



From: Environment Canterbury
To: [Mailroom Mailbox](#)
Subject: Proposal for the Canterbury RPMP Plan [#58]
Date: Monday, 3 July 2017 3:30:19 p.m.

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Please tick those that apply	<input checked="" type="checkbox"/> I do wish to be heard in support of my submission; and if so,
Attach any supporting documents here.	 lettereacan03july.pdf 92.04 KB · PDF
Attach any supporting documents here.	 finalkiwirailsubmissiontoecanproposedpestmanagementplanjune2017a.pdf 45.93 KB · PDF

03 July 2017

Environment Canterbury Regional Council
PO Box 345
Christchurch 8140

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Dear Sir/Madam

Proposed Canterbury Regional Pest Management Plan 2017-2037

Thank you for the opportunity to comment on the Proposed Pest Management Plan 2017-2037 (PPMP). I note that some of Kiwi Rail's earlier feedback has been incorporated into the PPMP.

Within the ECAN region KiwiRail has roughly 607 kilometres of railway corridor covering 2942 hectares of land comprising; the Main North Line, the Main South Lines, the Midland Line and the Hornby Branch. We maintain our corridor by; leasing it and granting licences to others, and via a national maintenance contract.

As we have previously commented rail operations face some unique challenges in respect to plant pest control. These include; budget limitations, a network which is very inaccessible for work crews and equipment, and therefore difficult to monitor regularly – and, our corridor is often used by neighbours to dump weeds and plant pests.

Please contact me if anything needs clarifying and to discuss the attached submission further.

Yours sincerely



Pam Butler, Senior RMA Advisor

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Attachment 1: KiwiRail submissions

Attachment 1: KiwiRail Feedback to the Proposed Canterbury Regional Council Pest Management Plan 2017-2037 (PPMP)

03 July 2017

Feedback Number	Theme/Chapter	Section and Topic	Page number	Comments	Outcomes Sought
1	3. Responsibilities and obligations	3.3.5 Rail	13	<p>The Plan identifies Kiwi Rail as a key stakeholder in the Plan and that the Council will work by agreement on mutual obligations and expectations. There are unusual practical challenges associated with managing pests along linear infrastructure such as the rail corridor. Manly it is difficult to access due to;</p> <ul style="list-style-type: none"> • terrain • limited access points • difficulty identifying pest plants from the track (especially low numbers and seasonal species) • the need for specialist equipment and extensive planning and staging work between operational train activities. <p>KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken while recognising specific operational and access logistics, cost constraints, and current pest management control measures.</p>	Retain Clause 3.3.5
2	8.3 Power to issue exemptions to plan rules	Section 8	73	<p>KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken within operational/financial parameters. As noted in Clause 3.3.5, KiwiRail supports discussing and agreeing an approach which recognises its unique circumstances. The PPMP should include provision for alternate management approaches (such as an agreed Management Plan) as a method of compliance with the PPMP. A mutually developed Management Plan would target efforts, over the life of the Plan, with appropriate review points. Priorities could include a focus on regionally significant ecological areas/sites and areas being adversely affected economically.</p> <p>A Management Plan approach is a useful approach to priority setting, monitoring and adaptation where management options are limited by physical and economic constraints. They provide the opportunity to adapt, update and revise implementation methods and locations over time, within an overall structure where action can be agreed, and then programmed over the term of the Plan. A Clause should be included to make reference to alternative methods of achieving PPMP Compliance including negotiated Management Plans. This has the advantage of providing both parties with greater certainty about achieving plant pest management outcomes. Management Plans can provide for a progressive control over time and add value to the control objectives. Management Plans could also include:</p> <ul style="list-style-type: none"> • contributions to biological control agent trials and release • targeted timing of pest management with agency or other projects 	<p>Alter Section 8 to make mention of alternative formal pest management responses, for example;</p> <p><i>Council may develop alternative management plans (including Management Plans with agencies to establish levels of service with those agencies, to act to control pests on their land to agreed priorities.</i></p>
3	6 Pest descriptions and programmes	Various	Various	<p>KiwiRail supports the use of Good Neighbour rules (GNRs) for all PPMP stakeholders and occupiers. PPMP provides for GNR's for plant pests broom, gorse, old man's beard, and nassella tussock. KiwiRail considers the both Good Neighbour Rules and agreed Management Plans are methods by which parties can agree to priorities for pest management based on significant pests threats. Other possibilities include:</p> <ul style="list-style-type: none"> • contributions to biological control agent trials and release • targeted timing of pest management with agency or other projects 	Retain Good Neighbour Rules