From:	Environment Canterbury
To:	Mailroom Mailbox
Subject:	Proposal for the Canterbury RPMP Plan [#17]
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Please tick those that apply	• I do not wish to be heard in support of my submission

Your submission on the Proposal for the Canterbury Regional Pest Management Plan

The current delivery of pest management in Canterbury is currently failing on several fronts. a) Responsibility for pest control. (i)The proposed plan states on page 3 that "the Long Term Plan and Annual Plans developed by Environment Canterbury ensure that rates are set in a transparent and consultative manner, and enable ratepayers to identify and understand their liability for rates." This is an inaccurate statement. (ii) Territorial authorities should take full responsibility for all formed ie sealed and unsealed legal roads (clause 3.3.4, Table 2) as it is their land to control (iii) central government should fund wilding pine control for those areas planted as experimental plantations by government departments in the past eg Castle Hill, Craigeburn area.

b) Priorities. (i) There does not appear to be a concerted effort to control Boneseed and Broom species across Banks Peninsula. Relaxation of effort will result in the need for expensive and ratepayer-funded solutions in the future. (ii) There does not appear to be a high priority placed on mustelid and rat control across Canterbury, yet native species including ground nesting birds continue to be at risk across the region,

c) Compliance monitoring. (i) As with many Ecan activities compliance monitoring funding and staffing levels seem to be lower than required. (ii) I am aware of 3 sightings of possums in the central city near the Avon River in recent months, and have seen a possum on Glandovey road and a road-kill Wallaby west of Geraldine (on 03 June 2017). Is Canterbury's pest management/control working as well as it could?

d) Control methods authorised/used. (i) I do not favour the indiscriminate use of poisoned grain for pest control as it is non-specific and kills non-target species. A Press article (13 June 2017) highlights the unexplained deaths of gulls. It could be that farm use of poisoned grain for Canada Geese control has resulted in the death of native gulls.