

**SUBMISSION ON  
PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

To: Ministry for the Environment  
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Submitter: Integrated Foods Ltd

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Submission: **Oppose** the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.

### **Introduction**

- 1 **Integrated Foods Ltd** location, nature of business, area of land owned or under management etc.
- 2 Integrated Foods Ltd **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall Integrated Foods Ltd considers unless the document is substantially modified it will result in significant costs for limited environmental benefit, and creates real risk of exacerbating the loss of biodiversity on private land.

### **Support for indigenous biodiversity**

- 4 Integrated Foods Ltd supports the broad objective of the Proposed NPS and is very conscious of the value of biodiversity. It prides itself on being an environmentally responsible company that adopts sustainable management techniques throughout its operations.
- 5 Integrated Foods Ltd, through its parent company Mangatu Blocks Incorporation, manages Significant Mature Indigenous Forests and Protected Management Areas, is a Trustee of the Te Whero where Restoration Trust, undertakes surveys and management of Blue Duck and Weka. The Incorporation also has plans to convert large areas of farmland and riparian's to Environmental Initiatives and Ecological Corridors. Throughout this we will be Ecosourcing plant material from our own forests. We also undertake significant Pest control operations.
- 6 Notwithstanding its support for indigenous biodiversity, Integrated Foods Ltd does **not** support the Proposed NPS in its current form because it is likely to result in unnecessary additional costs without achieving any material gains in maintaining indigenous biodiversity within its lands.

### **General concern with Proposed NPS**

- 7 Integrated Foods Ltd acknowledges that the Proposed NPS contains some recognition that farmers environmental initiatives should be treated differently
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from other land uses. However these provisions are limited in scope, their meaning is unclear and their relationship with other parts of the Proposed NPS is ambiguous.

- 8 Integrated Foods Ltd is very concerned about what this means in practice. For example, its unclear how these values will be identified, and what requirements will be imposed on land owners to manage and maintain them.
- 9 With respect to other indigenous biodiversity within PFBAs, policy 3.13 and policy 3.15 require local councils to maintain indigenous biodiversity (including highly mobile fauna) by amending their plans to manage adverse effects of land use on such indigenous biodiversity. These policies could lead to new and stringent regulation of harvesting activities. Again, Integrated Foods Ltd is very concerned about what this means in practice.
- 10 When a resource consent application is triggered by indigenous biodiversity controls, policy 3.19 contains onerous requirements for assessment of potential adverse effects which would be very expensive to complete in the context of large scale land use.
- 11 Integrated Foods Ltd, as with all landowners on the East Coast, are affected by the very coarse mapping of Protected Management Areas listed in the Gisborne District Council Plans where mapping has been based on 1:25,000 Lands and Survey mapping which often includes productive lands in Protected Management Areas. We ask that the status of these areas be removed in the subsequent SNA process under the proposed NPSIB and replaced by revised SNA's.
- 12 Overall, it is reasonable to anticipate that the Proposed NPS in its current form will be relied upon to impose significant new restrictions on land owners. Such measures would impose considerable additional costs on Integrated Foods Ltd.'s operations.
- 13 Integrated Foods Ltd considers that the Proposed NPS should be substantially modified to address the above concerns and should place much more emphasis on non-regulatory measures and incentives to support positive outcomes for indigenous biodiversity within our lands.
- 14 Integrated Foods Ltd supports the broader and more detailed submission filed by the Mangatu Blocks Incorporation and the proposals for amendment to the Proposed NPS detailed in that document.

#### **Potential implications for biodiversity**

- 15 Integrated Foods Ltd considers that significant areas of its land is already beneficial for the maintenance and restoration of indigenous biodiversity. Farm operations can sometimes disturb indigenous biodiversity values. However these values typically make a full recovery quickly. Consequently, Integrated Foods Ltd considers well managed activities present little threat to biodiversity values.
- 16 In addition Integrated Foods Ltd take active steps to maintain and enhance indigenous biodiversity values in plantation forests through monitoring biodiversity, pest and predator control, and partnerships with other stakeholders.
- 17 Integrated Foods Ltd is concerned that land owners may be deterred from pursuing these voluntary initiatives if they perceive that improving biodiversity outcomes within farms will lead to more onerous regulatory control over

activities. This is not a good outcome for biodiversity, but one which is at real risk of occurring if the Proposed NPS is introduced in its current form.

### Overall costs, benefits and alternatives

- 18 Integrated Foods Ltd considers that the intended public benefits to biodiversity will not eventuate and that the Proposed NPS in its current form will not be effective at achieving its objective on land.
- 19 In contrast, Integrated Foods Ltd considers that the risks and costs of the Proposed NPS are much more significant and much more certain. These costs have been discussed above.

### Conclusion

- 20 Integrated Foods Ltd **opposes** the Proposed NPS in its current form on the basis that it will not be effective or efficient at achieving its objective of protecting biodiversity on farm land.
- 21 It will potentially generate an adverse reaction from land owners that threatens the very values that the Proposed NPS seeks to protect and will create significant and disproportionate costs for responsible landowners such as Integrated Foods Ltd that are already taking steps to actively manage biodiversity on their land.
- 22 Integrated Foods Ltd strongly supports the continued and increased use of non-regulatory methods and incentives as the most effective way to achieve the desired biodiversity objectives. Such measures can encourage and support positive actions from forest owners and ensure that the costs of such measures are equitably distributed amongst all those who benefit from the shared biodiversity values.
- 23 Integrated Foods Ltd seeks that the Proposed NPS be substantially modified to address the concerns raised above or otherwise that it be withdrawn.

Thank you for the opportunity to submit on the Proposed NPS.

Dated 11th March 2020



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Richard Heikell

On behalf of  
**Integrated Foods Ltd**