

From: [REDACTED]
To: [Indigenousbiodiversity](#)
Subject: Submission on indigenous biodiversity
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To Ministry of Environment
Re Indigenous Biodiversity
From [REDACTED]
[REDACTED]

10th March 2020.

Thank you for the opportunity to submit on this document

and I appreciate your careful perusal of my submission and the concerns expressed below

We farm [REDACTED] on West Coast of Golden Bay. A dry stock farm producing meat and wool on rolling to steep coastal land .

The farm has been in the family for 80 years and we are 2nd generation on the land. We have low stocking rate on the property and have no plans to develop or intensify.

We consider that we manage the environment carefully...which is exactly why we still have indigenous plants, animals and wetlands on the farm.

1) This document causes us great concern as we have experienced the wetland identification process a couple of years ago and feel that this is another unknown for us as private property owners.

The timeline of the process is too short and there is no consideration of financial impacts.

For this document to come at this time makes a mockery of all the talk this government does about mental health issues and expressing concerns about well being of rural people .

We are anxious about the impact and uncertainties of this , plus ONLs, wetlands, fresh water proposals, possible Ramsar designation on our doorstep and increasing demands from non farming groups.

Social, cultural and economic wellbeing must be taken into account as well as environmental.

2) 2 years ago Tasman District Council (TDC) made a start on identifying and protecting wetlands. 47 circles were drawn on the map of our farm. We had a choice to accept that or have an on-the- ground scientific inspection. We chose to have it checked out as did most landowners. 2 expert ecologists took 2 days to examine our farm and the district inspections have not been completed yet .

So when this Indigenous Biodiversity proposal has only 5 years to be completed that seems to indicate that it will not be a thorough process but will rely on maps which are not always reliable.

3) Another concern is that councils with most areas to be assessed tend to be rural (as in urban spaces most indigenous biodiversity is gone)

There fore the significant cost of this process is going to fall on rural ratepayers.

As this process is to identify nationally significant places then the cost of it must be born nationally as well.

4) The outcome of our wetland experience was that sites have been identified on our place which are only a mere few square metres in size as well as others measured in hectares.

And in my opinion that is not the intention of that process (or this one) that every single site be listed

It concerns me that is same criteria of identifying every single site as significant for indigenous biodiversity (as it was for wetlands) that will add up to alot of sites , hectares of land and alot of uncertainty about what that meansfencing issues, effects on management , how much it will cost .

5) Much of the indigenous flora on our farm is manuka. If that is not sprayed on a regular cycle the area expands rapidly as manuka seeds profusely and spreads readily.

So another concern with this process is that there needs to be recognition of the longer term cycle over 8 to 10 years of spray and regrowth,,,,rather than taking a short term snapshot.

If this cycle is stopped then manuka , which is vigorous, will quickly encroach on grazing pasture and reduce effective farmland.

6) The document has no mention of any cost analysis for the potential changes it will impose. This is a huge

oversight showing lack of respect for the landowners who still so have indigenous biodiversity on their properties . This is only there because people have managed it well and not drained, chopped, killed, sprayed , subdivided and got rid of it all.

Financial calculations are required to work out real figures of costs, potential impacts and monetary compensation.

7) Recognition in the form of financial compensation to landowners who have retained significant natural areas. Many farms have removed trees and native habitat as they have developed and intensified plus importantly thousands of hectares of wetlands and indigenous habitat are now covered with concrete, tarseal, houses and factories in urban areas.

That makes the remaining areas valuable (which is what this process is recognising)..so please put some money into recognising the value of the landowners who have preserved the biodiversity and who are expected to continue to do so with added restrictions imposed.

and I don't mean just one off token rates relief but a significant benefit. Which is why financial analysis is vital . At the moment the model appears to be that the cost of maintaining indigenous biodiversity is falling on the landowner who has been responsible and retained valuable areas. That is in effect punishing the very people who still have these natural places intact .

My suggestions...1) Increase the timeline...there is no rush, and possibly not enough ecologists are available to do the job well in limited time.

2) Central government to financially support rural councils to employ scientists to do the ground work. Spread the burden nationally as the benefit of the process is national and should not impact on ratepayers in areas with higher indigenous biodiversity.

2) Not every single site which has indigenous plants/animals needs to be identified. Please clarify the criteria more consistently and specifically.

3) Allow for the continuation of the regular cycle of spray and regrowth . If this is not taken into account manuka will take over the grassland.

4) Make financial analysis of the potential impact of identifying and protecting these areas an urgent priority.

5) Then calculate a figure for compensation so the burden for preserving these areas does not fall on the landowner alone but is a recognition that community does value indigenous biodiversity .

Thank you for your time to consider this submission.

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