

Tabled at Hearing 26/02/2013

**Statement of:**

Mr Graham Reed

**In Support of:**

Combined Canterbury Provinces, Federated Farmers of New Zealand (320)

Banks Peninsula Branch of Federated Farmers North Canterbury (309)

Federated Farmers of New Zealand High Country (293)

**In the matter of:**

Submission on Proposed Canterbury Land and Water Regional Plan (2012)

Section 42A Report Volume 1 –Section 9 Wetlands, Vegetation and Soil

*Introduction*

My name is Graham Reed. My farm, the Grampians station in North Canterbury is 3200ha in area, of which approximately 1500ha is improved by topdressing or cultivation. Due to the high rainfall and fertility, improved areas are particularly prone to reverting to scrub and must be cleared periodically if they are to remain in grazing.

My statement is brief because I do not want to go over the same ground as Michael Bennett, Ray Maw and others – I anticipate questions however, because I have had significant input into Michael's work and have dealt with Ray for many years during his time at Environment Canterbury.

*Effects of the proposal*

High country farms are extensive and low intensity and we rely on burning as a low cost method to keep pasture clear. Without regular clearing of scrub it becomes unviable to top dress, after which scrub rapidly covers over completely and land goes out of production. Given the areas involved, rate of scrub regrowth, and low profitability of farming, our farm would be out of production within a generation if we could not burn.

On-going grazing and occasional burning is very beneficial in the suppression of wilding pines, a key environmental issue in the high country. Wilding pines spread in scrubby or lightly grazed country, but are unable to establish in our better grazing land. Burning has also been used by farmers that I know to remove wilding pines.

*The existing framework*

I personally put a great deal of work, time and energy into the old 'Burning Plan' framework, and object to it being dismissed as 'somewhat dated' in the section 32 report. The Burning Plan took 13 years to develop and involved extensive analysis and discussion of the adverse effects of burning and its key role in keeping the high country clear of scrub and wilding

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pinus. Environment Canterbury staff should know who we are and should have been able to consult with us efficiently and with little effort prior to notification of the Plan.

Instead, a plan that has been reported as 'working well' and accepted, despite initial concerns, as an effective balancing of environmental and other needs by agencies like the Department of Conservation has been withdrawn and substantially modified

One of the changes that has not been mentioned is that the Burning Plan included a definition of 'burning' that excluded small fires of less than 1 ha in area (also subject to the control of rural fire authorities). Burns of this scale, while possibly of interest from a biodiversity perspective, are appropriately controlled by the District Council under their roles and responsibilities under the RMA and as a fire authority. Very minor burns are not relevant to a regional water plan because as noted in the statements of Michael Bennett and Ray Maw, the risks to water quality and natural values of wetlands are trivial.

The 'Burning Plan' referred to 'average slope' as this enabled common sense in interpretation. The Land and Water Regional Plan refers to slope as an absolute, which I fear will lead to an excessively officious approach to enforcement, focusing on figures rather than actual environmental effect. I seek that references to 'slope' are amended to only refer to 'average slope'.

**Statement of:**

Mr Rob Stokes

**In Support of:**

Combined Canterbury Provinces, Federated Farmers of New Zealand (320)

Banks Peninsula Branch of Federated Farmers North Canterbury (309)

Federated Farmers of New Zealand High Country (293)

**In the matter of:**

Submission on Proposed Canterbury Land and Water Regional Plan (2012)

Section 42A Report Volume 1 –Section 9 Wetlands, Vegetation and Soil

*Introduction*

I farm Richon Station, a 7000 ha property in Lees Valley. 1800 ha of our land is in significant natural areas and is not farmed. 1700 ha is in cultivatable land, with the remainder in steep hill country.

Department of Conservation land mostly surrounds our farm. We have had many discussions with DoC staff over the years regarding the sustainability of burning as a land management tool and generally there had been an acceptance that there is little conflict with the purpose of conservation.

I support the statements of Michael Bennett and Ray Maw, and do not wish to go over the same ground. My statement is therefore brief, but I welcome questions from the hearing panel on my many years of experience using burning to manage land in the high country.

*Burning on Richon Station*

Burning is essential for farming in Lees Valley because our high rainfall means that grazing alone will not keep land clear of woody plant species.

Spraying by helicopter has reduced the need to burn because much of our issue is with matagouri which is susceptible to spray. Matagouri is not the only species we need to manage however, and we still need to burn at 10 yearly intervals to keep land in grazing.

*Environmental Effects*

The restrictions on timing of burning under the previous plan effectively control impacts because burns undertaken in winter/spring are of low intensity and easily controlled.

I believe that burning is environmentally beneficial because it maintains the land in a mixture of tussock, herbs, pasture, and scrub rather than just scrub. The comments of DoC staff over the years support this position.

In my many years of farming I have not noticed increased erosion in areas that are burned. If anything erosion is worse in areas that are not burned as ground cover is shaded out, stock are concentrated in some areas, scrub shelters wild pigs.

### *Conclusion*

In conclusion I support the submission of Federated Farmers and evidence presented by Michael Bennett, Ray Maw and my fellow farmers. There is no need to restrict burning of vegetation beyond the former 'Burning Plan'.

**Statement of:**

Mr Ross Ivey

**In Support of:**

Combined Canterbury Provinces, Federated Farmers of New Zealand (320)

Banks Peninsula Branch of Federated Farmers North Canterbury (309)

Federated Farmers of New Zealand High Country (293)

**In the matter of:**

Submission on Proposed Canterbury Land and Water Regional Plan (2012)

Section 42A Report Volume 1 –Section 9 Wetlands, Vegetation and Soil

***Introduction***

I farm Glentanner Station in South Canterbury. Glentanner sits on the shores of Lake Pukaki and has a northern boundary with Aoraki National Park.

My statement is brief because I see that the evidence of Michael Bennett (a high country farmer's perspective on the burning) and the expert evidence of Ray Maw provide a good description of the issue. I welcome questions on both of these statements, or any other aspect of high country land management that assists the hearing panel.

I wish to make additional comments on effects of land management fire and wilding pines – I will also refer to some pictures of Glentanner and nearby properties that support my statement.

***Effects of land management fire (burning)***

We undertake burning when soil moisture levels are high and frost is still in the ground in late winter to early spring, which results in only woody plant species being killed. The timing of the burn and also practices such as pre-burn spraying and burning uphill means that grasses and tussocks are affected very little, and recover rapidly. Reduced shading and moisture competition from woody plant species also supports the growth of tussocks, so is beneficial from an environmental and amenity perspective.

We also burn to a 'snow boundary', which prevents fire escaping into land above 900 metres, where it may damage delicate high altitude ecosystems.

Over the years we have been subject to a number of visits from Department of Conservation staff. We have had on-going positive feedback from this organisation, and in particular our balancing of production and conservation values.

### *Spread of wilding pines*

The high rainfall on Glentanner (1000 – 2500 mm per annum) means that our grasslands continually revert to woody scrub species, in particular wilding pines.

We have been able to manage wildings in open grassland, however we have observed rapid wilding spread on nearby properties where land has gone back to scrub and young seedlings are protected from grazing. Based on these experiences, I am certain that grazing, complemented by land management fire is necessary to maintain the extensive tussock grasslands of the Mackenzie Country.

I draw the hearing panel's attention to pictures of Glentanner Station and the neighbouring Mt Cook Station. Mt Cook Station has no burning and minimal grazing.

Land management fire is an important tool for maintaining our land in production. It is also more cost effective and I believe a lower impact management tool than use of chemicals or cultivation.

### *Conclusion*

I do not think that the changes to rules controlling the use of land management fire to clear woody vegetation have been sufficiently thought through, either in terms of actual risks to water quality or the consequences for high country farms.

The proposed changes will make it more difficult to manage regenerating scrub and wilding pines, will achieve little or no environmental benefit, and only hinder us in containing the spread of wilding pines and woody weed species on Glentanner, and I seek that it is withdrawn and replaced with a framework similar to the former Land and Vegetation Management Plan – Part IV (The Burning Plan).