Attached is the submission of Te Korowai o te Tai o Marokura on the Ecan RPMP.

cheers

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We would like the opportunity to present our submission

Te Korowai o Te Tai o Marokura (Te Korowai) thanks Environment Canterbury for the opportunity to make a submission on the proposed Regional Pest Management Plan.

Summary

- Kaikoura is part of Canterbury.
- Kaikoura depends on tourism.
- Tourism in Kaikoura depends on sustaining the quality of the marine environment.
- Since the 2016 earthquake the Kaikoura marine environment is particularly vulnerable to invasion by harmful marine organisms.
- Environment Canterbury is responsible for regional leadership in biosecurity.
- The proposed Canterbury Regional Pest Management Plan makes no provision for marine biosecurity.
- We ask that the final Canterbury Regional Pest Management Plan include specific provision for:
  - Control of *Undaria pinnatifida* which is now spreading in the Kaikoura marine environment;
  - Control of *Sabella spallanzii* and *Styela clava* where they are present in the region, and exclusion of these harmful organisms from the Kaikoura marine environment.
  - Exclusion from the region of all other harmful marine organisms given “unwanted” status by the Ministry for Primary Industries.
- We ask that Environment Canterbury make provision for surveillance, public awareness, intelligence, compliance and networking to reduce marine biosecurity risks.
Context
The earthquake has wreaked havoc on our natural marine environment. This has created a huge amount of bare rock habitat ideal for settlement by invasive organisms. Reconstruction activity has introduced new risk vectors, such as barges and other vessels.

Active restoration of nature is required just as much as our community needs to be restored. As the immediate damage is repaired, a return to economic prosperity will depend on the quality of our eco-tourism and fisheries resources. A highway, working harbour, hotels, tourist shops and the like will be of little use if there are no whales, seals, fish, crayfish and the like.

Kaikoura currently has only one unwanted marine organism, Undaria pinnatifida. This is now spreading from the harbour area in South Bay.

Canterbury hosts two other unwanted marine organisms Sabella spallanzii and Styela clava which are both known to present in Lyttleton Harbour. These may be present in other locations, but the Council has commissioned no surveys for marine organisms. The only data are from NIWA port surveys conducted for the Ministry for Primary Industries.

Other harmful marine organisms already present in New Zealand include the Asian paddle crab, the Australian sea squirt Pyura doppleganera, and the droplet tunicate Eudistoma elongatum. Locations with these organisms are connected to Canterbury and to Kaikoura through pathways mediated by vessels, and by marine farming and fishing activities.

Regional Council role
The Regional Council is charged with regional leadership for biosecurity, including marine biosecurity, under the Biosecurity Act 1993 Section 12B. The Council also is specifically charged with attending to marine biosecurity by the New Zealand Coastal Policy Statement. ECan has made no specific provision to discharge these responsibilities in its proposed Regional Pest Management Plan or in any other programme or plan that we are aware of. The Council is therefore failing to discharge its legal obligations. As a minimum, the Council should have considered marine biosecurity explicitly and made clear decision to which it could be held to account.

Other regional councils have made provision for marine biosecurity. In the benefit/cost analysis for Northland benefits exceeded costs at a rate for more than 8 to 1. With a million tourists a year historically coming to Kaikoura for its marine environment, it is hard to imagine that a similar benefit ratio would be achieved for a substantial marine biosecurity programme here.

What needs to be done?
We ask that the final Canterbury Regional Pest Management Plan include specific provision for Control of Undaria pinnatifida, which is now spreading in the Kaikoura marine environment.

This would involve:
1. A delimitation survey to identify the limit of spread;
2. Regulation of vessels to require hulls to be clean of Undaria;
3. Preventing of further marine dumping of Undaria contaminated materials;
4. Control in new nodes using techniques developed in Fiordland.
Control of *Sabella spallanzii* and *Styela clava* where they are present in the region, and exclusion of these harmful organisms from the Kaikoura marine environment.

This would involve:

1. Assessment of current nodes of infection (if they have spread beyond Lyttleton);
2. Regulation of vessels entering or moving in the region to require that they are free of these pests (using the Northland Regional Council provisions as a model);
3. Regular inspection of South Bay and Kaikoura moorings for these pests.
4. Incident response.

Exclusion from the region of all other harmful marine organisms given “unwanted” status by the Ministry for Primary Industries.

This would involve:

1. Listing those organisms in the Regional Pest Management Plan;
2. Engaging in public awareness, intelligence gathering, compliance and response activities.

We ask that Environment Canterbury make provision for surveillance, public awareness, intelligence, compliance, and networking to reduce marine biosecurity risks.

**WE REQUEST TO BE HEARD IN SUPPORT OF THIS SUBMISSION**

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Gina Solomon  
Secretary  
TE KOROWAI O TE TAI O MAROKURA