

From: [REDACTED] on behalf of [REDACTED]
To: [Indigenousbiodiversity](#)
Cc: [REDACTED]
Subject: [REDACTED] Submission on the Draft National Policy Statement for Indigenous Biodiversity
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Other comments:

We understand the concern surrounding indigenous biodiversity . Our family has been looking after it for over 100 years on our little piece of paradise . It would appear that of the New Zealand total 26.8m hectares of land approximately 10% or 2.7m hectares comprises various types of indigenous habitats within sheep and beef farms of varying sizes scattered all over New Zealand.

We are aware that the representatives for Maori land (which would fall within that 2.7m hectare area) have sought a substantial lengthening of the five year period provided for SNA work by regional and district councils. They have set out their reasons . We would seek to extend that time period substantially also .

We deal with goats, stoats, ferrets, opossums, rabbits, wild deer, wild pigs, rodents , Canada geese, droughts, floods, wind storms, earthquakes, gorse and broom to mention just some of the challenges of farming . We would think that thirty years would be a more appropriate time frame. We know that the indigenous biodiversity will still be there because we live there and manage farming around it - the one complements the other. We also cost everything because we have too. We have not seen any costings around these SNAs but this looks really expensive to us.

We implore you to take our concerns on board and make the amendments we have asked for.

We support the overall goal of the proposals that recognise the value of indigenous biodiversity to New Zealand, its people, and communities, and to ensure that Indigenous Biodiversity is both protected and restored.

We support provisions which recognise that for conservation actions to be enduring, they require landowner (as custodians) and community support and leadership.

However, we oppose provisions which seek to 'lock up indigenous biodiversity' and in so doing penalise those landowners who arguably 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 (and do) co-exist for mutual benefit.

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.

Impacts and implementation:

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

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.

We are concerned that New Zealand does not currently have the extent of technical expertise available to assist regional and district councils to identify SNA's and mobile species across their territorial areas within the next five years.

Hutia Te Rito:

We 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.

We seek that the term "stewardship" is replaced with "custodianship" which more correctly reflects the values we place on indigenous biodiversity within our farm and as part of our family's history and our future, and our relationship and ties to our land.

3.7 Social, economic and cultural wellbeing:

We support the recognition that the maintenance of indigenous biodiversity can occur while still providing for use and development.

We seek that 3.7 be amended to recognise the importance of providing for farming land uses and business resilience, in supporting indigenous biodiversity protection.

We 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

3.8 Identifying Significant Natural Areas

We support the intent of 3.8 in identifying Indigenous Biodiversity which is significant. However, the criteria appears really broad and in our opinion could capture any indigenous biodiversity irrespective of how common it is.

We 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.

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

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

Similarly please 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.

We support the identification of areas with significant indigenous plants and or species, by experts working with communities and in partnerships with landowners.

We 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.

We seek the amendment of provision of 3.8 to enable local authorities the time to undertake this work in a robust manner.

3.9 Managing adverse effects on SNA's

We support requirements to manage new activities that affect significant natural areas. We seek amendment of 3.9 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.

Please amend 3.9 so that the requirements related 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.

Please amend the 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

We support the intention of providing for existing activities, but are concerned that 3.12 as proposed does not do this.

We 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.

We 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.

We seek that 3.12 be amended so that existing activities are provided for as a permitted activity.

We 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

We 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:

We support the intention of recognising areas around SNA's as important for protecting

SNA's themselves and their values.

We seek amendments to 3.13 to ensure that existing activities as outlined under 3.12 are provided for. We are 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 our farm being impacted which ultimately would significantly impact our farm viability and resilience.

We seek that 3.13 be 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. We seek that clause (2) be deleted.

We seek that 3.13 be 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:

We 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.

We oppose provisions which seek to mandate this protection through regulatory frameworks where this may impact on existing activities and land uses.

We seek that 3.15 be amended to prioritise non regulatory, partnership, and landowner led approaches to managing mobile species and their habitat and lifecycle requirements.

We seek that 3.15 be amended to prioritise engagement with the technical expert and landowner to co design management frameworks for the farm which ensures that mobile species are provided for as an inherent and integral part of the farming business.