

From: DAVIES REBECCA
To: [Pest Review](#)
Subject: RE: NZDF submission on Proposal for CRPMP [unclassified]
Date: Tuesday, 4 July 2017 4:49:51 PM
Attachments: [image002.png](#)
[NZDF submission on Proposal for CRPMP.pdf](#)

Hi there,

Apologies, please see NZDF's submission attached.

Regards

Rebecca Davies

Senior Environmental Officer (Planner)
Defence Estate and Infrastructure
NEW ZEALAND DEFENCE FORCE
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From: Pest Review [mailto:PestReview@ecan.govt.nz]
Sent: Tuesday, 4 July 2017 4:36 p.m.
To: DAVIES REBECCA
Subject: RE: NZDF submission on Proposal for CRPMP [unclassified]

Good afternoon Rebecca,

Thank you for your interest in the Proposal for the Canterbury Regional Pest Management Plan.

I think you may have forgotten to attach the submission document to your email yesterday.
Please send it in at your earliest convenience.

Kind regards,
Lochiel McKellar

From: DAVIES REBECCA [mailto:REBECCA.DAVIES@nzdf.mil.nz]
Sent: Monday, 3 July 2017 4:44 PM
To: Pest Review <PestReview@ecan.govt.nz>
Subject: NZDF submission on Proposal for CRPMP [unclassified]

Good afternoon,

Please find attached a submission by the New Zealand Defence Force in regard to the Proposal for the Canterbury Regional Pest Management Plan.


Regards,

Rebecca Davies

Senior Environmental Officer (Planner)
Defence Estate and Infrastructure
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Submission on the Proposal for the Canterbury Regional Pest Management Plan 2017-2037

To: Environment Canterbury Regional Council

By Email: pestreview@ecan.govt.nz

Submission by: New Zealand Defence Force
Contact Person: Stephen Phillipson, Senior Environmental Officer - Ecology

Address for Service: New Zealand Defence Force
Defence Estate and Infrastructure
National Service Centre
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Introduction

1. The New Zealand Defence Force (NZDF) has military interests throughout New Zealand. Defence facilities are key strategic infrastructure of national and regional importance, playing a significant role in both military training and civil and/or national defence operations.
2. NZDF occupies various facilities within the Canterbury region, including the West Melton Weapons Ranges, the Weedons Transmitter Facility, Glentunnel Depot, Burnham Army Camp and the Tekapo Military Training Area and Camp. NZDF carries out pest animal and plant programmes in these areas.
3. NZDF's submission on the proposed Canterbury Regional Pest Management Plan (CRPMP) is from the perspective of NZDF as an occupier wishing to protect and support pest animal and plant programmes it conducts, and also reflects the perspective, observations and experience of NZDF's biosecurity management staff in the region.
4. NZDF wishes to contribute to the achievement of the best overall management of pests in the Canterbury Region and throughout New Zealand and would welcome the opportunity to discuss these comments further with Environment Canterbury (ECan).

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

5. NZDF's submission, and support of or opposition to each matter addressed, is detailed on the attached sheet.

Decisions Sought from Council

6. The decisions sought from Council on each of the matters raised in this submission are detailed on the attached sheet.

Hearing

7. NZDF wishes **to be heard** in support of this submission.
8. If others make a similar submission, **NZDF will consider** presenting a joint case with them at the hearing.



Person authorised to sign
on behalf of New Zealand Defence Force

Date 03/07/17

Point	Provision	Support/ Oppose	Reasons	Decision sought
1	Table 16 (Bennett's wallaby) – Plan Objective 6	Support in part	What constitutes “establishment” of a population should be clarified to identify when control needs to be initiated or intensified by ECan over control undertaken by landowners, to deal with vagrant animals or animal groups. This is also important for monitoring purposes as “preventing the establishment of wallabies beyond the Containment Area” is an important performance measure.	Include clarification or a definition of what constitutes “establishment” of wallabies beyond the Containment Area.
2	Table 16 - Plan Rule 6.4.2	Support in part	“Reasonable steps” needs to be defined or clarified as this is subjective and requires defined and measurable attributes so there is clarity around obligations under the rule.	Include clarification or definition of ‘reasonable steps’.
3	Table 24, - Plan Rule 6.4.13, Plan Rule 6.4.15. and rules for Broom (Table 18):	Support in part	Streams and other waterways are notable pathways for the spread of broom and gorse and often cross property boundaries. Since the driver for the rule is to “... manage the spread ... to an adjacent occupier ...” up-stream properties should be compelled to control broom and gorse around the margins of waterways that cross boundaries as well as along fence-lines.	Amend to require up-stream properties to control broom and gorse around the margins of waterways that cross boundaries as well as along fence-lines.
4	Table 20 Plan Rule 6.4.8 (a)	Support in part	Chilean Needle Grass (CNG) under a boundary control rule of 10m has been known to spread to adjoining properties, therefore having a 5m boundary control zone in the proposed CRPMP will not achieve the objective of preventing the spread to nearby properties.	Amend Plan Rule 6.4.8 (a) to require the elimination of all Chilean Needle Grass plants within 20 metres of an adjoining property boundary.

Point	Provision	Support/ Oppose	Reasons	Decision sought
5	Table 20 Plan Rule 6.4.8. (b)	Support in part	<p>While matters for inclusion in the Chilean Needle Grass Written Management Agreement are identified in Plan Rule 6.4.8.1 (Definitions), the extent of obligations a 'party' will be subject to under the Agreement (e.g. legal, financial) are not clear.</p> <p>As drafted, this rule would be difficult to monitor and enforce.</p> <p>If the rule cannot be adequately enforced there seems little requirement for including it in the proposed CRPMP. In any event, for existing CNG infested properties, this rule could be covered under the CNG Written Management Agreement which could then be enforced through that agreement (under plan Rule 6.4.8).</p>	<p>Include clarification as to the extent of obligations a 'party' will be subject to under a Chilean Needle Grass Written Management Agreement.</p> <p>Delete this rule, and/or amend to include the prohibition of minimisation of movement of CNG seed beyond the relevant property boundary as a matter to be included in the CNG Written Management Agreement.</p>
6	Table 20 Plan Rule 6.4.9	Oppose in part	<p>Given the recent uncontrollable expansion of the wallaby population and how important it is to maintain the current distribution of wallaby, leaving this monitoring measure to casual reports from "... occupiers or other persons..." is an unreliable way to determine this. By the time most people notice a new established population it is likely to be well established, sizeable and probably more difficult and expensive to try and eliminate.</p> <p>The strategy and programme for controlling wallaby outlined under the existing RPMS appears to have been inadequate to achieve the objectives set for this pest in this document (Ensure Wallabies remain at or below level 3 in the containment and</p>	<p>A preferable solution in regard to monitoring is for ECan staff or contractors to be doing regular evaluations around the boundary of the containment area, particularly during periods when emigration from the established population is likely to occur. An example of this approach is the monitoring of Nassella tussock. In addition it would seem essential that notifying ECan on the sighting or presence of Wallaby outside of the containment area should become or remain a specific rule under the programme.</p> <p>The Wallaby programme within the Contained Area be split into two programmes: sustained control within the containment area and a</p>
7	7.1 Table 32 – Monitoring of Bennett's wallaby	Oppose in part		

Point	Provision	Support/ Oppose	Reasons	Decision sought
			<p>prevent the establishment of Wallabies outside of the Containment area). Aside from conforming to new programme titles required under the National Policy Direction, adding in a GNR and expanding the containment area, there appears to have been little change to the strategic approach or containment rules from the existing Canterbury Regional Pest Management Strategy. This indicates that the new programme is also unlikely to achieve its goals. Greater consideration should therefore be had in regard to the rules and actions governing this pest to achieve the objective.</p> <p>For those newly established populations, such as in the Mt Cook area, there should be strong rules in place to maximise control efforts and ensure they do not spread further. To stop the spread, it is important to know where the established pests are, which could be achieved through active monitoring of sites to provide an accurate measurement of the performance of the programme.</p>	<p>programme of Progressive Containment in the buffer zone.</p> <p>For those newly established populations, such as in the Mt Cook area, there should be strong rules in place to maximise control efforts and ensure they do not spread further.</p> <p>The function and management of the 'buffer zone' also needs to be addressed clearly with actions and rules placed around it to ensure that its objective can be achievable over the 10 year plan.</p>

