

COMMENT SUBMISSION FORM
Publicly notified application for leases
licences, permits, or easements

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

[Redacted]

Address for Service (Postal Address):

[Redacted]

Post Code:

[Redacted]

Telephone: [Redacted] Email Address:

[Redacted]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

Renewal of this application for a 736 ha cattle grazing licence, which has been allowed to run on since the early 1980s, when I was a member of the Otago Conservation Board. Also grazing impact extends well beyond the licence area, as explained below.

My submission is [include the reasons for your views]:

I am strongly opposed to the renewal of this application for a 736 ha grazing licence, which has been allowed to run on since the early 1980s, when I was a member of the Otago Conservation Board: The Board had jurisdiction over this area at the time and recorded its opposition to the renewal. Since then the area has become part of the SWNZ World Heritage Area, which should be further reason to exclude stock grazing of this area. Note: Cattle grazing within a World Heritage Area cannot and does not "create a beautiful scene" as stated by the applicant. Cattle are entirely out of place in such an area and must be seen to be so, legally and morally.

Enforcement of the licence area boundaries, apart from the fence along the highway (also quite out of place in a protected area of the highest rank) is not possible) and neither the upper or lower catchment boundaries have natural barriers and hence stock are known to graze both Pleasant Flat and below the Roaring Billy. Indeed, the lower catchment, to below the bridge, shows clear signs of stock grazing, as does the true left of the licence area (browse damage is recorded in Andrew Wells' report of 31/3/16, as is soil damage in the vicinity of Douglas Bluff, and localised stock camps where severe damage is reported.). The true right was not inspected by Wells but predictably is also affected by grazing, with browse damage in the adjacent valley floor forest.

Unauthorised indigenous shrub clearance recorded in the DoC report of A. Wells on the lower true right of the licence area, should not have been tolerated/condoned, particularly adjacent to a major tourist highway in a World Heritage Area, and must be seen to represent serious negligence on behalf of the Department. I note with concern that the applicant has not yet consulted the Te Rananga O Makawhio, as required to formalise the application.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Renewal of this grazing licence, within the SWNZ World Heritage Area and adjacent to a main tourist highway, should be declined.

G. Your Signature

Signature



Printed name of submitter or person authorised to sign on behalf of submitter

7/5/18
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor

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Address for Service (Postal Address):- _____

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D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

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

Grazing cattle in a World Heritage Area / UNESCO /
Te Wahipounamu South Westland NZ

My submission is [include the reasons for your views]:

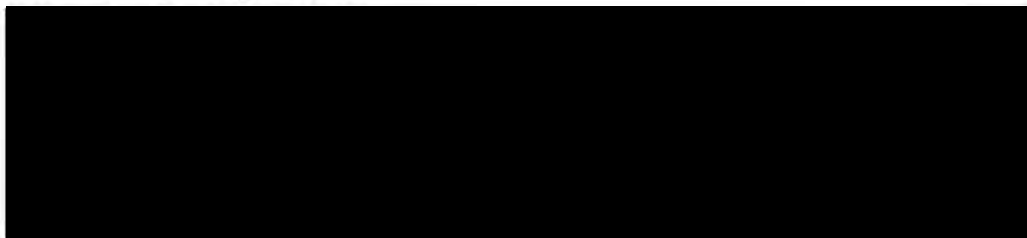
This is a UNESCO World Heritage Area and should not be grazed commercially.

* please make this submission confidential *

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Leave ^{air} National Parks free of farming and sustainable for trampers to enjoy, and protect air Native species from further extinction.

G. Your Signature



23/5/18
Date

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C. Submitter Information-

██████████
██
██
██
██

D. Statement of Support/Opposition

We **Oppose** this Application.

E. Hearing Request

We **Do** wish to be heard in support of this submission at a hearing.

F. Submission

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

All of it.

Our submission is:

We oppose the granting of this grazing licence concession application ('the concession'). Our reasons are explained in the text that follows and include

- (1) Legal and policy matters
- (2) Ecological damage and degradation
- (3) Five additional matters that should be taken into account

Pros and cons are summarised in Table 1 below.

We also include three appendices:

- Appendix 1 maps and photographs taken in May 2018 showing damage caused by cattle farming in the Haast Valley above the Roaring Billy,
- Appendix 2 an analysis of DOC's monitoring performance, and
- Appendix 3 evidence indicating non-compliance with conditions of the now-expired lease.

Table 1. Pros and Cons of granting the concession

Pros	Cons
Revenue to government (\$2,120 per annum) Contributes slightly to employment Revenue for a farming business (c.a. \$25,000 per annum based on 50 calves x \$500)	Inconsistent with the Conservation Act 1987 functions of DOC to <ul style="list-style-type: none"> • Maintain intrinsic values • Foster recreational enjoyment • Allow tourism Contrary to the Mt Aspiring National Park Management Plan 2011 Inconsistent with current government policy for biodiversity, fresh water, carbon and tourism Degradation of ecosystems, habitats and other ecological values <ul style="list-style-type: none"> • Small wetlands • Native fish habitat • Water quality • Native riverbed vegetation • Forest regeneration • Threatened riverbed bird breeding habitat • Lost opportunity for ecological recovery Greenhouse gas emissions <ul style="list-style-type: none"> • Methane and nitrous oxide • Lost opportunity for carbon sequestration Environmental reputation <ul style="list-style-type: none"> • Pristineness compromised • Inconsistent with World Heritage status Diminishes recreation & tourism <ul style="list-style-type: none"> • Degrades recreational experience • Limits recreational opportunities • Limits tourist experience Obstructs riverbed access <ul style="list-style-type: none"> • Electric fence • Inadequate gates Inadequate management of the licence <ul style="list-style-type: none"> • Lack of credible monitoring • Non-compliance issues • Enforcement failures Reduced business revenues <ul style="list-style-type: none"> • Reduced duration of tourist visit & spending

Legal and policy matters

Granting this licence renewal would be contrary to Section 6 (a), (ab) and (e) of the Conservation Act 1987. It would allow the continued degradation of intrinsic values, ongoing restriction of recreation and tourism by limiting access to the Haast riverbed, and spoiling of the experience of nature through fouling and destruction caused by grazing cattle.

The licence would continue to be contrary to Section 6.7.5 of the operative Mt Aspiring National Park Management Plan (2011). The area delineated in the public notice on the DOC website fails to show (or include in the marked licence area) those parts of Mount Aspiring National Park that have been and would continue to be grazed. National Park and Stewardship land on the north side of the electric fence along State Highway 6 comprises about 10% of area that would be (and is currently) grazed. This is not mentioned in the publicly notified documentation.

Granting this licence renewal would therefore be inconsistent with the functions of the Department and contrary to the operative Mt Aspiring National Park Management Plan. Consistent with the Ombudsman's April 2018 decision on aircraft landing limits on Ngapunatoru Plateau, we believe that it was unlawful to grant this grazing licence back in 2013 and recent decisions mean that granting its renewal is now very clearly unlawful.

Granting the licence would also be inconsistent with several of the current Government's policies, including:

- Improving water quality, including by getting cows out of rivers. The Department should not provide special dispensation for cattle grazing in a nationally outstanding river valley on public conservation land (including National Park) within a World Heritage Area.
- Reducing greenhouse gas emissions from agriculture and maximizing carbon sequestration. The Department should be leading by example.
- Providing high quality experiences for visitors that enhance the national reputation. New Zealand's natural environment is a key reason for tourists to visit New Zealand generally and the West Coast in particular and ease of access contributes to its enjoyment. It is very difficult to locate a place for a tent on a grassy Haast River flat that does not include cattle faeces.

Ecological damage

We have walked over the area covered by this application on numerous occasions since 2003, most recently on 1 and 12 May 2018.

We found cattle sign far from pasture up both Debris Torrent and Cuttance Creek in steep, difficult terrain, well outside the boundaries of the licence. Similarly we found cattle impacts throughout the areas of National Park between the roadside electric fence and the boundaries of the licence area. Deer are scarce throughout. We saw deer sign only in Cuttance Stream and Debris Gully.

We observed significant ecosystem damage.

- Stream crossings, tracking, bank collapse and defecation all degrade what would otherwise be pristine wetlands, streams, native fish habitat and water quality.
- There is a distinct absence of palatable understory species such as *Astelia nervosa* and broadleaved shrubs that are commonplace on the south side of the road.
- In some forested areas close to pasture, trampling had almost eliminated understory vegetation.
- The largest area of pasture on the true right is the un-named flat opposite Clarke Bluff. Here we
 - found a cattle-trampled spring that would otherwise be excellent habitat for native aquatic plants and fish
 - observed tracking and widespread damage to shrubs. The most common shrub is mingimingi (*Coprosma propinqua*). These are now scattered individuals as a result of thinning caused by cattle browse and trampling. Any seedlings were browsed to the

- height of the grass tier and unable to recruit to the shrub tier.
- saw that the native grass toetoe (which should be abundant here) and the nitrogen fixing shrub tutu have been all but eliminated from the flat.
- The largest area of pasture on the true left is Sunny Flat. Here we saw
 - rare ribbonwood forest within the National Park and other conservation land that is severely degraded by cattle
 - a fence system designed to provide stock with full access to the National Park between the licence area and SH6 while giving the appearance of contrary intent
 - a stockyard with recent earthworks and drains dug to discharge raw effluent (cattle faeces, urine and silt) directly to Solitude Stream, which then flows into the Haast
 - severe to extreme soil pugging and degradation
 - patches of ribbonwood forest that are clearly visible on a 2012 satellite image but are now so badly damaged by cattle that some will not survive. Groups of dead or dying spars are all that remain of two stands (see photos)
 - serious degradation of lower Solitude Stream caused by the stockyard effluent discharge and destruction of stream banks by cattle
- We also visited a large flat on the true right under Douglas Bluff. Here we found
 - much damage to regenerating woody vegetation (mainly *C. propinqua*)
 - a system of levee backswamp wetlands seriously degraded by cattle. Several had no vascular plant life.
 - Mounds where toe toe had previously been growing. We found no living toe toe.

This is in marked contrast to the Clarke Valley some ten kilometers upstream. This valley has been cattle-free for about a decade. The most spectacular recovery is in the crystal clear freshwater springs and wetlands that now support lush native aquatic plants, abundant aquatic invertebrates and native fish. Vegetation recovery is most apparent at the beech forest margins where palatable shrubs are freely regenerating. On the open flats, pasture grasses and clovers dominate, but with scattered toetoe and native sedges that seem to be becoming more numerous. Winter frosts probably limit woody vegetation recovery. Blackberry is not present.

Perhaps the most insidious impact of grazing is disruption of natural riverbed landform processes associated with river flat formation. These vegetated river flats are temporary landforms that erode away and reform nearby over decadal to century timeframes. They form over elevated shingle bars formed by floods in places where sand carried by wind and floods is deposited faster than it is removed.

- At first, wind-blown sand is captured among cobbles and then vegetation accelerates the process.
- Vegetation, initially mat daisies (*Raoulia* spp.) and then grasses such as toe toe and shrubs such as tutu and mingi mingi enhance sand capture causing mounds to form around individual plants. As vegetation coverage increases, the mounds grow and coalesce resulting in the formation of river flats that may become elevated above all but the most extreme floods.
- The vegetation becomes increasingly woody, and may over time become fully forested. River channel migrations erode the flats, redistributing sand and woody debris downstream.

Intensive riverbed grazing disrupts this process by trampling the mat daisies, removing toetoe and woody vegetation and preventing its development. Trampling accelerates the erosion of recently formed flats. The net result is landscape-scale reduction in the area of vegetated river flats and cessation of river flat forest development.

Disruption of these natural landform processes is consistent with neither the purposes for which this PCL is held nor the maintenance of intrinsic values (Conservation Act Section 6 (a)).

We have observed both banded dotterel and wrybill feeding and nesting on the Haast riverbed. Both are threatened species that are currently in steep decline nationally. Their nests are disturbed by wandering cattle.

Additional matters to take into account

1. The Department has failed to exercise its duty to protect the public interest by
 - giving effect to its stewardship functions (Section 6 of the Conservation Act 1987) to ensure compliance with licence conditions (Part 3B of the Conservation Act 1987) and
 - ensuring compliance with the operative Mt Aspiring National Park Plan generally and Section 6.7.5 in particular.

A single, outdated, and deficient monitoring report is provided to inform the public of the effects of this concession. Our observations show that the Department has been negligent in both monitoring effects of farming activities and ensuring compliance with concession conditions. We detail our concerns about the adequacy of monitoring in Appendix 2 and list evidence for specific instances of concession condition breaches in Appendix 3.

We submit that it is not in the public interest to grant a concession if the responsible agency does not give effect to its statutory obligations by ensuring that compliance with licence conditions is both monitored and enforced. Paragraph 16.1(a) of the Standard Terms and Conditions for Grazing Licences provides for termination of the concession if the Concessionaire breaches any of the conditions of the concession.

2. Beef farming is responsible for substantial greenhouse gas emissions, notably methane and nitrous oxide. Maintaining grazing and pasture at the expense of woody vegetation recovery is a missed opportunity to reduce emissions and sequester carbon. The Department should demonstrate leadership by managing conservation land in ways that minimise GHG emissions and maximise carbon sequestration by native vegetation.
3. New Zealand's environmental reputation is arguably most exposed by our performance within World Heritage Areas. Ecological degradation caused by cattle and their defecation in high-quality natural waterways is seen by several hundred thousand tourists annually, and is, we suggest, neither appropriate nor in New Zealand's best interest. The current Government policy is to get cattle out of our rivers. In granting this lease, the Department would provide a prominent exemption for cattle grazing on public conservation and National Park land within a World Heritage Area.
4. Granting this concession is not in the economic interests of local businesses, which depend on tourists stopping and staying in the vicinity of Haast. It is well recognized that many visitors pass through due to limited opportunity to safely enjoy and engage with nature. Poor access to the Haast riverbed caused by the electric stock fence, scarcity of functional gates reduces opportunity and pugging and pollution combine to encourage visitors to move on. We have long experience with the fence and its gates, and there is no question that they exclude all but a few knowledgeable locals from most of the river (and National Park on the north side of the Highway) most of the time. Thousands of tourist parties pass through Haast during the summer. If just one party per day stayed one extra night, the revenue to local businesses would dwarf that spent by Mr Cowan's farm workers.
5. Removal of grazing and associated farming infrastructure will incur some discretionary costs. Alongside the recovery of native vegetation, blackberry is likely to increase on the river flats when grazing is removed, and the Department may choose to control it in some high-use places where and if it becomes a nuisance to visitors. However, blackberry is not a threat to conservation values, and in many places will be overcome by natural succession to taller native woody vegetation. Also, if the Concessionaire is unwilling to remove infrastructure such as fences and stockyards and the Department may have to take responsibility for doing this.

In sum, we consider that renewing this concession would continue to incur considerable and wide public cost, for narrowly-shared private gains, and is unlikely to meet the statutory test of being in the public interest. The Department should permanently terminate this grazing concession and ensure that all cattle, the highway fence, and the cattle yards are promptly removed.

What outcomes would you like to address with your submission?

The grazing concession renewal must be declined, all cattle must be taken out of the upper Haast and associated infrastructure (all fences, gates and stockyards) removed. Future land management is consistent with the purpose for which it is held. We also request that DOC expressly ensures that the cattle removed are not transferred downstream to the lower Haast where they would further degrade intrinsic values on National Park and other public conservation land.

G. [Redacted]

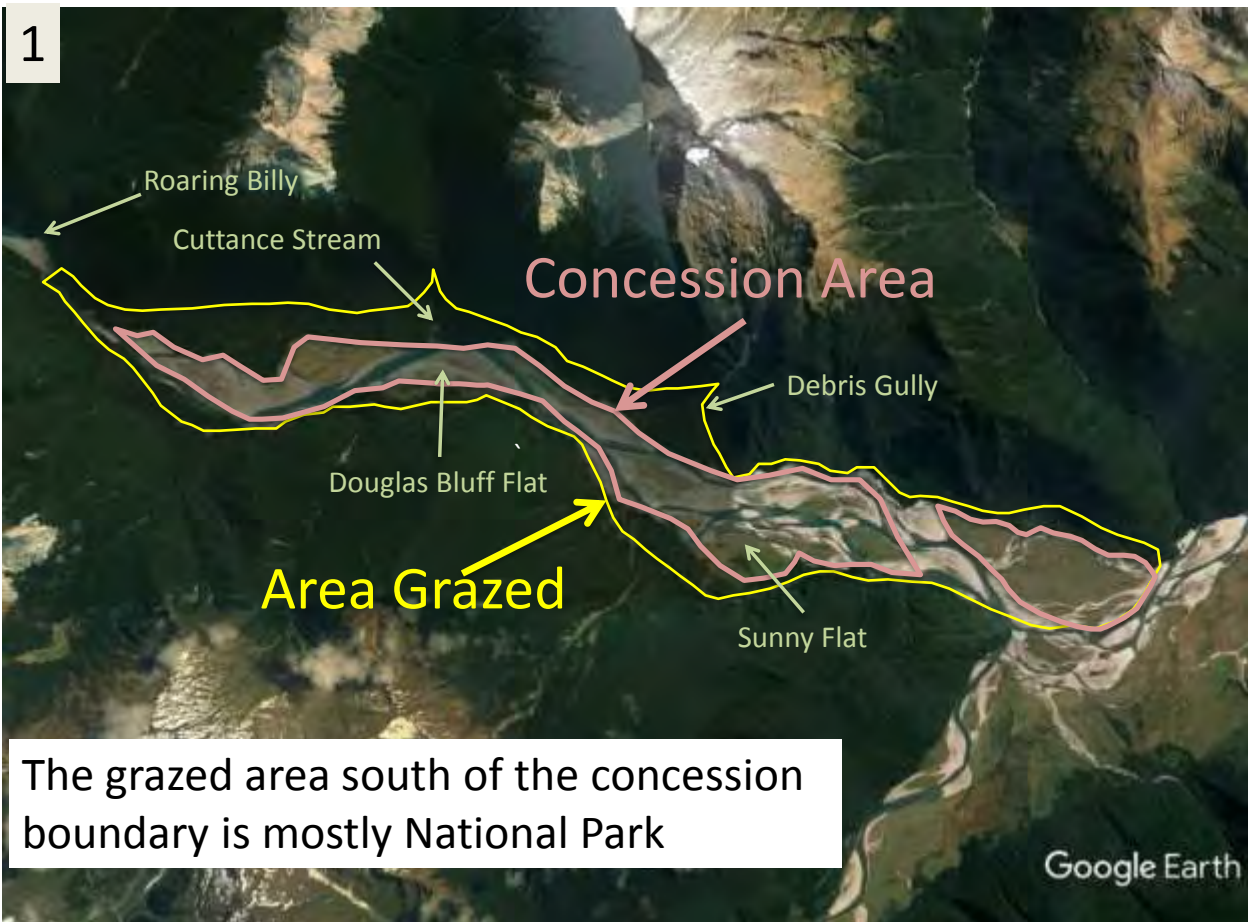
[Redacted]

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24 May 2018

Appendix 1 (of 3). Maps and photographs taken in May 2018



2

Cattle tracking and bank collapse at Cuttance Creek confluence



3

Understorey vegetation trampled out by cattle at Cuttance Creek



4

Cattle tracking in the forest at Cuttance Creek



5

Understorey loss from cattle trampling at Cuttance Creek



6

Cattle tracking lower Debris Torrent



7

Cattle browse and tracking high up Debris Torrent



8

Cattle browse and tracking high up Debris Torrent



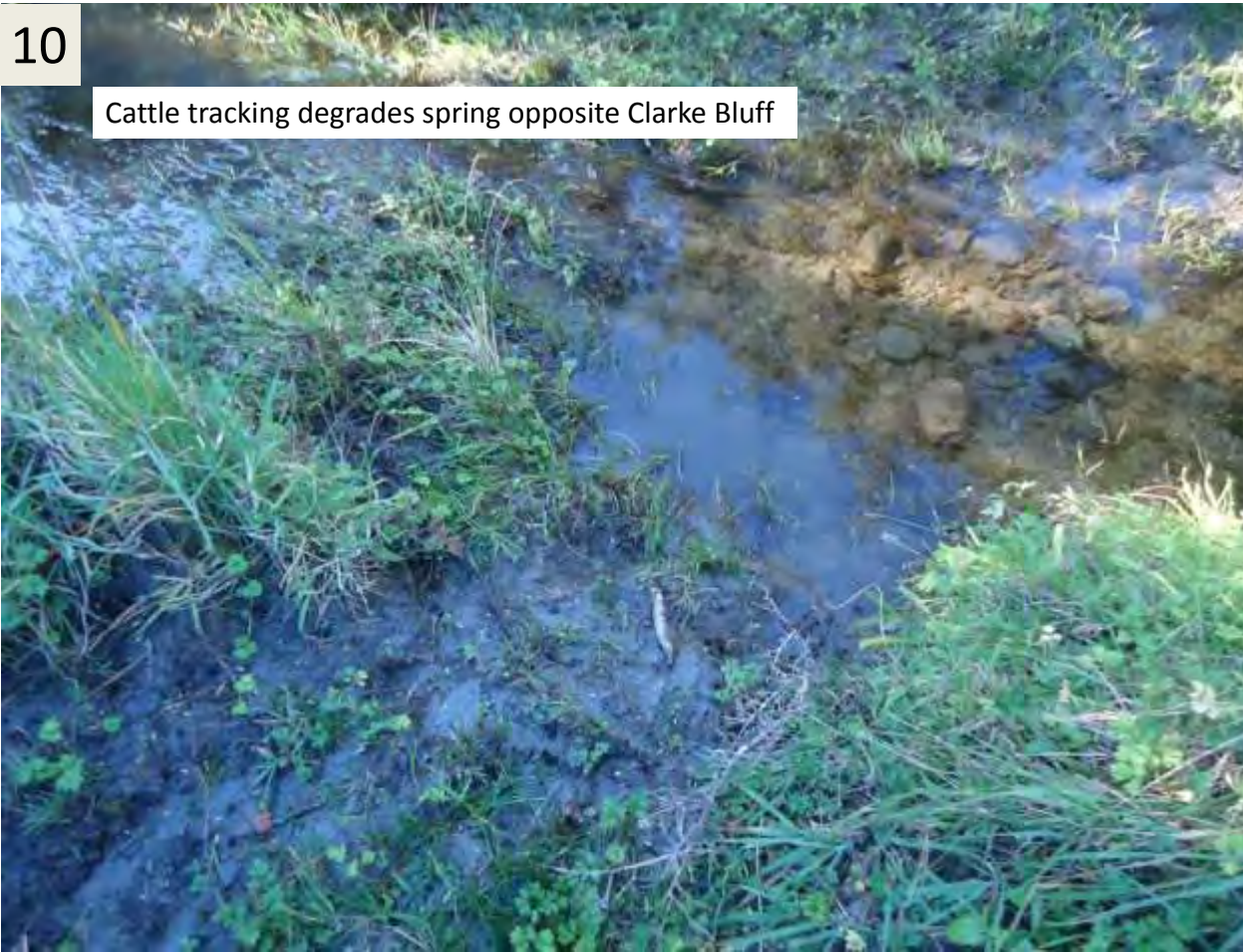
9

Cattle faeces some 400m up Debris Torrent



10

Cattle tracking degrades spring opposite Clarke Bluff



11

Cattle browse prevents shrub regeneration opposite Clarke Bluff



12



Coprosma propinqua badly damaged by cattle opposite Clarke Bluff

13



Probably fatal cattle damage to *C. propinqua* opposite Clarke Bluff

14

Beech sapling barely surviving cattle damage opposite Clarke Bluff



15

Under Douglas Bluff. Terrace forest understory eaten out by cattle, no palatables



16

Understory of similar terrace forest just across the highway - abundant palatables (mahoe, marbleleaf, wineberry, palatable ferns)



17



Sunny Flat: National Park public access from SH6

18

Sunny Flat:
Public access to the National Park



19

Sunny Flat:
Heavily grazed ribbonwood forest in the National Park,
with no regeneration



20

Sunny Flat:
Ground cover damage in ribbonwood forest
in the National Park



21

Sunny Flat:
Recently expanded
stock yard



22

Sunny Flat:
Cattle pugging and drain #1



23

Sunny Flat:
Cattle pugging and stock yard
drain #2



24

Sunny Flat:
Drain #1 enters Solitude Stream



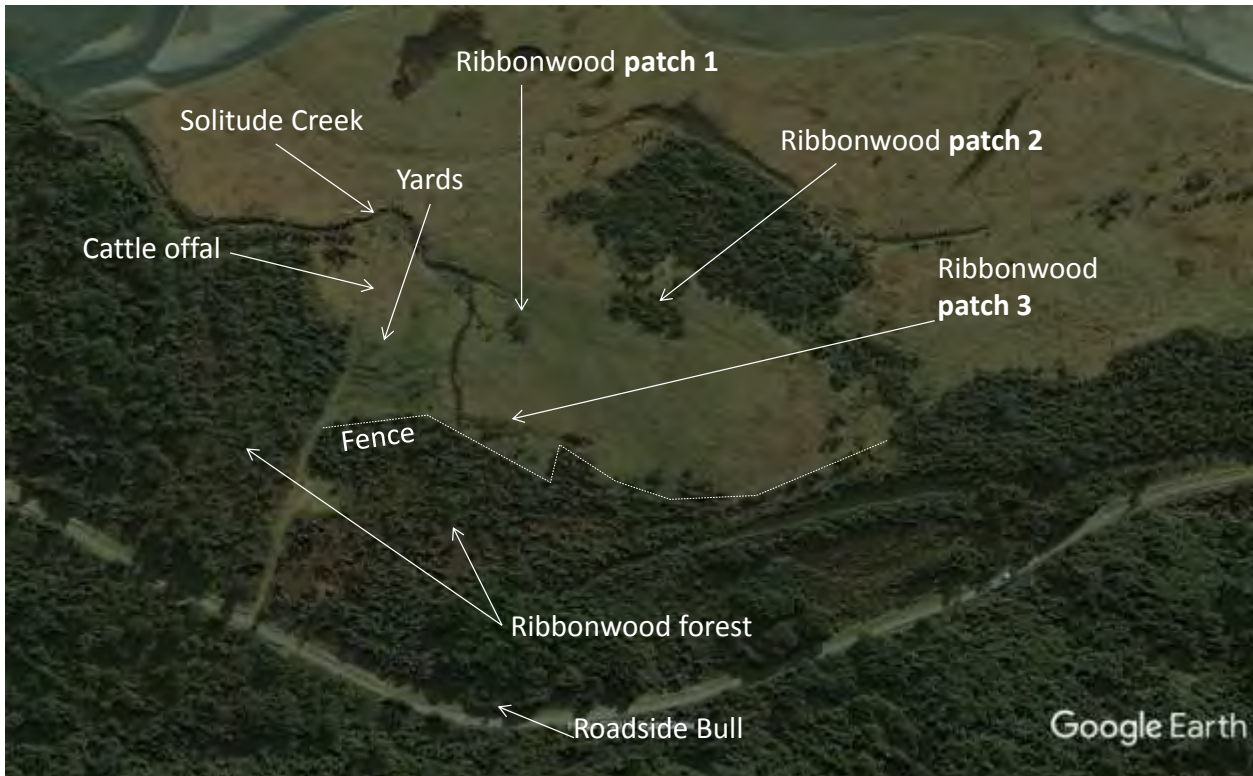
25

Sunny Flat:
Stock yard drain #2 enters Solitude Stream



26

Sunny Flat in December 2012
and location of features shown
in the next 6 slides



27



Sunny Flat:
Remains of ribbonwood **patch 1** (May 2018)

28



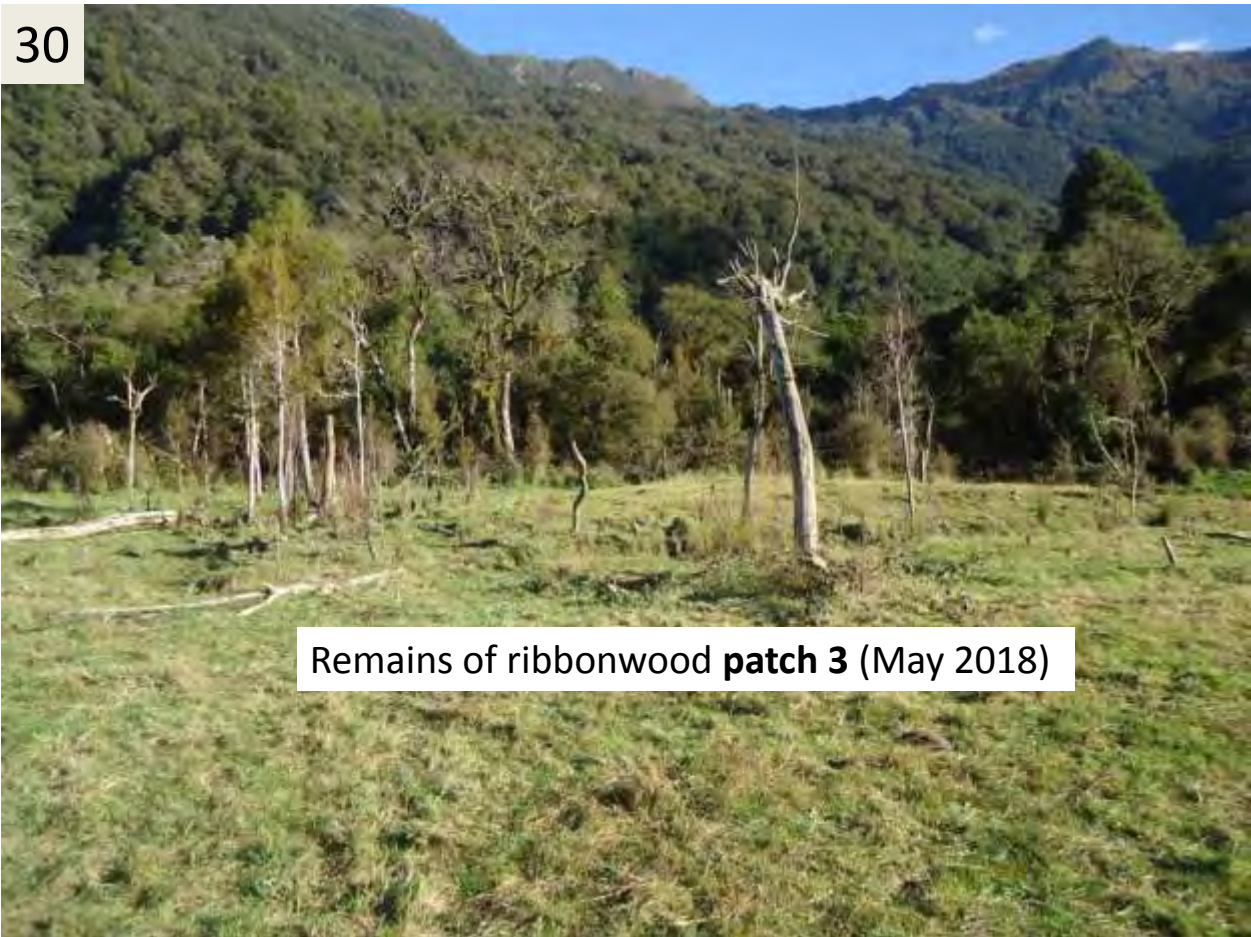
Remains of ribbonwood **patch 2** (May 2018)

29



Remains of ribbonwood **patch 2** (Dec 2012)

30



Remains of ribbonwood **patch 3** (May 2018)

31



Sunny Flat:
Cattle tracks, pugging, pollution and
stream bank damage are all evident here.

32

Sunny Flat:
Solitude Stream habitat degraded by silt

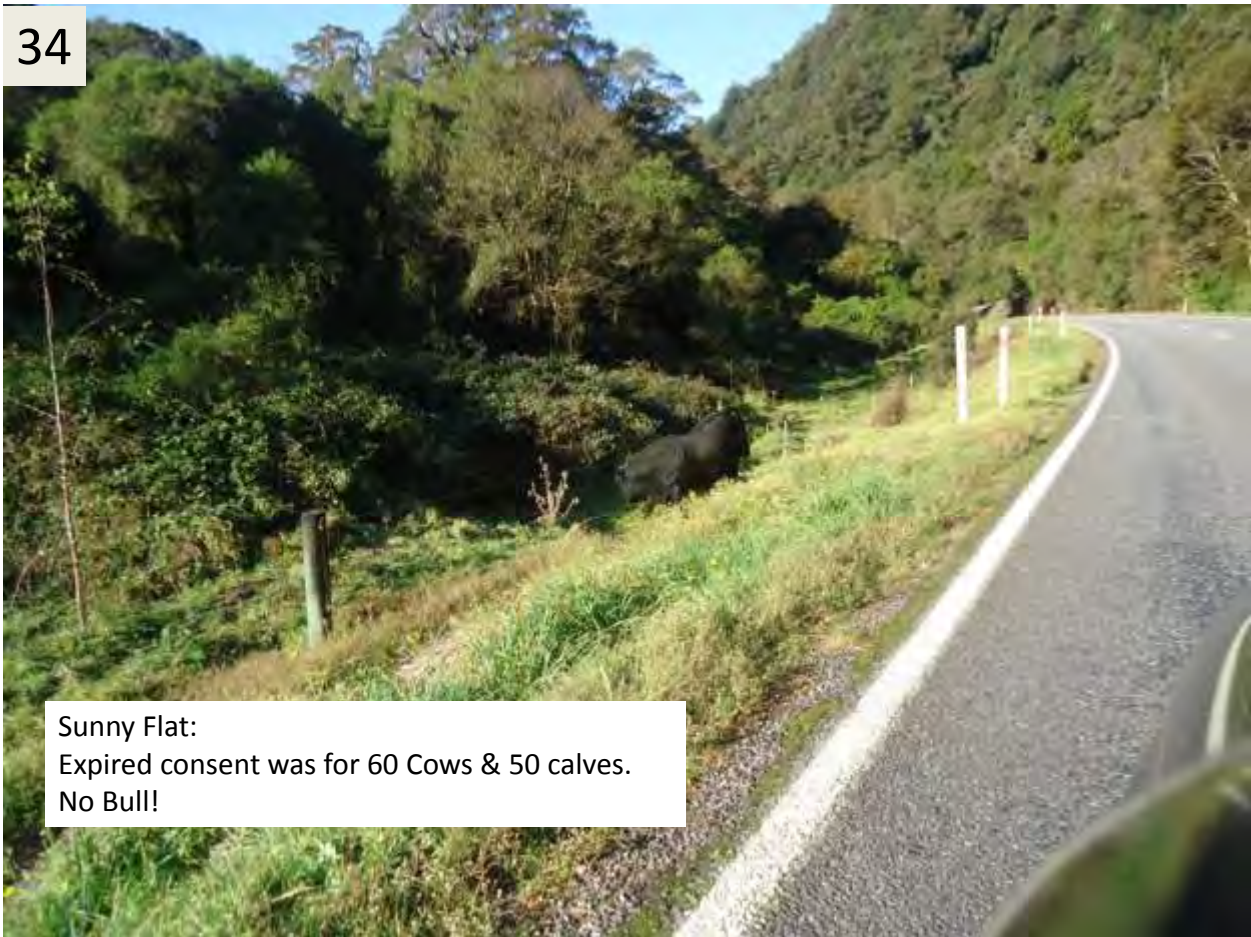


33

Sunny Flat:
Derelict hut and cattle offal left after a
homekill. Site is approx. 30m from
Solitude Stream and 10m from track.



34



Sunny Flat:
Expired consent was for 60 Cows & 50 calves.
No Bull!

35



Under Douglas Bluff
Silt from cattle pugged ground collects on leaves of
aquatic plants blocking photosynthesis

36

Under Douglas Bluff
Silt collects on leaves of aquatic plants and kills them



37

Under Douglas Bluff
Silt from cattle pugged ground compromises aquatic plant growth

Potamogeton cheesemanii



38

Under Douglas Bluff
All aquatic plant life has gone from this wetland
Cowpats visible center-left



39

Under Douglas Bluff
Another wetland badly damaged by cattle,
in the National Park



Appendix 2 (of 3). The DOC Monitoring Report

The requirements of monitoring a grazing licence are straightforward. Monitoring is needed annually, and the standard DOC lease condition requires this to be paid by the concession holder. Monitoring ecosystems, vegetation, and soil disturbance should be done by persons properly trained and qualified to do so. They should use standard, objective, and repeatable methods, and a credible sampling design that represents space and diversity of ecosystems across the concession area. Stock numbers need to be counted from the air across the whole licence area. Credible estimates will take account of detectability, given that stock spend time in forest and may not be visible from the air.

Based on Mr Wells' report, not one of these requirements has been met. There are no special circumstances that can explain this. Many ecological consultants and a number of DOC monitoring staff have the skills and qualifications necessary to undertake the assessment. Local commercial jetboat operators can transport monitoring personnel up and down the river. There is no shortage of helicopter operators to provide the means to aerially monitor stock numbers.

Frequency: Inspections occurred in 2011 (before the current licence was issued in late 2013) and again in 2015 (2½ years before the present renewal application). A four-year interval for annual monitoring is patently inadequate.

Coverage: There is no evidence of any attempt at spatially or ecologically representative monitoring. The 2015 inspection covered only one side of the valley, and used only walking-accessible vantage and entry points. Failure to cross the river meant that much of the concession area was not inspected.

No evidence that stock numbers have ever been monitored: Mr Wells' report noted that *"A total of about 110 cows were observed on the day of his inspection over the licence area"*. However, observations from available vantage points on only one side of the river will inevitably greatly underestimate stock numbers.

No objective monitoring of ecosystems and vegetation by qualified observer: None of the standard methods for measuring ecological change over time appear to have been used (e.g. photopoints, permanent plots or transects for recording vegetation cover, height and composition).

No evidence is provided that Mr Wells (a community relations officer) had the qualifications or training to undertake an objective assessment.

None of Mr Wells' observations is quantitative or reproducible, and no earlier objective record of observations is produced for comparison.

Instead Mr Wells' report records a list of subjective observations on a walkabout, and compares them to his own subjective 'expectations' of impact and personal impressions of acceptability. For example, his conclusion simply states that *"there are no more than the expected levels of adverse effects"*.

Salient impacts missed: the following are examples of how inadequate monitoring has obscured and understated damage done to public values.

- We saw widespread mortality of woody vegetation, particularly near pasture-forest margins and absence of recruitment near these margins. Mr Wells also noticed this but did not consider the implication: dieback and loss of woody vegetation. For example if annually, around 10% of the trees in a stand are killed by stock (i.e. a percentage consistent with our observations), only about 35% of the stand will remain after ten years. This approximates the magnitude of loss that we see.
- Failure to recognize serious impacts on wetlands. Mr Wells comments *"The several ponds were all in clear condition, and damage to soils and vegetation around their margins was very minor – only occasional hoof prints."* He did not notice that aquatic vegetation was all but eliminated and that it takes very little cattle disturbance to achieve this.

- No mention the impact of the stockyard effluent discharge at Sunny Flat, despite commenting that *“the large area of yards and fencing at Sunny Flat is well maintained.”*
- Failure to mention that some 100 hectares of National Park land (not part of the advertised licence application) has also been damaged by grazing and would continue to be grazed if the licence is granted.
- Mr Wells noted that it would be *“prudent”* to inspect the true right of the Haast in the near future because *“In the previous inspection, unauthorised vegetation clearance was observed”*. However, no report of another inspection is provided. Considerable recent clearance of native vegetation by the applicant on the Haast riverbed below the Roaring Billy is therefore not on record. We think it is relevant that:
 - about 95 hectares of native vegetation on the Haast River flats between the SH6 bridge and the Roaring Billy (dense toetoe, mingimingi, and tutu along with scattered beech, cabbage tree and marbleleaf) have been removed. Clearance was achieved by different combinations of helicopter-sprayed herbicide, machines and mob stocking. The clearance commenced in 2008 or 09 north of Mosquito Bluff but much has occurred further up valley between 2014 and the present.
 - We (and others) have reported this clearance to the Department, but have not been advised of any actions to assess the damage, take enforcement action, or remedy the impacts. Clearance was reported in 2015 but a further large area was subsequently cleared in 2016. The Department again took no action.
 - Our observations suggest stocking rates on the lower Haast have increased markedly over the last 5 years or so. The ensuing ecological damage occurring there at present can only be described as extreme. Although the situation has been reported to the Department, we are not aware that any inspection or action has been taken in response.

Appendix 3 (of 3). Non-compliance with concession conditions

We made an OIA request for all of the concession conditions for both the upper and lower Haast leases. For the upper Haast lease (Area B), this comprised the standard grazing lease conditions (Schedule 2) plus two sets of special conditions set out in Schedules 1 and 3. We also asked for documentation of any variations to conditions that have been granted. However Mr Mark Davies stated that no variations have been granted. We list below the conditions that we believe to have been breached and the evidence for this.

Schedule 1

Condition 5: Final expiry date – 31 December 2017. The lease area remained fully stocked with cattle as of May 21 2018. Section 17ZAA of the Conservation Act requires the application for renewal to commence 6 months prior to expiry. The Application form is undated but all correspondence provided is dated after 1 March 2018.

Schedule 2

Condition 8.2: ...must not waste or impoverish the soil. We observed serious pugging and widespread erosion caused by cattle. See photos 2, 10, 22, 23 & 31.

Condition 8.3: ...free of plant and animal pests... There is no control by the Concessionaire of animal pests.

Condition 8.4: ...must not bury...any animal...within 50 metres of any water body, water source or public track. We found home-kill cattle offal beside the old hut on Sunny Flat lying within 30m and 10m respectively of Solitude Stream and the track beside the stockyards. See Photo 33.

Condition 10.1: ...must not place any structures on the land not alter the land without the prior written consent of the Grantor. The earthworks on the track into Sunny Flat, the stockyards, their recent

extension and the drainage of effluent into Solitude Stream (see photos 21, 22, 23, 24 & 25) would all require written consent under this condition. Mr Davies statement indicates that no such written consent was provided.

Condition 10.2: ...must not store...materials on the land where they may obstruct the public or create a nuisance. The earthworks on the track into Sunny flat (photo 37) and the stockpile of posts (that prevent gate opening) obstruct passage around the stockyards.

Condition 14.1 (a): ...must comply with the provisions of any...policy statement made under...the National Parks Act 1980... The Mt Aspiring National Park Management Plan (Section 6.7.5 on Pg. 93) strongly discourages grazing within the national Park

Condition 14.1 (b): ...must comply with the Conservation Act 1987, the reserves Act 1977, the National Parks Act 1980. Section 5(1) of the National Parks Act states: No person shall, without the prior written consent of the Minister, cut, destroy, or take, or purport to authorise any person to cut, destroy, or take, any plant or part of a plant that is indigenous to New Zealand and growing in a national park. The Concessionaire has enabled his cattle to cut, destroy and take indigenous plants throughout about 100ha of the Mt Aspiring National Park.

Condition 16.1 (a): allows the Grantor to terminate the concession ...if the Concessionaire breaches any of the conditions of this concession... We suggest that evidence of multiple breaches is overwhelming.

Schedule 3

Condition 1: Types of stock – 60 cows and 50 calves. We saw a black bull at Sunny Flat (photo 32) and another near Gout Creek. Note that as detection probability was low (i.e. an unknown but probably small proportion of the cattle actually present were sighted) it seems likely there were number of other bulls.

Condition 3(a) Stock matters: stock are...contained within the land... There is no means to contain stock 'within the land'. We found stock living on National Park land and on Conservation Land up to 0.6km from the nearest lease boundary. See photos 2 to 9).

Condition 3(b) Stock matters: ...there is sufficient feed available on the land to discourage stock from grazing other land administered by the Grantor and not part of the concession. We found pasture to be grazed short and other land to be seriously impacted by grazing and trampling.

Condition 8: No clearing of indigenous vegetation burning or drainage will be permitted without written authority from the Grantor. Mr Davies' statement indicates that no such authority has been provided. We observed clearance of native vegetation achieved by high stocking rates (see photos 27, 28, 29 & 30), and both vegetation clearance and drainage achieved by recently dug drains (photos 22, 23, 24 and 25) and earthworks (photo 17).

Condition 11: Adverse effects. We documented serious pugging, soil compaction, streambank erosion, understory destruction, ribbonwood forest mortality, shrub and toetoe destruction, wetland degradation and stream pollution all caused by cattle. Our photographs show examples of each of these adverse effects. However it appears that the Grantor has not seen fit to issue any notices or directions to avoid, remedy or mitigate these adverse effects.



Forest & Bird
GIVING NATURE A VOICE

Submission on an application for grazing of 736 hectares within the Haast river valley, known as “Area B”, between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

63919-GRA John B Cowan

To: Director-General
Department of Conservation
Shared Service Centre
Hokitika

By Email: Chari Taylor [REDACTED]

[REDACTED]

Address for service: [REDACTED]

[REDACTED]

[REDACTED]

A. INTRODUCTION

1. The Royal Forest and Bird Protection Society Incorporated (“Forest & Bird”) has campaigned for more than 90 years for the protection of New Zealand's native species and the habitats on which they depend. Forest and Bird has been actively involved in raising awareness and seeking to protect the high natural values on the West Coast including the protection of its wild rivers.
2. Nationally, Forest & Bird has approximately 80,000 members and supporters who support the Society's objectives of securing protection for native species, ecosystems, and landforms.
3. Forest and Bird **opposes** the application for a license for grazing within Public Conservation Land in the Haast.
4. Forest and Bird wishes to be heard on the matter.

5. In preparing this submission the Application and AEE, along with the submission of Drs Susan Walker and Theo Stephens, have been considered.
6. Drs Stephens and Walker are very familiar with the license footprint. Forest and Bird supports the matters raised in their submissions.

SUBMISSION

7. For several years Forest & Bird members have expressed their concern about the impact of cattle grazing on riverbeds. Our braided riverbeds are rare ecosystems internationally. They can be the last refugia for many of our threatened plants and animals who live in or alongside these river systems. In Forest and Bird's view it is no longer acceptable for the Department of Conservation to consider such activities on riverbeds in Public Conservation Land (PCL).
8. The Application is deficient. The 'Assessment of Affects Extension' (the AEE) is simply a series of assertions and opinions unsupported by any evidence. For instance, it is claimed that grazing has 'a positive effect on vegetation in the Haast'. This is at odds with the photographic evidence of Walker and Stephens that show significant damage to indigenous species and waterways as a result of the grazing. It is not accepted that cattle are required to control weed plant species in the area and could be managed without stock grazing.
9. The positive effects appear to be mostly the ability for cattle to have sufficient pasture, and as a result preventing them from grazing too heavily into the adjoining bush and 'preventing excessive damage to vegetation'. This is hardly a compelling reason to allow the continuation of grazing on PCL. Regardless, it is not a relevant consideration under the Conservation Act.
10. Wrybill are an endemic species that breed exclusively on braided riverbeds. They are nationally vulnerable and face a myriad of threats. Banded dotterel are another bird species that breed within the application footprint and like the wrybill is in serious trouble
11. The AEE states that there are no significant effects on native bird and bats and maintains flooding would have a bigger effect on ground nesting birds than cattle. Flooding is a natural process, and although nesting birds can be vulnerable during such events, they are also highly vulnerable due to trampling of their nests by stock along with the degradation of their habitat as a result of stock. One impact is unavoidable, the other isn't.

12. The AEE maintains that 'in our opinion' cattle have a positive effect on the amenity and visual values in the Haast and goes on to discuss how a local jetboating company reports that their clients consider the highlight of their trip is to see the cattle grazing in the valley. This is entirely unsupported by any evidence and is at odds with the experience of Drs Walker and Stephens (and at any rate it would seem that the jetboating company's tourist activity is downstream of the grazing footprint).
13. Walker & Stephens have included in their submission images of the impacts of cattle grazing that do not align with the somewhat arcadian image offered in the AEE. Visitors are likely to have an entirely different perception if walking within the area cattle are presently grazing.
14. Forest & Bird considers that the application is both contrary to the purpose of the Conservation Act which seeks to preserve and protect natural resources for the purpose of maintaining their intrinsic values, and is contrary to section 25 of the Act which states that every stewardship area 'shall be' managed so that its natural resources are protected.
15. Forest & Bird considers that the application should be declined for the following reasons:
 - a. The adverse effects have not been adequately addressed or mitigated and the application should be declined under section 17U(2);
 - b. The application cannot be granted due to section 17U(3) as it is contrary to:
 - i. the purpose of the Act, which provides preserve and protect natural resources for the purpose of maintaining their intrinsic values; and/or ;
 - ii. the purpose for which the land section 25 of the Act which states that every stewardship area 'shall be' managed so that its natural resources are protected.
 - c. The Application is inconsistent with policies set out in Conservation General Policy, including Policies 4.5 (b), 4.6 (a) 9, 11.2 (a) and 11.3. It is contrary to General Policy National Parks including policies 4.4 (b) 8.1 and 10.2.
 - d. It is contrary to the Mt Aspiring National Park Management Plan. It is also contrary to various objectives and policies of the West Coast Tai Poutini CMS including sections 3.3, 3.5, 3.6 and 3.7, and section 4.1.

SPECIFIC SUBMISSIONS

Adverse Effects

16. S 17U of the Act lists matters the Minister must have regard to when considering any application, and includes the consideration of the effects and the measures that can be (reasonably and practically) taken to avoid, remedy or mitigate the effects. Forest & Bird considers the following adverse impacts on the natural resources within the proposed grazing footprint cannot be adequately avoided, remedied or mitigated and will fail to preserve and protect the natural values.

Natural character, Landscape and Visual Amenity

17. The AEE does not adequately assess the impact on amenity values at all, including how the activity is viewed from the state highway. The view of a tourist company (not directly reported) should not be considered. The submission of Drs Walker and Stephens show evidence of substantial damage caused by the cattle grazing; this includes pugging, browsing, inhibited access, defecation and bank collapse.
18. Their submission discusses the impact of grazing and how it disrupts processes associated with the formation of river flats. Forest and Bird shares these concerns.

Indigenous Vegetation

19. The existing activity is having an impact on indigenous vegetation. The photographs of Walker & Stephens demonstrate the impact the existing activity is having on indigenous vegetation. This includes the eating out of native vegetation, and in some instances the almost complete elimination of understory forest vegetation. Stephens and Walker report the absence of understory species palatable to stock as well as an absence of recruitment species because of stock browsing.

Birds

20. It is, in Forest & Bird's view, entirely inappropriate to countenance a proposal that could result in the degradation of the nesting and feeding habitat of our nationally vulnerable bird species such as the wrybill and banded dotterel.

Aquatic Ecology

21. Almost all of our indigenous freshwater fish species are in serious trouble. Cattle have a detrimental impact on the habitat of native fish species by damaging vegetated riparian margins, defecating in waterbodies including wetlands, and causing a decline in water quality generally. A number of threatened or declining indigenous freshwater fish are found in the Haast and its associated streams and wetlands. These include banded and giant kokopu, koaro, inanga, lamprey and long fin and short fin eel.
22. These species rely on clean streams and wetlands with vegetated riparian margins for shelter and to provide spawning habitat sheltered from predators. The Department of Conservation has a statutory responsibility (s.6 (ab) of the Act) to protect indigenous freshwater fish. It is entirely unacceptable to put these species in harms way on Public Conservation Land.

Recreation

23. Forest and Bird supports the matters raised by Walker and Stephens in their submission regarding the lack of easy access to the river for visitors as a result of fencing to contain cattle.
24. The Haast River provides an important recreational opportunity. The Department has a statutory function to foster recreation, s 6 (e) of the Act. The impact of cattle defecating, inhibiting access by fencing, trampled and damaged vegetation, drainage and other activities that have occurred as a result of cattle being allowed within the license footprint does not foster a pleasant visitor experience.

Other matters

25. The submissions of Drs Walker and Stephens raise a significant and concerning issue that in Forest and Bird's view must be taken into account; that is the matter of non compliance and an absence of adequate monitoring of the existing grazing license.
26. Forest & Bird members report that cattle associated with the expired license are grazing within Mt Aspiring National Park. Section 6.7.5 of the Mt Aspiring National Park Management Plan provides for animal grazing in limited circumstances but there is no application for grazing within the National Park as far as it can be established.

27. Unless the applicant can prevent any further incursion of their cattle into the Park the application must be declined.

CONCLUSION

28. Forest and Bird considers it is entirely inappropriate to continue to provide for cattle grazing in the Haast River. It maybe a practice that has been provided for historically but it is considered that the activity no longer has any social license.

29. There are already impacts on ecological values, including native bird and freshwater fish species. Most of these animal species are threatened. There has been an entirely inadequate assessment of these impacts and an absence of any assurance that the impacts can be avoided, remedied or mitigated.

30. The activity is inconsistent with provisions in the Conservation Act and a number of policies in DOC's General Policy, General Policy National Parks and the Mt Aspiring National Park Management Plan.

31. Forest & Bird considers the ongoing issue of the applicant's cattle intruding into the Mt Aspiring National Park to be a very serious matter. It can have no confidence that the Department of Conservation is able to adequately monitor the activities being sought in the application to ensure it is able to comply with the statutory provisions the department is responsible for.

32. For these reasons the application should be declined.

33. The land is stewardship land; it is held for conservation purposes and managed so its natural and historic resources are protected. The application, which involves such significant impacts on natural character and ecological values, does not protect the natural and historic resources and is contrary to the purpose for which the land is held. The application must be declined if it is contrary to the purpose for which the land is held.



COMMENT SUBMISSION FORM
Publicly notified application for leases,
licences, permits, or easements.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

[REDACTED]

Address for Service (Postal Address): [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _N/A

D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / Oppose this Application.

E. Hearing Request

Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

The COLB opposes all aspects of the application to granting of a grazing concession of 736 hectares of conservation land within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

Quote from a US National Park Superintendent, "There are commercial beef cattle in the park right now eating endangered plants that, if you dug one up, I'd arrest you for it."

[REDACTED]

[REDACTED]

[REDACTED]

As Forest and Bird and other submitters have covered biodiversity, ecological and legal considerations this submission focusses on the Department of Conservation's (DOC) statutory and international responsibilities with a particular emphasis on the World Heritage and Biodiversity Conventions.

Convention on Biological Diversity (CBD)

The CBD is predicated on the notion that Biological diversity underpins ecosystem functioning and the provision of ecosystem services essential for human well-being. It provides for food security, human health, the provision of clean air and water; it contributes to local livelihoods, and economic development, and is essential for the achievement of the Millennium Development Goals, including poverty reduction.

It is a principal component of many belief systems, worldviews and identities, including in New Zealand the Tangata Whenua.

Despite its fundamental importance, biodiversity continues to be lost. It is against this backdrop that the eco-system services that are inherent within the lease application will be further compromised.

Parties to the Convention on Biological Diversity, in 2010 in Nagoya, Japan, adopted the Strategic Plan for Biodiversity 2011-2020 with the purpose of inspiring broad-based action in support of biodiversity over the next decade by all countries and stakeholders. (Strategic Plan for Biodiversity - 2011–2020 and the Aichi Targets, 2010) (Strategic Plan for Biodiversity - 2011–2020 and the Aichi Targets, 2010)

Objectives of the Convention on Biological Diversity and the Aichi Targets and Comments relating to this application¹

Strategic Goal and Targets	Comment relating to the application.
Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society	Directly Relevant
Target 1: By 2020, at the latest, people are aware of the values of biodiversity and the steps they can take to conserve and use it sustainably.	Site inspections clearly indicate that the impacts from cattle grazing on the river flats and trampling and browsing in bush areas is in conflict with this internationally agreed target.
Target 2: By 2020, at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems.	The grazing provisions in the MANP Management Plan are unambiguous. DoC, in the view of this submitter, would have significant problems in terms of its statutory responsibilities, if this application was approved
Target 3: By 2020, at the latest, incentives, including subsidies, harmful to biodiversity are eliminated, phased out or reformed in order to minimize or avoid negative impacts, and positive incentives for the conservation and sustainable use of biodiversity are developed and applied, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socio-economic conditions.	<p>The DoC Web Site indicates that: “Where the total grazing activity fee is expected to be greater than \$17,000 pa, your fees will be generally be 7.5% of gross annual revenue. An independent valuation will be required. The grazing activity fees for the second and third year(s) of your concession will be increased by 2% annually”.</p> <p>Where the total grazing activity fee is expected to be between \$8,500 -</p>

	<p>\$17,000, there a number of options on which your fee may be based, including: value of the land anticipated value of the crops being planted number of stock/ value of stock being grazed. Your fee will depend on a number of factors such as whether a land valuation is available and/or whether you plan to grow crops”.</p> <p>Without access or knowledge of the fees associated with the grazing license it is difficult to comment if these fees offer concessional / subsidized grazing.</p> <p>It is, however, assumed that grazing rights are reasonably concessional and probably do not reflect the value of the land.</p>
<p>Target 4: By 2020, at the latest, Governments, business and stakeholders at all levels have taken steps to achieve or have implemented plans for sustainable production and consumption and have kept the impacts of use of natural resources well within safe ecological limits.</p>	<p>Our submissions contends that the lessee / concessionaire has failed to keep use of the lease area within safe ecological limits.</p>
<p>Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use</p>	<p>Directly Relevant</p>
<p>Target 5: By 2020, the rate of loss of all-natural habitats, including forests, is at least halved and where feasible brought close to zero, and degradation and fragmentation is significantly reduced.</p>	<p>The continuation of this lease for a further 14 years will perpetuate ecosystem degradation.</p>
<p>Target 6: By 2020 all fish and invertebrate stocks and aquatic plants are managed and harvested sustainably, legally and applying ecosystem-based approaches, so that overfishing is avoided, recovery plans and measures are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.</p>	<p>Wetland areas within the grazing lease area were inspected and obvious signs of degradation, particularly around the edges of permanent wetland communities, were observed and photographs are available if required.</p>
<p>Target 7: By 2020 areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity.</p>	<p>The submitters maintain that this target is significantly compromised by continuation of the grazing license.</p>
<p>Target 8: By 2020, pollution, including from excess nutrients, has been brought to levels that are not detrimental to ecosystem function and biodiversity.</p>	<p>The submitter suggests that nutrient levels and run-off is probably within acceptable limits. The channelling of waste from cattle yards into nearby streams is not acceptable and is</p>

	indicative of poor generally stewardship practices.
Target 9: By 2020, invasive alien species and pathways are identified and prioritized, priority species are controlled or eradicated, and measures are in place to manage pathways to prevent their introduction and establishment.	The lease area demonstrates significant areas with invasive species and displays unmistakable evidence of browsing and trampling of native species.
Target 10: By 2015, the multiple anthropogenic pressures on coral reefs, and other vulnerable ecosystems impacted by climate change or ocean acidification are minimized, so as to maintain their integrity and functioning.	Not relevant
Strategic Goal C: Improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity	Directly Relevant
Target 11: By 2020, at least 17 per cent of terrestrial and inland water, and 10 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures and integrated into the wider land- scape and seascapes.	Directly Relevant
Target 12: By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.	Status unknown
Target 13: By 2020, the genetic diversity of cultivated plants and farmed and domesticated animals and of wild relatives, including other socio-economically as well as culturally valuable species, is maintained, and strategies have been developed and implemented for minimizing genetic erosion and safeguarding their genetic diversity.	Status unknown
Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services.	Directly Relevant
Target 14: By 2020, ecosystems that provide essential services, including services related to water, and contribute to health, livelihoods and well-being, are restored and safeguarded, taking into account the needs of women, indigenous and local communities, and the poor and vulnerable.	Status unknown
Target 15: By 2020, ecosystem resilience and the contribution of biodiversity to carbon stocks has been enhanced, through conservation and restoration, including restoration of at least 15 per cent of degraded ecosystems, thereby contributing to climate change mitigation and adaptation and to combating desertification.	This is an important consideration current status is unknown
Target 16: By 2015, the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their	Not relevant

Utilization is in force and operational, consistent with national legislation.	
Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building	The Targets under this strategic goal are not relevant to this submission

The World Heritage Convention

Definition

Cultural and natural heritage is among the priceless and irreplaceable assets, not only of each nation, but of humanity as a whole. The loss, through deterioration or disappearance, of any of these most prized assets constitutes an impoverishment of the heritage of all the peoples of the world. Parts of that heritage, because of their exceptional qualities, can be considered to be of “Outstanding Universal Value” and as such worthy of special protection against the dangers which increasingly threaten them.

Source: Operational Guidelines for the Implementation of the World Heritage Convention – 2016 Version
Te Wahipounamu – South West New Zealand

Date of Inscription: 1990

Criteria: (vii)(viii)(ix)(x) Refer to <http://whc.unesco.org/en/list/551> for a description of criteria

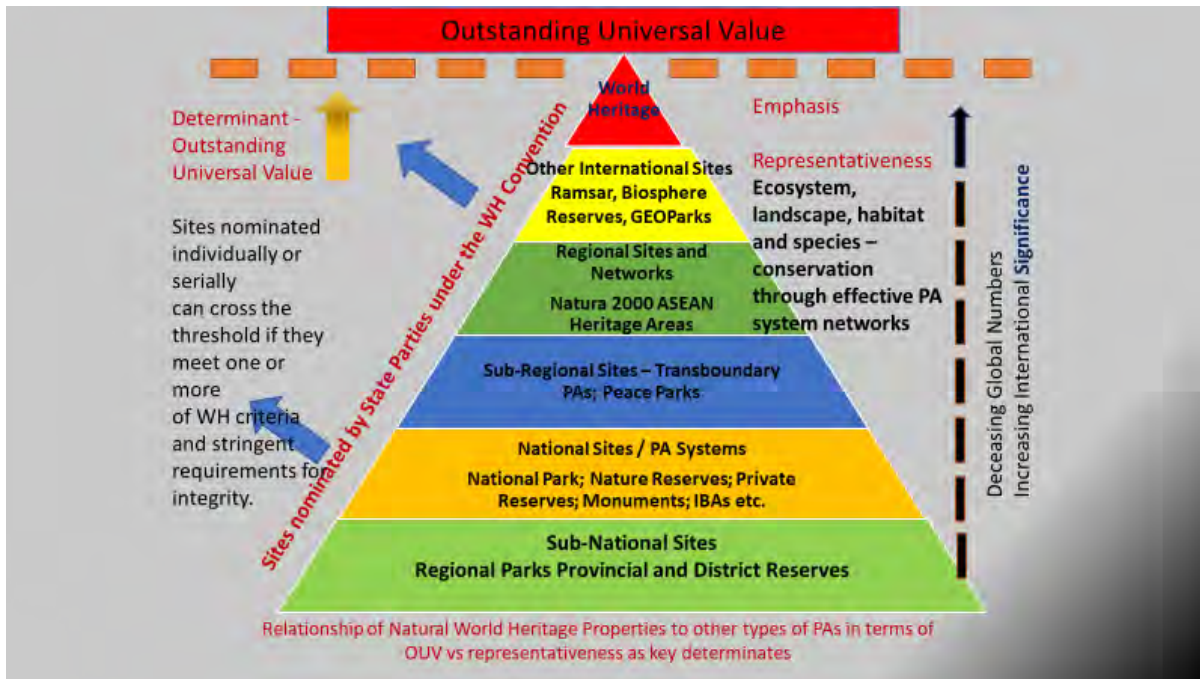
Size: 2,600,000 ha

Outstanding Universal Value

Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. As such, the permanent protection of this heritage is of the highest importance to the international community as a whole. The Committee defines the criteria for the inscription of properties on the World Heritage List. (Operational Guidelines for the Implementation of the World Heritage Convention, 2006)

Figure 2 (below) provides a schematic that illustrates the notion of Outstanding Universal Value (OUV) in relation to PA management categories. This is included in the submission to stress the international importance of a World Heritage designation – basically described as the very best of the best! All protected areas are important but a World Heritage classification signifies that these areas are not only nationally important but are recognised as biodiversity, landscape and ecosystems of global significance.

Figure 1 OUV in relation to other International, Regional and National Protected Area Categories



The Application and Conflicts with World Heritage Values.

<p>Criteria for the assessment of Outstanding Universal Value</p>	
<p>Properties listed should be the most important properties for the conservation of biological diversity. Only those properties which are the most biologically diverse and/or representative are likely to meet this criterion. The properties should contain habitats for maintaining the most diverse fauna and flora characteristic of the biogeographic province and ecosystems under consideration.</p>	<p>World Heritage sites make up some of the most important cultural and natural places in the world recognised by the UNESCO World Heritage Convention and accorded particular protection by their host nations.</p> <p>There is no argument that Te Wahipounamu – South West New Zealand adequately meets World Heritage standards and criteria. (Operational Guidelines for the Implementation of the World Heritage Convention, 2006).</p> <p>Concurrently, it is a responsibility that whenever the State Party has an opportunity to enhance the properties OUV by, for example, curtailing activities that are inappropriate to protected area and World Heritage values and objectives, it has a duty, as a signatory to the World Heritage Convention, to resume management responsibility and return areas (such as the land in this application) to a conservation focused status.</p>
<p>Each component part should contribute to the Outstanding Universal Value of the property as a whole in a substantial, scientific, readily defined and discernible way, and may include, inter alia, intangible</p>	<p>It is put forward that renewing this grazing lease compromises the property’s authenticity and integrity. These two</p>

<p>attributes. The resulting Outstanding Universal Value should be easily understood and communicated.</p>	<p>components are essential elements of the property's OUV.</p> <p>The submission maintains that there are compelling protected area management principles that need earnest consideration. Including:</p> <p>Internationally accepted protected area definition:</p> <p>A protected area is: "A clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values" (Stolton, 2013)</p> <p>Note this definition make no reference to grazing and other agricultural activities.</p> <p>Simply put it is generally accepted by PA management practitioners that "Cattle grazing is not compatible with responsible public land management".</p>
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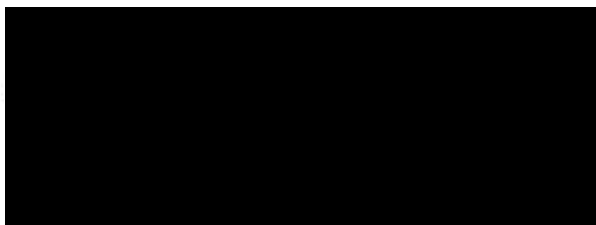
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The submitters strongly advocate that DOC, when concession applications are being considered, should consider State Party responsibilities and obligations that are inherent components of the CBD and World Heritage Conventions.

As far as we can ascertain the monitoring report, that in our opinion lacks a credible scientific basis, fails to take account of the status of the land and resources surrounding the area, which has been designated as having exceptional international and national conservation values - described in the World Heritage Convention as Outstanding Universal Value.

It would be useful to understand why a Community Relations Officer, rather than an ecologist, was tasked to carry out the monitoring report.

G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter



Date 6 June 2018

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organizational name if not submitting on behalf of a business, community group, etc.):

Address for Service (Postal Address):

Post Code:

Telephone:

Email Address:

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by:

D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one): Do / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

The whole of the application

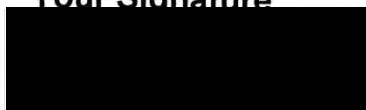
My submission is [include the reasons for your views]:

The grazing of cattle will have an adverse effect on the natural & landscape values of the area, which is a World Heritage site. Full protection from the adverse effects of cattle grazing on this 736 ha of DOC land is paramount. Cattle have a heavy footprint! Pugging of the soils & vegetation, eating native flora & impacting on the habitat of native fauna. Think of the damage if the application is granted for a further 15 years. The land is visible from the highway, a busy, popular scenic route. Fencing along the road prevents public access to the riverbed. Absolutely no need to graze this land.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Decline the application and allow the land to recover, regenerate. After 150 yrs of historic grazing, the grazing concession should be terminated, for good.

G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter

Printed name of submitter or person authorised to sign on behalf of submitter

Date

25 May 2018

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

1. A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

2. B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

3. C.

[REDACTED]

4. D. Statement of Support/Opposition

I **Oppose** this Application.

5. E. Hearing Request

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

6. F. Submission

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

The whole of it

My submission is:

For a number of years I have had reports from friends in South Westland concerning the grazing of stock along the Haast River. These people have had ongoing concerns about stock in waterways and riparian margins being degraded. I have also heard that there is evidence of stock in the Mt Aspiring National Park. I am thus pleased to be given the chance to express my views on this application for renewal of a grazing licence for the Haast River.

I have the following to say:

1. The area of this application is entirely inside Te Waahipounamu South West New Zealand World Heritage Area, recognised internationally by UNESCO. It directly abuts Mt Aspiring National Park. The highly scenic World Heritage Highway, SHW 6, runs beside and through the area of this application and is unfortunately being compromised by this large grazing licence. This grazing licence has been operating for 150 years, well, well past its use-by date, and the future must be considered. The Department has only one option - to reclaim that land to recreate a holistic aura of protected Gondwana heritage in this area.
2. Braided rivers: Too many of our rivers are highly compromised by farming in their lower reaches, yet here is a braided lower river within highly-classified conservation lands being grazed. The Haast River is a spectacular braided river in its lower reaches. Braided rivers of this magnitude are not abundant on the West Coast yet it appears to be these very braids that are the grazing licence, with no, or very few, trees remaining on them. As a back-country wanderer I come across many little islands, up river systems, where beautiful ecosystems exist - dwarf beech and low-stature trees with river grasses and herbs on sandy, pebbly ground. The larger braids within the grazing licence are denied this right to exist. Braided rivers are highly prone to invasive species, and allowing grazing opens the river up to such invasion.
3. The forest: Palatable species have been grazed and thus the stability of the forest ecosystem has been undermined, making it more vulnerable to natural hazards. Added to that grazing is debarking of roots of trees by trampling, and trampling of seedlings. There will be a slow degeneration of the forest that may not be very noticeable in the relatively short timeframe of 150 years.
4. The Edge Effect: It is a well-known ecological fact that in order to protect indigenous values a buffer zone must be allowed around areas under protection. Anthropogenic edges allow influx of weeds and pests. That this grazing licence grazes the borders of, and is also within, such important conservation areas creates a very undesirable edge in terms of protecting natural values.
5. Riparian margins: The Department is well aware that riparian margins protect waterways and the aquatic ecosystems within. There are many riparian margins in the grazing licence area (all those islands within the river, lots of little waterways running into the river) which are mostly unfenced. Many of those waterways will be spawning grounds for galaxiids, where such areas are favoured by the rare koaro.
6. Swamp: The stock will have destroyed swamp areas, for example, in the lee of natural levees, known to be refuge for the rare kokopu.
7. There is a high probability that rare populations of non-migratory galaxiids have been destroyed by this pattern of constant grazing where swampy areas have become pug-baths. There may also be mudfish, but there is no ecological report or historical data to either confirm or deny.
8. The report by Andrew Wells is that of a community relations officer, not an ecologist. This report could be acceptable for a small area somewhere else, but this is an application for a grazing licence for 736 hectares of conservation land which directly borders the Mt Aspiring National Park.
9. There is grazing land on the true right bank that, according to Mr Wells, is only accessible by boat - so how does the stock get across? Mr Wells forgets to mention the island braids which are also accessed by the stock. DOC should not be sanctioning stock within its borders using river crossings, nor allowing grazing of river braids.
10. Mr Wells says that this grazing licence is important to ensure employment of 3. The grazing of those low numbers of stock will require minimal human input, especially relative to the extent of Mr Cowan's farming activities elsewhere. I can understand Mr Cowan's stand. He has used this area for quite some time and has probably come to regard the grazing area more or less as his and his expectation is that the status quo will continue. His options are to reduce stock numbers or find alternative grazing and fodder in more suitable places. Evidently Mr Cowan is one of, if not the, largest land-owner in the Haast area. Losing this grazing licence may cause him some pain but unlikely undue hardship.
11. Public access: According to Mr Wells a 3-wire electric fence prevents public access everywhere except a few entry points. I see this as essentially privatisation of our public lands. This internationally-renowned scenic highway should have no fences denying access to public land, especially in such an important conservation area.



12. Scenic value: Evidently Mr Cowan considers that a pastoral landscape is the expected and accepted landscape for this area. It is high time that the focus of this area being national park and Te Waahiopounamu is given the proper perspective. A pastoral scene has no place here. If the public wants a pastoral scene then there is an over-abundance of such scenes throughout new Zealand. This area must be reclaimed to recreate the depth of its original scenic beauty.
13. The Department must adhere to its statutes and policies; for example the following extract from South West New Zealand Conservation Outlook Assessment: Section 2: Threats of the Te Waahipounamu; September 2017 :
 1. **'Other areas (e.g. Haast Valley) have been subject to short term grazing lease renewal so there is an opportunity to terminate these leases to protect water and forest margins from further degradation.'** The opportunity is **NOW**.

The Department has revoked other grazing licences in the area in recent years and now is the pre-eminent time to revoke this licence to regain the beauty of this outstanding landscape.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

There is only one option, to have the application declined, for the reasons outlined above.

[Redacted]

[Handwritten signature]
[Redacted]

[Redacted]



A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Address for Service (Postal Address):

Post Code:

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** wish to be heard in support of this submission at a hearing.

F. Submission

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

Presence of cattle in a World Heritage Area and a National Park.

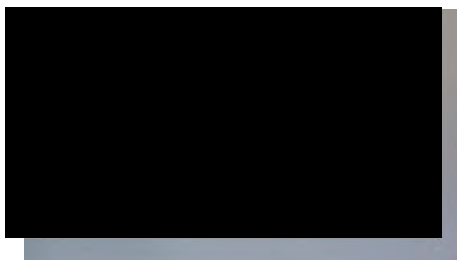
My submission is [include the reasons for your views]:

Grazing cattle browse native plants, they pollute and damage waterways, they cause soil erosion of waterway banks, and they trample native seedlings. They do not belong in a WHA and National Park of New Zealand. The damage they cause is enormous compared to the benefit gained by a select minority. Absolute priority should be given to the protection of the environment not agriculture in this protected area.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I do not wish for there to be any grazing animals.

G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter
Suzanne Hills

Printed name of submitter or person authorised to sign on behalf of submitter

28 May 2019

Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

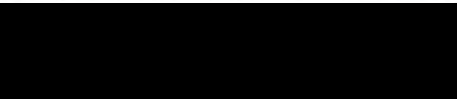
A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

 name if submitting on behalf of a business, community group, etc.):

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) / **Oppose** this Application.

E. Hearing Request

I (circle one **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

My submission is [include the reasons for your views]:

That any grazing by farming should not be allowed. That this is an area either in a National Park or very close to it. Grazing in a major river valley is not OK, all poo from the animals is being added to the water.

Any unwanted weeds will have been added to the valley by the grazing animals

I recently travelled that route to the West Coast and noticed the fencing alongside SH6 for many kilometres, which looks totally out of place in that environment/area.

Also the animals will be grazing regenerating Native forest. NZ has already lost too much of our unique Native forests..

NZ can make more income from Tourism, than grazing a few animals in this area.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

All grazing should be disallowed.

The fence along SH6 and any other farming buildings/fencing should be removed.

All introduced weed species removed.

Signature of submitter or person authorised to sign on behalf of submitter

Lesley Anderson

Printed name of submitter or person authorised to sign on behalf of submitter

24 May 2018

Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor

26 May 2018

Department of Conservation
Hokitika Shared Service Centre
Attention: Chari Taylor



Email: chtaylor@doc.govt.nz

Dear Ms Taylor

Application 63919-GRA for a grazing licence by John B Cowan

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents some 20,000 members of tramping, mountaineering, climbing and other outdoor recreation clubs throughout NZ, and indirectly represents the interests and concerns of many thousands of private individuals who also enjoy recreation in the back country.

FMC objects to the proposal to grant a concession in the terms stated on the Officer's Report.

Concessions are required to be considered against the purpose for which the land is held. This land is stewardship land and as such is held for conservation purposes. Further, it is either part of or adjacent to the Te Wahi Pounamu World Heritage Area. With the increasing understanding of the deleterious effect of cattle grazing on both forest ecosystems and waterways, it is clear that it is incompatible with conservation purposes. The fact that this is an existing use is irrelevant.

The land affected by the concession is, for the large part, adjacent to areas of Mount Aspiring National Park alongside State Highway 6 and on the true right bank of the Haast River. The Mount Aspiring National Park National Park Management Plan does not allow grazing in this locale. The only way to prevent cattle straying into the park is by using many kilometres of electric fence. In the unlikely event of the applicant agreeing to take this measure, the problem of stock straying into the park would be replaced by one of the applicant preventing public access to large swathes of the park. Neither are acceptable solutions.



As granting this concession would require the Department to overlook the purpose for which the land is held and would have unwanted effects on the national park – either uncontrolled stock access or hindrance of public access – the only reasonable option open to the Department is to decline the application.

[REDACTED]

[REDACTED]
[REDACTED]

Executive member dealing with this matter:

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I **Oppose** this Application.

E. Hearing Request

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

F. Submission

The specific parts of the application that this submission relates to are: all of it.

My submission is [include the reasons for your views]:

that the application for permission to graze 736 hectares within the Haast Valley known as “Area B” be declined. I am personally familiar with the area alongside the World Heritage Highway – a magnificent scenic drive – and the adjacent river flats. The signs of vegetation modification (eaten-out native shrubbery, and lots of exotic weeds) and ongoing surface damage from years of grazing are readily apparent, and stand in marked contrast to ungrazed areas outside the application area. The electric fence alongside the road is visually discrepant with any sense of travelling through a natural environment, as well as being a damned nuisance for anyone wanting to stop by the roadside and make their way out to the river flats for the awesome view. It is time to keep the cattle out and let this area recover. In time the quality of the landscape will improve, to the benefit of the many visitors to the region. This will more than offset the effects on the applicant of having to find alternative grazing or other feed for some of his cattle.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The outcome that I seek is for there to be no cattle grazing permitted on Conservation land within the Haast River valley above the Roaring Billy.

G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter

Printed name of submitter or person authorised to sign on behalf of submitter

Date: 28/5/2018

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Rebecca Beaumont

From: Chari Taylor
Sent: Tuesday, 29 May 2018 1:17 p.m.
To: Rebecca Beaumont
Subject: FW: Application to graze conservation land in Haast River valley

Follow Up Flag: Follow up
Flag Status: Flagged

From: [REDACTED]
Sent: Tuesday, 29 May 2018 12:54 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Application to graze conservation land in Haast River valley

Good afternoon,

I hear there is an application to your office for grazing on a large area of conservation land in the Haast River valley area.

The Haast river is part of a braided river ecosystem. As you'll be aware, these are rare and unique ecosystems. This one is a home for birds such as the wrybill and banded dottrel, that are under increasing threat. There will be indigenous plants too, some very small and vulnerable to trampling and disruption caused by large animals, as well as indigenous insects and reptiles. Grazing is indiscriminate and puts the whole ecosystem under threat. I'm concerned for every part of this ecosystem. The health of these particular birds is highly important.

I urge you to decline this application. Thank you.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

Rebecca Beaumont

From: Chari Taylor
Sent: Tuesday, 29 May 2018 1:51 p.m.
To: Rebecca Beaumont
Subject: FW: Cattle in Mt Aspiring National Park

From: [REDACTED]
Sent: Tuesday, 29 May 2018 1:43 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: [REDACTED]

Hi there

I am opposed to cattle grazing in our National Parks. Their presence damages the ecosystem so well protected for our native species.

Please let me know if I need to provide any additional info for ammunition against application for cattle grazing

Thanks

[REDACTED]

Rebecca Beaumont

From: Chari Taylor
Sent: Tuesday, 29 May 2018 1:51 p.m.
To: Rebecca Beaumont
Subject: FW: Cattle grazing in Mt Aspiring National Park

From: [REDACTED]
Sent: Tuesday, 29 May 2018 1:46 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Cattle grazing in Mt Aspiring National Park

Department of Conservation
To Whom it May concern,

Re: Cattle Grazing Within Mt. Aspiring National Park

I am writing to ask DOC to decline an application to graze a huge area of conservation land in the Haast River valley.

This is a rare braided river ecosystem, home to vulnerable birds like the wrybill and the banded dotterel. When cattle trample nests on public conservation land, where can our birds be safe?

In addition, inadequate fencing means cattle get into forest of the National Park. This leads to degradation of the natural landscape and the potential for invasion of unwanted exotic weed species spread by grazing bovines.

Rebecca Beaumont

From: Chari Taylor
Sent: Tuesday, 29 May 2018 2:40 p.m.
To: Rebecca Beaumont
Subject: FW: Cattle in Mt Aspiring National Park

From: c [REDACTED]
Sent: Tuesday, 29 May 2018 2:34 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Cattle in Mt Aspiring National Park

I believe the Department of Conservation should decline the application to graze an area of conservation land in the Haast River valley.

This is a rare braided river ecosystem, home to vulnerable birds like the wrybill and the banded dotterel. It is inappropriate to allow cattle to graze and trample on conservation land

In addition, inadequate fencing means cattle get into forest of the National Park.

[REDACTED]

Sent from Yahoo Mail for iPhone



A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

[Redacted submitter information]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) ~~Support~~ / ~~Neutral~~ / **Oppose** this Application.

E. Hearing Request

I (circle one): ~~Do~~ / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

Any grazing of cattle in such a sensitive conservation area is in-appropriate.

My submission is [include the reasons for your views]:

I believe it would be insanity to grant this application as this area has a stunning mostly un-touched environment.

This sensitive area is NOT appropriate for cattle farming and especially across the proposed size and scale of area.

This southland forest area is very delicate and the water ways are insanely pure with rare braided river ecosystem, home to vulnerable birds. When cattle trample nests on public conservation land, where can our birds be safe? I would think New Zealand would want to keep it this way forever.

In addition, inadequate fencing means cattle get into forest of the National Park.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

15 years is just way to long for a grazing license and it would be much more appropriate to shorten this time period significantly with a view to phasing out 100% in a much shorter time-span.

█ ██████████

█ ██████████

██
Signature of submitter or person authorised to sign on behalf of submitter

██
Printed name of submitter or person authorised to sign on behalf of submitter

29 May 2018 _____
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor



Director-General
Department of Conservation
Hokitika Shared Service Centre
Private Bag 701
Hokitika 7842

Attention: Chari Taylor

Email: chtaylor@doc.govt.nz

Submission on application for a licence to graze cattle on 736 Hectares within the Cook River to Haast River Conservation Area. Haast River Valley, between the Roaring Billy and the confluence of the Landsborough River.

We think DOC should decline this application.

Under the Conservation Act 1987, section 6, DOC has to manage the land for conservation purposes, and preserve all indigenous freshwater fisheries, and protect recreational freshwater fisheries and freshwater fish habitats.

The Tai Poutini West Coast Conservation Strategy (CMS) identifies grazing as a threat to freshwater biodiversity values (3.3.1.5) and states:

Vegetation clearance, damage or weed invasion in riparian zones reduces or negates the benefits that riparian zones provide for people, as well as affecting the overall quality of freshwater ecosystems for wildlife, fish and other organisms.(3.3.1.5)

damage to fish spawning sites, introduction and spread of invasive weeds and browsing animals and degradation of coastal wetlands and natural coastal dune sequences, including grasslands and sedgeland (e.g. via agricultural development involving drainage, grassing, grazing and stocking of such areas) (3.3.1.7)

Allowing grazing of cattle in this spectacular part of the Te Wahipounamu World Heritage Site is contrary to DOC's core function. Cattle cause ecological degradation and defecate in the waterways. The current government have heralded clean streams – this is contrary to that outcome. Continual grazing in a riverbed results in trampled plants and poor soil structure and degraded riparian zones. It will destroy any wetlands in the area. Not only do cattle pug the soil, but they also stop regeneration of native forest. Over time introduced weeds and grasses will out-compete the native vegetation. Both wrybill and banded dotterel live in this area – both these birds need more protection as opposed to their habitat being destroyed by grazing cattle. The applicant suggests that there's no degradation due to his cattle – this is ridiculous.

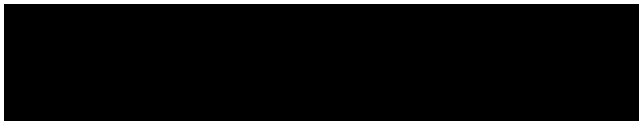
The map in the application clearly shows that the cattle are grazing in Mt Aspiring National Park, alongside the highway – completely contrary to section Section 6.7.5 of the Management Plan for Mt Aspiring National Park, and in contravention of the National Parks Act.

The annual monitoring report from 2015 is perfunctory. DOC has not done an independent assessment of the currently grazed area, which should be conducted to see the amount of damage which has already been done in the area. Just because this grazing has happened in the past does not mean it is acceptable today or in the future.

The New Zealand public has demonstrated a real appetite for cleaning up our waterways. Dairy farmers have been singled out in lowland areas but surely we should be taking a proactive approach and removing cattle from the Haast riverbed, an iconic riverine location adjacent to a major highway.

Under the Conservation Act 1987, Section 17U 2b, the Minister should decline the application as it is impossible to remedy, avoid, or mitigate the adverse effects of this grazing activity.

We would like DOC to decline this application for grazing.
We do not wish to be heard at a hearing.



Rebecca Beaumont

From: Chari Taylor
Sent: Wednesday, 30 May 2018 10:16 a.m.
To: Rebecca Beaumont
Subject: FW: Submission Regarding 63919-GRA John B Cowan

From: [REDACTED]
Sent: Tuesday, 29 May 2018 8:51 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Submission Regarding 63919-GRA John B Cowan

A. Permission Application Number and Name of Applicant

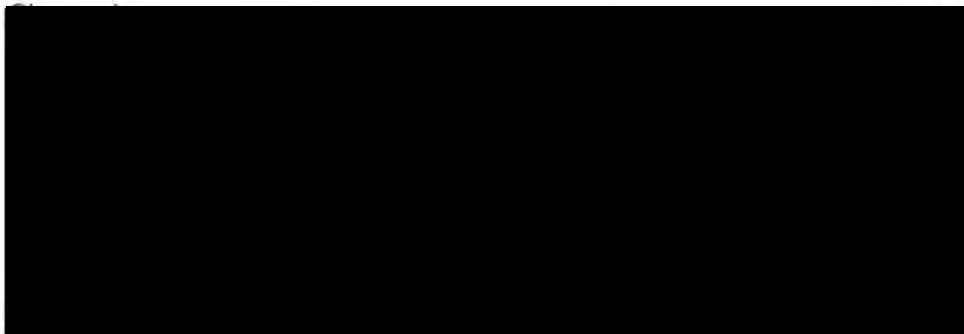
63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):



D. Statement of Support/Opposition

I **Oppose** this Application.

E. Hearing Request

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

F. Submission

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

My submission is [include the reasons for your views]:

I oppose the application for cattle grazing in the Haast River valley as the area specified is a rare braided river ecosystem. I am concerned that birds such as the wrybill and the banded dotterel will be negatively effected by cattle grazing as they nest on the ground and their nests may be trampled by cattle. These birds are vulnerable and their population is decreasing.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That cattle are not allowed to graze on the braided river flat

Date: 29th May 2018



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

Notes to Submitter:

Please download and complete this form, scan and send to submissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor. chtaylor@doc.govt.nz

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5pm Thursday 31st May 2018.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

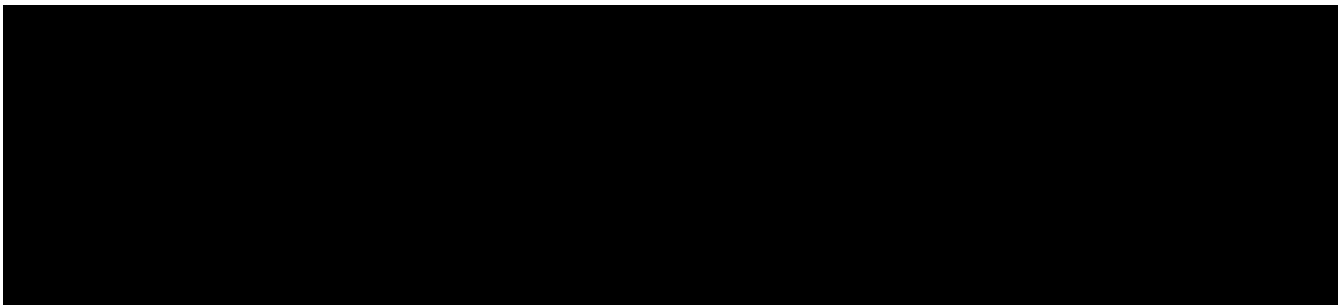
Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.



Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

The whole application.

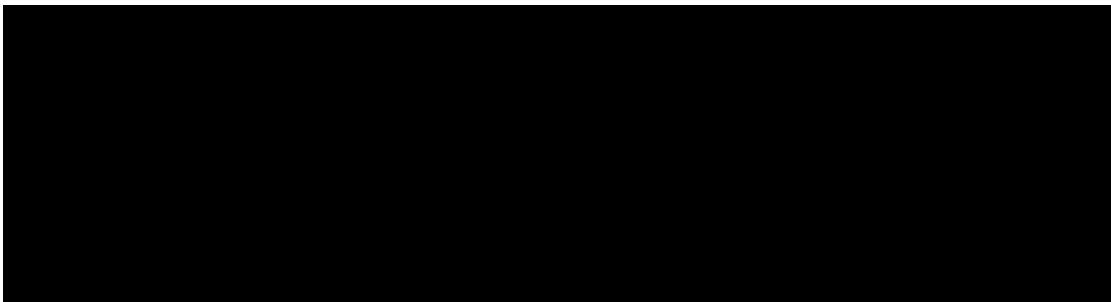
My submission is [include the reasons for your views]:

I feel it is inappropriate to have cattle grazing in this part of Haast with risks of damage to braided river systems and bird habitat, especially with potential for cattle to get into the National Park

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The application should be declined

G. Your Signature



Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Rebecca Beaumont

Subject: FW: Proposed grazing : Mt Aspiring National Park : Haast River Valley

From: [REDACTED]

Sent: Wednesday, 30 May 2018 11:24 a.m.

To: Chari Taylor <chtaylor@doc.govt.nz>

Subject: Re: Proposed grazing : Mt Aspiring National Park : Haast River Valley

Good morning, Chari

I am prevented by circumstances from asking to be heard.

Thank you.

regards
[REDACTED]

On Wed, May 30, 2018 at 11:01 AM, Chari Taylor <chtaylor@doc.govt.nz> wrote:

Thanks for your email. Please state whether you wish to be heard or not?

Thanks,

Chari
[REDACTED]

From: [REDACTED]

Sent: Tuesday, 29 May 2018 2:50 p.m.

To: Chari Taylor <chtaylor@doc.govt.nz>

Subject: Proposed grazing : Mt Aspiring National Park : Haast River Valley

Good afternoon

I understand that you have received an application to graze cattle in the Haast River Valley.

I urgently request that you deny this application for the following reasons :

1. Having been a dairy farmer's daughter, I am totally familiar with the damage that cattle's feet can cause in churning and pock-marking the ground . The damage, as you know, can be irreversible on some soils.
2. And what effect would all that cattle poo have when it washes into the river and heads off downstream ?
3. And would the enrichment provided by the poo on the dry land area cause imbalances in the naturally existing flora ? Could the cattle introduce weed species in their poo initially ?
- 4.. This is a rare braided river area on which native birds nest . Cattle would simply trample their nests. Too many of our precious native birds are already at risk : why would we willingly endanger more of them ?
5. Longer-term, cattle could destroy the structure and natural flow of the waterways with their heavy tread..
3. Can you guarantee that the fencing that would contain the beasts is in excellent condition? or is there a risk that they would push through into the National Park ? It would be not so easy to round them up and remove them once they got into the Park, and in the meantime they would be causing damage to plants and soil structure.

Please consider these points, along with input from others. My opinion is that granting the application for grazing would be most unwise.

Regards



Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Rebecca Beaumont

Subject: FW: Cattle in Mt Aspiring National Park

-----Original Message-----

From: david [REDACTED]
Sent: Wednesday, 30 May 2018 11:46 a.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Re: Cattle in Mt Aspiring National Park

Thanks Chari

yes, I intended it to be a short submission in support of Forest and Bird.
Is it OK just like that?

I won't be appearing, thanks.

regards

[REDACTED]

[REDACTED]

-----Original Message-----

From: Chari Taylor
Sent: Wednesday, May 30, 2018 11:03 AM
To: [REDACTED]
Subject: RE: Cattle in Mt Aspiring National Park

[REDACTED]

Thanks for your email. Can you please confirm if your email is a submission in relation to an application currently notified by the Department? If so, which application is it?
It may be that it relates to the application to graze the Haast Valley by John Cowan. You can find further information on the notified applications

at:

<https://www.doc.govt.nz/get-involved/have-your-say/open-for-your-comment/>

Also please state whether you wish to be heard or not?

■
Regards,
Chari

-----Original Message-----

From: David <davidyoungwriter@xtra.co.nz>
Sent: Tuesday, 29 May 2018 3:58 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Cattle in Mt Aspiring National Park

Most briefly, surely the days of this kind of farming have to be over?
I realise that in some circumstances, cattle can keep down weeds.
In a place like this, their main effect through grazing will be to reduce natural regeneration.
In a national park? Time to say firmly, 'no'.

Sent from my iPad

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Rebecca Beaumont

From: Chari Taylor
Sent: Wednesday, 6 June 2018 1:46 p.m.
To: Rebecca Beaumont
Subject: FW: Attention Chari Taylor

From: [REDACTED]
Sent: Tuesday, 29 May 2018 7:59 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Attention Chari Taylor

Director-General
Department of Conservation
Hokitika Shared Service Centre
Private Bag 701
Hokitika 7842

Attention: Chari Taylor

I oppose the application by John B Cowan for the grazing of stock on conservation land in the Hast River Valley. New Zealand has limited protected conservation land and the disruption and destruction these cattle will cause to the ecosystem, plants and animals far out weighs any benefit that one person will gain from grazing this conservation land.

Regards,

[REDACTED]

Rebecca Beaumont

Subject: FW: Submission

From: [REDACTED]
Sent: Wednesday, 30 May 2018 12:50 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Re: Submission

Do. Of wish to be heard [REDACTED]

On Wed, 30 May 2018, 11:38 a.m. Chari Taylor, <chtaylor@doc.govt.nz> wrote:

Thanks and can you please state whether you wish to be heard or not?

From: [REDACTED]
Sent: Wednesday, 30 May 2018 11:19 a.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Re: Submission

Sorry yes it relates to John Cowan submission

On Wed, 30 May 2018, 11:12 a.m. Chari Taylor, <chtaylor@doc.govt.nz> wrote:

Thanks for your email. Can you please confirm if your email is a submission in relation to an application currently notified by the Department? If so, which application is it?

It may be that it relates to the application to graze the Haast Valley by John Cowan. You can find further information on the notified applications at:

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 29 May 2018 9:38 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Submission

I do not support this proposal

[REDACTED]

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Rebecca Beaumont

Subject: Application for a licence by John B 63919-GRA John B Cowan

From: [REDACTED]
Sent: Wednesday, 30 May 2018 11:23 a.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: RE: Application for a licence by John B 63919-GRA John B Cowan

No, I don't need to make an oral submission as well.

Thanks,

[REDACTED]

----- Original Message -----

From: "Chari Taylor" <chtaylor@doc.govt.nz>

To: [REDACTED]
Cc: [REDACTED]

Sent: Tue, 29 May 2018 23:14:56 +0000
Subject: RE: Application for a licence by John B 63919-GRA John B Cowan

[REDACTED]

Thank you for your email, but can you please state weather you wish to be heard or not?

Regards,

Chari

From: [REDACTED]
Sent: Tuesday, 29 May 2018 9:58 p.m.
To: Chari Taylor <chtaylor@doc.govt.nz>
Subject: Application for a licence by John B 63919-GRA John B Cowan

[REDACTED]

Given:

a) the well-known issues of cattle defecating & urinating in rivers; and

b) the use of braided rivers as a nesting site for some of our native birds; and

c) that National Parks shall be preserved as far as possible in their natural state (National Parks Act 1980, 4.2a)

Then, the conditions of the concession must include that:

i) the grazing area is fully fenced to keep cattle out of all waterways and the national park; and

ii) riparian strips are planted with appropriate native vegetation; and

iii) the licence forfeited if i) and ii) are not maintained

I oppose this application, unless the conditions above are satisfied

[Redacted]

[Redacted]

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.



COMMENT SUBMISSION FORM

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

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

Notes to Submitter:

Please download and complete this form, scan and send to submissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor. chtaylor@doc.govt.nz

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5pm Thursday 31st May 2018.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

[Redacted]
[Redacted]
[Redacted]
[Redacted]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

Grazing of area B

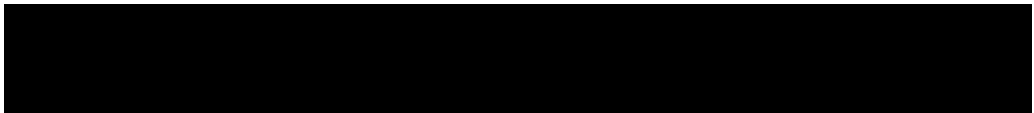
My submission is [include the reasons for your views]:

I oppose the application for cattle grazing in the Haast River valley as the area specified is a rare braided river ecosystem. I am concerned that birds such as the wrybill and the banded dotterel will be negatively affected by cattle grazing as they nest on the ground and their nests may be trampled by cattle. These birds are vulnerable and their population is decreasing

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

For the application to be declined unless absolute risk mitigation is ensured

G. Your Signature

 _____




30/5/2018 _____
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

COMMENT SUBMISSION FORM
**Publicly notified application for leases,
licences, permits, or easements.**

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

[REDACTED]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

Grazing in a World Heritage Area

My submission is [include the reasons for your views]:

That the application should be declined.

The application area lies within the World Heritage Area and lies beside the World Heritage Highway, a highly scenic route with stunning South Westland landscapes.

Although cattle have been grazing here for many years, DOC now has an opportunity to protect the landscape and its flora and fauna from grazing and to present a more natural landscape to visitors. When visitors come to South Westland, they come for the natural landscape – vast valleys, towering snow-capped mountains, glaciers and pristine glacier-fed braided rivers. Cows ranging across valley floors detract from that vista across the World Heritage Area and leave visitors wondering why cows would be allowed to roam free in such areas, potentially into areas of Mount Aspiring National Park.

DOC has a responsibility under the UNESCO World Heritage Area agreement to maintain the area appropriately. 10-15 years ago, DOC was working to remove grazing from some of these areas, e.g. the Landsborough Valley, and that work appears to have stalled.

Damage by cattle includes:

- pugging and trampling of soil,
- collapse of river banks and erosion,
- browsing of native plants and the loss of seedlings so that numbers of replacement native trees and understory species are reduced,
- the spread of weeds, and
- habitat loss arising from other effects.

Cattle standing in watercourses draws disbelief from visitors, as they wonder how that fits with the pristine image of New Zealand they came to see and experience. The pollution of freshwater by cow effluent has been understood for nearly a century. Certainly the effects are far far lower for this level of grazing when compared to dairy farming, but visitors are unlikely to know the difference and will equate cattle in water with pollution.

Cattle and grazing are detrimental to the natural environment and to the natural landscape.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Grazing be discontinued
Fencing to be removed
Weeds be eradicated

G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter



Printed name of submitter or person authorised to sign on behalf of submitter

____ 30 MAY 2018 _____
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor

A. Permission Application Number and Name of Applicant

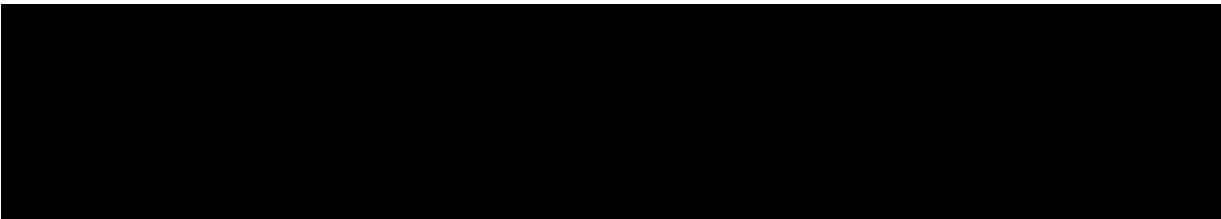
63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):
John Langley



Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

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

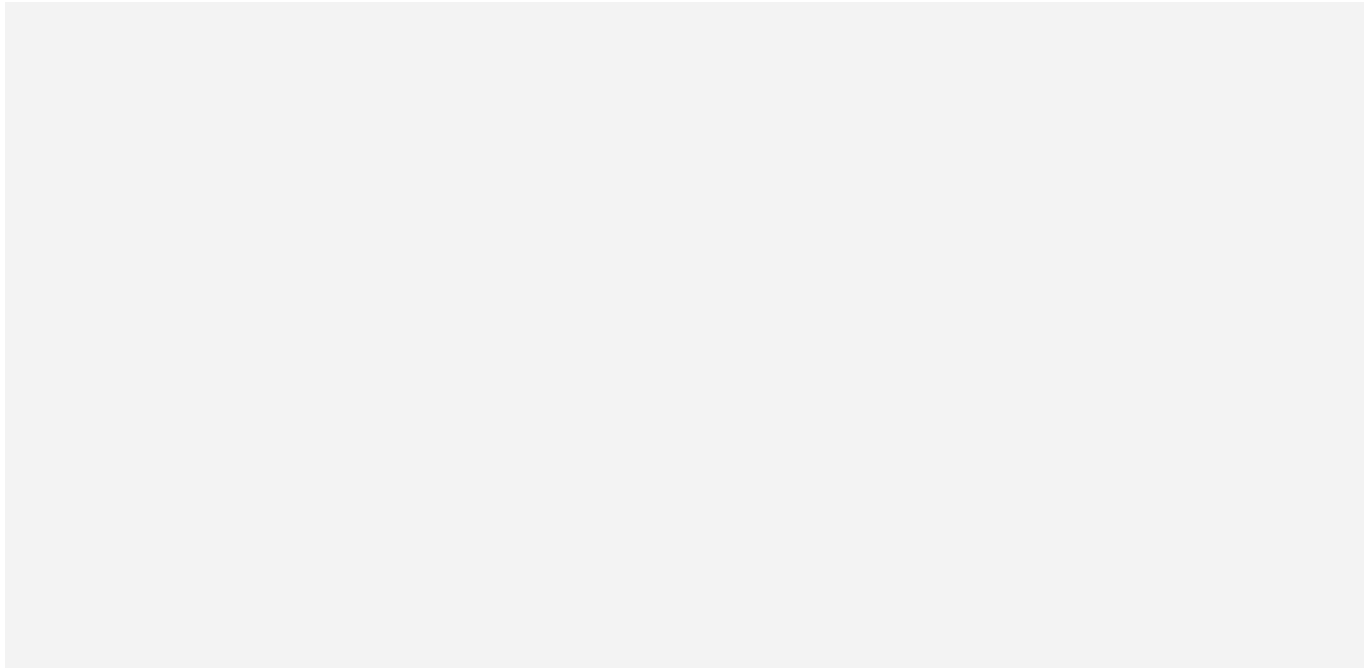
F. Submission

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

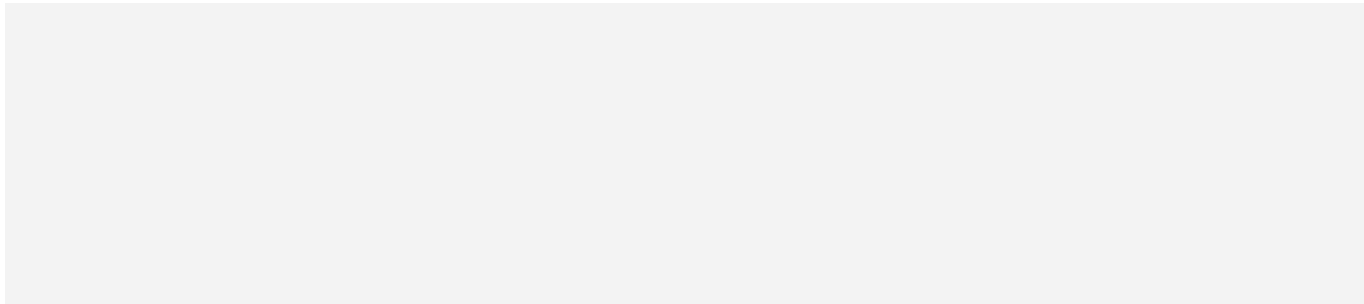
The entire application

My submission is [include the reasons for your views]:

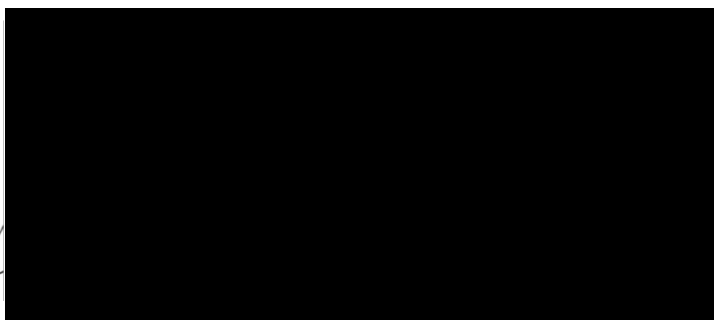
I strongly object cattle being grazed in any national park. I find it extremely ironic that DoC spend millions managing human feaces in our national parks but allow cattle to defecate without any controls in our National Parks and especially in the rivers and streams. Aside from the pollution issue DoC is essentially facillitating meat consumption. A reduction in meat consumption is one important ways the public can reduce their carbon footprint. DoC should be showiing some leadership in this respect.



What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:



G. Your Signature



Signature of submitter or person authorised to sign on behalf of submitter



Submitter or person authorised to sign on behalf of submitter

_31 May 2018-05-30_____
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. [Redacted]
[Redacted] *eld*
[Redacted] *South 10*
[Redacted] *1667* *govt*
[Redacted]
[Redacted]

[Redacted] ~~Neutral / Oppose~~ [Redacted]

[Redacted]
[Redacted] ~~Do Not~~ [Redacted]

[Redacted]
[Redacted]

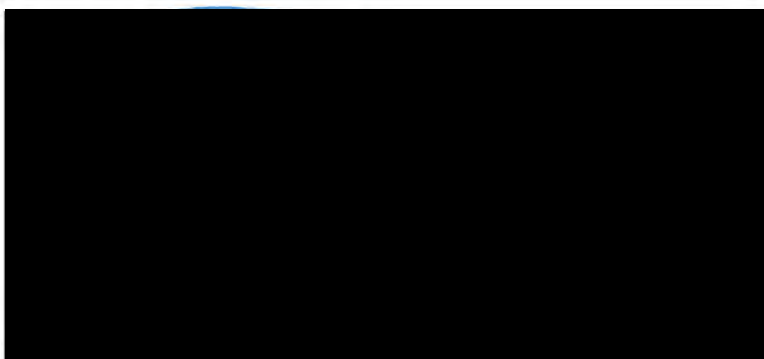
My submission is [include the reasons for your views]:

This area has a long history of grazing and has been well managed. The environmental effects are minimal, and are far outweighed by the positive impacts of the social and economic benefits this family-run farm provide to the community.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

A continuation of the current licence.

G. Your Signature



half of submitter

behalf of submitter

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

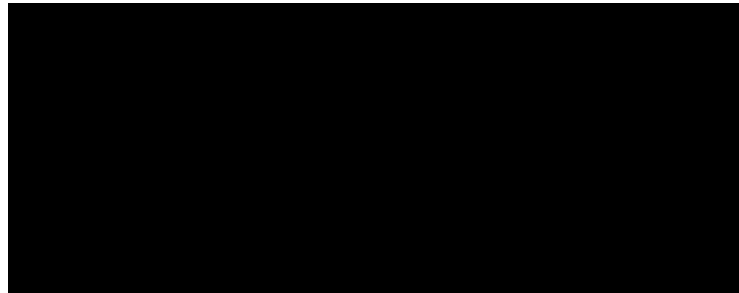
SUBMISSION ON AN APPLICATION BY JOHN B COWAN FOR A GRAZING LICENCE CONCESSION AT HAAST VALLEY, 2018

■ The Director General
Hokitika Shared Services Centre

Department of Conservation
Private Bag 701
Hokitika 7842

ATTN: Chari Taylor

BY EMAIL: chtaylor@doc.govt.nz



- 1 The Environmental Defence Society (EDS) welcomes the opportunity to submit on Mr John Cowan's application to renew his grazing licence on the upper Haast Valley for a further fifteen years. Public notification shows that the Department of Conservation (DOC) is considering whether or not continued cattle grazing on the upper Haast Valley, an area of public conservation land within the Mt Aspiring National Park and a UNESCO World Natural Heritage Area¹, is acceptable. EDS submits that it is not and accordingly opposes the licence application.

SUMMARY

- 2 New Zealand's braided riverbeds are threatened and internationally rare. The main threats are habitat loss caused by agriculture and hydro-electric power development and introduced predators. While only a few South Westland rivers have been impacted by hydro-electric power development, almost all the valleys have suffered habitat loss and degradation caused by farming cattle. This happened despite the protection afforded public conservation land under the Conservation Act 1987. Grazing leases such as that on the Upper Haast cause impacts on intrinsic values and recreational enjoyment inconsistent with the purposes for which the land is held. The lease renewal application, its 'Assessment of Affects Extension' (AAE), and the DOC monitoring report demonstrate failure to properly address these important matters.
- 3 In February 2017 and again in 2018 EDS staff visited South Westland and spent time at a number of sites, including the Haast River valley. We observed:
 - Serious damage to native vegetation caused by cattle trampling and grazing including dieback, loss of palatable broadleaved species, and forest understorey degradation
 - Cattle in and around otherwise pristine streams and river channels.
 - Cattle faeces in waterways.
 - Cattle grazing within parts of Mt Aspiring National Park located between SH6 and the Haast riverbed.
 - Electric fencing and barely functional gates that obstructed access from SH6 to the riverbed.



- 4 It is entirely inappropriate for DOC to be facilitating the presence of cattle in the Haast River on public conservation land and within a National Park and UNESCO World Natural Heritage Area, while central government is simultaneously pursuing regulations to ensure stock is excluded from freshwater.

ANALYSIS

Impact assessment

- 5 The AAE is inadequate. The only effects assessment that appears to have been provided is the opinion of the applicant in response to further information requests.² This is entirely inadequate for an activity on public conservation land and within a National Park and World National Heritage Area.
- 6 DOC's monitoring reporting, which is the only assessment by DOC of the environmental effects of the activity and its consistency with statutory protections, is also inadequate:
 - It concludes that the "...impacts on conservation values are considered to be minor and of a nature to be expected from the activity" but there is no analysis of what level of damage would be more than minor or not acceptable. Further, that the impacts are of a nature expected from the activity is not relevant, nor that the effects are consistent with a long history of grazing or have not increased since last inspection. The question is whether the activity and its environmental effects are acceptable in the 2018 context. EDS submits they are not.
 - No assessment of effects on the right side of the River has been undertaken.
 - It fails to identify the extent of cattle incursion and damage to native vegetation within the Mt Aspiring National Park.
 - It fails to identify and establish the wider environmental context for the grazing licence. Specifically (a) it does not consider the percentage of lowland (below 100m) South Westland braided river valleys that are free of cattle grazing and what retirement of upper Haast grazing might contribute to this is not considered; (b) it does not consider effects on values of the Mt Aspiring National Park or the Haast UNESCO World Heritage Area.
 - No proper analysis of impacts on freshwater quality or ecosystem health have been undertaken.
 - It identifies that stock could disturb nesting ground birds but makes no effort to assess this.
- 7 The misalignment between our observations (at [3]) and DOC's, and the monitoring report's inadequacies do not align with an assessment of the application consistent with the public interest in environmental protection as reflected by the Conservation Act 1987, the National Parks Act, the Mt Aspiring National Park Management Plan, and the identification of the site as a World Natural Heritage Area. Instead, the monitoring report reflects a 'business as usual' approach underpinned by grand-parenting of current use instead of careful analysis of the appropriateness of that use against the law and the 2018 context, to the benefit of the applicant.
- 8 EDS submits that a monitoring and effects assessment by a suitably qualified, independent expert (commissioned by DOC but paid by the concessionaire) is required to remove concerns over agency capture which the monitoring report's inadequacies have prompted.

² With the exception of a Vegetation Assessment which is not provided on the website and was undertaken by the same consultant as undertook the monitoring report for DOC.

Policy Context

9 Central government has expressed a clear position that stock should not be in New Zealand's freshwater bodies. It is likely to soon introduce new regulations to achieve that outcome and reduce agricultural runoff. Grazing licences on public conservation land, in a National Park, and World Heritage Area, adjoining waterways is directly contrary to that outcome. In contrast, termination of the grazing licence will give effect to the government's clear position on freshwater management.

Statutory Context

10 Cattle grazing and its impacts on the upper Haast Valley are inconsistent with s25 Conservation Act 1987 which states that every stewardship area "shall be" managed so that its natural resources are protected.

11 Renewal of this grazing licence would also contravene Policy 6.7.5 of the Mt Aspiring National Park Management Plan which states "*Grazing and farming is incompatible with the aim of preserving the value of national parks.*" To achieve that outcome Policy 1 is "*No new concessions for stock grazing will be permitted in the park.*" The information provided with the application provides no guidance as to the statutory basis relied upon by DOC to mandate even considering the renewal of this grazing licence.

CONCLUSION

12 EDS thanks DOC for providing the opportunity to give feedback. It:

- Opposes the renewal of the grazing concession.
- Seeks the application be declined under ss17U(2) and (3) Conservation Act 1987.
- Seeks that stock are promptly withdrawn and the fence and yards removed. Existing concessions only continue during a re-application period if the re-application is made at least 6 months before the lease expires (s17ZAA Conservation Act 1987). The current grazing lease expired on 31/2/17. There is not date on the application confirming that it was made within the required 6 month period.
- Recommends that DOC reviews all South Westland grazing leases with a view to ensuring that this use of public conservation land is consistent with all relevant conservation legislation, general policy, strategies, plans and wider government policies.



A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

[Redacted submitter information]

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: N/A

D. Statement of Support/Opposition

I (circle one) Support / Neutral / **Oppose** this Application.

E. Hearing Request

I (circle one) **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

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

General opposition to cattle grazing in the Te Wahi Pounamu UNESCO World Heritage Area and matters of public interest.

My submission is [include the reasons for your views]:

Thank you for the opportunity to submit on the renewal of the Haast River grazing lease.

I am a tour operator and holder of a guided walks concession for several sites in South Westland. Over the past two decades I have guided hundreds of discerning international visitors through the Te Wahi Pounamu UNESCO World Heritage site. Guests are simply astonished by the natural beauty and the vast wilderness feeling they experience when visiting the area. South Westland and the Haast River Valley in particular invokes this feeling, primarily due to the lack of development and human impact. Cattle grazing in the river bed is, however, often a conversation topic, with guests curious to know how this aligns with protecting a world class nature preserve.

The General Policy for National Parks in New Zealand allows for grazing in conservation areas and national parks land “only where the balance of evidence demonstrates that it is in the public interest that farming or grazing on that land should continue.”

This grazing lease is located entirely inside Te Wahi Pounamu West Coast UNESCO World Heritage site – a site recognised for its overwhelming mountainous landscape and for the largest and least modified of New Zealand’s natural ecosystems. The UNESCO website describes this area as containing the most intact representation of the ancient biota of Gondwana and ecosystems from the highest mountain tops to the sea. The Te Wahi Pounamu world heritage area is of global significance, therefore deserves the highest levels of protection.

Among its many recommendations, the recently released Havelock North Inquiry suggested adoption of six principles for managing Aotearoa New Zealand’s drinking water. These principles are:

- A high standard of care
- Protection of the system from source to tap
- The need for multiple barriers
- That change precedes contamination
- The need for personal ownership of a system
- Preventative risk management

Taken as a whole, these principles present a holistic ecosystems approach to managing drinking water. This approach can be adapted for management of natural ecosystems, one which applies preventative risk management and the highest standard of care for protected areas such as National Parks, Conservation Areas and especially globally significant world heritage areas.

UNESCO world heritage status places great prestige on a place and attracts a certain quality of discerning visitor. Many people travel the globe visiting UNESCO world heritage areas and become particularly attuned to the local management of each treasure. Often visitors to Te Wahi Pounamu are perplexed by cattle standing in the Haast River and grazing in its bed and are left pondering Aotearoa New Zealand’s ability to maintain UNESCO status.

New Zealand has a tragic record of wildlife extinctions since human arrivals. Currently there are around 3000 threatened species. The Department of Conservation, as Aotearoa New Zealand’s leading agency for conservation, needs to do everything it can to prevent further loss. Unfortunately, the monitoring report for this grazing lease appears to be quite superficial. The report also overlooks the broader social and cultural impacts of grazing cows within a UNESCO world heritage area.

The applicant’s assessment of environmental effects (AEE) is similarly inadequate and fails to recognise the effect of cattle grazing on important conservation values such as the presence and state of indigenous invertebrates, avian fauna and bats, water quality and freshwater ecosystems, and the impact of the activity on the natural landscape, all of which are in the public interest.

The applicants AEE dismisses the effects of cattle grazing on the freshwater ecosystem and on the ocean and appears to rely on “dilution as being the solution” to managing nutrient contamination of water, with no apparent evidence. With increasing acidification of the oceans globally, even small contributions must not be overlooked. While the applicant states that reliance on the continuation of the lease enables their farming business to be viable, they provide little evidence to support this.

Contrary to the applicant’s perspective, visitors are not satisfied with “because it has been historically farmed that is why it is still farmed”. Just because something is the historical norm does not mean that it is right. 150 years of farming is a short time frame for this 80 million year old ecosystem. Using historical use as a reason to continue grazing cattle in a world class natural ecosystem is not relevant, especially considering the biodiversity and biosecurity crises New Zealand currently faces.

Social attitudes have changed, there is greater awareness of indigenous biodiversity and ecosystems, and natural landscape values. There is an expectation that these values will be protected from adverse effects of farming. Cattle grazing in freshwater ecosystems and riparian habitat contributes to loss of natural values. The paradox of cattle grazing in protected areas is not lost on visitors and undermines New Zealand’s reputation for valuing its natural environment. The grazing lease for this part of the Haast River should therefore be discontinued.

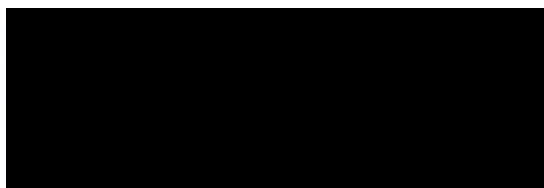
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

I request that the Department of Conservation decline the renewal of the Haast River grazing lease. It is difficult to see where the balance of evidence demonstrates that allowing grazing in the Haast River is in the public interest and that farming or grazing on this land should continue.

I recommend that the Department of Conservation embark on a review of all grazing leases located within the Te Wahi Pounamu World Heritage site and progress toward providing higher protection status to all remaining stewardship land in the Te Wahi Pounamu UNESCO world heritage area.

Thank you for the opportunity to submit.

G. Your Signature





31 May 2018
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Cowan Grazing in Haast riverbed and adjacent parts of Mt Aspiring National Park.

Dear Conservation Manager

I wish to oppose the renewal or granting of any grazing concession, lease or licence in conservation lands of the Haast river bed and Mt Aspiring National Park.

My reasons are as follows:

1. Cattle grazing is not consistent with nature conservation in the National Park.
2. The Haast River is habitat for the threatened river birds, black-fronted terns and wrybill, as well as banded –dotterel, and Caspian terns. Cattle pollute their water and pose a trampling threat to their nests.
3. Cattle pug the wet ground and make it unsuitable for walking recreation.
4. Cattle foul any water ways they have access to. In this environment there is no practical way to prevent their access to waterways.
5. Cattle are a vector for the spread of exotic plants and disturb wet ground in ways that facilitate the colonisation and spread of exotic plants.
6. Fencing that is necessary to prevent them being a road hazard restricts public movement and creates an impression that the land is private and not for the public.
7. Fencing and other grazing infra-structure detracts from the natural quality and grandeur of the scenery.
8. The impact of cattle on forest vegetation is greater than, and additional to the impact of deer.

In relation to point 8, I propose that consideration should be given to how natural flooding means that mature forest is removed and exotic grazers reduce the ability of forest to recolonise river flats. I noted that cattle grazing in the Greenstone has a significant impact on beech seedlings that sprouted in river gravels and this grazing effectively prevented beech re-establishment and facilitated a dense and dominating sward of exotic grasses sedges and rushes. Forests on alluvial plains are now vary rare and maintaining them and the ecological processes that allow their regeneration is an important nature conservation objective

On my way to Haast in February I saw a stray young cattle beast on the highway, well up the valley. There was no obvious fault in the fence there, so the fence was clearly inadequate to

hold stock. The danger of having a black beast on the highway is obvious. The lack of communication there means that communication of the hazard cannot easily be made.

I also noted a crack willow in the river bed above the confluence of the Landsborough. This is a weed that good land managers must eradicate.

It is clear to me that the economic benefit of managing the park for tourism is of greater benefit than providing marginal grazing.

I trust that you will take these conservation views into your considerations.

Yours sincerely

██████████

████████████████████

**COMMENT SUBMISSION FOR
Publicly notified application for leases,
licences, permits, or easements**

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

[REDACTED]

[REDACTED] from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** wish to be heard in support of this submission at a hearing.

F. Submission

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

The entire document

My submission is [include the reasons for your views]:

Uncontrolled grazing of natural indigenous vegetation on Conservation land is an anachronism and should have been phased out decades ago.

There is no economic justification for permitting this practice.

The supporting documentaion is scant , out of date, irrelevant and not robust. The Haast river valley is an important breeding area for a number of native birds especially wading birds such as wrybill and banded dotterel and others. The cattle are a real threat to the survival and success of the nests. The granting of a concession would breach an undertaking that the department made to discontinue grazing when the Llandsborough block was purchased by the Nature Heritage Fund. The biodiversity values of the Haast valley would be threatened by the presence of cattle there. 15 years is an excessive period for this license. The applicant is retired now and well into his 70's and there is no indication what would happen to the lease if he decides to sell or give up farming. The impact and vegetation is woeful to the point of being pathetic and lacks any detail that would be demanded for a rigorous process. There is no discussion about the terms of the lease sought. Remuneration and monitoring. There is no mechanism for keeping cattle out of the native forest beyond the lease boundary on the northern side of the valley or at the eastern end alongside the Landsborough. Granting of this lease would make a mockery of the huge and commendable effort that many responsible farmers are making to exclude their stock from waterways . It would also many ecologically conscious overseas visitors totally confused as well.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

This applicatiion should be declined. There should not be any future consideration of grazing in the Haast valley ... ever again.

[Redacted signature and name]

[Redacted address]

[Redacted contact information]

[Redacted date]

Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor



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

Notes to Submitter:

Please download and complete this form, scan and send to submissions@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor. chtaylor@doc.govt.nz

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5pm Thursday 31st May 2018.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the notified permissions application process. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act. If you wish to keep any part of your submission confidential, you need to state this in writing when making your submission. Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

[Redacted]
[Redacted]
[Redacted]
Telephone: [Redacted] [Redacted] .N2

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: [Redacted]

D. Statement of Support/Opposition

I (circle one) Support / ~~Neutral~~ / ~~Oppose~~ this Application.

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

My submission is [include the reasons for your views]:

This Area has been grazed and improved over a very long period of time. The work I have witnessed that has been completed by the Cowan family has improved the environment and only had positive effects. Family run farm with very close ties to the community.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

A continuation of the current license.

G. Your Signature

Wayne O'Keefe

Signature of submitter or person authorised to sign on behalf of submitter

Wayne O'Keefe

Printed name of submitter or person authorised to sign on behalf of submitter

31/05/2018.

Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-



Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) Support / Neutral **Oppose** this Application.

E. Hearing Request

I (circle one) **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

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

Application to continue grazing 736ha in the Haast River valley for a further 15 years.

My submission is [include the reasons for your views]:

The World Heritage Highway runs beside and through the application area which is entirely within the South West New Zealand Heritage Area. DOC has a responsibility to maintain and manage this area under the UNESCO Agreement.

Historic grazing over a 150 year period has caused ongoing damage that is visible along the Heritage Highway. Fencing erected along SH 6 which prevent cattle moving along the road also stop people being able to access the riverbed except in two places where there are DOC tracks. Public access to national parks should not be restricted by cattle grazing.

The Mt Aspiring National Park borders the entire southern edge of the application area which allows grazing inside this National Park. Damage from the grazing includes – pugging and trampling, collapse of creek banks, pollution of waterways, browsing of native plants causing habitat loss, and spread of weeds. This is totally unacceptable in World Heritage area.

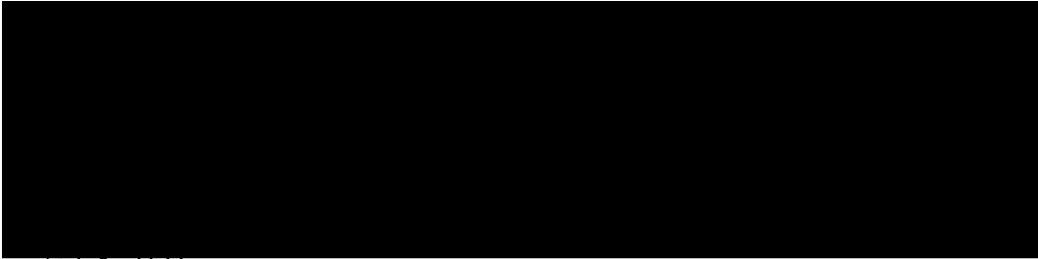
Grazing is not compatible with the preservation of the values of national parks, and contributes to ongoing loss of indigenous biodiversity.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Please decline this concession in its entirety. Grazing within national parks must stop.



G. Your Signature



31/5/18
Date _____

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Address for Service (Postal Address), _____

_____ Post Code: _____

Telephone: _____ Email Address: _____

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by: _____

D. Statement of Support/Opposition

I (circle one) ~~Support / Neutral /~~ **Oppose** this Application.

E. Hearing Request

I (circle one): **Do** / ~~Do not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

The entire application.

My submission is [include the reasons for your views]:

Please see accompanying pages.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

Unconditional rejection of entire application

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter

Printed name of submitter or person authorised to sign on behalf of submitter

Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701, Hokitika 7842, Attention: Chari Taylor

Submission to Application for Renewal of Grazing Concession 35621-GRA: Haast Valley-Area B

I unconditionally **oppose** the renewal of this concession.

Reasons:

1.) The annual field inspection of the concession area last carried out by Andrew Wells in 2015 failed to examine the forested flats on the true right of the Haast river from Prospector flat upstream, yet this is where significant river flats in the concession are located.

Furthermore, the correct procedure for monitoring grazing concessions has not been followed whereby a minimum of 3 fenced-off control plots plus another one per further 100 hectares to compare grazed with ungrazed areas, have been established.

The inspection document does not provide details of Mr Wells' qualifications relevant to the survey, so we do not know whether he is an appropriately qualified ecologist.

Since he is described as a community relations officer we can conclude that he is not an ecologist, and that the Department's priority is to ingratiate itself with the local farming community at the expense of its statutory duty to protect the natural features of this Public Conservation Land (PCL).

Furthermore, it is unclear whether the PCL on the t.r. of the Haast river in the concession area has been surveyed recently or otherwise to establish its conservation values, and what those values are.

Therefore, the inspection conclusions are invalid.

2.) The Department's (DOC)'s compliance monitoring of grazing concessions in the Haast valley is deficient, and has allowed, for example, the spraying with herbicide of indigenous vegetation on the concession downstream of the Roaring Billy (Area 'A'), and the crushing of indigenous forest on a PCL island below the Haast bridge on the true left of the river.

As stated in paragraphs 4, 5 and 6 below, DOC has also failed to monitor the ecologically harmful effects of cattle grazing and associated activities at Sunny Flat, which is within the concession area applied for.

It is very likely that DOC will continue to fail to adequately monitor grazing activity on the concession.

3.) The claim by the applicant that viewing cattle in the concession from the Haast River Safaris (HRS) jetboat operation is impossible because the tourist jetboats do not travel upstream of the Roaring Billy stream. Therefore tourists do not view Area 'B' from the river.

Irrespective of that claim, that viewing cattle in the river valley is a highlight for tourists carried by HRS is understandable concerning those from urban backgrounds, especially those from Asian countries who may well have never seen farm animals before.

However, the argument is specious because there are relatively few places in New Zealand where one can view magnificent landscapes without farming activities in the picture, which is confirmed by the applicant's claim that most postcards of landscapes feature farm animals, so one without them is especially valuable, though may not be seen as such by an urbanite.

There are thousands of opportunities in New Zealand for tourists to view farm animals in picturesque settings.

4.) The issue mentioned by the applicant, that the river flats have been grazed for 150 years is surely irrelevant because relative to the temporal natural history of the area, 150 years is a very short time period.

The applicant fails to present evidence that “grazing has a positive effect on vegetation in the Haast” and that without it, weeds would take over.

Undoubtedly, cattle have contributed to the spread of exotic weeds.

Furthermore, no clarification or context is provided as to the claim that exotic grasses are an improvement over indigenous grasses.

Understorey native vegetation at Sunny Flat is eaten out by cattle, as shown in the photograph below taken on 13/5/2018, within Mount Aspiring National Park (MANP) or very close to the boundary with it, with no fence between it and Area ‘B’.

This surely contravenes provision 11 of Schedule 3 for Area B as well as s.8.1 of the Standard Terms and Conditions for Grazing Licences because the understorey and regrowth in other nearby ungrazed parts of MANP have a prolific and biodiverse understorey.



Additionally, severe pugging was observed, as shown below, which contravenes provision 3(c) of Schedule 3 for Area B:



Neither of these photographs indicate “a positive effect on the vegetation” as claimed by the applicant.

5.) Drains have been dug at Sunny Flat to direct effluent from the cattle yards there directly into Solitude creek. Drainage works are not permitted, except through a variation, under provision 8 of Schedule 3 for Area B, for which the grazing concession expired on 31 December 2017, and for which a renewal is sought by the applicant. No such variation exists.

It is unclear whether the Department is aware of, or has monitored the effects of this discharge into Solitude creek.

A photograph of one of the drains is shown below, taken on 13/5/18.



6.) Two tarns viewed on 15/5/18 contained water too cloudy to see the bottom, while a third remained clear. Little or no aquatic vegetation was visible apart from algae in the water of the cloudy tarns.

This situation contravenes the duty of the Department to manage for conservation purposes all land held under the Conservation Act (the Act), as set out in sections 6(a) and (e) of the Act, where Conservation is defined in the Act as:

“Conservation means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations”

7.) As part of the UNESCO Waahi Pounamu/South Westland World Heritage Area, farming/grazing this public conservation land (PCL) may be contrary to the purposes of this World Heritage Area (WHA), and is recognised as a threat to the values for which this WHA was created, as shown by the following extract from Section 2 (Threats) of the Te Waahi Pounamu-South West New Zealand Conservation Outlook Assessment dated 09/2017;

“Historic grazing licences exist on conservation land on the outer edge of the property (e.g. South Westland river valleys). Freshwater systems, water quality, valley floor vegetation and forest margins are detrimentally affected by the grazing of domestic stock particularly cattle within the National Parks and conservation land contained within the property. Some of this grazing was guaranteed under NZ law when Mt Aspiring National Park was established. **Other areas (e.g. Haast Valley) have been subject to short term grazing lease renewal so there is an opportunity to terminate these leases to protect water and forest margins from further degradation (my emphasis added).** The protection of freshwater values throughout NZ has since 2014 become a

major issue within NZ because of the deterioration of water quality with a large increase in the NZ cattle population, particularly dairy cows. The Government's Nature Heritage Fund has since 1990 been negotiating through business agreements, the destocking of many of the highest profile valley systems within Mt Aspiring and Fiordland National Parks to return these areas to natural condition. The de-stocked Park areas include the Eglinton Valley, Dart Valley, Siberia-Wilkin-Makarora Valley and the Landsborough-Upper Haast Valleys. This process is ongoing and....there is some farming pressure to issue new grazing leases over some of the areas where grazing had ceased, or had been negotiated to stop (e.g. Upper Haast Valley).

(McSweeney Gerry, pers. comm. September 2017, Molloy, L. 2016, Nature Heritage Fund - Celebrating 25 years, Wellington, Department of Conservation Pages 34-38)."

Furthermore, its use for grazing is contrary to sections 6(a), (ab) and (e) of the Conservation Act 1987 (the Act) and its amendments because grazing interferes with native fauna and flora, and obstructs public use and enjoyment of the area on account of the electric fences and 2-3 Taranaki gates which the general public would find hard to open and close.

8a.) Cattle are a major source of greenhouse gas (GHG) emissions in the form of methane, so, in our era of GHG-induced climate change it is entirely inappropriate for the Department of Conservation to be supporting an industry, cattle grazing, on its land that is a major contributor to global GHG emissions. As a good global citizen, New Zealand has obligations and commitments to reduce GHG emissions, so to allow grazing on public conservation land demonstrates a grave lack of good faith in adhering to those commitments.

It must be remembered that nearly half of NZ's GHG emissions come from the agricultural sector, so everything must be done to reduce those emissions.

8b.) It is appropriate that as a government department, DOC set a good public example by enabling conservation land to be utilised to absorb GHGs. Conservation lands should be managed to maximise GHG sequestration, and in this instance, by allowing the river flats to revert to indigenous woody vegetation which will promote this function. The start of this slow process of indigenous ecosystem recovery can be seen on the nearby Landsborough Station, which was destocked about 12 years ago.

9.) It is now best practice in New Zealand to keep stock out of waterways. Cattle on this concession have unrestricted access to all waterways, and it is impossible to fence those waterways off from them. Therefore, indigenous fish habitat is not and cannot be protected as required by s.6(ab) of the Act, yet it is perfectly practicable to discontinue the concession by rejecting the application for renewal.

In addition, the Haast river is a braided river, as is evident from the satellite imagery, and therefore provides habitat for indigenous birds which use such a habitat, such as dotterels and wrybills, both of whose populations are vulnerable and in decline.

Stock can trample the riverbed and island nests of these ground-nesting birds, as well as rendering their habitats otherwise unsuitable.

10.) The applicant's claim that the cattle have "no effect on adjoining land" is untrue. I have personally witnessed fresh cattle dung in the forested terrace on the true right of the Haast river immediately upstream of the Roaring Billy stream in summer 2017/18, which is not part of Area 'B'. There can be little doubt that they would have been browsing on favoured native plant species therein. Otherwise why would they be there?

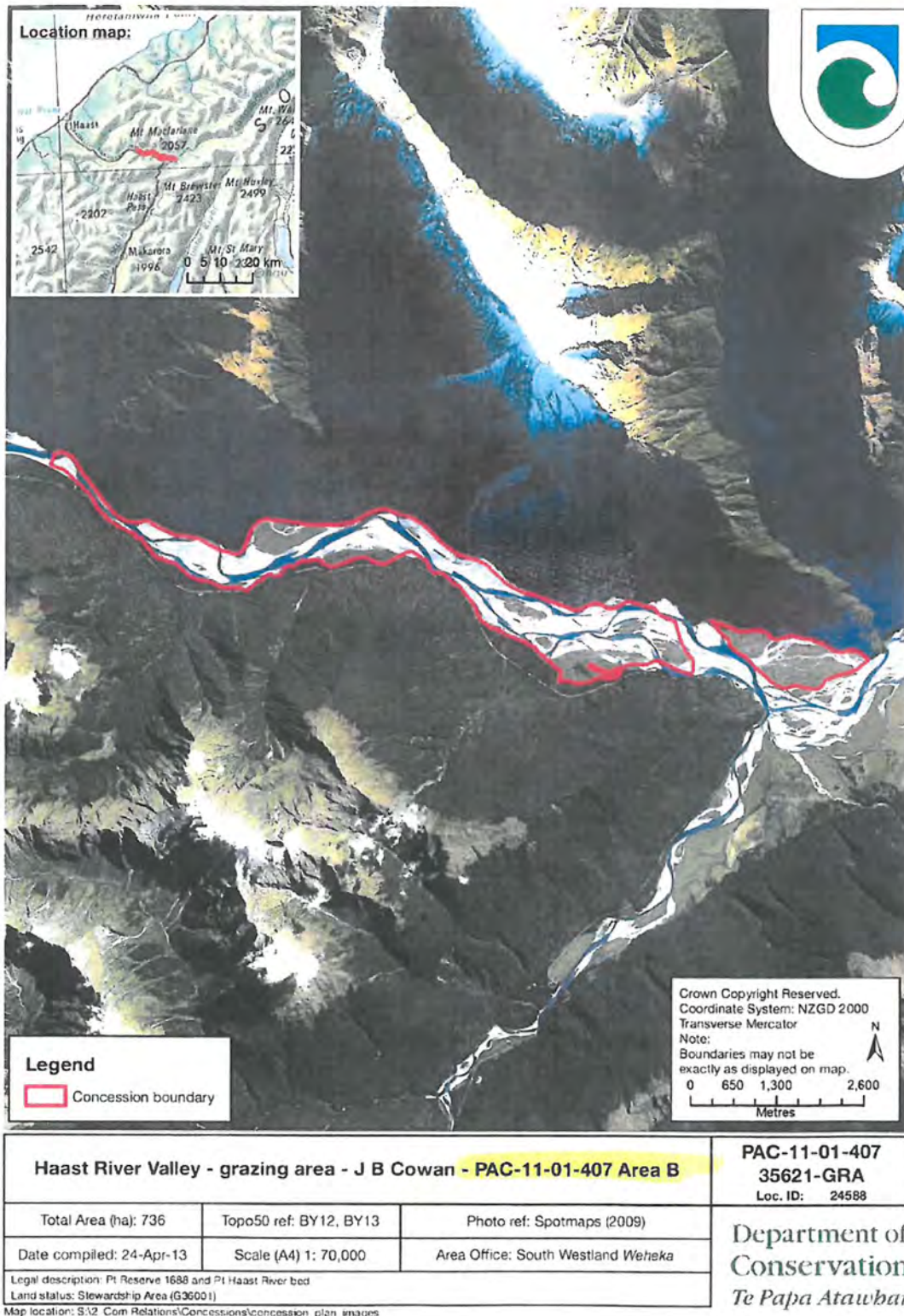
Also, cattle roam and graze in the roughly 80ha of Mount Aspiring National Park (MANP) alongside SH6 and not included in the concession, yet open for cattle to enter. Vegetation damage within these areas, which run between SH6 and the grazing concession and which I have observed, is considerable.

There can be little doubt that the intended purpose of having National Park on both sides of SH6 was to ensure that the road ran through forest undisturbed by pastoralism and other human activities, for the benefit of visitors to the area.

11.) As may be seen from the satellite imagery, and the site plan of Area 'B' shown below, a considerable area of Mount Aspiring National Park (MANP) is fenced off by the applicant for grazing on the north side of SH6 because the fence runs alongside the highway. This area is not mentioned or included in the application, so grazing within it contravenes provision 3(b) of Schedule 3 pertaining to Area B, which is the area under consideration, and amounts to grazing free of charge.

No evidence is provided in the application documents from the Department of Conservation (DOC) to show that the concession renewal under consideration includes an area of MANP and that it conforms to the provisions of the MANP Management Plan.





Haast River Valley - grazing area - J B Cowan - PAC-11-01-407 Area B			PAC-11-01-407 35621-GRA Loc. ID: 24588
Total Area (ha): 736	Topo50 ref: BY12, BY13	Photo ref: Spotmaps (2009)	Department of Conservation <i>Te Papa Atawhai</i>
Date compiled: 24-Apr-13	Scale (A4) 1: 70,000	Area Office: South Westland <i>Weheka</i>	
Legal description: Pt Reserve 1688 and Pt Haast River bed Land status: Stewardship Area (G36001) Map location: S:\2 Com Relations\Concessions\concession plan images			

12.) The reason given by the applicant in the email of 23 March 2018 (partial response to request for information) regarding the critical importance of the concession area in providing employment for 3 full-time employees on the farm lacks credibility. The applicant holds two extensive and intensively farmed freehold beef cattle farms at Snapshot creek and Haast Junction, plus the grazing concessions on the Haast river downstream of the Roaring Billy stream, plus a block of freehold grazing pasture at Cron creek, plus another concession at Haast Beach.

These are areas where the majority of the stock are grazed, and where the labour input is focused. The maximum permissible stock numbers on the concession area (60 cows/12 months and 50 calves/6 months) forms a minor part of the overall stock numbers owned by the concessionaire.

It is practically inconceivable that the loss of what is a small part of the large overall farming operation will have any impact on the employment of the three fulltime employees.

If the farming operation as a whole cannot operate as an economically viable unit without a heavy public subsidy in the form of the grazing concession in question, then it is surely not an economically viable and sustainable business in its current form.

It must be remembered that the base annual concession fee of \$2,438 incl gst plus an environmental monitoring charge of approximately \$1178 incl gst every few years (say \$400/year), to graze 110 animals works out at \$26 per beast per year, which is a peppercorn rate amounting to a public subsidy of this pastoral activity at the expense of the values which the Department has a statutory duty to protect, enhance and uphold, and is surely an undervaluation and in breach of s.17Y(2) of the Conservation Act 1987.

As previously mentioned in item 9, the associated grazing in MANP is free of charge and is therefore a further public subsidy of the operation.

These rates suggests a degree of corruption and collusion between the Department and the concessionaire which should attract the attention of the Serious Fraud Office (SFO).

In the light of all the above evidence, the application must be rejected.

End of submission.



**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

63919-GRA John B Cowan

B. Name of Proposed Activity and Location(s)

Grazing of 736 hectares within the Haast River valley, known as "Area B", between the Roaring Billy and the confluence of the Landsborough River for a period of 15 years.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Address for Service (Postal Address):

Post Code:

Telephone:

Email Address:

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

I wish to be contacted alternately by:

D. Statement of Support/Opposition

I (circle one) **Oppose** this Application.

E. Hearing Request

I (circle one): **Do wish** to be heard in support of this submission at a hearing.

F. Submission

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

The entire application - grazing in the Haast/Landsborough riverbed and Tititea/Aspiring National Park

My submission is [include the reasons for your views]:

We often drive up and down the Haast valley, and it should be a great place to enjoy Tititea/Mount Aspiring National Park and the Haast River. Its a spectacular place, with snow-capped peaks such as Mt MacFarlane, the wide, U-shaped valley, and the glacier-fed waters of the Haast River.

And yet this place is marred by the grazing of cattle both within the National Park, and on the river flats. It was not until I looked at this application that I realised that the strip of bush between SH6 and the Haast River is National Park. The electric fence which keeps the stock off the road also makes it hard to access the bush and river, especially with children. The gates make it look like a farm, not a National Park. Once you get to the river, with its blue swirling water and rock outcrops, there are cows, and cow pats. It is totally incongruous, in this almost pristine environment, for cows to be grazing.

The fundamental flaw of this application, and the reason that it cannot be granted, is because grazing of the riverbed, which is outside of the National Park, necessitates grazing of the National Park. While the formal application is to graze the riverbed, it is apparent that this cannot be done without also grazing the National Park. The riverbed is not fenced from the National Park, but rather the fence runs along SH6. The effect of granting this application is that approximately 100 Ha of National Park will continue to be degraded.

The Department may choose to grant an application to graze the riverbed (although it should not), but it cannot grant an application for a grazing license where the cows cannot be kept out of the National Park. While it is obvious why grazing cannot occur in a National Park, for completeness I refer to s4(1) of the National Parks Act:

"the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest."

and s4(2)e

"...the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features."

Grazing cattle is fundamentally opposed to these purposes. Further, it is specifically excluded under the Mt Aspiring National Park Plan:

6.7.5 Grazing and farming

Grazing and farming is incompatible with the aim of preserving the value of national parks. Policy 10.2 (a) General Policy for National Parks indicates that a management plan may make provision for grazing, only if land is already farmed or grazed, and only where it is in the public interest that this farming or grazing should continue.

...

Policies

1. *No new concessions for stock grazing will be permitted in the park.*

The current grazing of the National Park is not authorised by an existing concession, so it would be a 'new' concession. s6.7.5 also specifically refers to 'specific pasture areas'. The area in question here is not pasture, it

is bush.

The only way that this application could be granted is if the National Park was fenced off from the riverbed, so that the grazing would indeed be limited to the application area. Without that fence, the application is in effect to graze right up to SH6, including the National Park. In my submission, the application cannot be granted without a fence between the National Park and the riverbed. It is probably not possible to build and maintain this fence as there are places where the boundary is in the Haast River itself.

Notwithstanding the practical impossibility of building this fence, even if it could be done, and even though the Department may grant a licence to graze the Haast riverbed, it should not. The days of grazing riverbeds are coming to a close. No-one likes to see cows defecating in water, and I have seen cows defecating in the Haast River. This land is set aside for conservation purposes in Te Wāhipounamu/South West New Zealand World Heritage Area. This is not some low-value stewardship land. The Haast River itself clearly holds national-park values even though it is not classified as National Park. Grazing of the riverbed is an anachronism, and should stop.

The Government has made a recent significant investment in conservation in the Haast Valley by buying Landsborough station, recognising the very high values that this area holds. When this land was Purchased, the then Minister of Conservation said:

"This purchase secures public access to and full ownership of a beautiful glacial valley, which will form a magnificent addition to Mt Aspiring National Park"

"In addition to adding an important area to the National Park, this purchase will resolve once and for all an ongoing problem of cattle grazing inside the National Park and World Heritage Site, with all the associated impacts on natural grasslands"

The proposed grazing site is immediately adjacent to the former Landsborough Station and its former grazing licences. It would be remarkably inconsistent for the Department to allow grazing in the upper Haast valley, having spent \$3.2 million to protect an adjacent area with the same or very similar values.

It would cost nothing to decline this application.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

The application should be declined in its entirety.

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter

1
Printed name of submitter or person authorised to sign on behalf of submitter

30 May 2018
Date

Please complete this form and send to chtaylor@doc.govt.nz. You may also mail your submission to:
Director-General, c/o Department of Conservation, Hokitika Shared Service Centre, Private Bag 701,
Hokitika 7842, Attention: Chari Taylor