12\textsuperscript{th} March 2020

Ministry for the Environment
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Wellington 6143

indigenousbiodiversity@mfe.govt.nz

Submission on proposed
National Policy Statement for Indigenous Biodiversity

1. I wish to thank the Ministry for the Environment (MfE) for the opportunity to make a submission on a proposed National Policy Statement for Indigenous Biodiversity (NPS-IB).

2. I support the intent of the NPS-IB however I have many concerns which need addressing to ensure the policies are workable and empowering.

3. The NPS-IB has no regard of the stewardship and ethos I have for managing the natural resource including indigenous biodiversity on [redacted] Farms. For many years [redacted] Farms has purposely on its own volition managed the habitat of indigenous biodiversity where it is found because of its recognisable value in the widest definition. This has involved but not limited to livestock exclusion, pest and weed control, new planting to infill etcetera all having incurred, and continues to do so, considerable expense in finance, time and other resources.

4. There is and has been no regard for the wherewithal of [redacted] Farms today and in the future to undertake the imposition and burden of protection and restoration of
indigenous biodiversity if directed to do so particularly regarding financial cost and time to implement

5. There is significant risk that the direction demanded by the NPS-IB will cause district and regional council to overreach which will incur open ended risk and uncertainty and this is unwarranted. This overreach could be incurred by, and not limited to:

- The mapping of SNAs
- The determination of SNA boundaries
- The hierarchical order of SNAs
- The identification of mobile fauna and habitat

6. There is significant risk that as a ratepayer the district and regional council will have to increase capacity to undertake their obligations as directed by the proposed NPS-IB. I have concern about the cost and the competency when the time to implement is restrictively and unnecessarily short.

7. For relief I urge you to reconsider the direction of the proposed NPS-IB considering the points raised above and those by other submitters namely BeefandLambNZ and Federated Farmers. I ask that you engage more constructively with local communities, so they become more empowered and receptive.

8. Attached is a photo of a ____ Ha stand of kahikatea trees and a ____ Ha stand of Manuka and Kanuka that have both been fenced off for approximately 15 years.

Thank you