From:	Maurice Dale
To:	Pest Review
Cc:	Dave Mole; Marcus Girvan; Pete Caldwell
Subject:	LINZ submission on Proposed Canterbury Regional Pest Management Plan
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Attachments:	C16003_02d_Final_CRPMP_Submission_20170703.pdf

Please find attached a submission on behalf of Land Information NZ on the Proposed Canterbury Regional Pest Management Plan.

Please acknowledge receipt of this submission.

Regards

BML Logo

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SUBMISSION ON THE PROPOSED CANTERBURY REGIONAL PEST PLANT MANAGEMENT PLAN 2017 – 2037

To: Proposal for the Canterbury Regional Pest Management Plan
P O Box 345
CHRISTCHURCH 8140

Sent by email to: pestreview@ecan.govt.nz

Submitter: Land Information New Zealand
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Land Information New Zealand ("LINZ") makes the submissions on the Proposed Regional Pest Plant Management Plan ("the plan") in the **attached** document.

LINZ would like to be heard in support of its submission.

David Mole
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Land Information New Zealand
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Dated this 3rd day of July 2017.

Introduction

Land Information New Zealand (LINZ) administers almost 2 million hectares of land owned by the Crown, which is approximately 8% of New Zealand's total land area. LINZ's portfolio includes 1.6 million hectares of high country pastoral land in the South Island, as well as river and lake beds.

LINZ undertakes biosecurity control on unoccupied Crown land. Historically the Crown has not been bound by pest management rules under the Biosecurity Act 1993, and Pest Management Plans. LINZ has however voluntarily undertaken biosecurity control to ensure the Crown acts as a responsible landowner and good neighbour.

LINZ's biosecurity control programme focuses generally on the exclusion, eradication, and management of exotic pest plants and animals on unoccupied land such as river and lake beds. LINZ's biosecurity programmes contribute to protecting primary industries on neighbouring land, and improved biodiversity outcomes by protecting and allowing native species to regenerate. LINZ works with landowners, local authorities, community groups, and other relevant agencies to ensure its biosecurity programmes are prioritised and coordinated to achieve the maximum benefit.

Pest species currently managed by LINZ on unoccupied Crown land in the Canterbury region under its control programme include Gorse and Broom, Old Man's Beard, Pinus Contorta, Lagarosiphon Major, Rabbits, Bennetts wallabies, and Nassella Tussock, as well as a number of invasive species such as Russell lupin, willows and other wilding tree species.

Recent amendments to the Biosecurity Act 1993 introduce changes which place a greater responsibility on the Crown to manage biosecurity risks. In particular, it provides for the ability for 'good neighbour' rules to be included in Regional Pest Management Plans which bind the Crown.

LINZ has a particular interest in the review of the Canterbury Regional Pest Plant Management Plan recognition of the potential implications for the future management of unoccupied Crown land by LINZ. It also has an interest in the implications for the management of all occupied Crown land.

LINZ in particular wishes to ensure that the pest management obligations placed on LINZ and lessees of Crown land are appropriate to the level of biosecurity risk and values to be protected, and are cost effective to implement. This while at the same time ensuring proposed pest management approaches will be appropriate in managing potential spread onto Crown land.

LINZ overall supports the direction and provisions of the Proposed Canterbury Regional Pest Management Plan, except where detailed in the specific submissions in the attached table.

Submissions

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
Section 4.1 – Organisms declared as pests	LINZ supports the list of organisms classified as 'pests' in Section 4.1. LINZ however notes that some wilding conifer species such as *pinus radiata* and Douglas Fir are commercial species, and therefore technically not a 'pest', but rather 'pest agents'. Consequently, LINZ considers it should be made clearer in Section 4.1 those species which are 'pest agents' which are subject to control in the Plan. LINZ also considers that Russell lupin should be added as a 'pest agent' in section 4.1, table 3. The reasons for inclusion of Russell lupin and associated controls in the Plan, is addressed elsewhere in this submission.	1. Retain the organisms declared as 'pests' in section 4.1, however make it clearer as to those commercial species which are 'pest agents', including *pinus radiata* and Douglas fir.
Section 4.2 – Other organisms that may be controlled, and appendix 2 – organisms of interest	LINZ supports in part the list of organisms of interest in the Plan. LINZ however considers that there a number of other invasive tree weed species that are becoming prevalent, particularly in the Canterbury high country. These include Rowan (*Sorbus aucuparia*), silver birch (*Betula pendula*) and White Poplar (*Populus alba*). LINZ considers these species should be added to the list of organisms of interest in the Plan. LINZ also considers that Russell lupin should be declared as 'pest agent' and subject to controls in the Plan. This is addressed elsewhere in this submission. LINZ considers Russell lupin should therefore be removed from the list of 'organisms of interest'.	1. Amend the list of organisms of interest in appendix 2 to include Rowan (*Sorbus aucuparia*), silver birch (*Betula pendula*) and White Poplar (*Populus alba*), and delete Russell lupin *(Lupinus polyphyllus).*
Definition of 'wilding conifer', and table 4 – introduced conifer trees	LINZ supports the definition of 'wilding conifer' on page 15 of the Plan, and the related list of introduced conifer trees set out in Table 4. LINZ in particular supports naturally occurring *Pinus radiata* and Douglas fir being included in table 4 and the definition of 'wilding conifer'. Douglas fir is a particularly invasive species. Their inclusion will ensure they are managed under objective 4 and rules 6.3.1 and 6.3.2, where they are outside of forestry plantations. LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, water yield and production	1. Retain the definition of 'wilding conifer', and the list of introduced conifer trees in table 4.

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	values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to progressively contain and reduce wilding conifers in Canterbury, in support of the National Wilding Conifer Management Strategy 2015 – 2030.	
Section 6.3 – Pests to be managed under progressive containment programme, objective 4 and rules 6.3.1. and 6.3.2	LINZ supports objective 4 and related rules 6.3.1 and 6.3.2 seeking the progressive containment and reduction in the geographic distribution or extent of wilding conifers. LINZ however considers that rules 6.3.1 and 6.3.2 as currently worded are unclear and uncertain. LINZ considers that the trigger for when wilding conifers are to be destroyed should instead refer to where *'they have previously been cleared through control operations'*, rather than where control operations have been undertaken so as to align with the intent of objective 4. LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, and production values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to progressively contain and reduce wilding conifers in Canterbury, in support of the National Wilding Conifer Management Strategy 2015 – 2030.	1. Retain objective 4. 2. Amend rule 6.3.1(a) as follows: *(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~~ they have previously been cleared through control operations; and* 3. Amend rule 6.3.2 as follows: *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~~ they have previously been cleared through control operations on the adjoining property, within 200m of the boundary, since the commencement of the Plan.*
Section 6.4 – Pests to be managed under sustained control programme.	LINZ supports the pests to be included under sustained control programmes set out in section 6.3. However, LINZ considers that Russell lupin *(Lupinus polyphyllus)* should also be included under a sustained control programme. Russell lupin is a perennial herbaceous plant with stout stems growing to 1.5 metres. It grows and matures quickly and forms dense self- replacing stands, which prevents native plants establishing. It produces many long-lived seeds, which are mainly	1. Add Russell lupin *(Lupinus polyphyllus)* as a 'pest agent' to the list of pests to be included in a sustained control programme in table 14. 2. Add a description of the Russell lupin and its adverse effects to section 6.4.

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	spread by water, but also human distribution. It is tolerant to a wide range of conditions. Russell lupin rapidly invades braided river systems, which reduces the available habitat of nesting river birds, including threatened species, and provides cover for predators such as feral cats and mustelids. Dense infestations also cause sand and gravel to build up, altering the morphology of rivers and contributing to flooding and erosion. The distribution of Russell lupin varies through the region. It is absent from a large proportion of the upper catchments, but particularly prevalent in the mid catchment areas where it is easily spread. Russell lupin is also commercially planted as a fodder crop, and cultivated to produce seed for export, and the ornamental plant industry. LINZ spends significant funding on controlling Russell lupin in the Tekapo River and Lake Pukaki shoreline to protect biodiversity values. LINZ considers that Russell lupin should be included in the Plan under a sustained control programme that precludes its establishment in those parts of the region where it does not exist, and requires sustained control elsewhere within a defined containment area with associated boundary and good neighbour rules. The reasons for this are: • The recently proposed New Zealand's Threatened Species Strategy. Braided riverbeds are important habitat for 3 species named in the 150 species of priority threatened and at-risk species. These are black stilt, wrybill and robust grasshopper. Russell lupin provides cover for predators as well as physically invading and eliminating habitat used by these species. • There are new proposals to make large areas of the Mackenzie Basin predator free in line with the Predator Free 2050 programme in order to protect threatened species. Spread of lupin would undermine this work and add costs. • The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places,	3. Add a new objective in section 6.4 for the management of Russell lupin under a sustained control programme, as follows: *Over the duration of the Plan:* *(i) preclude the establishment of Russell lupin populations in the Canterbury region outside of the Russell lupin containment Area to prevent adverse effects to environmental values.* *(ii) sustainably control Russell lupin to preclude land presently free of, or being cleared of Russell lupin within the Russell Lupin Containment Area (refer Map X in Appendix 3) becoming infested, and to prevent adverse effects on environmental values.* 4. Add new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows: *All occupiers outside the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate all Russell lupin infestations on land that they occupy.* *For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.* *A breach of this rule creates an offence under section 154N (19) of the Act.* *All occupiers within the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate Russell lupin within 10 metres of an adjoining property boundary.* *For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.* *A breach of this rule creates an offence under section 154N (19) of the Act.*

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	she highlights the impacts of Russell lupins on threatened native bird species. The planting of Russell lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, LINZ supports its inclusion as a 'pest agent' in the Plan which enable its planting for commercial use within the defined containment area, but require their wilding progeny outside of plantations to be controlled. In this way, it would be similar to the approach taken to some commercial conifer species in the Plan, such as *pinus radiata* and Douglas fir. The exact distribution of Russell lupin in the region is uncertain, and therefore the extent of any preferred containment area has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan. An alternative approach to its inclusion in a sustained control programme may be to declare Russell lupin a pest organism in the Plan, with exemptions granted by a Chief Technical Officer for limited plantings to be carried out with conditions. If spread continues or landowners do not meet conditions the exemption would be removed. Such conditions could include no planting within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers. In addition to its inclusion under a sustained control programme, LINZ supports the inclusion of Russell lupin in a site led programme for the upper Rangitata and Rakaia catchments. This is addressed elsewhere in this submission.	*Note: This is designated a Good Neighbour Rule* *All occupiers within the Russell lupin Containment Area shall on receipt of a written direction from an Authorised Person, eliminate Russell lupin infestations on their land within 10 metres of the adjoining property boundary where the occupier of the adjoining property is eliminating Russell lupin infestations within 10 metres of that boundary.* *For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.* 5. Amend Appendix 3 Maps, by including map of new Russell lupin Containment Area (DOC and LINZ to supply maps prior to hearing). 6. Make any other consequential changes needed to the plan to address this submission point.
Section 6 – Pests to be managed under sustained control programme, objective 6, and rule 6.4.2	LINZ supports in part objective 6 and related good neighbour rule 6.4.2 seeking the sustained control of Bennett's Wallaby to ensure population densities remain at or below Level 3 on the Guilford Scale within the Wallaby contaminant area. It also supports precluding the establishment of populations outside the containment area. Sustained control will ensure effects of Wallaby populations on biodiversity and production values are minimised.	1. Retain objective 6 2. Amend good neighbour rule 6.4.2 as follows: ***Note: This is designated a Good Neighbour Rule*** *An occupier within the Wallaby Containment Area shown on Map*

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	LINZ however considers that an exemption should be included in rule 6.4.2 from having to control Wallaby where an effective boundary fence is in place along the entire length of the common boundary which prevents Wallaby's crossing into the neighbouring property. LINZ also questions whether this rule meets the criteria of a good neighbour rule in that it does not specify a distance from the boundary within which control of wallaby densities are required. LINZ would support the inclusion of an appropriate boundary distance; such as is proposed in DOC's submission. LINZ also considers that a rule should be included in Plan requiring occupiers to report Wallaby sightings outside the containment area. The inclusion of such a rule important in ensuring the containment aims of objective 6 are met.	*2 in Appendix 3 shall, on receipt of a written direction from an Authorised Person, control Bennett's wallaby densities on land they occupy to at or below Level 3 on the Guilford Scale where the occupier of adjacent land is taking reasonable steps to manage wallabies on their land.* *The provisions of this rule do not apply where there is a boundary fence along the entire length of the common boundary of the property which is effective in preventing wallaby crossing into the neighbouring property.* *A breach of this rule creates an offence under section 154N(19) of the Act.* 3. Add a rule under rule 6.4.2 requiring occupiers outside of the containment area to report any sightings of wallaby on their property to ECAN.
Section 6.4 – Pests to be managed under sustained control programme, objective 8, and rule 6.4.5	LINZ supports objective 8 and related good neighbour rule 6.4.5 seeking the sustained control of Broom to preclude land that is free of, or being cleared of broom, becoming infested. Sustained control will ensure effects of Broom on production values are minimised.	1. Retain Objective 8, and good neighbour rule 6.4.5.
Section 6.4 – Pests to be managed under sustained control programme, objective 13, and rule 6.4.11.	LINZ supports in part objective 13 and related good neighbour rule 6.4.5 seeking the sustained control of Feral Rabbits to ensure population levels do not exceed Level, 3 on the Modified McLean Scale. Sustained control will ensure effects of Feral Rabbits on biodiversity and production values are minimised. LINZ however considers that an exemption should be included in rule 6.4.11 from having to control rabbits where an effective boundary fence is in place along the entire length of the common boundary which prevents rabbits crossing into the neighbouring property.	1. Retain objective 13 2. Amend good neighbour rule 6.4.11 as follows: ***Note: This is designated a Good Neighbour Rule*** *An occupier within the Canterbury region shall, upon receipt of a written direction from an Authorised Person, control feral rabbit densities on their land to at or below Level 3 on the Modified McLean Scale within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also controlling feral rabbit densities at or below Level 3 on the Modified McLean Scale within 500 metres of the boundary.* *The provisions of this rule do not apply where there is a rabbit proof boundary fence along the entire length of common*

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		boundary of the property which is effective in preventing rabbits crossing into the neighbouring property. *A breach of this rule creates an offence under section 154N(19) of the Act.*
Section 6.4 – Pests to be managed under sustained control programme, Objective 14 and rule 6.4.13.	LINZ supports objective 14 and related good neighbour rule 6.4.13 seeking the sustained control of Gorse to preclude land that is free of, or being cleared of gorse, becoming infested. Sustained control will ensure effects of Gorse on production values are minimised.	1. Retain objective 14, and good neighbour rule 6.4.13.
Section 6.4 – Pests to be managed under sustained control programme, objective 15 and rule 6.4.16	LINZ supports objective 15 and related good neighbour rule 6.4.16 seeking the sustained control of Nassella Tussock to ensure population levels do not increase. Sustained control will ensure effects of Nassella Tussock on production values are minimised.	1. Retain objective 15, and good neighbour rule 6.4.16.
Section 6.4 – Pests to be managed under sustained control programme, objective 16, and rule 6.4.19	LINZ supports objective 16 and related good neighbour rule 6.4.19 seeking the sustained control of Old Man's Beard to ensure plant numbers or density levels do not increase. Sustained control will ensure effects of Old Man's Beard on biodiversity values are minimised.	1. Retain objective 16, and good neighbour rule 6.4.19.
Section 6.5 – Pests to be managed under site led programmes, objective 20, and maps 7.3 and 7.4	LINZ supports objective 20 and related Maps 7.3 and 7.4 seeking site led sustained reduction of Broom by 10% within the upper Rangitata and Rakiaia catchments. Site led sustained control will ensure the effects of Broom on biodiversity and production values are minimised.	1. Retain objective 19, and maps 7.3 and 7.4.

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Section 6.5 – Pests to be managed under site led programmes, and appendix 3 Maps	LINZ supports the site led programmes set out in section 6.5. However, LINZ considers that Russell lupin *(Lupinus polyphyllus)* should also be included in site led programmes for the upper Rangitata and Rakaia catchments where it is having significant adverse effects on biodiversity values. Russell lupin is a perennial herbaceous plant with stout stems growing to 1.5 metres. It grows and matures quickly and forms dense self- replacing stands, which prevents native plants establishing. It produces many long-lived seeds, which are mainly spread by water, but also human distribution. It is tolerant to a wide range of conditions. Russell lupin rapidly invades braided river systems, which reduces the available habitat of nesting river birds, including threatened species, and provides cover for predators such as feral cats and mustelids. Dense infestations also cause sand and gravel to build up, altering the morphology of rivers and contributing to flooding and erosion. The distribution of Russell lupin varies throughout the region. It is absent from a large proportion of the upper catchments, with the exception of the upper Rangitata and Rakaia catchments. LINZ considers a site led programme be included for the management of Russell lupin in this area. The reasons for this are: • The recently proposed New Zealand's Threatened Species Strategy. Braided riverbeds are important habitat for 3 species named in the 150 species of priority threatened and at-risk species. These are black stilt, wrybill and robust grasshopper. Russell lupins provide cover for predators as well as physically invading and eliminating habitat used by these species. • There are new proposals to make large areas of the Mackenzie Basin predator free in order to protect threatened species. Spread of lupin would undermine this work and add costs. • The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places, she highlights the impacts of Russell lupins on threatened	1. Add Russell lupin *(Lupinus polyphyllus)* as a 'pest agent' to the list of pests to be included in a site led programme in table 29. 2. Amend objective 19 as follows: *For each site in the Canterbury Region listed in Appendix 3, progressively control, where present:* *(i) Cathedral Bells* *(ii) Banana Passionfruit* *(iii) Old man's beard* *(iv) White-edged nightshade* *(v) Wild Thyme* *<u>(vi) Russell lupin</u>* *To avoid, mitigate or prevent damage to the specific values particular to each site.* *For each site, the first 10 years of the Plan's operation will result in the* *(i) Extent of Cathedral bells being reduced by 30%;* *(ii) Extent of banana passionfruit being reduced by 50%;* *(iii) Extent of old man's beard being reduced by 75%;* *(iv) Number of possums being reduced to 5% RTC;* *(v) Extent of white-edged nightshade being reduced by 10%;* *(vi) Extent of wild thyme being reduced by 50%* *<u>(vii) Extent of Russell lupin being reduced by XX%</u>* (DOC and LINZ to confirm reduction goal prior to hearing).

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	native bird species. The exact distribution of Russell lupin in the catchment is uncertain, and therefore the extent of the area subject to any site led programme, and the goal for reduction of distribution within the first 10 years of the Plan has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.	3. Amend Appendix 3 Maps, by including maps of new site led programmes for Russell lupin for the upper Rangitata and Rakaia catchments (DOC and LINZ to supply maps prior to hearing). 4. Make any other consequential changes needed to the plan to address this submission point.