

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

Given names: [REDACTED]

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Contact person: [REDACTED]

Region: Canterbury

Email*: [REDACTED]

Submission

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

Background about my farm

My husband and I farm in the Canterbury region of New Zealand. The property is considered to be rolling foothill country. This sheep and beef farm have been in the family since 1973 and we are the second generation on the farm with the third generation very interested in taking over the reins in the near future.

We are currently stocked at about [REDACTED] sheep and [REDACTED] beef and this has remained steady for quite some time as this balance of stock ration works well for the farming system we have.

There are no immediate plans to develop any further land into the farming system as we like the balance we have. We currently have about [REDACTED] in forestry trees and areas with wetland values.

To date we haven't gone for a QE11 conversance as we have paid for and done all the fencing and weed control on the areas, we protect ourselves. While some of the wetland area has been fenced off, some has been left so that we can use the stock to help with the weed control, some of these areas are great shelter during lambing. If for some reason in the further we did not stay on the farm we would go for a QE11 to protect the areas we have looked after.

Why am I making this submission?

While I understand the Government needs some regulations to set standards etc, I do not believe that a one size fits all is needed. Certain values in each region should be looked at and how the community has worked to achieve these outcomes. Yet again it seems that those who have been early adoptors of environmental values and those that have protected what they believe are being slapped with rules. We are the very people you should be helping out and encouraging to continue with this work. We know how the land works and what is needed to continue to protect what we have for future generations. Some of what is being proposed will see the very demise of what we have achieved because of the lack of understanding at a local level. In our case would be the loss of habitat the very thing we have been protecting. You would make us into rule breakers just so we could continue to protect the indigenous biodiversity.

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.
- 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.
- We have been lucky on this farm to have areas of nature that we have been able to care for and look after. Areas have been fenced off and woody weed species have been controlled. We have reticulated water throughout the farm now after much hard work to ensure that where it is not possible to fence that stock have other water options and stay out of the wetland areas. Where possible riparian areas have been fenced and planted and some of these are 30+ years old. We also use stock in some areas around the farm to help control invading weeds, sheep are good for the low soft weeds and cattle in the summer months for controlling the woody weeds, especially Sycomore. Without this some of the areas would have been lost already to invading species of weeds. Annual mowing is also done to stop invading weeds. We have Spreadmark ground spreaders for our fertiliser applications to be sure the annual fertiliser is going exactly where it needs and not anywhere else. The tussocks are great for lambing as stated earlier and local people admire our hard work.

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 (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.
- In terms of the indigenous biodiversity we would say that we have above [REDACTED] has that have some form of indigenous biodiversity intergrated into the farming system. With another [REDACTED] fenced off and [REDACTED] of trees where fauna could use it as they migrate in the spring and autumn. The total area of this farm is [REDACTED], so we could be very adversely affected depending on the outcomes of this document and how is could be interpreted by councils. If we lost the use of the [REDACTED] that would mean the loss of [REDACTED] (we currently run [REDACTED]). Which would mean an average reduction in lambs by [REDACTED] per year. Wool production loss of [REDACTED] per year, so in todays terms that would be an income loss of [REDACTED] (gross) per year. In turn that would also mean that the tussocks would not be grazed, the weeds would not be controlled and the woody weeds would invade as the cattle would not be able to graze the area either. In my view within 10 years the habitat would be lost to invaded species and we would have a weed problem. (We don't like using chemicals to control weeds).
- It would be better is we could have people to help out on occasions and give good advice when we seek it. Money would help pay for trees, shrubs and fencing costs.

- Its about working with the land and the people so that both thrive.
- We are so lucky to have a beautiful space to enjoy and for others to see and yet with proposed document it feels like a stick not a carrot. Why should those who care pay the highest price, we are worked really hard already to preserve not destroy.
- 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:

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>
<p>Hutia Te Rito (Discussion document on a proposed National Policy Statement for Indigenous Biodiversity, page 23)</p>	<ul style="list-style-type: none"> • I support with amendments. • I support provisions which recognise and empower ground up, landowner, which prioritise non regulatory over regulation management frameworks. 	<ul style="list-style-type: none"> • 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.
<p>As custodians of this farm we have been able to look after the special features that make this farm what it is. There is nothing better than being able to work with the land and the sense of great pleasure it brings. The biodiversity here makes the farming system here special, we farm the animals the animals help to maintain the biodiversity.</p> <p>Over the years we have fenced off areas, planted many shelter trees and fully reticulated the water system around the farm so stock can have access to easier water. The stock help to maintain invading weed species when they graze the areas and this in turn protects the special areas.</p>		

<p>3.7 Social, economic and cultural wellbeing:</p> <p>(Discussion Document Page 45)</p>	<ul style="list-style-type: none"> • I support objective 3.7. • 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. 	<ul style="list-style-type: none"> • I seek that objective 3.7 is retained as notified. • 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.
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Our farm is run as a whole farming system, it won't work well if it becomes broken up and disjointed. To isolate areas that are in an intergrated paddock system would be very difficult if not possible and would result in the shutting of the gate in some paddocks. This would mean that not only is there the loss of stock running compacity, but that the weeds would invade within a very short time.

<p>3.8 Identifying Significant Natural Areas:</p> <p>(Discussion document page 31)</p>	<ul style="list-style-type: none"> • 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 	<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
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	<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>the level of risk that the habitat faces and the attributes that underpin the habitats significance.</p> <ul style="list-style-type: none"> • 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. • 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”.
<p>3.9 Managing adverse effects on SNA’s (Discussion document page 42)</p>	<ul style="list-style-type: none"> • I support with amendments. • I support requirements to manage new activities that effect significant natural areas. 	<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. • 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

		<p>area. The ability to offset an activity in the urban environment, onto the rural environment should not be enabled.</p>
<p>3.12 Existing activities in SNA's (Discussion document, page 49)</p>	<ul style="list-style-type: none"> • I oppose the current proposal, but put forward the proposed changes. 	<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 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

		<p>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.</p> <ul style="list-style-type: none"> 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: (Discussion document, page 51)</p>	<ul style="list-style-type: none"> 	<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.
<p>3.15 Highly Mobile Fauna: (Discussion document, page 38)</p>	<ul style="list-style-type: none"> 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 required regulatory approaches in relation to new subdivision, and development. 	

	<ul style="list-style-type: none">• 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.	
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Conclusion

- 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 [REDACTED] at [REDACTED]

Yours faithfully,

10 Mzrch 2020