



GRAYMONT

Proposed National Policy Statement for Indigenous Biodiversity

To: Biodiversity Team
Ministry for the Environment
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Submission on: He Kura Koiora i hokia - Discussion Document on a proposed National Policy Statement for Indigenous Biodiversity (hereafter referred to as 'the Discussion Document'); and
Proposed National Policy Statement for Indigenous Biodiversity (hereafter referred to as 'the pNPS IB')

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1.0 INTRODUCTION

Graymont (NZ) Limited (hereafter referred to as 'Graymont' or 'the Company') would like to thank the Ministry for the Environment for the opportunity to present submissions to the pNPS IB and associated Discussion Document.

Graymont is wholly owned subsidiary of Graymont Limited, a global leader in the manufacture and supply of lime and limestone products. The Company currently operates four plants across New Zealand, and supplies quality lime and limestone products to Agricultural, Animal Health, Construction, Water Treatment, Environmental and Industrial markets of New Zealand and the Asia Pacific regions.

The Company's plant across New Zealand consists of:

Oparure Quarry

Presently Graymont owns and mines the country's largest single limestone quarry at Oparure, just north of Te Kuiti. This quarry produces high-grade limestone for use as agricultural lime, kiln feed stock, aggregates and pulverised limestone products.

Otorohanga

At Otorohanga, 20km north of the Oparure quarry, the Company operates two rotary lime kilns. This plant manufactures quicklime and hydrated lime products which are supplied to domestic and export customers across the South Pacific. At the Otorohanga site Graymont has specialised teams such as laboratory staff and associated facilities. The Company also has engineering and maintenance teams, who work to consciously maintain, manage and improve its operations.

Te Kuiti

Supplied with limestone from Oparure, the Te Kuiti site operates a vertical gas fired Maerz Kiln to produce quicklime.

Makareao Plant and Quarry

The Makareao plant and quarry is based in the South Island and located in North Otago. The quarry produces pure limestone of between 96-99 percent calcium carbonate and has its own rotary kiln, to produce exceptionally high-quality quicklime. Hydrated lime, aggregates and pulverised limestone products are also produced at the site.

Graymont's products have proven essential for mitigating a multitude of natural and man-made environmental impacts, while at the same time remaining indispensable for vital industrial processes. Consistency of supply of quality product is critical to a number of Graymont's customers and, as a company, Graymont places great importance on its ability to manage production and logistics to accommodate its customer's requirements in an environmentally aware and sustainable manner.

Graymont both prides itself on, and is committed to, operating in a sustainable manner. As a Company, Graymont is proud that its products are part of the solution in terms of addressing many of today's environmental challenges. Indeed, Graymont aims to consistently meet or exceed its regulatory and resource consent or permit obligations, while working to minimise the environmental impact of its operations. To fulfil its commitment, Graymont integrates environmental accountability into its strategic planning and takes a systems approach to its practices with respect to environmental impacts, carefully monitoring, environmental compliance and conducting a regular comprehensive audit programme, which includes both internal and external auditing being undertaken. Given this, Graymont recognises the importance of protecting significant indigenous diversity and also the need for a consistent approach to be provided throughout the country in order to achieve appropriate environmental outcomes.

This submission is made to the documents titled "*He Kura Koiora i hokia Discussion Document on a proposed National Policy Statement for Indigenous Biodiversity*" (hereafter referred to as '**the Discussion Document**') and "*Draft National Policy Statement for Indigenous Biodiversity*" (which Graymont notes is referred to in the Discussion Document and on the Ministry for the Environment's website as the proposed National Policy Statement for Indigenous Biodiversity and is hereafter referred to in this submission as '**the pNPS IB**').

Graymont records that it wishes to be involved with all (currently draft, proposed and future) regulatory reform and guidance material related to indigenous biodiversity matters and amendments to the same.

2.0 STRUCTURE OF SUBMISSION

This submission includes both of the following sections, and these should be read in combination:

- **Section 4**, which provides submissions on overarching issues that Graymont has identified in reviewing the pNPS IB and associated information; and
- **Section 5**, which provides submissions on specific provisions of the pNPS IB.

3.0 POST SUBMISSION MEETING

Graymont would be happy to meet with the Ministry for the Environment and government officials to discuss and elaborate on the points raised within this submission, or to respond to any questions or queries that officials might have with respect to the same. Please do not hesitate to contact Mr. Benjamin Murray to arrange such a meeting.

4.0 SUBMISSIONS ON OVERARCHING ISSUES WITH THE pNPS IB

4.1 Support for Central Government Direction on the Protection of Indigenous Biodiversity

Graymont agrees that there is a need to protect significant indigenous biodiversity, and that clear direction at a national level is required, in this regard.

Graymont is aware that while many councils and landowners have attempted to provide protection for indigenous biodiversity in past years, a number of key flaws in previous approaches have been experienced and, in many instances, these have directly worked against the biodiversity outcomes that were being sought and have served to frustrate relationships between councils, iwi, landowners and the wider community.

Graymont considers that it is critical that learnings from past attempts to protect indigenous biodiversity are taken into account, and that 'mistakes' are not repeated.

Key matters that have, in Graymont's experience, worked against protection of indigenous biodiversity in the past include:

- a) Lack of landowner and community involvement from the outset and throughout the process;
- b) Short timeframes that have put pressure on decision makers, leading to unjustified 'protection' of some areas, and unwanted behaviours in terms of biodiversity management on the ground;
- c) Unclear, impractical and/or disjointed regulation at both the central and local level; and
- d) Regulation that takes a defensive rather than a positive approach to biodiversity management.

Graymont considers that the pNPS IB, in its current state, does not address these past mistakes and therefore the Company does not support adoption of the pNPS IB as it currently drafted. We have made some suggestions to improve the outcomes of the pNPS IB within the subsequent sections.

Sections 4.2 to 4.5 refer to each of the matters set out in a) to d) above.

4.2 Landowner and Community Involvement

Graymont understands that a large portion of New Zealand's significant natural areas ('SNAs') and indigenous biodiversity lie on private land. As such, the Company believes that it is essential that landowners and the community are directly and fully involved in the identification and management of SNAs. Graymont considers that many attempts to protect SNAs in the past have failed because the identification of SNAs, and the imposition of regulations, has been carried out in the absence of landowner involvement.

Graymont believes that most landowners embrace the role of kaitiaki and stewardship, and have a good knowledge of the species present, and changes in flora and fauna populations over time on and around their properties. Graymont considers that this ethic and knowledge should be seen by both local and central government as an asset that can add to successful management of indigenous biodiversity. Further to this, landowners need to understand and support regulatory requirements for them to work, and for the desired indigenous biodiversity outcomes to be achieved.

Graymont is aware that past attempts at local government protection of SNAs have created perverse outcomes such as quick clearance of indigenous vegetation prior to regulations being enforceable, key areas of indigenous vegetation remaining unprotected, landowners walking away from self-funded pest management of indigenous vegetation on their properties, and unnecessary compliance costs for landowners that dilute their commitment to active guardianship.

Graymont considers that for indigenous biodiversity to be maintained, or enhanced where needed, it is fundamental that central and local government "must" put people first. It is the landowners and community that will be the day to day kaitiaki for the environment, and they must be empowered to take on this role and not feel stifled by unnecessarily constraining or unclear regulation.

Relief Sought

1. Based on the preceding comments, Graymont seeks that the pNPS IB is amended to ensure that landowners and the community are encouraged to be fully involved in the ongoing identification and management of SNAs and indigenous biological diversity. Specific relief sought in this respect is outlined in Section 5 of this submission (the table that follows).

4.3 Regulatory Timeframes

Graymont is aware that previous regulated tight timeframes, or unregulated council targets, have led to less than ideal processes for identification and management of SNAs and indigenous biological diversity. Tight timeframes, combined with a lack of technical expertise, have prevented sound landowner and community involvement in such processes, and have led to the adoption of poor technical advice and desktop processes that have wrongly identified (or missed) SNAs. When considered together, these limitations have resulted in overly restrictive regulation, or gaps in regulation, that have often prevented sound management of indigenous biodiversity rather than advanced it.

Regulated timeframes must factor in the availability of the necessary technical expertise across the country, and the opportunity for landowner and community engagement and involvement. Without these, the quality of local planning to maintain (or enhance) indigenous biological diversity will be significantly compromised.

Graymont has been advised that there is insufficient expertise within New Zealand currently to enable each of the councils to develop the necessary local plan changes within the timeframes set in the pNPS IB. The Company considers that this will encourage adoption of compromised processes in the identification of SNA's and the development of plan changes. In turn, this will likely repeat the flaws of past attempts to regulate the management of SNAs.

Relief Sought

2. Based on the preceding comments, Graymont seeks that the timeframes within the pNPS IB be amended, where it is shown to be necessary to fully account for the availability of technical expertise, and to allow for fulsome landowner and community involvement in the ongoing identification and management of SNAs and indigenous biological diversity. In this regard, Graymont seeks adoption of a clause similar to Policy E1 in the National Policy Statement for Freshwater Management. Specific relief sought in this regard is outlined in Section 5 of this submission.

4.4 Clear and Workable Regulation

While Graymont supports the intent behind many of the provisions within the pNPS IB, the Company considers that there is a large amount of duplication, disjointedness, and lack of clarity that leaves the pNPS IB open to significant challenge in council planning processes (and the Environment Court), and will likely work against the achievement of the intended maintenance (or advancement) of indigenous biological diversity.

For example, Graymont considers that the relationship between clause 1.7(4) (that is the "*Fundamental concepts*", "*Adverse effects on indigenous biodiversity*"), the definition of the "*effects management hierarchy*" in clause 1.8, clause 3.9 "*Managing adverse effects on SNAs*", and Appendix 2 "*Tools for managing effects on significant natural areas*" is unclear. When read together, Graymont believes that they form a particularly restrictive regime which will likely prevent any activity, of any nature or scale, within an SNA. In Graymont's view, the combined effects of these provisions will prevent the ability to undertake weed control in an SNA, prevent access to an SNA and thereby the community's understanding and connections with indigenous flora and fauna, and prevent maintenance (including for safety purposes) of significant industry and infrastructure such as power generation plants, amongst other activities of any form. Further to this, the lack of clarity will likely result in lengthy planning and court processes for individual councils across the country as the interpretation of the relationship is teased out and established outside of the pNPS IB. This, in turn, will delay the advances in the maintenance (and as necessary, the

enhancement) of indigenous biodiversity being sought by the introduction of the pNPS IB.

Relief Sought

3. Based on the preceding comments, Graymont seeks the specific changes to the pNPS IB as set out in Section 5 of this submission document. Notwithstanding this, the Company seeks simplification of the pNPS IB provisions and greater clarity of how the separate provisions are to work together. Wherever possible, this should be addressed within the pNPS IB itself, and where not possible the insertion of guidance notes into the pNPS IB are sought.

4.5 Positive Regulation

Graymont is concerned that the pNPS IB takes a very constraining approach to the management of indigenous biodiversity. This can alienate people from wanting to be involved, and can create a sense of burden towards the presence of indigenous flora and fauna on properties. The Company considers that this will ultimately work against the outcomes sought by introducing the pNPS IB.

Further, Graymont seeks that the pNPS IB is re-worked to create regulation that encourages the involvement of landowners and the community in the identification, maintenance and enhancement of indigenous biodiversity in New Zealand. The Company is concerned that without significant re-work, the pNPS IB will result in the same (or similar) 'mistakes' and unintended consequences that New Zealand has experienced in the past with respect to the identification and management of indigenous biodiversity.

Relief Sought

4. Graymont seeks that the pNPS IB is re-worked so as to create regulation that encourages the involvement of landowners and the community in the identification, maintenance and enhancement of indigenous biodiversity in New Zealand.

[Section 5 of this submission follows on the next page.]

5.0 SUBMISSIONS ON SPECIFIC PROVISIONS

The following table sets out Graymont’s submissions on specific provisions of the pNPS IB. Note that the numbering of relief sought follows on from the relief sought in Section 4 of this submission (on the previous page).

Provisions	Submission	Relief Sought
1. PROVIDING FOR HUTIA TE RITO		
Subclause 1.7(1) Clause 2.1, objective 3 Clause 3.2 Subclause 3.3(1)(b)(ii)	<p>Graymont supports the inclusion of Hutia Te Rito as a fundamental concept that underpins the pNPS IB. The Company recognises the undeniable importance of the relationship between the health of people and the health of the environment. In this respect, the Company agrees that people are both part of, and dependent on, the natural environment and ecosystems; and as highlighted in section 1.0 of it’s submission, Graymont is committed to its role as kaitiaki of the natural environments associated with its plant and associated activities.</p> <p>The success of incorporating Hutia Te Rito into the pNPS IB, and local planning mechanisms, relies on clarity of its interpretation, particularly when it is adopted as an objective of the pNPS IB (objective 3), and made a matter that local authorities must recognise and provide for (as in Clause 3.2 of the pNPS IB).</p> <p>Graymont supports inclusion of an explanation of the concept (as provided in Clause 1.2 of the pNPS IB) and inclusion of minimum requirements of local authorities (as provided in subclause 3.2(2) and subclause 3.3(1)(b)(ii)). However, Graymont considers that further detail on the required application of the concept is needed within the pNPS IB, and outside the pNPS IB as support.</p>	<ol style="list-style-type: none"> 5. Retain inclusion of Hutia Te Rito as a fundamental concept that underpins the pNPS IB. 6. Retain an explanation of the concept of Hutia Te Rito as provided in subclause 1.7(1). 7. Retain minimum requirements for how local authorities are to recognise and provide for Hutia Te Rito. 8. Notwithstanding the preceding relief, amend subclause 3.2(2) to provide greater certainty for local authorities, and parties to planning processes, of what the pNPS IB requires to be undertaken and achieved by local authorities when recognising and providing for Hutia Te Rito. In particular, provide greater certainty to what is required by subclauses 3.2(2)(b) and 3.2(2)(c). 9. That robust guidance be developed and available to local authorities and other parties on the concept of Hutia Te Rito and how it should be applied in the maintenance or improvement of indigenous biodiversity.

Provisions	Submission	Relief Sought
	<p>For example, with respect to clause 3.2(2)(b) of the NPS IB it is not clear what is meant by requiring local authorities to recognise the role of kaitiakitanga and stewardship in the maintenance of indigenous biodiversity. It is not clear how a local authority would show, beyond challenge, that they have met this requirement. Further to this, where the required recognition may have been provided, it is not clear what the authority is then required to do in response to such recognition. The lack of clarity in this requirement leaves room for considerable challenge (and associated time and costs for parties) during local planning processes.</p> <p>With respect to subclause 3.2(2)(c) it is not clear what is intended by the requirement to “<i>takes steps</i>” or how a local authority would show, beyond challenge, that they have met this requirement.</p> <p>Graymont is aware that the inclusion of the concept of Te Mana o te Wai in the National Policy Statement for Freshwater Management (‘NPS FM’), while supported, has led to considerable time and cost in council and Environment Court hearings across the country as parties have held differing understandings of the concept and how it is required to be implemented by the NPS FM.</p> <p>Graymont understands that a current example of the challenges associated with interpreting the requirement of the NPS FM, with respect to Te Mana o te Wai, is the ongoing appeal hearings related to the proposed Southland Water and Land Plan.</p> <p>To minimise the potential for lengthy planning and court processes, the Company is seeking a greater degree of clarity in the pNPS IB on the requirements for implementation of Hutia Te Rito,</p>	

Provisions	Submission	Relief Sought
	<p>Further, while Graymont considers that it is important that the pNPS IB is clear in its own right, the Company also recognises the value in providing additional guidance material and case studies to illustrate good implementation of the concept of Hutia Te Rito. Accordingly, Graymont seeks central development of robust guidance material to support local authorities and other parties who are working to implement the concept of Hutia Te Rito in the maintenance or improvement of indigenous biodiversity.</p>	
<p>2. PROVIDING FOR THE PRINCIPLES OF THE TREATY OF WAITANGI</p>		
<p>Clause 2.1, objective 2 Clause 2.2, policy 1 Clause 3.3</p>	<p>Graymont supports objective 2, policy 1 and clause 3.3 of the pNPS IB as a means to provide councils with greater clarity on how to meet their obligations (established in the Resource Management Act) in relation to the Treaty of Waitangi when making decisions about indigenous biodiversity. With this, the Company supports early and meaningful collaboration and consultation with tangata whenua and the adoption of mātauranga Māori in the management of indigenous biodiversity.</p> <p>However, Graymont is concerned that there remain areas of uncertainty within clause 3.3. The terms "<i>as far as practicable</i>" and "<i>take all reasonable steps</i>" leave considerable room for differing expectations of what is practicable or reasonable. As these terms are adopted in a requirement that councils "<i>must</i>" meet, these terms create the potential for being challenged (and associated time and costs for parties being incurred) during the local planning processes. Given this, Graymont considers that it is crucial that guidance material and case studies are provided, to local authorities and other parties, to illustrate best practice when</p>	<p>10. That robust guidance be developed and available to local authorities and other parties to illustrate best practice when collaborating and consulting with tangata whenua, and incorporating mātauranga Māori, in implementing the pNPS IB.</p>

Provisions	Submission	Relief Sought
	collaborating and consulting with tangata whenua and when incorporating mātauranga Māori as required by the pNPS IB.	
3. THE ROLE OF LANDOWNERS, COMMUNITIES AND TANGATA WHENUA		
Clause 2, objective 6	<p>Graymont considers that objective 6 is incomplete. While its focus is on recognising the role of landowners, communities and tangata whenua as stewards and kaitiaki of indigenous biodiversity (which Graymont supports), the listed actions in the pNPS IB of the same objective do not include the role of these parties as stewards and kaitiaki. Rather the actions are limited to growing an understanding of “nature” and allowing people to provide for their wellbeing.</p> <p>As illustrated in other parts of Graymont’s submission, the Company considers that there needs to be a clearer and stronger focus provided throughout the pNPS IB to the value that landowners, as stewards and kaitiaki of indigenous biodiversity, offer to the identification and management of indigenous biodiversity. Landowners often hold the greatest awareness of what species are present, and how populations have changed over time. Landowners will also be the ones facing any constraints on activities as a result of managing for indigenous biodiversity outcomes. Therefore, Graymont considers that it is important that they are encouraged to be fully involved in the processes set out in the pNPS IB, including identifying sites of SNAs and methods for maintaining (or where necessary, enhancing) indigenous biological diversity.</p>	<p>11. Amend objective 6 as follows:</p> <p><i>“Objective 6: to recognise the role of landowners, communities and tangata whenua as stewards and kaitiaki of indigenous biodiversity by</i></p> <p><i><u>a) working with landowners, communities and tangata whenua in the identification and management of indigenous biodiversity; and</u></i></p> <p><i>b) allowing people and communities to provide for their social, economic and cultural wellbeing now and in the future; and</i></p> <p><i>c) supporting people and communities in their understanding of, and connection to, <u>nature indigenous biodiversity.</u>”</i></p>

Provisions	Submission	Relief Sought
4. SOCIAL, ECONOMIC AND CULTURAL WELLBEING		
<p>Clause 2, objective 6(b)</p> <p>Clause 3.7</p>	<p>Graymont supports the focus provided in objective 6(b) in terms of recognising the importance of people and communities being able to provide for their social, economic and cultural wellbeing. This sits at the heart of sustainable management, since good resource management (including the management of indigenous biodiversity values) relies on a healthy economy, and a healthy economy and community relies on a healthy environment. As previously discussed in this submission, Graymont considers that a failure to recognise this can lead to overly restrictive regulation which in turn can alienate people from wanting to be involved, and can create a sense of burden towards the presence of indigenous flora and fauna on properties. Graymont considers that both of these outcomes would work against successful management of indigenous biodiversity.</p> <p>In contrast to objective 6(b), clause 3.7(a) turns this relationship around and requires local authorities to recognise <i>“that the maintenance of indigenous biodiversity contributes to the social, economic and cultural wellbeing of people and communities”</i>.</p> <p>Further, while clause 3.7(b) appears to have a relationship to objective 6(b) by requiring local authorities to recognise <i>“that the maintenance of indigenous biodiversity does not preclude subdivision, use and development in appropriate places and forms, within appropriate limits”</i>, Graymont considers that this does not fulfil objective 6(b). Rather, the Company believes that as drafted, clause 3.7 is silent on (or dismisses) the importance of people and communities being able to provide for their social, economic and</p>	<p>12. Retain objective 6(b)</p> <p>13. Amend clause 3.7 as follows:</p> <p><i>“In implementing this National Policy Statement, local authorities must recognise</i></p> <p><i>a) that <u>people and communities need to be able to provide for their social, economic and cultural wellbeing now and in the future</u>the maintenance of indigenous biodiversity contributes to the social, economic and cultural wellbeing of people and communities; and</i></p> <p><i>b) that the maintenance of indigenous biodiversity does not preclude subdivision, use and development in appropriate places and forms, within appropriate limits; and</i></p> <p><i>c) that people are critical to maintaining and enhancing indigenous biodiversity; and</i></p> <p><i>d) the importance of forming partnerships between local authorities, tangata whenua, landowners, people and communities in maintaining and enhancing indigenous biodiversity; and</i></p> <p><i>e) the importance of respecting and fostering the contribution of landowners as stewards and kaitiaki; and</i></p>

Provisions	Submission	Relief Sought
	cultural wellbeing. Graymont considers this is a fundamental flaw of clause 3.7 of the pNPS IB.	f) <i>the value of supporting people and communities in understanding, connecting to and enjoying indigenous biodiversity.</i> "
5. IDENTIFYING AND MAPPING SIGNIFICANT NATURAL AREAS		
<p>Clause 2.2, policy 6</p> <p>Clause 3.8</p> <p>Appendix 1</p> <p>Appendix 2</p>	<p>Graymont supports adoption of a common set of criteria for identifying significant indigenous vegetation and significant habitat of indigenous fauna (Appendix 1) as this will improve consistency across local authority boundaries, and provide a clear and transparent process to work with communities and landowners. This will also provide greater certainty for resource users with respect to the location of SNAs and what activities can and cannot be undertaken within them. With this, and as previously discussed, Graymont notes the importance of working with landowners when identifying and protecting areas of significant indigenous vegetation or significant habitat of indigenous fauna.</p> <p>The Discussion Document states that the criteria set in Appendix 1 for "<i>identifying significant indigenous vegetation and significant habitat of indigenous fauna</i>" are not intended to capture all indigenous biodiversity in an area; rather they are intended to identify the significant vegetation and habitats that need protection and management so as to maintain indigenous biodiversity across New Zealand. Graymont supports this distinction and considers that this needs to be emphasised within the pNPS IB, for example through adoption of a guidance note.</p> <p>With respect to the timeframes set in clause 3.8, Graymont has been advised that for those councils that do not currently have SNAs</p>	<p>14. Amend policy 6 as follows:</p> <p><i>"to <u>work with landowners, communities and tangata whenua to identify and protect areas of significant indigenous vegetation or significant habitat of indigenous fauna by identifying and to manage managing them as SNAs</u>"</i></p> <p>15. Retain clause 3.8(1) and clause 3.8(2).</p> <p>16. Add the following after clause 3.8(2)"</p> <p><i>"<u>Guidance note: clause 3.8(1) and clause 3.8(2) apply to areas of significant indigenous vegetation and areas of significant indigenous fauna that have been identified using the criteria set out in Appendix 1, rather than all areas with biological diversity.</u>"</i></p> <p>17. Add new clause 5 as follows:</p> <p><i><u>a) This clause applies to the implementation of this national policy statement by a local authority.</u></i></p>

Provisions	Submission	Relief Sought
	<p>adequately addressed within their planning documents, the requirement to have identified SNAs within five years will be very challenging. For those councils that have already identified SNAs in a manner that is consistent with Appendix 1 of the pNPS IB, the requirement to have classified these areas as High or Medium (in accordance with Appendix 2) within five years will also be challenging. To achieve these requirements, Graymont understands that councils will need access to specialised expertise. Graymont considers that there is insufficient capacity of the necessary expertise available across the country to allow all councils to meet these timeframes. In addition to this, Graymont notes the importance of SNA identification and management decisions being informed by robust data. Such data takes time to be collected, analysed and applied in decision making. It is crucial that sufficient time is available to ensure decision making achieves the desired outcomes of the pNPS IB, while minimising the potential for unnecessary constraints on landowners.</p> <p>For the preceding reasons, Graymont considers that the timeframes set in clause 3.8(3) to clause 3.8(8), inclusive, are too short. The Company accepts that a fast pace is needed to improve indigenous biodiversity management, and that some councils will be able to robustly comply with the requirements of the pNPS IB, including the timeframes as set. However, Graymont understands that many councils will not be able to meet these timeframes without significant compromises in the process and quality of technical input, and ultimately the sound management of indigenous biodiversity. For this reason, Graymont seeks inclusion in the pNPS IB of a provision equivalent to Section E of the NPS FM which allows regional councils to extend the date by which they must implement the requirements of the NPS FM. Such a provision in the pNPS IB</p>	<p><u><i>b) A local authority may extend the dates in this national policy statement that apply to it if it considers that:</i></u></p> <p><u><i>i. meeting that date would result in lower quality planning; or</i></u></p> <p><u><i>ii. it would be impracticable for it to complete the required implementation by that date.</i></u></p> <p><u><i>c) any extension of a timeframe made under subclause b) must not be more than twice the timeframe for the same requirement as set elsewhere in this national policy statement.</i></u></p> <p><u><i>d) Where a local authority is satisfied that a date should be extended, it may implement the associated requirement by a programme of defined time-limited stages.</i></u></p> <p><u><i>e) Any programme of time-limited stages is to be formally adopted by the local authority by 31 December 2021 and to be publicly notified.</i></u></p> <p><u><i>f) Where a local authority has adopted a programme of staged implementation, it is to publicly report, every year, on the extent to which the programme has been implemented.</i></u></p>

Provisions	Submission	Relief Sought
	<p>would mean that if a council considered that meeting the dates in the pNPS IB would result in lower quality planning, or would be impracticable for the council to meet, then the council could extend the dates. The council would however be required to implement a programme of defined time-limited stages to meeting the requirements of the pNPS IB. This staged programme would need to be formally adopted by the council, publicly notified, and formally and publicly reported against each year.</p> <p>In addition to the preceding submissions, GRAYMONT considers that while it is territorial authorities that are required by these provisions to identify SNAs (rather than regional councils), regional councils can have useful monitoring data and scientific expertise that could be called upon in establishing the location and boundaries of SNAs. Graymont therefore encourages collaboration between the territorial authorities and regional councils.</p>	
6. RECOGNISING AND PROTECTING TAONGA SPECIES AND ECOSYSTEMS		
<p>Clause 2.2, policy 12 Clause 3.14</p>	<p>Graymont considers that the identification of taonga species and ecosystems, together with the establishment of measures to protect or manage the same, will lead to greater certainty for all. Without such certainty, costs and time involved in planning processes and consent applications can increase significantly, and taonga species and ecosystems can be exposed to the risk of damage. Graymont supports early and clear identification of taonga species and ecosystems.</p>	<p>Nil</p>

Provisions	Submission	Relief Sought
7. IDENTIFYING ADVERSE EFFECTS		
<p>Clause 1.7(4)</p>	<p>Graymont supports the inclusion of clause 1.7(4) which provides some guidance to the adverse effects that the pNPS IB is looking to address, however the adverse effects listed are of a highly general nature, and no indication of scale or thresholds is provided. As proposed, clause 1.7(4) provides a reference for what is meant when the other provisions of the pNPS IB refer to “<i>adverse effects on indigenous biodiversity</i>”. Given the general nature of the list, this creates significant uncertainty for regulators, landowners, the community and tangata whenua.</p> <p>Graymont considers that if such a list is to remain as a point of reference, then it needs further development and inclusion of indicative thresholds of the scale at which an adverse effect is to be managed by the pNPS IB. Without such thresholds, GRAYMONT believes that clause 1.7(4) is too encompassing.</p> <p>Graymont’s preference is that clause 1.7(4) be deleted and that it be re-cast as a guidance note.</p> <p>Further to the preceding submissions, Graymont re-emphasises the concerns it raised in submission point 4.4 of this document. That is, together clause 1.7(4), the definition of the “<i>effects management hierarchy</i>” in clause 1.8, clause 3.9 “<i>Managing adverse effects on SNAs</i>”, and Appendix 2 “<i>Tools for managing effects on significant natural areas</i>” form a particularly restrictive regime which will likely prevent any activity, of any nature or scale, within an SNA. Graymont understands that this is not the intention of the pNPS IB, particularly given objective 6(b)’s focus on allowing people and communities to provide for their social, economic and cultural wellbeing. The Company considers that deleting clause</p>	<p>18. Delete clause 1.7(4) and shift the content to a guidance note (GRAYMONT’s preferred relief); or</p> <p>19. If clause 1.7(4) is to remain within the pNPS IB, include associated thresholds for the scale of each adverse effect listed in clause 1.7(4).</p>

Provisions	Submission	Relief Sought
	1.7(4) (and shifting the content to a guidance note outside of the pNPS IB) would go some way to alleviating the unnecessarily restrictive requirements that result from the combination of clauses 1.7(4), 1.8 and 3,9, and Appendix 2.	
8. MANAGING ADVERSE EFFECTS ON BIODIVERSITY WITHIN SNAs		
<p>Clause .2, policy 6</p> <p>Clause 3.9</p> <p>Definition of 'effects management hierarchy'</p>	<p>Graymont is concerned with how potential effects of activities on SNAs are required to be managed. As proposed, clause 3.9 of the pNPS IB sets an absolute approach to managing adverse effects, based on the type of the effect rather than the scale of the effect. For example, clause 3.9(1)(a) effectively prevents any of the outcomes listed in clauses 3.9(1)(a)(i) to 3.9(1)(a)(iv) inclusive regardless of whether they can be shown to be of a less than minor scale.</p> <p>With respect to use of the "effects management hierarchy", it too can result in unnecessary costs to landowners as it requires that adverse effects, regardless of their scale, be avoided "where possible". Graymont considers that while it may be "possible" to avoid a less than minor adverse effect, the costs may outweigh the benefits and to adopt the word 'possible' may not result in the greatest benefit to the environment or the community. As proposed clause 3.9 and the definition of the "effects management hierarchy" would require such avoidance and associated costs. Graymont is concerned that as proposed, the pNPS IB could result in councils declining resource consent applications for activities regardless of whether the impact to indigenous biodiversity is less than minor, or where a better indigenous biodiversity outcome could be gained through offsetting or compensation. Graymont</p>	<p>20. Amend the definition of "effects management hierarchy" as follows:</p> <p><i>"means an approach to managing the adverse effects of subdivision, use and development, where the adverse effects are minor or greater, that requires that -</i></p> <p><i>a) adverse effects are avoided where <u>practicable possible</u>;</i></p> <p><i>b) adverse effects that cannot be demonstrably avoided are remedied where <u>practicable possible</u>;</i></p> <p><i>c) adverse effects that cannot be demonstrably remedied are mitigated;</i></p> <p><i>d) in relation to adverse effects that cannot be avoided, remedied or mitigated, biodiversity offsetting is considered; and</i></p> <p><i>e) if biodiversity offsetting is not demonstrably achievable for any indigenous biodiversity attribute on which there are residual adverse</i></p>

Provisions	Submission	Relief Sought
	<p>considers that it is more appropriate to require avoidance where it is practicable (rather than where it is possible), as this allows for some comparison between the scale of the effect being avoided and the costs associated with avoidance.</p>	<p><i>effects, biodiversity compensation is considered"</i></p>
<p>9. MANAGING ADVERSE EFFECTS ON BIODIVERSITY OUTSIDE SNAs</p>		
<p>Clause 2.2, policy 7 Clause 3.13</p>	<p>While Graymont supports, in principle, maintaining indigenous biodiversity in areas beyond SNAs (as well as within SNAs), the Company considers that areas outside of SNAs should not be addressed by such broad provisions within the pNPS IB. Rather, such matters should continue to be provided for under the existing provisions of the Resource Management Act and associated local plans, and the pNPS IB should focus on those areas of greater importance, that is SNAs. If Policy 7 and clause 3.13 remain in the pNPS IB, significant uncertainty for landowners will be ongoing, and efforts with respect to maintaining (and where appropriate, enhancing) SNAs may be diluted.</p> <p>If clause 3.13 is to remain in the pNPS IB, then Graymont is concerned that clause 3.13(1)(a) gives councils too much flexibility as to where, how and when they impose controls on indigenous biodiversity outside SNAs. While a flexible approach may well be considered useful for councils, it provides little certainty for resource users. For this reason, Graymont considers that if clause 3.13 is to remain in the pNPS IB, then clause 3.13(1) should be amended to require councils to work with landowners, to identify indigenous biodiversity values outside of SNA's, and when setting controls on activities related to such areas.</p>	<p>21. Delete Policy 7 and clause 3.13.</p> <p>22. If clause 3.13 is to remain in the pNPS IB, then amend clause 3.13(1) as follows:</p> <p><i>"(1) Local authorities must may take steps to maintain indigenous biodiversity outside SNAs, including by <u>working with landowners, communities and tangata whenua to make or change making or changing</u> their policy statements and plans to do all the following:</i></p> <p><i>a) specify where, how and when controls on subdivision, use and development in areas outside SNAs are necessary to maintain indigenous biodiversity:</i></p> <p><i>b) apply the effects management hierarchy to adverse effects, except that biodiversity compensation may be considered as an alternative to biodiversity offsetting (and not only when biodiversity offsetting is not demonstrably achievable):</i></p>

Provisions	Submission	Relief Sought
		<p><i>c) specify where, how and when, for any area outside an SNA, the assessment and classification required by clause 3.8(1) is required."</i></p>
<p>10. PROVIDING FOR EXISTING ACTIVITIES IN SNAs</p>		
<p>Clause 3.12</p>	<p>Graymont considers that explicit consideration needs to be provided within the pNPS IB to the ongoing functioning and maintenance of existing nationally and regionally significant activities. The requirements to manage the effects of such activities on SNAs should not prevent the activities from being undertaken.</p> <p>Graymont notes that clause 3.12(4) of the pSNPS IB identifies pastoral farming as an activity that needs specific and different consideration from other existing activities. The Company considers that there are other activities that may require specific consideration and management. For example, authorised quarry activities may have involved the clearance of indigenous vegetation in advance of extractive activities; while it is possible that indigenous vegetation may regenerate (even if simply an indigenous grass or herb) in the period between clearance and extraction. Graymont considers that such regeneration should not be subject to the provisions of the pNPS IB within the term of any associated resource consents.</p> <p>On this basis, Graymont is seeking the addition of similar provisions to the pNPS IB for quarrying as is provided for agriculture.</p>	<p>23. Add new clause 3.12(4A) as follows:</p> <p><i><u>"In regions and districts where quarry activities are an existing activity, local authorities must ensure that their policy statements and plans recognise that -</u></i></p> <p><i><u>a) indigenous vegetation may regenerate in areas that have previously been cleared of indigenous vegetation for the purposes of authorised establishment or maintenance of quarry activities; and</u></i></p> <p><i><u>b) the periodic clearance of indigenous vegetation as part of an authorised quarry activity should not be prevented; and</u></i></p> <p><i><u>c) consideration of effects (under Schedule 1 of the Act or through a resource consent application) may be required in the following circumstances:</u></i></p> <p><i><u>i) a proposed clearance is likely to have effects that are greater in character, intensity or scale than was considered under the authorisation held; or</u></i></p>

Provisions	Submission	Relief Sought
		<i>ii) a clearance is proposed in an area that supports any threatened or at-risk species."</i>
11. HIGHLY MOBILE FAUNA AREAS OUTSIDE SNAs		
<p>Clause 2.2, policy 13</p> <p>Clause 3.15</p>	<p>Graymont understands that policy 13 and clause 3.15 are intended to apply to highly mobile indigenous fauna, rather all highly mobile fauna, and therefore seeks that these provisions be amended to clearly reflect this.</p> <p>With respect to policy 13 and clause 3.15 (“Highly mobile fauna”) Graymont understands that these requirements sit outside the planning content and timeframe requirements that address SNAs (as set in clauses 3.8 and 3.9 of the pNPS IB). Graymont supports such an approach. While the identification and management of highly mobile indigenous fauna areas is considered important, the timeframes for such should be more lenient than for identification and management SNAs so that priority can be given to SNAs in the first instance. This recognises that many of the flora and fauna in SNAs will not be highly mobile and therefore will be less resilient to changes within SNAs. Further to this, Graymont agrees with the commentary in the Discussion Document with respect to current information available on highly mobile indigenous fauna being incomplete and that councils often do not have the necessary information to actively manage such fauna. Given the requirements of clause 3.8 and clause 3.9, Graymont considers that clause 3.15 will compound the limitations relating to access to sufficient expertise to source the necessary information. In response, Graymont considers that sufficient time is needed to accurately identify the habitat of highly mobile indigenous fauna prior to</p>	<p>24. Amend clause 3.15(1) as follows:</p> <p><i>“Highly mobile <u>indigenous fauna areas</u> Every regional council must work together with <u>landowners and</u> the territorial authorities in its region <u>and those that it shares a jurisdictional boundary with</u> to survey and record areas outside SNAs where highly mobile <u>indigenous fauna</u> have been, or are likely to be, sometimes present (in this clause referred to as highly mobile <u>indigenous fauna areas</u>).”</i></p> <p>25. That Central Government provide support to regional councils and territorial authorities to assist in resourcing the identification and management of highly mobile indigenous fauna areas outside of significant natural areas.</p>

Provisions	Submission	Relief Sought
	<p>inclusion in plan provisions, and that this activity should not be rushed if it is to achieve the desired outcomes sought by the pNPS IB.</p> <p>With respect to clause 3.15(1), and as previously discussed, Graymont considers that landowners hold a wealth of information about the flora and fauna present on their properties, and that councils should be required to work with landowners to benefit from such information, build transparency in the process and develop practical solutions.</p> <p>Further, while not wishing to see duplication across planning documents, Graymont considers that it is appropriate for regional councils to work not only with those territorial authorities within its region, but also to work with those councils that share a boundary with the regional council. Graymont notes that highly mobile indigenous fauna may move across a broad area that extends well beyond jurisdictional boundaries.</p>	
12. RESILIENCE TO CLIMATE CHANGE		
<p>Clause 2.2, policy 3</p> <p>Clause 3.5</p>	<p>Graymont supports the focus provided in the pNPS IB for ensuring that indigenous biodiversity is resilient to the changing climate. However, the Company notes that this relies on good information being readily available to decision makers. The potential impacts of climate change on indigenous biodiversity are complex and often highly uncertain, which makes planning for them difficult. This can be compounded by a lack of regionally specific climate change data.</p>	<p>26. Retain policy 3</p> <p>27. Retain clause 3.5</p> <p>28. That further research be undertaken and provided to local government on climate change trends/predictions by region, and on the implications of such trends/predictions on local indigenous biodiversity. With this, that guidance be provided to local authorities on methods for</p>

Provisions	Submission	Relief Sought
	<p>Graymont considers that work is needed to fill crucial information gaps and support the implementation of clause 3.5. While this will likely be costly, without the necessary information councils may impose either unnecessarily restrictive planning provisions (which can result in unnecessary costs to landowners and resource users), or provisions that may not go far enough in ensuring that biodiversity is resilient to changes in the climate. Graymont considers that guidance from central government will be crucial to support the integrated and effective implementation of policy 3 and clause 3.5.</p>	<p>maintaining ecological integrity through natural adjustments of habitats and ecosystems to climate changes.</p>
<p>13. PRECAUTIONARY APPROACH</p>		
<p>Clause 2.2, policy 2 Clause 3.6</p>	<p>Effective implementation of policy 2 and clause 3.6 is reliant on councils understanding the precautionary approach and how it should be applied when assessing and managing the adverse effects of proposed activities on indigenous biodiversity. It is important that implementing the precautionary approach does not result in over regulation or unnecessary restrictions on subdivision, use and development. Graymont is concerned that there is no specific guidance on how the precautionary approach is to be applied by local authorities when managing indigenous biodiversity.</p> <p>While policy 2 and clause 3.6 refer to both the uncertainty of effects and the potential significance of the effect, there is a risk that this provision, as proposed, is overused and applied to situations where the effects are not potentially significant. This concern relates to use of the word “<i>but</i>” as a part of the proviso for application of the precautionary approach rather than “<i>and</i>”. The wording proposed in the pNPS IB implies a different relationship</p>	<p>29. Amend policy 2 and clause 3.6 of the pNPS IB to read as follows:</p> <p>Policy 2</p> <p><i>“to ensure that local authorities adopt a precautionary approach towards proposed activities with effects on indigenous biodiversity that are uncertain, unknown, or little understood and the threat is of but potentially significant <u>adverse effects</u>:</i></p> <p>clause 3.6</p> <p><i>“Local authorities must adopt a precautionary approach toward proposed activities where -</i></p> <p><i>a) the effects on indigenous biodiversity are uncertain, unknown or little understood; <u>but and</u></i></p>

Provisions	Submission	Relief Sought
	<p>to the requirement for both criteria to have been met before the precautionary approach is applied.</p> <p>The Company supports the section 32 report associated with the pNPS IB where it states that the core elements of the precautionary approach are that it should only be applied where:</p> <ul style="list-style-type: none"> • there is uncertainty; and • there is a threat of adverse effects; and • the threat of adverse effects is potentially significant. <p>Over use of a precautionary approach can lead to a higher burden on applicants to 'prove' the scale of potential effects, and this in turn can lead to unreasonable costs being borne by applicants and unnecessarily constrained development.</p> <p>Graymont also supports the section 32 report where it notes that application of the precautionary approach may include adoption of an adaptive management approach, or declining a resource consent application in certain circumstances; and the section 32 report also notes that policy 2 and clause 3.6 should not be used to impose stringent consent conditions or monitoring requirements, or as a basis to decline resource consent applications, where the potential adverse effects are unlikely to be significant. These details are not explicit in policy 2 or clause 3.6, and Graymont considers that if specific reference is to be made to adoption of the precautionary approach with the pNPS IB, then such details should also be explicit.</p>	<p><i>b) those effects are potentially significantly adverse.</i></p> <p><i><u>b) the threat is of potentially significant adverse effects.</u></i></p> <p><i><u>clause 3.6A</u></i></p> <p><i><u>The application of the precautionary approach may include the adoption of adaptive management methods."</u></i></p> <p>30. If policy 2 and clause 3.6 are to be retained within the pNPS IB, in addition to adopting the preceding relief sought, Graymont seeks the provision of robust guidance to local authorities on implementing the precautionary approach.</p>
14. RESTORATION AND ENHANCEMENT		

Provisions	Submission	Relief Sought
<p>Clause 2.1, objective 5 Clause 2.2, policy 11 Clause 3.16</p>	<p>Graymont supports the inclusion of objective 5, policy 11 and clause 3.16; however, as proposed, the Company considers that objective 5 and policy 11 are too broad and may lead to overly restrictive provisions local planning requirements. Graymont considers that while enhancement and restoration may be warranted in some instances, it is not always necessary.</p> <p>Further to the preceding submission, Graymont notes that the implementation provisions for objective 5 are largely focused on promoting and incentivising restoration and enhancement actions rather than regulating for the same. Graymont supports this approach and notes that in the Company’s experience, adopting purely regulatory-focused solutions to protect indigenous biodiversity can lead to landowner resistance and opposition to indigenous biodiversity protection and enhancement efforts.</p>	<p>31. Amend objective 5 as follows: <i>“to restore indigenous biodiversity <u>where it is degraded</u> and <u>thereby</u> enhance the ecological integrity of ecosystems”</i></p> <p>32. Amend policy 11 as follows: <i>“to provide for the restoration and enhancement of specific areas and environments, <u>where they are degraded</u>, that are important for maintaining indigenous biodiversity</i></p>
<p>15. INTEGRATED APPROACH</p>		
<p>Clause 2.1, objective 4 Clause 2.2, policy 4 Clause 3.4</p>	<p>Graymont considers that it is critical that an integrated approach to managing indigenous biodiversity be adopted, both in terms of ecological integration (i.e. ki uta ki tai) and in terms of integration between administrative bodies. GRAYMONT considers that an integrated approach will:</p> <ul style="list-style-type: none"> • assist in establishing clear roles and responsibilities between councils; and • allow for the pooling of information; and 	<p>33. Retain objective 4. 34. Retain policy 4. 35. Either, delete clause 3.4(c); or 36. Amend clause 3.4(c) as follows: <i>“<u>recognising and coordinating with considering</u> the <u>indigenous biodiversity</u> requirements of strategies and other planning tools required <u>by</u>, or provided for in, legislation and relevant to <u>indigenous biodiversity</u>”</i></p>

Provisions	Submission	Relief Sought
	<ul style="list-style-type: none"> • foster partnerships and sound relationships between local authorities and broader parties; and • lead to a more consistent approach for the management of indigenous biodiversity, both across local authority boundaries and across terrestrial, freshwater and coastal environments. <p>However, Graymont is concerned that clause 3.4(c), as currently written, is vague and is more appropriate as a guidance note than being a requirement within the pNPS IB. If it is to remain in the pNPS IB, then Graymont considers that it needs to be strengthened by requiring recognition of, and coordination with, other strategies and planning tools related to indigenous biodiversity (not just consideration of such documents), and by identify the specific strategies and planning tools that this clause applies to.</p>	<p>37. Further to the preceding submission, amend clause 3.4(c) to identify the specific strategies and planning tools that this clause applies to.</p>
16. TIMEFRAMES		
<p>Clauses 1.5(3) to 1.5(5) inclusive</p> <p>Clauses 3.8(3) to 3.8(8)</p> <p>Clause 3.18</p>	<p>As previously discussed, a number of timeframes are set in the pNPS IB and are required to be met by local councils, for example:</p> <ul style="list-style-type: none"> a) Plan and regional policy statement changes are required by the pNPS IB to be notified by the 31st of December 2028 (clause 1.5(3)); b) Territorial authorities must have identified and classified the significant indigenous vegetation and/or significant habitat of indigenous fauna within 5 years of the commencement of the pNPS IB (clause 3.8(3)); c) Where areas of significant indigenous vegetation and/or significant habitat of indigenous fauna have previously been identified by councils they must, within 3 years of the commencement of the pNPS IB, be assessed "by a suitably 	<p>38. Add new clause 5 as follows:</p> <p><u><i>a) This clause applies to the implementation of this national policy statement by a local authority.</i></u></p> <p><u><i>b) A local authority may extend the dates in this national policy statement that apply to it if it considers that:</i></u></p> <p><u><i>i. meeting that date would result in lower quality planning; or</i></u></p>

Provisions	Submission	Relief Sought
	<p><i>qualified ecologist</i>” as complying with Appendix 1 of the pNPS IB (clause 3.8(4)); and they must be classified as being High or Medium (in accordance with Appendix 2) within 5 years of the commencement date (clause 3.8(5));</p> <p>d) Territorial authorities must notify any plan or plan change necessary to map areas of significant indigenous vegetation and/or significant habitat of indigenous fauna within 6 years of commencement of the pNPS IB (clause 3.8(6)); and every 2 years after this every territorial authority must notify a plan change to add any areas that have been identified as SNAs as a result of resource consent application, notice of requirement or other means (clause 3.8(8));</p> <p>e) Every 10 years territorial authorities must update district plans (clause 3.8(7)) including the identification of significant indigenous vegetation and/or significant habitat of indigenous fauna; and</p> <p>f) 6 years following the commencement of the pNPS IB, regional councils are required to have a regional biodiversity strategy in place (clause 3.18(4)).</p> <p>As previously discussed, each of these processes and timeframes require specialist ecological expertise. Graymont is concerned that there is not enough of the necessary expertise available within New Zealand to meet these requirements, and in the absence of such expertise the robustness of identification and management of SNAs will be considerably compromised. Given the importance of maintaining indigenous biodiversity, while at the same time not imposing unnecessary costs on landowners, Graymont seeks the inclusion of a clause similar to Section E of the NPS FM.</p>	<p><u>ii. it would be impracticable for it to complete the required implementation by that date.</u></p> <p><u>c) any extension of a timeframe made under subclause b) must not be more than twice the timeframe for the same requirement as set elsewhere in this national policy statement.</u></p> <p><u>d) Where a local authority is satisfied that a date should be extended, it may implement the associated requirement by a programme of defined time-limited stages.</u></p> <p><u>e) Any programme of time-limited stages is to be formally adopted by the local authority by 31 December 2021 and to be publicly notified.</u></p> <p><u>f) Where a local authority has adopted a programme of staged implementation, it is to publicly report, in every year, on the extent to which the programme has been implemented.</u></p>

Provisions	Submission	Relief Sought
17. IMPLEMENTATION GUIDANCE AND SUPPORT		
All provisions.	<p>In a number of the preceding submissions, Graymont has sought the provision of guidance material to local authorities to assist in the implementation of the pNPS IB. In addition to these submissions, Graymont seeks that all guidance material developed (either as proposed in the pNPS IB or as requested in Graymont’s submissions) is done so by independent panels of experts relevant to the guidance being developed, and that there is an opportunity for landowners and other parties who may be affected by such guidance to provide feedback to draft versions.</p> <p>Further to the provision of guidance material, Graymont considers that central government funding may be needed to ensure that local government, landowners, communities and tangata whenua can fully engage in implementation of the pNPS IB. Graymont seeks the establishment of such a fund, with defined application timeframes and processes, and criteria for assignment of funds.</p>	<p>39. That guidance material be developed and provided as sought within Graymont’s submissions.</p> <p>40. That all guidance material (either as proposed in the pNPS IB or as requested in Graymont’s submissions) is developed by a suitably qualification panel of experts; and that a draft version of the guidance material is made available to the public for feedback prior to being finalised.</p> <p>41. The establishment of a central government fund to ensure that local government, landowners, communities and tangata whenua can fully engage in implementation of the pNPS IB; and that the fund have defined application timeframes and processes, and criteria for assignment of funds.</p>



GRAYMONT

13 March 2020

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SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

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

Graymont is a global leader in lime and limestone solutions. Our products are essential in addressing some of New Zealand's most pressing environmental issues while supporting vital industrial processes and agricultural needs. Uses for our products include the purification of air and water, and the productions of items essential to a modern economy such as steel, paper, and metals. In New Zealand, some of the environmental initiatives requiring lime and limestone products include:

- Treatment of historic acid mine drainage on the West Coast, leading to improved water quality in local rivers.
- An ingredient in a novel phosphorous fertiliser, resulting in reduced leachate of phosphorous to waterways.
- Remediation of historically contaminated sites, such as the Tui Mine.
- Treatment of water from agricultural processing sites, so that it can be irrigated to land.

Lime and limestone products are produced at four manufacturing sites in rural areas of New Zealand. Graymont recognises the importance of protecting indigenous biodiversity and suggests some improvements to the proposed Policy Statement.

My email address is: bmurray@graymont.com

Yours sincerely

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Graymont

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