

From: David Newey
To: [Pest Review](#)
Subject: Submission on the Canterbury Regional Pest Management Plan from the Director General of Conservation.
Date: Monday, 3 July 2017 4:20:26 PM
Attachments: [DOC Submission on Ecan Regional Pest management Plan 2017 2037 - DOC-3092195.pdf](#)

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Introduction

The Department of Conservation (DOC) manages significant areas of land in Canterbury and is actively engaged in biosecurity work, pest control and management within the region. Historically the Crown has not been bound by pest management rules under the Biosecurity Act 1993, and Pest Management Plans. DOC has however voluntarily undertaken biosecurity control to ensure the Crown acts as a responsible landowner and good neighbour.

DOC's biosecurity control programme focuses generally on the exclusion, eradication, and management of exotic pest plants and animals on land which it is responsible for. These programmes contribute to protecting both primary industries on neighbouring land, and improved biodiversity outcomes by protecting and allowing native species to regenerate. DOC 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 DOC in the Canterbury region under its control programme include Gorse and Broom, Old Man's Beard, various pine species, Rabbits and Bennetts wallabies, 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.

DOC has a particular interest in the review of the Canterbury Regional Pest Plant Management Plan, ensuring the pest management obligations placed on DOC are appropriate to the level of risk and values to be protected, and are cost effective to implement.

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

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1.	Proposed Canterbury Regional Pest Management	Support unless otherwise indicated in this submission	The Director General supports the various Objectives, Principle Measures and Rules in this Plan, where not otherwise referred to in this submission, as being appropriate in giving effect to the Biosecurity Act.	Retain
2.	Plan establishment Section 1.2“Purpose”	Support	The Director General supports the purpose of the plan	Retain
3.	Section 4.1 Organisms declared as pests	Support in part	<p>The Director General supports the list of organisms declared as pests. There however also needs to be a category of species that are both pests and have a commercial use. These are “pest agents”.</p> <p>The Director-General submits that Brown Bull-headed Catfish are hopefully absent from the Region, however, this species is not covered by either Noxious fish or Unwanted Organism status.</p>	<p>Organisms that have a commercial use and are a pest should be classified as a “pest agent” to enable better inclusion and enable rules around controlling the self-seeded offspring of the pest agents. Organisms should include; Douglas fir, Bishops pine, Maritime pine, Ponderosa pine, Radiata pine, and, Russell lupin. Larch species are all invasive, we suggest pest agent status for Japanese larch and any hybrid between Japanese and European larch.</p> <p>Include Brown Bull-headed Catfish (including in Table 5) recognising that the species could be deliberately spread to waterways. Such status would impose an objective of exclusion</p>

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				from the Region for this species.
4.	Section 4.2 Other Organisms that may be controlled	Support in part	<p>The Director General supports a list of Organisms of Interest and those organisms currently on the list, except Russell lupin. The Director General seeks a greater action on Russell lupin and seeks it be declared a pest or a pest agent.</p> <p>In addition, during recent wilding conifer control work, and staff observations, several tree weed species were recorded that are becoming more prevalent invasive weeds (particularly in the high country). The Director General seeks inclusion of additional tree weed species in the Ool category.</p>	<p>Russell lupin should be reclassified as either a pest or a pest agent. Pest agent would enable rules to control wild Russell lupin as well as allow for some commercial use.</p> <p>The following tree weed species are added to the Ool category: Rowan (<i>Sorbus aucuparia</i>), and silver birch (<i>Betula pendula</i>)</p>
5.	Section 5.3 “Principle measures to manage pests”	Support in part	The Director General considers that effective site led programs require, in many cases, strong collaboration with other agencies and/or groups of land occupiers.	Add new principal measure; Collaboration. Council will collaborate with other agencies and land occupier groups, including the development of agreements, for the effective management of pests to protect the values of specific sites.
6.	Section 5.4 Rules	Support in part	The Director General supports the inclusion of Good Neighbour Rules for the species listed. These	Adjust proposed rules to include a distance that meets the requirements of the National

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			<p>are rules that bind Crown agencies. Good Neighbour rules must align with the Biosecurity Law Reform Act 2012 and the National Policy direction which has accompanying guidance material. We do not agree rules for Bennetts wallaby and Nassella tussock meet good neighbour rule requirements.</p> <p>The Director General seeks additional rules for wilding conifers.</p>	<p>Policy Direction. We suggest a 20m boundary distance for Nassella Tussock, and a 1km boundary distance for Bennetts wallaby. The 1km distance is consistent with the document provided as supporting the proposed plan and is titled "Meeting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits.</p> <p>Additional rules for wilding conifers will be addressed in other sections of our submission further on.</p>
7.	Section 6.3 Progressive Containment Programme	Support in part	<p>The Director General generally supports the concept of progressive containment and strongly supports the inclusion of wilding conifers. Douglas fir is a particularly invasive wilding conifer. It is recognised as the second most invasive species after Contorta pine.</p> <p>The Director General supports inclusion of European larch but note other larch species are also invasive pests.</p>	<p>Add a section on Table 12 for Douglas fir, and the other main wilding conifer species that are not declared pest organisms. The description would be for "pest agent and adverse effects".</p> <p>Add Japanese larch and any hybrid between Japanese and European larch with pest agent status to Table 12.</p> <p>Include Banks Peninsula in the Progressive</p>

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			Wilding conifer are expanding on parts of Banks Peninsula and this area should be included in the progressive containment area.	containment programme
8.	Plan Rule 6.3.1	Support in part	There may also be instances where coning wilding conifers need removal.	Include coning wilding conifers within the rule or have an additional rule for coning wilding conifers.
9.	Plan Rule 6.3.2	Support in part	There are other areas where wilding conifer work is also undertaken and a good neighbour rule should also apply outside the wilding conifer containment area	Broaden the rule to include areas outside the wilding conifer management area, or, add a rule for areas outside the wilding conifer containment area.
10.	Section 6.4 Sustained Control Programme	Support in part	The Director General considers that sustained control of pests is vital. There are however additional pests which, due to their nature, spread and effect should be included in this section of the plan.	Retain with amendments outlined in this submission.
11.	Plan Objective 6	Support in part	The Director General recognises the benefit of a wallaby containment area and the wider benefit of preventing wallaby in other parts of Canterbury. The Director General notes there is no longer a rule whereby land occupiers are required to report wallaby sightings outside the containment area. Such a rule is useful to achieve plan Objective 6.2	Either add a rule, or ensure there is an awareness plan that seeks land occupiers report the occurrence of wallaby outside the containment area.
12.	Plan Rule 6.4.2	Reject.	The Director General does not agree that this rule	Re write the rule to what would be an

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			<p>meets the criteria of the of a good neighbour rule. Where there is effective fencing and there is no pest spread across a boundary issue, a good neighbour rule would not apply in this instance.</p> <p>The Director General recognises the need to keep wallaby levels at or below 3 on the Guilford scale and intends to control wallaby on DOC land to meet this requirement so long as it has sufficient funds. The Department has budget constraints as well as other pest control priorities that may require reprioritisation of limited funding (examples are the recent Myrtle rust incursion and an expansion of Russel Lupin work to meet the newly proposed threatened species strategy). We welcome opportunities to join any inter-property co-ordinated control approaches.</p>	<p>acceptable good neighbour rule. We suggest a 1km boundary distance for Bennetts wallaby. This is consistent with the document provided as supporting the proposed plan and is titled "Meeting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits.</p> <p>During consultation, we had with Regional Council staff a 500m and 1km distance were options considered.</p> <p>Recognise that if an effective fence prevents wallaby from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.</p>
13.	Plan Rule 6.4.4	Support in part	The Director General supports this rule. Public Conservation Land is normally available to recreational hunting and the activity is encouraged to reduce wallaby numbers. A reasonable time needs to be specified so hunters and DOC staff can continue this activity with full knowledge of closure periods.	Specify time periods in the rule or make the closure periods well communicated to affected parties via an effective communications plan.

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14.	Plan Objective 8	Support in part	<i>Spartium junceum</i> , commonly known as Spanish broom appears to be an omission. It is another invasive species and is expanding its range.	Addition of this species
15.	Plan Rule 6.4.11	Support in part	Where there is effective fencing and there is no cross-boundary issue, a good neighbour would not apply in this instance.	Recognise that if an effective fence prevents feral rabbits from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.
16.	Plan Objective 14	Support in part	On Public Conservation Land gorse is often used as a nurse crop for native plant restoration. This is a better alternative for conservation as it avoids use of expensive herbicides. Allowing reversion to native cover eliminates gorse from a site meeting plan Objective 14. Where herbicides are used the site often reverts back to gorse.	Recognition that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective.
17.	Principle measures to be used for Objective 14	Support in part	As above gorse can be a nurse crop in some situations	Recognition that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective.
18.	Plan Rule 6.4.14	Support in part	Recognition that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the	Private land occupiers should not have to meet the requirements of this rule in situations where they are restoring native vegetation

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			plan objective. The Director General notes that Crown agencies are not bound by this rule.	cover using gorse as a nurse crop.
19.	Plan Rule 6.4.15	Support in part	Should not be hedges within 10m of Public Conservation Land as these contribute to ongoing seed source and spread.	No (new) gorse hedge should be located within 10 of public conservation land where gorse is being controlled
20.	Plan Objective 15	Support	The Director General has undertaken or enabled Nassella tussock control on Public Conservation land to date and intends to continue with this level of control.	Retain
21.	Plan Rule 6.4.16	Reject	The Director General does not agree that this rule meets the criteria of the of a good neighbour rule.	Amend the rule to what would be an acceptable good neighbour rule with a suggested 50m rule distance.
22.	Table 27	Support in part	The current description underrates the significance of this invasive species.	Insert into the description "Purple Loosestrife is rated in the top 100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)", and "It impacts on environmental and agricultural values, as well as impacting on kai and taonga species important to Ngai Tahu.
23.	Section 6.4	Proposed addition of Russell Lupin	The Director General considers Russell Lupin - <i>Lupinus polyphyllus</i> should also be included under a sustained control programme. In coming to this conclusion, we considered three recent initiatives pertinent to our submission. These are: 1. The recently proposed Threatened Species	1. Add Russell Lupin, <i>Lupinus polyphyllus</i> as a 'pest agent' to the list of pests to be included in a sustained control programme in Table 14.

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			<p>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.</p> <p>2. 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.</p> <p>3. 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 native bird species.</p> <p>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</p>	<p>2. Add a description of the Russell Lupin and its adverse effects to Section 6.4.</p> <p>3. Add a new objective in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p><u>Over the duration of the Plan:</u></p> <p>(i) <u>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.</u></p> <p>(ii) <u>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.</u></p> <p>4. Add new rules in Section 6.4 for the management of Russell Lupin under a</p>

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			<p>conditions.</p> <p>Russell Lupin rapidly invades braided river systems, which reduces the available habitat of nesting river birds such as dotterels and wrybills, 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.</p> <p>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. DOC spends significant funding on controlling Russell Lupin in the Mackenzie Basin waterways, Rangitata River, Rakaia River, Waimakariri River, Waiau and Clarence upper catchments, Ashburton Lakes area and Bealey Valley to protect biodiversity values.</p> <p>Given the effects that it can have on biodiversity values, DOC considers that it 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</p>	<p>sustained control programme, as follows:</p> <p><u>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.</u></p> <p><u>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</u></p> <p><u>A breach of this rule creates an offence under section 154N (19) of the Act.</u></p> <p><u>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall eliminate Russell Lupin 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.</u></p> <p><u>A breach of this rule creates an offence under section 154N (19) of the Act.</u></p> <p><u>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall</u></p>

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			<p>containment area with associated boundary and good neighbour rules.</p> <p>The planting of Russell Lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, DOC 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 <i>pinus radiata</i> and Douglas Fir.</p> <p>The exact distribution of Russell Lupin in the region is uncertain, and therefore the extent of any 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.</p> <p>The Director General also recognizes the spread mechanisms of this weed species (via water and flooding, sale and deliberate spread of seed, gravel</p>	<p><u>eliminate Russell Lupin within 10 metres of an adjoining property boundary.</u></p> <p><u>A breach of this rule creates an offence under section 154N (19) of the Act.</u></p> <p>Include a Good Neighbour rule for areas where Russell lupin is widespread. A 10m distance would be consistent with GNR for similar species such as gorse and broom.</p>

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			<p>extraction and movement of contaminated gravel to new sites, dispersal via machinery and considers a Regional Pathway Management Plan may also be useful.</p> <p>An alternative approach may be to declare Russell Lupin a pest organism, with exemptions granted under the Biosecurity Act 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.</p>	
24.	Section 6.5	Support in part	Goats on Banks Peninsula – extensive interagency co-operation is currently occurring and including Goats as a pest agent on the Peninsula would enable another tool to be used to eradicate wild goats there.	<p>Include Goats as a pest agent in Table 29 and include an appropriate addition to Objective 19 and Appendix 3.</p> <p>The Regional Council to prepare a Cost/Benefit analysis for Goats as a pest agent on Banks Peninsula.</p>

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25.	Table 30	Support in part	The current description underrates the significance of this invasive species.	Insert into the description “Spartina is rated in the top 100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)”, and “It impacts on environmental values, recreational usage, impacts on kai and taonga species important to Ngai Tahu, and, commercial fisheries. Estuaries are recognised as important habitats for some juvenile fish species harvested by commercial fisheries.
26.	Plan Objective 19	Support in part	With the recent additional funding of \$50,000 provided to ECAN for Spartina control it is possible to reduce the area of Spartina by considerably more than 50%	Revise the area that Spartina will be reduced by from 50% to a higher percentage
27.	9.2 Analysis of benefits and costs/Table 34	Support in part	The Director General appreciates the work that has gone into the analysis of benefits and costs. There are some inaccuracies and omissions in the analysis for some species. Our concerns mainly lie with wilding conifers, Bennetts wallaby, purple loosestrife, Spartina, gorse, and broom. An analysis of costs and benefits for Russell lupin is desirable. There are significant and increasing costs to control this species at important sites. There may be a marginal benefit as a fodder crop. Fodder crop growers have alternative and less invasive	Review analysis of costs and benefits if the species are either removed from the strategy or substantial changes are proposed in the final plan. Conduct an accurate analysis of costs and benefits for Russell lupin.

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			fodder crop options. The seed is long-lived and spreads via water, shingle extraction and machinery. It has potential to become an intractable weed issue once established. We do not agree with the assessment and comments on this weed as described on page 189 of the analysis of costs and benefits table.	
28.	9.4 Beneficiaries and exacerbators/Table 35	Support in Part.	Wilding conifers. Beneficiaries and exacerbators are not fully identified for wilding conifers in table 35. In the supporting analysis of costs and benefits, hydro benefits and benefits for irrigated land amount to 50% collectively. Active exacerbators are those who plant wilding conifers for woodlots, carbon forests, shelter, and, amenity plantings. These include the planting wilding conifer species and those species considered as “pest agent” species such as Douglas fir. These types of planting are seed sources for distant spread in high winds. The result is substantial ongoing expenditure is required to carry out surveillance and control of scattered wilding conifers over large areas to prevent wilding conifer spread. This is a significant cost for Crown agencies and neighboring lands.	Adjust table to better identify active exacerbators, and identify water users as the main beneficiary of this work.

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29.	9.5 Cost Allocation and funding rationale/Table 36	Support in part	<p>Wilding conifers. This is a serious and expanding weed issue in Canterbury and even with the MPI national program funding a much larger control effort, more funding is required.</p> <p>Better identifying active exacerbators and seeking a contribution from them is fair will reduce the funding shortfall. It will also be an incentive to plant alternative species that do not cause spread in parts of the region vulnerable to wilding conifer invasion.</p> <p>Water is a significantly undervalued resource. Protection of Canterbury's water sensitive catchments from wilding conifer invasion maintains water yield and helps maintain water quality. Hydro benefits and benefits for irrigated land amount to 50% collectively. Seeking a contribution from water users is fair and their contribution would reduce the funding shortfall.</p> <p>Water abstractors are prepared to pay considerable amounts for new water abstraction projects which provides evidence that they would</p>	<p>Cost allocation for wilding conifers should include active exacerbators and seek a fair contribution from them. Water users are a main beneficiary and a fair funding contribution should be sought.</p>

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			pay for protecting water that would be lost to them if wilding conifers established in their water catchments. These actions align with the wording in section 9.5	
30.	Appendix 2 Organisms of Interest	Support in part	There are other plant species which have been detected from time to time in Canterbury and which would have significant effect if they established here. Including these species as Organisms of Interest would be appropriate and cost effective.	Include Senegal tea (<i>Gymnocoronis spilanthoides</i>) and Parrots feather (<i>Myriophyllum demersum</i>) in Appendix 2.