



National Policy Statement for Indigenous Biodiversity Submission

March 2020

## **Opening Statement**

We are 6<sup>th</sup> generation farmers on our farming property. During that time, we have converted indigenous vegetation into farmland as was encouraged for the benefit of ourselves and our community through employment and landscape values. We are very conscious of our on-farm activities that affect indigenous biodiversity and follow best practise guidelines to minimise any adverse effects.

The proposal severely limits flexibility for landowners to manage their resources.

The West Coast should be exempt from the Indigenous Biodiversity NPS due to the vast area of public land already locked up in the Conservation Estate.

## **Summary**

Section 3.8 – Mapping

There needs to be a clear definition of significant, so that every little bit of bush isn't picked up.

Section 3.19 and 3.13

a. New Activities

This government talks a lot about fairness. New activities will be very difficult to do under the current proposal. Landowners should not be penalised for taking their time developing their land and should be compensated if they can no longer develop their land. If it is significantly important to New Zealand, then New Zealand must pay.

b. Existing Activities

Due to our climate, West Coast landowners face an ongoing battle as the bush continuously tries to take back over their land, this can make proving existing use difficult. Clearance is already covered in the RMA therefore doesn't need to be repeated in the NPSIB.

c. Rules outside SNA's - and Restoration Targets/Regional Biodiversity - 3.16 - 3.18

This can not apply to the West Coast as there is already considerable area unrated and locked up for Indigenous Biodiversity. There must be a Regional exemption.

Section 3.15 – Highly Mobile Fauna

Due to our vast area of unrateable land within the West Coast our Territorial Authorities don't have the fiscal ability to carryout MFE's surveying plan. We suggest MFE fund DOC, who have the expertise to carry out any Fauna surveying.

Section 32 – Evaluation and Cost Benefit Analysis

The Appendix C - Case Study Spatial Analysis is essentially a desk top exercise with significant short comings in terms of Cost benefit Analysis. Its focused at a regional level and does not attempt, at all, to show the "cost" to individual landowners of the loss of property rights that the current proposal will steal without any compensation. It mentions many times that the small blocks (<1ha) will require the landowner to cover the costs of manging adverse events with no attempt to quantify said costs. These costs are significant. They are loss of production, loss of land valuation due to lower production and reduced output with the transfer of productive land into restoration targets. Also not mentioned is the monitoring and pest control cost that Territorial Authorities will pass on to landowners, either directly or indirectly through rate increases.

[REDACTED]

[REDACTED]

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