

**From:** Environment Canterbury  
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Please tick those that apply	<ul style="list-style-type: none"><li>• I do wish to be heard in support of my submission; and if so,</li><li>• I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing</li></ul>

Your submission on the Proposal for the Canterbury Regional Pest Management Plan  
Waimakariri Ecological and Landscape Restoration Alliance (WELRA) Submission on  
The Proposed for the Canterbury Regional Pest Management Plan 2017–2037

Submission 1: Amend Progressive Containment to Eradicate – Part 2

1.1 Specific Provision

Part and Page: Part 2, pg14–15

Sub part/provision: 4.1 Organisms declared as pests, Table 3

1.2 Submission

Oppose/Support: Oppose, in part

Reason for change:

The proposed primary pest management programme for wilding conifers is progressive containment. This is based on the cost benefit analysis of the different control programmes and the timescales required to complete each programme. This submission is in part opposition to the proposed classification of wilding conifers under the progressive containment programme in Table 3.

Wilding conifers, due to their characteristics of size, seeding capabilities and ease of removal, can be eradicated from an area much more readily than other pest species. This is recognised nationally under the New Zealand Wilding Conifer Management Strategy which “aims to prevent the spread, contain or eradicate wilding conifers by 2030”. A progressive containment programme in Canterbury is unlikely to achieve the aim of the national strategy by this date. There is little point in trying to “contain” wilding conifers – particularly lodgepole/contorta which can spread more rapidly than any other conifer species, out to distances of many kilometres from the seed source. An attempt at “containment” of wilding conifers will continue, ad infinitum, to cost inordinate amounts of money to remove the wildings generated from any new, growing, seed-source.

Eradication should be the primary pest management programme for wilding conifers under the pRPMP. An eradication programme is the most cost-effective use of taxpayer and ratepayer money overtime. This is recognised by DoC who list wilding conifers as Enemy Number 1 in their War on Weeds and the allocation of \$16 million over 4 years through MPI for a national control programme.

WELRA supports ECan's commitment to removing wilding conifers and their seeding sources from the region but proposes that, by working in partnership with communities, central government agencies, and other donors, that eradication of wilding conifers is possible and should be the aim of the pRPMP.

The wilding conifer invasion has an end-point which will be achieved when all seed-source trees and their pre-coning progeny are removed. As the soil seed bank is short-lived (cf., gorse and broom), if these emerging trees are removed before coning age, then the wilding conifer issue ceases to exist.

The cost of controlling wilding conifers per hectare does not change between progressive containment and eradication programmes – the only real difference is the wildings that are targeted and volume of work required. The control costs for wilding conifers increases significantly for each year that the trees are left to grow and spread. A policy of containment in the pRPMP will not support the national strategy and will burden ratepayers with ever mounting costs for future generations.

In addition, the full environmental and social cost of wilding conifers is not considered in the cost-benefit analysis undertaken for this Proposal. One of the most significant impacts of wildings is on natural landscape values. Canterbury is home to nationally significant vistas and landscapes, most of which are under threat from wildings. While it is not possible to calculate the financial cost, the loss of these landscapes would have major economic as well as environmental and social impacts.

It is financially imperative therefore to invest funds into early eradication. Equally important is the requirement to instigate and implement a supportive legislative system that directs the removal of all wilding conifers and supports the investments made into eradication to date. Consequently, WELRA submits that the Proposal is amended so that the Primary pest management programme for wilding conifers is Eradication.

### 1.3 Proposed Amendment to Plan

Seek the following changes/decisions:

WELRA proposes to amend the pRPMP Table 3: Organisms classified as pests, as follows:

Pg15 – In Table 3, amend the Primary programme from 'Progressive Containment' to 'Eradication'

Pg15 – In Table 3, insert 'Yes' into the Good Neighbour Rule (see submission 2)

Pg15 – amend page numbers according to Eradication programme classification

If adopted, this submission will also require changes to the current wording and location of wilding conifer sections of the Proposal. Relevant sections of the Proposal effected include:

- Part and Page: Part 6, pg26–30, 6.2 Pests to be managed under eradication programme, Table 8, Table 9, and Table 10

Amend to include wilding conifer content that is currently proposed under progressive containment programme. Amend to describe collective management approach to eradication of wilding conifers between community, local and central government agencies.

- Part and Page: Part 6, pg31, 33–34, 6.3 Pests to be managed under progressive containment programme, Table 11, Table 12 and Table 13

Related to above, removal of wilding conifers from progressive containment programme.

- Part and Page: Part 6, pg35–36, 6.3 Pests to be managed under progressive containment programme, Table 13, Plan Objective 4

Amend Plan Objective 4 to reflect community driven collaborative and coordinate response to wilding conifers to achieve eradication.

- Part and Page: Part 7, pg68–69, 7.1 Measuring achievement of objectives, Table 32:

Monitoring objectives

Amend according to change in primary pest management programme.

Submission 2: Include Wilding Conifers within GNR (Rule 6.3.2)

### 2.1 Specific Provision

Part and Page: Part 5, pg20

Sub part/provision: 5.4 Rules (GNR)

## 2.2 Submission

Oppose/Support: Opposition, in part

Reason for change:

This section identifies various pests that are subject to Good Neighbour Rules (GNR). These rules are intended to support properties where pest control works have been undertaken. They require neighbouring properties to also undertake pest control work near the property boundary.

When referring to GNR, the Proposal states the pests subject to these rules include – wallaby, rabbit, broom, gorse, old mans beard and nassella tussock. The relevant rules are marked as such with a note in Part 6 of the Proposal. This submission is in part opposition because of the exclusion of wilding conifers from the list of GNR.

Rule 6.3.2 is not currently noted as a GNR but requires the neighbours of a property that have been controlled using public funds, to eradicate wildings within 200m of the property boundary. WELRA would submit that this is a GNR rule and should be identified as such, both in the reference list on pg20 and noted within Rule 6.3.2.

While WELRA understands that wilding conifers are subject to a variety of pest control programme structures and management systems, being included in the GNR system will support control works completed to date and help contain the spread.

Failure to categorise Rule 6.3.2 as a GNR; coupled with a land occupier's requirements under proposed Rule 6.3.1 and a proposed progressive containment programme; could inadvertently burden some land occupiers with ongoing financial costs if the neighbouring properties are not required to remove coning wildings. Ironically, the occupiers unfairly burdened with costs will be the properties who have already done the right thing and controlled the pest on their property.

## 2.3 Proposed Amendment to Plan

Seek the following changes/decisions:

WELRA proposes to amend the Proposal pg20 (and any other page where this list is stated in the Proposal) by the inclusion of wilding conifers in the list of pests subject to GNR:

Pg20 – The pests subject to GNR's include Bennett's wallaby, feral rabbit, broom, gorse, old man's beard, and nassella tussock and wilding conifers.

Pg15 – In Table 3, insert 'Yes' into the Good Neighbour Rule

Pg36 – addition of Note: This is designated a Good Neighbour Rule to Rule 6.3.2

## Submission 3: Amend Rule 6.3.1 on Wildings Conifers

### 3.1 Specific Provision

Part and Page: Part 6, pg35–36

Sub part/provision: 6.3 Pests to be managed under progressive containment programme, Table 13, Plan Rule 6.3.1

### 3.2 Submission

Oppose/Support: support, in part

Reason for change:

Rule 6.3.1 is intended to support control works already completed by ensuring any land occupiers maintain the controlled status of the land. If public money has been utilised, the occupier must ensure wilding conifers do not re-establish. WELRA supports in part this regulatory framework as it encourages occupiers to maintain land in a wilding free state.

However, WELRA proposes that this framework should provide support to all wilding conifer control work, whether publicly or privately funded. By removing condition (b), this rule will support and maintain all wilding conifer control work throughout Canterbury and assist with halting the spread quicker.

In addition, under a progressive containment programme, any occupier of land that has received public funded control works is liable for the ongoing costs associated with the containment of the spread. A policy of eradication will ensure these land occupiers are not burdened with control costs and responsibilities in perpetuity.

### 3.3 Proposed Amendment to Plan

Seek the following changes/decisions:

Pg36 – delete part (b) of Rule 6.3.1

#### Submission 4: Amend Rule 6.3.2 on Wildings Conifers (GNR + 5km)

##### 4.1 Specific Provision

Part and Page: Part 6, pg36

Sub part/provision: 6.3 Pests to be managed under progressive containment programme, Table 13, Plan Rule 6.3.2

##### 4.2 Submission

Oppose/Support: support in part

Reason for change:

The purpose of Rule 6.3.2 is to support control efforts already undertaken. Where control works have been completed, any neighbour to those works can be instructed to remove wildings within 200m of the property boundary. WELRA supports in part the intent behind this rule and believe it is a 'good neighbour rule' and should be classified as such in the Proposal.

However, particularly with the most invasive conifer species, contorta, this will be totally ineffective as seed source trees can be many kilometres up wind. The seed source of the infected area must be eradicated otherwise the downwind property will be obliged to undertake control works in perpetuity, particularly when considering the requirements proposed Rule 6.3.1.

The proposed 200m limit will not achieve the intent of the rule, which is to protect gains made in halting the conifer spread. As conifer seeds can travel many kilometres in strong north-west winds, the proposed distance must be increased to achieve the desired intent behind the rule.

To be effective, and to not unfairly burden some properties, WELRA proposes to amend Rule 6.3.2 to state 5km upwind or 200m in any other direction. This will allow the targeting of seed source sites that are impacting on neighbouring properties and will enable the effective containment or eradication of wilding conifers.

##### 4.3 Proposed Amendment to Plan

Seek the following changes/decisions:

Pg36 – addition of Note: This is designated a Good Neighbour Rule to Rule 6.3.2

Pg36 – WELRA propose to amend rule 6.3.2 to state 5km upwind or 200m in any other direction.

#### Submission 5: Proposed new rule (targeting major seed sources)

##### 5.1 Specific Provision

Part and Page: Part 6, pg35

Sub part/provision: 6.3 Pests to be managed under progressive containment programme, Table 13

##### 5.2 Submission

Oppose/Support: support, in part

Reason for change:

Eradication is achievable with the right mobilisation of resources and a strong supporting legal framework. WELRA supports in part the direction of the Proposal in relation to the wilding conifer threat, but believes more can be done in the framework of the Proposal to control and eradicate the spread.

WELRA proposes the addition of a new rule (proposed Rule 6.3.3) that allows for the targeting and removal of major seed source trees sites. A cluster of coning conifers on an exposed ridge can spread thousands of viable seeds many kilometres each season. These key locations have a significant impact on the rate of spread. Removing these key seed source sites is vital in any wilding conifer pest management programme and is key to reducing overall control costs. Under this proposed rule it is recommended that an Authorised Person can provide written direction to a land occupier to destroy any seed source conifers that are contributing to the spread.

This will give ECan the authority to remove major seed source sites which will reduce the rate of the spread and support the objectives of a progressive containment programme. However, by having the authority to control key seed source sites, an eradication programme is also achievable in the lifetime of the pRPMP.

##### 5.3 Proposed Amendment to Plan

Seek the following changes/decisions:

Pg36 – insert proposed Rule 6.3.3 (or equivalent wording)

Plan Rule 6.3.3

Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all coning wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy where those trees contribute to the wilding conifer spread.

Attach any supporting documents here.



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Attach any supporting documents here.



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## **RPMP 2017/37 SUBMISSION**

This is a submission on the draft Regional Pest Management Plan 2017-2037.

This submission has been developed by the Waimakariri Ecological & Landscape Restoration Alliance Inc (WELRA) and supported and approved by the WELRA management team.

WELRA is an Incorporated Society comprising a range of representatives from organisations such as Department of Conservation, Environment Canterbury, Canterbury Environmental Trust, University of Canterbury, Flock Hill Holdings and concerned citizens. We have support from businesses that are affected by the invasion of wilding conifers on their facilities such as Orion, NZTA and Transpower.

WELRA's constitutional mission is to raise funds to facilitate the removal of wilding conifers and their seed-sources from within the Upper Waimakariri River catchment.

Since its inception WELRA has raised over \$1,200,000 through LGB, MFE, DOC CCPF, WWF, ECan, Southern Trust, RATA Foundation, PCD Trust, LINZ, Solid Energy, Malvern Community Board and Flock Hill Ltd. Recently MPI have invested \$1,600,000 in the area to help accelerate the speed of wilding and seed-source removal from the infected area of the Upper Waimakariri Basin.

This submission focuses specifically on the spread of wilding conifers throughout the Canterbury region.



### **REFERENCE 5.2 - Pest management programmes**

Part 2, pg14-15, 4.1 Organisms declared as pests, Table 3  
Oppose in part

There are a number of pest management programmes outlined in this section. The wilding conifer pest control programme has been assigned to the **“Progressive Containment Programme”**.

Wilding conifers, due to their characteristics of size, seeding capabilities and ease of removal, can be eliminated from an area – 'much more readily than can some other pest species.

### **SUBMISSION - We would therefore submit that:**

**Because of this achievable, “elimination” factor, WELRA submits that the wilding conifer programme be moved from the “Progressive Containment Programme” status and positioned within the “Eradication Programme” status.**

There is little point in trying to **“Contain”** wilding conifers – particularly lodgepole/contorta which can spread more rapidly than any other conifer species, out to distances of many kilometers. An attempt at **“Containment”** of wilding conifers will continue, ad infinitum, to cost inordinate amounts of money to remove the wildings generated from any new, growing, seed-source.

### **REFERENCE: 5.4 – Rules**

Part 5, pg20, 5.4 Rules (GNR)  
Support in part

This section identifies various “rules” that will be adhered to when undertaking pest control/eradication. The significant rule identified in this section is the **“Good Neighbour Rule”** (GNR). This rule is apparently designed to prevent/deter a land occupier/owner from allowing pests to encroach onto neighbouring properties.

This section states the pests subject to the GNR directives including – wallaby, rabbit, broom. Gorse, old mans beard and nassella tussock.

While we understand that wilding conifers are subject to a variety of pest control programme structures and management systems, being included in the GNR system will prevent the current spreading phenomenon from occurring in the future.



**SUBMISSION** - We would therefore submit that:

We submit that wilding conifers be included a pest within the “Good Neighbour Rule”.

**REFERENCE: 6.3 – Pests to be managed under progressive containment programme**  
Part 6, pg36, 6.3 Pests to be managed under progressive containment programme  
Support in part

WELRA supports ECan’s commitment to removing wilding conifers and their seeding sources from the region. The wilding conifer invasion has an end-point which is achieved as soon as all the seed-source trees and their pre-coning progeny are removed. 'As the soil seed bank is short-lived (cf., gorse and broom), once these trees are removed, the wilding conifer issue ceases to exist.

The costs involved with removing wilding conifers increases significantly for each year that the trees are left to grow and spread. It is financially imperative therefore to invest funds into the early removal of seed-source trees and their pre-coning progeny to prevent the need for the expenditure of ever increasing funds in an effort to catch up with the out-of-control wilding spread problem.

To facilitate the removal of wilding conifer seed-sources and their pre-coning progeny, there is a requirement to instigate and implement a supportive legislative system that directs the removal of the “offending” seed-source, and potential seed-source, trees from all properties.

**TABLE 12: Characteristics and threats of pests in progressive containment programme**

**Wilding Conifers:**

The pest species list includes conifer species that have no commercial value. However, although a species with commercial value, Douglas fir also is a vigorous wilding-spread species responsible for many hectares of wilding invasion.

**SUBMISSION** - We would therefore submit that:

Douglas fir be added to the list of pest species when the seed escapes beyond the planted area and establishes seedlings in neighbouring property(s).





**TABLE 13: Aims and means of achievement for progressive containment programmes**

**Plan Rule 6.3.2**

There is a statement – “..... present on land they occupy within 200m of an adjoining property boundary prior to cone bearing if control operations to clear wildings .....

The “200m” distance from a neighbouring boundary, under the GNR requirements, is far too short for the most vigorous of the spreading species - lodgepole pine. In Canterbury, lodgepole pine seeds have spread up to 10km from their seeding parent trees as has happened at Craigieburn/Flock Hill Station.

**SUBMISSION - We would therefore submit that:**

**The neighbouring boundary distance for wilding conifers be expanded from “200m” to “5 km”.**

Our thanks for your considerations and deliberations of these submissions.

Ray Goldring NZSSM, JP

Chairperson WELRA