

From: New Zealand Beekeeping
To: [Pest Review](#)
Cc: [New Zealand Beekeeping](#)
Subject: Proposal for the Canterbury Regional Pest Management Plan 2017 - 2037
Date: Monday, 3 July 2017 4:56:59 PM
Attachments: [ECAN Proposal for the Canterbury Regional Pest Management Plan 2017-2037.pdf](#)

3rd July 2017

Proposal for the Canterbury Regional Pest Management Plan
P O Box 345
Christchurch 8140

Email: pestreview@ecan.govt.nz

Dear Sir,

Re: Proposal Canterbury Regional Pest Management Plan 2017- 2037

Please see attached Submission from New Zealand Beekeeping Incorporated.

We wish to be heard in support of our Submission.

Thank you

Linda Bray

Secretary

New Zealand Beekeeping Incorporated

Email: info@nzbeekeeping.co.nz

Phone-Fax 03 308 4964

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

3rd July 2017

Proposal for the Canterbury Regional Pest Management Plan
P O Box 345
Christchurch 8140

Email: pestreview@ecan.govt.nz

Dear Sir,

Re: Proposal Canterbury Regional Pest Management Plan 2017- 2037

On behalf of the members of New Zealand Beekeeping Inc., we submit many of the plant species that have been declared as pests are considered as beneficial plants by our members for sustainable beekeeping.

We would be remiss in representing the interests of beekeepers if we did not point out to the regulators these plants provide the food sources, nectar and pollen that are essential for the sustenance of our honey bees.

Years of removal of gorse hedges and the control of gorse and broom from areas unsuitable for development have had an effect on the sustainability of beehives in the Canterbury region.

We do not have reliable evidence or impact reports relating to the removal of gorse and broom from our environment. However we can say, based on observations in retrospect, in the 1960-70's beekeepers did not fully appreciate the value of the traditional gorse fences that divided paddocks in the Canterbury farms as bees appeared to have sufficient pollen for their needs. As time has progressed, land use and attitudes changed, gorse hedges have been removed thus contributing to a decline of pollen sources in our environment. It has reached the stage where, in some cases, bees suffer from lack of pollen. Hives weaken and a downward spiral continues until the hive eventually dies or the beekeeper is forced to take some action to address the situation.

Whilst we would be reluctant to press for other species of plants to be 'declared as pests' (ryegrass, wheat, barley etc) we consider the control methods for gorse and broom, together with the desire to utilize land for growing farmed plants means that gorse and broom could no longer be considered as 'invasive' pests but maybe considered as plants with a purpose.

That purpose could be for animal control and shelter (important animal welfare issues) as well to provide food for many insect species. These plants provide protection for larger growing trees in a natural regeneration of native or exotic forests. Environment Canterbury has not identified any positive benefits from some of the plants considered pests. We wish to inform ECAN the positive benefit of having a sustainable bee population in the Canterbury region means that the crops farmers grow that need insect pollination will continue to be pollinated by local bees. The clover, small seed, and vegetable seed industry in Canterbury contributes to the economic wellbeing of the

community. A large portion of the bees' diet comes from plants, some consider as pest plants, without which bees would struggle to survive.

In conclusion it is not all bad that we have a range of plants in our environment each plant has its niche in the environment and is part of an ecosystem that provides for the lifeforms that have evolved today. As evolution continues plants and animals will appear or decline as the land and man provides.

We consider there is no need for gorse and broom to remain as plants that have been declared as pests. We do not support further regulatory controls being placed on gorse or broom.

I wish to be heard in support of our Submission.

Thank you for your consideration

Yours faithfully
Roger Bray
Executive Member

New Zealand Beekeeping Incorporated