Feedback on National Policy Statement for Indigenous Biodiversity

We, [ ] , are farmers in the Nelson Lakes area, Tasman District.

The area of our farm is [ ] hectares (ha) and of this area [ ] ha is in native bush and forest. The bush and forest area is not fenced. The land we farm is fenced. There is some grazing by cattle in unfenced areas. Most fenced paddocks have some area of indigenous vegetation within the paddock. This provides shade and shelter.

We farm sheep, cattle and deer.

We have a grazing license agreement with Tasman District Council for our stock to graze in some forestry areas.

The farm borders Nelson Lakes National Park, the Howard Conservation Area and Tasman District Council forestry land.

We support

- The principle of protecting indigenous biodiversity

BUT this needs to allow farm systems to integrate with the protection of biodiversity.

Points for Comment

3.6 Precautionary approach. As most of NZ indigenous biodiversity has little information known or recorded, and authorities are advised to take a precautionary approach where effects are uncertain, this may impose a huge burden of proof on landowners. It may preclude activities that happening now.

We oppose this point due to the lack of information.

We suggest that activities that may concern the authorities are monitored, and that this is paid for from a national fund until sufficient information is gained.

The botany team from DOC Nelson Lakes monitors an area where our cattle graze and a rare plant lives. The team has reported to us that the cattle do not seem to have any detrimental effect on these plants and in fact they are probably growing better in the light grazing environment than if there was no grazing.

Due to the large amount and widespread native vegetation on our farm this could make most of our land not available for farming.

3.7 Social, cultural and economic wellbeing

We support this point.

We consider it part of our duty and pleasure to act as kaitiaki.
There can be a positive interplay between the indigenous biodiversity, us and our business.

Our deer paddocks have copious kanuka trees- we enjoy looking at them, they support bird and insect life and act as shelter and shade for the animals.

3.8 Identifying SNAs

We oppose this point.

The criteria for identifying SNAs are too broad. Given that a tick in any one of the four categories makes an area a SNA means that huge areas will be captured.

We have lots of bush that is “representative” – but have thousands of ha of publicly owned land adjoining our farm that has the same bush.

“Rarity and distinctiveness” - this needs to be district specific.

“Ecological content” – where will the supply of terrestrial ecologists come from and who will pay for them?

The idea of standardizing the criteria is good, but the detail is not yet correct.

Under this restriction most of our farm would not be available for farming.

3.9 Managing effects on SNAs

Please remove the word “avoid” and replace it with “manage”

We oppose this point.

Maintenance of areas should not need to exclude their use.

Due to the lack of recorded information on biodiversity proving that an effect is very minor is a major hurdle. The wording of this point sounds like an exclusion.

To remain viable farming business people we need to be able to adapt and modify what we do.

We don’t know what changes will be coming, but are sure there will be changes.

This point may prevent us making necessary adaptation.

3.12 Existing activities in SNAs

We oppose this point.

The points as written are very broad and need definition e.g. ecological integrity.

We have areas that could be classed as SNAs because we keep them and look after them. This would mean that we can’t change anything.

It doesn’t allow for us making a living.
Our farming activities benefit some rare species – e.g. we have considerable numbers of banded dotterels in the cultivated paddocks near the river. More cultivated land would offer them more foraging.

3.13 Areas around SNAs

We oppose this point.

It needs definition of how big the area around the SNA is going to be.

It the case of a wetland this definition could have a catchment wide effect.

We have streams and wetlands identified on our property.

A large area of our farm may be included in an SNA.

3.15 Highly mobile fauna.

We oppose this point.

It needs further definition to make it functional.

Who will pay for this?

We suggest that local authorities should offer support, information and advice and work as a partnership.

We occasionally have kea around the farm – and we would welcome support to survey and record these.

3.17 Increasing vegetation cover.

We support this in part – the plan to increase vegetation levels throughout the country.

We oppose this in part- What is the definition of district? We suggest in the council can ” choose a target amount”, that upper and lower limits are prescribed.

This could be done in community groups – e.g. a catchment, where different participants provide different inputs.

Our Concerns

The protection of biodiversity must be the responsibility of all New Zealanders. The very large costs will need to be shared for biodiversity protection to be practical.

This document potentially makes farmers responsible for actively managing weeds and pests, fencing SNAs and possibly retiring the land. This imposes huge costs.

We suggest that restoration projects should be non-regulatory and should focus on supporting local conservation efforts.
There are significant costs for councils under the NPSIB. The low number of experts available for mapping may mean that desk top mapping is used. From previous experience we oppose desk top mapping.

**In Summary**

We welcome a policy that recognises, rewards and incentivises biodiversity work on farm.

We want to protect and enhance the indigenous biodiversity on our property while remaining a profitable pastoral farm.

We would like receive some benefits from this - offsetting GHG emissions, social license, market access and development.

If the NPSIB proceeds unchanged we would probably not be able to operate a farming business.

At present we both work on the farm, plus one full time employee and numerous contractors eg a shearing gang, transport truck operators. There would be noticeable flow on effects in the supply chain if we go out of business. We would also not be generating income to protect the biodiversity that is present. Our contribution to the taxation system would be reduced.