

**From:** Environment Canterbury  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposal for the Canterbury RPMP Plan [#38]  
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Please tick those that apply	<input type="checkbox"/> I do not wish to be heard in support of my submission

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**APICULTURE**  
NEW ZEALAND

# SUBMISSION

**TO:** Environment Canterbury  
**FROM:** Apiculture New Zealand  
**SUBMISSION ON:** Proposal for the Canterbury Regional Pest Management Plan 2017-2037  
**DATE:** 3 July 2017

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## **SUBMISSION TO ENVIRONMENT CANTERBURY ON PROPOSAL FOR THE CANTERBURY REGIONAL PEST MANAGEMENT PLAN 2017-2037**

### **1. INTRODUCTION**

- 1.1. Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission to Environment Canterbury (ECan) on the proposed Canterbury Regional Pest Management Plan 2017-2037 (RPMP).
- 1.2. ApiNZ is interested in the proposed rules around gorse and broom in the RPMP. Gorse and broom are key pollen bearing plants for bees in Canterbury and are concerned about the removal of these key plants.
- 1.3. We understand that the intent of gorse and broom in the RPMP is to stop these plants re-infesting areas of Canterbury that are clear or have been cleared of gorse and broom, rather than enabling the further removal of these key pollen bearing plants in Canterbury.
- 1.4. ApiNZ wishes ECan to note the key benefits of gorse and broom for bees are as a pollen source and have concerns about spray management practices on these plants.
- 1.5. ApiNZ notes the gorse hedge and boundary requirements for gorse and broom and the area size restrictions that are in place.
- 1.6. ApiNZ supports the retention of gorse and broom in the RPMP.

### **2. CONTROL OF GORSE AND BROOM**

- 2.1. ApiNZ wishes to note that broom, gorse and willow are key pollen bearing plants for bees in Canterbury. Willow in particular has some of the highest protein available for healthy bee development. While recognising that broom and gorse are problematic in some areas and restricting spread is a key part of the RPMP, we need to strike a fine balance between the necessity to spray for weed control and the requirement to retain vegetation as a nutritional resource for bees. These plants fill a critical gap as sources of food for bees until such time as other seasonal sources of pollen and nectar are available to replace them.
- 2.2. Spraying of gorse and broom is the most likely method of control for gorse and broom. ApiNZ wishes ECan to note that spraying when gorse or broom is flowering presents a massive risk to bees. They respect no boundary and will fly up to five kilometres in good conditions to collect nectar and pollen. Please note, just because you cannot see a beehive nearby, it does not mean that bees are not present working the plants or nearby nectar or pollen sources.

2.3. Any proposed spray programme should consider the “must do” versus the “can do” for weed control. ApiNZ submits that blanket aerial spraying where bees are present should only be undertaken as a last resort. Spraying at times when gorse and broom are not flowering would be accepted provided the following key principles can be applied:

2.3.1. Targeted spraying only and at times when bee traffic is at its lowest during the early morning and/or early evening; and

2.3.2. When appropriate wind conditions prevail that ensure minimal spray drift.

### **3. CONCLUSION**

3.1. ApiNZ is the national body representing the Apiculture Industry in New Zealand.

3.2. ApiNZ notes the intent of the RPMP is to restrict the movement of existing gorse and broom populations and stop infestations on new sites; rather than an enabling rule encouraging the further removal of these key pollen bearing plants.

3.3. ApiNZ submits that any spray management programme for control of gorse and broom should be completed when the plants are not flowering and when bees are not present.

### **4. ABOUT APICULTURE NEW ZEALAND**

4.1 Apiculture New Zealand is the national body representing the apiculture industry in New Zealand. ApiNZ aims to support and deliver benefit to the New Zealand apiculture industry by creating a positive industry profile, business environment and opportunities for members. More information can be found at [www.apinz.org.nz](http://www.apinz.org.nz)

ENDS