

**From:** Environment Canterbury  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposal for the Canterbury RPMP Plan [#47]  
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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  
Part 11 Pest management Programs. Table 3.3 containment plant pests; Broom & Gorse page 10:  
Broom page 44–45 7.5.1 – 5 and Gorse page 46–47 7.6.1–5

I am making this submission as an advisory Trustee to Rapaki Maori Reserve 875 1A2B within the Lyttelton harbour catchment.

"I oppose those parts of the plan identified above and wish to have them amended to enable greater land management options."

At present we are considering land management plan options and I would like us to be able to consider a 100 year plan including native regeneration using gorse and broom as a nursery. These parts of the pest management plan restricts the opportunity to apply many alternative land management options. It restricts land use to grazing and applies a farming concept to all land use, preventing regeneration of native forestry on land that is failing financially, culturally and environmental as a farming unit.

At Rapaki I have been involved in planting native trees on reserve land using gores and broom as a nursery, this is not a new idea, there are a number of successful examples and data that ECAN must be aware of.

I have been involved with this land since I was a child in the early 1950's when my grandfather farmed it, I have sprayed gorse that just grew right back again and again.

To day we are forced to graze cattle that cause excessive erosion, dead animals and stock effluent fill the stream bed and flush into the harbour polluting the kai moana in our bay to deadly levels many hundreds of times above the safe level for human consumption. I have personally walked ECAN staff over this land pointing out this pollution but to no avail.

Most of the land at Rapaki is very steep and past spraying of these so called weeds on the Steadfast reserve in Cass bay resulted in landslips that washed large quantity of mud and sediment into the harbour. Recent harbour research shows Rapaki bay as having one of the highest levels of sediment run off and yet today we are facing pressure from ECAN to spray these "weeds" on land recently destabilised by earthquakes.

This would force us to throw good money after bad even though we are operating at a financial loss, just to satisfy bureaucratic requirements that have no relevance to the environmental needs of this land.

"I wish to have amendments made that enable us to allow gorse and broom to grow and spread in support of alternative land use options including regeneration."

This would include internal gorse and broom spread but not boundary weed management when required by weed free neighbours."