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.
I have been farming here for about 30 years, with currently a mix of sheep and beef. During this time I have planted of trees, both native and exotic (no pines), fenced off several blocks of native bush and waterways, including my stretch of the Whanaki River. There are already two SNAs on the farm, the first came with ample consultation, the second with none at all which is disappointing. I, along with many of my peers, support the need for conservation, but am strongly in favour of an approach which encourages and supports people rather than using a ‘big stick’.
Submission

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

Background about my farm

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

- Where you are farming (catchment) and type of country you are farming (flat, rolling, hill);
- Has your family been farming your land for multiple generations? If so, how many?
- What type of farm;
- Stock class and ratio and whether or not this changes overtime;
- How long has the property been in your family and how long have you been farming the property;
- Property under development – future aspirations and motivations?
- Describe your environmental management? Are you actively planting riparian strips or allowing native regeneration, do you have QEII covenants, plantation forestry, manuka, wetlands or lakes?

Why am I making this submission?

- Why this is important to you in the big picture, the contribution you make to your natural environment and economic environment (employer, using local contractors etc.),
- Your values and aspirations for your area, community, catchment and family as they relate to indigenous biodiversity

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.

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.

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.

Personalise your submission by using the prompts in the text box below to help you.

- 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, etc.
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.

- Are there any specific impacts that the Draft National Policy Statement for Indigenous Biodiversity could have on your farm?
- Do you have areas of indigenous vegetation on your property?
- What type? Native bush, wetlands etc?
- If yes, how big an area/ what proportion of your farm?
- How do you think the proposals could affect future on-farm management decisions?
- 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?
- Consider what incentives, including financial; human resources; technical expertise; provision of indigenous plants, will help you to preserve biodiversity on your farm.
- Are there any changes to policy that would incentivise you to plant more native vegetation, such as climate change policy?
- Thinking about how you currently look after indigenous biodiversity on your farm, what initiatives have been most helpful to you? For example, QEII covenants, regional council advice, etc
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>
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<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>
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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 with amendments.
- I support the objective of local authorities recognising and providing for Hutia Te Rito which recognises the relationships between indigenous biodiversity and people and communities, and that conservation requires kaitiakitanga and custodianship.
- 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.

Use these prompts to help you personalise your submission

- Write about your connection to your farm, and the native biodiversity living there. Why do you feel this connection to your land?
- Hutia Te Rito uses the word kaitiakitanga and stewardship, consider whether you would these words to describe your feelings about your land.
- Have you taken any actions to look after the native biodiversity on your farm or in your catchment? Examples include protecting native bush through a covenant, pest control, fencing off native bush, planting natives. Why do you do these things?
- What government initiatives would encourage/enable you to undertake more of these types of ‘custodianship’ actions?

- I support objective 3.7.
- I seek that objective 3.7 is retained as notified.
3.7 Social, economic and cultural wellbeing:
(Discussion Document Page 45)

- I support the recognition that people and communities are critical to conservation actions and the protection and enhancement of indigenous biodiversity.
- 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 support with amendments.
- I support the identification of areas with significant indigenous plants and or species, by experts working with communities and in partnerships with landowners. This assessment should be undertaken in a consistent manner, with the significance of habitats verified or refined through an on the ground assessment, rather than just through reliance on spatial maps.
- 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.
- 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 element to providing successful and enduring conservation outcomes.
- I seek changes to provision 3.8 so that the significance criteria are amended so that habitats which are “rare” are identified, “at risk” are identified, or “threatened” are identified. Management frameworks can then be tailored to
within New Zealand to be able to undertake the assessments appropriately including through on the ground verification of the 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.

the level of risk that the habitat faces and the attributes that underpin the habitats significance.

- Amend provision 3.8 so that a habitat that is identified as “threatened” is only included if it is 0.25ha or greater and contiguous.

- Amend provision 3.8 so that a habitat that is identified as “rare” if only included if it is 0.5ha or greater and contiguous.

- Amend provision 3.8 so that a habitat that is identified as “at risk” is only included if it is 1ha or greater and contiguous.

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

- I seek any consequential amendments to ensure provisions are aligned in identifying and then establishing management frameworks specific to the risk status of the habitat e.g. “rare”, “threatened”, or “at risk”.

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)

- I support with amendments.
- I support requirements to manage new activities that effect significant natural areas.
- I seek that 3.9 is amended so that the effects management hierarchy is based on the level of the habitats significance e.g. whether it is “rare”, “threatened”, or “at risk”, and is tailored to the attributes
which underpin the habitats significance.

- 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)

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<tr>
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<th>I oppose the current proposal, but put forward the proposed changes.</th>
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<td></td>
<td>I support the intention of providing for existing activities but am concerned that 3.12 as proposed does not do this.</td>
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<td></td>
<td>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:</td>
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<td>o grazing of productive animals;</td>
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<td></td>
<td>o Pasture renewal;</td>
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<td>o Cultivation;</td>
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<td>o Vegetation clearance.</td>
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<td>I seek that 3.12 be amended so that the temporal and spatial nature of existing activities as part of pastoral based farming are</td>
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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 so that existing activities are provided for as a permitted activity. Where consents are required, then the effects of an activity should be assessed in relation to the attributes which underpin the significance of the habitat such as representativeness, rarity, and distinctiveness.

- I seek that 3.12 be amended to delete requirements to maintain or protect the ‘ecological integrity’ of a habitat, where the ‘ecological integrity’ of the habitat may have been impacted prior to notification of the NPSIB e.g. through existing impacts on the habitats ability to regenerate.

- 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.

Use these prompts to help you personalise your submission

- Do you have any SNA’s on your farm? How large/ what proportion of your farm is a SNA?
- How do you manage the SNA’s on your farm? Do you manage the land around the SNA’s? Think about pest control, planting, fencing, ongoing monitoring
- How would the proposal affect you? Think about costs, your ongoing management practices etc

3.13 General rules applying outside SNA’s:
(Discussion document, page 51)

- I support the intention of recognising areas around SNA’s as important for protecting SNA’s themselves and their values.

- I seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for.
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<th>Section</th>
<th>Comments</th>
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<tr>
<td>3.13</td>
<td>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. I seek that 3.13 is amended to prioritise engagement with the technical expert and landowner to co-design management frameworks for the farm which ensures that indigenous biodiversity is provided for as an inherent and integral part of the farming business. These plans can be provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.</td>
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**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?

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<tr>
<td>3.15 Highly Mobile Fauna: (Discussion document, page 38)</td>
<td>I support with amendments. I support the intention to recognise and provide for highly mobile fauna through non regulatory/partnership-based frameworks generally, and where I seek that 3.15 is amended to prioritise non regulatory, partnership, and landowner led approaches to managing mobile species and their habitat and lifecycle requirements.</td>
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required regulatory approaches in relation to new subdivision, and development.

- 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.

- I seek that 3.15 is amended to prioritise engagement with the technical expert and landowner to co-design management frameworks for the farm which ensures that mobile species is provided for as an inherent and integral part of the farming business. These plans can be provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.

- 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

- 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,

8 March 2020