

**INDIVIDUAL SUBMISSION  
ON PROPOSED NATIONAL POLICY STATEMENT  
FOR INDIGENOUS BIODIVERSITY**

**TO: MINISTRY FOR THE ENVIRONMENT**  
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**Submitter's Name and Contact Details**

Name	Phone Number	Address
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]

## Introduction

My family and I farm at Big Hill Station, adjacent to the Ruahine Forest Park and the Ngaruroro River. The property is [REDACTED] hectares. The topography and the soil types vary considerably throughout the property.

I have farmed this property since 1987 and have grown our farming enterprise by acquiring other properties in the Hawke's Bay area. We farm sheep and cattle, breeding and fattening the progeny for export meat markets.

On Big Hill Station we are currently considering other land use options; biomass, fuel (firewood), forestry, deer, recreation and accommodation.

We have fenced off from regular grazing approximately [REDACTED] hectares of mainly Kanuka but also smaller areas of other native Flora within that [REDACTED] hectares. We are proud of the areas of greater biodiversity within the fenced off areas that include regenerating podocarps, Native Broad Leaf and Ferns. We have witnessed a recovery in the regeneration of these areas with the opossum control initiatives of the last 25 years, and enjoy the increased numbers of native birds. We are proud of the fact we farm in a water catchment that is described as pristine.

It is our intention to harvest some areas of Kanuka for firewood and we also intend to limit any further encroachment of young Kanuka and gorse that is impacting our commercial use of land currently in pasture.

We also intend to investigate recreation and accommodation opportunities that these beautiful and peaceful areas may offer those seeking quiet isolation. This accommodation and recreation may be in the form of a private dwelling for personal temporary use for our family and friends or may evolve into a more commercial application.

We do not see how the clearing of a relatively small area associated with dwellings and access within our own areas of land covered in indigenous species can have a significant or even discernible effect on anybody else.

We do not see the difference between harvesting a native species such as Kanuka to that of exotic species - both are legitimate land uses.

By not developing this [REDACTED] hectares of land into other uses we have foregone commercial opportunities and importantly we have invested time as well as our land into these areas so that these areas are now the value they are today - whether that value be associated with harvesting of biomass, fuel or for the aesthetics and biodiversity it now provides. I believe this value belongs to us as the owners who have nurtured it and we have earned the right to manage it as we see fit.

We do not intend to impede the enhancement of the areas of greatest biodiversity on our property. Due to considerable foresight we have areas of greater biodiversity than some who now strongly advocate for protection of anything that even hints at indigenous origin today.

The broad descriptions included in the draft documents of the NPSIB create uncertainty for landowners. The documents could be interpreted in a way that means any area with native plants could be eligible for consideration and at any future date, and this detracts from the landowner's ability to pursue with confidence their right to enjoy their property without undue interruption.

Self-seeded native plants that grow where they are not wanted by the landowner are weeds like any other plant from any other origin. I do not believe the fact they originate in New Zealand alters that or somehow makes them sacred or significant.

I am very concerned that imposing rules and regulations upon landowners that reflects only the wishes of others and not those of the landowner seriously erodes private property rights.

I believe it is the effects of land use on others that is the required focus of Regional and District Authorities. If there is no detrimental effect from a land use or activity, on what basis can anybody else including a statutory authority object to or dictate how much a landowner should contribute to what someone else or an authority desires from that landowner's land?

It is not the role of private landowners to effect the wishes of others in the community who have no stakeholding in privately held land.

If others want a greater say on individual private titles they should seek financial investment to match their emotional investment.

If any individual, group, statutory authority or the crown does not believe there is enough land dedicated to Indigenous Biodiversity than they/it should acquire land for the purpose.

It is an expensive mechanism, but it does provide focus and puts into monetary terms the cost and contribution expected by private property owners when a statutory authority dictates by decree how private land is to be utilised.

The biodiversity that exists on one person's private land through hard work and/or decisions taken by that person (or their predecessors) does not belong to the nation any more than a privately built town dwelling could. It belongs to the landowner and exists due to that landowner's desire for it to exist.

International precedents exist where landowners are incentivised and rewarded for maintaining a nation's wishes in regard to biodiversity. The cost of achieving these initiatives are shared by a much wider community, not just demanded of a politically expedient few, and fairly reflects past initiatives of those individual landowners that have carried the SNA baton to this point.

This NPSIB Regulation and Policy approach can be likened to a school yard bully grabbing whoever's lunch he wants just because he can, while saving himself the money he would have otherwise spent buying his own.

I believe the Proposed National Policy Statement for Indigenous Biodiversity as it applies to private landowners does not stand up to arguably the most important of Kiwi criteria – it is simply not a fair go.

I oppose Hutia Te Rito being applied to private property and consider that an individual's right to express their own choices, initiative and approaches to managing their land without ill effect to others is also valuable.

I oppose Tangata Whenua being involved with implementing this National Policy Statement where it may apply to private property.

It is my experience that biodiversity of both Flora and Fauna has flourished with greater pest and predator control, and there is sufficient area for Indigenous Biodiversity species to flourish given greater funding and better management within existing Crown Land.

This Draft NPSIB is too far reaching beyond identifying existing SNAs and has developed into an attempt to control the use of private property without due cause or compensation. It should either be dismissed in its entirety or retreat back to identifying truly Significant Natural Areas and working with the landowners on ways to enhance those areas.

**Specific amendments sought:**

I request that:

- a) The draft NPS, including sections 2.2 Policy 10 and 3.12(4), is amended to provide landowners an unfettered right to clear incursions of indigenous vegetation from areas of productive pasture, regardless of the composition or species type of that pasture or indigenous vegetation;
- b) The draft NPS, including sections 2.2 Policy 10 and 3.12(4), is amended to enable landowners, by way of a permitted activity or at worst a controlled activity, to clear areas of indigenous vegetation (regardless of the composition or species type of that indigenous vegetation) from land that has been retired by them or their forebears in the past and allowed to regenerate, where such clearance is required to facilitate the landowner's accommodation or recreational activities;
- c) The draft NPS, including sections 2.2 Policy 10 and 3.12(4), is amended to enable landowners to harvest kanuka and manuka for firewood from land that has been retired by them or their forebears in the past and allowed to regenerate;
- d) A new Objective is included in Section 2.1 of the draft NPS to facilitate the above amendments. Wording of the following or similar nature is sought:

*Objective 7: to enable landowners to freely clear or harvest areas of indigenous biodiversity that exist solely as a result of land retirement actions of the current or past landowner(s).*
- e) The draft NPS, including sections 2.2 Policy 6 and 3.8, is amended to ensure that if areas of land containing indigenous vegetation that have been voluntarily retired by the landowner or their forebears in the past is to be declared a SNA then the landowner is fairly compensated for what will be the effective loss of control of that land; and
- f) Any consequential amendments to draft NPS sections 3.7, 3.9 and 3.13 arising from the above specific requests.