

**Submission on Government's Draft National Policy Statement for Indigenous Biodiversity  
and the He kura koiora i hokia: a discussion document on a proposed National Policy  
Statement for Indigenous Biodiversity.**

**To:** Ministry for the Environment

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**Name of Submitter:**

1. Barnscroft Dairy Ltd, Cloverdene Dairy Ltd, Dialan Dairy Ltd, Grantlea Dairy Ltd, Long Lane Farm Ltd, Pye Group Ltd, South Park Farm Ltd, South Stream Dairy Ltd, Straven Dairy Ltd, collectively known as Pye Group.

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**Signed:**

**Michelle Pye:**



*(Director of all submitting companies)*

**Background:**

Pye Group is a family owned agricultural business comprising of contracting, dairying, cropping, grazing and transport operations. Pye Group is owned by Leighton and Michelle Pye who, through different ownership structures, have farmed in Canterbury for the last 17 years. Prior to this Leighton farmed some of the same land in a family partnership for nearly 15 years and his parents before that. Pye Group is made up of different legal entities with numerous consents held by different companies with land in different catchments but all within the Canterbury region. One of the strengths of Pye Group is the scale of our operation with land owned in various parts of Canterbury which enables us to have a diversified farming operation and crop rotations that best suit location, soil types, irrigation, climate etc.

## **Position Statement:**

We understand the importance of protecting and enhancing indigenous biodiversity for future generations to enjoy, but we have concerns that the proposed policy will just increase costs for councils and landowners with no actual beneficial and practical outcomes for indigenous biodiversity.

We are proud of our current efforts to date to protect and enhance biodiversity on farm and feel that this policy will bring more compliance costs to farmers for already being good stewards of the land.

Currently, we have two Significant Natural Areas (SNA's) across two farms, as mapped by the Timaru District Council. These areas have been managed and enhanced over many years under Pye Group management. Over these years, Pye Group has paid for the cost involved with these areas such as; ongoing maintenance of fences to avoid stock access and putting weed/pest control measures in place.

We also manage farm area that is within the South and Middle Branch of the Rangitata River. We have put contingency plans in place for environmental and stock management in case of the main branch overflowing into the floodways. All of this is included in our Farm Environmental Plans so everyone on farm is aware of how these areas are to be managed.

We are concerned about the potential impacts of the proposed policy on our farm business in relation to areas being identified as SNA's and areas identified as being important for the protection of SNA's which may include land adjacent to SNA's. The policy could be interpreted as preventing the grazing of animals adjacent to and within these areas. This could mean that even though we have been protecting these SNA's we could be told that the area around them cannot be included in the current farm system therefore putting restrictions on our farming business by removing grazeable land.

We also have concerns around the cost of compliance that the will policy will impose on councils, communities and landowners. There will be a significant cost of identifying these habitats and species and then there is the costs of fencing those habitats and ongoing pest management. It is unclear where these costs will fall. There will need to a support or funding system proposed to help farmers protect and restore these areas if identified on their farm.

Lastly, we are concerned with the current number of experts in New Zealand who are able to carry out these assessments within the proposed timeframes in which councils will be required to complete mapping and have provisions within their regional plans. These assessments need to be robust and ground proofed as this keeps the process accurate and consistent. In no way do we support these assessments being completed via satellite technology.

We support an approach that is practical and without added unnecessary costs of compliance to councils, communities and landowners. We believe that the proposed policy needs to have amendments made to ensure success for everyone involved. It is important for the government to engage with all parties involved throughout the whole decision-making process to ensure mutually agreed outcomes, to build understanding and knowledge, and empower local conservation efforts as the people who manage the land will be the biggest asset to achieving this policy.

## **Section C: Specific Responses to the Proposals**

### **3.8 Identifying Significant Natural Areas:**

- Support the proposed policy with amendments.
- We understand the importance of identifying areas of significant plants and species in New Zealand. The identification process must be consistent and accurate through experts working with communities and in partnerships with landowners.
- We believe that this assessment should be undertaken in a consistent manner, with the significance of habitats verified or refined through a ground proofing assessment, rather than through the use satellite technology which can be unreliable i.e. areas of gorse may be mapped. This would then be up to the landowner to have this removed from the SNA's maps which would disrupt the whole process.
- We have concerns around the standard criteria that will be use throughout New Zealand to identify these areas as it is very broad and could be interpreted differently. We are concerned that the criteria may result in most indigenous vegetation being identified as a significant area when in fact it is not and it is impractical to have protective measures in place for this area. If large area of our farms were classified as SNA's it would have a negative financial impact on the farm business.
- With that being said, we oppose the requirements for territorial authorities to have the identification and mapping of these areas completed within 5 years and for including them in district plans within 6 years. There is not enough technical expertise available within New Zealand to be able to undertake the assessments appropriately through ground proofing, in partnership with landowners. There will also be a massive cost for councils to ensure the assessments occur within a short period increasing the already mounting pressure on councils and their staff.
- We seek that provision 3.8 is amended to enable local authorities the time to undertake this work in a robust manner therefore the timeframes need to be extended.

### **3.9 Managing Adverse Effects on SNA's**

- Support the proposed policy with amendments.
- We understand that there needs to be requirements in place to manage new activities that affect significant natural areas to ensure they are protected.
- We have concerns around what would be classed as a 'buffering zone' adjacent to identified SNA's, as it is not clear to how this would be defined. This could significantly impact current farm system management through the loss of grazable land.
- Amend 3.9 so that the policy 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 SNA'S 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 area. The ability to offset an activity in the urban environment onto the rural environment should not be permitted.

### **3.12 Existing Activities in SNA's**

- Oppose
- We seek that 3.12 be amended to provide for the following activities within and adjacent to an SNA, where this is an existing activity:
  - grazing of productive animals
  - Pasture renewal
  - Cultivation
  - Vegetation clearance
- We 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 features of that SNA, such as representativeness, rarity, and distinctiveness.

### **3.13 General rules applying outside SNA's**

- We understand the intention of recognising areas around SNA's as an important factor for protecting SNA's and their values.
- We seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for.
- We are concerned that 3.13 as proposed may result in farm areas around SNA's being removed from the current grazing system. This could result in significant areas of farms being impacted which ultimately would impact the farms practical and financial position.
- We 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 features that make a SNA significant.
- We seek that clause (2) is deleted.
- We seek that 3.13 is amended to prioritise engagement with the technical expert and landowner to create management frameworks for the farm which ensures that indigenous biodiversity is provided for as a part of the farming business. This could be achieved through Farm Environment Plans that manage biodiversity values and the farming business.