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
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Submission

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

Background about our farm & our personal response to the Biodiversity proposals:

We are passionate dedicated high country farmers, farming sheep, beef cattle & deer in an extensive system. In our late 50’s now, we both grew up on farms, in strong supportive farming communities which New Zealand is known for, & proudly so.

We started farming in our own right in 1988 on a Council leasehold block, and over the years bought/sold neighbouring blocks until we’d got ourselves in a position to be able in 2001 to purchase our dream farm, an extensive high country freehold run, Four Peaks Station. We did this without family monies, without government assistance, but with totally hard work, good farm management practices & determination. We also now own & manage my father’s property, Waimarie, near Geraldine. Together both properties run Stock units of sheep, cattle, & deer.

To help make Four Peaks Station viable in 2006 we set up a private walking track, where guests walk or mountain bike around the Station over 4 days, staying in upgraded shepherd’s huts. We now have approx. people through over the summer & they all
enjoy seeing 1st hand the natural untouched flora & fauna of the high country.
www.walkfourpeaks.co.nz

We are always spraying gorse, broom & Spanish Heath weeds as & when we see them. As
part of our Farm working expenses we spend an average on weed control annually.

We farm conservatively & conscientiously, we value & appreciate the high country, we even
control any weeds we see in the neighbouring DOC block. So we strongly object to having
the government try to control or upset our current good farm management practices. This is
freehold land, we have taken the risk to borrow the millions to purchase it, we farm with very
sound management practices, and please note… we are one of many good farming
businesses who supply the 61% of earnings for the country from agricultural food-based
exports.

We have over hectares of lovely native bush blocks on the farms, most have been
designated as SNA’s by of the Timaru District Council. We object to plans to
fence all these bush areas/creeks/waterways on our type of country to exclude stock from
them. Stock only access the bush if the area is over-stocked, or the waterways to have a
drink, the same as rabbits, possums, birds, and beetles do. Occasionally they will defecate
in the water, but as we all know these impurities disappear within a few metres in fresh water
running over rocks and gravel, as well as being a food source for other creatures living in the
waterways (eels, cockabullies, insect larvae etc). The natural biodiversity & ecosystems are
already there, we just need to have common sense (as the large majority farmers on the
land have) & continue to look after them as we’ve always done.

Imposing rules & regulations won’t improve anything – it’ll make the country’s hard working
farmers go-broke, how will that help? We don’t need the proposed heavy handed, one size
fits all regulation – but should use a practical, sensible and affordable approach and listen to
experienced, pragmatic and committed farmers providing the right community based
solutions.

Apart from being too costly to implement, fencing all areas of bush & waterways won’t stop
pests accessing them. Our costs trying to keep pests at low levels is increasing every year,
while the Geraldine forest is being milled this year pig & wallaby numbers have exploded on
adjacent farmland – there have been over pigs, wallabies, about deer, & possums shot or trapped on our place alone, and at our cost. How would fencing
bush areas or creeks stop them accessing the bush or drinking water, or spreading TB?
And who will pay the Fart tax on pests? And what actions or responsibility are all the
Forestry owners taking to look after their native bush areas? (there are many Government
owned forestry blocks). How much of it has been removed to plant exotic trees? Wilding
pines are becoming a major problem near these forests.

The Tenure review blocks that the Government initiated are now just breeding grounds for
wild animals & noxious weeds, (Spanish Heath, broom, gorse, wilding pines in our area
especially). It seems to us that Doc are now wasting tax-payers money by flying around their
newly acquired blocks in helicopters, shooting the increasing tahr, deer etc. & spending less
& less on weed control. These blocks are actually a fire hazard waiting to happen now that
they’re no longer grazed/farmed.

We hope someone actually reads & takes note of our comments & those of other hard-
working, successful farming people. As a country we need us to do what we do, we all
have limits & boundaries & rules that we follow and are happy to follow, but when they
become ludicrous, time-wasting & costly…. we’ll lose that point of difference New Zealand
as a nation has in the eyes of the world, of people who think outside the square & make a
difference, we'll become peasant farmers in an over-regulated society where the only people making a decent living are the regulators.

Why am I making this submission?

I am making this submission because I'm concerned that the people in government, sitting behind desks, & have probably never been on a farm or understand farming, are making costly, onerous & erroneous statements & rules, without sound scientific backing, that will detrimentally affect our country’s most profitable export (& local) industry.

Section A: General responses to the proposals:

- 30% of New Zealand is owned by the Crown (Doc estate) so we support the overall goal of the proposals that recognise the value of indigenous biodiversity to New Zealand, its people, and communities, and to ensure that Indigenous Biodiversity in this Doc Estate, is protected, and where it has been significantly lost is restored.

- 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. A total of 24% of New Zealand’s total indigenous habitats occurs on the 8.8 million hectares covered by sheep and beef farms, with over 47% of QEII covenants being on sheep and beef farms. The area of indigenous habitats formally protected by QEII, Ngā Whenua Rāhui, and other covenants is growing.

- We 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 and Kaitiaki to these habitats and species.

- However, we 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. We 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. We have several areas of native bush on both properties & have no intention of ever removing these. Some are fenced off, some are impossible to fence, but our stocking rate is low enough that these areas continue to thrive, as they have done by my father before me, & others before him, since farming began in NZ.

- 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.
Section B: Impacts and implementation:

- We are deeply concerned about the potential impacts of these proposals on our farm in relation to areas being identified as Significant Natural Areas (SNAs), areas identified as being important for the protection of SNAs which may include land adjacent to SNAs, and the identification of highly mobile species, in relation to the impacts this may have on our 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.

- We are concerned that New Zealand does not currently have the extent of technical expertise available to assist regional and district councils to identify SNAs 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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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 custodianship.
- 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 “custodianship” 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)

- 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
- 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
<table>
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<th>3.8 Identifying Significant Natural Areas:</th>
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<td>(Discussion document page 31)</td>
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- 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

rules reflect Objective 3.7 including prioritising non regulatory approaches and partnerships over regulatory frameworks, and the establishment of conservation 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.
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<tr>
<th>3.9 Managing adverse effects on SNA’s (Discussion document page 42)</th>
<th>I support with amendments.</th>
<th>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.</th>
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<td>I support requirements to manage new activities that effect significant natural areas.</td>
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• Amend 3.9 so that the provision relates to consent applications and the assessment of effects, and 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.

• 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.

Use these prompts to help you personalise your submission

• Are you considering new activities in areas adjacent to SNAs?
• How would the proposals affect this? In particular, how would you manage changes around weather such as drought, flooding; climate change adaptation; other pressures such as market; or other environmental issues such as water quality.

3.12 Existing activities in SNAs
(Discussion document, page 49)

• I oppose the current proposal, but put forward the proposed changes.

• I support the intention of providing for existing activities but am concerned that 3.12 as proposed does not do this.

• 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:
  o grazing of productive animals;
  o Pasture renewal;
  o Cultivation;
  o Vegetation clearance.

• 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, vegetation clearance, cultivation, or pastoral renewal, that may occur within a 7-year rotational basis, along with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods.

- 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 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.

| 3.13 General rules applying outside SNA’s: | I support the intention of recognising areas around SNA’s as important for protecting SNA’s themselves and their values. | I seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for. I am concerned that 3.13 as proposed may result in areas of my |
**3.15 Highly Mobile Fauna:**

<table>
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<th>(Discussion document, page 38)</th>
<th>• I support with amendments.</th>
<th>• 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.</th>
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<td>• 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.</td>
<td>• I seek that 3.15 is amended to prioritise engagement with the technical expert and landowner to co-design management systems.</td>
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</table>
• 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.

 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

• Add any final or summarising comments.

• Thank you again for the opportunity to comment on the proposed changes. We welcome the opportunity to further discuss any of the points above with the Ministry for the Environment and the Department of Conservation, should you wish for more information.

Yours faithfully,