From: Web@beeflambnz.com on behalf of no-reply@beeflambnz.com
To: Indigenousbiodiversity
Cc: tim@lsf.co.nz
Subject: [Tom Sturgess] Submission on the Draft National Policy Statement for Indigenous Biodiversity
Date: Friday, 13 March 2020 10:09:09 am

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Submitter's Information

- Name: Tom Sturgess
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- Address: 295 Trafalgar Street
- Region: Tasman
- Country: New Zealand

Background
Lone Star Farms is a sheep and beef cattle farming enterprise consisting of six properties in Tasman, Canterbury, Otago totalling approximately 16,000 ha. Collectively, these farms run 85-90,000 stock units on average throughout the year and employ 40 -50 staff.

General responses to the proposals:

- I 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 is both protected and restored.
- However, I 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. I 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.

Impacts and implementation:

- I am deeply concerned about the potential impacts of these proposals in relation to areas being identified as Significant Natural Areas (SNA's), areas identified as being important for the protection of SNA's which may include land adjacent to SNA's, and the identification of highly mobile species, in relation to the impacts this may have on my 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 on their farming businesses.

Specific responses
3.6 Precautionary approach:

- I oppose the requirement for councils to take a precautionary approach as this could result in protection of areas that are not necessarily significant due to lack of facts. This would lead to landowners being required to prove an activity would not have an effect on a habitat or a species.

3.7 Social, economic and cultural wellbeing:

- I support the recognition that the maintenance of indigenous biodiversity can occur while still providing for use and development.
- I support provisions which empower and support landowner and community conservation activities and local approaches.

3.8 Identifying Significant Natural Areas:

- I oppose this as it is currently written.
- I support the intent of 3.8 in identifying Indigenous Biodiversity which is significant. However, the criteria appears too broad and could capture any indigenous biodiversity irrespective of how common it is.
- I seek changes to provision 3.8 so that the significance criteria are narrowed so that only habitats or species which are endangered, or threatened, are identified.

3.9 Managing adverse effects on SNA's

- I oppose this as it is currently written.
- Amend 3.9 so that the requirements 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 can be avoided, or remedied, or mitigated.

3.12 Existing activities in SNA's

- I oppose this as it is currently written.
- While I support the intention of providing for existing activities, I am concerned that 3.12 as proposed does not do this. There is too much scope for excluding existing use rights due the inherent in frequencies that a farmer address land and farming challenges eg vegetation clearance, cultivation, or pastoral renewal, that may occur only periodically as needed, along with the pastoral grazing of livestock that also may be temporal in nature for example during drought periods

3.13 General rules applying outside SNA's:

- I oppose this as it is currently written.
- 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 farms around my SNA's being 'locked up' from pastoral based farming activities.

3.15 Highly Mobile Fauna:

- I oppose this as it is currently written.
- 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.