From: Environment Canterbury
To: Mailroom Mailbox
Subject: Proposal for the Canterbury RPMP Plan [#39]
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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

Dear Sir/Madam

Thank you for the opportunity to comment on the proposal for Regional Pest Management Plan. During of over a decade of conservation volunteering in Canterbury I have experienced the impact of weeds on biodiversity and have seen how difficult it is to deal with problem weeds once they are established. The whole environment is affected and there are consequences for all of us including landowners.

The current RPMS has had some affects on weed control, but the results have not been as positive as many of us had hoped. For this to happen the new Management Plan would need 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^2. This is a 7m x 7m square, about the size of an average living room. Once the landowner has let 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.

There are some weeds that 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 (Acer pseudoplatanus). This species has become more and more of a problem in regard to biodiversity and might become a problem in farming and forestry, too. This can be seen in many places within Canterbury. They out-compete native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems and bare land. Over time they form a dense monotone structure. 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'. In the future they will be far more expensive to remove as they become more and more of an issue. This is a similar situation to the wilding pines in the Mackenzie area.

In the RPMS section 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. Wild Russell Lupin Lupinus polyphyllus could also be included in this category as it is also listed as 'OoI', which is not sufficient for this

weed species. 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 out-competes those vulnerable plants. The species needs to be included in ‘site-led’ programmes.
Thank You
Tony Doy