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:

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.
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
* indicates required fields

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Thank you for the opportunity to provide feedback on the propose National Policy Statement for Indigenous Biodiversity

Background
We are farming a generational family farm, my husbands family has been here for over 130 years, situated in the Tasman District. Most businesses do not carry the emotional involvement that a farm carries it is not just a business it is a life and a love.

We live in rolling hill country that has a lot of challenges but we love the land and want it to be here in another 130 years. My husband has been farming almost 50 years and the two of us for 24 years we have seen a lot of changes in that time. We are a sheep and beef farm with a stocking ratio of [redacted] per hectare, that does rise in the spring due to natural increase but once lambs are gone it drops back to that ratio.

We have [redacted] of native bush which has been untouched and would like to work with our neighbours to make a corridor of native along 4 adjoining properties. We relish and enjoy our natural flora and fauna, which we are lucky enough to have around us and treasure them. We actively trap pests that abound in the region-feral pigs, possums, rats, magpies, wasps, etc to try to mitigate the devastation they cause to our native flora and fauna. We are proactive with weeds and careful with the application of sprays. We are conscious of land disturbance in relation to water ways and continue to plant to mitigate soil and water runoff, it is an on going battle that we engage in. We are looking to further enhance our land with our environmental plans.

We deliberately understock so neither the land nor the animals are too stressed, we are looking to regenerate sections of the farm into native trees. We are a farm that does suffer dry times and do not farm with the stock in big mobs to mitigate land disturbance and keep a healthy ground cover of grass.

Our son is looking to continue on the farm and we are actively sending him out to courses to see his options for the future, he is keen to learn how to farm in such a way that he can further treasure the
land, the flora and fauna and care for the water. All the while farming to provide a wonderful product farmed in a natural way so that he can be proud of the produce that leaves his farm just as his forebears have been and done in their time on the farm. As with any business model he can’t stand still and just farm the way his grandfather or even father has, he must make his own way and needs to be able to do his work hand in hand with compliance and he is happy to as long as it doesn’t regulate him and his work into extinction.

**Why am I Submitting**

I know many older generation farmers who feel they may as well sell up and give it to someone to put trees on. These are farmers who have persued their love of the land and animals for years and want it to continue for the future generations, not fly by nighters who rape the land and then move on. It is sad and wrong, that these hard working, generous people are feeling distraught at the thought of regulatory management and see no future in one of the mainstays of our economy. When I did an Understanding Your Farming Business course through AWDT, one of the first things we learnt was that change is inevitable but great leaders make sure everyone is on board the bus before leaving the station-no one is left behind. These regulations coming from Government are unreadable by most ordinary folk which is what farmers are and they are being left behind by the language and miles of paper work.

We have wonderful farming practises: the best in the world as far as animal health, soil health, conservation, water quality, pollution reduction, because NZ farmers have had to be resourceful and forward thinking just to survive, we have wonderful products that are produced ethically and we believe in what we are doing.

Farming has been under attack for a number of years now and has been seen by Public and Government as a dirty free riders, the majority of farmers are caretakers of the land and only wish to make sure that the future of the land and farm is sustainable. We cannot raise good stock if we don’t have good soil and water. There are definitely farmers who have taken the culture out of agirculture and who do not treasure the animals and the soil, but they are not the majority.

We are not policy writers we are farmers and we don’t know how to move in the corridors of parliament but you put us on a bit of dirt in work boots and shorts and we will get stuck in to make it the best piece of soil you can find. We are emotionally invested in farming and everything connected to it, we have been having to conserve everything for years otherwise we and our farms would have fallen over. We see ourselves as Custodians or Kaitiaki.

I am submitting for the future generations that will be on the land, not just the here and now we need to walk hand in hand with what ever changes the Government implements. In the field of the land and the environment where we live, we are the experts, we may not have gone to university, but we have endured the life of a farmer through all sorts of adversities, we have learnt what is practicable and what is pie in the sky.

We are willing to work together to improve things but we are not willing to be grandparented into extinction ourselves.
General Response

We support the overall goals of the NPS for Indigenous Biodiversity.

I support the provisions that recognises that for the conservation actions to be enduring they require landowner and community support and leadership.
I support that the recognition of the values of biodiversity as part of the pastoral based landscapes and farming business is required to ensure the values of flora and fauna are sustainably managed.

el propose that 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 of the habitats and species and kaitiaki of the land.

However I oppose provisions that lock up indigenous biodiversity and in doing so penalize landowners who have nurtured their land and have created areas now deemed SNAs because of their work. I seek subtle but significant changes to the NPIS to ensure existing conservation be recognised and futre work be insentivised and supported.

Section B Impacts and Implications

I am extrememly concerned about the identification of highly mobile species in relations to the impacts this may have on my farming business and its ability to remain viable and resilient to constant farming challenges. Eg. Water supply-troughs and tanks, soil health-fertilizer: animal health-ability to make hay and balege, shelter belts, crops,etc.

I am deeply concerned about the potitential impact on my farm in relation to areas being identified as SNAs along with secondary areas being important for the protection so SNAs which may include land adjacent to SNA’s

These provisions could be interpreted as precluding the ongoing grazing of animals in all areas not just the SNAs, which could potentially make a farm extinct. A farmer who has been actively trying to do protection work may stop under these provisions as he is penalizing himself for caring about his environment.

I am very concerned about the 5 year time frame for councils to identify SNAs. I do not believ we have enough NZ technical experts to accomplish the ground truth required and to work with farmers within this time frame.

What we have done

We have a bush block behind our house, it is home to many bird species and flora athough the margins have been grazed previously and have opened the edges up to weeds we have excluded stock from this and are slowly trying to eliminate weeds from it. We are planting more natives around the farm and house so the birds have more food available t to them. We have been actively baiting for wasps. We have a trapper who targets possums and we have traps for rats, as these are problematic. We also have a hunter who comes to hunt the whole place and especially the bush and surrounding bush that exists on other properties as there is a resident herd of feral pigs which cause much devastation.We actively trap magpies and we have definitely noticed more native birds such as tui and fantails, the bell birds have started to come back as well. We have a resident and highly mobile population of kereru whose numbers have risen steadily from 10 to around 20, our neighbours and ourselves are all very aware of them and are actively looking after the native to make sure they stay around.
Hutia Te Rito-I support with amendments.

I support the objective of local authorities recognising and providing for Hutia Te Rito which recognizes the relationships between the people communities and Indigenous Biodiversity and that conservation requires Kaitiakitanga and custodianship.

I support the provisions which recognise and empower ground up landowner and community led conservation actions and prioritise non regulatory over regulation

I seek the term stewardship be changed to custodianship as it more accurately reflects the relationship and the values we impart to our future generations.

Objective 3.6

I oppose the words precautionary approach and I seek to suggest Colaborative and consultative approach as a replacement.

The reason being that we have very little information on NZ Indigenous biodiversity and we have skinks and lizards living happily and thriving in our pastures using the structures such as troughs to live and nest under, the same with native crickets.

Objective 3.7

I support the recognition that people and communities are critical to conservation actions and the protection and enhancement of indigenous biodiversity.

I seek that the NPSIB be amended so that the policies and rules reflect Objective 3.7, including the prioritising of non regulatory approaches and partnerships over regulartory frameworks.

I seek that the establishment of collaborative 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.

Objective 3.8

I support the identification of areas with significant indigenous flora and fauna by experts working with communities and in partnerships with landowners. Assessment should be done in a consistent manner with the significance of habitats verified or refined through a ground assessment rather than maps.

I oppose the broad reach of the proposed criteria as it is likely to catch all indigenous habitats irrespective of whether they are significant.

I seek changes to 3.8 so that significance criteria be narrowed to habitats or species which are endangered or threatened and identified as being present in that area. Collaborative management frameworks between all parties and can then be tailored to the level of risk that habitat faces and the attributes that underpin that habitat.

Objective 3.9

I support with ammendments.

I seek that 3.9 is amended so that effects management be based on the level of a habitats significance and is tailored to the values that underpin the habitats significance.

I seek that 3.9 is amended from new activities must avoid loss... to must mitigate and manage loss...
I seek that any offset effects should only be provided for within the same ecological area and not enable the ability of urban environment activity offsets to be put on to rural environments.

**Objective 3.12**

I support the intention of providing for existing activities but I am worried that 3.12 in it current form does not do this.

I seek 3.12 be amended to specifically provide for the following activities within and adjacent to a SNA and area identified as important for mobile species where this is an existing activity.

- Grazing of productive animals
- Pasture renewal
- Cultivation
- Vegetation clearance

I seek that 3.12 be amended to delete requirements to maintain or protect ecological integrity of a habitat where the ecological integrity of the habitat may have been impacted prior to notification of NPSIB.

We would gladly work with NZ experts as to how to go about our business in a sympathetic manner a collaborative management framework within our farm plan is have we would like to see it done, within the over arching of 3.7b, people and biodiversity.

**Objective 3.13**

I support the intention but with amendments

I oppose the locking up of area of pastoral based farming as this could impact the ability of my family farm to be viable and resilient which is contradictory to 3.7b.

I seek amendments to 3.13 to ensure existing activities as outlined in 3.12 are able to be provided for.

I seek to amend 3.13/1 to Local authorities must prioritise engagement with landowners and communities to manage indigenous biodiversity outside a SNA and be mindful of Objective 3.7b that maintaining biodiversity doesn’t preclude use and development of areas around a SNA.

I seek to amend 3.13/1 a) consider existing use and work with landowner and communites to see how and when controls...

**Objective 3.15**

I both support and oppose this clause the reason being is that it is too broad, too onerous on councils and has the potential to become a draconian measure.

I support the wanting to mitigate any loss caused by use or development, prioritising non regulatory partnerships and frameworks

I oppose any provisions that mandate this protection through regulatory frameworks.

I seek that 3.15 is amended to prioritise non regulatory partnerships. Landowner and community led approaches to managing mobile fauna within the local habitats along with NZ experts. To work with experts as they become available to co design management frameworks for farms which ensures that mobile species are provided for as an inherent and integral part of the farming business.
Summary

We have a lot of mobile fauna, native birds, native insects, native lizards, bees and bumble bees they all live along side our farming business and we are mindful of what we do and when in terms of weed eradication and pest eradication. We actively kill wasps and trap pests or invite people on to kill feral animals. I think a lot of this is care and knowledge is being missed. The fact that we have been custodians of the land and now suddenly we are being mandated to do the things we already do which seems over regulatory to me.

I along with my family support in general the intent of the NPSIB but I am wary of the setting rules without the tempering of human lives and livelihoods. Farming is an integral part of NZ’s history. We are sheep and beef farmers and have lived and breathed the care of the land for generations. We can definitely do things better and do not believe we are blameless in being complacent, but we love the land and the flora and fauna and are willing to continue to grow as Custodians/Kaitiaki of our piece of paradise hand in hand with all New Zealand. All we are asking is that we have collaborative and consultative partnerships with tailored catchment plans and bespoke farm plans which manage, mitigate and enhance indigenous biodiversity as inherent parts of our farming practices.

Blanket regulations do not take into account the diverse range of landscapes and environs and can often create consequences not intended.

Thank you for letting me submit and I am happy to speak to anyone if it is needed.