From:	nick.ledgard@xtra.co.nz
To:	Pest Review
Subject:	Pest Management plan submission
Date:	Saturday, 1 July 2017 1:49:30 PM
Attachments:	RPMSsubmissionJuly2017.docx

Dear Sir / Madam

Due to present computer problems, I am not able to fill in your supplied submission form.

Hence I have copied the format into a Word document that I can infill.

This is attached.

Regards

Nick Ledgard

RPMS submission

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Signature: Nick Ledgard Date: July 1, 2017

I wish to be heard relative to Submissions 4, 6 & 7, 8 – in table below.

Sub No	Part / page No	Sub part	Oppose / support/ amend	Reason	Seek the following
1	Whole RPMS		Support	A well thought-out and presented document. Congratulations	
2	P31 6.3		support	Support general dealing with wilding conifers as progressive containment pests.	
3	P34		comment	Corsican pine is a useful shelter species, the attributes of which (eg., low maintenance) is not replicated in other species. It is present in many improved pasture situations where its spread risk is low (eg., Glenthorne, Castle Hill and Grasmere).	Allow for its retention (and even planting) in low spread-risk situations
4	P35/36	6.3.1 / 6.3.2	comment	Douglas-fir. A high spread-risk species. I fully appreciate the problems with treating D-fir as a pest, particularly when in commercial plantations. But there are many farm situations where its removal / replacement is viable, and where notification of such to land occupiers is warranted.	Further consideration of how to deal with D-fir in farm situations, where removal and replacement with less spread-prone species is viable.
5	P 37	6.4	Support	Support gorse / broom as sustained control pest	See 6 and 7 below
6	P53	Plan Obj 14	amend	Not enough attention to prevention, 'stitch in time' control of gorse/broom in 'land presently free' of g/b A major spread mechanism for g/b seed is water in streams/rivers. Once seeds gets into these, control becomes very onerous. Hence, there is a need to detect new plants in currently g/b-free areas. This could be achieved by inspection of (eg., flights over) such areas in spring, when g/b flowering.	Greater 'stitch in time' effort in g/b-free areas to detect and remove isolated b/g plants, particularly in upper water-way catchments.
7	P70-71	7 & 7.1	amend	Gorse and broom. A major spread pathway is via movement in gravel and shingle, often from quarries, or processed shingle piles (eg., as part of road maintenance). Users of processed shingle should be able to find out whether g/b seed is likely to be present. It is common practice these days for purchasers of any product to be informed of ingredients, particularly if considered harmful. If this is not done, it defies principles stated in 5.3, 1e (P19) (e) 'pests are not to be spread (propagated, sold, distributed), and pathways are to be managed (eg, machinery, gravel, animals).'	Information on likelihood of g/b presence available to purchasers of processed shingle/gravel.
8	Not sure where	Russell lupin control	Support submission on Russell lupin control of Boffa Miskell / DOC	Determine the areas where Russell lupin should be included under the Exclusion Programme (no lupins present, and none allowed to enter the area, as well as controlling any that do appear). Where Russell lupin is present (outside of the Exclusion Programme area), one of the following two approaches should be taken:: a. Site-Led, e.g. upper Rangitata (promote rules to suit current programmes) b. Promote boundary and waterway setback rules that align with that promoted by industry	Incorporation of points raised in Boffa Miskell / DOC submission relative to Russell lupin being treated as a 'pest agent' with Exclusion Areas. Outside exclusion areas, either treat RL under a Site Led initiative or with appropriate set-back rules. Controlling the further spread of RL should definitely not be put into the 'too hard' basket