

## 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

### Personal Information

*\* indicates required fields*

Company name:

Given names\*: [REDACTED]

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## Submission

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

### Background about my farm

We farm on the North Canterbury coast alongside the Hurunui River. Our farm currently supports 3 generations of our family which has been our home since 1988. It is a sheep and beef property with a small area of irrigation with the majority dryland rolling and steeper hill country. We farm in a manner that suits our environment and will continue to adapt to climate and market developments.

We have fenced waterway boundaries and we have voluntarily protected areas of native. We have a conservation covenant on an area of grazing land that we are preserving in its existing state. These areas require ongoing maintenance to keep them free of weeds and pests. We are continually planting areas for aesthetic and environmental protection.

### Why am I making this submission?

I am making this submission to protect our way of farming life and to allow us to make our own decisions with regards to protecting and preserving areas of our farm. We wish future generations of our family to be able to enjoy the environment that we have protected and preserved on our farm while still being a financially viable enterprise that is able to adapt to the changing market and climate environments.

The proposed one size fits all biodiversity policy will fail to get landowner support because of the forced regulatory approach. We will be penalised for our past good efforts and create a liability on the land and on land values. This forced requirement and regulation will also create conflict with local councils and force even more cost on to land owners and ratepayers. The information will not be confidential and will allow misuse of private property information by individuals or groups.

Our existing covenant works well because of the ability to farm in our existing manner and respectfully allowing confidentiality of any information. The Government would be better to replace the policy with partnership agreements such as this and QEII covenants. Landowners attitudes to biodiversity have changed from years ago. Farmers no longer clear native forest for pasture but are protecting these areas instead. With forced regulation only minimal areas will be protected.

### Section A: General responses to the proposals:

- 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 QEII, Ngā Whenua Rāhui, and other covenants is growing.

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- I support provisions which recognise that for conservation actions to be enduring, they require landowner and community support and leadership. Policies need to recognise that people are critical to maintaining and enhancing biodiversity, and acknowledge the importance of respecting and fostering the contribution of landowners as custodians and Kaitiaki to these habitats and species.
  - However, I oppose provisions which seek to '*lock up indigenous biodiversity*' and in so doing penalise those landowners who have done the most to protect indigenous biodiversity. I seek changes to the policy to ensure that indigenous biodiversity can be integrated within pastoral based land uses and activities, and which recognise these can co-exist for mutual benefit.
  - Indigenous biodiversity should be considered as an asset to the farming business, and communities, and not as a liability. Areas we have fenced off require maintenance to protect from weeds and pests. We have protected areas that we can practically and financially manage. 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 areas of coastal native that we have protected voluntarily. We wish to protect these as they are aesthetically pleasing areas and we are able to farm around them with no impact on them. Our farm has many pockets of natural areas as well as plantation forestry and these areas are there because of how we currently farm as well as in the past and how we wish to farm in the future. We have areas of cover that we maintain as shelter for stock during periods of hot, cold or inclement weather. As these areas exist they also provide habitat for native fauna. They are there as we and past generations have chosen to leave them in their existing state.

## Section B: Impacts and implementation:

- I am deeply concerned about the potential impacts of these proposals on my farm in relation to areas being identified as Significant Natural Areas (SNA's), areas identified as being important for the protection of SNA's which may include land adjacent to SNA's, and the identification of highly mobile species, in relation to the impacts this may have on my 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 those that have done the most to protect indigenous habitats and species within their farming businesses could shoulder the greatest costs including restrictions to their farming businesses.
- The compliance costs of the various proposals are likely to be significant and include the identification of these habitats and species, fencing of these habitats (could require deer fencing to manage wild populations), and ongoing pest management. 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.
- I am concerned that New Zealand does not currently have the extent of technical expertise available to assist regional and district councils to identify SNA's and mobile species across their territorial areas within the next five years, to ground truth this work, and to work with farmers. The requirements on regional and district councils including timeframes should ensure that the identification of these habitats and species is robust, and is undertaken in a way which engages landowners and communities, builds understanding and knowledge, and which empowers local conservation efforts.
- As farmers we are suffering an enormous and increasing amount of regulation and compliance. We need to be recognised for a lot of work that we have already done. As farmers, we know our land, and know which areas can and need to be protected. SNA's are a form of land use grandparenting and will penalise us for protecting current and future areas through lower property values, lack of confidentiality and ongoing and increasing management costs.

Yours faithfully,

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██████████ North Canterbury.