

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

To: Ministry for the Environment
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Submission: **Oppose** the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.

Introduction

- 1 I am [REDACTED] [REDACTED]
- 2 I **oppose** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall I consider that unless the document is substantially modified it will result in significant costs for limited environmental benefit, and creates real risk of exacerbating the loss of biodiversity on private land.

Support for indigenous biodiversity

- 4 I support the broad objective of the Proposed NPS and am very conscious of the value of biodiversity. I pride ourselves on being environmentally responsible and adopt sustainable management techniques throughout my business operations.
- 5 Notwithstanding my support for indigenous biodiversity, I do **not** support the Proposed NPS in its current form because it is likely to result in unnecessary additional costs without achieving any material gains in maintaining indigenous biodiversity within farming operations.

General concern with Proposed NPS

- 6 The excessive breadth of the criteria for identifying SNA at Appendix 1 of the Proposed NPS means that large areas of farm land could be identified as SNA. The surveys required to complete this task would come at enormous cost and achieve little benefit in terms of maintaining indigenous biodiversity.
 - 7 Policy 3.9 requires that adverse effects of activities on (a) threatened or at-risk flora must be managed, and (b) significant habitat for threatened or at-risk indigenous fauna must be managed, to maintain long-term populations of such fauna.
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- 8 I am very concerned about what this means in practice. For example, it's unclear how these values will be identified, and what requirements will be imposed on farm owners to manage and maintain them.
- 9 With respect to other indigenous biodiversity within farm areas, policy 3.12, policy 3.13 and policy 3.15 require local councils to maintain indigenous biodiversity (including highly mobile fauna) by amending their plans to manage adverse effects of land use on such indigenous biodiversity. These policies could lead to new and stringent regulation of harvesting activities. Again, I am very concerned about what this means in practice.
- 10 Under policy 3.16 on restoration and enhancement should a farming operation be required to attain consents in the future, Local authorities may impose or review restoration or enhancement conditions on resource consents and designations relating to activities in areas prioritised for restoration and enhancement. Again, I am very concerned about what this means in practice.
- 11 When a resource consent application is triggered by indigenous biodiversity controls, policy 3.19 contains onerous requirements for assessment of potential adverse effects which would be very expensive to complete in the context of large scale land use.
- 12 Overall, it is reasonable to anticipate that the Proposed NPS in its current form will be relied upon to impose significant new restrictions on farming. Such measures would impose considerable additional costs on farming operations.
- 13 I consider that the Proposed NPS should be substantially modified to address the above concerns and should place much more emphasis on non-regulatory measures and incentives to support positive outcomes for indigenous biodiversity within farming operation areas.
- 14 I also support the submission filed by the Federated Farmers.

Potential implications for biodiversity

- 15 I consider that farm operations can be beneficial for the maintenance and restoration of indigenous biodiversity. Some farming operations can disturb indigenous biodiversity values. However I consider well managed farming operations present little overall threat to biodiversity values.
- 16 In addition, many farm owners take active steps to maintain and enhance indigenous biodiversity values in farming areas through restoration and enhancement of SNA's, monitoring biodiversity, pest and predator control, and partnerships with other stakeholders.
- 17 I am concerned that farm owners may be deterred from pursuing these voluntary initiatives if they perceive that improving biodiversity outcomes within their farming area will lead to more onerous regulatory control over farming operations. This is not a good outcome for biodiversity, but one which is at real risk of occurring if the Proposed NPS is introduced in its current form.

Overall costs, benefits and alternatives

- 18 I consider that the intended public benefits to biodiversity will not eventuate and that the Proposed NPS in its current form will not be effective at achieving its objective on farmland.

- 19 In contrast, I consider that the risks and costs of the Proposed NPS are much more significant and much more certain. These costs have been discussed above.

Conclusion

- 20 I **oppose** the Proposed NPS in its current form on the basis that it will not be effective or efficient at achieving its objective of protecting biodiversity on farmland.
- 21 It will potentially generate an adverse reaction from farm owners that threatens the very values that the Proposed NPS seeks to protect and will create significant and disproportionate costs for responsible landowners that are already taking steps to actively manage biodiversity on their land.
- 22 I strongly support the continued and increased use of non-regulatory methods and incentives as the most effective way to achieve the desired biodiversity objectives. Such measures can encourage and support positive actions from farm owners and ensure that the costs of such measures are equitably distributed amongst all those who benefit from the shared biodiversity values.
- 23 I seek that the Proposed NPS be substantially modified to address the concerns raised above or otherwise that it be withdrawn.

Thank you for the opportunity to submit on the Proposed NPS.

Dated 14 March 2020

Via Email.

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