

From: [REDACTED]
To: Indigenousbiodiversity
Subject: National policy statement for Indigenous Biodiversity submission.
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This is a submission on the National Policy statement for Indigenous Biodiversity From [REDACTED]

I like the concept of recognising the importance of Biodiversity in New Zealand.

I am a sheep and beef farmer in the Moutere. I do have small areas of native vegetation on my farm which over the years that I have owned the place I feel I have enhanced. When I came here all the gulleys were gorse infested areas with a few struggling natives in the bottom of the gulleys. By spraying and grazing I have managed to get rid of the gorse and now have some very healthy natives in the bottom of the gulleys.

All privately owned farms where they are sole traders look after their biodiversity and have improved it over the years. Over in Wakefield Weka have been appearing around a friends woolshed and the shed is a long way away from any native bush.

My main oppositions are to the following clauses:-

3.2 A huge burden is going to be imposed on Councils which is only going to increase rates for farmers. I am all ready paying over [REDACTED] with the only service being recycling picked up once a fortnight.

3.3 (3) c I am opposed to Maori being given customary rights for sustainable customary use of indigenous vegetation. If its good enough for one people its good enough for us all. The whole reason for this bill is to increase the indigenous biodiversity not to eat it.

3.6 I oppose this. Most of NZ biodiversity is little understood, un-described and unknown. The effect of farming activities on that biodiversity is not understood. This may very well mean that farmers will have to prove that an activity will not have an adverse effect on a habitat or species. Tony Whittaker was the first ecologist (in the early 1970's) to say that rats were a problem to skinks, birds and geckos. Once rats were targeted skinks, gecko and bird populations improved. Let farmers go on looking after their biodiversity as they have been for generations.

It looks like a consent is going to be needed before a farmer can do anything very much in changing his operation which adds a cost to the business. This puts the councils in the position of grand parenting farmers. We have achieved an awful lot in this country with the number eight wire philosophy . We have also managed to look after the environment while doing so.

3.7 I oppose. It looks like subdivisions are going to be favoured and allowed to do what they like while farmers are going to be told very

much what they can and cannot do. A huge compliance cost for councils.

3.8 I oppose this clause . This may well mean that any native vegetation on your property becomes a SNA . A SNA needs to be standardised. The clause is far too broad and the time line far too tight. Caanan Downs on top of the Takaka hill was sold to DOC in early 2000. DOC thought it was such an Iconic landscape they would shut the farm up. A lot of locals disagreed and DOC were persuaded to carry on farming it. Particularly when it was pointed out to them that the grass, broom, gorse, fern would grow up and cover the Kaast landscape, the place would become a fire hazard and would cease to be an Iconic landscape. There was some thought that native bush would regenerate of its own accord on the grass land. However all that happens is if a beech seed germinates the grass grows quicker in the spring and will smother it and not allow it to grow. The powelliphanta snails in the area seem to have done very well over the years with the land being grazed.

3.9 I oppose this clause. It applies to all new subdivision, use , development. 3.9a States the following adverse effects on the SNA are avoided. In other words you are not allowed to do something. The wording would be slightly more acceptable if it said to mitigate or manage.

There is a strong direction for the exclusion of livestock from all SNA's. Sheep have gone into the edge of beech forest on property's that are fortunate enough to have bush on them but they do not go very far in and hang on the edges. (I have experience of this having worked at Caanan Downs before it was sold to DOC) If stock are excluded from SNA's you could well end up with a weed and overgrown SNA not one that still looked outstanding. Part of the reason an SNA looks outstanding is because the area around it has been managed and grazed properly.

3.10 I oppose. Plantation forests should come under the same rules as everyone else. The only areas of SNA in them will be gulleys where they cannot plant trees. Any one who has walked through a pine plantation knows they have absolutely no life in the middle of them only around the edge.

3.12 I oppose. This clause leads to grand parenting. Farmers will not be allowed to change or increase scale. Farming is a dynamic business and is always changing to meet market requirements and the needs of the landowner .

The wording is extremely broad and does not have enough definition in the wording. Lizards are now found to be thriving in pastures so now prove to be part of the normal ecosystem.

3.13 I oppose. Areas outside of SNA can become treated as if in an SNA. This could mean that the whole property is defined as an SNA and is locked up or grand parented as to what can be done on that area with no evidence that it is going to help restore the biodiversity of the SNA area.

How big the area around an SNA needs to be is not defined.

3.15. I oppose. The wording is far too broad. This wants to be a partnership not a rule. Birds move around because of a food source. So if the food is available in an area let the birds go there but one cannot control where birds fly. So do not try and control the farmers whose land they occasionally decide to visit.

3.16. Areas all around the country are all ready being improved with native plantings. There is an area along the Company Ditch in the

Moutere that the council removed the gorse broom and willows and have planted in natives. On going work is needed to see it does not become covered in old mans beard and gorse again. Communities are starting to improve areas all around the country. If something is legislated are people so inclined to become involved.? The answer to that is a simple NO.

3.17. I Oppose. There is nothing defined and no cap on how much of the farm can be made to be replanted in native vegetation. Why should I have to plant ten percent of my productive sheep farm in Native vegetation and not the orchardist or vegetable grower down the road.

In conclusion

The potential issues i can see is the language of this document suggests restoration initiatives become a legal obligation to maintain biodiversity. Who is going to pay for this and how.? No one likes being made to do something.

This document potentially gives grounds for imposing requirements on farmers to actively manage pests and weeds, fence off SNA,s perhaps even retire land all together with no compensation and still have to pay rates on it.

I Believe that restoration initiatives should be non regulatory and should focus on supporting local conservation efforts.

It seems that the NPS treats communities and activities differently in relation to indigenous biodiversity and its management. This is not fair.

There will be significant costs for councils under the NPSIB

There is a lack of expertise in New Zealand combined with tight time frames which means councils are likely to resort to desktop mapping tools rather than ground proofing.

The cost benefit analysis is light on costs to landowners at implementing the NPS.

There will be a huge impact on rates for councils with large geographic areas and small rate payer bases. This is a huge concern.

Please think very carefully before this becomes a legal obligation.

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