My brother [redacted] and I and our families have come from a farming background. We purchased the first [redacted] 17 years ago and the purchased [redacted] next door, [redacted] 7 years ago.

We have invested [redacted] in to the farming operation with the intention of show casing an environmentally sustainable and diverse enterprise that will be profitable with growing employment for the rural community. [redacted] is a large grower of strawberries in West Auckland.

I, [redacted], am involved in diverse businesses however we and our families share the vision and passion of environmentally sound management of hill country farming.

The farm is the gate way to the [redacted] to [redacted] To Nowhere and runs through our [redacted]. We have converted the [redacted] into a [redacted] for [redacted] to stay at on their first night before they begin the [redacted]. They then go on to the Whanganui River before taking a jet boat on to the next stage. We have involved my daughter [redacted] and son in law [redacted], along with [redacted], our [redacted] in our [redacted] for [redacted].

I mention all of these things as we are fine tuning how we operate the [redacted]. If we had restrictions put on us as to how we could use the land, we would not continue to achieve the best outcomes. An example of this is our observations of Manuka flowering and nectar production. The Manuka flowers strongly one year then is quiet the year following and young plants flower strongly one year more than older trees. Then this reverses the following year. By having young and old Manuka trees you maintain a more consistent nectar source for all insects. Very old Manuka have only half a metre of leaf and flower on the previous years regrowth. We have set aside many [redacted] of mature native bush. We have planted and fenced [redacted] of land for high end Manuka trees. We invest in fencing, fertiliser, track maintenance along with controlling invasion of fern and Manuka plants into the rest of the farm. We look to balance this regrowth and to have
on our steep slopes and scattered through the farm land. This is for shelter and maximising flower and nectar flow as tightly grown Manuka kills most of the vegetation.

We are very concerned about the potential impacts of these proposals on our farm in areas which have been identified as Significant Natural Areas. This may include adjacent SNA’s ie our boundary of 16km with Whangamui National Park, Department of Conservation. You would identify a lot of native bird species on our farm that we have successfully protected from rodent and possum by working with DOC and Horizons Regional Council. The provisions could be interpreted as precluding the ongoing grazing of animals adjacent to and within these areas, which means we would be penalised for our conservation efforts and shoulder the greatest costs including restrictions to our farming business.

The compliance costs of various proposals are likely to be significant including deer fencing to manage the wild population of deer and ongoing pest management including vegetation. These costs could fall to us as already I have received an email from Horizons Regional Council saying they will be reducing subsidies on fencing next financial year form 50% to 30% for fencing - this did not include work to prepare the ground for priorer tofencing.

Further concern is the carbon credits that rightfully should be given to the farmer are not mentioned and no financial redress addressed in this proposed legislation. We are looking to replace regenerating Manuka with planted high UMF Manuka, as encouraged by the government. We will gain carbon credits and Manuka honey revenue.

I am concerned that the local authority does not have the expertise and money to identify the SNA’s and mobile species across their territorial areas, all to be completed in five years.

Why am I making this submission? Because our are passionate about sustainable farming and preserving this land for the generations to come. If you view our website you can see we walk the talk. We have grown the business to have two families employed in managing the day to day running of the farm. We have going through the farm on the which is the popular in New Zealand.

Why put restrictions and penalties on people already doing the job that this legislation set out to achieve?

We support the overall provisions which recognise that conservation actions to be enduring require land owner, community support and leadership. Policies need to recognise that people are critical to maintain and enhance biodiversity and landowners as custodians of these habitats and species.

We do however oppose the provision which seeks to 'lock up indigenous biodiversity' which by doing so will 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 use and activities and which recognises these can coexist for mutual benefit.

We consider the indigenous biodiversity as an asset to our farming business and community, it should not be a liability. There needs to be changes to the NPSIB to remove words like control and replace them with management and mitigation where it gives flexibility back to the land owner. A strong regulatory stick approach to the recognition and ongoing management of indigenous biodiversity could, if not carefully constructed, undermine existing and future conservation efforts and viability of farming and
employment in these rural areas.

General comments:

- New Zealand's sheep and beef farmers have retained 2.7 million hectares of indigenous habitat within their farms which is testament to the value farmers place on indigenous biodiversity. As much as 24% of New Zealand's total indigenous habitats occur 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, Nga Whenua Rahui, and other covenants is growing.
- Indigenous biodiversity should be considered as an asset to the farming business, and communities, and not as a liability. 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.

**Hutia Te Rito:**

- 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 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.
- I support provisions which recognise and empower ground up, landowner, and community led conservation actions, and which prioritise non regulatory over regulation management frameworks.

**3.7 Social, economic and cultural wellbeing:**

- Support with amendments.
- 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 critical to conservation actions and the protection and enhancement of indigenous biodiversity.
- I support provisions which empower and support landowner and community conservation activities and local approaches.
- 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 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.

**3.8 Identifying Significant Natural Areas:**
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 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. Management frameworks can then be tailored to the level of risk that the habitat faces and the values that underpin the habitats significance.

Amend provision 3.8 so that a habitat that is identified as "threatened" is only included if it is 0.25ha or greater and contiguous.

Amend provision 3.8 so that a habitat that is identified as "rare" if only included if it is 0.5ha or greater and contiguous.

Amend provision 3.8 so that a habitat that is identified as "at risk" is only included if it is 1ha or greater and contiguous.

Exceptions can be provided for but should be specified in the regional or district plan.

I seek any consequential amendments to ensure provisions are aligned in identifying and then establishing management frameworks specific to the risk status of the habitat e.g. "rare", "threatened", or "at risk".

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.

I oppose the requirements on local authorities that the assessments have to be completed within 5 years. This is because it is unlikely that the technical expertise is available within New Zealand to be able to undertake the assessments appropriately including through on the ground verification of the significance of habitats, in partnership with landowners.

I seek that provision 3.8 is amended to enable local authorities the time to undertake this work in a robust manner. The ability for experts to work with landowners in identifying these habitats and in informing the ongoing management of these habitats within pastoral based land uses and activities, is an essential element to providing successful and enduring conservation outcomes.

3.9 Managing adverse effects on SNA's

Support with amendments.

I support requirements to manage new activities that affect significant natural areas.

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.

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 on the values that underpin the habitats significance (such as representativeness, rarity, and distinctiveness) can be avoided, or 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.
3.12 Existing activities in SNA's

- Oppose.
- 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:
  - Grazing of productive animals;
  - Pasture renewal;
  - Cultivation;
  - 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 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.
- I seek that 3.13 is amended to 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.
- I seek that 3.13 is amended to 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.

3.15 Highly Mobile Fauna:

- Support with amendments.
- 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.
- 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.

- 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.
- I seek that 3.15 is amended to prioritise engagement with the technical expert and landowner to co design management 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.

I am more than happy to discuss my submission or attend in person in front of a panel if required.

Yours sincerely

Other comments: