

Significant Natural Areas: Are you ready?

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Significant Natural Areas (SNAs) remain the central mechanism in the latest draft of the National Policy Statement for Indigenous Biodiversity (NPSIB) released June 9, 2022. As we set out on our earlier article, SNAs are tracts of land that contain significant indigenous vegetation and/or significant habitats of indigenous fauna, protected by the Resource Management Act 1991 (RMA) for their high ecological biodiversity value.

Building on the consultation draft released in November 2019 the NPSIB more closely resembles the National Policy Statement for Freshwater Management (NPSFM). Six objectives have been replaced with a single objective incorporating a central concept from the whakataukī Te Rito o te Harakeke.

SNAs are coming

Among the ways in which territorial authorities must give effect to Te Rito o te Harakeke is by undertaking a district wide assessment of the land to identify SNAs. Local authorities are required to update their policy statements and/or plans to ensure any new subdivision, use or development avoids the following adverse effects on SNAs:

- (a) *loss of ecosystem representation and extent:*
- (b) *disruption to sequences, mosaics, or ecosystem function:*
- (c) *fragmentation of SNAs or the loss of buffers or connections within an SNA:*
- (d) *a reduction in the function of the SNA as a buffer or connection to other important habitats or ecosystems:*
- (e) *a reduction in the population size or occupancy of Threatened, At Risk (Declining) species that use an SNA for any part of their life cycle.*

The changes to plans and policy statements must also ensure that any other adverse effects on SNAs are avoided, remedied or mitigated. There are carve outs for geothermal SNAs, SNAs on Māori lands, and SNAs within a plantation forest.

SNAs are clearly central to the NPSIB, and Councils will be empowered to enter property for the purpose of identifying new ones, where they could not before. The powers of entry under Section 333 of the RMA will be available as a method of last resort, when permission is not granted by the landowner to identify new SNAs. Additionally, SNAs can be identified through resource consent applications and other processes where information about your property is provided to the local, regional or territorial authority.

What is not clear is how SNAs will interact with QEII covenants which remain a good option to support indigenous biodiversity.

Below are some simple steps you can take to prepare. In general these steps mirror the steps councils will have to follow from December when the NPSIB comes into force.

Now is a good time to prepare

Step 1: Have a think about any areas or pockets on your property that are likely to contain indigenous biodiversity. This is often in gullies, around waterways, terrace edges or hill country that don't get regularly cultivated. Perhaps mark these areas on your farm map.

This will be similar to the first step that local authorities will be required to take when the NPSIB comes into force. They will use the following criteria which individuals can too to help identify potential SNAs.

1. **Representativeness** - Are there areas of indigenous vegetation typical in the district? Like areas of tussock in the high country.
2. **Diversity and pattern** - Does the area have a range of indigenous plants, animals and insects which are typical of the district? For example, different flaxes growing in a gully which provide habitat for birds.
3. **Rarity and distinctiveness** – Are there indigenous vegetation, habitats or ecosystems which feature on the list of Threatened and At Risk species regularly updated by the Department of Conservation (DOC)?
4. **Ecological context** – How does a particular area relate to the wider area. Does it stand alone or is it one of a series of area in close proximity?

Step 2: Get out and about and have a closer look at the areas that you identified or thought of. See what species you can see, take some photos and look out for the presence of 'highly mobile fauna' specified in Appendix 2 of the NPSIB. The presence of these species increases the likelihood of the area being an SNA.

There are some useful apps which can help you identify plants you find. DOC recommends [iNaturalist](#). [Flora Finder](#) is provided by the University of Otago but is only available for iPhone or iPad. [Plantsnap](#), and [Pl@ntnet](#) are a couple of good international options. If you spot anything you are still not sure about, you may like to take some advice. The [Botanical Society of Otago](#) and the [New Zealand Plant Conservation Network](#) also have experts who can help you identify what you find.

Local authorities are encouraged to undertake physical assessments but are unlikely to have sufficient resourcing to do so. In the early stages of NPSIB implementation knowledge is power.

Step 3: Consider how the restrictions which local authorities are required to apply to SNAs set out above would affect your operations if they were applied to the areas you have identified.

Step 4: Proactively plan how you will mitigate those effects. Our Resource Management team can assist with tailored advice about how the changes are likely to impact your property.

Though these steps will not remove the impact of the changes they will allow you to prepare for them and to take advantage of the window of time before local authorities begin their assessment to ensure you are operationally ready for them.

The Upside

SNAs, particularly those containing woody vegetation may qualify for the New Zealand Emissions Trading Scheme (ETS). Though farmers and producers are not required to surrender emissions units they can still participate in the ETS.

Agricultural emissions accounting is being developed by He Waka Eke Noa, a collaborative partnership between key primary sector stakeholders. The partnership has proposed a farm level split-gas levy based on greenhouse gases produced less greenhouse gases sequestered by activities on the land. As part of the proposals to government He Waka Eke Noa is exploring including non-ETS plantings in agriculture emissions accounting which opens the door for a broader group of SNAs to provide carbon sequestration benefits.

While much of this work is still 'in progress', SNAs may well be of benefit from a sequestration point of view depending on what plants are in them.

SNAs can also provide other benefits beyond increasing indigenous biodiversity and carbon sequestration; they can improve erosion control, provide shade and shelter and enhance waterways.

Consultation is open

Feedback is being sought about the draft NPSIB until 21 July 2022. Have your say at <https://consult.environment.govt.nz/biodiversity/npsib-exposure-draft/consultation/>

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