



1. This submission is on behalf of the Northland Fish and Game Council on the proposed National Policy Statement on Indigenous Biodiversity.

2. The Northland Fish and Game Council is the statutory organisation with the responsibility of managing sports fish, game birds, and their habitats in the Northland Fish and Game region, which is contiguous with the boundaries of the Northland Regional Council.

3. Given relatively low sports fishery values, the primary focus of much of Fish and Game's work in Northland is on wetlands, and wetland restoration for indigenous and introduced game birds. In almost all cases, providing habitat for introduced game birds (Schedule 3, Wildlife Act 1953) provides habitat for indigenous biodiversity including indigenous game birds, plants, protected and threatened bird species and indigenous fish species as well as there are few (if any) noted species interaction issues.

4. Thus, Northland Fish and Game's focus is primarily on ensuring that there are no unnecessary barriers to restoring wetlands created by the proposed NPS. A review of the document shows that it currently prevents few major issues; however, it could better reflect the reality of New Zealand's species composition - with many introduced and naturalised species present which do not meet the usual tests of a "pest" species.

5. This also includes concerns about the status of land under the Reserves and Wildlife Act which allows for active management including the use of machinery to manage, maintain and enhance habitats. Wildlife Management reserves were established for the purposes of wildlife management and not to be closed off.

6. Fish and Game can provide many examples where after active management including the reestablishment of water tables and allowing for manipulation of water has provided opportunities for other forms of indigenous biodiversity to prosper. Plants that were once considered to be threatened or perhaps even extinct from a location have been found to come back once the habitat had been recreated from a drained paddock or swamp into a functioning wetland. The seed source was always there it just needed the right conditions to be able to germinate.

7. The proposed NPS, whilst having the right intent, could easily have detrimental outcomes in practice if it attempts to draw arbitrary lines around natural and dynamic systems. Wetlands are the classic case.

8. Having a non-expert from a regional council or someone who has a particular bias or interest could effectively prevent projects from commencing or even allowing for ongoing management which will seriously deplete and threaten indigenous biodiversity.

9. Unless New Zealand is prepared to remove hard structures on floodplains - i.e. stop banks which contain rivers and stream and allow for the inundation of the valley floors along with the ability for rivers to wander at will as they once did, rather than just shutting up areas that are left will result in a significant reduction in indigenous species over time. We won't because it all means a loss of valuable farm production and forestry horticultural land. A farm needs active management, and just as the national, regional and district government and communities manages indigenous forest with pest plant and animal control. We don't lock these areas up and let them look after themselves in fact we encourage active management both from a landowner's perspective and also with volunteers and the community groups are prepared to fund significant amounts of money and resources towards this. Wetlands need the same, noting that the biodiversity available in a square metre of wetland is significantly greater than in a forest.

10. However, the paradigm for wetland management as expressed by central and local government agencies tends to be the opposite of active management – it tends to be one of put the fence up and leave it, albeit with the occasional pest plant operation where practicable. This is also the implicit paradigm within the NPS-FM.

11. Fish and Game Councils hold a significant number of wetland properties in freehold, as well as managing some Wildlife Management Reserves (a category of public conservation land under the Wildlife Act 1953) vested in them. Section 26S(3) of the Conservation Act treats the freehold land as public conservation land – requiring public access except in the event of a publicly notified closure for the purposes of protecting sports fish and game bird habitat.

12. Fish and Game owned and managed properties lend themselves to automatically becoming an SNA. There are currently a number of F&G administered /owned lands around NZ that are waiting on funds and resources to be developed and improved for waterfowl along with other native and indigenous species. Some of these locations are already significant and once they are mapped any further work or enhancement maybe prevented or would require a resource consent which just adds to the overall costs. Some of the properties had former significance but have been affected by the development of surrounding flood and drainage schemes.

13. The proposed NPS is primarily designed for the protection of values on private land, but in its current form the NPS risks overriding the existing system of conservation land which determines protection status

and long term management, through numerous categories of protected land (including the s26S (3) land above) as well as parent acts (Conservation Act, Reserves Act, Wildlife Act), General Policies, conservation management strategies, and plans. The Crown faces the risk of duplication, as well as conflicts between protected public conservation land with this new overlay of more comprehensive SNAs. Conflicting goals, as well as increased bureaucracy are likely, and this will hinder, or in some cases halt, restoration of ecosystems.

14. For its effective functioning, it is important to carve-out existing public conservation land, including the s26S (3) land from this imperative, because it already has a management intention and purpose. There may be other land, such as QEII, Reserves Act s77 covenants, and other forms of registered caveat on land title that also deserve the carve-out.

15. The best way to achieve this is to apply a sub clause to section 3.16 and 3.17 which would state (or use words to this effect) that “The above provisions do not apply to wetlands that are already subject to statutory management and protection schemes”, and to indicate that this includes land managed by Fish and Game Councils under s26S of the Conservation Act 1987.

15. Sources of funding to enhance and protect indigenous biodiversity along with all forms of valued biodiversity are very much lacking for the enhancement of wetlands. Nationally Fish and Game has enhanced and developed a great number of wetlands throughout New Zealand in an attempt to recreate some of the wetlands that have been lost through drainage and agricultural development.

Fish and Game’s only source of funding to achieve this work is either through licence holder funded projects or through the New Zealand Game Bird Habitat Trust. Some very large projects are very difficult to be funded due to the high costs of utilising earthmoving contractors and the Game Bird Habitat Trust doesn’t generate sufficient income annually to fund such projects.

16. Private land owners want to enhance their properties with wetlands to improve water quality and biodiversity values, look to Northland Fish and Game to assist them in their project with advice and funding. Applications are put to the New Zealand Game Bird Habitat Trust (NZGBHT) however when a development is expected to cost \$50,000 minimum and the NZGBHT is only able to contribute \$4,000 with the landowner expected to fund the balance, the projects don’t proceed.

17. To enhance, protect and encourage indigenous biodiversity and for that matter all forms of valued biodiversity on both private and public property the government needs to provide financial assistance. Regional and District Councils also need to address this matter. Funding an area to be fenced off doesn’t look after the biodiversity values. Active management and enhancement also needs to be factored into the habitat. A lack of management will only encourage the establishment of pest plants and animal pests.

18. Improving the habitat through improving water levels and letting the wetlands once again become the kidneys of the waterways will improve biodiversity and water quality. If private landowners have an SNA registered over their property titles for the protection and enhancement of biodiversity value areas the land owners should not be expected to pay any land rates over that parcel of land.

19. Thank you for the opportunity to submit.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rudi Hoetjes', with a stylized flourish at the end.

Rudi Hoetjes

Manager

Northland Fish and Game Council