



A. Permission Application Number and Name of Applicant

91765-GRA Lone Star Farms Limited

B. Name of Proposed Activity and Location(s)

Grazing Puponga Farm Park, including lease of farm buildings

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	<p>Onetahua Restoration Partnership, comprising:</p> <ul style="list-style-type: none"> • Tasman Environmental Trust (TET) • Farewell Wharariki HealthPost Nature trust • Manawhenua ki Mohua (MKM) <p>Note: MKM's adoption of this submission is pending the next formal meeting of this group, after the submission deadline.</p>
Contact person and role of organisation	Sky Davies, Manager TET
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



A. Permission Application Number and Name of Applicant

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B. Name of Proposed Activity and Location(s)

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C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Sky Davies
Organisation	Onetahua Restoration Partnership
Date	3 November 2021

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Application Form 2a grazing:

- A. Description of Activity
- D Environmental Impact Assessment
- E Term

My reasons for my objection or submission are:

A Description of Activity

Grazing management description is limited to an annexed Draft Annual Farm Plan that relates to the year 2020/21 already completed, and does not provide any information on how the farm will be managed during the proposed 10 year new grazing period to 2031. It includes farm practices that are incompatible with conservation objectives. During the recent 2020/21 farm year these have included:

- Helicopter spraying of native vegetation, including young trees recently planted by volunteer groups
- Poorly maintained stock fences that have allowed cattle to enter into recently planted areas of native vegetation, resulting in partial loss of some plantings. Farm management has been slow to repair fences in these critical areas
- Fertilizer applications in paddocks that drain into wetlands, contaminating ecosystems where indigenous fish (including giant kokopu) are extant.

D Environmental Impact Assessment

The application fails to consider:

- Biodiversity: how farm management should be sensitive to the biodiversity that currently exists in the farm park including lizards e.g. Nelson green geckos, remnant mainland colony of sooty shearwaters at Fossil Point, native fish across wetland areas and lakes, and native flora (especially salt turf habitat at Greenlands).
- HealthPost Nature Trust Ecosanctuary: farm management in the halo area around the Cape Farewell Ecosanctuary should be sensitive to the likelihood that, over the 10 year period, overflow populations from the fenced area could expand into areas that are currently grazed.
- Onetahua Restoration Predator Free 2050 eradication project for an area that includes the Farm Park. How will farming practices take into account the eradication process between 2022 and 2025 (including possible use of toxins for initial knockdown) and the subsequent defence of predator free status (2025 - 31). What arrangements will need to be made to work with the Onetahua Restoration Project and DOC to see this through to success? What issues does the eradication process pose to farm management during this period and how can they be addressed?
- The "wetlands, waterways and other areas" special feature that is included in this section of the application only covers fencing off or retiring areas from stock, and does not address wider issues of contamination from fertilizer or pesticide applications.

E. Term

A 10 year term is proposed, but the application does not include a management plan for this period (as required in the application form). The Draft Annual Farm Plan that is included (Appendix 2a) relates only the year prior to the application. Given this omission, there is no justification provided for the 10 year period included in the application.

(Note: although the draft annual farm plan is undated, the text in the section "Weeds – Rushes" on page 3 cites an activity "to do in May/June 2020" indicating that it was prepared prior to this date, for activities undertaken in the 2020/21 farm year).

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The Onetahua Restoration Partnership recognises that Lonestar farms has a history of cooperation and collaboration to enable recreational activities to take place alongside farming work. The Onetahua Restoration Partnership that has been formed between HealthPost Nature Trust, Manawhenua ki Mohua and Tasman Environmental Trust represents a new conservation-oriented initiative for an area that includes the Puponga Farm Park (see Attachment). This builds on work undertaken by the HealthPost Nature Trust in the Farm Park since 2017. The new partnership has recently initiated a Predator Eradication project supported by PF2050 Ltd. This is currently in the process of feasibility assessment. For the Puponga Farm Park, this presents an opportunity for The Onetahua Restoration Partnership and Lonestar Farms, together with DOC and the wider Golden Bay community, to demonstrate that significant conservation gains can be achieved if farming practices, predator eradication and ecological restoration are planned collaboratively with the issues of importance for all parties recognised and incorporated into realistic and achievable plans.

The Onetahua Restoration Partnership therefore proposes that:

- The current licence/lease be rolled over for a 12-month period from the end of the previous 10 year term i.e. to June 30, 2022.
- A working party comprising representatives of Lonestar Farms and Onetahua Restoration Partnership be formed, that will describe the impacts, costs and benefits of the proposed predator eradication project for the farm park (based on the feasibility and operational predator eradication plans for the project area).
- A revised grazing arrangement is then agreed by June 30, 2022, with full knowledge of the implications of the proposed predator eradication project, based on a forward-looking farm plan and a comprehensive environmental impact assessment that is compatible with the predator eradication/conservation, recreational and farming objectives of the farm park (and DOC).

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Onetahua Restoration Partnership Brief v3	Word (docx)	Overview of the Onetahua Restoration Partnership and predator eradication project that includes Puponga Farm Park within the project area

How do I submit my objection or submission?

Complete this form and email to permissionshokitika@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Attn: Lucy Croft, Private Bag 701, Hokitika 7810

Onetahua Restoration Partnership: Predator Free 2050 Ltd. project for predator eradication

Onetahua Restoration is a long-term ecological restoration initiative proposed for the Farewell Spit/Wharariki/Pakawau area in NW Tasman district. It is based on a partnership between the Tasman Environmental Trust (TET), Manawhenua ki Mohua (MKM) and the Farewell Wharariki HealthPost Nature Trust (Nature Trust). TET supports “within the Tasman community the appreciation, protection, maintenance and restoration of Tasman’s distinctive natural environments”, while the Nature Trust was established to create ‘significant conservation projects that have real impact on the conservation values of Farewell Spit, Wharariki and environs’. Manawhenua Ki Mohua is an iwi mandated organisation representing Ngati Tama, Ngati Rārua and Te Ātiawa within the area defined as the Golden Bay catchment and Kahurangi National Park area.

Eradication of introduced predators is a critical initial component of any ecological restoration programme in New Zealand. Predator Free 2050 Ltd, is supporting Onetahua Restoration through a grant agreement with TET for the Onetahua Restoration Partnership to carry out “*a programme of predator elimination, supported by associated research and development and community engagement to completely remove possums, rats, mustelids and feral pigs from Farewell Spit to a boundary determined by mutual agreement based on the results of the feasibility study*”. The grant agreement envisages an initial year (to June 2022) to complete a feasibility study and (if positive) develop an operational plan based on this. Eradication will take place over the succeeding three years, to June 2025, with a final year to monitor and defend the predator-free status, before this becomes the responsibility of the local partners and community. Predator Free 2050 Ltd. has provided an initial \$250,000 for feasibility stage, with additional funding dependent upon a positive feasibility report, and co-funding being secured (on a 2:1 basis) for up to \$3 million total grant.

A Steering Group to guide and advise project implementation has been constituted, and includes key partners including the Department of Conservation, Tasman District Council, and a Federated Farmers/local community representative.

The project is ambitious as no-one has ever managed to completely remove possums, rats, mustelids and feral pigs from such a large and dynamic sand dune environment with extensive adjoining tidal flats. This Project will need to adopt and trial new and emerging technologies and methodologies. Consequently, there are many uncertainties about how well current and new techniques to remove predators will work and how long they will take to apply. In addition, the appetite of the community and individuals to support those techniques is still largely untested, along with the uncertainties created by COVID-19, extreme weather events and episodic masting seed events.

The project is funded using Jobs for Nature financing, so that employment creation during the eradication process, and thereafter, is an important consideration for all involved.

The Onetahua Restoration project area

This comprises nearly 12,000ha in the northernmost peninsula of the South Island (see map). The southern boundary of this area is the Westhaven/Whanganui Inlet Road that cross the peninsula and separates Pakawau Forest from the rest of Kahurangi. The area includes DOC managed conservation estate and private land as follows:

Conservation estate:

- Farewell Spit Nature Reserve (2,900ha), an internationally recognised Ramsar site. The reserve also includes 8,000ha of tidal mudflats (seagrass habitat)
- Puponga Farm Park (1,200ha) currently leased to Lonestar Farms (under renewal)
- Kaihoka Scenic Reserve (60ha)
- Pakawau Forest, a northern extension of Kahurangi National Park (4,300ha)

Private land and businesses:

- Three farms west of Pakawau Forest
- Farms, smallholdings and baches to the east of Pakawau Forest, including Puponga settlement.
- Farewell Spit ecotours operates a DOC concession for tours on the spit (beyond the public access area), and also collaborates with predator trapping and wider ecological restoration activities.
- A camp site operates at Wharariki in an enclave of private land within the Farm Park.
- Other business including horse trekking and cockle processing.

Biodiversity and conservation values

Farewell Spit is the NZ's longest sand spit (25 km), with public access restricted to the first 4km only. It is an internationally-renowned Ramsar wetland and site for shorebirds and migratory seabirds with over 90 bird species recorded, including red knot, bar-tailed godwit, variable oystercatcher, pied oystercatcher, and banded dotterel. This Shorebird Flyway Reserve Network Site is one of the most extensive protected areas of mobile and stable dune habitat nationally. A 2013 survey found that Farewell Spit regularly supports 20,000 or more waterbirds.

Farewell Spit/Wharariki was ranked as the number one priority in a 2019 ecosystem ranking exercise for the Tasman district. The study highlights the significant dune and coastal ecosystem cover, including coastal species of grassland and sedgeland, searush, herbfields, shell barrier beach and saltmarsh. It includes 7 ecosystem types, including nationally rare dune vegetation and Threatened and At Risk species including the katipo spider. A Bioblitz held in 2019 reported a rich invertebrate ecology in the wetland areas along the spit. The inter-tidal area (8,000ha) contains the largest seagrass habitat area in New Zealand (25% of the national total).

Puponga Farm Park (Wharariki area). The cliffs running West of Farewell Spit formerly contained colonies of burrowing seabirds, which are now restricted to offshore islands (Tunnel Island) and mainland remnants (Fossil Point). The recently established Ecosanctuary at Cape Farewell will be the site of future seabird re-introductions. Intensive predator trapping across 8 traplines run by local volunteers across the farm park is underway to facilitate halo effects over time. The Farm Park contains several lakes and wetland areas (now fenced, and with wider restoration potential) where indigenous fish (giant kokupo) are found, and pateke introductions are planned. Stream and wetland areas, and the Ecosanctuary, have been the focus on native vegetation planting efforts by the Nature Trust over the last 4 years. The Puponga "badlands" in the Old Man Range are an area of infertile conglomerate in the very north with habitat for orchids such as *Pterostylus puberula*. There are salt turf communities in the Greenhills area that provide habitat for rare plants such as *Lepidium oleracium*, *flexicaule* and *Mazus nz* and the nationally vulnerable broom *Charmachelia juncea*. The entire area is habitat for the Nelson Green gecko. The park also contains a snail (*Powelliphanta g. subfusca*) and a rare pimelia moth (*P. ignota*).

Pakawau Forest: is a lowland forest with spot heights around 300m to the north of the Wakamarama Range. This bush is separated from the sea by the Farm Park and the three private

farms to the west. There is no continuous cline from the mountains to the sea. The forest is dominated by rimu, southern rata and hard beech. Low stature manuka scrub dominates the north-east and conifer-broadleaved forest are present at low elevation in the south. *Powelliphanta gilliesi subfusca* is now confined to isolated, mostly small forest remnants around Kaihoka Lakes, Greenhills Stream, Oyster Point and Mt Lunar, and in the NW edge of the cutover Pakawau Forest.

Kaihoka Lakes: is a remnant lowland dune forest consisting of podocarp broadleaf species that offers the most significant habitat for the critically threatened land snail *Powelliphanta g. subfusca* that once occupied all of the coastal forests of NW Nelson.

Predators and pests

Farewell Spit: possums, mustelids and rats are widespread throughout the spit. Pigs are also present, although culling (DOC) reduces density periodically. Hares are ubiquitous, damage both native vegetation and new plantings, and remain unmanaged. DOC undertakes weed control (*Spartina*, etc). Invasive Asian paper wasps are a recent arrival on the spit, and are the subject of an MSc. research project from Victoria University, Wellington with the Nature Trust. DOC reports deer as “almost eradicated” from the area.

Pakawau Forest, Kaihoka Lakes and Puponga Farm Park: in addition to possums, mustelids and rats, goats are abundant throughout the area, reinvading from farmland when under control in the forest. Wilding pine control is undertaken in the Farm Park (Badlands area). Pigs are present. The salt turf ecosystem at Greenhills suffers from browsing by hares and cattle trampling. Predation by rats, thrushes and hedgehogs are threats to the *Powelliphanta* snails across the area.





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Grazing Puponga Farm Park, including lease of farm buildings

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Golden Bay Province of Federated Farmers
Contact person and role of organisation	[REDACTED]
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

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Printed name of submitter or person authorised on behalf of submitter	[REDACTED]
Organisation	Golden Bay Province of Federated Farmers
Date	3 November 2021

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The whole application

My reasons for my objection or submission are:

We support the proposal for the continued grazing lease/licence of Puponga Farm Park by Lone Star Farms Limited.

They have leased this property since 1998 and in that time have carefully and successfully balanced a productive farming operation in a significant and delicate ecosystem.

Lone Star Farms has rightfully earned its reputation as a good employer and contributes to a thriving local economy, vital in a small community such as Golden Bay. This contribution is not only monetary, but also socially and educationally. As Puponga is accessible to the public, the sharing of farming knowledge to Farewell Spit visitors helps educate people that farming and conservation can work together.

The continued operation of the grazing lease renews these successes, and enables the continuing protection of the Spit in different ways ie from acting as a fire break for the Reserve to being a buffer zone for pest and weeds.

By actively grazing Puponga Farm Park, the potential fuel loading for a wildfire is controlled and reduces the risk from the only adjacent land area to the Reserve. The leasee is responsible for controlling weeds and pests, which reduces the financial and labour input required from DoC. The operational details regarding chemicals used, timing of applications etc is specified in the annual plan.

The benefits from Puponga Farm Park are referred to in the RAMSAR wetlands information sheet about the Farewell Spit Reserve namely:

18. Current land use: principal human activities in:

(b) surrounding/catchments: Puponga is run as a farm park with access to the public. The primary objective of farm park management is to protect the Spit.

19. Disturbances/threats, including changes in land use and major development projects: (factors which may have a negative impact on the ecological character of the wetland)

(b) in the surroundings/catchment: Fire is also a major potential threat, especially with the strong winds known from the area in summer.

16. Conservation measures taken: (national category and legal status of protected areas - including any boundary changes which have been made; management practices; whether an officially approved management plan exists and whether it has been implemented)

(a) protected areas: Farewell Spit (i.e. the entire sandspit) is Crown land, status Nature Reserve, with public entry by permit only. Tourist traffic to the lighthouse is tightly controlled. The Nature Reserve status recognised Farewell Spit's outstanding values. It has been a protected area since 1938 when almost all the land (1,961ha) above high-tide level was set apart as a Flora and Fauna Reserve, and the area uncovered at low tide (then 9,360ha) was set aside as a Sanctuary for the Preservation of Wildlife. Adjoining land is Crown land - Puponga Farm Park which is a gazetted Recreation Reserve, and is the only adjacent land area.

(b) other measures: It is also listed under the Ramsar Convention (a convention of wetlands of international importance especially as waterfowl habitat) on 13 August 1976. The management plan for the nature reserve was revised in 1990, this plan covers both the nature reserve and the adjoining farm park (Farewell Spit Nature Reserve and Puponga Farm Park Management Plan January 1990).

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

No change required to the current conditions

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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Grazing Puponga Farm Park, including lease of farm buildings

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Farewell Wharariki HealthPost NatureTrust
Contact person and role of organisation	Peter Butler, Board of Trustees Chair
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

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Printed name of submitter or person authorised on behalf of submitter	Peter Butler
Organisation	Farewell Wharariki HealthPost Nature Trust which has an MOU and Community Agreement with DOC covering Puponga Farm Park
Date	5/11/2021

D. Statement of Support, Neutrality or Opposition

- I Support this Application (I am making a submission)
- I am Neutral on this Application (I am making a submission).
- I Oppose this Application (I am making an objection).

E. Hearing Request

- I Do Not wish to be heard in support of this objection or submission at a hearing.
- I Do wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Our organisation supports this application in principle because we know Lonestar Farms are generally good operators and the owner has a good heart for conservation.

The specific parts we would like to address are:

Aerial herbicide spraying

Cattle grazing wetlands

Fertilizer application

Length of lease

Endangered species protection and reintroduction

Onetahua Restoration Project

My reasons for my objection or submission are:

Aerial herbicide spraying.

Significant areas of predominantly kanuka forest were killed by aerial spraying earlier this year. This is particularly frustrating given our Nature Trust has spent several years been planting 1000s of native trees in the wetlands and conservation sensitive areas through the Farm Park. We note the Draft Annual Plan Lonestar has submitted documents the intention to keep helicopter spraying and it appears this has been subsidised to the tune of \$5000 by DOC!

Cattle grazing wetlands

Lonestar has up until recently has cattle grazing in the wetlands that have been fenced off from the larger Wharariki Wetland. That these paddocks are in fact 'wetlands' was confirmed during a site visit earlier this year by myself, Andrew Lamason and TDC wetland ecology specialist, Jeroen Lurling. Although the area for grazing cattle has been reduced in plan F of the Concession application the lower half of the area marked X on our attachment is also part of the natural wetland and as such should not be grazed by cattle. Nature Trust's bioblitz a couple of years ago established that Wharariki wetlands is a hot spot for giant kokapu. Wetlands need enhancing not grazing impact, and DOC should be setting an example on its own land.

Fertilizer application

Most fertilizer application in the farm park will have an impact on the wetlands or adjacent coastal habitat and we note that draft farm plan that has been submitted includes urea, which is well documented to cause eutrophication. There will be considerable N going into the water and sea already from animal excretion.

Length of lease

We believe 10 years is too long for a lease in this area given the Onetahua Restoration project and our own Nature Trust work are likely to have a significant effect on the conservation value of Puponga Farm Park. We believe Puponga Farm can become a showpiece for conservation and farming working hand in hand and this is more likely to be achieved by regular reviews of the lease than by a 'set and forget' 10 year arrangement.

Endangered species protection and reintroduction

In January 2022 Nature Trust expects to reintroduce fluttering shearwater to the mainland of the South Island at the Ecosanctuary we have built at Cape Farewell. We expect this will be the first of several reintroductions and believe the lease document needs to formally acknowledge this parallel development within Puponga Farm Park, as well as mandating protection of Nelson green gecko habitat (an identified site was aerial sprayed) and other biodiversity hotspots as they are identified.

Onetahua Restoration Project

Nature Trust is a partner in this very ambitious, multimillion dollar project with huge potential for biodiversity gains should the feasibility study and fund raising give it the go ahead. For example DOC's shore bird expert Graeme Taylor has identified Farewell Spit as NZ's premier site for the reintroduction of endangered shore nesting seabird, if it can be made predator free. This can only be achieved by Onetahua Restoration being able to deploy landscape predator eradication across the Farm Park, especially Triangle flat at the base of the Spit.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Aerial herbicide spraying should not be allowed in the new lease.

The bottom half of the paddock marked X in the attachment should be added to the areas shaded in blue for 'sheep grazing only'.

Urea should not be allowed to be used on the farm park and there should be a sinking lid on the use of other fertilizers.

The lease should be for 3 years not 10 years

A conservation clause should be added to the lease which requires the leasee to work constructively with Nature Trust efforts to enhance the biodiversity of the Farm Park

A clause should be added to the lease which requires the leasee to work constructively with Onetahua Restoration Project for a successful predator eradication across the Farm Park

G. Attachments

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Lease submission map F		Area of wetland to be added to sheep grazing only
Sprayed kanuka forest		Representative picture near old woolshed

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Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Inger Perkins
Contact person and role of organisation	
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	
Phone/Mobile	[REDACTED]
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Printed name of submitter or person authorised on behalf of submitter	Inger Perkins
Organisation	
Date	7/11/2021

D. Statement of Support, Neutrality or Opposition

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F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Puponga Farm Park is a Recreation Reserve under s17 of the Reserves Act 1977. The purpose of the reserve, in addition to providing for recreation, is to protect "the natural environment and beauty of the countryside". In addition, "where scenic, historic, archaeological, biological, geological, or other scientific features or indigenous flora or fauna or wildlife are present on the reserve, those features or that flora or fauna or wildlife shall be managed and protected to the extent compatible with the principal or primary purpose of the reserve". Providing for recreation is the primary purpose of the reserve, closely followed by the protection of natural or historic values. Section 17 includes, at sub section (c), the requirement that the "qualities of the reserve which contribute to the pleasantness, harmony, and cohesion of the natural environment and to the better use and enjoyment of the reserve shall be conserved". Thus, in my view, grazing has contributed to the pleasantness of the land here and enables better use and enjoyment of that land by the public for recreation. However, it is critical that grazing does not adversely affect indigenous flora or fauna.

I understand that Lonestar Farms are generally good operators, and the owner is interested in conservation.

The open grazed areas are as much a feature and attraction of this location as are the cliffs, dunes, beaches and wetlands. They enhance recreation opportunities.

Any licence renewal presents an opportunity to review the operation, review compliance reports, consider how the activity fits within the specific conservation area with fresh eyes and consider where conditions can be updated to reflect the conservation values of the location and, importantly, the time in which we find ourselves, confronted as we are with the climate and biodiversity crises.

I understand there have been some issues relating to compliance or activities that do not fit in this area, significant for its habitats, flora and fauna. These include aerial herbicide spraying of native vegetation, cattle grazing wetlands and application of fertiliser that may be adversely affecting water bodies.

This is an opportunity to review conditions, define consequences for breaching conditions, and ensure that any new lease fits within the biodiversity and recreation needs of this special area.

With the establishment of the Onetahua Restoration Project and the Nature Trust, including endangered species protection and reintroduction since the licence was last issued, it will be important to ensure that the licence is re-issued in such a way as to enhance and protect conservation and biodiversity values and projects.

This is an opportunity to ensure that all those who work on the Puponga Farm are familiar with the values of the area and the conditions of the new licence, ideally through some engagement with or coaching of all staff and contractors, showing them the wildlife that is under threat for example, to ensure a clear understanding is achieved and to bring them on board with the reasons for conditions. Early engagement may also enable them to define conditions that are both practical and achieve greater conservation outcomes.

My reasons for my objection or submission are:

Aerial herbicide spraying.

I am told that significant areas of predominantly kanuka forest were killed by aerial spraying earlier this year, including Nelson green gecko habitat. If aerial spraying cannot be undertaken without keeping spray and or spray drift within agreed areas, it needs to be discontinued and alternative methods found.

Cattle grazing wetlands

Any areas identified as wetlands by DOC and or TDC must be excluded from the licence and fenced by the applicant. It is not appropriate for DOC to allow wetlands on land it manages to be grazed. DOC could work with the applicant not only to protect wetlands but also to enhance them, joining forces with the Farewell Wharariki HealthPost NatureTrust.

Fertiliser application

Any fertiliser application in the farm park is likely to have an impact on the wetlands or adjacent coastal habitat. Any run-off of nitrogen into these areas will adversely affect the freshwater habitat and probably the marine coastal habitat too. Before any approval is given for the application of fertiliser, there needs to be independent assessment of any run-off issues arising from animal urine and faeces. If adverse effects on water bodies are found, appropriate actions will need to be agreed to minimise the risk, for example through greater buffers and planting those buffers. If contaminated run-off cannot be prevented, application of fertiliser would not be appropriate and it is likely that stocking rates will need to be reduced.

Length of lease

With the greater appreciation of the natural values of this area and the restoration projects underway, the re-issue is not only an opportunity for a re-set, but also a review of how it works. This is an unusual site where conservation is progressing apace in and around a huge farming operation.

It would be appropriate to build in some flexibility to review regularly, whether every 1, 2 or 3 years, and alter conditions as necessary. Alternatively, a shorter term of lease, say three years, would be best.

This is a superb opportunity to connect farm, restoration projects, conservation trusts, council and DOC for the best possible outcomes, creating a showcase of sustainable farming working successfully alongside conservation, provided that there is ongoing collaboration by all involved and any necessary support to make it work, with clear vision and goals. Biodiversity opportunities abound to protect endangered species, with the support of Nature Trust, and these opportunities can only be seized if conditions to support it, including predator control, are included within a new licence.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Appropriate conditions need to be included in a new licence that prevent any risk of adverse effects on biodiversity and support and enable the growing restoration projects.

If aerial herbicide spraying cannot be contained within agreed grazed areas, it should not be allowed.

Any areas identified as wetlands to be fenced and removed from grazing.

Independent assessment of current farm run-off to be undertaken and, if required, conditions included to reduce levels of nitrates reaching water bodies, including increasing buffer areas from watercourses, planting buffers, not allowing fertiliser application.

Build in some flexibility to ensure that the licence and operation is reviewed regularly, whether every 1, 2 or 3 years, and alter conditions as necessary. Alternatively, a shorter term of lease, say three years, would be best.

Conditions to include engagement and collaboration with Nature Trust, Onetahua Restoration Project, DOC and TDC that enable and require the applicant and all those employed or contracted by the applicant to work constructively with those groups/agencies to enhance the biodiversity of the Farm Park through whatever means are appropriate, including inductions for staff, predator control, restoration, fencing ...

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do i submit my objection or submission?

Complete this form and email to permissionshokitika@doc.govt.nz . You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Attn: Lucy Croft, Private Bag 701, Hokitika 7810

OBJECTION OR SUBMISSION FORM

Publicly notified application for leases, licences, permits, or easements.



Department of
Conservation
Te Papa Atawhai

New Zealand Government

This form is to be used to provide objections or submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

How do I make an objection or submission?

- Complete this form.

Note: DOC encourages electronic objection and submission forms (e.g. a typed word document).

- If you require additional space, attach or include extra documents and label them according to the relevant section. Record the document details in section **G Attachments**.
- Email your completed objection or submission and any attachments to permissionshokitika@doc.govt.nz. You may also mail your objection or submission to: Director-General, c/o Department of Conservation, Attn: Lucy Croft, Private Bag 701, Hokitika 7810

Closing date of objections or submissions

The closing date and time for sending objections or submissions to the Director-General on this matter is 8 November 2021.

Privacy:

Note that objections or submissions are public documents. Your name and objection or submission will be included in documents that are available to the media and the public.

The Department will deal with any personal information you supply in your objection or submission in accordance with the Privacy Act 1993. The Department will only use your contact details for the purposes of processing the notified permissions application that it relates to (or in exceptional circumstances for other reasons permitted under the Privacy Act 1993).

Where your objection or submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box on page two.

Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this objection or submission.

The Department is likely to post your objection or submission on its website at www.doc.govt.nz. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act.

DO NOT SEND THIS PAGE WITH YOUR OBJECTION OR SUBMISSION



A. Permission Application Number and Name of Applicant

91765-GRA Lone Star Farms Limited

B. Name of Proposed Activity and Location(s)

Grazing Puponga Farm Park, including lease of farm buildings

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Alec Milne
Contact person and role of organisation	self
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



A. Permission Application Number and Name of Applicant

91765-GRA Lone Star Farms Limited

B. Name of Proposed Activity and Location(s)

Grazing Puponga Farm Park, including lease of farm buildings

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Alec Milne

Organisation

Date

24/10/2021

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Principles of the lease

My reasons for my objection or submission are:

There will be both common and conflicting interests between the farming operation and the growing conservation aspirations for the farmpark. And given the length of tenure (the last lease went on for 20+ yrs), unforeseen conflicts of interest are bound to arise in the future.

It is critically important that conservation takes priority whenever a conflict of interest arises and also that this priority is not at the lessees expense i.e the annual lease value must allow flexibility to cater for conservation initiatives which reduce financial returns to the lessee.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

- 1/ Clearly embody the above principles in the lease document
- 2/ Fencing: The old adage that 'good fences make good neighbours' has a sound basis and is a key area to address in minimising conflict between farming and conservation values. I believe this part of the lease is best addressed with a specific clause where the internal and external boundary fences are maintained annually by an independent fencing contractor and this cost is recognized as part of the lease value.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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Attn: Ms Lucy Croft
Department of Conservation
Private Bag 701
Hokitika 7810
permissionshokitika@doc.govt.nz



Cc: Nelson Marlborough Conservation Board

1 November 2021

Dear Sir / Madam,

Submission on the application for a lease/licence by Lone Star Farms Ltd (91765-GRA)

Federated Mountain Clubs was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of over 21,000 members in 99 clubs. Our organisation has a strong interest in the intrinsic values that make New Zealand's great outdoors such a special place.

FMC objects to this application on the grounds that the information supplied is inadequate and insufficient cognisance is taken of the climate and biodiversity crises that Aotearoa New Zealand is facing.

We would like to acknowledge the enlightened and permissive attitude Lone Star Farms have toward public access, specifically allowing access all year. Similarly, we wish to acknowledge the good work that Lone Star Farms do within the Golden Bay community including a \$100,000 donation to Healthpost toward predator fencing the Wharariki Ecosanctuary. We are also aware of the role the farm plays as a firebreak protecting Farewell Spit.

Before discussing the details of the application, it is important to establish the wider national and international environmental contexts in which this application is taking place.

Climate Change

The International Panel on Climate Change's Sixth Assessment Report, 2021¹ makes it very clear that the world is facing unprecedented climate change associated threats and Aotearoa New Zealand's precious flora and fauna are vulnerable to escalating temperatures and sea levels. As noted by a senior scientist at Manaaki Whenua Landcare Research, Dr Nick Cradock-Henry: *IPCC's Sixth Assessment is "a stark reminder of the need for adaptation. Adaptation will require strategic and even radical adjustments to practices, processes, capital and infrastructure in response to climate change, and must begin now."*⁹ If that process of strategic and perhaps radical adjustment cannot take place on public conservation land then how do we expect it to occur on private farmland and in our cities?

Biodiversity

The International Science-Policy Platform on Biodiversity and Ecosystem System Services, 2019² identifies that our world is facing a global nature crisis and that it *"is not too late to make a difference, but only if we*

start now at every level from local to global. Through transformative change, nature can still be conserved, restored and used sustainably."

Here in New Zealand the Te Mana o te Taiao, New Zealand Biodiversity Strategy 2020 ³ acknowledges that *"Despite our best efforts to turn the tide, biodiversity loss is still happening in Aotearoa New Zealand."* And that *"We now have the opportunity to be bold and make some big changes to how we interact with nature and biodiversity."*

Within Te Mana o te Taiao, New Zealand Biodiversity Strategy, the Tiaka me te whakahaumanu, protecting and restoring section states: *"We need to address the direct pressures causing a decline in biodiversity, ensure the sustainable use of biodiversity, and restore biodiversity in areas where it has been lost. These objectives set out what we will do to ensure biodiversity is resilient and secure."* One of the 2050 objectives in the strategy is that *"Ecosystems and species are protected, restored, resilient and connected from mountain tops to ocean depths"*. A great deal of emphasis is placed on restoration and protection. Again, if that process of restoration and protection cannot take place on public conservation land then how do we expect it to occur on private farmland and in our cities?

Our objections to the granting of lease/licence

The information supplied is inadequate

The applicant wishes to occupy public conservation land for a decade. The Nelson/Marlborough Conservation Strategy⁶ was written in 1996 and the Farewell Spit Nature Reserve and Puponga Farm Park Management Plan was written in 1990⁵ – so referral to these documents is of no great assistance in 2021. The consideration of environmental effects contains no details of the current conservation and ecological values of the area and no detailed proposals of how the proposed operation will conserve and preserve these values. A Department of Conservation brochure⁷ outlines some of the landscape, wildlife and vegetation values present in the area – none of which are adequately addressed in the environmental impact assessment. Recent studies⁸ have highlighted the importance of wetlands as sequesters of carbon; Farewell Spit is internationally recognised through a RAMSAR designation, yet there is no mention of wetlands in the environmental impact assessment and no mention in any of the literature of a setback to prevent grazing cattle from damaging such wetlands.

Any consideration of a ten-year occupation of this public land should have at least some examination of the alternative societal benefits that may arise through the revegetation and rehabilitation of the land in question.

Cattle grazing is an inappropriate use of the area

Much of the area covered by the application consists of coastal turfs. In a DOC paper⁴ describing such turfs Geoff Rodgers points out the contrasts between the comparatively intact pasture impacted by sheep and the heavily fragmented surfaces arising from cattle grazing. The paper further outlines the differences between grazing sheep and cattle on this land:

- *"Cattle are largely incompatible with the maintenance of intact turfs on wetter substrates, but sheep appear complementary, even advantageous, principally by competitively weakening pasture grasses."*

- *Priorities for turf protection should not only target zonally representative sites of current eco- and biodiversity, but reformation opportunities of coastal sequences of native vegetation so rarely encountered in this study.*
- *Light grazing by sheep may not be incompatible with a gradual reconstitution of coastal sequences of native vegetation involving turfs, while maintaining species and community diversity of attendant turf.*
- *Presence of cattle is detrimental to all management objectives for turfs.”*

In accord with this information, a switch from cattle to sheep should be planned for within a short-term period, e.g. two years. This will allow for transition in the farming operation.

The management plan is not fit for purpose

The Farewell Spit Nature Reserve and Puponga Farm Park Management Plan (1990)⁵ is woefully outdated. A condition of the new lease/license should be an agreement between the applicant and DOC that the management plan will be reviewed with appropriate and widespread public consultation and as a matter of urgency.

The lease/licence has no reference to restoration, revegetation and eventual withdrawal

The long-term benefits of revegetation and restoration lie in the provision of precious coastal and wetland habitat that will act as a carbon sink and provide a home for indigenous fauna.

The new lease/licence should be issued in conjunction with an agreement that stipulates a staged replacement of cattle with sheep in the short-term and a long-term (10 year) plan for complete withdrawal and restoration.

We wish to be heard in support of our submission.

Yours sincerely,

Jan Finlayson,

President, Federated Mountain Clubs

1. <https://www.ipcc.ch/report/ar6/wg1/>

2. <https://ipbes.net/global-assessment>

3.

<https://www.doc.govt.nz/nature/biodiversity/aotearoa-new-zealand-biodiversity-strategy/te-mana-o-te-taiao-summary/>

4. <https://dcon01mstr0c21wprod.azurewebsites.net/globalassets/documents/science-and-technical/sfc107.pdf>
5. <https://www.doc.govt.nz/nature/biodiversity/aotearoa-new-zealand-biodiversity-strategy/te-mana-o-te-taiaroa-summary/>
6. <https://www.doc.govt.nz/about-us/our-policies-and-plans/statutory-plans/statutory-plan-publications/conservation-management-strategies/nelson-marlborough/>
7. <https://www.doc.govt.nz/globalassets/documents/parks-and-recreation/places-to-visit/nelson-marlborough/farewell-spit-brochure.pdf>
8. <https://www.mpi.govt.nz/dmsdocument/32134/direct>
9. <https://www.theguardian.com/world/2021/aug/10/a-land-divided-by-extremes-what-the-ipcc-report-says-about-new-zealand-climate-change>

Submission in Concession Application for grazing lease Puponga Farm Park.

Thank you for this opportunity to submit on this application.

It has often been disappointing when visiting the farm park to see overstocked areas, animals grazing in wetlands or volunteer planted areas, poor fence upkeep, pest plants and animals eg goats and inappropriate stock on the fragile sandhills.

We would like to see the farm park run firstly as a conservation area, and secondly as a productive farm.

With the upcoming pressure on farmers to lift their farming practices to a more sustainable level, it is very important DoC leased land is seen as exemplary. It could also provide a model for farm practices on similar land.

To that end FoGB would like to see the new lease paying careful attention to:

1. removing cattle from the park,
2. ensuring all fencing is maintained and upgraded to ensure stock is unable to access areas of conservation value and
3. using advice from suitably qualified land use and environmental experts to evaluate the lease in order for it to be an excellent model for farm practices anywhere there are environmental values to protect.
4. Pest species, eg goats and menace plants to be removed.
5. Climate change obligations need to be written into the conditions now as the lease is for some time. This will involve destocking and a fertiliser regime that recognises the importance of this.

We would like to be heard in support of this submission.

Heather Wallace Sec. Friends of Golden Bay Inc.

██████████
██████████.



A. Permission Application Number and Name of Applicant

91765-GRA Lone Star Farms Limited

B. Name of Proposed Activity and Location(s)

Grazing Puponga Farm Park, including lease of farm buildings

C.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)	Royal Forest & Bird Protection Society of NZ Inc (Forest & Bird) National Office & Golden Bay branch
Contact person and role of organisation	<i>Debs Martin, Regional Conservation Manager</i>
Email (Communication from DOC will be via email unless alternate contact requested)	[REDACTED]
Alternate contact for all DOC communication	[REDACTED]
Phone/Mobile	[REDACTED]
Postal Address and Post Code	[REDACTED]

I wish to keep my contact details confidential

Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.



A. Permission Application Number and Name of Applicant

91765-GRA Lone Star Farms Limited

B. Name of Proposed Activity and Location(s)

Grazing Puponga Farm Park, including lease of farm buildings

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Debs Martin
Organisation	Forest & Bird
Date	8 November 2021

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. Grazing/stocking rates
2. Fertiliser use in sensitive catchments
3. Stock exclusion
4. Fencing
5. Environmental impact assessment is deficient
6. Term of lease

My reasons for my objection or submission are:

Please see attached file for details on objection.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Please see attached file for details of proposed amendments

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Submission on Concession Application – Pūponga Farm Park – Forest & Bird	PDF	Details of our submission

How do I submit my objection or submission?

Complete this form and email to permissionshokitika@doc.govt.nz . You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Attn: Lucy Croft, Private Bag 701, Hokitika 7810

Submission on Concession Application

Grazing Lease at Puponga Farm Park by Lone Star Farms Ltd

Submission from: Royal Forest & Bird Protection Society of NZ Inc (National Office & Golden Bay branch)

Date: 8 November 2021

As indicated on the submission form, we are opposed to the proposed conditions of lease.

Our opposition relates to the following matters. If the matters are resolved, we would not oppose the lease, but would like our ongoing reservations to be noted and future management to evolve.

Overview:

Puponga Farm Park is an important area of public conservation land for the following reasons:

- It provides important habitat for a number of species, some of which are endangered. These include, but are not limited to:
 - Lizards
 - Native fish
 - Native birds
 - Invertebrates
- It has a number of complex ecosystems that require good conservation management, including:
 - Dune ecosystems, e.g. lakes, vegetation, dune features
 - Wetland, lake and riverine ecosystems
 - Forest and shrubland ecosystems
 - Coastal ecosystems, including cliffs and associated plant and animal communities
- It is an important connection corridor between Kahurangi National Park to the south, and Farewell Spit to the east.
- It has a high degree of public visitation

Forest & Bird has strong reservations about ongoing grazing management in such an important place given the stocking regime requires significant amounts of external inputs, e.g. fertiliser, to maintain productivity for grazing.

At a time when we are facing the twin crises of biodiversity and climate, preferable options exist for indigenous forest and habitat restoration, and carbon sequestration using eco-sourced species.

The Management Plan for Farewell Spit and Puponga Farm Park is dated 1990. Although some of the information remains relevant (e.g. description of habitat), many of the management options are outdated and inappropriate 30 years on.

Such management options are driving inappropriate activities, e.g. 4.3.2 "Grazing management, fertiliser application and judicious oversowing will be used to promote high producing species to form well develop pasture on the farm park."; which is inconsistent with other management requirements, e.g. 1.1.4 "Management on the farm park will protect the indigenous flora, fauna and natural features of the reserves, particularly the nature reserve."

It is imperative that the Management Plan is reviewed and amended to support better deliberations next time the lease is up for review, particularly the role and type of farming. No modern farming operation is managed by a three-decade old approach.

1. Grazing/Stocking Rates

Our calculations, based on the information provided in the Concession Application, indicate that the stocking rates on Puponga Farm Park would be high for the type of land, and we submit are unacceptable given the land is public conservation land (see Appendix One).

Our assessment is based on information provided by Beef & Lamb NZ, which shows stocking rates on SI hill country are around 2 -7 stock units per hectare, with stocking units increasing on finishing and/or breeding units, up to 14 SU/ha.

The stocking regime over 400 hectares enabled by this concession could be as high as 17.44 if the number applied for were allowed to be grazed at the maximum intensity stated on the application. We realise it is more likely to be in the vicinity of 7 SU/ha, but we see this still as a relatively high ratio given the status of the land.

Some of the reasons for this are the application of fertilisers as described within the DRAFT Annual Plan available for download on the Consultations website (to be discussed below).

Decision sought:

Reduce stocking rates to a maximum of 5 SU/ha (averaged over the year).

Ensure there is no pugging from stock, except within 1 – 2m of water troughs. Such troughs must be sited appropriately to ensure there is no ponding or run off into waterways.

2. Fertiliser Application

Forest & Bird is concerned that the fertiliser application regime is too high as it is geared to enable high stocking rates (as above). With regular urea application before grazing (the DRAFT annual plan was absent on rates or frequency), and regimes including aerial and ground based applications of fertiliser, including over the hill country west of Triangle Flat (in an area that is known habitat for lizards); there appears to be little control on the fertiliser regime within the lease.

Forest & Bird submits that fertiliser inputs should be significantly reduced to the bare minimum, and should be excluded from any catchments that drain into wetlands, or dune lakes (including the dune lake behind the vegetation and foredunes at Wharariki Beach).

Forest & Bird has had presentations by the Cawthron team undertaking research for the Lakes380 project, and we are concerned that fertiliser inputs into lake systems can have long term detrimental effects on the ecosystem. Nitrogen-based fertilisers flow through subsoils and can enrich catchments, and phosphorous and other nutrients can flow overland.

The Lakes380 project sampled both Kaihoka lakes which are in mesotrophic (average) condition. An information sheet for the east lake – Tinawhu is pending, and results suggest some change in the lake in recent years, but quite variable in the past. It's very fortunate that for both Kaihoka lakes significant parts of their catchment are still intact.

There is a lot of literature out to show that fertiliser when not applied properly or in too higher quantities results in runoff into waterways which causes eutrophication, often leading to algal blooms. Care must be taken when fertilising around lakes. For example, here are some papers outlining the problem: <https://cdnscepub.com/doi/abs/10.1139/f74-110>; <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1365-2427.2005.01435.x>.

Although not published yet, a thesis from the work done by Cawthron in a lake in the Wairarapa has shown although deforestation caused some changes in water quality, what changed the water quality the most was the application of fertilisers starting in the 1960's. The thesis can be accessed here: <http://researcharchive.vuw.ac.nz/xmlui/handle/10063/9317> (but not an easy read).

Decision sought:

No fertiliser should be applied within catchments that drain into lakes and/or wetlands on the property.

Aerial fertiliser should not be applied over the hill block to the west of Triangle Flat, especially in areas where indigenous vegetation and/or rock landforms remain.

Fertiliser inputs should otherwise be strictly limited to ensure no leaching.

3. Stock Exclusion

Forest & Bird strongly support the removal of cattle from the areas identified in the maps. However, sheep grazing, and the inputs necessary to maintain them, are also problematic as they can cause degradation to the water quality.

Decision sought:

Stocking densities of no more than 2 SU/ha (averaged over the year) in areas where cattle are excluded.

No visible signs of pugging should occur except in the immediate vicinity (within 1 – 2m) of water troughs. These should be sited appropriately to ensure ponding and ensuing run-off does not occur.

4. Fencing

Concerns have been expressed by our Forest & Bird members around the inadequacy of fencing and the need to ensure that fences are well maintained and stock are excluded from the areas where they are not permitted.

Decision sought:

Lessee to maintain stock fences and ensure no stock access to areas where they are not permitted, including areas of revegetation.

Ensure all waterways are adequately fenced with appropriately planted riparian margins.

5. Environmental Impact Assessment

The environmental impact assessment is inadequate and inappropriate. No mention is made of indigenous vegetation within the Farm Park, nor the need to ensure those values are protected. No mention is made of indigenous fauna that utilise the Farm Park, including lizards and/or other animal species. We are aware of past damage with respect to aerial weed control on regenerating native vegetation.

Decision sought:

Indigenous flora will be protected from negative impacts of grazing, fertiliser use, and herbicides. No aerial herbicide control is to be done, unless in direct management arrangements with the Department of Conservation

Cats are not permitted to be kept within the Farm Park.

Areas known to contain threatened or at risk species of indigenous fauna, must be protected from negative effects from grazing and other farming activities, e.g. weed control.

The dune lakes/wetlands should be a safe haven for wildlife, and there should be no gamebird shooting within the Farm Park, except for pest control in agreement with Department of Conservation, e.g. Canadian geese.

In consultation with the Department and other parties undertaking predator eradication within the area, the lessee must permit predator control to be undertaken across the land, and if aerial control is needed, will provide for appropriate opportunities to do so e.g. through temporary destocking.

The concession should require for the negotiation of ongoing retirement of land from grazing to enable habitat restoration, in discussions with the Department of Conservation. The lessee will not be able to withhold permission for that, but negotiations will include such things as reduced lease costs, etc.

6. Term of lease

Forest & Bird is concerned that the term of lease, i.e. 10 years, is too long and that given the twin crises of biodiversity loss and climate change, Pūponga Farm Park could become another tool for improving biodiversity gains and storing carbon.

The Management Plan must be reviewed and updated to ensure it enables conservation outcomes to override considerations of grazing requirements.

Forest & Bird understands grazing is required to support suppression of grasses and weeds and provide a barrier for fire to spread onto Farewell Spit/Onetahua. Other methods could also be considered to support that outcome, and Triangle Flat is only a small part of the Farm Park, and other areas could and should be retired and restored over time.

We seek a maximum term of 5 years.

We wish to be heard in support of our submission.

Appendix One:

Information used to support submission -- issues of stocking rates:

Stocking rates per hectare:

[Farm classes | Beef + Lamb New Zealand \(beeflambnz.com\)](#)

SI hill country: 2 – 7 SU/ha

SI finishing/breeding: 6 – 11 SU/ha

SI finishing: 9 – 14 SU/ha

Stock Units standardisation:

[Standardisation between livestock classes: the use and misuse of the stock unit system \(grassland.org.nz\)](#)

Beef Cows: 6 SU

Beef Calves, Yearlings and Heifers: 4 - 4.5 SU

Sheep: 0.5 – 1

Hoggets: 0.7

Rams: 0.8

Bulls: 6 (negligible)

Calculations for Stocking Units from application:

80 Beef: 480 SU

110 Calves, Heifers & Yearlings: 440 – 495 SU

4 Bulls: negligible - 24 (does not specify term)

6000 Sheep: 3000 – 6000 SU

Total: 3920 – 6975 SU / 400 ha

Stocking rates per ha range from 9.8 – 17.44 SU/ha

Calculations for Stocking Units taken from DRAFT Annual Plan (June):

72 Beef: 432 SU

3 Bulls: 18 SU

1650 Ewes: 1650 SU

1010 Hoggets: 707 SU

29 Rams: 23.2

Total: 2830.2 SU / 400 ha

Stocking rates per ha = 7.08 SU/ha from June