

Tabled at Hearing 22/05/2013

Statement of:

Mr Robin Grigg

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 2

Introduction

From 1977 to 2011 I farmed Barrosa Station a high country property in Mid Canterbury. Barrosa includes areas of the highest category of rabbit prone-ness, similar to the worst parts of the Mackenzie Country. In spite of the intensity of the problem we have managed, by various methods, to control rabbits and farm successfully in this environment.

I have been involved with advocacy and governance in pest management for many years and was chairman of the Ashburton Pest Management Liaison Committee for three years. I also served two terms as trustee of the Ashburton Pest Destruction Board.

I have also had hands on experience and direct exposure to 1080 bait over my many years of farming with no ill effects that I am aware of.

Most of my experience in using aerial application of 1080 and pindone has been in the control of rabbits.

Much of my experience pre-dates the release of the RCD virus which has significantly reduced the proliferation of rabbits for the time being. Vast areas of the high country remain very rabbit prone however, and the RCD virus may only provide a temporary reprieve as resistance builds up in the population.

The nature of the problem

In my time at Barrosa we used various management tools to control rabbits. In spite of our best efforts using secondary control methods, we found that a blanket aerial poisoning operation was necessary approximately 1 in 6 years to prevent rabbits reaching unacceptable levels. Up to a third of the station might be poisoned in any one winter. We were fortunate in that the station has natural boundaries, including the Ashburton River which greatly reduced the rate of re-invasion and thus frequency of poisoning operations.

Much of the more extensively grazed native country on our property was in fact uneconomic to farm even with aerial poisoning operations, with costs not met by returns. The cost imbalance of farming this country would be even more severe today, were it not for the release of the RCD virus. As with many other stations, the most rabbit prone areas have now become Department of Conservation estate following tenure review. I believe it would be disastrous both for the high country land environment, and for occupants of neighboring properties if, through the imposition of regulation and cost, that the Department of Conservation were not able to carry out regular poisoning operations on their high country estate.

The Staff Recommendation on Rule 5.23

I am concerned about staff recommendations for Rule 5.23, which recommend removing the exception for *the wetted bed of a river, lake, or artificial watercourse that is more than 3 m wide*. This will effectively make it impossible to comply with the rule in most situations as aircraft undertaking pest control operations tend to fly across contour for safety reasons. Even if it were practical to meet these provisions, the 20 meter setback that is required would cover so much land, much of it scrub or regenerating forest that shelters rabbits and possums, that it would be impossible to achieve an effective kill.

The Global Consent/Discharge Permit

While in my role as Pest Management Liaison Chair I participated in the development of the 'Global Consent' to undertake aerial application of 1080 held by Environment Canterbury staff.

The Global Discharge Permit allows farmers to undertake aerial drops of 1080 and pindone with the permission of Environment Canterbury staff who hold the consent, and will ensure it is complied with. This makes sense in an administrative sense because it enables poisoning operations to be undertaken immediately when pest numbers reach trigger levels, while still ensuring Environment Canterbury are aware of the activity and giving the ability to decline permission to operate under it if necessary.

The global consent was driven by two challenges:

- The resource consent process is too slow to undertake poisoning operations in a timely fashion.
- Difficulty for Environment Canterbury staff to enforce the Regional Pest Management Strategy and thereby discharge their legislative responsibilities.

Resource consents to undertake aerial application of 1080 or pindone as a discretionary activity, take several months from preparation of an application, through to processing and issuing a decision. This time lag is impractical given that farmers are not aware that a poisoning operation will be needed until count results come back in February-March and poisoning must occur in May or June to achieve an effective kill. If the winter poisoning window is missed, an exponential growth of rabbit numbers occurs the following spring, with plague proportions reached over the summer. Severe economic loss, and widespread damage to vegetative cover and severe impact on the land environment are the inevitable result.

Another key driver of the global consent process was that Environment Canterbury Pest Management staff were greatly hindered in achieving statutory responsibilities. Being subject to strict consenting criteria, farmers were simply unable to act within the required window when served with an enforcement notice to undertake a poisoning operation to address an unacceptable proliferation of rabbits. Environment Canterbury staff were similarly restrained in intervening themselves.

Since the global discharge permit was issued on 24th March 2011, the global discharge permit has been activated three times, with four further farmers indicating that they have surrendered their resource consents with the intention to rely on it for future primary pest control operations¹.

In our governance role as pest liaison committee chairmen we were kept informed of the process of drafting the global consent application. We were made aware that DOC and LINZ had their own consenting processes, so agreed that the Crown land such as DOC estate and UCL land in riverbeds for example not be included in the application for consent. An unintended consequence was the development of a key limitation of the global discharge permit which is that it does not provide for applications to crown land, such as high country pastoral lease land. This is a critical limitation that means that some of our most rabbit prone areas are not provided for, even though aerial application of 1080 and pindone is critical to the sustainable management of these land environments².

Conclusion

In conclusion I see that aerial application of 1080 and pindone as intrinsically essential to on-going pastoral farming in Canterbury, and support the position of Federated Farmers that rules for this activity should be as enabling as possible given the benefits of the activity and minimal risk to surface water.

I oppose staff recommendations to remove the exception for water bodies less than 3 metres wide because they make Rule 5.23 impossible to comply with.

I also support the Department of Conservation, and the amended position of Federated Farmers that the aerial application of 1080 and pindone is best administered through a permitted activity in the Canterbury Land and Water Regional Plan.

Robin Grigg

May 2013

¹ Telephone conversation with Mr Graeme Sullivan at Environment Canterbury. 16-05-2013

² Telephone conversation with Mr Graeme Sullivan at Environment Canterbury. 16-05-2013

