

From: Ryan Hepburn
To: [Pest Review](#)
Cc: [Treena Davidson](#); [Matthew Ross](#)
Subject: Submission of Te Runanga o Ngai Tahu on the proposed Canterbury Regional Pest Management Plan 2017-2037
Date: Monday, 3 July 2017 3:48:35 PM
Attachments: [TRoNT Submission-Canterbury Regional Pest Management Plan.pdf](#)

Tena koe,

Please find attached the submission of Te Runanga o Ngai Tahu on the proposed Canterbury Regional Pest Management Plan 2017-2037.

Please acknowledge receipt of this submission.

Many thanks,

Ryan Hepburn

*Environmental Advisor
Te Runanga o Ngai Tahu
PO Box 13406 | 15 Show Place
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Te Rūnanga o Ngāi Tahu

Whakaarohia ki a Papatuanuku i mua i te taka mai i tenei imera.

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Te Rūnanga o NGĀI TAHU

3 July 2017

Freepost 1201
Proposal for the Canterbury Regional Pest Management Plan
PO Box 345
Christchurch 8140

Tēnā koe,

RE: Response to Proposal for the Canterbury Regional Pest Management Plan 2017-2037

Thank you for inviting Te Rūnanga o Ngāi Tahu (Te Rūnanga) to provide feedback on the Proposal for the Canterbury Regional Pest Management Plan 2017-2037 (CRPMP).

Te Rūnanga was formed by the Te Rūnanga o Ngāi Tahu Act 1996 to serve the interests of Papatipu Rūnanga across the Ngāi Tahu takiwā. The proposed CRPMP directly relates to the rohe of the ten Canterbury Papatipu Rūnanga, including: Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Wairewa Rūnanga, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki.

Te Rūnanga o Kaikōura have an Iwi Management Plan for their rohe (*Te Poha o Tohu Raumati*, 2005), while Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Wairewa Rūnanga, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, and Te Taumutu Rūnanga also have an Iwi Management for their rohe (*Mahaanui Iwi Management Plan*, 2013). Te Rūnanga o Arowhenua also have an Iwi Management Plan (*Iwi Management Plan of Kati Huirapa*, 1992). These management plans provide guidance on pest management and we strongly urge Council to adopt the principles therein.

Statutory Obligations

Under section 70 of the Biosecurity Act 1993, there is a requirement to provide for:

'the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga'

While under section 72 the council considers whether it is satisfied that:

'the tangata whenua of the area who may be affected by the plan were consulted through iwi authorities and tribal runanga'

Part of the consultation process involves taking into account matters raised by tangata whenua and Iwi authorities, and many of these issues are raised in the aforementioned Iwi Management Plans.

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Provision for ancestral lands, waters, sites, wāhi tapu, and taonga

Te Rūnanga is concerned that the proposed plan may not adequately provide for the relationship of Ngāi Tahu Whānui with their 'ancestral lands, waters, sites, wāhi tapu, and taonga.' Whilst Te Rūnanga is supportive in-principle of the mechanisms proposed, Te Rūnanga notes that there is limited analysis as to how the plan will address pest management issues that are of importance to Ngāi Tahu Whānui. For example, the plan does not identify pest species that are having an impact on Statutory Acknowledgement Areas, wāhi tapu, wāhi taonga or mahinga kai. Te Rūnanga would like to see section 70 of the Biosecurity Act more thoroughly and explicitly addressed in the finalisation of the plan.

One specific appendix to be added to the plan should involve each effected Papatipu Rūnanga identifying ancestral lands, waters, sites, wāhi tapu, and taonga that have pest management issues. A timeframe must be put in place to ensure the appendix is created in a timely manner. This appendix, coupled with the provision for site-led programmes (discussed below), have the potential to positively influence pest management in culturally significant areas.

Consultation and Wider Community Involvement

Te Rūnanga is supportive of the openness of the Council to working with other groups, including funding such groups, to achieve pest management goals. Additionally, we support the provision for site-led programmes wherein Ngāi Tahu, or any other individual or group, may contact the Regional Council and receive assistance in establishing programmes to manage pests on sites that they consider significant. It is essential that funding is set aside in the next Long Term Plan to ensure these site-led programmes can be appropriately supported.

Clear Strategies on Eradication

Te Rūnanga supports the five-tiered approach of pest management which includes an Eradication Programme, an Exclusion Programme, a Progressive Containment Programme, a Sustained Control Programme, and a Protecting Values in Places (Site-led) Programme. This recognises the different threat levels of different pests, as well as how established they are in certain areas, and if they are a pest which is also being used for economic purposes (e.g. wilding conifers on forestry blocks). However, the long-term aim should always be eradication.

Education

One of the most effective ways to achieve pest management goals outside of the regulatory sphere is through education. Te Rūnanga support the provision in the proposed plan to provide education to land-owners and occupiers. It is important, though, that this education is extended to the general public as well as the tourist industry.

Proposed Containment Areas

Te Rūnanga wish to be involved in discussions around the setting of proposed containment or control areas for particular species and further work on classification options, including consideration of new pest species.

Timing and Techniques of Operations

It is important to Manawhenua that pest control operations are designed and implemented so as to avoid impacts on mahinga kai and other cultural values. This includes selection of appropriate pest management tools. One important example of this should be a focus on natural solutions where possible, as opposed to the use of hazardous substances. Furthermore, within many smaller communities in the region people rely on seasonal work for income. Possum hunting and trapping are an example of this in the pest management sphere. We would like to see pest control techniques such as this to continue and be used in conjunction with other methods. To achieve the best results for all parties, on-going dialogue with Manawhenua must occur.

Weighing of Costs

It is important that cultural, community, and environmental considerations do not come secondary to economic factors. All four are important and should be considered with equal weighting.

Monitoring and Surveillance

It is important that adequate pest management monitoring and surveillance is undertaken, and it is encouraging to see Environment Canterbury take responsibility for the monitoring and surveillance of a number of species in the plan. While such monitoring is helpful in measuring the success of pest management efforts, it can also be used to measure the effects of the approaches taken on indigenous flora and fauna. The CRPMP does not contain any provision for monitoring the effects of pest management on indigenous species. We suggest that Environment Canterbury specifically discuss with Papatipu Rūnanga and Environmental Entities provisions in the CRPMP requiring the monitoring and surveillance of indigenous species which includes the power of review where current pest management practice is found to be detrimentally affecting indigenous species.

Best Management Practice

It is important that pest management techniques involving chemical, biological, and any other means to contain or eradicate a pest are done to best management practice. To avoid compromising water quality, applications must consider suitable climatic conditions, not be made directly to water, and have a suitable buffer zone between the point of application and any waterways. Additionally, 'best management practice' is a concept that should not remain static, rather, it should constantly be revised and improved to stay up to date on the latest technological and scientific advancements.

Precautionary Approach

Lastly, we request Environment Canterbury adopts a policy of erring on the side of caution when the risks and effects associated with a particular element of pest control are not known.

We DO wish to be heard in support of our submission.

Signature of person authorised to sign on behalf of persons making submission



Aaron Leith
Acting General Manager | Te Ao Tūroa
Te Rūnanga o Ngāi Tahu

Date: 3 July 2017

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