

Provided at the hearing

**IN THE MATTER OF** Proposed Plan Change 1 to the Regional Land and Water Plan (PCI)

**AND**

**IN THE MATTER OF** A hearing into the above pursuant to the Resource Management Act 1991

**DATE OF HEARING** 18-21 June 2018

**SUBMISSIONS OF SUPERSPHAG LTD TO PROPOSED PLAN CHANGE 1  
TO THE REGIONAL LAND AND WATER PLAN - SPHAGNUM MOSS  
HARVESTING (MISCELLANEOUS CHANGE N)**

**Evidence of Bruce Truman**

## **1.0 INTRODUCTION**

- 1.1 My name is Bruce Truman and I am the owner/manager of Supersphag Ltd a submitter in regard to Plan Change 1 with respect to Moss Harvesting. I have been in the moss industry on the West Coast for the approximately 26 years.
- 1.2 I am directly affected by the plan change as the wetland I undertake my harvesting activity in was scheduled through an Environment Court process.

## **2.0 SUPERSPHAG LTD**

- 2.1 The following are some brief details about my company;
  - We manage and harvest sphagnum moss on an area of land owned by the company. The intent has been to maintain, and retain, the wetland for that purpose on an ongoing basis.
  - Harvested moss is for both domestic and export sale purposes with NZ, USA, Netherlands being our main markets
  - Products include value added production of moss petal products and utilization of by-products of the main moss industry activities.
  - As well as myself, we currently employ 2 staff in our factory at Totara Flat. We also engage 2 moss pickers from other companies on site at the wetland.
  - Picking is done by hand, scrub cutter, forks into bales. Helicopter out onto trucks. After harvest, soon as possible is best, we crush using excavator sitting on mats to spread the weight. The use of mat's to spread weight results in approximately 25% of the ground pressure of the average human foot print.

## **3.0 OUR WETLAND**

- 3.1 We own the wetland within which our harvesting occurs, having brought the site in February 2011 for that purpose to enable us to have access to a sustainable supply of moss into the future. From our point of view it is important that the wetland remains.
- 3.2 Prior to our ownership the wetland had been used for moss harvesting, in my estimate, going back to the 1980's. Our use of the site was essentially a continuation of the cycle of harvesting in the wetland. Having said that we have

improved and enhanced the management of the harvesting process. We learn as much as possible from others and go from there. The more we can improve our process the better so knowledge sharing on wetlands is vital with less ground to work with. The less area available would just intensify the use of land we do have

- 3.3 We had not been aware that the status of our wetland was being changed until we received a letter from the Regional Council in September 2012 advising that the wetland was now included in Schedules of the Plan. The scheduled area on our property is, I estimate, over 80% of our land.
- 3.4 We were advised by the Council in 2012 that the intent of scheduling and rules had not been meant to relate to moss harvesting within such wetlands. We were advised that a plan change would be forthcoming to ensure that matter was resolved and harvesting remained permitted.
- 3.5 Our wetland is an induced wetland where the trees had been harvested and burning had occurred. Some more recent clearance and development had occurred over time, and other areas had dried out through lack of management. Since purchasing the site we have been progressively encouraging moss growth back in to those areas.
- 3.6 Given the induced nature of our wetland it is my experience that the natural process on my block will be for woody plants to take over, drying the block out in readiness for return to forest. It is already doing this at a fast rate, even in the time I have owned it.
- 3.7 It is my understanding that we do not have the cold climate here to prevent the woody plants and retain the wetland without intervention. My understanding is that high country wetlands, ie above the snow line for example or Northern Canada and USA, remain due to very low competing woody plants. From my research for managing our wetland my understanding is that other wetlands are managed, internationally, to ensure they remain healthy and support the animals and birds that need these areas.

#### **4.0 OUR SUBMISSION**

- 4.1 The points in our submission and further submissions remain and we have been generally supportive of maintenance of the ability to continue moss harvesting in scheduled wetlands as proposed in the Plan Change.
- 4.2 We made the submission as we had brought our wetland to protect it from development and to protect my business from loss of resource. Our intent has been to retain the wetland as areas of sphagnum moss resource have been lost over time due to development for other purposes. In my eyes I am being punished with the scheduling and associated rules, without any prior consultation, for maintaining and retaining the wetland at my own cost. This is why we support the continued ability to harvest moss on a permitted basis.
- 4.3 I do not think that I should have to pay for a consent process, including costs of ecological reports verifying or otherwise whether the site meets certain criteria, to prove acceptance of appropriately managed moss harvesting as an activity in a wetland. The benefits in maintaining and enhancing wetland values have been, and are able to be, demonstrated through managed harvesting.
- 4.4 It is my experience that wetlands of the nature of mine cannot remain without maintenance. It is my view that the sustainability of my operation, and the wetland, over time shows that the values of the wetland can be retained whilst at the same time providing a viable economical activity. Our aim is to sustainably manage the wetland and its moss resource into the future as our business relies on those values being maintained. If the moss resource, or even the wetland itself, is lost this has a serious effect on our business.
- 4.5 I do think, having read the submissions and some of the information presented to the hearing, that there is a lack of understanding as to how the harvesting of moss has changed over the years. This is in part why we were agreeable to the independent review being undertaken by Mr Buxton as many of the comments were based on old methods. I am aware that Mr Derks is also going to provide some further comment from an ecological point of view regarding the effects of older methods compared to what occurs today.

## **5.0 PERMITTED RULE**

- 5.1 Whilst our preference is that the Plan Change proceed as originally proposed by the Council we can accept an appropriately worded permitted activity rule. I do consider that this is more control than I should have to have as I paid to protect this very land in the first place. All new rules are restrictive and this all costs money however we made sure we were involved in the process to ensure the proposed conditions are appropriate for the type of harvesting operation undertaken and based on current information.
- 5.2 We were disappointed that other parties chose to leave the process after some months of time and effort on our part in having the potential effects of harvesting reviewed and discussing potential methods and wording. We considered that it was particularly useful to have an independent review of the potential effects of moss harvesting undertaken and we supported and assisted that process.
- 5.3 In summary it is our view that the proposed rule can work, although it has more controls than we had begun with, and we can generally continue to manage and maintain our wetland and the sphagnum moss resource to sustain them into the future. This is essentially a continuation of what we have been doing since we purchased the property.

## **6.0 CONCLUSION**

- 6.1 We simply want to continue with running our businesses which is essentially aimed at retaining the wetland and its sphagnum moss values on a sustainable basis. After all we have been doing this for a number of years, and the wetland had been used for the same purpose before that. We need the wetland and the moss to remain viable for the long term needs of our business.
- 6.2 We have made a significant investment in initially purchasing the land and then managing the operation on an ongoing basis to ensure the wetland and moss harvesting activity are sustainable into the future. Any change in status of our activity and the wetland creates a lot of uncertainty for us, those dependent on our business, and the bank in terms of the viability and value of the business and property.

- 6.3 The added stress of this process over a number of years, not something any business would factor in nor should they. We have tried to be proactive in being involved in this part of the process as we too are trying to retain the wetland and ensure it is sustainably managed for ongoing moss harvesting as we had been doing. We think the nature of our operation had allowed that to happen and we have been actively encouraging moss growth on dry parts of our land. The uncertainty for the future does create concerns in regard to our operation and is restraining our investment and time on our own property. I am operating in a very up and down mode, good at times and then why bother if I am not going to get the next harvest. Very stressful with so much at stake which those on the other side of this discussion would never understand.
- 6.2 We seek that the harvesting of moss be a permitted activity with only the level of control necessary to ensure that our operation maintains the values of the wetland that, in our view, we are all seeking to retain. We think our operations to date have been achieving that end without specific controls, which was generally endorsed by the independent review, and the proposed Rule 7a provides for appropriate management of the harvesting operation.

**Bruce Truman**  
**Supersphag Ltd**

**15 June 2018**