

CONSULTATION ON NATIONAL POLICY STATEMENT ON INDIGENOUS BIODIVERSITY

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Hamilton 3286

[REDACTED]

[REDACTED]

I have read the Draft, and the Discussion Doc and the B+LNZ fact sheet and a Feds Fact Sheet. Overall I have several issues I need to cover in my submission.

1. There are so many changes to existing documents proposed all over the place at present. I'm just concerned that they are all in overarching agreement on RMA, environment, water, biodiversity and probably climate change. It seems as though there will need to be a number of changes to a number of Acts, and a huge amount of departments and ministries working together. The new State Sector Act will have to ensure that this happens, and that it all happens soon, so that those trying to work with the various Policy Statements (eg farmers) can be clear about the whole process. Farmers may moan each time something new crops up, but they need to be able to see the whole process and picture before having to spend any more of the money they haven't got and the banks don't want to give them.
2. There is almost nothing in the Policy Statement about where the native plants would come from, and what they might cost, and who pays. Who is going to have the knowledge about what goes where and provide advice (and not just regulation) over the various levels of the 'effects management hierarchy'. In the Waikato we already have a Maori group raising thousands of plants for Council projects, and one would hope that they could expand to supply individual projects as well. At present the whole thing is much too vague about HOW all this stuff would be done. Again it would currently give farmers a huge excuse to moan, and I don't see that the whole task should be lumped onto Regional Councils and Districts. They are reeling at the idea of what is needed over SNA's, and there will be a need for a clear nationally recognised process with details. The RMA was a disaster from the beginning because Labour intended to produce clear guidelines but Upton simply handed it over and everyone did it differently.
3. The integration of Maori input and concepts will probably work in the Waikato because we already have the Vision & Strategy for the River and are used to it. But in other parts of NZ it may well be a big change in thinking and acting required by Councils. It must be done, but stepping stone guidelines on what to do in order may well be required. There is far too much 'assuming' coming out of Government which widens the disconnect between urban and rural and Councils and their populations.

4. There appears to be a general assumption that QEII will be heavily involved in protecting existing biodiversity and the potentials mentioned in 3.9. The people who move to QEII are, in the main, 'protectors' and can be very different types of people to those who suddenly see regulation bearing down on them. The explicit difference in things like rates rebates, fencing subsidies etc will need to be spelled out for both SNAs and QEIIs. At a Waikato Feds Exec meeting last week it was obvious that most farmers don't know this sort of thing.
5. I see some potential confusion, not least among Maori, over the development of Maori land. If, as I have understood it up to now, they are expected to make more financial gain from use of their land, how would this work? And I have no doubt that there will be some, Maori and Pakeha, who expect that this would involve Maori putting most of their land into bush, which might be helpful in one way, but not at all helpful in getting them to be self-sustaining from their land.
6. The Precautionary Approach (3.6) is rather vague, and again puts the responsibility onto Councils, who may or may not have the expertise to make such decisions. More guidance needed centrally, and encouragement to do some longer forward thinking about issues like this.
7. Existing Activities (3.12) is a fair attempt at looking slightly more lenient, but I foresee that 'scrub cutting' could become a contentious issue around the boundaries of SNAs. And 'farming activities' recording for things such as this are a whole new ballgame for many farmers.
8. Biodiversity Compensation (Appendix 4) is a good try, but I can see it becoming a source of argument and court battles, particularly over items 8, 9 and 10 and Q36. And it never seems to cover who actually forks out cash (Central Government or Councils).
9. Q39 As I stated in 1 above, these things have to be clear for all parties. So, need to be clarified in both documents. And if it is farmers who will be expected to pay for it, there needs to be clarity over who messed up the wetland in the first place.
10. A New Zealand Biodiversity Strategy, carefully worded, would probably work better than regional ones. Putting such decisions in the hands of thousands of councillors and umpteen Councils is far too vague.
11. Q49 I take the view that climate change and its repercussions is racing up, and we need to get this sort of thing done and dusted as quickly as possible. So (a).
12. Q51 I opt for (b), public conservation land deemed as SNAs. Otherwise encroachments such as mining etc will continue.
13. Q58 All of (a) to (e).
14. Q55 I couldn't find the Section 32 Report and Cost Benefit Analysis, so can't comment on this.

