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To: [Pest Review](#)
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Subject: Regional Pest Management Strategy - BPCT Submission
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Attachments: [image002.png](#)
[BPCT Submission Environment Canterbury 2017.pdf](#)

Please find attached a submission on the Strategy from the Banks Peninsula Conservation Trust.

Regards

Mark Christensen
Director



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UNDER THE BIOSECURITY ACT 1993

**SUBMISSION ON THE PROPOSAL FOR
THE CANTERBURY REGIONAL PEST MANAGEMENT PLAN 2017 - 2037**

Submission by: Banks Peninsula Conservation Trust

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We wish to be heard in support of this submission.

The specific provisions of the Proposal that our submission relates to are:

- a. Section 4.1 – Organisms declared as pests
- b. Section 6.2 – Pests to be managed under eradication programme
- c. Section 6.5 – Pests to be managed under site-led programmes
- d. Appendix 3 – Map 10

The Banks Peninsula Conservation Trust

The Banks Peninsula Conservation Trust (BPCT) is a highly successful, community-driven conservation organisation. Since its formation in 2001, BPCT has achieved widespread community support for our work in biodiversity protection by: working with landowners in a non-challenging and empowering way through voluntary protection methods; and forming collaborative partnerships that link the community's aspirations for biodiversity protection with local authorities and agencies with a mandate for conservation work.

In 2016 BPCT launched the 2050 Ecological Vision for Banks Peninsula (including the Port Hills). This Vision has received widespread support from the community, conservation groups, and agencies. Comprised of eight ecological goals, the final goal "Banks Peninsula is effectively free of pest animals" seeks to reduce pest animal numbers to a level which enables indigenous species to thrive and increase, and protected forest understoreys to flourish free from grazing by exotic mammals.

The Trust has a track record for effectively working with ECAN and multi-agency collaborations to achieve conservation outcomes. We wish to continue working in partnership

with ECAN to achieve the objectives of the Regional Pest Management Plan, consistent with the amendments we seek below, as they contribute to the realisation of the 2050 Ecological Vision for Banks Peninsula.

Sections 4.1 and 6.2 – Organisms declared as pests and managed for eradication

Our submission is:

Feral goats and feral deer should be added to the list of organisms declared as pests.

We seek the following decisions from Environment Canterbury:

- a. Amend Table 3: Organisms classified as pests, the following

Common name	Scientific name	Primary programme
Feral goat	<i>Capra hircus</i>	Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)
Feral deer: red (including hybrids, fallow)	<i>Cervus elaphus</i> , <i>Dama dama</i>	Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)

- b. Section 6.2. Amend Table 8 by adding:

Common name	Scientific name
Feral goat	<i>Capra hircus</i>
Feral deer: red (including hybrids, fallow)	<i>Cervus elaphus</i> , <i>Dama dama</i>

- c. Add to Table 9 beginning on page 26 a description of and discussion about feral goats and feral deer, consistent with the rest of the Table, and consistent with the comments made in this submission.
- d. In Table 10 beginning on page 29, amend Plan Objective 2 by adding after the words “... within the Canterbury Region” the words “, and within 5 years of the commencement of the Plan, eradicate feral goats within the Banks Peninsula Ecological Region as shown on Map 10 of Appendix 3.
- e. Amend Appendix 2 on page 102 by adding the words “(outside the Banks Peninsula Ecological Region identified in Map 10 of Appendix 3)” after the references to feral goats and feral deer.

The reasons for our submission are:

a. Feral Goats

Threats posed:

Feral goats, defined as those that are untagged and not kept behind a goat-proof fence, are a major threat to native and endemic plants, destroying both flora and fauna biodiversity. The goats, which thrive on the peninsula as rocky outcrops provide plenty of cover, breed year-round in the wild and often give birth to twins and sometimes triplets.

New Zealand's native plants are particularly vulnerable to damage from browsing. Herding browsers such as goats, cause two-fold damage by eating native plants and by trampling large areas of vegetation and compactable soils.

Goats will eat the foliage of most trees and plants, and quickly destroy all vegetation within their reach, eating seedlings, saplings and litter-fall off the forest floor. They have strong preferences and will eat out favoured species first such as, broadleaf/pāpāuma (*Griselinia littoralis*) and māhoe (*Melicytus ramiflorus*), before moving on to less desirable plants. Goats will also strip bark off trees and by eating young seedlings they effectively put a stop to forest regeneration.

Feral goats on Banks Peninsula are able to climb bluff systems and eat the rare and threatened plants that are endemic to Banks Peninsula such as Akaroa daisy. They also damage the integrity of forest and open up routes for lesser predators to access forest, such as possums and feral cats.

Specific impacts as an agricultural and environmental pest include:

Agricultural pest

Feral goats cause significant issues for farmers and primary producers because they:

- Compete with livestock for pasture and access to water.
- Graze perennial and annual vegetation - especially palatable species, grasses, ground covers and native vegetation.
- Browse plants used in revegetation programs and land restoration activities.
- Damage crops, fruit and associated infrastructure.
- Cause soil erosion by trampling soil and grazing intensively in selected areas - which can reduce the productive capacity of farmland.
- Promote the colonisation and spread of agricultural weeds in farmland.
- Damage fences, farm gates, and other infrastructure.
- Carry diseases of livestock, and are a human health risk.
- Present a serious risk of exotic diseases.
- Threaten food security.
- Require ongoing expenditure through control and addressing the problems they cause (eg. fence repair).
- Mix with domestic livestock (eg sheep) hindering livestock management activities.

Environmental pest

Feral goats are an environmental pest because they:

- Prevent the regrowth of plants, and can cause local extinction of palatable plant species.
- Contribute to land and habitat degradation.
- Change species composition in native vegetation, decrease seed production and change the seed bank in soil.
- Spread weeds.
- Browse plants used in revegetation programs and land restoration activities.
- Damage sensitive areas and ecosystems.
- Compete with native animals for food and shelter.
- Damage culturally significant sites.
- Damage bush tucker and water resources.
- Cause soil erosion through trampling.
- Browse and graze native vegetation which can lead to permanent changes to plant communities'.

Feral Goats are a significant threat to high-value biodiversity areas on Banks Peninsula such as Hinewai Reserve, public conservation land, and Banks Peninsula Conservation Trust and QEII National Trust covenants on private land.

The Banks Peninsula Conservation Trust has covenanted over 1100ha of private land with 62 covenants completed at a cost of over \$1M. Feral goats pose a significant threat to this investment in biodiversity protection.

Banks Peninsula has many Sites of Ecological Significance, Recommended Areas for Protection, and rare ecosystems that are yet to be covenanted or protected. The impact of feral goats are highest in these areas.

Approximately 5000 feral goats have been killed in the past decade on Banks Peninsula at a cost of ~\$300,000. Conservative estimates suggest fewer than 500 feral goats remain.

The Banks Peninsula Feral Goat Eradication Programme is implemented collaboratively by Environment Canterbury (ECan), the Department of Conservation (DOC), Christchurch City Council (CCC) and the Banks Peninsula Conservation Trust. The programme stemmed from public concern about feral goat damage to bush reserves and native plantings in the late 1980s and early 1990s, coupled with the collapse of the goat industry making them virtually worthless to farmers overnight.

The ~500 remaining animals on private land pose a significant threat to the efforts of the programme so far.

Normal fences present no barrier to feral goats, and re-infestation of previously cleaned-out areas creates significant extra work and cost.

Eradication of the few remaining animals has proved challenging and DOC advises that the Wilde Animal Control Act is not an effective mechanism to address the remaining feral goats on Banks Peninsula.

Objective:

The objective for feral goats in the RPMP should be site specific eradication of feral goats from Banks Peninsula and to declare Banks Peninsula feral goat free, ensuring that feral goats cannot re-establish in the long term.

If feral goats are not eradicated from Banks Peninsula the remaining goats could quickly re-establish to an unmanageable level. ECan has already invested ~\$300,000 on goat eradication removing 5000 goats and goat numbers are now believed to be below 500. If the remaining goats are not eradicated the investment already made is put at risk.

Once feral goats are eradicated, the Regional Pest Management Plan should be amended to include feral goats in Banks Peninsula as a pest to be managed under an exclusion programme.

Who benefits:

Banks Peninsula has become a national leader for conservation on private land with a passionate and engaged community driving biodiversity protection initiatives. The benefits of this proposal are for the whole BP community who have already worked cooperatively over a sustained period to remove feral goats from private and public land.

Additionally, farmers who do not want feral goats on their properties will benefit from full eradication (see list of threats to agriculture).

Cost:

The cost of this change within the plan would be insignificant and it would serve to protect ECan's investment of \$300,000 already made on the Feral Goat Eradication Programme. (Additional investment in the programme has also been made by Department of Conservation and BPCT).

The cost of not achieving feral goat eradication through the threat to biodiversity, on the other hand is significant and ongoing, and likely to be the failure of the program and the return of widespread feral goat pests across Banks Peninsula.

Benefit Cost Ratio:

The benefits of including eradication of feral goats on Banks Peninsula in the RPMP far outweigh the costs involved, not only to ECan but also to the wider community and the economy of Banks Peninsula. In addition to primary production, tourism is a key driver of the Banks Peninsula economy. Much of this tourism relies on eco-tourism, Banks Peninsula's largest tourist operators showcase the natural beauty and native species such as Hector's

Dolphins and the Nikau Palm Gully Scenic Reserve at the head of Akaroa Harbour, this reserve was once full of feral goats. Farmers are reliant on good neighbour rules and strong farm to farm biosecurity measures so that weeds such as gorse or diseases such as TB do not become a risk to economic viability. Conservation has also become an employer and driver in the economy of Banks Peninsula with Banks Peninsula Wool brand showcasing the conservation covenants farmers have on private land that sets them apart.

b. Feral deer

The impacts of feral deer on biodiversity are well known. For much the same reasons as apply to feral goats, there would be great public benefit in eradicating feral deer.

Section 6.5 – Pests to be managed under site-led programmes

Our submission is:

Mustelids, rats and feral cats should be added to the possum site-led Programme for Banks Peninsula if funding for that can be allocated in a fair and equitable manner. This would be consistent with the approach being adopted and considered in other parts of the country (eg Whangarei, Hawkes Bay, Auckland).

The area identified as the site-led area should be extended so that it covers all the Banks Ecological Region.

We seek the following decisions from Environment Canterbury:

- a. Amend Table 29 on page 61 by adding the words “Mustelid, Rat and Feral cats” after “Possum” and including their scientific names.
- b. Include comments in Table 30 beginning on page 62 on mustelids, rats and feral cats, consistent with the description and discussion about possums.
- c. Amend Table 31 Plan Objective 19 by including specific targets for mustelids, rats and feral cats.
- d. Amend the contents page of Appendix 3 on page 104 so that item 10 refers to Possum, Mustelid, Rat and Feral cat (site-led).
- e. Work with Banks Peninsula Conservation Trust to consider and implement a fair and equitable funding formula for the site-led programme.
- f. Amend Map 10 so that it refers to Possum, Mustelid, Rat and Feral cat.
- g. Amend Map 10 so that the site is enlarged to cover all the Banks Peninsula Ecological Region.

The reasons for our submission are:

This is consistent with, and necessary to achieve, the Banks Peninsula Ecological Vision 2050. It is also consistent with the Government's predator-free New Zealand by 2050 vision.

Adding these other pests to possums for Banks Peninsula is beneficial for all the reasons set out in Table 29, and is also supported by the reasons for the site-led programme set out in section 31 and Appendix B of the Economic Analysis report prepared by Mr Harris.

In addition to the above, the trust seeks all such other or alternative changes to the Proposed Plan that might better address the outcomes sought by the trust in making this submission.

Banks Peninsula Conservation Trust

3 July 2017

A handwritten signature in black ink, appearing to read 'M Christensen', with a stylized flourish at the end.

Mark Christensen, Chair of trustees
Banks Peninsula Conservation Trust