

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

Background about my farm.

Operating on the family farm, part of which ( [REDACTED] acres) has been owned (1886) and operated (1892) by 4 generations of our family, for over 125 years. We graze a closed herd of around [REDACTED] cross cows plus replacements. This is down from a peak in 1984-88 when my father ran over [REDACTED] cows on less area.

The farm consists of [REDACTED] hectares ([REDACTED] acres), in 5 titles and is leased from the [REDACTED] [REDACTED] with a further [REDACTED] hectares ([REDACTED] acres) alongside, leased from a neighbour.

I have a strong affinity with the land and livestock on it. This is a strong driver of my business as I try to farm in a sustainable way.

A number of areas of bush were left around significant trees, by my grandfather, and I am in the process, when funds and time allow, of fencing these off. The [REDACTED] largest areas have been fenced and are covenanted with the QEII National Trust.

Topography and soil types are at times a challenge, but the [REDACTED] is a beautiful spot and farming here is where I belong, my turangawaewae. Ko au te whenua. Ko te whenua ko au. (I am the land. The land is me.)

[REDACTED] ha	Freehold		[REDACTED] ha	Flat
[REDACTED] ha	Effective		[REDACTED] ha	Rolling
[REDACTED] ha	Bush (fenced)		[REDACTED] ha	Hilly
[REDACTED] ha	Bush (unfenced)		[REDACTED] ha	Steep
[REDACTED] ha	Buildings, races etc.			

Why am I making a submission?

We are doing much of this already but need to make sure regulations are workable on farm and that regional variation in species or sub-species is taken into account.

That we have a reasonable timeframe to work towards requirements of the plan in an economically and socially sustainable way. I have concerns over expectations to enhance or restore SNAs or areas around them and the cost of doing so.

The Government seems to be loading a huge cost onto Local Government and landowners with little assistance.

We have deferred subdivisional fencing due to operational constraints and any requirements to fence biodiversity and fence/plant waterways to meet clean water requirements could easily bankrupt me, if required to be complete in the next 10 – 15 years.

Overall response.

I support the objectives of this NPSIB but believe certain amendments are vital.

I strongly support the objective of local authorities recognising, and providing, for Hutia Te Rito which recognises the relationships between indigenous biodiversity and people/communities and that conservation requires kaitiakitanga and guardianship.

The NPSIB needs to recognise and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks.

Replacing the term “stewardship” with “custodianship” or “guardianship” 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.

### Section 3.7

Pastoral farming and biodiversity are not mutually exclusive and the importance of the guardianship farmers and other landowners provide the livestock and biodiversity on their land needs to be recognised.

Local knowledge and a sense of community involvement is vital to protection and planting programme success. Community started projects are far more successful than projects undertaken to comply with regulation.

Farmers need land use options for farmers to deal with severe weather events and help ensure their businesses are resilient to be able to support the protection of biodiversity.

Should be strengthened and in line with Farm Environmental Plans from Regional Councils.

### Section 3.8

Councils need to keep an eye on the budget. It is well and good to develop SNAs but who is paying for it and ongoing maintenance costs?

Councils need decent timeframe to complete assessment work. Ground proofing is a time consuming task and the different councils are going to be competing for people qualified to undertake the task properly.

All areas identified as SNAs need to be assessed and verified by a Terrestrial Ecologist.

Need thresholds so 1 or 2 plants outside their normal range does not trigger requirements to protect, if species common elsewhere.

If habitat that is identified as “threatened” it is only included if it is 0.25ha or greater and contiguous.

Habitat that is identified as “rare” if only included if it is 0.5ha or greater and contiguous.

Habitat that is identified as “at risk” is only included if it is 1ha or greater and contiguous.

### Section 3.9

Replace “avoid” with “manage” or “mitigate”. Avoid is a very rigid term and will prohibit changes in use in a number of areas.

Concerned areas of farm land could be bought and planted to offset clearing areas closer to towns where subdivision is more profitable. This should not be allowed.

### Section 3.12

Delete restrictions on the ability to undertake an existing activity in areas which have become SNA's.

I am concerned about the

NPSIB should 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;
- Vegetation clearance;
- Pruning trees to grow on for firewood.

Where consents are required, then the effects of an activity should be assessed in relation to the attributes which underpin the significance of the habitat such as representativeness, rarity, and distinctiveness.

### Section 3.13

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. This could result in significant areas of my farm being impacted which ultimately would significantly impact my farm viability and resilience.

Should be amended to ensure that existing activities as outlined under 3.12 are provided for.

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.

Prioritise engagement with the technical expert and landowner to 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.

I am concerned that catchment wide regulations may be introduced rather than targeted areas within a catchment as a way to reduce costs. We are in the catchment area for the Kaipara Harbour which covers some 164,000 ha.

#### Section 3.15

“Likely to be sometimes present” is far too broad. Should be left to the local councils to liaise with landowners rather than tying things up with more red tape through regulation and for rare species proof should be needed before any restrictions on land use are triggered.

We are roughly half way between East and West coasts and occasionally get visits from seagulls when there are storms at sea or coastline. We should not have to provide for them.

#### Section 3.17

Any increase should be linked to carbon sequestration and clean water regulations and the Billion Trees Scheme.

I am concerned at the amount of land that is being planted in forestry, especially pine, and the amount of farmland that would be caught up in increasing vegetation cover.

Any enquiries can be sent to me by email. [REDACTED]

Yours faithfully

[REDACTED]