

**BEFORE THE INDEPENDENT HEARINGS PANELS APPOINTED TO HEAR AND MAKE
RECOMMENDATIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON PROPOSED CHANGE 1
TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION**

UNDER the Resource Management Act 1991 (the
Act)

AND

IN THE MATTER of Hearing of Submissions and Further
Submissions on Proposed Change 1 to the
Regional Policy Statement for the
Wellington Region under Schedule 1 of the
Act

**STATEMENT OF EVIDENCE OF PHILIPPA NOEL CRISP
ON BEHALF OF GREATER WELLINGTON REGIONAL COUNCIL**

TECHNICAL EVIDENCE (LIMITS TO OFFSETTING)

HEARING STREAM 6 – INDIGENOUS ECOSYSTEMS

12 December 2023

TABLE OF CONTENTS

INTRODUCTION 3

QUALIFICATIONS AND EXPERIENCE 3

CODE OF CONDUCT..... 4

SCOPE OF EVIDENCE 4

BACKGROUND CONTEXT 4

TOPIC EVIDENCE..... 7

CONCLUSION..... 10

ATTACHMENT A: Recommended Updates to Change 1, Appendix 1A..... 12

INTRODUCTION

- 1 My full name is Philippa Noel Crisp. I am an Associate Ecologist.
- 2 I have prepared this statement of evidence on behalf of Greater Wellington Regional Council (**the Council**) in respect of technical related matters arising from the submissions and further submissions Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**Change 1**).
- 3 Specifically, this statement of evidence relates to the matters in the Section 42A Report – Indigenous Ecosystems.
- 4 I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

- 5 I hold a PhD in Agricultural Science (La Trobe University, in Melbourne), a Post-graduate Diploma in Environmental Studies (Victoria University) and a Bachelor's Degree in Agricultural Science (First Class Honours) from Canterbury University
- 6 I have 25 years of experience in ecological restoration and monitoring through roles I have held at Greater Wellington Regional Council (Greater Wellington) and the Department of Conservation. My expertise covers the conservation management of indigenous ecosystems (forests, wetlands and coastal dunes), as well as species, including birds, lizards and plants.
- 7 I have previously been a Team Leader in Greater Wellington's Environmental Science Department, overseeing scientific investigations, monitoring and research associated with terrestrial ecology in the Wellington region. In this role I have provided scientific advice for policy development and published multiple reports relating to the state of biodiversity in the region. In recent times, I have worked with the Department of Conservation and regional council scientists to develop a methodology for determining the regional conservation status of species.
- 8 I provided expert evidence to the Proposed Natural Resources Plan Hearings in relation to wetlands and have been involved in the implementation of the National Policy Statement for Freshwater Management 2020 for Greater Wellington, including preparing a list of nationally threatened freshwater species and collating information on their critical habitat needs.

CODE OF CONDUCT

9 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023 (Part 9). I have complied with the Code of Conduct in preparing this evidence. My experience and qualifications are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

10 My evidence addresses:

- (a) Whether the list of ecosystems and species in Table 17, Appendix 1A of Change 1 is consistent with Principle (2) in Appendices 3 and 4 of the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB): “when biodiversity offsetting is not appropriate” and “when biodiversity compensation is not appropriate”;
- (b) Whether Appendix 1A needs amendment to provide for the principles for biodiversity offsetting and compensation in the NPS-IB; and
- (c) Whether Appendix 1A needs amendment in response to any new technical information or a change in conservation status of species and ecosystems subsequent to Change 1 being notified.

BACKGROUND CONTEXT

11 Change 1 introduces a number of amendments to Chapter 3.6: Indigenous Ecosystems. Amongst these are changes to improve the application of the effects management hierarchy to manage the effects of development on indigenous biodiversity, responding to concerns that enabling the use of offsetting and compensation often results in poor outcomes for indigenous biodiversity.

12 These changes include extending Policy 24 to provide a regional interpretation of the “limits to the use of biodiversity offsetting and compensation”. Establishing limits to offsetting and compensation is an internationally-recognised principle required by effects management hierarchies in best practice guidance (e.g., Maseyk *et al.* 2018¹; New Zealand

¹ Maseyk F, Ussher G, Kessels G, Christensen M, Brown M 2018. Biodiversity offsetting under the Resource Management Act. A guidance document. September 2018. Prepared for the Biodiversity Working Group on behalf of the BioManagers Group

Government 2014²) and required by effects management hierarchy policies, including in the Natural Resources Plan for the Wellington Region (NRP) (appendices G2 and G3), the National Policy Statement for Freshwater Management 2020 (NPS-FM) (appendices 6 and 7) and most recently the NPS-IB (appendices 3 and 4).

13 Setting limits to the ability to use biodiversity offsets or compensation recognises that in certain situations, these tools may not be appropriate because the risk of net biodiversity loss is unacceptable. This includes if they will result in a significant or irreversible impact on irreplaceable and vulnerable biodiversity. Under the RMA, section 6(c) requires the recognition of and provision for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance. Limits can be set out in policy statements or plans, such as by requiring avoidance of adverse effects on such areas.

14 This concept is shown in Figure 1:

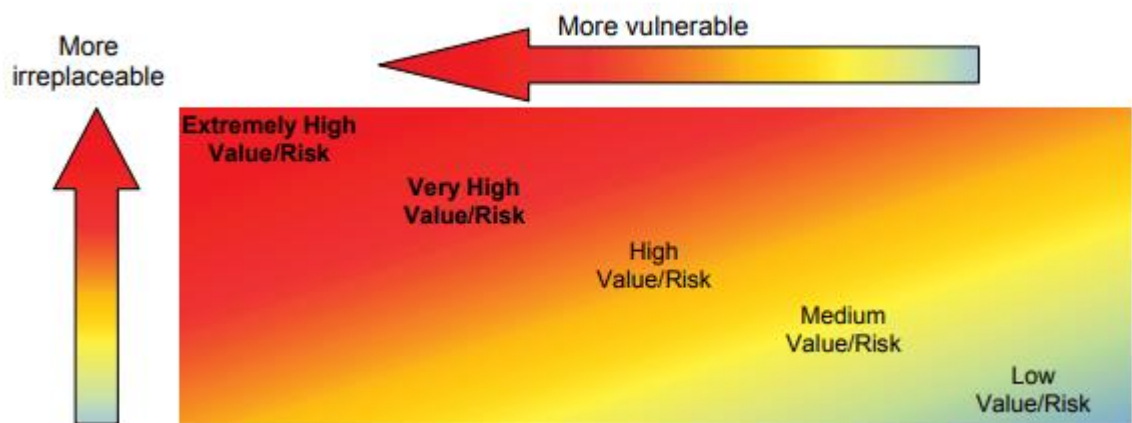


Figure 1: The value of biodiversity increases as vulnerability and irreplaceability increase; this also increases the risk that a biodiversity offset cannot be achieved.³

15 Other limits to offsetting are where, for some types of biodiversity, there may not be sufficient knowledge to assess whether the measurable biodiversity gains necessary to reasonably demonstrate no net loss can be achieved. This means that there are limits to

² New Zealand Government 2014. Guidance on good practice biodiversity offsetting in New Zealand. Wellington: New Zealand Government

³ <https://www.doc.govt.nz/documents/our-work/biodiversity-offsets/the-guidance.pdf>

offsetting caused by a lack of knowledge. It is also possible that limits to offsetting may exist if an appropriate offset site is not available.

16 Policy 24 includes the following limits:

(a) biodiversity offsetting should not be provided for:

- (i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or
- (ii) when an activity is anticipated to cause residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon; the indigenous biodiversity affected is irreplaceable or vulnerable; and

(b) biodiversity compensation should not be provided for where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon.

17 To support the preparation of Change 1, a technical assessment and background report were prepared to identify the ecosystems and species in the Wellington Region which meet these limits⁴. These ecosystems and species were then included in Change 1 as Appendix 1A.

18 Subsequent to Change 1 being notified, the NPS-IB was gazetted. The NPS-IB specifies the use of the effects management hierarchy to manage adverse effects of activities on indigenous biodiversity in the terrestrial environment, while the NPS-FM⁵ also specifies use of the effects management hierarchy to manage any loss of extent or values of natural inland wetlands or rivers. Both these national policy statements require resource consent applicants to comply with a set of principles for offsetting and compensation. These principles have the same intent as those set out in Policy 24 but use slightly different terminology. I have been asked to consider whether the terms used in Policy 24 and those used in the NPS-IB and NPS-FM have the same meaning and whether any amendments are required to Change 1 to give effect to the principles set out in the NPS-FM and/or NPS-IB.

⁴ [Crisp et al 2022 - Limits to Offsetting - Thresholds of concern for biodiversity \(gw.govt.nz\)](#)

⁵ These limits are referred to in both the NPS-IB and NPS-FM as the 'appropriateness of offsetting and compensation'.

TOPIC EVIDENCE

Comparison of “irreplaceable or vulnerable” (used in the NPS-IB) versus “threatened ecosystems or species or naturally uncommon ecosystems (used in Change 1 Policy 24)

- 19 The terms: “irreplaceability and vulnerability” are used in Appendices 3(a) and 4(a) of the NPS-IB, while the terminology used in Change 1, Policy 24 and Appendix 1A is that of “threatened ecosystems or species or *naturally uncommon* ecosystems.” I have been asked to comment on the consistency or equivalence of these different terms.
- 20 **Irreplaceability is defined in Appendix 6 of the NPS-IB as:** a measure of the uniqueness, replaceability and conservation value of biodiversity and the degree to which the biodiversity value of a given area adds to the value of an overall network of areas. It interacts with vulnerability, complexity and rarity to indicate the biodiversity value and level of risk for a given area.
- 21 **Vulnerability is defined in Appendix 6 of the NPS-IB as:** an estimate of the degree of threat of destruction or degradation that indigenous biodiversity faces from change, use or development. It is the degree to which an ecosystem, habitat or species is likely to be affected by, is susceptible to or able to adapt to harmful impacts or changes. It interacts with the irreplaceability, complexity and rarity to indicate the biodiversity value and level of risk for a given area.
- 22 In my opinion, the use of “threatened ecosystems or species or *naturally uncommon* ecosystems” is consistent in meaning and intent with the NPS-IB definitions for *irreplaceable* or *vulnerable* indigenous biodiversity. Threat listings for species are developed by assessing the vulnerability of the species to threats through assessments of the number of remaining individuals and the population trend for each species. Similarly, threats to ecosystems require an analysis of the area remaining and the ongoing pressures on that ecosystem type. *Naturally uncommon* ecosystems are rare and often support unique biodiversity. Their rarity and (usually) small size make them highly vulnerable to harmful impacts, i.e., the loss of area of one of these ecosystem types will disproportionately affect the extinction threat for that ecosystem.
- 23 When the conservation value of an area is assessed, the presence of threatened species or ecosystems is used to determine the irreplaceability of the area. Some of the ecosystems and habitats are considered irreplaceable because of their conservation value. In a regional conservation network, designed to protect or maintain regional biodiversity, the

full range of biodiversity variables is required to ensure the persistence of a representative range of biological diversity (Margules and Pressey 2000 ([\(PDF\) Systematic Conservation Planning \(researchgate.net\)](#)). Often there are only small remnants of an ecosystem type remaining to provide that representative ecosystem type, eg, old-growth kahikatea-pukatea forest of which only 1% can still be found in the region ([Greater Wellington — Forest ecosystems of the Wellington Region \(gw.govt.nz\)](#)) or shingle beaches that provide habitat for multiple threatened species ([Shingle beaches » Manaaki Whenua \(landcareresearch.co.nz\)](#)).

- 24 The list of ecosystems and species detailed in Appendix 1A of Change 1 was developed by collating information about naturally uncommon ecosystems and threatened species and ecosystems in the Wellington Region. Nationally Threatened species (Nationally Critical, Endangered, Vulnerable or Increasing) present in the region were identified by sourcing information from national threat lists published by the Department of Conservation ([New Zealand Threat Classification System Lists: Conservation publications \(doc.govt.nz\)](#)), which were developed using the national threat classification system detailed in Townsend et al. 2008 ([New Zealand Threat Classification System manual 2008 \(doc.govt.nz\)](#)). The degree of threat to naturally uncommon ecosystems (Critically Endangered, Endangered or Vulnerable) was assessed at a national scale by Holdaway et al. 2012 ([The Society for Conservation Biology \(wiley.com\)](#)) using the International Union for the Conservation of Nature (IUCN) Red List criteria for ecosystems (Rodriguez et al 2011, [The Society for Conservation Biology \(wiley.com\)](#)). The same criteria were also applied on a regional basis to indigenous forest ecosystem types in the Wellington Region as detailed in Singers et al. 2018, [Greater Wellington — Forest ecosystems of the Wellington Region \(gw.govt.nz\)](#). This information is detailed in Crisp and Oliver 2012, [Greater Wellington — Limits to offsetting – Thresholds of concern for biodiversity \(gw.govt.nz\)](#).

Comparison of “no technically feasible options by which to secure gains/net gain within an acceptable timeframe” (used in the NPS-IB) versus “no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement and adequate biodiversity offset” (used in Change 1, Policy 24)

- 25 While different terminology is used in the NPS-IB and Policy 24 of Change 1, in my opinion they essentially have the same meaning. The NPS-IB uses the words: “no technically feasible options by which to secure gains/net gain within an acceptable timeframe”, while “no appropriate site, knowledge, proven methods, expertise or mechanism available to

design and implement and adequate biodiversity offset” is used in Policy 24(a)(i) and Appendix 1A of the RPS Plan Change 1. The Change 1 terminology details the requirements to secure gains/net gains when it speaks about the need for appropriate sites, knowledge, proven methods, expertise or methods. The list in Appendix 1A was developed by listing those ecosystems and species’ populations that cannot be feasibly re-created and in my opinion is consistent with the principle in the NPS-IB. As detailed in Crisp and Oliver 2022, GWRC staff members (Drs Megan Oliver, Roger Uys and Philippa Crisp of the Environmental Science Department) evaluated whether each ecosystem type has developed through an irreplicable combination of factors, such as local geology, climate which cannot be re-created through human endeavour. Additionally, GWRC staff members used their knowledge of where previous efforts to recreate ecosystems have failed, (eg, for seagrass habitat re-creation), in order to identify whether technically feasible methods are available to re-establish the ecosystem type. It was also considered that adequate offsetting is not possible where the time needed to replace a vulnerable ecosystem takes more than a human generation. Old-growth forests, for example, have developmental lifespans of hundreds of years and it is not considered technically feasible to reestablish this ecosystem type through offsetting.

Are amendments to Appendix 1A required in response to NPS-IB principles?

26 As discussed above, I consider that the terminology used in the NPS-IB is equivalent to that used in the RPS Change 1, therefore no changes are required to Appendix 1A for this reason.

Are amendments required to the list of ecosystems and species in Table 17, Appendix 1A to ensure it is up-to-date?

27 As the national threat lists are updated on a regular basis, I consider that the list of threatened ecosystems and species in Table 17, Appendix 1A should also be updated when an opportunity arises and that a note should be added to Table 17 such that the most up-to-date threat rating for an ecosystem or species apply.

28 I recommend that amendments to Table 17 be made now, as more information has been collated since Change 1 was notified about other species groups and/or more knowledge gathered about whether a species is still present in the Wellington Region. Recent research for example, conducted to identify threatened freshwater-dependent species in the Wellington Region as part of implementing the NPS-FM, has raised that *Spiranthes*

novae-zelandiae and *Myosurus minimus* subsp. *novae-zelandiae* are now considered to be Extinct in the Wellington Region. Other species are proposed to be deleted from the table as they have moved in conservation status from being nationally Threatened to being nationally At Risk – Declining. This has been due to more individuals being located, but the populations are still under a declining trend. An example of this is the change in conservation status for *Larus bulleri* (black-billed gull) and *Charadrius bicinctus bicinctus* (banded dotterel) between national Threat lists for New Zealand birds in 2017 and 2021 (see [New Zealand Threat Classification System Lists: Conservation publications \(doc.govt.nz\)](https://www.doc.govt.nz)). Note that only nationally Threatened species are included in the Appendix 1A list. Recommended amendments are set out in Table 17 (included here as Attachment A, with new formatting applied as discussed in the Change 1 Section 42A report for Hearing Stream 6: Indigenous Ecosystems).

Should a limit/principle relating to technical feasibility of biodiversity compensation be added to Change 1?

- 29 Policy 24(b) as notified in Change 1 does not include any limit/principle relating to the technical feasibility of biodiversity compensation, which is inconsistent with Principle (2) in Appendix 4 of the NPS-IB.
- 30 In my opinion an amendment should be made to Policy 24(b) to include the limit relating to the technical feasibility of biodiversity compensation. This change would make Policy 24 consistent with the NPS-IB and with the intent of halting the loss of irreplaceable and vulnerable ecosystems. Appendix 1A details ecosystems where biodiversity offsetting is not feasible. In my opinion, biodiversity compensation is also not appropriate in those situations. The policy is relevant to ecosystems only - ecosystems that are both vulnerable and irreplaceable. The loss of these ecosystem types equates to a loss of the range of indigenous biodiversity in the region, so compensation does not solve the issue of indigenous biodiversity loss.

CONCLUSION

- 31 The list of ecosystems and species in Appendix 1A of Change 1 is consistent with Principle (2) in Appendices 3 and 4 of the NPS-IB with regard to “when biodiversity offsetting is not appropriate” and “when biodiversity compensation is not appropriate.”
- 32 The list of threatened ecosystems and species in Table 17, Appendix 1A should be updated over time, particularly for threatened species, as the national threat lists are updated on a

regular basis. Amendments should be made to Table 17 through the hearings process to reflect the latest knowledge.

- 33 A change to Policy 24 (b) in Change 1 to include the limit relating to the technical feasibility of biodiversity compensation should be made to ensure that it is consistent with the NPS-IB policy and with the intent of halting the loss of irreplaceable and vulnerable ecosystems.

DATE: 12 December 2023

PHILIPPA NOEL CRISP

ASSOCIATE ECOLOGIST, GREATER

WELLINGTON REGIONAL COUNCIL

ATTACHMENT A: RECOMMENDED UPDATES TO CHANGE 1, APPENDIX 1A

34 Note that the amendments shown to the introductory text for Appendix 1A and to the table headers are those as recommended by the section 42A reporting officer for Hearing Stream 6, Mr Wyeth, and shown in Appendix 1 of the Indigenous Ecosystems section 42A report. My recommended amendments are those to update the list of species and ecosystems and to show their threat status.

Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation

This appendix identifies the ecosystems and species that either meet or exceed the limits to the use of biodiversity offsetting and biodiversity compensation in the Wellington Region⁶. The setting of limits to the use of offsetting is one of the ten internationally accepted principles of biodiversity offsetting recognised by the Business and Biodiversity Offset Programme.⁷ Policy 24A gives effect to this direction in the Wellington Region.

Policy 24 ~~A (a)~~ directs that where policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation they shall not provide for biodiversity offsetting or biodiversity compensation: where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset (clause ~~(b)~~); or when an activity is anticipated to cause residual adverse effects on an area after an offset or compensate has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon (clause ~~(c)~~). This appendix identifies the species and ecosystems that meet these criteria in the Wellington Region.

~~Policy 24(b) directs that where policies and/or rules in district and regional plans enable the use of biodiversity compensation they shall not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon.~~

This appendix also identifies the ecosystems and species in the Wellington Region meeting the criteria for Policy 11(a) of the New Zealand Coastal Policy Statement ~~2010~~ (NZCPS) ~~2020~~, and for which adverse effects must be avoided. Consideration of biodiversity offsetting or biodiversity compensation for these ecosystems or species is therefore not provided for.

~~To avoid doubt, ecosystems and species that meet the criteria for:~~

~~• Policy 24(a)(i) exceed the limits of biodiversity offsetting meaning that applications for biodiversity offsetting cannot be considered.~~

⁶ As identified in Crisp P and Oliver M. 2022. Limits to offsetting – Thresholds of concern for biodiversity. Greater Wellington Regional Council, Publication No. GW/ESCI-G-22/11, Wellington.

⁷ Business and Biodiversity Offsets Programme (2018). The BBOP principles on biodiversity offsets, https://www.forest-trends.org/wpcontent/uploads/2018/10/The-BBOP-Principles_20181023.pdf

- ~~Policy 24(a)(ii) meet the limits of biodiversity offsetting. Applications for offsetting can be considered only if the anticipated offset plans to redress all residual adverse effects.~~
- ~~Policy 24A(c)(b) exceed the limits of biodiversity compensation meaning that applications for compensation cannot be considered.~~

To avoid doubt:

- Applications for offsetting adverse effects on ecosystems and species that meet the criteria in Policy 24A(b) can only be considered if at least a net gain, and preferably a 10% net gain or greater, in the indigenous biodiversity values affected can be reasonably demonstrated.
- Policy 24A(c) describes the situations when biodiversity compensation is not appropriate, meaning that where Policy 24A(c) applies applications for compensation cannot be considered.
- NZCPS Policy 11(a) exceed the limits of biodiversity offsetting and biodiversity compensation meaning that applications for offsetting or compensation cannot be considered.

The species listed in Table 17 are the nationally Threatened species and ecosystems and naturally uncommon ecosystems that are found within the Wellington Region, as detailed in the relevant publications listed on the Department of Conservation’s New Zealand Threat Classification web page. These ecosystems and species are assessed as being “vulnerable” or “irreplaceable” in accordance with the principles as to when biodiversity offsetting and biodiversity compensation is inappropriate. Note that the species list will change over time as national threat lists are updated or more knowledge is gained about the presence or absence of a species in the Wellington Region. The most up-to-date threat classification should be used at the time of making an assessment under Policy 24A or Policy 47 (h) and (i).

Table 17: Ecosystems and species that either meet or exceed the limits to the use of *biodiversity offsetting* and *biodiversity compensation* in the Wellington Region (there are some duplicates of ecosystems and species as some habitats relate to more than one ecosystem type).

Wetland ecosystems



<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u>	<u>NZCPS Policy 11(a)</u>
----------------------------------	------------------------------------------------------------------------------------------------------------------------------------	-----------------------------	---------------------------

		No appropriate site, knowledge, methods, expertise, mechanism⁸	
<u>Coastal turfs</u>	<u>Yes Critically Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Dune slacks</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Domed bogs</u>	<u>Yes Endangered</u>	<u>Yes</u>	
<u>Seepages and flushes</u>	<u>Yes Endangered</u>	<u>Yes</u>	
<u>Sinkholes</u>	<u>Yes Endangered</u>	<u>Yes</u>	
<u>Ephemeral wetlands</u>	<u>Yes Critically Endangered</u>		<u>Yes</u>
<u>Lagoons</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Lake margins</u>	<u>Yes Vulnerable</u>		
<u>Tarns</u>	<u>Yes Naturally Uncommon</u>		

Wetland plant species

Ecosystem or species name	Policy 24A(b)&(c) (a)(ii) Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)	Policy 24A(b) (a)(ii) No appropriate site, knowledge, methods, expertise, mechanism	NZCPS Policy 11(a)
<u>Crassula peduncularis</u>	<u>Yes Critical</u>		
<u>Epilobium hirtigerum</u>	<u>Yes Critical</u>		
<u>Juncus holoschoenus var holoschoenus</u>	<u>Yes Critical</u>		
<u>Sebaea ovatus</u>	<u>Yes Critical</u>		
<u>Simplicia felix</u>	<u>Yes Critical</u>		
<u>Urticularia australis</u>	<u>Yes Critical</u>		
<u>Centipeda minima subsp minima</u>	<u>Yes Endangered</u>		
<u>Isolepis basilaris</u>	<u>Yes Endangered</u>		

⁸ This column shows situations where it is not feasible to offset for residual adverse effects because there is no appropriate site, knowledge, proven methods, expertise, or mechanism available to design and implement an adequate biodiversity offset.

<u>Mazus novaezeelandiae</u> subsp. <u>impolitus</u>	<u>Yes Endangered</u>		
<u>Myosurus minimus</u> subsp. <u>Novae zelandiae</u>	<u>Yes</u>		
<u>Pterostylis irwinni</u>	<u>Yes Endangered</u>		
<u>Pterostylis micromega</u>	<u>Yes Endangered</u>		
<u>Amphibromus fluitans</u>	<u>Yes Vulnerable</u>		
<u>Carex cirrhosa</u>	<u>Yes Vulnerable</u>		
<u>Gratiola concinna</u>	<u>Yes Vulnerable</u>		
<u>Libertia peregrinans</u>	<u>Yes Vulnerable</u>		
<u>Spiranthes novae zelandiae</u>	<u>Yes</u>		
<u>Juncus pauciflorus</u>	<u>Yes Vulnerable</u>		

Wetland bird species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)-</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Anas superciliosa</u> <u>superciliosa (grey duck)</u>	<u>Yes Critical</u>		
<u>Botaurus poiciloptilus</u> <u>(matuku, bittern)</u>	<u>Yes Critical</u>		
<u>Calidris canutus rogersi</u> <u>(lesser knot)</u>	<u>Yes</u>		

Wetland invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)-</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NCPS Policy 11(a)</u>
----------------------------------	--------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------	--------------------------

<u>Lepidurus apus viridis</u> (tadpole shrimp)	<u>Yes Endangered</u>		
<u>Echyridella aucklandica</u> (kākahi)	<u>Yes Vulnerable</u>		<u>Yes</u>

Riverine ecosystems

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)-</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Braided riverbeds</u>	<u>Yes Endangered</u>		

Riverine plant species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)-</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Myosotis pottsiana</u>	<u>Yes</u>	-	
<u>Rorippa divaricata</u>	<u>Yes Vulnerable</u>		
<u>Fissidens berteroi</u>	<u>Yes Vulnerable</u>		

Riverine bird species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)-</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Larus bulleri (black-billed gull)</u>	<u>Yes</u>		<u>Yes</u>
<u>Charadrius bicinctus bicinctus (banded dotterel)</u>	<u>Yes</u>		<u>Yes</u>
<u>Chidonias albobriatus</u>	<u>Endangered</u>		

Riverine invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Omanperla hollowayae</i></u>	<u>Yes Critical</u>		
<u><i>Potamopyrgus oppidanus</i></u>	<u>Yes Critical</u>		
<u><i>Hydrochorema</i> n. sp.</u>	<u>Yes Endangered</u>		
<u><i>Cryptobiosella furcata</i></u>	<u>Yes Endangered</u>		
<u><i>Cryptobiosella spinosa</i></u>	<u>Yes Endangered</u>		
<u><i>Echydrella aucklandica</i> (kākahi)</u>	<u>Yes Vulnerable</u>		<u>Yes</u>
<u><i>Xenobiosella motueka</i></u>	<u>Yes Vulnerable</u>		

Riverine fish species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Galaxias postvectis</i> (shortjaw kōkopu)</u>	<u>Yes Vulnerable</u>		
<u><i>Geotria australis</i> (lamprey)</u>	<u>Yes Vulnerable</u>		

Lacustrine ecosystem

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Inland sand dunes</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	

<u>Shingle beaches</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Stony beach ridges</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Ephemeral wetlands</u>	<u>Yes Critically endangered</u>		<u>Yes</u>
<u>Lagoons</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Lake margins</u>	<u>Yes Vulnerable</u>		
<u>Estuaries</u>	<u>Yes Vulnerable</u>		<u>Yes</u>

Lacustrine plant species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Althenia bilocularis</i></u> ⁹	<u>Yes Vulnerable</u>	=	
<u><i>Pterostylis micromega</i></u>	<u>Yes Critical</u>		
<u><i>Amphibromus fluitans</i></u>	<u>Yes Endangered</u>		
<u><i>Ricciocarpos natans</i></u>	<u>Yes</u>		
<u><i>Isolepis basilaris</i></u>	<u>Yes Endangered</u>		
<u><i>Carex cirrhosa</i></u>	<u>Yes Vulnerable</u>		
<u><i>Fissidens berteroi</i></u>	<u>Yes Vulnerable</u>		

Lacustrine bird species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Anas chlorotis</i></u>	<u>Increasing</u>		
<u><i>Anas superciliosa superciliosa</i></u> (grey duck)	<u>Yes Critical</u>		

⁹ previously listed as a riverine plant specie

<u><i>Egretta alba modesta</i></u> <u><i>Ardea alba</i></u> (white heron)	<u>Yes Critical</u>		
<u><i>Botaurus poiciloptilus</i></u> (matuku, bittern)	<u>Yes Critical</u>		
<u><i>Larus bulleri</i></u> (black billed gull)	<u>Yes</u>		<u>Yes</u>
<u><i>Charadrius bicinctus bicinctus</i></u> (banded dotterel)	<u>Yes</u>		<u>Yes</u>
<u><i>Anarhynchus frontalis</i></u> (wrybill)	<u>Yes Vulnerable</u>		
<u><i>Calidris canutus rogersi</i></u> (lesser knot)	<u>Yes</u>		
<u><i>Hydroprogne caspia</i></u> (Caspian tern)	<u>Yes Vulnerable</u>		<u>Yes</u>
<u><i>Poliiocephalus rufopectus</i></u> (New Zealand dabchick)	<u>Yes Vulnerable</u>		

Lacustrine fish species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Geodria australis</i></u> (lamprey)	<u>Yes Vulnerable</u>		

Lacustrine invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Orthoclydon pseudostinaria</i></u>	<u>Yes</u>		

<u>Lepidurus apus viridis</u> (tadpole shrimp)	<u>Yes Endangered</u>		
<u>Echyridella aucklandica</u> (kākahi)	<u>Yes Vulnerable</u>		<u>Yes</u>

Marine habitat or ecosystem

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Bull kelp forests (Durviallea spp.)</u>		<u>Yes</u>	<u>Yes</u>
<u>Cook Strait shelf-edge canyon habitats</u>		<u>Yes</u>	<u>Yes</u>
<u>Matikona reef habitats</u>		<u>Yes</u>	<u>Yes</u>
<u>Opouawe Bank methane seeps</u>		<u>Yes</u>	<u>Yes</u>
<u>Adamsiella algal beds</u>		<u>Yes</u>	<u>Yes</u>
<u>Deepsea woodfall habitat</u>		<u>Yes</u>	<u>Yes</u>
<u>Rhodolith beds</u>		<u>Yes</u>	<u>Yes</u>
<u>Hydroid tree communities</u>		<u>Yes</u>	
<u>Beds of large bivalve molluscs (horse mussels, scallops, oysters, <i>Dosinia</i> spp.)</u>		<u>Yes</u>	<u>Yes</u>
<u>Mixed high current assemblages (e.g., sponge gardens)</u>		<u>Yes</u>	<u>Yes</u>
<u>Tubeworm (polychaete) fields and mounds</u>		<u>Yes</u>	
<u>Sea anemone meadows</u>		<u>Yes</u>	<u>Yes</u>
<u>Seagrass meadows</u>		<u>Yes</u>	<u>Yes</u>
<u>Brachiopod beds</u>		<u>Yes</u>	

<u>Bryozoan thickets</u>		<u>Yes</u>	
<u>Black coral colonies</u>		<u>Yes</u>	<u>Yes</u>
<u>Giant kelp (<i>Macrocystis</i> spp.) forests</u>		<u>Yes</u>	<u>Yes</u>
<u>Mixed kelp assemblages</u>		<u>Yes</u>	<u>Yes</u>
<u>Seamounts</u>		<u>Yes</u>	<u>Yes</u>
<u>Estuaries</u>		<u>Yes</u>	<u>Yes</u>

Marine algae species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Dione arcuate</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Gelidium johnstonii</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Gigartina dilatata</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Prasionema heeschiaie</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Gigartina</i> sp. <u>C</u></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Prasiola</i> sp. <u>A</u></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Prasiola novaezelandiae</i></u>	<u>Yes Endangered</u>		<u>Yes</u>

Marine invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Smeaqol climoi</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Boccardiella magniovata</i></u>	<u>Yes Critical</u>		<u>Yes</u>
<u><i>Spio aequalis</i></u>	<u>Yes Endangered</u>		<u>Yes</u>
<u><i>Paragorgia alisonae</i></u>	<u>Vulnerable</u>		<u>Yes</u>

Marine mammal species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Orcinus orca</i></u>	<u>Critical</u>		<u>Yes</u>

Marine shark species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Carcharodon carcharias</i></u>	<u>Endangered</u>		<u>Yes</u>
<u><i>Cetorhinus maximus</i></u>	<u>Vulnerable</u>		<u>Yes</u>

Coastal margin habitat or ecosystem

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Coastal turfs</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Marine mammal haul-outs</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Seabird burrowed soils</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Shingle beaches</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Stony beach ridges</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Calcareous coastal cliffs</u>	<u>Yes Endangered</u>	<u>Yes</u>	<u>Yes</u>
<u>Coastal cliffs on acidic rock stacks</u>	<u>Yes Least concern</u>	<u>Yes</u>	<u>Yes</u>
<u>Coastal rock stacks</u>	<u>Yes Least concern</u>	<u>Yes</u>	<u>Yes</u>

<u>Active sand dunes</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Stable sand dunes</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Estuaries</u>	<u>Yes Vulnerable</u>		<u>Yes</u>

Coastal plant species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Leptinella nana</u>	<u>Yes Critical</u>		<u>Yes</u>
<u>Muehlenbeckia astonii</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Pimelea aff villosa</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Atriplex buchananii</u>	<u>Yes Vulnerable</u>		<u>Yes</u>
<u>Myosotis brevis</u>	<u>Yes Vulnerable</u>		<u>Yes</u>
<u>Lepidium oleraceum</u>	<u>Endangered</u>		<u>Yes</u>
<u>Pimelea aff. aridula</u>	<u>Endangered</u>		<u>Yes</u>

Coastal bird species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Eqretta sacra sacra (reef heron)</u>	<u>Yes Endangered</u>		<u>Yes</u>
<u>Charadrius bicinctus bicinctus (banded dotterel)</u>	<u>Yes</u>		<u>Yes</u>
<u>Hydroprogne caspia (Caspian tern)</u>	<u>Yes Vulnerable</u>		<u>Yes</u>
<u>Charadrius obscurus aquilonius</u>	<u>Increasing</u>		<u>Yes</u>
<u>Chidonias albostratus</u>	<u>Endangered</u>		<u>Yes</u>

<u><i>Stictocarbo punctatus</i></u>	<u>Vulnerable</u>		<u>Yes</u>
-------------------------------------	-------------------	--	------------

Coastal lizard species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Oligosma whitakeri</i></u> <u>(Whitaker's skink)</u>	<u>Yes Vulnerable</u>		<u>Yes</u>

Coastal lichen species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Ramalina pacifa</i></u>	<u>Vulnerable</u>		<u>Yes</u>

Coastal moth species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Notoreas peronata</i> subsp.</u> <u>"Castlepoint"</u>	<u>Critical</u>		<u>Yes</u>

Forest ecosystem

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(iii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Titoki, ngaio</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	

<u>Totara, matai, ribbonwood</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Tawa, titoki, podocarp</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Totara, matai, broadleaf</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Kahikatea, pukatea</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Totara, titoki</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Kahikatea, totara, matai</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Black beech</u>	<u>Yes Vulnerable</u>	<u>Yes</u>	
<u>Cloud forests</u>	<u>Yes Least concern</u>	<u>Yes</u>	

Forest plant species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Brachyglottis pentacope</u>	<u>Yes Critical</u>		
<u>Didymodon calycinus</u>	<u>Yes Critical</u>		
<u>Gastrodia coperae</u>	<u>Yes Critical</u>		
<u>Korthasella salicorniodies</u>	<u>Yes Critical</u>		
<u>Oleria gardneri</u>	<u>Yes Endangered</u>		
<u>Brachyglottis kirkii var kirkii</u>	<u>Yes Vulnerable</u>		
<u>Dactylanthus taylorii</u>	<u>Yes Vulnerable</u>		
<u>Kunzea serotina</u>	<u>Yes Vulnerable</u>		
<u>Pittosporum obcordatum</u>	<u>Yes Vulnerable</u>		
<u>Solanum aviculare var aviculare</u>	<u>Yes Vulnerable</u>		

Forest bird species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally</u>	<u>Policy 24A(b) (a)(i)</u>	<u>NZCPS Policy 11(a)</u>
----------------------------------	---------------------------------------------------------------------------------------------	-----------------------------	---------------------------

	<u>uncommon ecosystem (Threat Status)</u>	<u>No appropriate site, knowledge, methods, expertise, mechanism</u>	
<u>Notiomystis cincta</u> (Stitchbird)	<u>Yes Vulnerable</u>		
<u>Eudymys taitensis</u>	<u>Vulnerable</u>		
<u>Nestor meridionalis meridionalis</u>	<u>Vulnerable</u>		
<u>Falco novaeseelandiae ferox</u>	<u>Increasing</u>		

Forest lizard species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Oligosoma aff. infrapunctatum</u> <u>'southern North Island'</u>	<u>Yes Vulnerable</u>		

Forest invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Orthoclydon pseudostinaria</u>	<u>Yes Critical</u>		

Forest bat species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>

<u><i>Chalinolobus tuberculatus</i></u> (long-tailed bat)	<u>Yes Critical</u>		
<u><i>Mystacina tuberculata rhyacobi</i></u> (central lesser short tailed bat)	<u>Yes</u>		

Forest mushroom species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Cortinarius gemmeus</i></u>	<u>Vulnerable</u>		
<u><i>Inocybe amygdalina</i></u>	<u>Vulnerable</u>		
<u><i>Laccaria oaraphysata</i></u>	<u>Vulnerable</u>		
<u><i>Russula albolutescens</i></u>	<u>Vulnerable</u>		
<u><i>Russula allochroa</i></u>	<u>Vulnerable</u>		
<u><i>Russula aucklandica</i></u>	<u>Vulnerable</u>		
<u><i>Russula multicystidata</i></u>	<u>Vulnerable</u>		
<u><i>Russula vinaceocuticulata</i></u>	<u>Vulnerable</u>		

Forest moth species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Orthoclydon pseudostinaria</i></u>	<u>Critical</u>		
<u>"<i>Schiffermuelleria</i>" orthophanes</u>	<u>Critical</u>		

Other ecosystem

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Cave entrances</u>	<u>Yes Critically endangered</u>	<u>Yes</u>	
<u>Calcareous cliffs, scarps and tors</u>	<u>Yes Vulnerable</u>	<u>Yes</u>	
<u>Boulderfields of calcareous rocks</u>	<u>Yes Vulnerable</u>	<u>Yes</u>	

Other plant species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Simplicia felix</u>	<u>Yes Critical</u> <u>Mudstone</u>	<u>Yes</u>	
<u>Anogramma leptophylla</u>	<u>Yes Vulnerable</u> <u>Rock faces</u>	<u>Yes</u>	
<u>Cladia blanchonii</u>	<u>Yes Vulnerable</u> <u>Basalt outcrops</u>	<u>Yes</u>	
<u>Geranium retrorsum</u>	<u>Yes Vulnerable</u> <u>Cliffs</u>	<u>Yes</u>	
<u>Pimelea tomentosa</u>	<u>Yes Vulnerable</u> <u>Cliffs</u>	<u>Yes</u>	

Land snail species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u>Poweliphanta traversi otakii</u>	<u>Critical</u>		

Land orthoptera species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Deinacrida rugosa</i> (Cook Strait weta)</u>	<u>Vulnerable</u>		

Land invertebrate species

<u>Ecosystem or species name</u>	<u>Policy 24A(b)&(c) (a)(ii)</u> <u>Threatened species or ecosystem or naturally uncommon ecosystem (Threat Status)</u>	<u>Policy 24A(b) (a)(i)</u> <u>No appropriate site, knowledge, methods, expertise, mechanism</u>	<u>NZCPS Policy 11(a)</u>
<u><i>Prasmiola unica</i></u>	<u>Critical</u>		