

DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

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

On: Ministry for the Environment – draft National Policy Statement for Indigenous Biodiversity.

To: Ministry for the Environment

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

BACKGROUND

In 1965 we purchased [REDACTED] Ha of scrub and heavily cut over indigenous vegetation with the intention of developing a productive sheep and beef farming unit.

Among the derelict trash following 60 years of successive logging, were areas interspersed with ecological values, including water catchments, wahi tapu sites, groves of juvenile podocarp species and areas reflecting an extensive variety of indigenous biodiversity that were worthy of protection.

In 1972, Federated Farmers worked to established QEII National Trust which provided a mechanism for farmers to protect in perpetuity, areas of significant biodiversity on their properties. Our property now consists of [REDACTED] ha QEII Covenant, [REDACTED] ha grazing pasture.

These protection areas were selected based on protecting

- water quality
- wahi tapu site
- significant biodiversity in regenerating forest
- a wetland area
- an area to provide outdoor education for primary, intermediate and secondary school students to have an opportunity to connect and understand the environment

In the 1970's local farmers, including myself, spearheaded a campaign to prevent the government converting substantial cutover remnant forests into pine trees. The Kaimai Mamaku Conservation Park is testament to the work and values that these farmers fought for. Farmers for years have been proactive in recognising and protecting environmental values and we should be celebrating the fact that 24% of NZ total indigenous habitats occur on areas covered by sheep and beef farms and that this represents 2.7 million ha of indigenous habitat.

As with other sheep and beef farmers, we take responsibility for the health of our indigenous protected areas. This involves

- ongoing weed control
- ongoing fencing maintenance of 9 wire and battened fences
- ongoing possum, rat and stoat control
- allowing hunters access to manage pig and deer incursions
- clearing trees that have fallen through fences around protected areas

GENERAL RESPONSE TO THE PROPOSALS

Maori and private landowners have already protected significant areas of indigenous biodiversity and endeavour to maintain these areas from pest and weed infestations

Maori and private land owners, over the past 50 years in particular, have invested significantly to protect areas of unique and indigenous biodiversity on their properties. QEII National Trust Covenants, Nga Whenua Rahui, Regional Council catchment plans and farm environment plans along with local government incentives for long term environmental protection, have led to over 1.2 million ha being protected in this way. These landowners accept an ongoing investment in fencing maintenance, weed control and undertake their own pest control programmes.

On our farm alone we have annual visits from three different agencies associated with the protection of our land. Co operation and co ordination of information between agencies would be helpful. Much of the information being sought already exists.

Government (Department of Conservation - DoC) cannot look after their own lands of indigenous biodiversity

The government, through the Department of Conservation(DoC) do not effectively manage the 8 million ha of land under their administration. The biodiversity decline throughout these land parcels makes for sorry reading. DoC rely heavily on volunteers, philanthropists and the goodwill of the NZ public to assist in their biodiversity protection and still cannot stem the sliding decline of our countries indigenous biodiversity.

The hypocrisy is that the government wants to regulate farmers who have recognised the indigenous value and proactively protected areas on their property and who continue to maintain the health of these protected areas at their own cost.

The focus should really be on the 30% of protected indigenous biodiversity land, managed on behalf of the government by DoC, to stem the flow of further biodiversity decline and retrieve the health of these environments .

Don't legislate the landowner - work WITH the landowner

Farmers are willing to work with those who have statutory duties in managing outcomes. The QEII National Trust has demonstrated how progress can be achieved through the voluntary approach. Farmers have subscribed to be involved. We need to identify and prioritise practical ways forward, not be loaded with rules that ignore dealing with the issue and that impact those that are not the immediate problem.

Farmers are already working with QEII National Trust, Nga Whenua Rahui, Regional Councils and Local Councils. We need to build on the trust and relationships already formed, not start new relationships.

Farmers are already the BUFFER ZONE

Adding buffer zones adjacent to existing protected indigenous areas, or demanding less intensive farming, is a cheap form of depriving many land owners a right to farm their land profitably. Government should not be legislating for a 'one size fits all', blanket approach to a perceived risk.

Land owners play a critical role in maintaining and enhancing biodiversity. Their contribution as custodians of these protected habitats needs to be acknowledged and respected, not legislated against.

The perceived BUFFER ZONE threat to existing Significant Natural Areas (SNA) is more realistically urbanisation and tourism in our area of the Bay of Plenty, not farming operations.

Give indigenous biodiversity protection the carbon credit status that it deserves

Landowners that protected indigenous areas prior to 1990 have already contributed significantly to New Zealand's greenhouse gas emission benchmarked at this time. These protected areas in some cases were regenerating indigenous forest remnant, from last century timber extraction operations. Fifty years on from their initial protection, these are now significant indigenous forest areas. However, the government, (not the landowner who initiated the protection), that has utilised the benefit of these areas for the wider NZ public in establishing our 1990 greenhouse gas emissions statistics.

It needs to be recognised by government and agencies, the inherent value that 2.7 million ha of land protected on NZ sheep and beef farms contribute to our country.

SUMMARY

1. I request changes to the policy to ensure indigenous biodiversity can be integrated within pastoral land uses and activities and recognise these can co exist for mutual benefit.
2. I strongly oppose a mandatory approach that penalises landowners who have been proactive in protecting indigenous biodiversity.
3. Co operation and co ordination between existing agencies (Councils, QEII) and landowners will achieve most constructive outcomes. A regulatory approach will only undermine existing and future conservation efforts of farmers and negate what is already and continues to be achieved. One size doesn't fit all.
4. Existing conservation efforts need to be rewarded and ongoing conservation supported and incentivised.

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

Yours faithfully,



12 March 2020