



28 February 2023

**Hon Damien O'Connor**  
Minister for Biosecurity  
Parliament Buildings, Wellington

**Hon Willow-Jean Prime**  
Minister of Conservation  
Parliament Buildings, Wellington

Dear Ministers

Over a year has passed since I released my report [\*Space Invaders: A review of how New Zealand manages weeds that threaten native ecosystems\*](#). The review outlined the steps that need to be taken to improve the weed management system in Aotearoa, which is currently hampered by inadequate leadership, limited information and haphazard and uncoordinated actions.

I am concerned that there has been little progress in the interim. In my view, you cannot be confident that the programmes your agencies are running are making a difference and will be sufficient in the face of an ever-growing pool of emerging weeds that are establishing themselves in the wild. The origins of the problem are not recent, but my report provides you with a diagnosis that should enable you to perform your statutory responsibilities more effectively.

I acknowledged in my *Space Invaders* report that it would be easier to provide better leadership and national direction if there were legislative changes. The Biosecurity Act has been under review for three and a half years but there appears to be no indication that that review will be concluded any time soon. For that reason, this letter urges you to take the immediate actions suggested in the report, all of which can proceed without prejudice to anything you might decide to legislate for.

To help energise some action, in November 2022 I hosted a one-day *Space Invaders workshop*, which marked the first anniversary of the release of my report. The workshop sought to draw on the collective knowledge of the attendees – which included your officials – to identify practical initiatives that can be implemented in the short- to medium-term. It also attempted to identify individuals or organisations who could take the lead.

The two topics for discussions were improvements to information management and action on emerging weeds. Many useful suggestions were put forward by the attendees. The workshop report, with a long list of suggested improvements, has been shared with the workshop attendees, including your officials. The following is a short list of the improvements that were ranked as priorities by the attendees in the room:

- Improved information-sharing between organisations, including the development of a portal for exotic plants to display spatial and temporal distributions, spread potential and likely pathways.
- The development of agreed data standards to improve consistency of information that is gathered.
- The establishment of an expert group (an emerging risks team) to regularly undertake

national scans of emerging weeds to inform management. This team would help triage information and provide advice to quickly respond to emerging weeds on-the-ground.

- Genuinely *national level* leadership to drive improvements.

The first two suggestions are practical improvements to the way weeds (and plants-) relevant information is currently managed and will go some way towards addressing the issues identified in my *Space Invaders* report. Information system shortcomings mean lost management opportunities. It is hard to know if certain weeds occur in any location of interest, what their impacts are and whether they are currently managed or have been managed in the past. There is a real need for better tools, information and coordination.

The third suggestion – establishment of an emerging risks team – is not new and has been promoted in the past. The creation of such a team is well overdue.

What became clear at the workshop, was the need for the *national level* leadership to drive improvements. Currently, leadership for managing weeds harming native ecosystems is fragmented. The Department of Conservation has a leadership role in protecting biodiversity but does not have a leadership role in biosecurity. Sixteen regional councils and unitary authorities provide regional leadership in their regions. And while the Biosecurity Act states that the Director-General of the Ministry for Primary Industries provides “overall leadership in activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in New Zealand”, there is little visibility of this leadership being exercised in respect of weeds that are threatening native ecosystems.

At their core, my recommendations in the *Space Invaders report* are a call for greater leadership. This includes a call for better leadership and clearer national direction that can be specifically targeted to managing weeds that are currently harming, or could harm, native ecosystems.

Only you, as Ministers, can insist that your officials provide the sustained attention to this issue that it requires. Please resist the assurance that the matter is in hand or that completion of the Biosecurity Act review is necessary before any improvements to information management or action on emerging weeds can be progressed. The issue is not in hand and making some tangible progress does not require legislation (although in due course that would help).

In the face of an ever-growing pool of emerging weeds threatening unique native ecosystems, we cannot afford further delay in improving New Zealand’s weed management system. Failure to take practical steps will simply mean that you are passing an ever-larger bill to future generations. We have seen how wilding conifers were able to take off and how expensive trying to keep them in check will be. I take no comfort from warning that weeds with the potential to cost just as much are right now taking the first steps towards widespread invasion.

I hope I can look forward to some forward momentum and practical progress during the current Parliamentary term.

Yours sincerely



**Rt Hon Simon Upton**

Parliamentary Commissioner for the Environment  
Te Kaitiaki Taiao a Te Whare Pāremata