DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Submission on the publicly notified draft National Policy Statement for Indigenous Biodiversity.


To: Ministry for the Environment

Personal Information
Company name: [Redacted]
Given name: [Redacted]
Contact person: [Redacted]
Address: [Redacted]
Region: Tasman
Email: [Redacted]
Submission

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

Background about my farm

- **Our farm borders the urban settlement of Wakefield in Tasman District**
- **My husband and I have worked extremely hard to start with nothing and put together this [redacted] ha farm. Our farm now has a common boundary with my family farm of which I was brought up on as fifth generation of my family.**
- **My husband works off farm which has enabled us to be farmers and assist with sustainable development of our farm.**
- **Farm is [redacted] su currently. We farm sheep, beef and deer, breed and finish all our stock. We also purchase additional stock to finish in all 3 species.**
- **We take great pride in trying to produce premium quality food of which care of our stock and property are important values in our food producing philosophy.**
- **Our current farm we have owned [redacted] ha for 23 yrs and added [redacted] ha six years ago which we purchased from a fifth generation neighbour.**
- **We were concerned that the land would be sold to subdividers and become fragmented, and unproductive with no weed control as a lot of the adjoining rural residential that we border.**
- **We have massively upped production, done much riparan planting and tree planting.**
Why am I making this submission?

- I have a passion for NZ open spaces. All my recreational activities are centered on being in NZ stunning natural environment. I ski tour, tramp, fish, mountain bike, kayak, mountain climb, swim and at 61 years of age am still very active. I used to adventure race.
- My garden I started from scratch and is full of native trees and shrubs and it gives me great pleasure to have lizards, Tui, Waxeyes, Bellbirds, Pidgeons, King Fishers, Harriers, Wekas, Pukeko’s visit.
- I value and takes huge pleasure from being in environments untainted by mankind.
- I have an aversion to plastics and rubbish impacting our environment.

Section A: General responses to the proposals:

- I support the proposals that recognise the value of indigenous biodiversity to New Zealand, and agree that it needs to be protected.
- 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.
- 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 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.
• I have planted thousands of trees and shrubs during my 30+ years of owning rural land. My father passed on his love of trees to me and both of my adult children are inclined the same as myself and their grandfather.

• To date environmental enhancement has been about stock needs and clean waterways. We have established wetland areas that have been fenced and planted with another in progress.

• We own ha of native bush in the block we purchased 6 yrs ago, which has some magnificent native species in. This has been a dilemma for us as it is infested with old mans beard from an adjacent neighbouring exotic forest so has yet to be fenced of for that reason.

• We also own ha of exotic plantation which fits nicely with our farm but am concerned that we maybe forced to plant more as a response to Carbon Zero bill but feel will not be in the best interests of waterways and biodiversity.

• Every year we choose what we call a priority area that we work on on our farm to enhance the environment. This we do in conjunction with our farm staff so we have them on board as well.

• I take great pleasure in watching trees grow and enhance the farm. It creates wellbeing for stock, people and biodiversity.

• To date we have completed over km of fencing that has assisted in enhancing our farm environmentally.
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.

- 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:

<table>
<thead>
<tr>
<th>Specific Provision in the Proposed Plan</th>
<th>Submission</th>
<th>Decision sought</th>
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<tbody>
<tr>
<td>The specific provisions my submission relates to are:</td>
<td>My submission is that:</td>
<td>The decision I would like MfE and DoC to make is:</td>
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</tbody>
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| Hutia Te Rito (Discussion document on a proposed National Policy Statement for Indigenous Biodiversity, page 23) | • I support with amendments.  
• I support the objective of local authorities recognising and providing for Hutia Te Rito which recognises the relationships between indigenous biodiversity and people and communities, and that conservation requires kaitiakitanga and custodianhip.  
• I support provisions which recognise and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks. | • I seek that the term “stewardship” is replaced with “custodianhip” which more correctly reflects the values I place on indigenous biodiversity within my farm and as part of my family’s history and our future, and our relationship and ties to our land. |

3.7 Social, economic and cultural wellbeing:  
(Discussion Document Page 45)

<table>
<thead>
<tr>
<th>Submission</th>
<th>Decision sought</th>
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| • Support with amendments objective 3.7.  
• 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 seek that objective 3.7 is retained as notified.  
• 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 |
I support provisions which empower and support landowner and community conservation activities and local approaches. 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.

### 3.8 Identifying Significant Natural Areas:
(Discussion document page 31)

- Oppose
- 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.
- I 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
- I 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 in 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.
- 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.
- Amend provision 3.8 so that a habitat that is identified as
| 3.9 Managing adverse effects on SNA’s | I support with amendments.  
- I support requirements to manage new activities that effect significant natural areas. | I seek 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 provision relates to consent applications and the assessment of effects, and |
February 2020

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<thead>
<tr>
<th>3.12 Existing activities in SNA’s</th>
<th>I oppose the current proposal, but put forward the proposed changes.</th>
<th>I support the intention of providing for existing activities but am concerned that 3.12 as proposed does not do this.</th>
<th>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, cultivation and pastoral renewal and grazing of livestock are critical to our economic viability.</th>
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- 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.

- I 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 this is an existing activity:
  - grazing of productive animals;
  - Pasture renewal;
  - Cultivation;

- 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 requirements to avoid, 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 avoided, remedied, or mitigated.
attributes which underpin the significance of the habitat such as representativeness, rarity, and distinctiveness.

- I seek 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 seek that 3.12 be amended to delete restrictions on the ability to undertake an existing activity in areas which have become SNA’s. Fencing off our native bush would be counter productive as it stands currently. Who would do the weed control?

<table>
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<th>3.13 General rules applying outside SNA’s:</th>
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<tbody>
<tr>
<td>• I support the intention of recognising areas around SNA’s as important for protecting SNA’s themselves and their values.</td>
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<tr>
<td>• I seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for.</td>
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<td>• 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.</td>
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<tr>
<td>• 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.</td>
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<tr>
<td>• I seek that 3.13 is amended to prioritise engagement with the technical expert and landowner to</td>
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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:
(Discussion document, page 38)

- I support with amendments.
- 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 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 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 provided for through tailored Farm Plans bespoke to the biodiversity values and the farming business.

### Conclusion
• Farmers are generally the best caretakers of the land as they have so much at stake. Farmers prefer to be guided as to best practices. Every farm is different and blanket regulation does not take into account the individual economic and social wellbeing of farmers.

• All NZ’ers should be engaged and contributing to Indigenous Biodiversity, as well all benefit.

Yours faithfully,

14/3/20