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Submitter ID:

File No:

Submission on Proposal for the Canterbury Regional Pest Management Plan 2017-2037

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Return your signed submission by 5:00pm, Monday 3 July 2017:

By Post:
Freepost 1201
Proposal for the Canterbury Regional Pest Management Plan
P O Box 345
Christchurch 8140

Or by email:
pestreview@ecan.govt.nz

Full Name: <u>Marlborough District Council</u>	Phone (Hm): _____
Organisation*: _____ <small>* the organisation that this submission is made on behalf of (where applicable)</small>	Phone (Wk): <u>03 520 7503</u>
Postal Address: <u>P.O Box 443 Blenheim 7201</u>	Phone (Cell): <u>021869808</u>
_____	Postcode: _____
Email: _____	Fax: _____
Contact name and postal address for service of person making submission (if different from above): <u>Jono Underwood</u>	

Signature: _____	Date: <u>28/6/2017</u>
<small>(Signature of person making submission or person authorised to sign on behalf of person making the submission – Please note a signature is <u>not</u> required if the submission is made by electronic means).</small>	

<input checked="" type="checkbox"/>	I <u>do not</u> wish to be heard in support of my submission; or
<input type="checkbox"/>	I <u>do</u> wish to be heard in support of my submission; and if so,
<input type="checkbox"/>	I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

(1) The specific provisions of the Proposal that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific parts/provisions of the Proposal, or wish to have them amended, and the reasons for your views)</i>		(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each part/provision. The more specific you are the easier it will be for the Council to understand your concerns)</i>
Part & Page Number	Sub-part/ Provision	Oppose/support (in part or full)	Reasons	
		See attached		

Add further pages as required

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**MARLBOROUGH
DISTRICT COUNCIL**

20 June 2017

Record No: 17110480
File Ref: E315-000-002
Ask For: Jonathan
Underwood

Environment Canterbury
P.O Box 345
Christchurch 8140

Dear Pest Review Team

Submission - Proposal for the Canterbury Regional Pest Management Plan

Marlborough Region Council (MDC) is a unitary authority (both district and regional council functions) adjoining the Canterbury region to the north, on the east coast of the South Island. MDC thanks Environment Canterbury for the opportunity to submit on the Proposal for the Canterbury Regional Pest Management Plan.

There is a long history of a close working relationship between biosecurity teams of Canterbury and Marlborough, in recognition of many shared pest management issues affected both communities. MDC wishes to continue this working relationship, irrespective of the outcome of the Regional Pest Management Plan process.

MDC endorses the approach taken in preparing the Proposal for the Canterbury Regional Pest Management Plan. The enclosed document outlines some more specific points MDC wishes to submit upon.

Yours sincerely

**JONATHAN UNDERWOOD
BIOSECURITY CO-ORDINATOR**

ENCL.

SUPPLIED VIA EMAIL

Submission - Proposal for the Canterbury Regional Pest Management Plan

(1) The specific provisions of the Proposal that my submission relates to are:		(2) My submission is that:		(3) I seek the following decisions from Environment Canterbury:
Part & Page Number	Sub-part/Provision	Oppose/support (in part or full)	Reasons	
6.1, Pg 21	Exclusion Programme Kangaroo Grass	Support in part	MDC supports the proposed programme for Kangaroo Grass. This organism is under management in the Marlborough Region.	Accept the proposed Programmes for Kangaroo Grass.
6.1, Pg 21	Exclusion Programme Woolley Nightshade	Support in part	MDC supports the proposed programme for Woolley nightshade. This organism is being considered for management in the Marlborough Region.	Accept the proposed Programmes for Woolley Nightshade.
6.2, Pg 26	Eradication Programme Moth Plant	Support in part	MDC supports the proposed programmes for Moth Plant. Moth plant in the Marlborough has been managed for a number of years and is under sustained control.	Accept the proposed Programme for Moth Plant.
6.2, Pg 26	Eradication Programme Rooks	Support in part	MDC supports the proposed programmes for Rooks. Rooks have been managed in Marlborough and are now believed to be eradicated (no active rookeries).	Accept the proposed Programme for Rooks.
6.3	Progressive Containment Programme Wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch	Support in part	<p>MDC supports the concept behind the programme as articulated in the Proposal.</p> <p>However, the proposed programme wording and structure is difficult to follow and does not make it clear to the reader how the programme will be implemented. It is acknowledged that some of this detail may be outlined in an Operational Plan.</p> <p>For example, there is an objective to clear 900,000ha of land of wilding conifers. Whilst a reference is made to the National Wilding Conifer Control Programme under Principle Measures, the way the Proposal is currently drafted; it gives the impression that the national programme gives effect</p>	Review the structure and way the wilding conifer programme is drafted and structured to clearly articulate the relationship between the Environment Canterbury RPMP programme and the National Wilding Conifer Control Programme, including costs.

			<p>to the RPMP programme.</p> <p>There is also no clear link regarding costs/cost allocation detailed in the economic analysis and how these may/may not be related to the National Programme.</p>	
6.4, Table 2a, Pg 46-47.	<p>Sustained Control Programme</p> <p>Chilean Needle Grass</p>	Support in part	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG).</p> <p>However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>a) The management of the pest plant.</p> <p>While Service Delivery is mentioned as a Principle Measure, the programme reads that occupiers are responsible for carrying out control work. MDC has a long history of managing CNG. For the last 20+ years, the bulk of control work has been driven via occupier obligations. From experience, for a number of reasons that can be elaborated upon, this has not resulted in effective management.</p> <p>b) Rule 6.4.8 seems to place a very 'light' obligation on occupiers and the CNG Management Agreement definition contains no mention of organism management activities.</p> <p>MDC wishes to express concern over a seemingly light approach to management on the pest plant and more reliance on occupier management. This is where historical programmes have come from in the Marlborough Region with not ideal outcomes. MDC is now becoming more actively involved in the management of the pest in recognition of more agency involvement being needed to effectively</p>	<ol style="list-style-type: none"> 1. Review the structure of the programme and determine whether the likelihood Principles Measures and Rules will achieve the stated Objective. This should require an assessment of programme costs and cost allocation and MDC wishes to endorse the application of suitable resources into the CNG programme to effectively meet programme objectives. 2. Set either a higher degree of obligation on occupiers or move toward more involvement of Environment Canterbury in the management of the pest, and articulate that. 3. Test the legality (robustness) of Rule 6.4.8 with respect to placing an obligation on occupiers to be party to an agreement. 4. Broaden the approach taken to spread risk mitigation to greater than just occupiers with CNG on their properties. Explore the use of specific Rules regulating high risk activities at large. 5. Related to the decisions sought above, MDC wishes to see greater clarity over what programme components will see no increase in population levels as being sought within the programme objective.

			<p>achieve outcomes.</p> <p>c) MDC assumes that legal advice has been sought over the placement on an obligation to be party to an agreement within Rule 6.4.8, as it is not clear whether this Rule requirement meets any of the rule purposes permitted under Section 73(5) of the Act.</p> <p>d) While MDC support the approach taken to address spread risk vectors and pathways, there is a limitation of Rule 6.4.8 in that an obligation is only placed upon occupiers with CNG present on their property. MDC expresses concern over the narrow scope of influence of such a Rule in that it does not place obligation or persons at large to carry an obligation to conduct activities in a certain manner.</p> <p>As a general comment, MDC notes the use of the terms 'spread' within the programme description. This inherently relates to where the plant is found, spatially. However, spread of the plant makes up but one half of the programme objective in that part (i) targets no increase in population levels. No other parts of the programme description highlight how the programme with prevent an increase in population levels.</p>	
6.4, Table 23	Sustained Control Programme Feral Rabbits		<p>MDC supports the proposal to include a RPMP programme for Feral Rabbits</p> <p>The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.</p>	Accept the proposed Programme for Feral Rabbits.

Submission - Proposal for the Canterbury Regional Pest Management Plan

6.4, Table 25	Sustained Control Programme Nassella tussock		MDC supports the proposal to include a RPMP programme for Nassella tussock. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	Accept the proposed Programme for Nassella tussock.
6.4, Table 28	Sustained Control Programme Saffron Thistle		MDC supports the proposal to include a RPMP programme for Saffron Thistle. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	Accept the proposed Programme for Saffron Thistle.
General	Marine Biosecurity	N/A	<p>There is an absence of any commentary, or potential programmes, that give affect to the Environment Canterbury's role in fulfilling its responsibility outlined within the Pest Management National Plan of Action¹ for marine pests.</p> <p>Marine pests such as <i>Sabella spallanzanii</i> and <i>Styela clava</i> are known to be established in the waters of Lyttleton Harbour. There has been decisions made, by the Ministry for Primary Industries (formerly MAF Biosecurity NZ) that eradication of these species will not be attempted nationally. As such, as outlined in the Pest Management National Plan of Action, the regional council is to take a lead role in coordinated decision making. It is not clear either within this Proposal, nor elsewhere, how Environment Canterbury intends to deliver this lead intervention and decision-maker role.</p> <p>There are links between the Canterbury and Marlborough marine environments primarily via both</p>	<p>MDC would like to see Environment Canterbury, at minimum, to reflect its position with respect to fulfilling its role(s) within the Pest Management National Plan of Action.</p> <p>In recognition of the risks of the established marine pests within Canterbury, and the known links to Marlborough, MDC would like to see a degree of operational implementation for marine biosecurity occur within in the Canterbury region. This could be documented within the RPMP, but could also be explained outside of this regulatory tool.</p>

¹ <http://www.mpi.govt.nz/document-vault/7087>

			<p>the recreational vessel traffic and aquaculture industry. These pathways could mean the action or inaction of either MDC or Environment Canterbury can have flow-on effects on the decisions that are made in either region. There are some perceived uncertainties about the roles for pathway management (and implementation of those roles) of between central government and regional government outlined within the Pest Management National Plan of Action. This uncertainty should not preclude implementation of <u>all</u> the roles when the majority or regional councils around the country seem to have taken a much clearer view on the Pest Management National Plan of Action.</p>	
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