

Consultation on the Indigenous Biodiversity National Policy Statement exposure draft legislation – B+LNZ's submission guidance

Beef + Lamb New Zealand (B+LNZ) will be making a submission on behalf of the sheep and beef sector on the draft legislation.

We have also developed this guidance to help farmers who want to make their own submission.

Information about the consultation is on the Ministry for the Environment website here:

<https://consult.environment.govt.nz/biodiversity/npsib-exposure-draft/>

MfE require feedback via an online form at this link:

<https://consult.environment.govt.nz/biodiversity/npsib-exposure-draft/consultation/>

- There are 40 set questions but you don't have to respond to them all – **you can answer the questions that are important to you**, and can use some of the points below where relevant (note we highly recommend you **use your own words**, together with information and examples from your own situation). We recommend you answer **Subpart 2: Significant natural areas Question 14**, as this relates to the criteria for identifying SNAs.
- There's an **option to provide general comments** instead through the 'Provide feedback on the draft Implementation Plan or any further feedback' page – you can type directly into the text box or upload your own document.
- Note there are **required questions** – see the information below.

Submissions close on 21 July 2022.

Required questions

- **Your details**

Most fields on this page are marked 'Required' and you won't be able to continue without completing these.

- **Consent to release your submission**

You need to let MfE know if you agree to having your name and your submission published. You can also specify for parts of your submission to not be published.

Key points you could make

General:

- You could echo B+LNZ's concerns about the **timing of the exposure draft** when farmers are already facing unprecedented demands relating to climate, conservation and water policy changes.
- You could note that a **holistic, integrated approach** to policy development is important.
- You could say that while it's positive the Government has sought to make changes to address concerns, the legislation is still **flawed**.

- You could also note that farmers are passionate **guardians** of native biodiversity on farms and actively protect and restore indigenous habitats – providing examples from your farm.

Key concern – Significant Natural Areas:

- We recommend you raise concerns about the **criteria** for identifying SNAs. The criteria are broad and only one criteria needs to be met to meet the threshold for an SNA. SNAs will include virtually all areas of native biodiversity and this could be hugely restrictive for landowners on a significant proportion of their farms. (Relates to [Question 14 on the online form](#), which we recommend you complete as this is the key concern)
- You could note that **farmers who have done the most** to protect and enhance indigenous biodiversity will be the most tied up in red tape as a result.
- You might like to note that if nearly everything becomes significant, this devalues **true 'significant' areas**.
- You might also like to note that while MfE's supporting documentation suggests the **policy intent** is to only identify 'significant' areas, the criteria do not reflect this.
- If you can, it would be good to provide an indication of the **extent of your farm** that would be captured under this broad criteria.
- We suggest you raise concerns about the resulting **financial implications** – new activities in SNAs are highly likely to require resource consent with rigorous processes and significant costs for applicants. This would be less problematic if only true 'significant' areas were considered SNAs.
- You could also comment on the provision for the continuation of **existing use**, noting this is positive but raising concerns about the lack of clarity about what activities must be identified as existing use. (The supporting documentation for farming indicates the intent of this includes grazing, but this is not clearly specified in the NPS)

Implementation and support:

- You could note that the draft legislation requires local authorities to take a **precautionary approach** to implementing the legislation – while this is good in principle, in practice it could be widely applied with unnecessarily restrictive consequences.
- You might like to raise concerns about the **amount of work** councils will need to do in five years and whether this is achievable. This process will rely on accurately mapping and can't be a desktop exercise – it will involve getting on-farm. You could also reflect concerns about ecologist availability to confirm that SNA criteria have been met.
- You might also like to say it's critical that **landowners are supported** in managing indigenous biodiversity and that there should be a policy around that. Bringing implementation support into the NPS would reflect its importance and lead to better indigenous biodiversity outcomes.
- You could also note that the **funding package** outlined in the supporting documentation for implementation support is inadequate. Farmers are being required to spend time and money maintaining biodiversity, which supports broader ecosystem services, without adequate recognition or support.