

**From:** info@ruraladvocacynetwork.nz  
**To:** [Pest Review](#)  
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**Attachments:** [Submission on Proposal for the Canterbury Regional Pest Management Plan 2017 - 2037.docx](#)

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Attached submission for the Proposal for the Canterbury Regional Pest Management Plan 2017 - 2037,

regards  
Jamie McFadden

## **Submission on Proposal for the Canterbury Regional Pest Management Plan 2017-2037**

**By: Rural Advocacy Network**

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**We wish to be heard and would consider presenting a joint submission.**

### **General submission**

1. We support the general direction of the strategy in addressing pest issues. All landowners need to be responsible managers of their land. The momentum on legacy pests particularly broom, gorse, nassella and rabbits needs to be maintained.
2. The use of boundary and internal rules is generally supported. However there are a small number of landowners that continually flout the boundary rules and we would like to see this addressed.
3. We support the Crown being bound by the strategy through the inclusion of the Good Neighbour Rules. This has been a significant anomaly for many years and has been a frustrating issue for landowners that share a boundary with Crown land.
4. There is a conflict between the CRPMP and the Land & Water Regional Plan (LWRP). On the one hand the CRPMP seeks to limit the spread of pests. On the other the LWRP stock exclusion rules exacerbate the spread of pests through the requirement for fencing of waterways and wetlands. We believe this inequity needs to be addressed in that ECans fencing requirements are aiding the spread of pests thus burdening landowners with additional costs and compliance issues. This is particularly an issue with the broom and gorse less than 50m2 rules. Related to this is that fenced waterways near main rivers such as Hurunui, Waiau, Pahau and Waitohi are being invaded by old mans beard. Mandatory stock exclusion requirements should not apply in hill, high country or extensive grazing situations. We submit that where waterway fencing is required and weed invasion likely a pragmatic approach is required. The conflict between the LWRP stock exclusion rules and the CRPMP needs to be resolved.
5. We support the work of the local pest committees. However we understand that the Hurunui Nassella Liaison Committee was not consulted over some of the proposed changes to nassella. This is not collaboration and we submit that pest committees should have an integral role in drafting policy changes.
6. Our main issue is not the strategy or rules but how the rules and inspection process are implemented. There have been significant problems and inconsistencies with

implementation over many years. Feedback from many landowners is that the pest implementation system has been the biggest cause of frustration in dealings with ECan. This has created an unnecessary extra cost burden on ratepayers and compromises the ability to achieve successful outcomes. If the CRPMP and rules as proposed prevents these implementation concerns from being addressed then we oppose the rules as drafted.

7. The funding formulae changes are inconsistent and illogical. Previously pests like rabbits, Chilean needle grass and gorse inspections were partly funded by the general ratepayer in light of the wider community benefits. However this latest plan has no general ratepayer input which raises questions about the robustness of the funding formulae rationale. We submit that all pests should have as a minimum at least 50% wider community funding for inspection costs.

### **Specific submission points**

8. **Nassella dates for completion & accompanying map.** (rule 6.4.17 & Map 5 Appendix 3). Having a small number of hill country properties as an early finish date is creating confusion amongst landowners. Feedback from landowners is that the nassella map does not accurately reflect the current situation. Our submission is that all hill & high country properties are given the same finish date being 31 October.
9. **Change of status for nassella.** We oppose the change of nassella from Progressive to Sustained control. While holding the line maybe appropriate for gorse and broom it is not for nassella. Unlike gorse and broom, nassella has fine seed that can be spread by wind some distance onto neighbouring properties. We would like to see the momentum against nassella continued. Some properties have achieved reductions of nassella over time and this should be promoted as the goal for everyone. Holding the line provides no incentive to those landowners that have a consistently poor level of control on their nassella.
10. **50m2 rule for gorse and broom.** (pages 43, 44 & 52-54) We support the intent behind this rule which is that landowners are encouraged to undertake on going control of broom and gorse within their properties. However it has been problematic for three reasons. The first is that it doesn't provide any control incentive for landowners with extensive areas of broom and gorse (over 50m2). The second is that it creates a perverse incentive for landowners to allow areas to expand over the 50m2 threshold and thus beyond the compliance regime. The third issue is that landowners with an intensive control programme on large areas of gorse and broom end up being non-compliant as the areas get smaller. This could be resolved with a more pragmatic approach to the inspection regime that takes into account the whole farm programme & extent of control work undertaken in previous years. If this cannot be done then we oppose the inclusion of this rule.
11. **Funding.** (table 36: pages 88 – 90) Our submission is that greater recognition needs to be provided in the funding rationale for the wider benefits of pest control and

historical context of pest spread. The incursion of pests into New Zealand should not be blamed on farmers but is a legacy of the development of our country.

Landowners spend considerable amounts of money on controlling pests each year and this delivers significant conservation, recreational and visual landscape benefits. Many landowners have retained extensive areas of native bush and/or shrublands and there is increasing pressure from the wider community to prevent landowners from removing indigenous vegetation. Retaining indigenous vegetation on farms exacerbates pest issues and makes pest control much more difficult. We submit the funding formulae be revised to reflect the wider community benefits. Specific comments:

- i. Gorse and broom: Table 35 on page 85 has understated the wider benefits of broom and gorse control.
  - A number of rivers e.g. upper Hurunui and Clarence are becoming choked with weeds particularly gorse and broom. This is compromising recreational access for fishing, swimming and kayaking. The spread of gorse and broom also negatively impacts on activities like biking, tramping and compromises landscape values.
  - Many broom and gorse issues have spread from public land particularly riverbeds and transport corridors.
  - The biodiversity impacts are understated. Broom and gorse are taking over some of our hill and high country low shrublands, tussocklands and shrub subalpine vegetation.
  - Broom and gorse act as nurse plants for wilding pines which out compete all native species. These weeds also provide habitat for other pests such as cats, ferrets, possums etc.
  - The Port Hills fires demonstrated the problem with allowing the spread of gorse and the wider community benefits of gorse control.

Our submission is for broom and gorse inspection to be 25% landowner 75% regional community.

- ii. Nassella: We oppose the change in inspection funding ratio from 50:50 to the proposed 25% general rate, 75% targeted rate. Left unchecked nassella can take over low growing native tussock shrubland such as *Celmesia* sp, *Linum monogynum*, *Poa colensoi*, *Pimelea prostata* etc. Nassella occurs on many lifestyle blocks and currently some of these properties have their control work funded by rates. We submit nassella inspection remain 50/50.
- iii. Chilean Needle Grass has similar biodiversity impacts as nassella and we submit the inspection funding rationale split should be the same as nassella.
- iv. Rabbits. Prior to RCD when rabbit numbers were high there was a significant impact on native vegetation. Rabbits eat regenerating seedlings and ringbark native trees and shrubs. While rabbit numbers have significantly decreased

some urban and semi-rural areas remain a concern. One of the worst areas in the Cheviot area is around the Hurunui Huts village and riverbeds. Another concern is that an increase of rabbits leads to an increase in unwanted predators such as cats, ferrets and stoats which in turn predate on native wildlife. These issues need to be reflected in the funding split and our submission is that for rabbits the inspection funding split be 50% occupiers, 50% regional community.

- 12. Inspections:** We submit that a new concept be introduced into the implementation system for pest inspections for gorse, broom and nassella. Where landowners that generally have a good track record are in minor breach they should not be issued non-compliance. Some inspectors practice this concept already. As an example where a landowner has missed a small number of nassella some inspectors identify the missed areas on a map or leave a marker on a fence post while others will issue non-compliance.
- 13. Wilding pines:** are a significant threat to landscapes & biodiversity particularly in the high country. We support increased effort on the eradication of wilding pines. There needs to be a greater emphasis on a regional & national strategic approach to the wilding issue. The transfer of land to the conservation estate through tenure review, the fencing of native bush, shrublands and waterways by landowners and the decrease in livestock grazing pressure are all aiding the spread of wilding trees.
- 14. Cats:** The release and spread of cats continues to be a concern. Farmers in the Hurunui area are regularly seeing cats and there seems to have been an increase in the number of cats being released into the countryside recently. Cats are also commonly seen in riverbeds particularly near areas where people visit. Some regional council's e.g. Greater Wellington has feral cats listed in the pest strategy and a rule that prohibits the release of cats into the wild. We support the inclusion of a similar rule into the CRPMP.

**Jamie McFadden**

**RURAL ADVOCACY NETWORK**

**30 June 2017**