INDIVIDUAL SUBMISSION
ON PROPOSED NATIONAL POLICY STATEMENT
FOR INDIGENOUS BIODIVERSITY

TO: MINISTRY FOR THE ENVIRONMENT
   indigenousbiodiversity@mfe.govt.nz

DATE: 01 March 2020

Submitter’s Name and Contact Details

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Mai i ngā rekereke o Koro Ruapehu
Tēnei te reo maioha me te mihi kau
E rere nei ki kautau i runga i ngā tini āhuatanga o te wā.
I runga anō i ō tātau mate o te wā.
Huri te pō, nau mai tea o.

Introduction

Ātihau-Whanganui Incorporation (Ātihau) looks after 42,000 hectares in the Ruapehu/Whanganui district and is farmed on behalf of the 9000 shareholders which descend from the original owners.

Biodiversity on my farm

Of the 42,000 owned by the incorporation, approximately 22,000 hectares is in pasture, 8000 hectares in mānuka, 3000 hectares in plantation forestry and the remaining 9000 hectares in native bush, of which 4000 hectares is protected under Ngā Whenua Rāhui Covenants.

Native bush across the incorporation varies from pockets that exist in a pre-European state having never been milled, to large stands of regenerating but cut over bush, to scattered scrub across farmland.

There are a number of significant natural areas across the incorporation which have been mapped by Horizons regional council. These are predominantly untouched wet lands, and an area of native bush where a unique fungi grow. The majority of these areas are protected under Ngā Whenua Rāhui Covenants.

There is also a kiwi sanctuary on the property which has over 300 traps on it. These traps are checked monthly.

In the future Ātihau has plans to increase the amount of native bush on the property with a focus on water ways and steeper areas that are not suitable for farming, mānuka or plantation forestry. As part of this Ātihau would like to create a corridor between the Whanganui and Tongariro National Parks and we have received some funding through the one billion trees program to assist with this.

Biodiversity, both plant and animal would also be improved in the future if more resources were available to control pests, specifically deer, goats, stoats, cats and possums.

Native bush and wetlands across the incorporation provide shelter for stock, and filter water before it enters a stream of river. In the future though Ātihau may wish to use these areas for a number of reasons, including but not limited to a tourist operation, sustainable timber production, oil production or tea production.
How the NPS will impact my farm

Ātihau has some concerns with the proposed national policy statement for indigenous biodiversity.

**Mapping of Significant Natural Areas (SNAs) (NPSIB section 3.8)**

Ātihau is concerned that a standardised definition of SNAs may result in most indigenous vegetation being identified as significant. This would have significant impact on the ability of Ātihau to manage its land in the future.

Ātihau believes the intention should be to capture the most iconic and highly valued indigenous biodiversity, and that regional definitions SNAs is more likely to achieve this.

Ātihau believe that standardisation as an approach is Eurocentric in origin and a tikanga Maori lens should be applied to ensure that localised approaches are employed.

Standardisation also implies that all landowners are poor managers of biodiversity. Ātihau believes that our track record shows consistent efforts have been made to manage biodiversity through the application of a tikanga Maori view to ensure that the tupuna kuia (the land) and tuakana (the flora and fauna) are looked after.

**Management of adverse effects (NPS sections 3.19 & 3.13)**

Ātihau is concerned that the requirements associated with the management of adverse effects related to new activities within SNAs will limit the ability of Ātihau shareholders to access their whenua in large numbers and will limit the ability of Ātihau to use these areas as part of tourism ventures.

Ātihau is concerned that it may be difficult to prove that existing activities within a SNA have occurred, if these activities have not occurred for some time (3.12 of NPSIB). And because of this the future undertaking of what Ātihau believes to be an existing activity may be prohibited.

Ātihau is concerned that the areas outside of an SNA may be treated as an SNA. This could limit Ātihau’ s ability to intensify land adjacent to an SNA.

**Restoration targets & Regional Biodiversity Strategies (NPS sections 3.16-3.18)**

Ātihau is concerned that restoration initiatives could now be considered part of a council’s legal obligation to maintain biodiversity. This potentially gives legal grounds for imposing requirements on farmers to actively manage pests and weeds, fence of SNA’s and complete other costly restoration actions.

Ātihau believe that the national policy statement for indigenous biodiversity should specifically state that restoration initiatives are to be non-regulatory and should focus on supporting landowners and community groups with their conservation efforts.

**Costs to Councils and Landowners (Section 32 Evaluation and Cost Benefit Analysis)**
Ātihau is concerned the cost-benefit analysis has not fully considered the cost to landowners. Ātihau believe that under the proposed national policy statement for indigenous biodiversity the cost implications both in terms of implementation costs, and loss of future earnings could be substantial, and would limit Ātihau’s ability to achieve its own biodiversity targets.

**Conclusion**

Ātihau supports the intent of this policy to protect indigenous biodiversity. However, without further clarification regarding the concerns aforementioned, the proposed national policy statement for indigenous biodiversity will place unnecessary and onerous restrictions upon Ātihau and thereby inhibit Ātihau’s ability to achieve its own biodiversity targets.

Ātihau thank the Ministry for considering our views

Ngā mihi, nā

Andrew Beijeman