

2 Tabled at Hearing 22/05/2013

Statement of:

Mr Jim Ward

In Support of:

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

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

My name is Jim Ward. I am the farm manager at Molesworth Station. Molesworth is a large high country station 182,000 hectares of land at an altitude of 2500 to 7500 feet. Aerial application of 1080, pindone is essential to continued farming of high country environments like Molesworth – without this tool we would not be able to farm here.

Prior to the commencement of poisoning operations in the 1960s, permanent rabbit infestation made Molesworth extremely degraded with major problems with soil loss and loss of biodiversity, and inability to farm economically. Since this time rabbit numbers have gradually been brought under control, and now a combination of effective use of 1080, other agents such as pindone, shooting and careful land management maintains the land in a much more desirable state in both an economic and environmental sense.

As well as rabbits, possums now pose a major threat to the sustainable operation of Molesworth as vectors for bovine TB. The entire station runs beef cattle, a management adaptation to the scale of Molesworth and to farming in this very harsh environment, and as is well known cattle are vulnerable to TB.

Scale and expense of poisoning operations in Molesworth

Our last major rabbit control operation used 200 tons of baited carrots and 500 tons of unbaited carrots for 'pre-feeding'. Carrots are no longer available in this quantity following the widespread conversion of horticultural land to grape growing, we no longer use 1080 to control rabbits and now use pindone.

1080 pellets continue to be used for control of possums, another serious pest. Molesworth has been closely involved with Landcare Research in the development of improved methods such as 'pulse feeding' to make better use of the toxin and achieve a 'better kill'. Using improved methods we have reduced our use from 4kg per hectare to 0.5kg per hectare, which in the overall context of Molesworth Station is a massive economic saving. Possum control operations using aerial application of 1080 is very costly and not to be undertaken lightly.

Consequences of recommended changes

The staff report recommends amending Rule 5.23 to make aerial application of 1080 and pindone subject to a 20 metre setback from any surface water body, regardless of size, or significance in the context of the catchment.

Taking the strictest interpretation of the RMA definition of 'water', many areas of dry riverbed, or dry creeks and gullies are considered waterways and are made subject to setbacks or exclusions. A 20 metre setback from these features covers a great deal of land, and will effectively make it impossible to carry out effective primary pest control operations under the administration of Rule 5.23.

In the past, exclusion of waterways, or setbacks from them for aerial application of 1080 on Molesworth Station have resulted in significant problems with incomplete kills or loss of efficacy. Loss of efficacy is very undesirable because the full benefits of the operation are not realized, target species become bait shy, and pest numbers recover quickly, all of which means that very costly aerial poisoning operations have to be repeated sooner than would otherwise be the case.

For example in one instance we were required to exclude a strip of land between a waterway and a road. It eventuated that this area had one of the highest possum densities within the control area and that a very costly control operation was significantly reduced in effectiveness. This was frustrating because an overly strict regulatory action to prevent effects on water quality resulted in wasted capital in a less effective operation, less protection for biodiversity. The original purpose of the restriction of protecting water quality was also defeated because we had to undertake another operation sooner than we would have had to otherwise.

The negative effects of setbacks from water will be amplified in future as farmers are encouraged or required to allow indigenous vegetation to grow back in riparian areas, which means these areas will be more likely to shelter pests. Once these areas become dominated with indigenous scrub and regenerating forest it will be more important than ever to be able to carry out extensive poisoning operations within them.

The result of the staff recommendation is that farmers wishing to carry out effective aerial poisoning operations will be forced to work through a discretionary activity under Rule 5.24. This will add considerable cost, complexity and delay, that appears to be unjustified by risks to water quality. This is particularly so on Molesworth, most of which is in the Clarence river catchment, which runs straight to the sea with little or no abstraction for drinking water downstream.

It would be much better in my opinion if aerial application of 1080 and pindone was administered through a simple permitted activity rule.

Conclusion

Aerial application of 1080 and pindone is essential to continued farming in Molesworth.

The staff recommended changes mean that this activity will be administered through Rule 5.24 which is a discretionary activity rule.

I support the position of the Department of Conservation and the amended position of Federated Farmers the most appropriate level of administration for aerial application of 1080 and pindone is a permitted activity rule.

Jim Ward

May 2013

