

From: Environment Canterbury
To: [Mailroom Mailbox](#)
Subject: Proposal for the Canterbury RPMP Plan [#62]
Date: Monday, 3 July 2017 5:00:53 p.m.

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Please tick those that apply

- I do wish to be heard in support of my submission; and if so,
- 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

Russell Lupins

The current proposal that wild russell lupins be on a schedule where they are classed as Objects of Interest (OOI) and subject to Site Management Plans is an inadequate response to a pest that is highly likely to invade high value braided riverbeds. The seeds are long lived and river-bed infestations are almost impossible to remove.

There needs to be a buffer zone requirement, via a rule, between cultivated russell lupins and waterways where the buffer distance varies based on the significant of the waterway.

Exclusion zones should be drawn up where there is no planting of russell lupins because of the significant biodiversity values at risk. e.g. nearby wrybill nesting.

Classifying russell lupins as a Pest Agent with appropriate rules that include buffer requirements and exclusion zones would more appropriately manage this plant that is a pest when established in and around waterways.

Your own document 'Analysis of Risk under NPD guidance' supports a higher level of management than currently proposed: "Some in community oppose management, overall costs are low, benefits exceed costs, impacts are known to occur, control measures are available and quality data exists"