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## Blank 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:

1. Review the [Draft National Policy Statement for Indigenous Biodiversity](#).
2. Have a look at some of the factsheets and other documents that B+LNZ has prepared that you may wish to draw on: <https://beeflambnz.com/npsbiodiversity2020>

Once completed, email your submission to [indigenousbiodiversity@mfe.govt.nz](mailto:indigenousbiodiversity@mfe.govt.nz).

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## 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

### Personal Information

*\* indicates required fields*

Company name: [REDACTED]

Given names\*: [REDACTED]

Surname: [REDACTED]

Contact person: [REDACTED]

Address: [REDACTED]

Region\*: Northland

Country: New Zealand

Phone: [REDACTED]

Email\*: [REDACTED]

## Submission

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

## Background about my farm

- We are farming [REDACTED] hectares in the [REDACTED] in Northland on flat, rolling and some hill country. Approximately [REDACTED] hectares is native trees.
- The family has been farming this land for 120 plus years.
- Currently farming [REDACTED] sheep, [REDACTED] beef. Has changed over time from dairy, cropping, sheep and beef.
- We are continuing our family's land caretaking management. E.g. majority of waterways fenced off 30 years ago, plus some areas of native trees.

## Why am I making this submission?

- We are concerned we may lose control of our land and our financial stability, potentially reducing our viability for us now, and our children in the future.

## Section A: General responses to the proposals:

*I support the theoretical goal of the proposal to recognise the value of indigenous biodiversity in New Zealand.*

*New Zealand farmers for many generations have been proactive in protecting indigenous habitat on farms, which shows they are custodians of indigenous biodiversity. My great grandparents started our conservation programme which is now approximately 20% of our farm in either bush or wetland.*

*Indigenous biodiversity should be considered as an asset to the farming business, not as a liability. Subtle but significant changes to this policy are required to reward existing conservation efforts and on going conservation should be supported and incentivised.*

*A strong (big stick) approach could undermine existing and future conservation efforts by farmers.*

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## Section B: Impacts and implementation:

*I am deeply concerned about the potential impacts of these proposals on my farm in relation to areas being identified as Significant Natural Areas. With the Significant Natural Areas not yet identified it is hard to assess the potential costs to us for compliance (fencing, pest control, weed control, lost production). Identification of Significant Natural Areas needs to engage landowners to build understanding and knowledge of the local conservation efforts.*

*The compliance costs are likely to be significant, more than is financially viable for farmers. Government financial assistance will be required by the farmers and councils for staff to be trained, let alone implement regulations.*

*With my understanding of the implementation time frame, there will be a problem, as the extent of technical expertise that will be required to implement this regulation is not available.*

## 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>
<b>Hutia Te Rito</b>	<p>We support with amendments</p> <p>We support provisions which recognise and empower landowner led conservation actions, and which prioritise non regulatory over regulation management frameworks.</p>	<p>We seek that the term “stewardship” is replaced with “custodianship” which more correctly reflects the values we place on indigenous biodiversity within our farm and as part of my family’s history and our future, and our relationship and ties to our land. The flora and fauna on our property reflect the effort of generations and as finances allow more conservation will be undertaken.</p>
<p><b>3.7 Social, economic and cultural wellbeing:</b> (Discussion document, page 45)</p>	<p>We support provisions which empower and support landowner conservation activities and recognise that the maintenance of indigenous biodiversity can occur while still providing for use and development.</p>	<p>We 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 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.</p>
<p><b>3.8 Identifying Significant Natural Areas:</b> (Discussion document page 31)</p>	<p>We oppose the requirements on local authorities that the assessments have to be completed withing 5 years due to the lack of technical expertise available in New Zealand.</p> <p>While we support the establishment of a consistent approach to determining whether a habitat is significant (through an on ground assessment, rather than reliance on</p>	<p>We seek that provision 3.8 id 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</p>

	<p>maps), 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. This could threaten our farm's economic viability. Animal welfare will be compromised if access is denied.</p>	<p>successful and enduring conservation outcomes.</p>
<p><b>3.9 Managing adverse effects on SNA's</b> (Discussion document, page 42)</p>	<p>I support, with amendments, requirements to manage new activities in significant natural areas.</p>	<p>Amend 3.9 so that the provision relates to consent applications and the assessment of effects, and requirements to manage, remedy, or mitigate the effects. The ability to offset an activity in the urban environment, onto the rural environment should not be allowed.</p>
<p><b>3.12 Existing activities in SNA's</b> (Discussion document, page 49)</p>	<p>We oppose the current, but put forward the proposed changes.</p>	<p>We seek that 3.12 be amended to specifically provide for the following activities within and adjacent to a significant natural area and areas identified as important for mobile species, where this is an existing activity: Grazing of productive animals; Pasture renewal; Cultivation; Vegetation clearance. We seek that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become significant natural areas.</p>

<p><b>3.13 General rules applying outside SNA's:</b> (Discussion document, page 51)</p> <p><b>Due to a computer glitch not allowing us to type in squares to the right –</b> We oppose 3.13 as area size around and SNA is not defined. This can cross property/farm/sector borders. Area outside of an SNA can become treated as an SNA. I am concerned that 3.13 as proposed may result in areas of my farm around any SNA's being 'locked up' from pastoral based farming activities. This could result in significant areas of my farm being impacted with ultimately would significantly impact on my farm viability and resilience.</p>		
<p><b>3.15 Highly Mobile Fauna:</b> (Discussion document, page 38)</p>	<p>We 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</p>	<p>We 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.</p>

	values, and any management which is required for these populations to be healthy and resilient.	

## CONCLUSION

- Our family of 5 generations (120 years) on this land have always endeavoured to do some conservation. It has been at our cost, with no financial support. It is time this was recognised and rewarded, not punished by potential cost or land seizures. Councils are not trained in this field and any such training or empowering will be at a cost to everyone in extra rates. Farmers do not have bottomless pits of money. We are caretakers of the land and we are the ones who had the vision to leave tracts of native bush long before conservation was thought of. We as farmers have feelings and deserve a decent life unencumbered by this sort of regulatory stress.
- Thank you again for the opportunity to comment on the proposed changes. 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 [REDACTED] on email at [REDACTED]

Yours faithfully,

[REDACTED]

11.03.2020