Meridian Energy Ltd submits that Lagarosiphon Major be upgraded from a Organism of Interest (OoI) listed on page 102 in Appendix 2 of the Draft Proposal for the Canterbury Regional Pest Management Plan 2017–2037 – to a pest in Table 3 of this consultation document, pages 14–16.

Meridian Energy considers that Lagarosiphon Major meets the current Pest Management Plan threshold for classification as a pest being:

"....capable of causing adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori, their culture, and traditions and their ancestral lands, waters, sites whahi tapu and taonga.

For consistency purposes Meridian Energy Ltd considers this approach should be adopted given that Lagarosiphon Major is listed as a pest in the Otago Regional Pest Strategy.

Meridian Energy and Land Information New Zealand (LINZ) make a significant financial commitment annually to control this organism to the Waitaki Lake System. Lagarosiphon Major is managed within Lake Benmore and Aviemore currently but there is a reasonable risk that it could become more widely spread throughout the Waitaki Lake system or inadvertently spread to other natural Canterbury lake systems. This would be a major setback for lake ecology in Canterbury.

For consistent containment strategies, coordination and public education there is a strong argument that the Regional Council should upgrade the status of this organism as requested. The focus should be on containing the organism within the current boundaries of where it has spread.

If the Council was prepared to make this change then appropriate changes would need to be made to Table 11 (progressive containment), Table 32 (monitoring objectives), Table 34 (cost/benefit analysis), Table 35 (beneficiaries and exacerbators), Table 36 (funding).

Given the significance and consequences of the spread Lagarosiphon Major in the context of the Canterbury Region it would seem reasonable that the regional community contributed to a
portion of the containment costs of this introduced pest.

Meridian is prepared to discuss the contents of this submission further with Regional Councillors or staff if considered appropriate or they want further information on the content of Meridian's and LINZ's current containment programme.

Yours faithfully

Andrew Feierabend