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5th October 2012

To: Canterbury Regional Council

Re: Proposed Canterbury Land & Water Regional Plan

Landcare Services Ltd makes this submission on the above Plan. Landcare Services Ltd provides specialist biosecurity services to the Canterbury Region, and is the only company providing aquatic weed control services throughout the Region.

Landcare Services Ltd would like to be heard on behalf of this submission.

If others make a similar submission, Landcare Services Ltd will consider presenting a joint case with them at a hearing

We currently operate aquatic weed control services under a region-wide discharge permit issues by ECAN. To date, there have been no environmental or compliance issues arising from operating under this consent. However, we have seen the adverse outcomes in other Regions of unrestricted (i.e. "permitted") discharges of chemicals to water for aquatic weed control. These include:

1. Poor results caused by a lack of knowledge of application technology, application rates and timing of application.
2. Damage to offsite and native vegetation.
3. Complaints from local residents about chemicals "poisoning" waterways
4. Increased spread of noxious aquatic weeds caused by slapdash eradication efforts using chemicals.
5. Illegal use of unregistered chemicals for aquatic weed control.

We are therefore concerned about Rules 5.25 and 5.27 of the Plan. These should be tightened up so that the discharge of ANY chemical to water for aquatic weed control is a restricted discretionary or discretionary activity. The discretion to be exercised by Council should include provision for dealing with biosecurity emergencies, and eradication of outbreaks of serious aquatic weed pests, such as Lagarosiphon, Egeria, Hornwort and Hydrilla.

Yours faithfully

Graeme and Raewyn Larcombe
LANDCARE SERVICES LTD

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