

From: Environment Canterbury
To: [Mailroom Mailbox](#)
Subject: Proposal for the Canterbury RPMP Plan [#60]
Date: Monday, 3 July 2017 4:25:26 p.m.

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Please tick those that apply

- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

Your submission on the Proposal for the Canterbury Regional Pest Management Plan

Part / Page No. : Page 53 Table 24 Gorse

Support / Oppose : I oppose the wording of the objective No. 14

Detail of Decision Required and concerns to be addressed: The objective No. 14 does not recognise the fact that seeds are already present in many cases and have been in the ground for decades and should reflect this. Also, the wording of the objective should acknowledge that Landscape, Access and Biodiversity values are also adversely affected – not just production.

Part / Page No. : Page 53 Table 24 Gorse

Support / Oppose : I oppose the concept that the landowner should bear the entire responsibility for this objective

Detail of Decision Required and concerns to be addressed: I request that consideration be given to a more equitable approach to this huge problem that exists not only due to the current owner's management of the land. Financial assistance with chemicals would be appropriate or access to ECan appointed gorse control contractors at discounted rates could be possible ways to help land owners.

Part / Page No. : Page 85 (Broom & Gorse)

Support / Oppose : I oppose the wording under the headings "Beneficiaries" and "Exacerbators"

Detail of Decision Required and concerns to be addressed: "Beneficiaries" should include the Tourism Industry and the wider Canterbury Community. "Exacerbators" should include birds, animals and the wind.

Part / Page No. : Page 89 "Funding Formulae" (Gorse)

Support / Oppose : I oppose the proposed funding formula for this objective.

Detail of Decision required and concerns to be addressed: I am of the opinion that it is grossly unfair to expect the land Occupier to be financially responsible for the entire REAL costs of this objective.

The standard, frequency and quality of "Advocacy and Advice" and "Monitoring" by ECan in my experience has been abysmal in the past and therefore of no worthwhile contribution to the problem. Funds would be better allocated to assisting Occupiers with the cost of the practical measures needed to control gorse.

It is noted in the Proposal that 100% of the cost of "Inspection" is allocated to the Occupier. However, it is not clear from the document what constitutes an inspection, by whom and at what frequency. Moreover, there is no mention of how this "Inspection" cost is recovered by the Occupier. I fundamentally oppose any proposal that the Occupier shall pay for an inspection.

GENERAL COMMENT : The continuing attitude by ECan towards landowners with respect to Gorse Control is extremely disappointing. This is a major problem for New Zealand in general and Canterbury in particular which ECan have failed to address in a proper way. Ecan continues to take the path of least resistance and target the current land owner who in most cases are not responsible for the problem. In my opinion a quantum shift in ECan's attitude is needed if there is to be any chance of gaining any ground on this issue. This needs to be a shared problem with a collaborative approach, not a draconian regime based on penalties for non-compliance.