



Federated Farmers of New Zealand

**Feedback to Ashburton District Council on:
Draft Ashburton District Biodiversity Strategy 2023**

26 November 2023



**FEEDBACK ON:
DRAFT ASHBURTON DISTRICT BIODIVERSITY STRATEGY 2023**

To: Ashburton District Council

Name of submitter: Mid Canterbury Federated Farmers (MCFF)

Contact person: Rachel Thomas
Senior Policy Advisor

Address for service: Federated Farmers of New Zealand
P.O. Box 20448
Bishopdale
Christchurch 8543

Introduction

- 1 Federated Farmers thanks Ashburton District Council ('the Council') for the opportunity to give feedback on the Biodiversity Strategy ('the Strategy').
- 2 Federated Farmers of New Zealand is a voluntary, primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers and their communities.
- 3 Federated Farmers aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which:
 - Our members may operate their businesses in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices.
- 4 The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%. Land-based primary sector exports comprise over 70% of New Zealand's total exports. Any legislation or regulation which affects farm businesses has the potential to also impact, positively or negatively, on district, regional and national economies and social structure.
- 5 This submission was developed in consultation with the members and policy staff of Federated Farmers. It is important that this submission is not viewed as a single submission, but as a collective one, that represents the opinions and views of our members.
- 6 We wish to present our submission in person at the hearing on 14 December.

General comments

- 7 Federated Farmers strongly acknowledges the importance of indigenous biodiversity. It is a part of who we are as New Zealanders, the things we proudly stand for and enjoy, and importantly, aspects we want to actively manage, protect and enhance, as well as delivering critical ecosystem services. Biodiversity and productive farm systems can, and do, work hand-in-hand.
- 8 Key to the success of any strategy on indigenous biodiversity, is the establishment and maintenance of 'trust' between landowners and councils. This relies heavily on an approach of partnership, respect, and inclusion of impacted landowners on all matters that relate to private land. Without this, there are real risks of eroding the social capital deeply connected to biodiversity outcomes. Establishing and giving full consideration and weight to the respective costs and benefits is key.

- 9 Unlike interest groups whose focus is often natural preservation at all costs, there are real costs to farm landowners in protecting biodiversity. For farmers, any regulation which makes it more difficult to farm deprives opportunities for potential revenue needed to invest in improving farm systems, pay property rates (and taxes) and grow food. If farmers cannot farm their land to obtain farm produce, they will not be able to afford to be biodiversity stewards. Recognition of these practical factors is needed to ensure biodiversity management is successful.
- 10 Biodiversity protection should be encouraged at all levels, from individuals, landowners, interest groups and communities, through to local, regional and central government. Protection of biodiversity must occur within a broader spectrum of biodiversity management tools. These should include low-intervention non-regulatory tools, such as information, education, funding assistance and other incentives, working upwards as necessary through to regulation.
- 11 At a broad level, we suggest the following measures:
- Ensuring sufficient information, advice, and knowledge is provided to landowners, to support and enable them to incorporate biodiversity into their day-to-day farm management.
 - Ensuring sufficient monitoring and reporting of biodiversity outcomes to enable tracking of success/failure of initiatives/progress, so that these can be built upon.
 - Ensuring support for landowners undertaking voluntary management of indigenous biodiversity habitats on privately-owned land that go beyond regulatory requirements.
 - The continued investment in the biodiversity grant for landowners/community groups to apply for assistance in relation to costs associated with preservation of biodiversity.
- 12 As part of our work in developing our submission on the (now gazetted) National Policy Statement for Indigenous Biodiversity (NPS-IB), Federated Farmers undertook a survey in 2019 of members nationally and these findings remain relevant. Through this survey farmers supported (in order of priority):
- Rates relief on land under regulatory protection (particularly Significant Natural Areas (SNAs)).
 - Provision of funding grants to landowners for the purpose of biodiversity management in areas under regulatory protection (particularly SNAs).
 - Waiving of council consent and processing costs related to biodiversity.
 - Cost sharing for ecological assessments on private land.
 - Provision of educational material and expert advice to inform farm decision making.

Biodiversity grant

- 13 We note that \$15,000 is available per year (detailed on p.26) as a biodiversity grant for community projects. The ADC website states that the maximum grant available per individual is \$7,500 (at no more than 50% of the total project cost).

- 14 We question if the amount allocated to this grant has increased in recent years, and if the Council is planning on increasing this amount when the policy settings change in relation to SNAs.
- 15 An assessment of other councils provides an interesting comparison:
- Nelson City Council - \$20,000 annually available per project as an Environmental Grant for individuals working to improve the health of the environment.
 - Waitaki District Council - \$30,000 annually available for landowners who are taking practical steps to protect and enhance indigenous biodiversity.
 - Waimakariri District Council – Biodiversity Contestable Fund available to owners of mapped SNAs (fund amount not disclosed).
 - Tasman District Council – Catchment Enhancement Fund available (amount not disclosed)
 - Christchurch City Council – Biodiversity Fund available of up to \$400,000 per year.
- 16 We would like to see the Council allocate more than \$15,000 annually. Protection of biodiversity is a public good, with the responsibility often falling to the private landowner to bear the cost. \$15,000 per project would be a more reasonable amount, but more work is needed to determine this.
- 17 An example of biodiversity as a public good is establishing a wetland which would benefit entire communities. The landowner would face several costs, including regional council consenting costs, hiring a digger/equipment, time and the cost of plants. Establishing a wetland could cost more than \$15,000.
- 18 Encouragement and education of landowners are methods the Council could use through promotion of the biodiversity grant but the amount available to landowners must be enough to incentivise landowners to undertake biodiversity protection. The Council must ensure the grant is well advertised and promoted. We suggest using Farmers Weekly or other rural publications.

Significant Natural Areas (SNAs)

- 19 SNAs are highly contentious, and we urge the Council to be cautious with how they are addressed in this strategy. We would like to understand how the Council plans on mapping SNAs as this has huge implications for the farming sector.
- 20 Farmers are fearful that identification of SNAs will lead to a decrease in the property value, as is occurring elsewhere in New Zealand. They are concerned that they will still have to pay rates for land which is not able to be farmed to the best potential.
- 21 MCFF believes that unless areas have been properly mapped and included in the District Plan, they cannot be treated by the Council as an SNA. Mapping of these areas must be undertaken in partnership with landowners. We would like to see this reflected in the strategy.
- 22 We support non-regulatory methods to managing SNAs and would be happy to work with the Council and our members to achieve this.
- 23 Long-term, there are opportunities to use technology to support farmers in some of the more challenging landscapes of the district. For example, fencing is not possible for many waterways

on steeper slopes of the Foothills. The use of Halter collars is something the Council could incentivise landowners to use, as currently the collars are not financially viable for this use.

Council's role

- 24 The mandate for a city or district council in protecting/enhancing biodiversity is less apparent than that of a regional council. There are many objectives in this strategy that may be better left to Environment Canterbury.
- 25 ADC can play a strong role in advocating for the interests of Ashburton District through Environment Canterbury's current and ongoing consultation 'What's our future, Canterbury?'. This is where we see ADC would best be placed to ensure biodiversity outcomes for the district are met.
- 26 Beyond the District Plan, we believe the role of ADC in promoting/protecting/enhancing biodiversity outcomes is limited. Through the NPS-IB and the Local Government Act 2002, Council does have a role to play in environmental well-being. However, this must be balanced against ensuring good economic outcomes. Setting an unrealistic biodiversity strategy could hinder the economic well-being of the district's rural communities.

Reporting

- 27 The Strategy states that reporting will occur annually. We would like to see a commitment from the Council in the Strategy that this report be made publicly available.

Feedback on specific objectives

Objective	Responsibility	Comments	Relief sought
1.1(A) Complete assessment of the district's ecological values, including significant natural areas (SNAs).	ADC, ECan, DOC, Rūnaka, community	We assume this objective relates to the mapping of SNAs and would like to understand if this will be a desktop exercise, or how this will be carried out.	Amend objective: 1.1(A) Complete assessment of the district's ecological values, including <u>mapping</u> significant natural areas (SNAs).
1.1(E) Prepare for plan changes to protect SNA and recognise land covenants.	ADC or Regional Planning Committee	We suggest the Council engage stakeholders in any plan changes related to SNAs. Farmers in this district are aware of the issues other farmers around the country are facing in relation to the mapping and identification of SNAs. Any plan change related to SNAs will be highly controversial.	Amend responsibilities: ADC or Regional Planning Committee and <u>stakeholders including Federated Farmers</u>
1.4(B) Review ADC vegetation clearance rule for Rural zones to provide better protection for indigenous biodiversity.	ADC	<p>Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being 'cleared'. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assist with regeneration.</p> <p>Vegetation clearance needs to be a permitted activity on all freehold land that is actively farmed. If we are not allowed to clear indigenous vegetation then overtime in conjunction with fertiliser Matagouri would take over.</p>	<p>When reviewing this part of the District Plan, we request a statement excluding grazing. This could be achieved by including the following definition of indigenous vegetation clearance:</p> <p><i>Means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, burning or any other mechanical means. It does not include grazing of pasture or improved pasture species in that area of indigenous vegetation.</i></p>
2.1(A) Advocate to increase the indigenous vegetation cover target as set in the NPS-IB or by	ADC, Rūnaka, ECan	We see this more as a regional council role and the Council should therefore exercise caution here. The desire to increase indigenous vegetation comes at a cost to landowners and trade-offs must be considered. While	Remove this objective.

Objective	Responsibility	Comments	Relief sought
the regional council at the local level.		in theory increasing indigenous vegetation is positive, the impact on farmers could be significant and therefore a balance must be achieved.	
2.1(C) Investigate the use of stormwater swales, MAR (Managed Aquifer Recharge) sites, rivers and stockwater race networks to improve native vegetation cover in the district.	ADC, Rūnaka, Irrigation Companies, ECan, Landowners, MCCC	<p>MCFF supports this objective as it enables the use of surplus water for improving native vegetation.</p> <p>The ADC role should be to not only investigate, but also to support and enable strategic planting in areas where surplus water can be best utilised.</p>	Amend objective: 2.1(C) Investigate, <u>support, and enable</u> the use of stormwater swales, MAR (Managed Aquifer Recharge) sites, rivers and stockwater race networks to improve native vegetation cover in the district.
2.2(C) Support landowners' biodiversity projects that will improve ecological corridors.	ADC	We support this objective but if the Council is serious in supporting landowners then there needs to be more financial support available than the \$15,000 grant.	Adopt as drafted but increase the biodiversity grant amount.
2.3(A) Investigate incentives to landowners with indigenous native vegetation sites on their farmlands. 2.3(B) Provide incentives to landowners with indigenous native vegetation sites on their farmlands.	ADC	We have made several comments on the biodiversity fund, but other incentives the Council could consider are: waiving consent fees for farmers carrying out biodiversity work, providing rates relief for those with identified SNAs on their properties, and providing an ecologist to support those with indigenous native vegetation sites.	We support these objectives but they must align with the mapping of SNAs (i.e. as soon as the SNA mapping begins, the incentives should be available). We would be happy to work with the Council on developing the incentives.
4.1(A) Strategic partnerships with stakeholders and relationships are fostered through regular ADBAG meetings. (B) Maintain appropriate Council representation in stakeholders with an interest in biodiversity.	ADBAG, Stakeholders	We support these objectives as written. It is crucial that Council continue to engage with Federated Farmers, particularly when the Council begins the SNA mapping process. Farmers are concerned that the identification of SNAs on their land will lead to a decrease in their property value. It is therefore vital that farmers are represented in all possible discussions regarding biodiversity.	Adopt as drafted.

Feedback on the Glossary

Definition	Comments	Relief sought
<p>Ecosystem - A community or group of living organisms that live in and interact with each other in a specific environment.</p>	<p>We recommend the Council align this definition with the NPS-IB. The proposed definition has been overly simplified.</p>	<p>Replace definition with NPS-IB definition:</p> <p><u>Ecosystem means the complexes of organisms and their associated physical environment within an area (and comprise: a biotic complex, an abiotic environment or complex, the interactions between the biotic and abiotic complexes, and a physical space in which these operate).</u></p>
<p>Indigenous biodiversity - the living organisms that occur naturally in New Zealand, and the ecological complexes of which they are part, including all forms of indigenous. flora, fauna, and fungi, and their habitats.</p>	<p>We support this definition as it aligns with the NPS-IB.</p>	<p>Adopt as drafted.</p>
<p>SNA - Significant natural area - an area that has significant indigenous vegetation or habitat of indigenous fauna. A SNA may include remnant native bush or native forests, wetlands, frost flats, lakes and rivers, or geothermal vegetation.</p>	<p>We do not agree with the proposed definition of SNA. As currently written, the definition is overly simplified and could lead readers to think that areas with significant indigenous vegetation are immediately defined as an 'SNA'.</p> <p>The definition does not align with the NPS-IB. The definition of a SNA as per the NPS-IB states 'any area that, after the commencement date, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1'. Therefore until the identification is carried out any unmapped areas should not be treated as SNAs.</p>	<p>Amend definition:</p> <p>Significant natural area – <u>is an area that, as per the NPS-IB has been mapped and included in the Council's District Plan, and</u> has significant indigenous vegetation or habitat of indigenous fauna. A SNA may include remnant native bush or native forests, wetlands, frost flats, lakes and rivers, or geothermal vegetation.</p>

Conclusion

MCFF thanks Ashburton District Council for the opportunity to provide feedback.

David Acland
Mid Canterbury Provincial President