

# NGĀ KAIHAUTŪ TIKANGA TAI AO REPORT

Application to Release a New Organism without Controls,  
that is not a genetically modified organism  
under section 34 of the  
Hazardous Substances and New Organisms Act 1996

**Application Code: ERMA200599**

Application by Dung Beetle Strategy Release Group to import and release  
from containment 11 species of dung beetle for management of  
cattle and other herbivore dung.

16 November 2010

# Ngā Kaihautū Tikanga Taiao Report

## Introduction

Tēnā koutou katoa

My name is Nick Rahiri Roskruge and I am a member of Ngā Kaihautū Tikanga Taiao (Ngā Kaihautū). I am a descendant of the Atiawa ki Taranaki, Ngāti Tama-Ariki and Ngāti Ruanui tribes and I am a horticultural agronomist employed by Massey University.

1. This report represents the views of Ngā Kaihautū regarding the application by the Dung Beetle Strategy Release Group to import and release from containment 11 species of dung beetle for management of cattle and other herbivore dung (ERMA200599). I have examined the application and submissions along with pre-application consultation with Māori.
2. Ngā Kaihautū is charged with the responsibility of providing advice and assistance, from a Māori perspective, to the Environmental Risk Management Authority (ERMA New Zealand). As part of that role, Ngā Kaihautū has considered this application under section 6(d) of the Hazardous Substances and New Organisms (HSNO) Act 1996.
3. Ngā Kaihautū acknowledges the supporting documents aligned to the application. We also acknowledge that consultation with Māori appears to have been carried out in accordance with our policies. As a result of this process however, several concerns have been raised.
4. It is our view that this application does not adequately identify some of the concerns given by Māori. In reaching this view, Ngā Kaihautū has taken into account concerns raised by iwi/Māori in submissions to this application. In particular, section 6(d) refers to ‘the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, valued flora and fauna, and other taonga’.
5. Some key points to note around the application are as follows:
  - a. Much of the iwi response to the pre-application phase of this application indicated concern about ‘another’ biological agent (in this case a ‘suite’ of agents) entering the ecosystem. The concern is about the potential ability for iwi/Māori to react to the introduction due to the limited knowledge of the impacts prior to release. This is especially significant as much of the scientific experience with these species is on pastoral systems and in different climate zones, such as in Australia. Ngā Kaihautū concurs with this position.

- b. We acknowledge the statement that the release of the dung beetles will not compromise the food source for valued native bird species, eg, kiwi. The response of one of our eminent agricultural scientists around the benefits of dung beetles as soil structural engineers, rather than as dung removal specialists, raises the issue as to whether their introduction is warranted at all. This is relevant given that soil structure can be managed and worked with a range of ‘tools’ already available to farmers. Are we undervaluing the existing dung-cycles already occurring on our pastoral systems?
- c. As kaitiaki for the natural resources, Māori recognise our pastoral system as a part of the complex land uses which make up the landscape, rather than as a distinct stand-alone system. In this context, the role of biota within the system must therefore have an impact on the natural resource overall, affecting the natural balance of our ecosystems. The response by the applicant to submissions, that this introduction will only affect pastures supporting herbivores, does not recognise the Māori understanding of the complexity of our land, vegetation and biological populations, which is expressed as *ki uta ki tai* (from the mountains to the sea – and all in-between).
- d. Pastoral systems have already been highly detrimental to our natural resources with the widespread destruction of native groundcover, forest and bush, and the flow-on effects on contributing resources such as the fresh waterways, water-catchment areas, and soil systems. The introduction of dung beetles is intended to improve the economic returns on an already intensive system which is constantly creating growing pressures on our natural resources. In this context we (Māori) are very wary of giving our support, tacit or otherwise, to a further agent to intensify the systems and pressures on the natural resources, especially where the gain is primarily economic within the agricultural production sector.
- e. As a final point to note, we acknowledge that the introduction of these agents may have a positive economic effect for some Māori landowners with pastoral systems in place, and we recognise the need to be cognisant of this interest when considering this application.

## **Recommendation**

Ngā Kaihautū recommends that the Authority considers the application, taking into account the issues outlined above, and mitigation measures as appropriate.

Nick Roskrige  
on behalf of Ngā Kaihautū Tikanga Taiao