

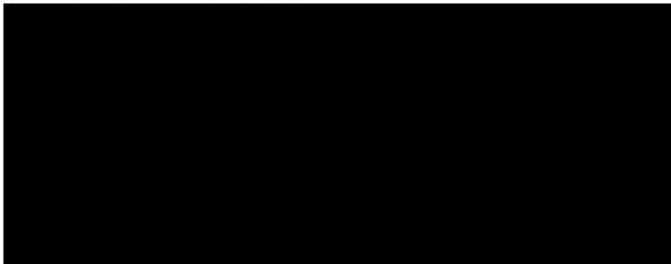
## **DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

Submission on the publicly notified draft National Policy Statement for Indigenous Biodiversity.

**On:** Ministry for the Environment – draft National Policy Statement for Indigenous Biodiversity.

**To:** Ministry for the Environment

### **Personal Information**



## Submission

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

[REDACTED] with their [REDACTED] children, aged 6 to 10 years, farm a dry land rolling to hilly property with bushy gullies on the coast of North Canterbury. [REDACTED] has been farming the property for 19 years.

We are third generation farmers, with the farm originally taken up by my Grandfather as a returned soldiers ballot after WW2. The farm has been broken in over the years, clearing scrub off the flat and rolling country. We farm sheep and beef on about [REDACTED] hectares of pasture. The farm has another [REDACTED] hectares of mixed indigenous bush and scrub that was considered too steep to clear or left because we considered it was worth saving. The saved bush includes giant totara, matai and kahikatea (with one tree aged over 900 years old). We have QE11 covenanted about 48 hectares over the last 16 years. We want to continue to develop the farm by improving soil fertility, legumes and grass species in pastures, controlling scrub regrowth, more subdivision fencing and fencing off more native bush from stock grazing. We have recently experienced a severe 2 year drought and are currently in another very dry spell. This has lowered farm revenue and forced all discretionary spending to be cut. This includes fencing native bush for stock exclusion.

We are making a submission because the NPS for Indigenous Biodiversity will effect the way we farm on our property. We recognise the bush we have is special and worth protecting.

### Section A: General responses to the proposals:

We support the overall goal of the proposals to recognise the value of indigenous biodiversity on our farm.

We consider it important to have landowner support to achieve the goals of the NPSIB, and also future national conservation initiatives including Predator Free 2050.

The Indigenous bush should be considered as an asset to the farming business and not as a liability.

There are costs associated with properly protecting indigenous bush, new fencing, fence maintenance, weed and pest control and the opportunity cost of retiring the land from farming. We are looking at more QE11 covenants but are ruling this out at present as this could place to many future limitations on the bush (in the future we may want to sustainably harvest indigenous vegetation for some commercial use).

We feel on this farm as we are being financially penalised for not clearing native bush in the past as we can no longer utilise this land as exotic forestry plantations for timber and carbon credits. And now this area is being put into SNA we are being penalised by grandparenting rules.

### Section B: Impacts and implementation:

To properly protect the indigenous biodiversity on this farm livestock need to be excluded, and weed and pest control needs to be carried out regularly to remove exotic threats. We would be looking at a cost of [REDACTED] to [REDACTED] to fence off bush parts of the farm, which we can not afford to do. As

well we will lose areas of pasture due to sighting of fence lines to make fencing practical. Weed and pest control and fence maintenance are on going costs.

Specific Provision in the Proposed Plan	Submission	Decision sought
<i>The specific provisions my submission relates to are:</i>	<i>My submission is that:</i>	<i>The decision I would like MfE and DoC to make is:</i>
<p><b>3.7 Social, economic and cultural wellbeing:</b></p>	<ul style="list-style-type: none"> <li>I support the recognition that we and other farmers live on the land and are critical to conservation actions and the protection and enhancement of indigenous biodiversity. We are the guardians of the these special areas of indigenous vegetation and taxa on our farms.</li> </ul>	
<p><b>3.8 Identifying Significant Natural Areas:</b> (Discussion document page 31)</p>	<p>I support with amendments To get farmers support on SNA they need to be reconsidered as an income generating asset.</p> <p>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 should be undertaken in a consistent manner, with the significance of habitats verified or refined through an on the ground assessment, rather than just through reliance on spatial maps.</p> <p>An SNA needs to be recognised as a green house gass/carbon lockup. The value of this carbon sink needs to be fully recognised as a superior source of carbon lock up, due to its complex indigenous biodiversity.</p>	<p>SNA need to be included in the ETS scheme with income payments. These payments need to be of a level to encourage farmer support of SNA.</p>

<p><b>3.12 Existing activities in SNA's</b></p>	<p>I oppose the current proposal, but put forward the proposed changes.</p> <p>I support the intention of providing for existing activities but am concerned that 3.12 as proposed does not do this.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>○ grazing of productive animals on areas of pasture</li> <li>○ Pasture renewal;</li> <li>○ The period clearance of native invasive vegetation that has spread into pasture.</li> </ul> <p>The existing farming practises of maintaining pasture land does involve indigenous vegetation clearance.</p>
<p><b>3.13 General rules applying outside SNA's:</b></p>	<p>I support the intention of recognising areas around SNA's as important for protecting SNA's themselves and their values.</p>	<p>I seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for.</p> <p>As potential areas of SNA are scattered all around my farm I am concerned that 3.13 as proposed may result in large areas of productive pastoral farm land around my SNA's being 'locked up' from farming activities. This could result in significant areas of my farm being impacted which ultimately would significantly impact my farm viability and resilience.</p>

## CONCLUSION

- Famers are living on the land and we consider ourselves guardians of the environment. We want to leave the farm, both the livestock enterprise half and the indigenous fauna and and vegetation in a better state than when we took over management. We would like to give our children the opportunity to farm the land. Naming an area of indigenous biodiversity (IB) as an SNA will not protect it. A SNA needs to be identified by landowners and experts. Time, effect and capital needs to be spent to protect the IB for the ecosystem to be maintained and improved. SNAs need to be brought into the ETS. Existing farming systems must also remain financially viable. We will then have more resilient communities doing exceptional jobs looking after the special indigenous taxa and vegetation and achieve the goals of the NPSIB.

- Thank you again for the opportunity to comment on the proposed changes. I/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. For any inquiries relating to this feedback please contact [redacted] or [redacted] on [redacted] or [redacted]

Yours faithfully,

