

From: Elvidge, Libby
To: [Pest Review](#)
Cc: [Greene, Brenda](#)
Subject: Christchurch City Council submission - Proposal for the Canterbury Regional Pest Management Plan
Date: Monday, 3 July 2017 4:44:40 PM
Attachments: [Proposed Canterbury Regional Pest Management Plan Submission.pdf](#)

Good afternoon

Please find attached the Christchurch City Council submission on the **Proposal for the Canterbury Regional Pest Management Plan**.

If you have any queries, please contact Brenda Greene on 941 8044 or Brenda.greene@ccc.govt.nz

Kind regards

Libby Elvidge

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

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Return your signed submission by 5:00pm, Monday 3 July 2017:

By Post:
Freepost 1201
Proposal for the Canterbury Regional Pest Management Plan
P O Box 345
Christchurch 8140

Or by email:
pestreview@ecan.govt.nz

Full Name: Brenda Greene **Phone (Hm):** _____
Organisation*: Christchurch City Council **Phone (Wk):** 03 9418044
* the organisation that this submission is made on behalf of (where applicable)
Postal Address: 53 Hereford St, Christchurch **Phone (Cell):** _____
Postcode: 8011
Email: brenda.greene@ccc.govt.nz **Fax:** 941 8337
Contact name and postal address for service of person making submission (if different from above):

Signature: _____ **Date:** _____
(Signature of person making submission or person authorised to sign on behalf of person making the submission — Please note a signature is not required if the submission is made by electronic means).

I do not wish to be heard in support of my submission

☐
☐
☐

3 July 2017

Proposal for the Canterbury Regional Pest Management Plan
Environment Canterbury
pestreview@ecan.govt.nz

To whom it may concern

Introduction

1. Christchurch City Council staff (Council staff) appreciates the opportunity to comment on the revised the Proposed Canterbury Regional Pest Management Plan (the Plan).
2. We would like to congratulate Environment Canterbury (ECan) on the extent of the consultation undertaken, and the certainty that the maps provide as to where ECan intends to focus regulation. Council staff acknowledge the constructive policy and operational partnership with ECan, and looks forward to continuing existing control programmes into the future.
3. Should you require any further information, please contact Brenda Greene by telephone at 03 941 8044 or Brenda.greene@ccc.govt.nz.

Submissions

General comments

4. The Plan differs in focus to the prior Canterbury Regional Pest Management Strategy 2011-2015 (the Strategy). The Plan focuses on the 'why' (cost benefit analysis) and the what (e.g. pests, the principal measures). In contrast, the Strategy focus was on the 'what and the how' (e.g. processes).
5. We appreciate that national directives require ECan to transition to a risk management framework. As such, the Plan provides a good analysis of pests and their costs and benefits, and we support the principle of the Good Neighbour Rules. The tone and audience of the Plan, however, appears to be for enforcement staff rather than the public or landowners/occupiers.

We recommend that a greater focus on 'how' would make the plan easier for landowners/occupiers to understand.

6. The change in focus and funding will give ECan greater flexibility to act quickly in response to emerging risk. However, it needs to be made clear how ECan will maintain its existing progressive containment, sustained control and site-led programmes, and how new ones can be developed.

We recommend that the Plan clarifies how ECan will maintain existing, and develop new programmes, including through its long standing partnerships with the Council, the Department of Conservation, and the community.

7. The requirement to act occurs only when rules dictate. This means that puna grass in

the progressive containment programme and bur daisy and saffron thistle, and all unwanted organisms in the sustained control programme have no requirement to act.

We recommend that rules for these pests are provided, including how objectives will be met, and how land occupiers can be expected to accept the costs allocated and funding rationale given on pages 89 and 90.

8. The regulatory focus of the Plan clearly outlines the roles and responsibilities of enforcement staff, but the provision of partnerships both “inside” and “outside” the plan, how the Council reports through Operations Plans and Pathway Management Plans needs to be clearly outlined.

Change in lead agency for feral goats

9. We note the change in lead agency for feral goats. While DOC has powers under the Wild Animal Act, it also has powers under other legislation to control a wide range of pests listed in the Plan. Changing the lead agency creates uncertainty for a 20 year long successful programme lead by ECan in partnership with the Council and DOC. We question the need to “fix” something that is not broken.

We recommend that feral goats be declared a pest, and that ECan supports DOC by providing another tool to assist in achieving the objective.

Partnerships

10. The Plan needs to provide certainty for agencies, community leaders and non-governmental groups committed to existing partnerships with ECan. For example, previously the Community Initiative Programme to control possums and rabbits on Banks Peninsula was a process “inside” the Plan, but is now “outside” the Plan. To provide certainty, the Plan needs to specify how existing programmes are supported.
11. Financial, leadership and/or regulatory support by ECan “outside” the plan may be provided through a private plan change to the Strategy, or through the Long Term Plan and/or Annual Plan processes or through the Operations Plan (*Council staff preference*) or by other means. The Plan should either specify this or include a process “inside” the Plan.
12. If all funding and reporting is to be directed through the Annual Plan process and an “internal” Operations Plan, Council staff have some concerns that ECan’s requirements under the Local Government Act 2002 to provide transparency may not be met, particularly in regards to the costs and Levels of Service provided to achieve the plan objectives, and how well the resulting specific, measurable, achievable, relevant and time bound objectives are met.

We recommend that further thought is given to the rationale for partnerships that are “inside” and “outside” the plan.

13. If all partnerships with other governmental and non-governmental organisations are “outside” the Plan, then by definition Pest Management Liaison Committees are “outside” the plan. If this is the case, this section needs to be removed from the plan.
14. If Pest Management Liaison Committees are “inside” the plan then a rationale for their role needs to be defined – is it now regulatory? If the role is not defined then the plan needs to state that their role will be reviewed. If the role is not reviewed, then existing partnerships such as the Community Initiative Programme (CIP) need to remain “inside” the plan.

15. The Plan encourages community leadership for the coordinated control of widespread pests under the sustained control and site led programmes. Leadership is demonstrated through the “War on Pests Guide for landowners on Banks Peninsula”, and “2050 Ecological Vision 2050”, “Te Waihora Joint Management Plan” jointly prepared by ECan and community leaders. These plans (and others) demonstrate how support for pest control from ECan and others can be secured. If this is how ECan intends to establish partnerships “outside” the Plan, to provide certainty, this needs to be stated.

Partnerships should have a financial commitment, with a lead agency clearly identified.

Pathway Management Plans

16. It is a requirement of the national review of pest management strategies that Pathway Management Plans are developed. The Plan gives these pathway plans only a passing mention.

We recommend that Pathway Management Plans will be developed within a specific (less than 5 year) time frame and be led by ECan.

Define “measure of procedure”

17. The Plan states that ECan will use section 5.3 as a “measure of procedure” for species without any rules in place. It could be that the “measure of procedure” actually means “principle measures”. If not, it needs to be defined. If it is, then “measure of procedure” needs to be replaced by “principal measures”. This may be an unintentional error, so we assume that the measure of procedure means principle measures.

We recommend that “measure of procedure” is clarified.

Yours faithfully



Brendan Anstiss
General Manager, Strategy and Transformation
Christchurch City Council


(1) The specific provisions of the Proposal that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific parts/provisions of the Proposal, or wish to have them amended, and the reasons for your views)</i>		(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each part/provision. The more specific you are the easier it will be for the Council to understand your concerns)</i>
Part & Page Number	Sub-part/ Provision	Oppose/support (in part or full)	Reasons	
3	ECan intends to explore development of a pathway management plan in the future	Support in part Amend	The plan encompasses the future from 2017-2037. A timeframe for pathway development plans should be stated.	After The 2012 amendments to the Act provide for regional pathway management plans. These plans.....area. Add ECan will develop pathway management plans for AND state priority pathways and locations OR provide locations on a map OR The CRPMP will be reviewed within 5 years to include Pathway Development plans for AND state priority pathways OR provide locations on a map.
3		Amend	To guide implementation, we suggest principles be included in the Strategic background.	After the first paragraph that ends with "Landowners and/or occupiers and the wider community.....policies and plans." Add The following principles will be used to guide and prioritise implementation of the Strategy 1. Pest-free areas shall be maintained pest free where possible 2. Where a range of control methods exist that are able to be used effectively by landowners, promote community education, awareness and ownership of pest issues, and build community capacity.
3	The Act requires.....these are internal....which provide technical information...CRPMP.	Oppose in part Amend	Page 3 of the CRPMP states The Act also requires the preparation of an operational plan and annual reporting on the Operational Plan, in accordance with section 100B. These are internal Environment Canterbury documents which provide technical.....CRPMP. internal is incorrect as S100B states that Operational plan reports can be included in annual reports or to the public as a separate document, or as an extract from the annual report. We support the preparation and publication of an annual operations plan that specifies the budget spent	The Act also requires the preparation of an operational plan and annual reporting on the Operational Plan, in accordance with section 100B. These are internal- Environment Canterbury documents which provide technical.....CRPMP, specify the budget spent per annum and trends in the density or index of abundance of a pest over a specified area and time frame. ECan will prepare Operational Plans as a separate, publicly available document.

			per annum and trends in the density or index of abundance of a pest over a specified area and time frame.	
4	2.1.2	Amend	<p>List key Regional and District Council Plans and Strategies that are influenced by and influence the RPMP.</p> <p>ECan acts on behalf of the Chatham Islands Council. The Chatham Islands is free of many pests that are widespread in Christchurch. Although Christchurch City is a low risk from new arrivals from outside NZ, Christchurch Airport is a risk to the Chatham Islands.</p>	<p>Add</p> <p>2.1.3 Chatham Islands Pest Management Strategy</p> <p>ECan will prepare a pathway management plan in partnership with the Christchurch Airport. In the interim, and as part of implementing such a plan, staff at Wellington, Christchurch and Chatham Island Airports will be trained to ensure inspection and enforcement of surveillance pests</p>
8	2.2.5	Amend	Outline the roles and responsibilities of the Department of Conservation as the lead agency for the containment of pest fish except Koi carp.	<p>Add</p> <p>2.2.6 Freshwater Fisheries Regulations 1983</p> <p>The Department of Conservation is the lead agency for noxious fish. For the purposes of the Strategy, ECan has agreed to be the lead agency for Koi carp.</p>
13	3.3.4	Support in part Amend	<p>Formed road reserves and rails are a pathways.</p> <p>Christchurch City Council has yet to develop policy or to undertake pest management as part of road reserve management. We would be pleased to work with ECan in developing this.</p>	<p>After Table 2 and the associated note:</p> <p>Add</p> <p>3.3.4 Rail and formed road reserves</p> <p>Add after Table 2 and associated note</p> <p>3.3.5 Rail</p> <p>Road and formed road reserves are pathways/vectors for disease and pests.</p> <p>ECan will develop guidelines for District Councils for the management of pests on road reserves as part of scoping Pathway development plans for formed road reserves.</p> <p>For the purposes of the Act....expectations.</p>
13	3.3.5	Amend	The major pathways into and out of Christchurch are the main highways and Christchurch airport. The CPMF needs to state how partnerships between ECan and Land Transport New Zealand or the Christchurch airport or major supply chains will be formed. Once this is identified, the Christchurch City Council will be better placed to be able to scope the support that could be provided for surveillance of pest control on roadways. We suggest that large freight companies, for example, be required through rules to provide evidence of surveillance for not in region exclusion pests.	See above
37	6.4	Support in part	The maps in the Appendices give clarity as to where	A number of pests that are well established.....in Table 14

		Amend	ECan will be providing regulatory support to landowners, and a clear rationale for regional and landowner cost analysis. Maps outlining where high value areas are to the region would provide similar certainty to ECan, the regional community and land occupiers as to where financial and/or regulatory support might be expected.	below. ADD ECan will identify areas of high value to the region as part of implementing “A Biodiversity Strategy for the Canterbury region” or its successor, and give priority to protecting these areas through the sustained control programme.
20	5.5 Pest management liaison committees	Support in part Amend	How the effectiveness of the Pest Management Liaison Committees can be improved needs to be outlined.	After paragraph 1 which states: Pest management liaison committees havecommunities. Add The committees have been (statement on effectiveness) in achieving coordinated control through targeted rates for widespread pests for a range of values. Advice on implementation....etc. The effectiveness of the committees have been reviewed to ensure its representation is aligned with the values and impacts outlined in S32 of the Biosecurity Act.
54	Table 24	Support in part Amend		Add Plan Rule 6.4.16 Exemptions to the Good Neighbour Rule for gorse and broom will be provided for the life of the plan where sites of environmental value to the region have been identified. Explanation of rule Gorse and broom can act as a nursery crop fixing nitrogen and providing shelter, for regenerating native species and erosion control. Exemptions to the rule will cater for case by case applications to keep gorse and broom for environmental protection. For crown land which will be managed for biodiversity values in perpetuity and pastoral productivity values will not be required in future, an exemption may be granted in that the boundary rules will stand, but the management of gorse and broom within the property will be exempt.
62		Support in part Amend	The Council, DoC and ECan have worked in partnership for many years reducing the extent of feral goats on Banks Peninsula and the Port Hills to protect range of values. We note the Department of Conservation is the lead agency under the Wild Animal Control Act 1977, but we suggest that ECan adds another tool to the methods used to prevent domestic goat escapes through a rule or a good neighbour rule.	Add to Table 29 Feral goats <i>Capra hircus</i> Map: Add a map of Banks Peninsula and the Port Hills to Appendix 3. Add to Table 30 Description of adverse effects Add description from page 58 of the Canterbury Pest Management Strategy 2011-2015

			<p>Feral goats are site-led within the Canterbury Regional Pest Management Strategy 2011-2015 and should remain site-led pests.</p> <p>We suggest that a rule either requires that domestic goats are marked and/or fences are maintained.</p> <p>Alternatives considered Full service delivery across the whole of the region is not considered feasible. Banks Peninsula and the Port Hills have high biodiversity values, and feral goats are in restricted distributions.</p> <p>Past experience has shown that relying on individual voluntary action is not effective in achieving plan objectives.</p>	<p>Add to Table 31 Plan objective 21 For the site of Banks Peninsula and the Port Hills listed in Appendix 3, sustainably control feral goats to ensure population levels do not exceed 20 per ha in order to minimize adverse effects on environmental values on Banks Peninsula and the Port Hills.</p> <p>Principal measures to be used Regulation to support the Department of Conservation under the Wild Animal Control Act.</p> <p>Plan rule 6.4.13 An occupier within the Christchurch District shall, upon receipt of a written direction from an Authorised person, ensure that fences are maintained to contain domestic goats.</p> <p>AND/OR Plan rule 6.4.14 An occupier within the Christchurch District shall, upon receipt of a written direction from an Authorised person, ensure that domestic goats have an ear tag visible from 20m or more.</p> <p>The requirement to act, service delivery and a rule described in S 53 of the proposal will be used to achieve Plan Objective 21.</p>
	Table 26	Amend	<p>It is possible to eradicate Old Man's Beard and to restrict its range. The Auckland Council, for example, provided incentives for residents of the Waitakere ranges, and has successfully reduced the population to zero densities. Support provided included advocacy and the provision of free, convenient pest plant waste disposal. We therefore disagree that there are no alternative measures that provide for satisfactory inspection, education or advocacy. While it is true that relying on voluntary action to minimize adverse impacts from Old Man's beard would not be effective due to inadequate incentives, increasing incentives has been shown to be effective. We submit that ECan trial for a period of 5 years a programme similar to that adopted by the Auckland Council on Banks Peninsula. We believe that advocacy and incentives focused on pests that are easily identified, and for which the community has access to control methods will empower individuals to take collective action, and support local community</p>	<p>Plan Objective 16 On Banks Peninsula, conduct a 5 year trial through advocacy and incentives to eradicate Old Man's Beard.</p>

			leadership.	
61	Table 29	Support in part Amend	The CRPMP, in general, has a focus on terrestrial pests and has few freshwater or marine pests. The Council, DoC and ECan have worked in partnership for many years reducing the extent of <i>Lagarosiphon major</i> over the entire site of the Christchurch Plains to protect a range of values. Long term, the range of <i>Lagarosiphon</i> can be reduced by eradicating it from the Christchurch Plains. There is potential for <i>Lagarosiphon</i> to spread from the Groynes.	<p>Add to Table 29. <i>Lagarosiphon major</i></p> <p>Add to Table 30 Description of adverse effects Add description from page 75 of the Canterbury Pest Management Strategy 2011-2015</p> <p>Add to Table 31 Plan Objective 19 For each site..... V Wild Thyme VI <i>Lagarosiphon major</i> to avoid,mitigate....being reduced by 50% (vii) extent of <i>Lagarosiphon major</i> being maintained within its 2011 distribution</p> <p>Add Appendix 5 of the Canterbury Pest Management Strategy 2011-2015 of the Christchurch Plains to Appendix 3 of the CRPMP</p> <p>Principal measure to be used. ECan will take a lead role in bringing about the desired levels of environmental protection on the Christchurch Plains.</p> <p>The requirement to act, service delivery and a rule described in S 53 of the proposal will be used to achieve Plan Objective 2</p>
66	Table 29	Amend	The Council, DoC and ECan have worked in partnership for many years reducing the extent of feral pigs over the entire site of Banks Peninsula and the Port Hills to protect a range of values. Pigs are in a restricted distribution and can be maintained at low densities.	<p>Add to Table 29. Feral pig, <i>Sus scrofa</i></p> <p>Add to Table 30 Description of adverse effects Add description from page 60 of the Canterbury Pest Management Strategy 2011-2015</p> <p>Add to Table 31 Plan Objective 20 For each site....(iv) possum (v) extent of feral pig on Banks Peninsula being maintained within its 2011 distribution.</p> <p>Principal measure to be used. ECan will take a lead role in bringing about the desired levels of environmental protection on Kaituna Valley on Banks Peninsula.</p>

				<p>Add to Appendix Appendix Feral Pig</p> 
81	9.3.1	Support Amend	<p>Section 76(1)(j) and (k) of the Biosecurity Act 1993 requires that a proposal for a pest management plan must specify what the effects of implementation of the CRMP are likely to be, with respect to the following matters: the relationship of Maori and their culture and traditions with their ancestral lands, waters, sites, waahi tapu and taonga.</p>	<p>9.3.1 Effects on Maori The Plan is expected to have overall beneficial effects for Maori culture and traditions the relationship of Maori and their culture and traditions with their ancestral lands, waters, sites, waahi tapu and taonga.</p>
102	Appendix 2	Amend	<p>We assume that the purpose of including organisms of interest is because they could form the basis of site-led programmes outside of the Strategy. If this is the case, it needs to be stated. If not, the purpose of listing these pests needs to be stated.</p>	<p>Add after Appendix 2, Organisms of Interest The purpose of listing organisms of interest is to clarify which pests could form the basis of site-led programmes outside of the Strategy. OR The purpose of listing organisms of interest is to (and state rationale)</p>
102	Appendix 2	Amend	<p>We assume that the purpose of including organisms of interest is because they could form the basis of site-led programmes outside of the Strategy. If so, add the following species as organisms of interest. Species are listed in order of priority.</p> <p><i>Lagarosiphon</i> is an unwanted organism and can be contained (see above).</p>	<p>Add the following species to Appendix 2: Sea lavender, Giant hogweed, Spur valerian, Yellow flag, Sweet reed grass, Climbing asparagus, Smilax, Grey willow, Japanese honeysuckle, Pampas, Fennel, Wallflower, Mayten, Mouse-ear hawkweed, Nodding thistle, Tasmanian blackwood, Pride of Madeira, Pigs ear.</p> <p>Remove the following species to Appendix 2: <i>Lagarosiphon</i></p>

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