Submission for National Policy Statement for Bio Diversity

I’m sorry but I’m away from my computer and can’t change the settings on this one, so hope the set out of my submission looks ok.

Firstly I'd like to say thank you for letting us (NZer's) have input into NPS

I am writing a submission on behalf of my family who are now 4th generation farmers, farming [redacted] in the Horizons Regional Council district.

We have read and discussed in depth the draft NPS statement to assess its effects to us personally as well as the effects of the wider community.

It is with some relief & pride to find that our own values & farming practices are very much aligned with NPS desire to protect & enhance the indigenous biodiversity that exists around us while enabling people to enjoy and prosper while living off the land.

The draft plan does have some parts which we oppose and feel need amending & wish to submit the following comments/changes

The following I feel are the areas in the Bio Diversity Statement which need re addressing.

**Clause 3.6 Precautionary Approach**

Opposed – as the wording/language is so broad/ambiguous

Most farmers activities have been tried & tested over many years/generations & their effects on indigenous biodiversity whether positive or negative or neutral are already known, therefore a need for a precautionary approach towards these activities is not required

Suggest – 3.6 should be cancelled

**Clause 3.7 Social and Cultural Wellbeing**

Opposed – Not needed as already in NZ law

As these points are recognised through other national law that says, policy should have no social effect on Farmers/Provincial NZ

**Clause 3.8 Identifying Significant national Areas**
Oppose – 3.8.2 needs to include

Suggest - Farmers should be allowed to employ a Terrestrial ecologist & have a management plan in place to assist & work with council using this information

Also needs to include the opportunity to appeal any decision & have an independent referee / arbitrator

**Clause 3.9** Managing effects on SNAs

Oppose – wording 3.9a “AVOIDING”

Suggest – wording should be changed to mitigate (to improve)

**Clause 3.12** – Existing Activities in SNA

Oppose – this whole clause is not fit for purpose because it does not tie in with 3.7, implementing 3.12 will have significant social and financial effects

Suggest – Cancel clause

**Clause 3.13** Surrounding areas

Oppose – It needs tightening as its open to severe abuse by local authorities

Suggest – needs strict guidelines designed to protect landowner

**Clause 3.15** Highly Mobile Fauna

Oppose – unworkable and impractical

How can you “Survey and record areas outside SNAs where highly mobile fauna have been or are likely to be sometimes present”

Suggest – cancel as unworkable and impracticl

**Clause 3.17** Increase Vegetation (10% RULE)

Oppose – as it is unfair urban and rural are treated differently and we have no idea what % authorities are going to put on rural areas

Suggest- should work as a community (urban & rural) to get vegetation cover, there should be no direct cost to landowners rural or urban, it should be a community cost.

Concluding, I would like to say that I would have done a cost analysis but the whole policy is so broad I have know idea where to start, but I can see it having a very devastating effect on provincial NZ, which is not inline with the Paris Accord, which was to look after the environment without having detrimental effect socially or economically.
I cannot fathom the work load councils are going to have it is unbelievable, how many people have traipsed around un tracked land in NZ on wild windy wet cold or stinking hot days? Not many. This policy needs 25 years to be implement, to have the staff and time. The time frame is unworkable.

Where are all the Terrestrial ecologists? They have to be kiwi trained as overseas ecologists have no idea about our fauna or farming systems.