

**INDIVIDUAL SUBMISSION
ON PROPOSED NATIONAL POLICY STATEMENT
FOR INDIGENOUS BIODIVERSITY**

TO: MINISTRY FOR THE ENVIRONMENT
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Submitter's Name and Contact Details

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Introduction

██████████ is a ████████ ha Canterbury High country property. ██████ and ██████ have managed the property for the last 16 years and raised our ██████ children here. We employ ██████ permanent staff and ██████ regular casuals. The property was bought by an American investment group five years ago. Since the group has come on board, we have been able to develop the land at the same time as investing in the protection of IB, such as the fencing of Winding Stream and other waterways. For the NPSIB to be implemented to the highest level of effectiveness, a collaborative approach to mitigation is crucial to ensure all possible implications are anticipated.

Biodiversity on our farm

██████████ is an Outstanding Natural Landscape(ONL) area with an extensive array of biodiversity with tussock grasslands, wetlands, and significant waterways. As an integral part of our farming operation, native scrub and tussock provide shelter for young stock during lambing and calving as well as winter cover for mature stock. More so, ██████████, similar to other large parts of New Zealand High country, is faced with wilding pines, hiraciame, and other introduce weeds that threaten our native biodiversity. This is where we have found farming and reservation work hand in hand to ensure we reserve our ONL for future generations. If controlled levels of grazing over the property are not sustained, we risk these species taking over and decimating the native species and the ecosystems that they house. To maintain this high level of care and to reach true sustainability, the farm needs to be viable. Without a steady return, the farm would not be able to reinvest money or time into improving its significant natural areas.

How best practice should be applied for a balanced and sustainable farm system

Conventional high country farming interacts with long slow ecological processes.

1. Farming on the culturally-induced tussock grasslands encourages the growth of native vegetation such as matagouri to the point that eventually over a thirty-year cycle, the grazing disappears. The plan needs to allow for the clearance of vegetation where land is actively farmed, and fertiliser is applied.
2. Where hieracium has invaded tussock grasslands, the plan needs to allow for the restoration of pastoral farming with productive species on farmable land, or the economic base of many farms will collapse. This requires the clearance of native vegetation as weel as the hieracium.

How the NPS will impact my farm

We all have a part to play in ensuring we protect our land and need to work together to do so collectively. However, the draft NPS uses legal terms such as avoidance and precautionary to guide change, which will lead to unduly heavy restrictions and abrupt legal decisions being set before all outcomes can be carefully considered. Each farm is different, and a decision made without full transparency of outcomes could be catastrophic for the environment and the farm. Therefore, by changing certain sections of the NPS to allow flexibility of decisions, the NPS has the potential to benefit everyone and make the positive change it is intended to do so

Conclusion

We are supporters of the overall objectives of the NPS and hope that all submissions are carefully considered to ensure the overall outcome is as intended. We believe that if the approach is not collaborative and flexible, there will be long term adverse effects on the viability of our farming operations, and more importantly, the subsequent negative impact on IB and the country.

Detailed submission comments on the DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Part 1 – Preliminary Section

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
1.7 Fundamental Concepts			
Existing activit	Partially support	Oppose the concept that renewing a consent is considered a new consent which take away from existing activity	

Part 3 – Implementation requirements

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
3.6 Local authorities must adopt a precautionary approach toward proposed activities if the effect on IB are uncertain...those effects	Oppose	I don't support the wording of this clause as it is very broad. There are clear cases where the health of biodiversity is a direct result of the farming activity, and this clause could provide a platform for farmers to express the extent we currently protect biodiversity. The	"must adopt a collaborative precautionary approach."

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
are potentially significantly adverse		word precautionary is not flexible and limits the approach.	
3.7 Social, economic and cultural wellbeing – all local authorities must recognize			
c) People are critical to maintaining and enhancing IB	Support	This recognizes the importance of people	Should be stronger and quantified, identified thru documentation like FEP
d) Importance of forming partnerships between local authorities, tangata whenua, landowners...in maintaining and enhancing IB	Support	Recognises the importance of a collaborative approach	Needs to tie into clause 3.6 and the word of Collaborative
e) Importance of respecting and fostering the contribution of landowners as stewards and kaitiaki	Support	Recognises that landowners and stewards of the land care about the land and do work to maintain IB.	Needs stronger quantifying.
f) The value of supporting people and communities in understanding, connecting to and enjoying IB	Partially Support	People also need acknowledgment of their understanding of IB	
3.8 Identifying significant natural areas – every territorial authority must:			

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
(1)(a) undertake a district wide assessment in accordance with Appendix 1 to determine if an area is significant indigenous vegetation and /or significant habitat of indigenous fauna; <i>and if it is,</i>	Partially Oppose	The authorities are under-resourced to carry out a district-wide assessment if this is not completed accurately, and in conjunction with landowners, the result will create uncertainty as to how to farm and inflexibility around current permitted activities.	A better assessment of the costs associated with carrying out the assessments. Ensure there is enough resources to complete the assessments collaboratively, without relying on desk top mapping. Allow landowners to submit on any proposed area
(1)(b) classify areas...as either High or Medium, in accordance with Appendix 2	oppose	I don't support this as the criteria in appendix 2 is very broad and could result in whole farms being identified as SNA	The definitions in appendix 2 need refining in relation to extent and districts
3.9 Managing adverse effects on SNAs			
(1) except as provided in subclause 2, (3), (4), local authorities must ensure that (the following list of adverse effects on the SNA are avoided)	Oppose	The legal definition of avoid is not to allow. Our consent to Farm is for five years. At the time we renew, this will be treated as a new consent. The way this clause is written will create uncertainty as to how I can farm.	The word should be mitigate
3.12 Existing activities in SNAs – regional councils' policy statements must provide for existing use activities that may adversely affect IB			
(3) ...local authorities must (a) ensure the continuation of an existing activity will not lead to the loss, including through	oppose	This is a very broad statement. The way the proposal is written will not bring certainty to how we can farm.	There needs to be clear definitions

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
cumulative loss, of extent or degradation of the ecological integrity of any SNA; and			
(2) If an area outside an SNA is assessed as significant indigenous vegetation and significant habitat of indigenous fauna following an assessment in accordance with Appendix 1, a local authority must manage the adverse effects on indigenous biodiversity in the area as if the area were an SNA.	Oppose	This is very broad and could result in whole farms being SNA which creates uncertainty around how we farm	

Appendix 1 – Criteria for identifying significant indigenous vegetation and significant habitat of indigenous fauna

Draft NPS reference section	Support, Oppose or Partially Support	Reasons Why	Suggestion or recommendation
The four criteria for identifying significant indigenous vegetation or significant habitats of indigenous fauna, including key assessment principles and attributes			

