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OF NEW ZEALAND



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# SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY AND RELATED DOCUMENTS

**TO:** MINISTRY FOR THE ENVIRONMENT  
[indigenusbiodiversity@mfe.govt.nz](mailto:indigenusbiodiversity@mfe.govt.nz)

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## CONTACT DETAILS:

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## 1. INTRODUCTION

- 1.1. The Southland Branch of Federated Farmers of New Zealand Inc. (Southland Federated Farmers) welcomes the opportunity to provide feedback to the Ministry for the Environment on the proposed National Policy Statement for Indigenous Biodiversity
- 1.2. Southland farmers value biodiversity and are committed to their role as stewards of large portions of New Zealand's natural assets. Farmers have demonstrated this through investment in environmental spending and mitigation, and development of farm and catchment focused solutions. However, our members are deeply concerned that the NPS as it stands will impose significant cost burden, while undermining the good will of the rural community and creating a barrier to continued proactive stewardship.
- 1.3. Southland Federated Farmers acknowledges and fully supports the submission of the Federated Farmers of New Zealand. Our submission is to be read in conjunction with that broader submission and has focused on the key concerns that will disproportionately impact Southland communities.

## 2. UNINTENDED PERVERSE CONSEQUENCES

- 2.1. We are deeply concerned that farmers who have proactively protected areas of biodiversity without any regulatory requirement to do so, will be penalised under this

proposal. Many farmers take their role as stewards of the land very seriously, but this policy essentially turns areas of biodiversity into a liability by restricting options for ongoing land use and potentially imposing costly requirements such as fencing and pest management.

- 2.2. The protection of biodiversity on private land relies on farmers proactively undertaking pest control activities, but if good will and profitability is undermined by regulation restricting their ability to farm productively, they may not have the financial resources to undertake these crucial activities and they almost certainly won't have the intrinsic desire to be proactive in this way. It will also likely disincentivise any future restoration and enhancement, if it is known that further restrictions and negative impacts will likely result from those positive actions.

### **3. DISPROPORTIONATE IMPACT ON SOUTHLAND**

- 3.1. Southland Federated Farmers supports the points made by the Southland District Council regarding the disproportionate impact on Southland and Southland's ratepayers from this proposal. Due to Southland District's comparatively large land area and low rate payer base, the cost burden on Southland ratepayers from this proposal will be excessive, and unreasonable.
- 3.2. As this work is for the greater benefit of New Zealand as a whole, this burden should be shared more fairly and/or reconsidered to allow it to progress at a pace which is manageable and affordable in the context of the other wide ranging costs being imposed through central Government regulation.
- 3.3. A large area (60%) of Southland District is managed by the Department of Conservation. The costs to assess and manage biodiversity on this land should be funded by the Crown, not by the Southland District and its ratepayers.

### **4. CONSIDERATION OF IMPACT ALONGSIDE OTHER PENDING REGULATORY IMPACTS**

- 4.1. Southland Federated Farmers supports the points made by Southland District Council and Environment Southland that request consideration be given to the complete suite of national policy instruments which are under review currently to ensure that they are consistent with each other and that the totality of cost implications is analysed and considered.
- 4.2. Southland District Council's submission highlights that it will be unable to meet the requirements of the draft Indigenous Biodiversity NPS in the timeframes proposed. When the requirements of the Essential Freshwater package are then laid on top of this, the resourcing expectations and cost impacts to the Southland region and the national economy are simply too much to bear in the timeframes expected.
- 4.3. It is our view, that an extension to the timeframes for giving effect to the NPS will be needed for the Southland region, both as a result of Southland's unique geographic circumstances, and the fact most territorial authorities have within the past five years completed substantial reviews and updating of their District Plans.

## 5. CONCLUSION

5.1. Southland Federated Farmers thanks the Ministry for the Environment for the opportunity to provide feedback on its draft National Policy Statement for Indigenous Biodiversity. We look forward to ongoing dialogue about the proposal.

