

From: Environment Canterbury
To: [Mailroom Mailbox](#)
Subject: Proposal for the Canterbury RPMP Plan [#61]
Date: Monday, 3 July 2017 4:59:40 p.m.

Name * Andrew Simpson

Organisation The Mackenzie Basin Wilding Tree Trust
(the organisation that this submission is made on behalf of, where applicable)

Email * andrew@thecairns.co.nz

Contact phone * 021 306 229

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

Attach any supporting documents here.



[mackenzie_basin_wilding_tree_trust_submission_to_the_canterbury_pest_management_plan_final.docx](#)
35.72 KB · DOCX

Attach any supporting documents here.



[new_zealand_wilding_conifer_management_strategy_pg_29.pdf](#)
50.71 KB · PDF

The Mackenzie Basin Wilding Tree Trust supports Objective 4 in the proposed Canterbury Pest Management Plan. However, there is a concern that the wording of Rule 6.3.1 may have the effect of causing landowners to opt out of public funding because of the potential impact of the ongoing obligations it entails, thereby hindering the implementation of the eradication plan. In particular:

1. As rule 6.3.1 is currently worded, “occupiers” of land may be forced to remove all wilding conifers present on property they occupy, prior to cone bearing, even if the public funding was only received to remove or destroy wildings on a small area (“in part”) of their property. In the Trust’s view, the wording should be changed to clarify that the areas that are required to be kept clear of cone bearing wildings under this rule are those areas to which public funding has been allocated, rather than, as could be implied by the current wording, the whole property.
2. On properties where wilding spread is very dense and the trees have reached maturity, once initial clearing has been undertaken, experience has shown that there will normally be a heavy regeneration of wildings from previously scattered seed. This initial regeneration may also be quite dense and wide spread, and be beyond the financial capacity of an ‘occupier’ to undertake a second or even third clearing if the occupier is unable to manage that land to minimise this re-infestation. To address the concern of a disconnect and often contradiction between District and Regional Councils, Doc, Ecan and LINZ there needs to be consistency in rules regarding intensification of such vulnerable land.

The Mackenzie Basin Wilding Tree Trust agrees with the following statements in the “Alternatives considered”:

“Relying on occupiers to undertake voluntary control to prevent adverse impacts of pests in table 11 is not considered viable. The uneven spread of invasions places an inequitable burden on those occupiers whose property is infested.”

The Mackenzie Basin Wilding Tree Trust submits that the funding model that is contained in the New Zealand Wilding Conifer Management Strategy 2015-2030, Appendix II on Page 29, be adopted as a rule in order to give certainty to all parties (occupiers, regional and central government) regarding their respective funding obligations under this plan. This would be Rule 6.3.3

| | Preventing spread across boundaries | | Control of wildings within one privately occupied property | | Control of wildings within one Crown occupied property |
|--|---|---|--|--|--|
| Legacy plantings and legacy wildings | <p>Exacerbators:</p> <ul style="list-style-type: none"> • Neighbouring land occupiers who destock or change their land-use to reduce grazing pressure • Land occupiers/owners who have wilding conifers spreading beyond their property <p>Beneficiaries:</p> <ul style="list-style-type: none"> • Central government • Regional government • Neighbouring land occupiers/owners | <p>10%</p> <p>10%</p> <p>35%</p> <p>30%</p> <p>15%</p> | <p>Exacerbators:</p> <ul style="list-style-type: none"> • The land occupier/owner who has the wilding conifers <p>Beneficiaries:</p> <ul style="list-style-type: none"> • The land occupier/owner who has the wilding conifers • Neighbouring land occupiers / owners who are not currently affected • Central government • Regional government | <p>20%</p> <p>20%</p> <p>10%</p> <p>30%</p> <p>20%</p> | <p>Exacerbators:</p> <ul style="list-style-type: none"> • The land occupier/owner who has wilding conifers (i.e. the central government agency) <p>Beneficiaries:</p> <ul style="list-style-type: none"> • The land occupier/owner who has wilding conifers (i.e. the central government agency) • Neighbouring land occupiers/owners who are not currently affected • Central government • Regional government |
| Post-RMA plantings where specific conditions don't apply | <p>Exacerbators:</p> <ul style="list-style-type: none"> • Neighbouring land occupiers who destock or change their land-use to reduce grazing pressure • Land occupiers/owners who have wilding conifers spreading beyond their property • Local government <p>Beneficiaries:</p> <ul style="list-style-type: none"> • Central government • Regional government • Neighbouring land occupiers/owners | <p>10%</p> <p>10%</p> <p>25%</p> <p>10%</p> <p>20%</p> <p>15%</p> | | | |
| Future planting of high risk species (afforestation) | <p>Exacerbators:</p> <ul style="list-style-type: none"> • Land occupiers who plant high risk species • Neighbouring land occupiers who destock or change their land-use to reduce grazing pressure <p>Beneficiaries:</p> <ul style="list-style-type: none"> • Central government • Regional government • Neighbouring land occupiers/owners | <p>80%</p> <p>10%</p> <p>10%</p> | | | |

The Mackenzie Basin Wilding Tree Trust is of the opinion that unless funding from government is increased considerably in future budget allocations then the following statement in the “Alternatives considered” would be true.

“Eradication over the 20-year time period of the Plan is not technically possible.”

The Mackenzie Basin Wilding Tree Trust supports both Plan Objective 4 and the explanation of Rule 6.3.1, but seeks that the wording of Rule 6.3.1 be amended as follows so as to not place an unjust and excessive financial burden on ‘occupiers’: [amendments underlined]

Plan Rule 6.3.1

Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers present on the areas of the land they occupy where publicly funded clearing has occurred prior to cone bearing, if –

(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines, and larch are located on land where control operations to clear wilding conifers have been undertaken; and

(b) The control operations were publicly funded (either in full or in part).

A breach of this rule creates an offence under section 154N(19) of the Act, unless

the occupiers are unable to manage such land so as to minimise its re-infestation by wilding conifers.

The Mackenzie Basin Wilding Tree Trust supports Rule 6.3.2 and the explanation of it.,

The Mackenzie Basin Wilding Tree Trust supports the submission made by WELRA (the Waimakariri Ecological & Landscape Restoration Alliance Inc), except for their submission on Plan Rule 6.3.2 in which they submit that “The neighbouring boundary distance for wilding conifers be expanded from 200m to 5km”. We support the existing 200m distance that is already part of this rule.

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