

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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My wife and I farm a [REDACTED]-hectare property in the Upper Motueka catchment. Prior to our purchase the farm had been part of a much larger extensively run grazing property that had very little development. The farm consists of old river terrace and a mix of moderate and steep hill. We farm beef, of which the stock consists of [REDACTED] nurse cows, calves, as well as rising two-year-old heifers (some will become nurse cows) and rising two-year-old bulls for finishing. Some calves will be sold as calves, some will be sold as yearlings and some will be taken through to finish. At present there are [REDACTED] stock units. The stocking rate is variable.

We have approximately [REDACTED] hectares of Pinus radiata plantation of which most has been harvested. Approximately [REDACTED] hectares is waiting to be harvested. All [REDACTED] hectares will be replanted.

Since purchasing our farm gullies and waterways have been wired off, some four kilometres of permanent fencing has been installed, a very basic stock water system was installed. We are presently installing an extensive stock water system with reticulated water to each paddock. Soil fertility, which was low when we purchased the property, has been increased to optimum or near optimum levels for pasture growth. Weed control has been undertaken.

To improve the efficiency of the farm approximately another [REDACTED] kilometres of permanent fencing will need to be installed and the old low producing Browntop and Sweet Vernal pastures will need to be replaced with higher producing pasture species. Once we have the permanent fencing to a suitable point, goats will be introduced as a stock class to aid in weed control and improving pasture quality.

On purchasing the property, we wired of riparian strips as well as gullies to exclude stock from waterways. We have planted a mix of native and exotic plant species for aesthetics and soil conservation. In one gully there is a small area of approximately [REDACTED] hectares of remnant native

flora consisting of mature beech, some young kahikatea and rimu and undergrowth. Since purchasing the property we have trapped for opossums and stoats and rats and baited for mice and rats in the indigenous bush as well as in the pine plantation. Our aim is to be in the top 10% of farmers, for this class of land, with a farm that is financially viable, aesthetically pleasing and environmentally sustainable.

Making this submission is important to us because for this farm to be economically viable my wife and I need to be able to farm the effective area to its land use capability. At the same time, we are working toward enhancing our natural environment through wiring of streams and gullies and the patch of native vegetation because we care. We have been planting trees and trapping pests without government input. This farm is our home, our business and is tied closely to our wellbeing. financially and spiritually. We view native species of plants present, and the bird life that they attract, to be assets.

This proposed National Policy Statement for Indigenous Biodiversity (NPSIB) has the potential to cost us financially through lowered efficiency of land use, through increases in compliance costs and in the council rates that we pay, as well as the possibility of the costs involved in applying for resource consents. This policy will turn having indigenous flora on the property from an asset into a liability. It will discourage us from planting more native species and it will discourage us from continuing to trap and bait for pests. Trapping and baiting costs time and money. If we are to enhance our farm's natural environment the farm needs to be financially viable. Because we have a small effective area this policy will make our farm financially unviable. Which will have a negative flow on effect to the contractors that we employ and the businesses from which we purchase goods and services.

When we purchased the property, there was no bird life present in the remnant of native bush present on the farm. There were very few non-native birds on the property. Once we started trapping and baiting for pests fantails appeared in the native as well as in the pines. Because of our planting of native species tui visit the property. About 2011 there was a 1080 drop behind our property and amongst our *Pinus radiata*. Twelve to 18 months later we counted five pairs of weka on the property. Kereru started passing through due to a now available food supply. Presently there is now one weka and we have not seen chicks for about two years.

We support the overall goal of the proposals that recognize the value of indigenous biodiversity to New Zealand, its people and communities. Concentrating on pest management or eradication would be a more effective means of increasing indigenous biodiversity than regulating to

increase the size of the area of indigenous flora, and reducing or destroying the financial viability of farms.

New Zealand farmers have retained 2.7 million hectares of indigenous habitat within their farms which is testament to the value farmers place on indigenous biodiversity. A total of 24 % of New Zealand's total indigenous habitats occurs on the 8.8 million hectares covered by sheep and beef farms, with over 47% of QEII covenants being on sheep and beef farms. The area of indigenous habitats formally protected by the QEII, Nga Whenua Rahui, and other covenants is growing.

We support provisions which recognize that people are critical to maintaining and enhancing biodiversity, as well as acknowledge the importance of respecting and fostering the contribution of landowners as custodians and Kaitiaki to these habitats and species.

However, we oppose provisions which seek to 'lock up indigenous biodiversity' and in so doing penalise us as landowners who have worked to protect indigenous biodiversity. We seek changes to the policy to ensure that indigenous biodiversity can be integrated within pastoral based land uses and activities, and which recognize these can co-exist for mutual benefit.

Indigenous biodiversity should be considered as an asset to our farming business, and community, and not as a liability. Subtle but significant changes to the NPSIB are required to ensure that existing conservation efforts are rewarded, and ongoing conservation is supported and incentivised. The recognition of the values of indigenous biodiversity as part of pastoral based landscapes and farming businesses is required to ensure that these values, habitats and species are sustainably managed. A strong regulatory or stick approach to the recognition and ongoing management of indigenous biodiversity could, if not carefully constructed, undermine existing and future conservation efforts.

We have a small area of remnant native bush covering an area of approximately 2 hectares in a gully. On either side of the gully, along the top edge, is pasture for grazing. Livestock do not have access to this native bush because it has been wired off. The gully above and below the native bush has also been wired of and is also closed to stock. The native bush is an island that is aesthetically pleasing for us and the community and which provides food and shelter for indigenous birds.

We are deeply concerned about the potential impacts of these proposals on our farm in relation to areas being identified as Significant Natural Areas (SNAs), areas identified as being important for the protection of SNAs and the identification of highly mobile species, in relation to the impacts this may have on our farming business and its resilience and viability. The provisions could be interpreted as precluding the ongoing grazing of animals adjacent to and within these areas

which means that we, having worked to protect indigenous habitat and species within our farming business, could shoulder very significant costs including restrictions on our farm business.

If livestock are to be precluded from grazing areas adjacent to the native bush the ensuing long grass and woody weeds become a fire hazard. As well, we will not be able to use the effective grazing land to its land use capacity, thus reducing the farms financial viability and resilience through dry summers.

If livestock are precluded from grazing such areas, and we are restricted in carrying out weed control then gorse, broom, blackberry and hawthorn will encroach on those areas 'locked up'. Native species do not compete well with such weeds. We consider it unlikely that precluding livestock from grazing pasture adjacent to the native bush will allow the indigenous plant species to spread. Grass and weeds will out compete the native flora. 'Locking up areas' to preserve indigenous biodiversity will be financially costly to our farm business and an ineffective means of preserving native biodiversity.

The compliance costs of the various proposals are likely to be significant. There will be the cost of identifying native habitats, the cost of permanent fencing when at present wiring of the native bush is effective, and the cost of ongoing pest management. At present we do the pest management because we care, this is our home, and because my wife and I see the native bush as an asset. We would like to continue to care about looking after the indigenous flora and fauna, as well as continue to view the native bush as an asset.

As currently proposed, it is unclear where these costs fall. Financial technical and human resourcing support should be provided to assist landowners to continue to protect and restore indigenous habitats and populations within their farming businesses and communities. Support should be provided to not only areas where indigenous biodiversity is being restored, but also to where it currently exists.

At present the most significant barriers to further encouraging biodiversity on our farm is the time spent checking traps and bait stations, as well as the cost of traps and the cost of planting. The cost of planting is expensive. Our experience of planting native flora is that the area should be sprayed off to kill the weeds for at least 2 seasons. Over an area of say 1 hectare a helicopter would be the most cost- effective option. At approximately [REDACTED] - for 2 sprays. Plants to be spaced at 1.5 x 1.5 m, which is the advice we received from Titoki Nursery, Brightwater. This spacing provides the fastest canopy cover at 3 to 5 years. Costs of plants would be approximately [REDACTED] -. Planting is labour intensive. Our experience is that it would take us 1.5 months to plant that [REDACTED] hectare at [REDACTED]

per hour and two people. Planting labour would cost [REDACTED]. The cost of plant guards would be approximately [REDACTED]-. There is cost in time during the following [REDACTED] to [REDACTED] years in spot spraying for weeds so that the native flora is not out competed. Say [REDACTED] per year for [REDACTED] years at [REDACTED]- per hour plus spray would be approximately [REDACTED]-. Total cost would approximately be [REDACTED]- per hectare

We are concerned that New Zealand does not currently have the extent of technical expertise available to assist regional and district councils to identify SNAs and mobile species across their territorial areas within the next five years, and to ground truth this work, that the provisions of this proposed NPSIB will require. It also appears to us that this proposed NPSIB will place councils in an adversarial role rather than working with farmers and landowners.

When we purchased this property some of the most helpful planting advice came from the Tasman District Council (TDC). If the council is forced into an adversarial approach, relationships will sour. We think that better outcomes stem from good relationships.

The requirements on regional and district councils including time frames should ensure that the identification of these habitats and species is robust and is undertaken in a way which engages land owners and communities, builds understanding and knowledge, which empowers local conservation efforts and is not a cause for our rates payable to TDC to increase. Nor should we have to pay compliance costs for something that is intended to be for the national good. Increased rates bills and compliance costs remove finances that would otherwise be available for increasing the efficiency our farm and positioning it financially so that we can continue to improve the biodiversity on our property through increased pest trapping.

Two of our aims, when we purchased this property, were that the property be more aesthetically pleasing and environmentally friendly when we come to leave the property. To date we are able to say that we have achieved both aims. However, we consider ourselves to be custodians of this property and realize that we can continue to make environmental and aesthetic improvements to this property. In this endeavour it is important that we be allowed flexibility and incentivised, but not forced, to take care of the biodiversity on this property.

Government initiatives to encourage us to further undertake 'custodianship' actions would be to subsidize traps and make the stoat traps that DoC use easily available for purchase. Cat traps would be another useful tool to have available. Further incentives would be to allow us to include that portion of indigenous bush and our other planting as offsets in climate change mitigation for our farm. Another incentive would be to provide resourcing assistance.

At present this NPSIB has the potential to constrain us to the past and remove our flexibility to produce a product of value. However, there is potential in this policy to connect with consumers and add value by underpinning Country of Origin branding and markets. Providing we are allowed the flexibility for our farm to be financially viable.

The specific provisions of the proposal that our submission relates to and the decisions it seeks are as detailed below.

Hutia Te Rito

Our submission is that:

- We support with amendments.
- We support provisions which recognize and empower ground up, landowner, and community led conservation actions, and which prioritise non-regulatory over regulation management frameworks.

The decision we would like MfE and DoC to make is:

- We seek that the term “stewardship” is replaced with “custodianship” which more correctly reflects the values we place on indigenous biodiversity within our farm and our relationship and ties to our land.

3.6 Precautionary Approach

Our submission is that:

- We oppose this approach. This approach means that TDC will say no to consents even though the activity may actually be an existing activity. This will reduce our flexibility and there will be an opportunity cost as well as financial cost.
- The indigenous biodiversity will be present because of the way that we already manage it, not because it has been ‘locked up.’ If the existing activity maintains or aids the biodiversity to increase there is no need for this provision or TDC to take this approach.

The decision we would like MfE and DoC to make is:

- We seek to have this provision deleted.

3.7 Social, economic and cultural wellbeing.

At present we are entering autumn and considering fertilizer needs. We did soil tests in the spring and the results of these we will use in conjunction with the stocking rate so that we do not

over fertilize. The fertilizer will be applied to the growing pasture that occurs during the autumn flush. Connected with this, we weaned the calves in late January so that the cows do not lose condition eating rough pasture while feeding calves. Instead the cows are cleaning up the rough pasture, and at least maintaining their body condition during a time when there are few metabolic claims, so that when in the autumn flush occurs fresh pasture grows. Otherwise the risk is that pastures thin out due to smothering by old uneaten pasture. That would cause feed problems through the winter. Our aim is that by May 1st, the cows have regained body condition and they graze through the winter on maintenance rations but be in good condition for calving in the spring. It means that the cows will have few calving problems, the new calves get a good start because mum can feed them well and our financial costs are significantly less because we will not need to feed-out a lot of baleage. As well, trying to put condition on the cows by feeding baleage, to get them ready for calving, through the winter is expensive. Also, at present because we have not yet got stock-water to all paddocks, we have to think about the order in which we use the paddocks, access to the paddocks and how we juggle three different groups of livestock in order to look after the well-being of each class of livestock.

Our point is that we have to consider the farm as a whole, to make the farm work well we have to understand how one decision impacts on the rest of our farm system. We cannot make a decision thinking that one aspect operates in isolation from every other aspect of the farm. We support Provision 3.7 but Provision 3.7 is an island in this policy, it is in isolation. This provision does not extend through the rest of this NPSIB, which is otherwise about exclusion.

This proposed NPSIB is being put forward in isolation. It pays very little heed to the welfare of us as landowners, and the welfare of the community. This proposed NPSIB does not recognize the environmental work we have carried out. Instead it penalizes us for being proactive and looking after indigenous flora and fauna.

This proposed NPSIB removes our flexibility to be able to have a financially viable farm. There are three classes of SNA's in this document and each class encroaches on our ability, without actually doing anything to increase the biodiversity on our farm, to farm flexibly and profitably.

This impacts the local community. It reduces our ability to purchase goods and services from the local community. It will reduce the ability of other landowners to economically support the local community whether through providing jobs or through purchasing goods and services. The effect is cumulative. When people move out of a community clubs fade away, schools close, services finish because there is not the population to support the cultural life of the community. For three years my

wife volunteered on the Tapawera Show committee. When there are not sufficient people to work on such committees, local cultural events cease to exist.

We have excluded stock from streams and gullies, so that the water flowing from our property is in better condition than when we purchased the property. There is more indigenous biodiversity on our farm because we have planted indigenous and exotic plants. The community downstream benefits from the improved water flowing into the Motueka River. The local community benefits simply through us improving the aesthetics of this valley.

Our farm contributes to New Zealand's export earnings. We contribute to jobs both locally e.g. the truck drivers taking our livestock to the sale yards or to Wellington. Our farm contributes economically to jobs in Wellington when we send livestock to Grace Brothers. This involves the processing facilities as well as the distribution network. At the same time, we have increased the biodiversity on our property because to date we have had the flexibility to work toward farming our property to the land use capability. We are taking a holistic approach, realizing that farming and biodiversity can coexist.

The proposed NPSIB is not approaching the question of biodiversity holistically. For biodiversity to be considered in a holistic manner the economic, social and cultural well-being of people needs to be taken into account. This includes the governments' overall approach to farming and the ensuing effects on rural communities. If rural communities and small towns disappear, social problems in larger urban centres will increase.

Provision 3.7 should be reflected in the rest of the NPSIB. There should be reciprocal relationships allowing social, cultural and economic wellbeing while looking after the indigenous biodiversity.

Our submission is that:

- We support objective 3.7. We seek that objective 3.7 is retained as notified.
- We support the recognition that people and communities are critical to conservation actions and the protection and enhancement of indigenous biodiversity.
- We support provisions which empower and support landowner and community conservation activities and local approaches.
- We support the recognition that the maintenance of indigenous biodiversity can occur in coexistence with providing for use and development.

The decision we would like MfE and DoC to make is:

- We seek that the NPSIB be amended so that policies and rules reflect objective 3.7 including prioritising non-regulatory approaches and partnerships over regulatory frameworks, and the establishment of conservation frameworks which recognize 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.

3.8 Identifying Significant Natural Areas

We have a remnant, isolated (non-contiguous) patch of beech forest of approximately 2 ha in area in a gully. When we purchased the property, we wired of the patch of native so that livestock could not enter.

At present this small area of native gives us pleasure and we view it as an asset to our home. If the present provisions are continued with and this non-contiguous beech remnant is classified as an SNA it will become a liability. It will reduce our flexibility for grazing livestock as a part of the normal rotation on adjacent areas of pasture. We consider that the native will affect negatively the value of our property and will have nuisance value and take away any pleasure we might have viewing it. An electric wire works effectively at excluding livestock. Permanent fencing will be an expense and could be a significant expense if the area is to be ringfenced in a difficult gully. This would divert financial resources from more effectual environmental safeguards elsewhere on the farm. At the same time classifying this small area of beech forest as an SNA would reduce farm income because of the effect on adjacent areas of pasture that would occur under the present provisions.

This provision does not allow for ecological district. It is a very broad provision requiring only one tick in one category. Because the provision is very broad the risk is that all of the identifying will be carried out by a person sitting at a desktop and will identify anything that is green as an SNA. Further the risk is that because a terrestrial ecologist is expensive, the ground truthing will not happen which will have dire economic, social and cultural consequences for landowners and small communities.

Our submission is that:

- We support with amendments.
- We support the identification of areas with significant indigenous plants and or species, by experts working with communities and in partnerships with landowners. This assessment should be undertaken in a consistent manner, with the significance of habitats verified or refined through on the ground assessment, rather than just through reliance on spatial maps.

- We oppose the requirements on local authorities that the assessments have to be completed within 5 years. This is because it is unlikely that the technical expertise is available within New Zealand to be able to undertake the assessments appropriately including through on the ground verification of the significance of habitats, in partnership with landowners.
- While we support the establishment of a consistent approach to determining whether or not a habitat is significant, we oppose the broad reach of the currently proposed criteria as it is likely to capture all remaining indigenous habitats irrespective of whether they are significant i.e. they are rare, threatened, or at risk.

The decision we would like MfE and DoC to make is:

- We seek that provision 3.8 is amended to enable local authorities the time to undertake this work in a robust manner. The ability for experts to work with landowners in identifying these habitats and informing the ongoing management of these habitats within pastoral based land uses and activities, is an essential element to providing successful and enduring conservation outcomes.
- We seek changes to provision 3.8 so that the significance criteria are amended so that habitats which are “rare” are identified, “at risk” are identified, or “threatened” are identified. Management frameworks can then be tailored to the level of risk that the habitat faces and the attributes that underpin the habitats significance.
- Amend provision 3.8 so that a habitat that is identified as “threatened” is only included if it is 0.25 ha or greater and contiguous.
- Amend provision 3.8 so that a habitat that is identified as “rare” is only included if it is 0.5ha or greater and contiguous.
- Amend provision 3.8 so that a habitat that is identified as “at risk” is only included if it is 1ha or greater and contiguous.
- Exceptions can be provided for but should be specified in the regional or district plan.
- We seek any consequential amendments to ensure provisions are aligned in identifying and then establishing management frameworks specific to the risk status of the habitat e.g. “rare”, “threatened”, or “at risk”.

3.9 Managing adverse effects on SNAs

This provision is to do with the exclusion of livestock and us.

Our submission is that:

- We oppose the current proposal but put forward changes.
- This provision is about avoiding which will mean do not do it.
- This provision does not consider Provision 3.7 (b) which means uses can coexist.

The decision we would like MfE and DoC to make is:

- We seek that 3.9 is amended so that the effects management hierarchy is based on the level of the habitats significance e.g. whether it is “rare”, “threatened”, or “at risk”, and is tailored to the attributes which underpin the habitats significance.
- Amend 3.9 so that the term ‘avoid’ is changed to ‘mitigate’.
- Amend 3.9 so that the provision relates to consent applications and the assessment of effects, and requirements to manage, remedy, or mitigate the effects. New activities should be provided for where the effects of the activity on the attributes that underpin the habitats significance (such as representativeness, rarity, and distinctiveness) can be managed, 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 enabled.

3.12 Existing activities in SNAs

Since purchasing this property we have been grazing productive animals and we have carried out pasture renewal. We are also installing a reticulated stock water system and will be installing more fencing in the adjacent areas. We have approximately [REDACTED] effective hectares. If [REDACTED] to [REDACTED] hectares of adjacent grazing area are not allowed to be grazed that might be a loss of [REDACTED] of our effective area. This would significantly affect our ability to graze livestock through a drought. We are managing to get through present dry conditions, instead of having to de-stock, because the adjacent area has roughage accumulated from late spring/early summer. That loss of possibly [REDACTED] of our effective area would result in a decrease in income and impact negatively our ability to pay our bills. Because we have a small effective grazing area these present provisions have a significant negative impact on our finances, which will result in less money for improving the property filtering through to and for the community.

As well, if we are not allowed to clear vegetation e.g. blackberry, gorse, broom and hawthorn in areas adjacent to the remnant native bush there will be weed encroachment across what would have been productive pasture. It will not be native flora that spreads and overtakes the pasture. With increased area in scrub there will be an increase in the difficulty of pest control

The remnant native bush on our property is wired off. Undergrowth is growing, young trees are growing, flora other than beech are present. Native fauna is being attracted to the remnant. Whether the remnant is of sufficient size to regenerate itself we do not know. But that is what appears to be happening. This is happening without it being designated an SNA and while we are grazing livestock on adjacent pasture.

This provision does not allow us to change what we are doing. It does not allow us to change the character of what we are doing e.g. it does not allow us to change from beef to sheep, or goat. It does not allow us to change the scale or the intensity of what we do. It is a form of grandparenting in that it 'locks down' the area of an SNA. The provision appears to allow for how the consents officer on the day subjectively decides that existing activities will affect an SNA. Such an approach will give very inconsistent results. This provision fails in that it does not allow us to make a living from our farm or allow for our well-being.

Our submission is that:

- We support the intention of providing for existing activities but are concerned that 3.12 as proposed does not do this.

The decision we would like MfE and DoC to make is:

- We seek that 3.12 be amended to specifically provide for the following activities within and adjacent to an SNA and areas identified as important for mobile species, where there is an existing activity:
 1. Grazing of productive animals
 2. Pasture renewal
 3. Cultivation
 4. Vegetation clearance
- We seek that 3.12 be amended so that the temporal and spatial nature of existing activities as part of pastoral based farming are recognised. Specifically, vegetation clearance, cultivation, or pastoral renewal, that may occur within a 7-year rotational basis, also with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods.

- 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 attributes which underpin the significance of the habitat such as representativeness, rarity and distinctiveness.
- We seek that 3.12 be amended to delete requirements to maintain or protect the 'ecological integrity' of a habitat, where the 'ecological activity' of the habitat may have been impacted prior to notification of the NPSIB e.g. through existing impacts on the habitats ability to regenerate.
- We seek that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become SNAs.

3.13 General rules applying outside SNAs

If up to [REDACTED] of our farm is 'locked up' under these provisions that would be [REDACTED] hectares. Even if the adjacent [REDACTED] ha to [REDACTED] ha of pasture to the native remnant were to be 'locked up' it would significantly impact our farm's resilience and financial viability. Our costs would not decrease proportionally. We would still be paying increased rate bills and compliance costs brought about by national government and Tasman District Council policies.

The value of our property would be affected negatively because the presence of native bush would be viewed as detrimental instead of being viewed as, it presently is, an asset.

At present we live in a farm shed. One of our ambitions is to be able to build a house on our property. Under these provisions the decrease in production, thus income, and the increase in costs makes realising this ambition to be further and further away from fulfilment. As well, this farm is intended to finance our later years in retirement. These provisions will negatively impact our ability to be financially comfortable in retirement.

Indigenous biodiversity will not increase or flourish in 'locked up' areas of the farm. If we are not able to graze or clear vegetation e.g. blackberry, hawthorn, gorse, or broom, these exotic weeds will take over the 'locked up' area. Hawthorn is particularly vigorous and shading. Blackberry is also vigorous and smothers, as does Old Man's Beard. The Old Man's Beard is especially likely to spread to smothering the native flora. Pests such as opossums, rats and mice will flourish in 'locked up' areas. Pest control in thick scrub is problematic because of access through the scrub. Pest control along the edges of the scrub would kill only some of the pests present. These provisions will not only impact negatively on our ability to pay the costs of pest control, they will provide a habitat for pests.

At present, because we graze the adjacent areas and clear vegetation from the adjacent areas we can access the remnant native bush, trap for and bait for pests and assist the bush to flourish.

The provisions in this present policy will create an island of native flora within surrounding weeds. Pests feed on the native fauna, the seeds, the seedlings and the leaves. Pests destroy the native flora and fauna. If we are unable to access the native bush because of surrounding scrub the native flora will be lost and this proposed NPSIB policy will have been the reason.

We reiterate that when we purchased this property there were no native birds present in the remnant of native bush and the bush lacked undergrowth. Once we started trapping and baiting for pests, native birds, particularly fantails, appeared and the undergrowth began growing.

This provision forms a second class of SNA and does not establish the extent of the surrounding area to the primary class of SNA established. This form of SNA means that an SNA on a neighbouring property can impact negatively on our farming operation. This provision also allows for potential creep as the council will have to do a review every 2 to 3 years.

This provision adds costs to our rates and fails to take in to account our wellbeing, e.g. be able to enjoy our home. This provision has the potential to destroy our flexibility to farm our property and economically contribute to the local community as well as further afield.

Our submission is that:

- We support the intention of recognising areas around SNAs as important for protecting SNAs themselves and their values.

The decision we would like MfE and DoC to make is:

- 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 areas of our farm around SNAs being 'locked up' from pastoral based farming activities. This could result in significant areas of our farm being impacted which ultimately would significantly impact our farm's viability and resilience.
- We seek that 3.13 is amended to prioritise non-regulatory, partnership, and landowner led approaches to managing areas around SNAs in order to protect the attributes 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 co-design management frameworks for the farm which ensures that indigenous biodiversity is provided for as an inherent and integral part of the farming business. These plans can be provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.

3.15 Highly Mobile Fauna

At present we trap for opossums, rats and stoats as well as bait for rats and mice. It was only once we started doing this at the expense of our time and money did native fauna appear on our farm. Further, we have planted flax of which the flowers attract tui. Other natives we have planted include lacebark, kowhai, akeake, manuka, kanuka and koromiko, the flowers of which provide food for bees.

We receive no support from outside groups. The time spent and the financial expenses are ours. We do it because we care, because this is our home and because it involves our wellbeing.

Without effective widespread pest control New Zealand's biodiversity will be stymied. To increase biodiversity the focus needs to be on the trapping of pests which include cats.

It is not unusual for there to be one or two wild cats present on our property and in the neighbouring Pinus radiata plantation. Urban dwellers who cannot bring themselves, or do not want the cost of, to euthanize kittens and cats release the animals on the side of the road. These cats have a hard life, it is an unkind life, and until they die in order to survive they hunt and kill whatever they can catch to eat, which includes native fauna.

If the present provisions in the proposed NPSIB are passed then we will view native flora and fauna as a liability. 'Locking up' of portions of our property will have negative financial consequences for us and will increase the size of areas requiring pest control. Pest control is expensive in terms of time and money. How will we be able to pay for that when this present policy will decrease our income and increase our costs? We do not receive government subsidies and Tasman District Council have a large area to administer with a relatively low population base so rates holidays for land 'locked up' is likely to remain only a concept. We will not continue to establish native plants because it is expensive to do so and this proposed NPSIB penalises us for planting and looking after native flora and fauna. Our farm income will be directly affected negatively and the cost of rates paid to Tasman District Council will increase.

Locking up farmland will only increase the area of weeds, will eventually smother our areas of native plants (blackberry, Old Man's Beard, hawthorn), pests will eat the seeds, the native fauna,

and the plant seedlings. Remnants of native bush such as on our farm will not regenerate, will not be healthy, will slowly die away. This proposed NPSIB will have the opposite effect to the intention.

Our submission is that:

- We support with amendments.
- We support the intention to recognise and provide for highly mobile fauna through non-regulatory/partnership based frameworks generally, and where required regulatory approaches in relation to new subdivision and development.
- We oppose provisions which seek to mandate this protection through regulatory frameworks where this may impact on existing activities and land uses. Enduring and effecting conservation approaches to protect these species are best achieved through working with landowners, and in particular the role of the expert in working with landowners to build understanding of these species, their values, and any management which is required for these populations to be healthy and resilient.

The decision we would like MfE and DoC to make is:

- We seek that 3.15 is amended to prioritise non-regulatory, partnership, and landowner led approaches to managing mobile species and their habitat and lifecycle requirements.
- We seek that 3.15 is amended to prioritise engagement with the technical expert and landowner to co-design management frameworks for the farm which ensures that mobile species is provided for as an inherent and integral part of the farming business. These plans can be provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.

3.17 Increasing Vegetation Cover

This provision allows for gaps between what urban councils do and what regional councils decide in rural areas. It also allows gaps between regional councils. It makes restoration a legal obligation which falls on people living in rural areas.

Biodiversity is for everyone and thus everyone's responsibility yet urban dwellers contribute nothing while this provision puts the onus on people living in rural and semi-rural areas. And for rural areas this provision does not set a cap.

This provision allows for the grand parenting of the vegetation on our property which is detrimental to our property value.

This provision should allow for local catchment groups to organize for TDC to offer advice, for government funding and council funding to be available, and a non-regulatory approach should be taken. An incentive would be to allow the plantings to be given recognition of climate change benefits through He Wake Eke Noa.

Our submission is that:

- We oppose the current proposal but put forward changes.
- We oppose that restoration will become a legal obligation
- We support the intention of increasing biodiversity but are concerned that restoration will become a legal obligation
- We are concerned that there is no upper cap placed on councils outside urban areas.
- We are concerned that urban councils will purchase productive farmland on which to plant indigenous vegetation.
- We are concerned that property will be grand-parented to the native vegetation present.

The decision we would like MfE and DoC to make:

- We seek that urban councils should not be enabled to purchase productive rural land for the planting of indigenous flora.
- We seek that this provision is amended to prioritise non-regulatory, partnership, and landowner led approaches to manage planting of indigenous vegetation
- We seek that the emphasis on increasing biodiversity be placed on pest control
- We seek that funding be available from central government and council for land owner led non-regulatory partnerships on a catchment basis.
- We seek the council work along-side landowner led partnerships.
- We seek that plantings of native flora be given recognition of climate change benefits through He Wake Eke Noa.

Conclusion

New Zealand farmers have no option but to operate in a market economy. Unlike British and European farmers we do not receive subsidies, which make up a significant portion of their income. To operate effectively in a market economy and to be able to produce niche market high value food products we require flexibility. This proposed National Policy Statement for Indigenous Biodiversity by 'locking up' destroys our flexibility.

We reiterate that if biodiversity is to be increased the emphasis should be placed on pest control. We consider that placing the emphasis on expanding the area of native flora through regulation will be at a high cost to individual farmers, local communities as well as communities further afield, economically, socially and culturally, and damaging to peoples' wellbeing.

The generosity of landowners means that the area of indigenous habitat formally protected by QEII Covenants and Nga Whenua Rahui is growing. There are also landowners, such as ourselves, who are also quietly working to enhance the indigenous biodiversity of their properties. This is happening without invasive top down regulation that does not take into account local conditions and the well-being of people.

We are aiming to ensure that biodiversity on our property is an asset for us. We are aiming for protection and enhancement of indigenous biodiversity to be enabled within our farming system.

We are aiming for the benefits provided by indigenous biodiversity to be realised by us e.g. offsetting GHG emissions, social license, Country of Origin Branding is underpinned, market access and development. We are aiming for integrated landscapes, that biodiversity which includes ecosystem services coexist with productive profitable pastoral based systems.

Many farmers have a love of their farms and take great pride, as we do of our farm in the fauna and flora present. When we look out over our farm and the surrounding countryside we have views down and across the Motueka Valley and along the Motueka River. We see tourist vehicles stopping on the opposite side of the valley to enjoy the vista stretching out before them. We see the conservation work of council and generations of farmers reflected in the expanse of exotic trees planted and native bush present.

Thank you for the opportunity to comment on the proposed changes. We 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 please contact:

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