Farmer Submission Template: Draft National Policy Statement for Indigenous Biodiversity

Beef + Lamb New Zealand will be making a submission on behalf of the sheep and beef sector on the Government’s Draft National Policy Statement for Indigenous Biodiversity.

Many farmers want to also make their own submission to the Government. This template is designed to help those sheep and beef farmers wishing to make their own submission.

Steps for writing your own submission:

2. Populate this submission template.
   a. Review the suggested feedback. Delete any comments that you disagree with.
   b. Remember to personalise your submission by using the prompts in the text box below to help you.
3. Email your completed submission to indigenousbiodiversity@mfe.govt.nz.

Why personalise your submission?

Including your personal story and talking about how the proposal could impact you is really important. It leaves a lasting impression with policy makers, and helps the Government to understand how its proposal will affect people..

How did B+LNZ develop the suggested comments for farmers to use?

The comments for you to cut and paste were developed by B+LNZ using:

- Farmer feedback, collected from 12 nationwide workshops run by B+LNZ over the past month;
- Advice collected from consultation with biodiversity experts; and
- Advice collected from consultation with policy and planning experts.
DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Submission on the publicly notified draft National Policy Statement for Indigenous Biodiversity.


To: Ministry for the Environment

Personal Information
* indicates required fields
Company name:
Given names*:
Surname:
Contact person:
Address:
Region*:
Country:
Phone:
Email*:
Submission

- Thank you for the opportunity to provide feedback on the proposed National Policy Statement for Indigenous Biodiversity.

Background about my farm

- Nelson Province. Almost all hill-country
- Parents bought it and I took it over after getting married. Sold recently to retire to Motueka
- Steep hill-country
- Sheep, Beef, goats and farm forestry
- Parents bought the farm 1957. I was 60 years on the farm and actively farming since 1960 when I left High School to work on farm
- Most of the farm was covered in bracken fern. Developed by burning, working clearer slopes and oversowing steeper ground. Potential to extend forestry. Struggle with not enough flat land to finish stock and drought prone
- With neighbours and through QE11 we fenced off 11 of native bush for QE11 Covenant. Rared a of farm forestry. It would be impractical and prohibitively costly to fence off water ways. They were only creeks of less than a metre. Fenced off areas become choked with all weeds which block waterway causing flooding.

(Keep this section brief. It is not required for your submission, but does help set the scene)

- Most family farmers want to pass land on in better condition than when they took it over. The "Money System" with its compounding Debt is forcing the family farm off the land only to be taken over by corporate farming (very often overseas owned) that are there for the profit.
- Unfortunately in Nelson Province as in many other areas it is more profitable selling land than farming it as lifestyle blocks. The best food producing land is being swallowed up in housing and lifestyle blocks. Our Rating system needs to change to reflect the value of production from the land not the land speculation price. Farmers need to be recompensed for any land taken for biodiversity otherwise the farmer is penalized and has to wear the cost while the rest of NZ

Why am I making this submission?

While I agree with the need to protect NZ biodiversity, I do not agree that Councils or Government are the people to decide what is iconic or boundaries of highly valued indigenous biodiversity. Farmer groups need to be in charge as happened in Takaka and Councils can help administer.

Section A: General responses to the proposals:
Review the following comments. Delete any comments that you disagree with. Remember to personalise your submission by using the prompts in the text box below to help you.

- I support the overall goal of the proposals that recognise the value of indigenous biodiversity to New Zealand, its people, and communities, and to ensure that Indigenous Biodiversity is protected, and where it has been significantly lost is restored.

- New Zealand farmers have retained 2.7 million hectares of indigenous habitat within their farms which is testament to the value farmers place on indigenous biodiversity. A total of 24% of New Zealand’s total indigenous habitats occurs on the 8.8 million hectares covered by sheep and beef farms, with over 47% of QEII covenants being on sheep and beef farms. The area of indigenous habitats formally protected by QEII, Ngā Whenua Rāhui, and other covenants is growing.

- I support provisions which recognise that for conservation actions to be enduring, they require landowner and community support and leadership. Policies need to recognise that people are critical to maintaining and enhancing biodiversity, and acknowledge the importance of respecting and fostering the contribution of landowners as custodians and Kaitiaki to these habitats and species.

- I believe that you should contact the Upper Takaka farmers that went through an extensive exercise to protect iconic indigenous biodiversity and use their experience as a blue-print. (Contact Harward’s they were heavily involved.)

- However, I oppose provisions which seek to ‘lock up indigenous biodiversity’ and in so doing penalise those landowners who have done the most to protect indigenous biodiversity. I seek changes to the policy to ensure that indigenous biodiversity can be integrated within pastoral based land uses and activities, and which recognise these can co-exist for mutual benefit.

- If farm land is to be locked up then farmers need to be re-compensed

- Indigenous biodiversity should be considered as an asset to the farming business, and communities, and not as a liability. Subtle but significant changes to the NPSIB are required to ensure that existing conservation efforts are rewarded, and ongoing conservation is supported and incentivised. The recognition of the values of indigenous biodiversity as part of pastoral based landscapes and farming businesses is required to ensure that these values, habitats, and species, are sustainably managed. A strong regulatory or stick approach to the recognition and ongoing management of indigenous biodiversity could, if not carefully constructed, undermine existing and future conservation efforts.

- In our area, any area fenced off from all stock ends up choked in weeds and scrub (old mans beard, gorse, broom, manuka and convolvulus.)
Sheep avoid walking in water so fences should be single electric wire to keep cattle out but allow sheep to graze to keep weeds under control. There are plants like flax and eucalyptus Nitens that are not favored by sheep if planting is required.

- I cleared a long length of the river bank which ran between the road and the Motueka River with our bulldozer initially, as it was an impenetrable mass of old mans beard creeper, blackberry, logs, and scrub. I then fed cattle with hay to control regrowth and the seed from the hay regrassed the area. I was careful when I grazed, the duration and how many cattle were in the mob. Fishermen and others benefitted by easy access. In the few short years I have not grazed that part of the river bank, it has reverted back to as it was, which proves my point that with careful management even cattle can be used safely near waterways. The age of cattle and time of year can make a difference.

- Old mans beard is a real problem in the Motueka area and it takes over any area fenced off from stock. It smothers willow trees and any other trees or scrub and becomes a seed source for it to be spread on the wind. It cannot survive under a full canopy of trees or in native bush but will come up where-ever a tree in the native bush has fallen over creating a light well or around the perimeter.

- In frost prone areas where creeks have been fenced off, the water cress grows rampant, then gets frosted off in winter, dies and gets swept down stream where it blocks culverts, collects silt, dams up creek and floods surrounding land or cuts a new channel during next flood. Most of this could be avoided if sheep were not fenced out but able to keep all in check.

- Fencing to keep cattle out of waterways on flat or easy contour is OK, but it can be completely impracticable on hill-country. It also depends on the intensity of stocking and on many hill-country farms you have wild pigs, roaming goats and deer (we had falow deer & pigs) which a standard fence is no barrier.

- Again every area is different – one size fits all approach it not practicable and emphasis should be on encouraging land holders to manage waterways with care. Break feeding stock or intensive dairying next to waterways is completely different to farming sheep on hill-country.

- Fencing off waterways is not the whole answer. You will never stop wild pigs and deer wallowing in creeks, you will only create a reservoir for weed seeds to spread. Also does not address polution from Urban centres.

- Phosphate Leaching and overuse of Urea not addressed

- Authorities, scientists, farm advisors and farmers need to understand that by using Rock Phosphate rather than Superphosphate, leaching could be cut to near zero. Superphosphate can leach up to 30%.

- The stupidity of using huge amounts of Urea when legumes like clover produce it at little cost beggars belief. A little artificial fertilizer is OK but
we only need to look at the impact and damage over use of artificial fertilizers have caused in Europe. The huge increase in Urea (a waste product of the petro-chemical industry) was pushed by them, fertilizer companies, banks and farm advisors!

• If there was far less use of Urea and we used rock phosphate instead of superphosphate, there would not be the same damage or problems with water quality!!

•  

- Talk about the indigenous biodiversity you have on your farm. What you do to look after it and why you think it’s important?
- What is the history behind caring for biodiversity on your farm? Did your father or grandfather look after an area of your farm, such as set aside a bush block that you continue to care for.
- Are there any areas of native biodiversity on your farm that you like to visit? Why? For example, a quiet spot to think.
- What sort of management actions do you undertake on your farm to care for native biodiversity? Think about pest control, fencing/retiring areas, plantings, 

Personalise your submission by using the prompts in the text box below to help you.
Section B: Impacts and implementation:

Review the following comments. Delete any comments that you disagree with. Remember to personalise your submission by using the prompts in the text box below to help you.

- I am deeply concerned about the potential impacts of these proposals on my farm in relation to areas being identified as Significant Natural Areas (SNA’s), areas identified as being important for the protection of SNA’s which may include land adjacent to SNA’s, and the identification of highly mobile species, in relation to the impacts this may have on my farming business and its resilience and viability. The provisions could be interpreted as precluding the ongoing grazing of animals adjacent to and within these areas, which means that those that have done the most to protect indigenous habitats and species within their farming businesses could shoulder the greatest costs including restrictions to their farming businesses.

- The compliance costs of the various proposals are likely to be significant and include the identification of these habitats and species, fencing of these habitats (could require deer fencing to manage wild populations), and ongoing pest management. As currently proposed, it is unclear where these costs fall. Financial, technical, and human resourcing support should be provided to assist landowners to continue to protect and restore indigenous habitats and populations within their farming businesses and communities. Support should be provided to not only areas where indigenous biodiversity is being restored, but also to where it currently exists.

- I am concerned that New Zealand does not currently have the extent of technical expertise available to assist regional and district councils to identify SNA’s and mobile species across their territorial areas within the next five years, to ground truth this work, and to work with farmers. The requirements on regional and district councils including timeframes should ensure that the identification of these habitats and species is robust, and is undertaken in a way which engages landowners and communities, builds understanding and knowledge, and which empowers local conservation efforts.
Personalise your submission by using the prompts in the text box below to help you.

- The specific provisions of the proposal that this submission relates to and the decisions it seeks are as detailed in the table in Section C below.

Section C: Specific responses to the proposals:

<table>
<thead>
<tr>
<th>Specific Provision in the Proposed Plan</th>
<th>Submission</th>
<th>Decision sought</th>
</tr>
</thead>
<tbody>
<tr>
<td>The specific provisions my submission relates to are:</td>
<td>My submission is that:</td>
<td>The decision I would like MfE and DoC to make is:</td>
</tr>
</tbody>
</table>

Review the following comments. Delete any comments that you disagree with. Remember to personalise your submission by using the prompts in the grey box below to help you.

Hutia Te Rito
(Discussion document on a proposed National Policy Statement for Indigenous Biodiversity, page 23)

- I support provisions which recognise and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks.

I seek that the term “stewardship” is replaced with “custodianship” which more correctly reflects the values I place on indigenous biodiversity within my farm and as part of my family’s history and our future, and our relationship and ties to our land.

- Are there any specific impacts that the Draft National Policy Statement for Indigenous Biodiversity could have on your farm?
  - Yes  
  - Do you have areas of indigenous vegetation on your property?
  - Native bush, Manuka and totara seedlings that are growing like weeds taking over pasture. Stock, not even goats eat them so are becoming a problem.  
    - What type? Native bush, wetlands etc?
  - [number] ha native bush [number] ha of manuka and totara regrowth. Approx [number] of farm  
    - yes, how big an area/what proportion of your farm?
  - Although we had about [number] ha it paid its way only because we sold land and paid off our mortgage many years ago.  
    - How do you think the proposals could affect future on-farm management decisions?
  - Any restrictions and added costs would be disastrous on most hillycountry farms which have to contend with variable weather patterns and fluctuating prices for stock.  
    - How do you think the proposals could affect you financially?
  - Can you think of any barriers that will limit your ability to implement the proposals on your farm?
3.7 Social, economic and cultural wellbeing:
(Discussion Document Page 45)

- I support provisions which empower and support landowner and community conservation activities and local approaches.
- I support the recognition that the maintenance of indigenous biodiversity can occur while still providing for use and development.
- I seek that the NPSIB be amended so that policies and rules reflect Objective 3.7 including prioritising non-regulatory approaches and partnerships over regulatory frameworks, and the establishment of conservation frameworks which recognise that the protection and, where required, enhancement of indigenous biodiversity can be provided within pastoral based farming land uses and alongside pastoral based activities, and that these are not mutually exclusive.

Use these prompts to help you personalise your submission:
- Farmers tend to work across systems, rather than dealing with individual issues in isolation. Talk about your experience with this on your property. What would happen on your farm if you dealt with issues in isolation from one another, rather than looking at your farm as a whole.
- Thinking about your farm as a whole, what do you do to deliver economic, environmental, cultural and social benefits?

3.8 Identifying Significant Natural Areas:
(Discussion document page 31)

- I oppose the requirements on local authorities that the assessments have to be completed within 5 years. This is because it is unlikely that the technical expertise is available within New Zealand to be able to undertake the assessments appropriately including through on the ground verification of the...
- I seek that provision 3.8 is amended to enable local authorities the time to undertake this work in a robust manner. The ability for experts to work with landowners in identifying these habitats and in informing the ongoing management of these habitats within pastoral based land uses and activities, is an essential
significance of habitats, in partnership with landowners.

- While I support the establishment of a consistent approach to determining whether or not a habitat is significant, I oppose the broad reach of the currently proposed criteria as it is likely to capture all remaining indigenous habitats irrespective of whether they are significant i.e. they are rare, threatened, or at risk.

   element to providing successful and enduring conservation outcomes.

- Exceptions can be provided for but should be specified in the regional or district plan.

Use these prompts to help you personalise your submission

- Do you already have any significant natural areas on your farm? If so, how large are the SNA’s already on your farm and does their presence affect your management decisions? How?
- What would it mean to your farming business if all areas of native biodiversity on your farm were classified as SNA’s?

| 3.9 Managing adverse effects on SNA’s (Discussion document page 42) | • Amend 3.9 so that the provision relates to consent applications and the assessment of effects, and requirements to avoid, remedy, or mitigate the effects. New activities should be provided for where the effects of the activity on the attributes that underpin the habitats significance (such as representativeness, rarity, and distinctiveness) can be avoided, remedied, or mitigated.
- Amend provisions so that the ability to offset effects should only be provided for where the offset can occur in the same ecological area. The ability to offset an |
| Activity in the urban environment, onto the rural environment should not be enabled. |

**Use these prompts to help you personalise your submission**

- Are you considering new activities in areas adjacent to SNAs?
- How would the proposals affect this? In particular, how would you manage changes around weather such as drought, flooding; climate change adaptation; other pressures such as market; or other environmental issues such as water quality.

### 3.12 Existing activities in SNA’s

**Discussion document, page 49**

- I oppose the current proposal, but put forward the proposed changes.
- I seek that 3.12 be amended to specifically provide for the following activities within and adjacent to an SNA and areas identified as important for mobile species, where this is an existing activity:
  - Grazing of productive animals;
  - Pasture renewal;
  - Cultivation;
  - Vegetation clearance.
- I seek that 3.12 be amended so that the temporal and spatial nature of existing activities as part of pastoral based farming are recognised. Specifically, vegetation clearance, cultivation, or pastoral renewal, that may occur within a 7-year rotational basis, along with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods.
- I seek that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become SNA’s.
3.13 General rules applying outside SNA’s:
(Discussion document, page 51)

- I am concerned that 3.13 as proposed may result in areas of my farm around my SNA’s being ‘locked up’ from pastoral based farming activities. This could result in significant areas of my farm being impacted which ultimately would significantly impact my farm viability and resilience.

- I seek that 3.13 is amended to prioritise non regulatory, partnership, and landowner led approaches to managing areas around SNA’s in order to protect the attributes that make a SNA significant. I seek that clause (2) is deleted.

Use these prompts to help you personalise your submission
- What proportion of your farm could be ‘locked up’ under these provisions? What would this mean for your management decisions/ future viability?
- Do you think indigenous biodiversity would flourish/ increase in ‘locked up’ areas of your farm? If not, what do you predict would happen in these areas instead?

3.15 Highly Mobile Fauna:
(Discussion document, page 38)

- I oppose provisions which seek to mandate this protection through regulatory frameworks where this may impact on existing activities and land uses. Enduring and effecting conservation approaches to protect these species are best
achieved through working with landowners, and in particular the role of the expert in working with landowners to build understanding of these species, their values, and any management which is required for these populations to be healthy and resilient.

- Do you already take any actions to look after highly mobile fauna that visit/cross over your farm?
- Do you have any support from groups such as your council, community group, levy body to help you?
- Why do you get involved in this work?
- How would the introduction of mandatory rules affect your actions or behaviours?

Conclusion

- The elephant in the room is the "Money System" which affects every facet of our lives yet it is a mystery to almost everyone. From correspondence I have had, I am amazed but not surprised that even some in Treasury, Reserve Bank and a prominent professor of Banking at a University do not understand the basics of money creation which can be verified in irrefutable evidence from Royal Commissions on Banking, Hansards, Encyclopedia Britannica, Reserve Bank Archives and Official Records!

  Reserve Bank Statistics show - Half of our Gross National Product goes directly to the private banks each year to pay the interest and principal repayments. NZer’s have to exist on only half of what we earn as a Nation per year. (Total 2018 GNP was $173,553 million- half = $86.776 million.) Imagine if the NZ Government and Local Authorities had a portion of the $86 million to spend for the Public Good!!!

  Our “Money System” has been privatized. Except for notes and coins (2%) all money in circulation is created by private banks (98%). When a private bank creates a loan, 90% of that loan is created from nothing – it is a book-keeping entry which costs the bank approx half of one percent 0.5%, yet banks have the audacity to charge the full rate of interest on the whole loan!

  But it is worse – Ellen Hodgson Brown in her book "Web of Debt" puts it well - "When a private bank creates the loan, they only create the Principal but never the Interest to service the loan over its life. To find the Interest, new loans must continually be taken out, expanding the money, inflating prices and robbing you of the value of your money.” The Interest to service the loan is at leased twice the amount borrowed (loan) which causes a shortage because the INTEREST is NEVER CREATED. It is a HIDDEN TAX called INFLATION that continually transfers wealth from the 80% of those that have little to those that are very wealthy.
Everlasting Debt, Inflation, Business Cycles, Taxation and half a money supply is guaranteed under this Usury / Debt System of Legalized Larceny with its Built-in Shortage of Money! We are in Debt Slavery!

Money System and the Climate Change. The fact that private banks must continually expand credit (Loans) or else the economy goes into recession is the driving force – (the growth imperative) of our economy, which in turn is the Real CAUSE of the Human induced Climate Change, Environmental disasters and human suffering World Wide.

Simple Solution.

N.Z., showed the World how to get out of the Great Depression by using our Reserve Bank to create all the money needed for Central and Local Government Public Good requirements and without incurring a huge Debt. From 1936 till 1960s was a period of the greatest expansion and upgrading of our infrastructure, in the History of NZ using Reserve Bank credit and money from Taxation – i.e. housing, roads, hydro power, schools, hospitals etc, all built without incurring Debt or Inflation. Today because we use private bank credit (an I.O.U. which has to be paid back with Interest) cannot even afford to maintain them!

Finally.

I can supply much more detail on how our “Money System” has a detrimental impact on not only Farming and the Environment but as the American Economist said - “The whole world is drowning in Debt – Usury is destroying civilization.” It does not have to happen, we only need to search to see the solution in our History and Archives!

Add any final or summarising comments.

- Thank you again for the opportunity to comment on the proposed changes. I/We welcome the opportunity to further discuss any of the points above with the Ministry for the Environment and the Department of Conservation, should you wish for more information.

- For any inquiries relating to this feedback please contact [name of person or yourself who will deal with any enquiries] on [number, email address etc.].

Yours faithfully,

[Signature]

[Name]  [Date]  5/3/2020