

[REDACTED]

NPS IB Submission Dana Haszard March 2020

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

To: Ministry for the Environment

Personal Information

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Submission

- I thank you for the opportunity to provide feedback on the proposed National Policy Statement for Indigenous Biodiversity which I make on behalf of my husband David Haszard and myself.

Background about my farm

Our farm is located in the [REDACTED]. Of the [REDACTED] land approximately [REDACTED] has been fenced for the protection of natural habitat.

When we purchased the farm [REDACTED] land use was mainly maize cropping and market gardening with a small portion of pasture for cattle grazing. Within the first year of ownership we fenced off the areas of natural habitat. More recently, with guidance from the Taranaki Regional Council all streams and a significant river boundary have been fenced to exclude stock. Riparian planting is well established. We continue to manage and enhance such plantings.

The land was gradually returned to pasture, and is currently leased for dairy farming in conjunction with a neighbouring farm. The relatively small herd is managed for split calving (winter-milk supply). The retained land is a mix of grazing land, fenced off riparian development and natural areas including an SNA of approximately 2.5 hectares. The relatively low stocking ratios, the shelter provided by indigenous and exotic trees as well as hedge shelter in most paddocks ensures that the business of farming occurs in an environment which respects the needs of the stock, the land and the indigenous biodiversity. This land use is likely to continue into the near future at least.

Why am I making this submission?

I am making this submission because I am proud of the progress that has been made in Taranaki since 1996 under the 'Transforming Taranaki' Riparian Management Programme. The principals and practices employed in this programme ensured the Taranaki Regional Council was able to develop effective relationships to work to achieve its targets. Such achievements indicate the value of cooperation and the ability of regions to incorporate local knowledge and initiative to establish effective systems to manage the environment.

Section A: General responses to the proposals:

- 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.
- It is important to acknowledge that New Zealand sheep and beef farmers have retained 2.7 million hectares of indigenous habitat within their farms. These farmers and many other landowners, should

be regarded as the proven willing partners in the determination to preserve natural flora and fauna rather than as owing a debt to the country for land that was cleared by previous generations for the development of the highly successful farming industry. A punitive attitude could have a serious impact on morale and in some cases potentially undermine existing and future conservation efforts.

- I support provisions which recognise that enduring conservation actions require landowner and community support and leadership. All conservation actions, whether to protect, mitigate, enhance or maintain natural areas require local knowledge and have inherent costs to plan and expedite. Recognising the importance of people to the ongoing success of conservation is vital. Many communities around the country take a pride and 'ownership' of the targets for eradication of pests and restorations of biodiversity on public land. Similarly on land around the country individuals, often in isolated areas, work alone or in small groups on their own land to improve and manage land for future generations. It is important to respect and refer to the experience and knowledge of these widespread contributors to conservation.
- [REDACTED] we considered the natural areas an important feature of the landscape and we prioritized fencing to exclude stock from several hectares of indigenous habitat. Along with more recent riparian fencing and planting, the natural areas on our farm from which stock are excluded now amount to [REDACTED] % [REDACTED]
- I am concerned with any provisions which seek to 'lock up indigenous biodiversity' and in so doing penalise those landowners who, like us had the desire and took appropriate actions 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. While the riparian and natural areas on our farm that are fenced are all on prime flat land they enhance the general landscape of our area, provide shelter for grazing land on many parts of the farm and over the time we have enjoyed seeing and hearing the increase in the bird population and the regeneration of the flora that has occurred. Ongoing conservation should be supported and incentivised. The pest control programme, administered in Taranaki by the Regional Council, provides support and monitoring but the landowner carries the responsibility, the expense and potentially the penalties, for ensuring pest control is carried out regularly and effectively. It is important that landowners who have already demonstrated their respect for the indigenous biodiversity, often over many generations, don't feel impeded by a structure that lacks both support and respect for their conservation record and uses a strong regulatory approach to impose its demands upon landowners.

Section B: Impacts and implementation:

- While we have been keen to protect the stands of indigenous biodiversity on our land it is of concern to us, now that one area has been defined as an SNA, what the potential impacts of these proposals may be. It is of concern that adjacent land or nearby habitats of highly mobile species may cause restrictions to the farming practices and inevitably adversely affect the farming business. The provisions could be interpreted as precluding the ongoing grazing of animals adjacent to and within these areas. This has the potential to adversely affect those landowners who have done the most to protect indigenous habitats and species within their farming businesses: It is somewhat ironic that there is an expectation they shoulder the greatest costs as well as possible restrictions to their farming businesses.
- Without further detail it is unclear where the compliance costs of the various proposals will fall. Identification of these habitats and species, fencing and ongoing pest management involve considerable additional costs and time. To date, riparian establishment and maintenance costs incurred on our small farm are in the region of [REDACTED] without taking account of landowners' own labour input. Ongoing maintenance in the form of weed control, plant care and pruning to maintain effective operation of electric fences will mean that farm budgets will need to incorporate this increase in costs into the future. 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 not only to areas where indigenous biodiversity is being restored, but also to where it currently exists.
- The support provided by the Taranaki Regional Council to landowners for riparian fencing and development has been a major factor in the success of the project on our farm: The support included on site meetings, planning advice and recommendations, assistance with plant selection, plant sales, ongoing provision of maps detailing progress and the ultimate targets. While still involving some considerable cost to fence, establish and maintain, the support has enabled the work to proceed within an encouraging environment and increased our knowledge about riparian development.
- 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. 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.
- The specific provisions of the proposal that this submission relates to and the decisions it seeks are as detailed in the table below.

	<ul style="list-style-type: none"> • 	
<p>3.8 Identifying Significant Natural Areas:</p>	<ul style="list-style-type: none"> • 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 level of significance of habitats verified or refined through an on the ground assessment, rather than just through reliance on spatial maps. Following identification of an SNA on our farm it was clear to us that the desk top defined area extended to include non-indigenous trees. This was verified by an onsite assessment and the boundaries were adjusted. In our case it was a relatively minor adjustment but it is evidence that the desk top method is not sufficiently accurate. Mutual respect for and trust in the identification process is more likely to develop and be maintained if such onsite assessments are readily available. • 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. I consider it important to apply a realistic minimum area criteria of 1 ha and contiguous, to any areas that are to be considered for a 	<ul style="list-style-type: none"> • 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 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.

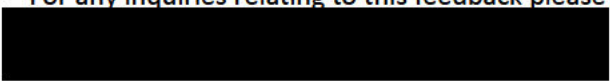
	<p>risk status assessment. If further smaller areas of natural biodiversity are to be assessed on our land I would hope that a minimum area for any such assessment would apply and that the criteria of 'rare' 'at risk' and 'threatened' be used as benchmarks. As on our farm and many farms, land contour and natural biodiversity have been factors in farm planning to ensure shelter, shade and the general landscape quality. Any regulations extended to numerous smaller areas should be carefully considered.</p> <ul style="list-style-type: none">• I oppose requirements on local authorities that the assessments 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 on the ground verification. I am aware from our own experience of the time the process takes for identification of an LSNA to ground- truthing the SNA. Further time is required for updating such changes and recording them on the council plans. While the systems may become refined, the increase in numbers of areas of natural biodiversity to assess and process is likely to increase significantly. Territorial authorities and councils are unlikely to have the flexibility to increase resources to manage the assessments within the suggested time frame of 5 years.	<ul style="list-style-type: none">• 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".
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<p>3.9 Managing adverse effects on SNA's</p>	<ul style="list-style-type: none"> I support requirements to manage new activities that affect significant natural areas. For landowners like ourselves with small stands of indigenous habitat across our land, a one size fits all application of an adverse effects policy could be unnecessarily restrictive when a landowner is wishing to undertake new activities on the land. 	<ul style="list-style-type: none"> 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.
<p>3.12 Existing activities in SNA's</p>	<ul style="list-style-type: none"> I support the intention of providing for existing activities but am concerned that 3.12 as proposed does not do this. The four activities of grazing, pasture renewal, cultivation and vegetation clearance are integral to farm management, in whole or in part. To have restrictions placed on such activities will adversely affect farm management. Whether the decision to apply any of the four activities is part of a long term farm management plan or made in response to a natural event such as flood or drought, a landowner should be permitted to effect in a 	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> ○ 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

	<p>timely manner, without concern for regulation, any of the four named activities.</p>	<p>basis, along with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods.</p> <ul style="list-style-type: none"> • 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 restrictions on the ability to undertake an existing activity in areas which have become SNA's.
<p>3.13 General rules applying outside SNA's:</p>	<ul style="list-style-type: none"> • I support the intention of recognising areas around SNA's as important for protecting SNA's themselves and their values. • There is an SNA on our farm of approximately 2.5 hectares. This area has been fenced to exclude stock since we purchased the land in 1986. There are several other small areas also fenced to exclude stock. These natural areas provide shelter and shade and enhance the landscape. They appear to have thrived during the time of our tenure. I would hope that the requirement for natural biodiversity protection around SNAs and small areas of natural habitat, would recognise the evidence of historic and prevailing landowner care of natural habitat and take this into consideration with any co-designed management frameworks. 	<ul style="list-style-type: none"> • I seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for. • 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.

<p>3.15 Highly Mobile Fauna:</p>	<ul style="list-style-type: none"> • I support with amendments. • I oppose provisions which seek to mandate this protection through regulatory frameworks where this may impact on existing activities and land uses. Protection of these species is best achieved through working with landowners. Knowledge is an important component of commitment. Mutual respect which recognises the experts' understandings and acknowledges landowners' willingness to continue to provide an appropriate environment for biodiversity, provides a healthy context for ongoing protection of species. 	<ul style="list-style-type: none"> • 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. • 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.

Conclusion

- It is my hope that the policy makers will consider the views expressed in this submission. The personal views are based on observation of the areas of protected natural areas on our land, my awareness of increasing concerns for the state of the environment and my own experience of adapting to an increasing need to comply with local and regional policies for management of land. In my experience well planned, informative, personal communication, which provides guidance and support alongside a range of expectations is the way to engage landowners. Incentives and compensation which recognise the contribution from landowners would be a welcome addition.
- Thank you again for the opportunity to comment on the proposed changes. I 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 me to deal with any enquiry on 

Yours faithfully,



Date: March 9, 2020