
DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

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

On: Ministry for the Environment – draft National Policy Statement for Indigenous Biodiversity.

To: Ministry for the Environment
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Submission

Background about my farm

- *Our farm is a hill country beef farm on the [REDACTED], about 30 minutes north of Whangarei.*
- *It's [REDACTED]. The bush is in multiple blocks, some of which is fenced off, some of which is not. Most of the bush is in the gullies.*
- *We've been here just under 2 years and have had to spend a lot of time and capital on infrastructure and buildings on what was a run down farm that needed a new house, yards, sheds, etc. It's not the most productive farm and we are struggling to make a living from it, but it was all we could afford*
- *However, also in that time, we have put a trapping operation in place as we have kiwi in the bush and would like to see them breed and increase in number.*
- *In addition to trapping, we have fully fenced 2 block of bush totalling 42 ha as there are a lot of kauri in the bush. While we received funding from Northern Regional Council under a special kauri dieback fund and this covered the cost of the materials, we had to do supply the labour and tractor/post banger.*
- *We'd like to fence further blocks off, redo some of the old fences and fence off some of the water ways and a dam. However, there is a large costs in time and materials to do this and we simply can't afford to do anything further.*
- *We'd like more traps and would like a better possum eradication plan in place but again, it's time and money that we don't have. While Northern Regional Council supplied the traps we have, we have to supply the bait and labour.*
- *We all have a responsibility to maintain a balance in nature and preserve species, whether or not we are landowners or where we live.*

Section C: Specific responses to the proposals:

Specific Provision in the Proposed Plan	Submission	Decision sought
<i>The specific provisions my submission relates to are:</i>	<i>My submission is that:</i>	<i>The decision I would like MfE and DoC to make is:</i>
The entire policy statement and the entire discussion document	<p>The policy statement is different to the discussion document.</p> <p>The wording in both are either vague or too complicated for most ordinary people to understand.</p> <p>There is too much waffle in both documents making it extremely difficult to understand or know what the end result is.</p>	<p>There needs to be one statement only.</p> <p>Wording needs to be in clear, concise, plain English that anyone can understand.</p> <p>Remove the waffle and use clear, concise points that anyone can understand.</p>
Section 1.7 (3) Pg 9	<p>Definition of indigenous biodiversity says it includes all indigenous vegetation & fauna and that maintenance of indigenous biodiversity requires at least no reduction and may require restoration.</p> <p>However some indigenous species are at pest levels in some areas of NZ, eg pukeko and totara in Northland.</p>	<p>Add a clause in here stating that council have the ability to declare pest species and this clause does not apply to those species.</p>
Section 3.8 Identifying Significant Areas Pg 19 or Discussion Document Section B, B.1, Pg 31-35	<p>Will be impossible to have SNA's mapped within 5 years with current staff & limited funds without using desktop mapping .</p> <p>Desktop mapping likely to be inaccurate.</p> <p>Danger is that all indigenous vegation will be classed as significant to cover councils from a legal viewpoint and</p>	<p>Responsibility should be a collaboration between regional and district council, with the regional council taking the lead, as both are likely to already have some mapping in place and need to combine resources. Regional council more likely to have better knowledge of this type of thing than the district council.</p> <p>SNA's need to be finalised in conjunction with land owners to ensure mapping is accurate. This needs to be done via discussion and working together, not council telling landowners</p>

	<p>from all eventualities as the way it is worded at present is a subjective, not objective measure.</p> <p>Danger is that entire farms will be classed as SNA's where there are populations of fauna such as kiwi that cross pasture to get from one area of bush to another and feed from that same pasture.</p>	<p>what's included and landowners having to make submissions or go to hearings or the Environment Court to challenge this. The cost, time and skill set required for a formal submission process is unaffordable and unachievable for most people.</p> <p>Appendix 1 covers ALL indigenous vegetation, not just significant areas. What's a significant area? Needs to be a minimum area, cover and plant/fauna type specified. Also needs to be graded as High, Medium or Low with different rules applying to each grading.</p> <p>Managed farm pasture needs to be recognised as being of ecological value and part of biodiversity. Part of that is farmers still being able to earn a living so provision needs to be included that prevent farmers being put out of business.</p> <p>Extend the time frame from 5 years to 10 years. But provide certainty in the next year as to what will be included as an SNA as you are dealing with the incomes and homes of a lot of people – ie farmers.</p>
<p>Section 3.9 Managing adverse effects on SNA's Pg 21</p>	<p>1a states "the following adverse effects on the SNA are avoided"</p> <p>How is weed management going to be dealt with? If it's expected that weeds are to be controlled and/or eradicated, who is expected to pay for this?</p> <p>Are SNA's on farms expected to be fence off? If so, who is expected to pay for this?</p>	<p>Reword to say "... avoided or mitigated"</p> <p>Provision needs to be made for how SNA's are to be managed in practical terms, eg fencing, weed control.</p> <p>Who has to fund managing SNA's needs to be addressed.</p>

<p>Section 3.12 Existing activities in SNA's Pg 23</p>	<p>How No 4 is worded at the moment will have the effect of stopping anything happening because councils will be covering themselves.</p> <p>Can council requiring a resource consent for farming full stop the way this is worded, again to cover themselves.</p> <p>Not easy for someone who has purchased a farm recently to prove there has been a regular cycle of clearance.</p> <p>Where is the line drawn between maintenance vs clearance? Eg totara come up like weeds in Northland in the middle of paddocks and need regular removal. I can see the way this is worded will prevent this happening so eventually an entire paddock will be covered in totara, in between which gorse will come up and the paddock will just end up in a mess, ie won't be productive and won't be what most of us would class as an SNA either.</p> <p>Can see this having the effect of areas being overrun with gorse, blackberry, woolly nightshade and all manner of weeds.</p>	<p>I doubt I can come up with rewording government would be satisfied with so I won't try.</p> <p>Not good enough to open up the way for farming to become a resource consented only activity given the costs of applying for a resource consent and all the reports that will be required to support it. It is simply unaffordable for most of us.</p> <p>End result of this will be large corporate farms will be the only ones to survive as no one else will be able to afford the compliance. Will have the effect of displacing a lot of smaller farmers – to do what and live where?</p> <p>May well have the opposite effect of managing biodiversity as corporate farmers there to make money, not spend time and money doing things like trapping or worrying about looking after small populations of kiwi.</p> <p>Small number of corporate farms not good for future food supply. Much better to have a larger number and a wider variety.</p>
<p>Section 3.13 General rules applying outside SNA's Pg 24</p>	<p>Basically this give councils complete control over farms such as ours where there are large areas of bush in numerous locations with paddock in between, where the paddock area is going to be caught too.</p>	<p>Remove "specify" from wording.</p> <p>Council need to work with land owners, not tell them what to do. We paid for our farms and they are what we earn our living off and as such we need to run them as we see fit.</p> <p>Needs to be worded and managed so this is not a land grab by government without any compensation. Also see comments below re Section 3.15.</p>

		<p>Alternatively, government needs to consider buying severely impacted farmers another farm or paying a manager salary to enable people to stay on their farms.</p> <p>Do not expect farmers to pay council for being able to continue to farm – this is simply unaffordable as noted previously.</p>
<p>Section 3.15 Highly mobile fauna Pg 25</p>	<p>I presume highly mobile fauna includes water fowl and some of their habitat will fall under the biodiversity policy, while some of it will fall under the freshwater policy.</p> <p>Wording vague in No 4. Open to councils to do whatever they like, regardless of how it impacts farmers. Likely this will mean farming will end up being a resource consented activity only.</p> <p>Lack of resources to carry out surveys likely to result in blanket areas classed as being habitate when in actual fact this may not be the case.</p>	<p>Impossible to submit on this properly without know what the freshwater policy is and how the two policies will work in conjunction with each other.</p> <p>Provision needs to be made so that councils develop plans & identify species and habitat in conjunction with land owners, not council telling people what species are there, what to do & how to run their farms. Needs to be done via working together, not via council coming up with a plan and land owners having to go through a formal submission process to challenge this. The cost, time and skill set required for a formal submission process is unaffordable and unachievable for most people.</p> <p>Discussion document make reference to provision for having to apply to DOC when they might disturb fauna. This is not in policy statement. If it applies, then it needs to be included in the policy statement. However, I think it should be removed – it’s silly to have DOC having one set of rules and councils having another. One is enough.</p>
<p>Section 3.16 Restoration and enhancement Pg 26</p>	<p>No 3 in particular gives councils the ability to force land owners to restore wetlands and SNA’s.</p>	<p>There is no mention of how this is to be achieved or funded. There is a large time and cost element here and a lot of farmers simply don’t have the resources. This needs addressing.</p>

<p>Section 3.17 Increasing indigenous vegetation cover Pg 27</p>	<p>Won't be practical to map areas properly due to time and funding constraints, so desktop mapping will have to be used and this can be very inaccurate.</p> <p>Can see this applying to all landowners, and for those of us that already have a very large area of indigenous vegetation, this is going to not going to be practical.</p>	<p>Again, council needs to work with landowners, not just rely on desktop mapping and expect inaccuracies to be dealt with by land owners through a formal submission process after the fact.</p> <p>Needs to be an overall approach, not expect each individual landowner to increase cover by a certain percentage. How it is worded at present disadvantages those land owners who have already preserved bush, etc, and advantages those who have cleared everything.</p> <p>Policy as it stands at present encourages land owners with large areas of bush, etc to embark on wholesale clearing now, before this becomes law, which has exactly the opposite effect of what is desired.</p>
<p>Section 3.19 Assessment of environmental effects</p>	<p>No 3 b – says must be classified as High or Medium – what about Low?</p>	<p>Grading should be High, Medium or Low, not just High or Medium.</p>