

10th March 2020

Submission on Proposed National Policy Statement for Indigenous Biodiversity.

Introduction

This submission has been prepared by [REDACTED] in conjunction with and on behalf of other Landowners in the [REDACTED] Rural area. A list of these landowners is at the end of this submission.

We oppose The NPSIB in its present form for the following reasons.

3.8 Mapping of SNAs.

1. We believe that 5 years is a very short period of time to identify SNAs, as we understand that there is a serious lack of expertise to map the whole country in that time frame, especially to do it accurately.
2. The criteria to identify SNAs seems very vague and open to interpretation of the ecologist's. We believe that only High Value indigenous biodiversity should be identified in collaboration with the landowner. It's better to look after a smaller area well than a large area poorly, especially with the lack of resources to protect and maintain these areas.

New Activities Within SNAs

To create new activities within SNAs will most likely become close to impossible or exceptionally expensive to adhere to all the red tape and requirements, rendering the land almost value less to the landowner. We believe this will effect Private Property Rights.

3.13 General Rules Outside SNAs.

1. How are Councils going to identify areas outside SNAs? Isn't this just creating a lot more work for councils and red tape and expenses for landowners.
2. In an area like the Hutt Valley where the land is already predominantly native vegetation, this will leave very little land available for future development of any type, including housing.

3.16-3.18 Restoration targets.

We believe that restoration of biodiversity on private land should be by supporting landowners on a non regulatory voluntary system.

Ways to help.

1. Cutting or removing compliance costs.
2. More certainty for the landowner on the remainder of their property.
3. Financial help for ecological farm plans.
4. Financial help for fencing, tree planting, pest and weed control.
5. Making the process to join the ETS easier and more rewarding, which in turn will make it more sustainable over all.

3.15 Mobile Fauna.

We see that this is also vague and will be exceptionally difficult to identify and monitor. The cost could be extremely expensive for councils . It would be better to get buy in from landowners as there will be much better results with community support.

Evaluation and Cost Benefit Evaluation.

We feel that parts of this NPS will put undue stress on District Councils when they are already struggling to stay on top of basic infrastructure.

We also feel the financial and psychological pressure on landowners is huge, especially with the new water policy to fence water ways as well , in this very uncertain time for the future of farming.

Surely this is a very serious Health and Safety concern for the well being of farmers and landowners.

Our Recommendations.

1. Remove identifying areas outside of SNAs
2. Just identify high value SNAs in collaboration with landowners .
3. Maximize the percentage of area a single landowner can have identified with out their consent.
4. Support landowners to protect and maintain high value SNAs.
5. Encourage and incentivise marginal land for landowners to restore indigenous biodiversity on their property.
6. Review the ETS so that in the future it will be more sustainable for landowners to include their marginal land in SNAs

Summary

Why not create a long term plan for the NZ landscape , waterways and indigenous biodiversity by consulting with Councils, Developers, Farmers, Forest Industries , Fire Dept , Maori , Public Groups etc , so we can all work and plan towards a more productive and sustainable future , instead of rushing through a poorly thought out NPS , that just penalizes those who have been improving Indigenous biodiversity on their property.

Only by empowering landowners and getting their support will you achieve your goal to be predator free by 2050 , improve waterways and restore Indigenous biodiversity to a healthy state. The carrot approach will always achieve far better long term results than the stick approach.

List of Submitters as follows

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

We would like to be heard in support of this submission if there is a hearing .

