

From: Ewan Kelsall
To: [Pest Review](#)
Subject: Federated Farmers RPMP submission
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Attachments: [Federated Farmers ECan RPMP 2017-2037 submission.pdf](#)

Please find attached the submission of Federated Farmers of New Zealand on the Canterbury Regional Pest Management Plan Review.

Federated Farmers welcomes the opportunity to comment on the future of pest management in the Canterbury region.

Regards

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Submission on the Proposal for the Canterbury Regional Pest Management Plan 2017-2037

Federated Farmers

3 July 2017



SUBMISSION TO ENVIRONMENT CANTERBURY - PROPOSED CANTERBURY REGIONAL PEST MANAGEMENT PLAN 2017-2037

TO: Environment Canterbury – the Canterbury Regional Council

SUBMISSION ON: ENVIRONMENT CANTERBURY PROPOSED CANTERBURY REGIONAL PEST
MANAGEMENT PLAN 2017-2037

DATE: 3 July 2017

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Federated Farmers would like to be heard in support of this submission.

SUBMISSION TO ENVIRONMENT CANTERBURY ON THE PROPOSED CANTERBURY REGIONAL PEST MANAGEMENT PLAN 2017-2037

1. INTRODUCTION

The North, Mid and South Canterbury Branches of Federated Farmers of New Zealand welcome the opportunity to comment on the Proposed Canterbury Regional Pest Management Plan (RPMP) 2017-2037.

Federated Farmers of New Zealand recognises the role of Environment Canterbury in coordinating the management of pests in the Canterbury region under the Biosecurity Act 1993. Canterbury farmers have a long history of working with pest management authorities on a wide range of biosecurity issues within the region. Pest management is an environmental, economic and social issue and farmers are often left to bear the cost of historic decisions that have led to modern day pest problems. Federated Farmers promotes a fair and equitable cost-sharing model for pest management which recognises both the individual and collective benefits of pest management.

Federated Farmers acknowledges any submissions made from individual members of Federated Farmers.

Federated Farmers wishes to be heard in support of its submission.

2. SUMMARY OF RECOMMENDATIONS

- Support Good Neighbour Rules that bind the Crown to the RPMP. Request the addition of wilding conifers to the Good Neighbour Rule category
- Oppose the considerable proposed increase to the landowner contribution to Biosecurity costs
- Oppose the increased inspection costs for a number of key agricultural pest species
- Oppose the removal of ragwort, nodding thistle and variegated thistle from the RPMP
- Request the inclusion of velvet leaf in the RPMP
- Request the standardisation of the control inspection deadline for nasella tussock to 31 October for all properties so that control and inspection activity can avoid lambing
- Propose Federated Farmers position on russell lupins.

3. GOOD NEIGHBOUR RULES

Federated Farmers strongly supports the proposed Good Neighbour Rules which will bind the Crown (namely Department of Conservation (DOC) and Land Information New Zealand (LINZ)) to the requirements of the proposed RPMP for wallabies, broom, rabbits, gorse, nasella tussock and old man's beard. Many farmers within the region have a boundary with Crown land and because of the nature of Crown land use and management suffer the impact of pest spread across the boundary. Federated Farmers has long questioned the exclusion of the Crown from regional pest management responsibilities as pest species do not recognise legal boundaries. For this reason, Federated Farmers

applauds the efforts of Regional Councils to bind the Crown to the collective management of these pest species.

In addition to the proposed species, Federated Farmers strongly recommends that the various wilding conifer species are added to the Good Neighbour Rule list in regards to the following boundary clearance rule; '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, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers have been undertaken on the adjoining property, within 200m of the boundary, since the commencement of the Plan.'

Given the National Wilding Conifer Management Strategy, to which Federated Farmers, DOC, LINZ and Environment Canterbury are all stakeholders, it seems illogical to not include a Good Neighbour Rule for the management of these prolific pest species.

Federated Farmers position: Strongly support the proposed Good Neighbour Rules that bind the Crown to the RPMP. Request the addition of wilding conifers to the Good Neighbour Rule category for the boundary control rule listed above.

4. PROPOSED INCREASE TO LANDOWNER CONTRIBUTIONS

Federated Farmers strongly opposes the considerable increase in landowner contributions through the targeted pest rate. It is well recognised that many pest species have a biodiversity impact alongside their economic impact and much of the landowner funded pest control in the region also contributes to biodiversity. The focus of Government led pest control activity, as highlighted in the proposed RPMP, also shows a shift towards biodiversity protection. In many instances Canterbury farmers are expected to not only provide and protect indigenous biodiversity habitat on private land in the region, but to control the pest species that threaten this biodiversity and then fund the inspection work to ensure their own compliance.

As highlighted in the tables below from the current RPMS and the RPMP, there is a proposed annual increase in pest management costs of over \$600,000 per year. Despite this, the General Rate contribution to pest control has decreased by over \$80,000 per year, and instead a significant increase in targeted pest rates of over \$850,000 per year is proposed. This increase is justified with less information than the previous RPMS and with very limited consultation with the affected landowners on the details of these changes. Farmers recognise the importance of both pest management and indigenous biodiversity and make considerable personal contributions towards pest control. If Environment Canterbury wants private landowner engagement on the public good that is biodiversity they need to support and work alongside landowners rather than pushing more cost and compliance on farmers with little justification.

Federated Farmers position: Federated Farmers strongly opposes the considerable increase in landowner biosecurity contributions through the targeted pest rate. Federated Farmers asks that Environment Canterbury recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest

control costs in recognition of the public good that the protection of biodiversity on private land provides.

Table 1: Current Regional Pest Management Strategy Anticipated Costs and Revenue

Table 10.4 Anticipated annual costs and revenues

		Revenue by Source (\$)*					
		Targeted Pest Management Rate				General	User Pays
Activity	Cost (\$)	Pest Rating Districts	Uniform	Differential	Possums		
Inspection	1,234,000	729,250	26,500			478,250	
Advice and Education	145,000	32,500				112,500	
Service Delivery	742,300	47,000	73,300	45,000	30,000	547,000	
Enforcement	73,000					18,250	54,750
Pest Management Liaison Committees	105,000					105,000	
Trend Monitoring	213,000		96,500			116,500	
Investigations	120,000		50,000			70,000	
Total	2,632,300	808,750	246,300	45,000	30,000	1,447,500	54,750

* No allowance has been made for any contributions that the Crown may agree to which may result in a reduction in the Pest Management Rates.

Table 2: Proposed Regional Pest Management Plan Anticipated Costs and Revenue

Table 39: Anticipated annual costs and revenues

		Revenue by Source (\$)*			
		Targeted Pest Management Rate			General Rate
Activity	Cost (\$)	Pest Rating Districts	Uniform	Community Pest Initiatives – Banks Peninsula Possums	
Total	\$3,263,963	\$1,665,501	\$122,285	\$109,972	\$1,366,206

* No allowance has been made for any contributions that the Crown may agree to which may result in a reduction in the pest management rates.

5. PROPOSED INSPECTION COST INCREASES

Federated Farmers strongly oppose the proposed increase in inspection/monitoring costs as outlined in Appendix 1. Inspection costs are for the benefit of the region as well as the individual, and Federated Farmers considers that these should be at least shared 50/50 General Rate and Landowner Contribution. Federated Farmers understands the importance of compliance inspections to ensure that the rules of the RPMP are followed, but it is difficult to understand the reasoning that landowners should have to pay for inspections to comply with Environment Canterbury rules when in almost all cases they have already borne the majority of costs for the pest control in the first place. When this sits alongside increasing environmental regulation costs through the Environment Canterbury Land and Water Plan, farmers are faced with a huge financial burden of environmental compliance costs when this money could be better spent delivering actual environmental work on the ground.

Federated Farmers position: Inspection costs should be a 50/50 General Rate and Occupier shared cost. This would serve to reduce the considerable landowner costs and increase the General Rate share for pest control activity that benefits both private landowners and the general public - as is recognised in other regions. For example, in the Marlborough region there is no charge for inspections for species such as rabbits and nasella tussock which are under very similar pest control programmes as those in Canterbury.

6. REMOVAL OF KEY AGRICULTURAL PEST SPECIES FROM RPMP

Federated Farmers opposes the removal of ragwort, nodding thistle and variegated thistle from the proposed RPMP. These are key agricultural pest plant species with a long history of pest management regulation across New Zealand. Federated Farmers understands that compliance activity for these species has been relatively low in recent times, leading to their proposed removal from the RPMP.

Federated Farmers position: Instead of the complete removal of these species from the RPMP, Federated Farmers proposes their inclusion in the Sustained Control programme with boundary control rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint. This would remove the need for costly annual inspections but allow the continued benefit of boundary rules when required. This type of 'upon complaint' programme is successfully run in the Wellington region.

7. INCLUSION OF VELVET LEAF IN THE RPMP

The recent incursion of velvet leaf is recognised as a considerable risk to the arable and pastoral farming industries of the Canterbury region. Federated Farmers is aware that the management of the velvet leaf incursion is still being run by the Ministry for Primary Industries but given the longevity of the seedbank it is inevitable that the ongoing control will become the responsibility of regional councils. Because the RPMP document lasts for 20 years, it is short-sighted not to include this species in the document. Other Regional Councils such as Waikato and Wellington have proposed to include the species despite the response still being run by MPI.

Federated Farmers position: That velvet leaf is added to the Eradication category of the proposed RPMP, with an indication that control is currently funded and coordinated by MPI.

8. NASELLA INSPECTION DATES

Federated Farmers recommends a standardisation of the control inspection deadline for nasella tussock to 31 October for all properties, as opposed to 30 September for those outside the Nasella Control Zone in the proposed RPMP. A standardised date of 31 October avoids stock disturbance from nasella control and monitoring activity during lambing and allows landowners to identify nasella more readily as it develops during the spring. This would still allow a staggered inspection period by Environment Canterbury as landowners who wish to be inspected at an earlier date could do so by arrangement.

Federated Farmers notes that the zones outlined in the map accompanying the RPMP are confusing, making it difficult for landowners to ascertain which category they are in from the material provided. The criteria for being in or out of the zone is also unclear.

Federated Farmers position: Federated Farmers recommends a standardisation of the control inspection deadline for nasella tussock to 31 October for all properties.

9. RUSSELL LUPINS

Federated Farmers understands that some parties have sought to have russell lupins included in the proposed RPMP. Russell lupins have been proven as a valuable fodder crop to stabilise soils in extremely harsh growing conditions such as those of the MacKenzie country. The nitrogen fixing plants are direct drilled into the soil with no tillage and grow where few other palatable plant species can survive. Lincoln University trials have shown that lupins bind fragile soils which might otherwise be blown or washed away and tolerate aluminium levels toxic to other fodder crops such as lucerne. The trials were part funded by the Ministry for Primary Industries' Primary Growth Partnership and are part of the merino company project to improve merino genetics, health and forage.

Russell lupins are a low input fodder species which can conserve fragile soils without the use of irrigation or fertiliser - minimising their environmental impact on sensitive waterways and ground water. Federated Farmers is opposed to their inclusion in the RPMP as the species is extremely widespread and the benefits of any control or management by the Regional Council is questionable.

Federated Farmers Position: Federated Farmers recommends the adoption of an agreed code of practice that sits outside of the RPMP for the responsible use of russell lupins as a cropping species.

10. ABOUT FEDERATED FARMERS

Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

Our members may operate their businesses in a fair and flexible commercial environment;

Our members' families and their staff have access to services essential to the needs of the rural community; and

Our members adopt responsible management and environmental practices.

ENDS

Appendix 1: Monitoring and Inspection cost increases in the Proposed RPMP

	Occupier Cost Current RPMS	New RPMP Occupier Cost	Change
Rabbits			
Inspection	33% High	100%	↑ 67%
Inspection	50% Medium	100%	↑ 50%
Inspection	75% Low	100%	↑ 25%
Wallabies			
Monitoring Inside Containment area and buffer zone	0%	80%	↑ 80%
Control in buffer	0%	80%	↑ 80%
Nassella			
Inspection	50%	75%	↑ 25%
Chilean needle grass			
Inspection	50%	100%	↑ 50%
Broom			
Inspection Production	90%	100%	↑ 10%
Inspection Biodiversity	90%	50%	↓ 40%
Control biodiversity	100%	50%	↓ 50%
Gorse			
Inspection	90%	100%	↑ 10%
Saffron thistle			
Inspection	90%	100%	↑ 10%
Bur daisy			
Inspection	90%	100%	↑ 10%
African feathergrass			
Inspection	90%	10%	↓ 80%
Wilding conifers			
Control	0%	10%	↑ 10%
Monitoring	0%	50%	↑ 50%
Yellow bristle grass	New to RPMP		
Inspection	N/A	100%	
Advocacy and Advice	N/A	50%	
Monitoring	N/A	50%	
Control	N/A	100%	