DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Submission on the publicly notified draft National Policy Statement for Indigenous Biodiversity.


To: Ministry for the Environment

Personal Information
Company name: 
Given names: 
Surname: 
Contact person: 
Address: 
Region: 
Country: New Zealand
Phone: 
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Submission

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

Background about my farm

We farm on the east and northern sides of Whangarei Heads. We run sheep and beef cattle. The property runs from just behind the mountain beach up to the ridge line on the northern end of the Mania ridge. Soil types range from marine sand, compacted peat, heavy clay, to volcanic loam. Our family has farmed here since 1950. We have a native bush gully running up the side of Mt Mania that has an SNA designation on it. Our main water supply comes from that gully.

Why am I making this submission?

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.

- 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’ on privately owned farm land 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. If local and government authorities wish to place more SNA's and restrictions on privately owned land the final decision must be up to the land owner. 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 slick approach to the recognition and ongoing management of indigenous biodiversity could, if not carefully constructed, undermine existing and future conservation efforts.

• **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. [REDACTED] on several occasions said to me he should have knocked down the native bush back in the [REDACTED] and planted it in pinetrees. Then it would be an asset not a liability. Now we have a restrictive designation on our bush with rules in place restricting what we can do on our own land. He argued that councils should issue new land titles because we no longer have a freehold title. I don't hold this hard line, but can understand where he was coming from. The further designating and placing of more restrictions on private land will alienate some land owners and have a negative effect on indiginous biodiversity.

We have had and will always have a no native planting policy on this farm. The patches of native bush that is left will be left alone as long as our family farm here. They are home to many kiwi and other native wildlife, and I hope it remains that way. After the last round of designations imposed on our native bush, I simply can't risk losing more of this farm to regulators locking it up and taking it out of our control. We rely on this land to make a living. All new plantings are exotic. If landowners still had total say over what happened on their land I would be planting natives, I prefer native to exotic. Sadly this is not the case anymore. Our bush under SNA designation is not fenced, yet. Our cows graze in the edges of the bush every winter keeping weeds down. They have been doing this for over [REDACTED] years and the kiwi still live there. Roaming Dogs are the biggest threat to kiwi in this area, not farm animals. Our bush does not have Kauri dieback as yet. It is mostly isolated from the rest of the [REDACTED] and does not have the public, DoC or Reginal council staff walking through it to spread it. The best way to protect it, is leave it as it is.
- 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 must 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.

**Conclusion**

Before targeting private land and further diminishing freehold property rights, maybe more focus should be put on DoC owned and controlled land. Years ago DoC owned and controlled over 30% of New Zealand’s land area. The DoC land we back on to and many others are infested with weeds. Volunteers carry out trapping and poisoning for pests. I spray the weeds as far as I can reach over the boundary fence to keep the fence clean at my own cost every year. There is so much land tied up in conservation all ready; that is not looked after, my do we need more? DoC land/publicly owned land could be enhanced greatly to the benefit of all, why don’t we start there.

Thank you again for the opportunity to comment on the proposed changes. If 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]

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Yours faithfully,

[Redacted]

12 March 2020