SUBMISSION

Proposed National Policy Statement for Indigenous Biodiversity

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Introduction

1. Irrigation New Zealand represents over 3,000 members nationally, including irrigation schemes, individual irrigators, and the irrigation service sector. Our irrigator members include a wide range of farmers and growers – sheep and beef, dairy and cropping farmers, horticulturalists, and winegrowers. We represent over 120 irrigation service industries – manufacturers, distributors, irrigation design and install companies, and irrigation decision support services.

2. We are a voluntary-membership, not-for-profit organisation whose mission is to create an environment for the responsible use of water for food and fibre production.

3. As an organisation we actively promote best practice irrigation and carry out a range of training and education activities. Over the last five years we have trained over 3,000 irrigators on different aspects of irrigation best practice to improve water use efficiency and better manage environmental effects.

4. Irrigation New Zealand members share many of the same goals as other New Zealanders:
   - to reduce their environmental footprints and see improvements in the health of our waterways
   - to improve the health of New Zealand’s unique indigenous biodiversity and ecosystems
   - to contribute to the wellbeing of their communities
   - to provide for a sustainable future for New Zealand.

5. Irrigation New Zealand appreciates the opportunity to provide feedback on this important proposal. Whatever the final outcomes of this process at the national level, implementation "on the ground" will be a crucial factor in the success or otherwise of planning.

6. Irrigation New Zealand would therefore urge consideration to be given to implementation when making decisions on this and other policy proposals in train, such as the Proposed National policy Statement for Highly Productive Land and the Essential Freshwater package. Capacity and capability to roll out some of these measures and regulations is a real concern – both for those working in the sector and for regional authorities, who are already under considerable pressure in relation to the levels of service they provide with a very limited source of funding.

7. Irrigation New Zealand recognises the need to improve and maintain our indigenous biodiversity and unique ecosystems.
8. Effective planning that incentivises regional, catchment-scale, and farm-level responses will lead to better outcomes as well as supporting the contribution farming and growing makes to our country’s wellbeing.

**Narrative submission**

9. Irrigation New Zealand supports the submission of Federated Farmers of New Zealand as follows.

10. The success of a National Policy Statement for Indigenous Biodiversity (NPS-IB) will hang upon the Government’s commitment to the partnerships, support and other key measures recommended in the Biodiversity Collaborative Group’s report ‘Complementary and Supporting Measures for Indigenous Biodiversity.’ These measures are referred to from now on as Complementary and Supporting Measures (CSM).

11. Getting the criteria for Significant Natural Areas set at the right level is absolutely critical to the success or failure of the process. If the criteria are set too broadly, there is a real risk that all or most indigenous biodiversity will be captured through the regulations. In that scenario, repercussions will be extensive. Many farming operations may be unable to continue operating as viable units. If there are insufficient resources, capacity, and capability across councils (particularly within consenting teams) effective implementation will be hampered or prevented.

12. Any regulation should be shaped to sustainably manage and protect significant biodiversity values, while non-regulatory methods should be used to encourage the on-the-ground gains for biodiversity, through advice, support, partnerships and incentives. Costs of any regulatory proposals must not be underestimated, and a balance must be struck between necessary interventions and actions, and enabling the continuation of primary production.

13. Provision for additional compensation should be developed in instances where land is rendered economically unfeasible for existing land use as a result of biodiversity regulation, beyond that provided for under section 85 of the RMA.

14. The implementation of the NPS-IB across the country will ultimately define the success or failure of its objectives. Quality, succinct and clear guidance is needed alongside the NPS-IB, to clarify those matters that are currently ambiguous or raising more questions than answers.

15. Not only will these factors be critical in the successful implementation of the NPS-IB, but also critical if we are to realise the Primary Sector Council’s Vision of New Zealand’s
agriculture, food, and fibre sector’s being “fit for a better world” through the incorporation of taiao into farm systems.

Complementary and Supporting Measures

16. Irrigation New Zealand further supports the submission of Federated Farmers of New Zealand in relation to the provision of CSM and their requirements, which they define as:

- Firstly, to ensure there is sufficient knowledge, information, advice and support available to assist landowners, and to ensure sufficient monitoring and reporting to gauge success or otherwise of initiatives; and
- Secondly, to ensure adequate funding and resources are available to councils, community organisations and landowners who require it.
- Thirdly, to recognise and enable landowner efforts.

17. Irrigation further supports the submission of Federated Farmers of New Zealand that the following initial actions be implemented:

- Ensuring sufficient monitoring and reporting of biodiversity outcomes to ensure appropriate tracking of success/failure of initiatives/progress.
- Funding for local authorities to identify, preserve and foster areas of biodiversity on private and public land, including the provision of advice to farmers and meeting costs associated with ecological assessments.
- Decision making tools to enable farmers to integrate biodiversity values effectively and efficiently into their farm decision making.
- A contestable fund or funds to provide funding for costs associated with the preservation of indigenous biodiversity, including pest control and fencing, available to both individual and collective projects.
- Direction to, and funding for, local and regional councils to develop and implement rates remissions policies for areas of biodiversity on private land.
- Carbon credits for the greenhouse gas emission mitigation provided by areas of significant biodiversity.
- Tax incentives for costs associated with biodiversity.
- Sufficient funding for and acknowledgement of the importance of farmer facing information and extension programmes, for example the QEII Trust and the NZ Landcare Trust, and expansion of the funding streams available to these entities to investigate potential biodiversity projects and support landowners and the community in applying for funding.
18. Irrigation New Zealand is particularly concerned with the impacts of introduced and pest species on the health of our indigenous species.

19. As part of any CSM package, significant support for pest management programmes must be included. Irrigation New Zealand is concerned that a lot of money could be spent on developing regulations and plans, but if the key drivers of biodiversity decline in some areas are the presence of pest or predatory fauna, then biodiversity outcomes may not improve.

20. Further, Irrigation New Zealand would urge the consideration of how the objectives which the NPS-IB can be achieved through the mechanism of Farm Environment Plans (FEPs).

21. The irrigation sector is at the forefront of the development and implementation of FEPs as a means of improving environmental outcomes, encouraging good management practices, and enabling innovation at the farm-level.

22. As stated in our submission on the Essential Freshwater Package, Irrigation New Zealand supports the proposal that FEPs with a freshwater module become compulsory.

23. However, we are concerned about the capacity and capability within the broader primary sector and local government to develop and audit the large number of plans that will be required across the country. Irrigation New Zealand recommended that the roll-out be targeted to at-risk catchments first, in order that the gains from FEP implementation will be realised most quickly, where it is most needed.

24. We submit that consideration be given in CSM processes to the use of FEPs as a means of promoting the protection and enhancement of indigenous biodiversity outcomes. If FEPs are to become compulsory, it would seem a good use of resources for FEPs to be the vehicle for both indigenous biodiversity and freshwater quality outcomes, rather than developing parallel processes which would like involve duplication of effort, time, and capacity.

Alignment with Essential Freshwater and other policies

25. As stated in Irrigation New Zealand’s submission on the Essential Freshwater policy package, we urge the government to ensure that the objectives and policies within the NPS-IB do not come into conflict with other national-level policies, including the National Policy Statement for Freshwater Management and the National Policy Statement for Highly Productive Land.

Wetlands

26. Irrigation New Zealand supports the limitation of the NPS-IB to terrestrial environments (i.e. not including coastal marine or freshwater ecosystems, except for a few exceptions like wetland restoration and Regional Biodiversity Strategies). However,
we do reiterate the need to ensure that there are not conflicting provisions within the NPS-IB and the National Policy Statement for Freshwater Management.

27. For example, the Freshwater Management NPS requires councils identify and map inland *natural* wetlands, whereas the provisions of the NPS-IB around restoration and enhancement apply to all wetlands and former wetlands. Care needs to be taken when regulations are crafted so that the sought outcomes and processes to achieve them are complementary.

28. Irrigation New Zealand supports the protection and enhancement of wetlands. However, the formulation of rules should not lead to perverse outcomes, particularly in relation to promoting the construction of wetlands as a method of improving water quality but then disincentivising this through costly and complex resource consenting regimes created by the requirements of biodiversity enhancement.

**Increasing indigenous vegetation cover**

29. Irrigation New Zealand is supportive of the need to increase indigenous vegetation cover, particularly in areas where the cover is currently small.

30. As a percentage *increase* in indigenous cover for rural areas has not be specified, the “10 per cent” cutting criteria in regions creates a risk in implementation that this 10 per cent becomes a fast target - akin to a “limit.”

31. For example, if 10 per cent coverage were to be “set” as a target for the Canterbury Plains, it would require the re-establishment of approximately 120,000 hectares of indigenous cover. There are significant implications if this were to occur, particularly in relation to the economic effects at the community and regional level, of such large areas of otherwise productive land being unable to be cultivated.

**Conclusion**

32. Irrigation New Zealand would like to work alongside the Ministry for the Environment and Regional Councils in the implementation of the National Policy Statement for Indigenous Biodiversity.