

**From:** [Pest Review](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** HPRM: FW: Submission to Proposal RPMP - H Frank  
**Date:** Tuesday, 27 June 2017 1:29:09 p.m.  
**Attachments:** [Subm proposal RPMP 2017-6 final.doc](#)

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Hi, please upload to RM as a Pest management submission.

Thanks,  
Lochiel

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**From:** Hermann Frank [mailto:itod03@clear.net.nz]  
**Sent:** Monday, 19 June 2017 2:13 PM  
**To:** Pest Review <PestReview@ecan.govt.nz>  
**Subject:** Submission to Proposal RPMP - H Frank

Dear Sir/Madam

Attached find my submission to the Proposal for the Regional pest Management Programme.

Yours sincerely

H Frank

**Hermann Frank**  
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**New Zealand**

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To the  
Regional Council  
Environment Canterbury  
PO Box 345,  
Christchurch 8140

19 June 2017

RE: Regional Pest Management Plan review – proposal

**Submission**

Dear Sir/Madam

Thank you for the opportunity to comment on the proposal for Regional Pest Management Plan. I would like to make a few general comments before I write to particular points in the proposal.

**A. General comments**

1. I have attended a number of the consultation meetings for the RPMP. Also, I have spent hundreds of hours on weed control over the last 6 years and have recently started to do predator trapping.
2. In my own work I have experienced the impact of weeds and pests on biodiversity values and have seen how difficult it is to deal with problem weeds once they are established. Management of pests is much wider than just those which affect the productive and financial returns of individual landowners. The whole environment is affected and there are consequences for all of us including landowners.
3. Most attendees at the meetings asked for better control of invasive weed and pest species and for stricter enforcement of the rules
4. The current RPMS has had some effects on weed control, but the results have not been satisfactory.
5. Considering the above factors, I would have hoped that the new Plan would have some more stringent measures, but this seems not to be the case. For example, the Good Neighbour Rule is still only 10 m and the size of gorse and broom patches is still 50 m<sup>2</sup>. This is a 7m x 7m square, about the size of an average living room. Once the landowner has left it go beyond that size, there is no chance to enforce control. Since the current RPMS had been adopted, new technologies have been more in use, especially aerial spraying (which is often used to the detriment of the environment). Most landowners would use this method to control weeds.
6. There are some weeds which have not been given enough attention in the current RPMS, but it has become apparent over the last 10 years that they can have big impacts on

- biodiversity values, once they are established. However, they have not been ‘upgraded’ in the proposal. One of those weeds is sycamore.
7. Sycamores (*Acer pseudoplatanus*) become more and more of a problem in regard to biodiversity and might become a problem in farming or forestry, too. This can be seen in many places, also outside our region like in Dunedin. They outcompete native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems, bare land. Over time they form a dense monotone structure. They also spread easily by their wind-borne seeds. They are very difficult to control when they are at the stage of trees. They would need to be included in ‘sustained control programmes’ and also in ‘site-led programmes’.
  8. The Plan covers a long period of time, so a review period of 10 years is supported. Also, if particular problems arise during that period, there should be the possibility to address those.
  9. In the past, in many situations, ECan seem to only respond when they receive reports made to them, from the general public or environmental organisations. They should be much more pro-active with regards to the monitoring of both animal and plant pest species.
  10. Also, I would briefly comment on the format of the Plan. I found it very difficult to work through it as there is so much detail on some of the pages. It makes it hard to find the relevant information. The photos and detailed data and methods of controlling for particular species is welcome, but I would suggest to put this in an appendix.
  11. It is positive to have the regulatory framework laid out under points 2 and 3. Especially important in my eyes are the requirements of the RMA under 2.2.3 and the responsibilities of the various agencies, especially 3.3.2 for the Crown (which I understand is new), also for Kiwirail under 3.3.5

## **B. Specific comments**

1. 4.1. is supported with the exception that sycamore needs to be added, preferably under ‘Sustained Control’ or ‘Progressive Containment’, in addition to that also ‘Site-led’. The species is only listed as ‘OoI’ in the proposal.  
Also, Wild Russell lupin *Lupinus polyphyllus* should be included in this category. Again, it is only listed as ‘OoI’, which is not sufficient for this weed species.
2. 4.2 and the listing of those species as possible pests is supported. As indicated, they need to be included as they can cause problems in places and might cause bigger problems in the future. Also, it is a way to educate the public. However, the wording ‘organisms of interest’ seems a bit weak. I would suggest to call them “Pest organisms of interest” or similar. The old Plan seems to have useful wording, too.
3. Other weed species need to be included in this list, namely:  
Stonecrop (*Sedum acre*): This invasive pest plant can tolerate very extreme conditions, but does not like competition by taller vegetation. This means it mostly occupies areas with dry, stony or rocky conditions. However, these places are often habitat for rare plant communities with threatened plants e.g. limestone habitats, rocky outcrops, coastal and shingle sites. As the stonecrop can form very large dense mats, it outcompetes those vulnerable plants. The species needs to be included in ‘site-led’ programmes.
4. Sections 5.1 – 5.5 are all supported, especially the GNR for Crown properties in 5.4. Under ‘The pests subject to GNR’s include Bennett’s wallaby, feral rabbit, broom, gorse, old man’s beard, and nassella tussock’, sycamores need to be included as well (see above).
5. Section 6.1 – 6.3 are all supported and the detailed description of the pests etc. is positive, but as mentioned above, they might be better placed in an appendix.
6. The ‘Sustained Control Programme’ should include sycamores as outlined above. The GNR should apply and landowners shall eliminate infestations on their land within 100 metres of an adjoining property boundary and eliminate infestations that cover up

to 500 square metres in area on the land that they occupy. Rationale behind this that sycamore seeds spread easily by wind dispersion.

7. Under Plan Objective 5 for bell heather the wording 'not increase' should be replaced by 'decrease'.
8. The measures for Bennett's wallaby are strongly supported. However, I oppose the condition under Plan rule 6.4.2 'where the occupier of adjacent land is taken reasonable steps to manage wallabies on their land'. Plan rule 6.4.1 should apply to all land in the Containment Area.
9. Also, it would be more effective and guarantee better outcomes, if the control programme would be coordinated by the Regional Council and paid out of a mixture of general and targeted rate. The current RPMS has not achieved to control the spread of this highly mobile species.
10. Table 18 and Plan Objective 8 for broom is supported. The main impact of broom is described correctly, it also has a negative impact on wetlands, rocky outcrops and other specialised habitats for animals e.g. lizards.  
The same applies for gorse Table 24, so impacts on biodiversity needs to be added for these pests.
11. Objective 8 needs some alterations to the GNR and control of smaller infestations. As outlined earlier, the current Strategy had only limited success and stronger measures are needed. I suggest that the GNR for Plan Rule 6.4.5 and Plan Rule 6.4.7 the proposed distance is altered from 10m (the same as in the old plan) to a strip of 50m width.
12. In Plan Rule 6.4.6 the area currently proposed is 50 sqm as in the old Strategy. As above, this had only limited success and often small infestations had grown bigger than this size as this is just about 7m x 7m and no enforcement was possible any more. It is suggested that size of the area in the Plan Rule 6.4.6 is increased to 1000sqm. This is still only an infestation area of 25m x 20m, so still manageable.
13. Stricter control and enforcement are necessary. The same applies to Table 24 gorse.
14. For gorse, Plan Rule 6.4.13 and Plan Rule 6.4.14 the width needs to be change to 50m and 1000sqm respective (as for broom under the same rationale).
15. Also, broom and gorse, as well as long property boundaries, is a problem along rivers and their small streams, as they can spread along the waterways, especially much further downstream. Not much consideration has been given to this.
16. The Plan might consider, if it is possible, to, upon application, to wave the compliance for gorse and broom where they are being established for the defined purpose as a nursery vegetation for native revegetation.
17. Table 26 and Plan Objective 16 for Old Man's Beard are supported, but in Plan Rule 6.4.18 the size needs to be changed from 100sqm to 500sqm and also Plan Rule 6.4.19 is covered by Plan Rule 6.4.20. The width to the boundary in Plan Rule 6.4.20 needs to be changed from 20m to 50m. If Plan Rule 6.4.19 should remain (for what reason?), the distance should be changed accordingly.

I would like to speak to my submission, if this is possible somewhere in South Canterbury.

Yours sincerely