

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: [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 are currently dairy farming in [REDACTED] in the Waitangi Catchment. The farm has a flat to rolling contour, and we have been farming here for the [REDACTED]. We are running approx. [REDACTED] [REDACTED] and beef animals on supporting blocks. The property is being continuously improved to meet up to date and efficient management systems, with a goal to be a long term, sustainable producing unit.

Why am I making this submission?

I am making this submission as I believe, although maintaining biodiversity is important for the future, we also need to consider the implications on the farmers, who are the main food producers. It seems that in the current draft there will be a lack of incentive for good practice, and for farmers that are undertaking measures to protect their SNAs. As stewards of the land, we have already taken active measures to exclude stock from wetlands and pockets of native bush, on our farm. We have pest management systems in our native bush. We have enhanced the waterways and wetlands by undertaking significant riparian planting with native flora, and have used local contractors to maintain and clear wetlands and waterways. On our farm, we have a diverse birdlife that live in the bush and wetlands, and it is through our good management that the birdlife has been able to flourish.

Section A: General responses to the proposals:

I support the overall goal of the proposals that recognise the value of indigenous biodiversity to New Zealand, its people, and communities, and to ensure that Indigenous Biodiversity is protected, and where it has been significantly lost is restored.

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. 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.

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.

Incentives that I believe would encourage farmers to preserve biodiversity on their farms is:

- Aid in technical expertise
- Allow a subdivision right either on site or transferrable to be created to incentivise to contribute to the cost of planting and maintenance

The specific provisions of the proposal that this submission relates to and the decisions it seeks are as detailed in the table in Section C below.

Section C: Specific responses to the proposals:

Specific Provision in the Proposed Plan	Submission	Decision sought
<i>The specific provisions my submission relates to are:</i>	<i>My submission is that:</i>	<i>The decision I would like MfE and DoC to make is:</i>
<p>Hutia Te Rito (Discussion document on a proposed National Policy Statement for Indigenous Biodiversity, page 23)</p>	<ul style="list-style-type: none"> • I support provisions which recognise and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks. 	

<p>3.7 Social, economic and cultural wellbeing:</p> <p>(Discussion Document Page 45)</p>	<ul style="list-style-type: none"> • I support the recognition that the maintenance of indigenous biodiversity can occur while still providing for use and development. • I support the recognition that people and communities are critical to conservation actions and the protection and enhancement of indigenous biodiversity. • I support provisions which empower and support landowner and community conservation activities and local approaches. 	<ul style="list-style-type: none"> • I seek that 3.7 is amended to recognise the importance of providing for farming land uses and business resilience, in supporting indigenous biodiversity protection. • I 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 recognise 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.
<p>3.8 Identifying Significant Natural Areas:</p> <p>(Discussion document page 31)</p>	<ul style="list-style-type: none"> • I support the intent of 3.8 in identifying Indigenous Biodiversity which is significant. However, the criteria appears really broad and in my opinion could capture any indigenous biodiversity irrespective of how common it is. Because the criteria is broad and examples are not provided of what habitats and species it is intended to cover, it is difficult for me to work out what it means to my farming business, and community. 	<ul style="list-style-type: none"> • I seek changes to provision 3.8 so that the significance criteria are narrowed so that habitats or species which are endangered, 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. • Exceptions can be provided for but should be specified in the regional or district plan.

	<ul style="list-style-type: none"> • While I support the establishment of a consistent approach to determining whether or not a habitat is significant, I 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. 	
<p>3.9 Managing adverse effects on SNA's (Discussion document page 42)</p>	<ul style="list-style-type: none"> • I support requirements to manage new activities that effect significant natural areas. 	<ul style="list-style-type: none"> • 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.
	<ul style="list-style-type: none"> • I oppose the current proposal, but put forward the proposed changes. 	<ul style="list-style-type: none"> • I seek that 3.12 be amended to specifically provide for the

<p>3.12 Existing activities in SNA's (Discussion document, page 49)</p>		<p>following activities within and adjacent to an SNA and areas identified as important for mobile species, where this is an existing activity:</p> <ul style="list-style-type: none"> ○ grazing of productive animals; ○ Pasture renewal; ○ Cultivation; ○ Vegetation clearance. <ul style="list-style-type: none"> ● I 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, along with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods. ● I 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. ● I seek that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become SNA's.
<p>3.13 General rules applying outside SNA's:</p>	<ul style="list-style-type: none"> ● I support the intention of recognising areas around SNA's as important for protecting SNA's themselves and their values. 	<ul style="list-style-type: none"> ● I am concerned that 3.13 as proposed may result in areas of my farm around my SNA's being 'locked up' from pastoral based farming activities. This could result in significant areas of my farm

<p>(Discussion document, page 51)</p>		<p>being impacted which ultimately would significantly impact my farm viability and resilience.</p> <ul style="list-style-type: none"> • I seek that 3.13 is amended to prioritise non regulatory, partnership, and landowner led approaches to managing areas around SNA's in order to protect the attributes that make a SNA significant. I seek that clause (2) is deleted. • I 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.
<p>3.15 Highly Mobile Fauna: (Discussion document, page 38)</p>	<ul style="list-style-type: none"> • I 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. • I 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 	<ul style="list-style-type: none"> • I 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. • I 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

	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.	provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.
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Conclusion

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.

For any inquiries relating to this feedback please contact [REDACTED]

Yours faithfully,

[REDACTED]

[REDACTED]

12/03/2020