
I am [redacted] from Central Otago, actively involved as a sheep, beef and raising of young dairy heifers.

My main impressions of this document are, that the projected implementation of the proposal as written, will fall far short of your statement.

It is dependant on copious rules, regulations and overbearing administration, that precludes Farmer inspiration.

It can demand that pre existing conditions be achieved, from before farm development took place. Do you actually understand the underling position of that farmer?

Generations of constant development have resulted in the developed farm of today, which still supports the farming Family, and is still relevant in today’s market place. It is very different from previous market opportunities and products raised. The international market scene determines the price paid for farm raised products, and farmers have to live by and respond to those signals, to ensure their survival.

I do not believe that farmers have willy nilly destroyed habitat. I believe that our response today is quite relevant, recognising that long term weather changes have been factored into todays farming calendar. Huge financial investments have been incorporated into todays systems, which produce products traded for foreign exchange, vital for every day survival of New Zealand.

I see this proposal as too broad and lacking specific attainable goals, instead going for the broad brush, no boundaries approach. This approach immediately causes uncertainty in farm planning, and naturally inhibits re investment on farm. The open ended unspecified costs, initially and through rates, has been glossed over. Yet you have acknowledged the overbearing oversight to be employed by regulatory authorities. Now determine the actual and lost opportunity costs.

And where does this document prevent undue and non relevant demands from being foisted on that farmer in this process? Where is the Farmers Right of Appeal? Or is it, co-operate at your cost on behalf of the public? Where is your social and economic assessment on landowners and rural communities?

Specific points.

4. c fragmentation or loss of buffering or connectivity within and between habitats or ecosystems.

Is that metres or kilometres? Oppose

4. h. disruption to indigenous fauna by People and their pets and livestock and changes that increase the risk of disruption.

Movement of ‘People and their pets‘ is discretionary, and cannot be treated as the equal of moving farmed livestock. If you inhibit the required movement of livestock, you immediately open that farmer to obligations under the animal welfare acts. Oppose.

3.5. providing for the maintenance of ecological integrity through natural adjustments to habitats and ecosystems.

If farming is not productive and profitable, these words have little relevance. Oppose.
3.6. “precautionary approach”
Yet again these words will encourage non approval of requested activities, despite change being necessary for market survival. And this precautionary approach could be triggered by an unrelated application.

3.7 e
This clause Has to have equality of outcome, not a top down demand.

3.8
This clause shall also include the appeal rights of landowners

3.12
Must not be used to prohibit farmers from responding to market signals.

3.13 As written this clause is open to mis interpretation to the detriment of the landowner, and may even encroach on a neighbouring property.
Oppose.

3.15
As written this clause could also prevent a change to farm systems required under other regulations, and market signals. Removal of trees to install a pivot irrigation system.

3.16
, but where reconstruction is “likely’ to result in that vegetation or habitat being regained.
What are the facts that would support open ended expenditure, and at whose cost ? Oppose.

3.17
This whole clause is based upon a pre determined percentage of the whole area, and is devoid of reality. Oppose.
All references to buffering areas, Oppose.
Appendix 3 c 14

Transparency of loss and gain calculations, Agree.
Thank you for the opportunity to submit on this proposal.