

Submission to National Policy Statement for Indigenous Biodiversity - OPPOSE IN PART

My responses to the draft proposal:

- I tautoko the overall desire of the proposal that acknowledges the value of indigenous biodiversity to New Zealand, its people, and communities, and to ensure that Indigenous Biodiversity is both protected and restored.
- New Zealand's Farm Forestry members have retained millions of hectares of indigenous habitat within their farms and forests which is testament to the value farmers and foresters place on indigenous biodiversity. A large percentage of New Zealand's total indigenous habitats occur on the 8 million plus hectares covered by sheep, beef, dairy farms and forestry, with almost half of the QEII covenants being on sheep, beef, dairy farms with forestry farms.
- I tautoko provisions which acknowledge that for conservation actions to be enduring, they require landowner and community tautoko and leadership. Policies need to acknowledge that people are critical to maintaining and enhancing biodiversity while acknowledging, respecting and fostering the contribution landowners, as custodians and Kaitiaki, make to these habitats and species.
- However, I object to the provisions which hope to 'lock up indigenous biodiversity' and in so doing penalise those landowners who have done the most to protect indigenous biodiversity. I ask for changes to the policy to ensure that indigenous biodiversity can be integrated within forestry based land uses and activities, and which acknowledge these can co-exist for mutual benefit.
- Indigenous biodiversity should be considered as an asset to the forestry business, and communities, and not as a liability. 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 forestry based landscapes and forestry businesses is required to ensure that these values, habitats, and species, are sustainably managed. An over the top regulatory approach to the recognition and ongoing management of indigenous biodiversity could, if not carefully constructed, undermine existing and future conservation efforts already financed and implemented by future, current and past land owners.
- **Unexpected Consequences and Roll out :**

- I am very worried about the possible consequences of these proposals on my forest 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 consequences this may have on my forestry business and its resilience and viability. The provisions could effect land adjacent to and within these areas, which means that forest owners that have done the most to protect indigenous habitats and species within their forestry businesses could shoulder the greatest costs including restrictions on their forestry 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 and ongoing pest management. As currently proposed, it is unclear where these costs fall. Financial, technical, and human resourcing should be provided to assist landowners to continue to protect and restore indigenous habitats and populations within their forestry businesses and communities. Effort should be provided only to areas where indigenous biodiversity is being restored, but also to where it currently exists.
- I believe that our local regional and district councils do not have the technical expertise available to identify SNA's and mobile species across their territorial areas within the timeframe outlined. 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.
- **Hutia Te Rito:**
 - Tautoko with amendments.
 - I tautoko the objective of local authorities recognising and providing for Hutia Te Rito which acknowledges the relationships between indigenous biodiversity and people and communities, and that conservation requires kaitiakitanga and custodianship.
 - I would like to see that the term "stewardship" is replaced with "custodianship" which more accurately reflects the values I place on indigenous biodiversity within my forest and as part of my family's history and our future, and our relationship and ties to our land.
 - I tautoko provisions which acknowledge and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks.
- **3.7 Social, economic and cultural wellbeing:**
 - Tautoko with amendments.
 - I tautoko the recognition that the maintenance of indigenous biodiversity can occur while still providing for use and development.

- I tautoko the recognition that people and communities are critical to conservation actions and the protection and enhancement of indigenous biodiversity.
- I tautoko provisions which empower and tautoko landowner and community conservation activities and local approaches.
- I hope that 3.7 is amended to acknowledge the importance of providing for forestry land uses and business resilience, in supporting indigenous biodiversity protection.
- I hope that the NPSIB be amended so that policies and rules reflect Goal 3.7 including prioritising non regulatory approaches and partnerships over regulatory frameworks, and the establishment of conservation frameworks which acknowledge that the protection and where required enhancement of indigenous biodiversity can be provided within forestry based forestry land uses and alongside forestry based activities, and that these are not mutually exclusive.
- **3.8 Identifying Significant Natural Areas:**
 - object.
 - I tautoko 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 forestry business, and community.
 - I hope changes to provision 3.8 so that the significance criteria are narrowed so that only 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 values that underpin the habitats significance.
 - Amend provision 3.8 so that a habitat that is identified as "threatened" is only included if it is 0.25ha or greater and contiguous.
 - Amend provision 3.8 so that a habitat that is identified as "rare" if 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.
 - I hope 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".
 - I tautoko 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 an on the ground assessment, rather than just through reliance on spatial maps.

- I object 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.
- I hope 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 in informing the ongoing management of these habitats within forestry based land uses and activities, is an essential element to providing successful and enduring conservation outcomes.
- **3.9 Managing adverse effects on SNA's**
 - tautoko with amendments.
 - I tautoko requirements to manage new activities that affect significant natural areas.
 - I hope that 3.9 is amended so that the effects management hierarchy is based on the level of the habitats significance e.g. "endangered" or "threatened", and is tailored to the values which underpin the habitats significance.
 - Amend 3.9 so that the requirements relates to consent applications and the assessment of effects, and requirements to avoid, remedy, or mitigate the effects. New activities should be provided for where the effects of the activity on the values that underpin the habitats significance (such as representativeness, rarity, and distinctiveness) can be avoided, or 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 SNA's**
 - Object.
 - I tautoko the intention of providing for existing activities, but am concerned that 3.12 as proposed does not do this.
 - I hope 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 this is an existing activity:
 - Grazing of productive animals;
 - Pasture renewal;
 - Cultivation;
 - Vegetation clearance.

- I hope that 3.12 be amended so that the temporal and spatial nature of existing activities of forestry are acknowledged. Specifically, vegetation clearance, planting, cultivation, or forestry renewal, that also may be temporal in nature for example during drought periods.
- I hope 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 hope that 3.12 be amended to delete requirements to maintain or protect the 'ecological integrity' of a habitat, where the 'ecological integrity' of the habitat may have been impacted prior to notification of the NPSIB e.g. through existing impacts on the habitats ability to regenerate.
- I hope that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become SNA's.
- **3.13 General rules applying outside SNA's:**
 - I tautoko the intention of recognising areas around SNA's as important for protecting SNA's themselves and their values.
 - I hope amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for. I am concerned that 3.13 as proposed may result in areas of my forest around my SNA's being 'locked up' from pastoral based forestry activities. This could result in significant areas of my forest being impacted which ultimately would significantly impact my forest viability and resilience.
 - I hope 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 hope that clause (2) is deleted.
 - I hope that 3.13 is amended to prioritise engagement with the technical expert and landowner to co design management frameworks for the forest which ensures that indigenous biodiversity is provided for as an inherent and integral part of the forestry business. These plans can be provided for through tailored forest Plans bespoke to the biodiversity values and the forestry business.
- **3.15 Highly Mobile Fauna:**
 - I tautoko with amendments.
 - I tautoko the intention to acknowledge 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 object to provisions which plan 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.

- I hope 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 hope that 3.15 is amended to prioritise engagement with the technical expert and landowner to co design management frameworks for the forest which ensures that mobile species is provided for as an inherent and integral part of the forestry business. These plans can be provided for through tailored Forest Plans designed to the biodiversity values and the forestry business.

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