Submission - NPSIB

To: Ministry for the Environment

From: [Redacted]

Email: [Redacted]

Date: 8 March 2020

Subject: Submission on the proposed draft National Policy Statement for Indigenous Biodiversity ("NPSIB")

1. Thank you for the opportunity to provide feedback on the proposed NPSIB.

2. [Redacted] is a [Redacted] sheep and beef property located on the [Redacted] of the Rakiai River and the [Redacted] of the Mount Hutt range. The [Redacted] family has farmed this land since 1917 for over 100 years.

3. In the last 30 years, [Redacted] have been returned to conservation management through a catchment board run plan and tenure review.

4. The property was surveyed in the Protected Natural Areas (PNA) program in the late 1980's, the results of which reside in the Ashburton district plan as Significant Natural Areas (SNA's).

5. The property needs to be economically viable to allow management of exotic weeds and pests. However, the encroachment of indigenous species on to developed farmland needs to be managed as well. Especially woody plants such as Matagouri which pose the greatest economic threat.

6. We welcome the growth of indigenous vegetation in non-farmable areas such as gullies and riverbeds. We note that the best examples of tussock cover are on farmed overgrown areas as on many undeveloped areas hieracium has strangled the tussocks.

7. The property is in transition to the next generation and the above creates uncertainty surrounding the long-term economic viability of farming on the property.

General Responses to the proposals:

8. We oppose provisions which seek to 'lock up indigenous biodiversity' and in so doing penalise those landowners who have done the most to protect indigenous biodiversity. We seek changes to the policy to ensure that indigenous biodiversity can be integrated within pastoral based land uses and activities, and which recognise these can co-exist for mutual benefit.

9. When looking at 100-year-old photos of the property there is no woody vegetation to be seen. Whereas presently there are extensive areas of woody vegetation attesting to the viability of current management practices. We believe livestock where appropriately managed can actively combat weeds etc and allow the native plants to flourish.

10. 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.
Impacts and Implementation:

11. We are deeply concerned about the potential impacts of these proposals on our farm in relation to further 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 to their farming businesses.

12. The compliance costs of the various proposals are likely to be significant and include the identification of these habitats and species, fencing of these habitats (could require deer fencing to manage wild populations), and ongoing pest management. As currently proposed, it is unclear where these costs fall. Financial, technical, and human resourcing support should be provided to assist landowners to continue to protect and restore indigenous habitats and populations within their farming businesses and communities. Support should be provided to not only areas where indigenous biodiversity is being restored, but also to where it currently exists.

13. We are concerned that New Zealand risks reinventing the wheel and overlooking the extensive work already done to protect Indigenous Biodiversity likely resulting in significant costs that councils nor farming businesses can afford. i.e. The PNA program

14. The proposed statement abuses property rights and offers no compensation for loss of economic viability. If compensation was offered at market rates in perpetuity, then the farm could consider allowing indigenous biodiversity to further enhance in certain areas provided the remaining areas of the farm are allowed to be managed free of unreasonable environmental constraints. Where unreasonable means those which impact economic viability for no ecological gain.

15. Any statement should be undertaken in a way which engages landowners and communities, builds understanding and knowledge, and which empowers local conservation efforts.

Conclusion:

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

- This submitter endorses and supports the submissions by Federated Farmers of New Zealand and Beef and Lamb NZ.

- For any inquiries relating to this feedback please contact [redacted] on the email address provided above.