

**From:** Jennifer Miller  
**To:** [Pest Review](#)  
**Subject:** F&B Submission on proposed CRPMS  
**Date:** Wednesday, 5 July 2017 3:53:30 PM  
**Attachments:** [F&B Submission on proposed CRPMS.pdf](#)

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Please see **attached** a late submission on behalf of Forest and Bird on the proposed RPMS.

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*'The arc of the moral universe is long but it bends towards justice'* Martin Luther King



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3 July 2017

Environment Canterbury

**BY EMAIL**

**Proposed Regional Pest Management Strategy**

Please find enclosed the submission by the Royal Forest and Bird Protection Society of New Zealand Inc.

Please contact me in the first instance if you wish to discuss any of the matters raised in this submission.

Yours sincerely

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To: Canterbury Regional Council

From: Royal Forest and Bird Protection Society of New Zealand Inc  
(Forest and Bird)


**Address for service:**

Forest and Bird  
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**Attention:** Jen Miller

**INTRODUCTION**

1. Forest & Bird is New Zealand's largest non-governmental conservation organisation with many members and supporters. Forest & Bird originally set out to protect New Zealand's unique flora and fauna the tasks of Forest and Bird in more recent years has extended to protecting and maintaining the environment surrounding the flora and fauna. Establishing wildlife reserves, initiating protection campaigns and promoting general public awareness around what is happening in and around New Zealand is all central to Forest & Bird's establishing principle of flora and fauna protection.
2. Pests and weeds is a significant contributor to biodiversity loss in Canterbury which is why Forest and Bird volunteers spend many hundreds of hours each year trapping possums, rats, stoats etc., as well as removing plant pests such as wilding pines on public land and plant pests such as Russell and tree lupin in our important riverbeds. This work is often carried out in partnership with Environment Canterbury and local authorities within the region.
3. Forest and Bird `will be available to present on its submission.

Proposed Plan Provisions	Support/Oppose	Reasons	Decision Sought
4.1 Organisms declared as pests Table 3 and 6.4	Support in part	Sycamore <i>Acer pseudoplatanus</i> has become an increasing problem. Its spread in the Canterbury foothills has the potential in the near future to be of significant biodiversity concern. Sycamore can smother and out-compete native plants and is difficult to remove once established. It is Forest and Bird's view that within the life of the Strategy Sycamore will become a considerable pest and needs to be added to the pest organisms list. .	<b>Add</b> Sycamore to Table 3 and 6.4 – 'Pests to be managed under sustained control programme'.
4.1 Table 3 and 6. 5	Support in part	Tree Lupin – <i>Lupinus arboreus</i> : In the last 10 years there has been an alarming spread of Tree Lupin in lowland river beds throughout Canterbury and it is now appearing in the higher reaches of the alpine rivers, the Rakaia, and Rangitata.  Tree Lupin forms a large plant (2m x 2m) which is able to withstand the conditions on a shingle river bed where the substrate often moves, or may be inundated in a flood. Tolerates wind, salt, hot to cold, physical damage and grazing (not readily eaten), drought, low fertility (fixes nitrogen), fire. Intolerant of moderate shade and waterlogged soils. (NZPCN)	<b>Add</b> Tree Lupin – <i>Lupinus arboreus</i> -to <b>Table 3</b> and <b>6.5</b> for biodiversity protection, in particular to maintain suitable breeding habitat for threatened river bird species such as black billed gull, wrybill, black fronted tern, pied and black stilt and banded dotterel.

		<div data-bbox="846 231 1258 1173">The image block contains three vertically stacked photographs. The top photo shows a close-up of bright yellow lupine flowers on green foliage. The middle photo is a close-up of a brown, elongated seed pod with two dark seeds visible. The bottom photo shows a wide landscape of a dry, hilly area with patches of yellow lupine plants under a clear blue sky.</div>	
		<p>As well as physically smothering and precluding the growth of native plants that occur on the river bed and its verges, Tree Lupin changes the chemical composition of the soil it grows in by fixing nitrogen. This allows the growth of other weeds and the higher nitrogen levels change soil conditions to the detriment of native plants adapted to low</p>	

		<p>nitrogen levels.</p> <p>Tree Lupin in braided rivers contributes significantly to the stabilisation of islands within the river. This affects the natural movement of shingle, a vital feature of braided river ecosystems. Stable, weed covered islands provide cover for mammalian predators of the birds that nest on the rivers, and minimise the site selection options for bird species such as Black Billed Gulls, Black fronted Terns, Banded Dotterel, Wrybill, Pied Oystercatcher, Pied Stilt and Black Stilt.</p>	
<p><b>4.1 Table 3 and 6.5</b></p>	<p>Support in part</p>	<p>Wild Russell lupin <i>Lupinus polyphyllus</i> is listed as an OoL. Forest and Bird has advocated for Russell lupin to be managed as a pest for sometime and have been particularly concerned that it has been promoted as a fodder crop within highly sensitive environments such as the Mackenzie Basin and in the upper Ashburton catchment.</p> <p>The rationale for them only being included on the OoL list is not clear. ECan has been made aware of this considerable threat to biodiversity so it is disappointing to Forest and Bird that it is not being adequately considered in the proposed strategy.</p> <p>The species is able to grow and mature very quickly and can rapidly invade shingly river systems. It provides hiding places for predators of the (mostly highly endangered) birds that would usually nest safely on these bare islands. The dense infestations also interfere with water flow along these rivers, changing the ecosystem for the birds that live</p>	<p><b>Add</b> Russell lupin to <b>Table 3</b> and <b>6.5</b> for biodiversity protection, in particular to maintain suitable breeding habitat for threatened river bird species such as black billed gull, wrybill, black fronted tern, pied and black stilt and banded dotterel.</p>

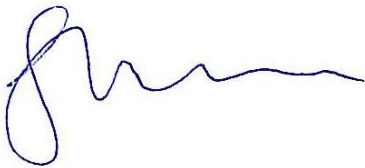
		<p>there. It produces large amounts of seed that are spread mainly by water, and also by humans distributing them along roadsides.</p> <p>Russell lupin is removed by DOC and others at considerable cost. As currently managed there is no ability to prevent spread by landowners.</p>	
<b>4.2 and Appendix 2</b>	Support	Other than the concern that Wild Russell lupin is not being considered a pest organism the Ool is supported. The ability to be able to review the Plan if future control for species on the list is required is also supported.	<b>Retain as worded</b>
<b>5.5 Pest management liaison committees</b>	Support in part	<p>This section acknowledges the value of the work of these committees and seeks to continue to 'work with stakeholders and communities'.</p> <p>However it is vaguely worded. It would appear that the only opportunity for some significant stakeholder interests to assist the committee and Council is by invite, i.e. being co-opted on. For example Iwi, DOC and conservation groups such as Forest and Bird.</p> <p>Given the amount of pest work done by the latter two their absence, if not co-opted would seem a missed opportunity to improve collective approaches to pest management.</p>	<p><b>Reword:</b></p> <p><b>5.5</b> to ensure there is a clear path to committee membership for stakeholders with a significant interest in pest work, other than rural ratepayers such as a designated place for DOC, Iwi and groups like Forest and Bird. An other option might be the provision of the opportunity for groups to be invited to apply to be members of a committee</p>
<b>6.1 Table 5</b>	Support in part	<p>Myrtle rust (<i>Austropuccinia psidii</i>) has been found in Northland, Waikato, Bay of Plenty and Taranaki.</p> <p>Given that it would appear to be case that the fungus is able to be carried by strong winds and the likelihood of increased significant weather events capable of carrying the spore it would seem prudent to add myrtle rust to Table 5.</p>	<p><b>Add</b></p> <p><b>Myrtle rust -<i>Austropuccinia psidii</i> -to 6.1 Table 5</b></p>
<b>Table 7 Plan Objective</b>	Support		<b>Retain Table 7</b>

<b>6.3 Table 11</b>	Support in part	It is not clear why <i>Pinus radiata</i> and Douglas fir have been excluded from the wilding trees listed in the Table. As described below both species present a considerable wilding problem	<b>Add to Table 11</b> <i>Pinus radiata</i> and Douglas fir- <i>Psudotsuga menziesii</i>
<b>Plan Rule 6.3.2</b>	Oppose	<p>Wilding seed source from private land.</p> <p>The Ashburton Lakes area is virtually wilding free thanks to many hours of work weeding by volunteers. While this work is recognised by ECan and other agencies it is often described in terms of volunteers "enjoying days out doing wilding work"</p> <p>This does not acknowledge both the organisation and considerable effort required to carry out wilding clearance, nor does it acknowledge the wider public's serious concern about the lack of action to control wilding seeding and spread.</p> <p>By way of an example Each main wilding area in the Ashburton Lakes that the Ashburton branch of Forest &amp; Bird has been working in is connected to adjoining shelterbelts or amenity planting on nearby private land. These trees include <i>Pinus radiata</i> and Douglas fir neither of which are included in the list of problem plants. Their wilding spread must be monitored and managed too. Both original seed sources are 200 metres away from the adjoining property and spread far beyond that.</p> <p>Elsewhere on the adjoining properties where there are single mature seeding trees on higher slopes, seeds can be windblown far beyond 200 metres and in the case of Douglas fir up to 127 km. There needs to be rules in place to control them.</p>	<b>Reconsider Rule 6.3.2</b> according to the species and their ability to spread. As currently worded the rule is not fit for purpose and in Forest & Bird's view will not adequately control the significant biodiversity



		<p>Around the Ashburton Lakes and other similar areas the wilding problem may appear minor and manageable and not a priority. Forest and Bird believes there must be a policy to prevent wildings foremost rather than a wait and see and deal with it later philosophy. It is more cost effective to first prevent seedlings and then deal with any small populations of trees as soon as possible. This type of work can be carried out by volunteer groups.</p>	
<p><b>Bennetts wallaby</b> <b>Table 16</b></p>	<p>Support in part</p>	<p>F&amp;B are extremely concerned by the documented increase in the wallaby range both within and beyond the containment area. Members familiar with the area, who include keen wallaby hunters, are also concerned at the high wallaby numbers within parts of their current range and the significant damage they are causing.</p> <p>F&amp;B supports the Bennett's wallaby Objective, Principle Measures and Rules as proposed but wish to put on record concerns about implementation.</p> <p>The natural boundaries of the containment area are as, or more, defensible than any beyond. If containment here fails in time wallaby range in the whole of the South Island will be determined by habitat suitability rather than control efforts. This plan and planning period are the last chance to protect the environmental values of very large areas of wallaby suitable habitat. It is also the last chance to prevent escalation of economic loss to farming and greatly increased costs of ongoing control should we fail in containment.</p>	<p><b>Retain</b></p>

		<p>Forest &amp; Bird are also concerned by increased wallaby numbers and damage in parts of the current wallaby range within the containment area.</p> <p>It is Forest &amp; Bird's view that there significant ground lost in terms of both range containment and control of numbers within their range since the disbanding of the Wallaby Control Board. The new legislative framework and/or the implementation of the current RPMS have failed. Within and constrained by this new legislative framework the wallaby provisions proposed for the RPMP seem fit for purpose and as stated we support them. Implementation is the challenge, in particular achieving the landowner and stakeholder co-operation required to achieve the essential co-ordination of control operations across land boundaries.</p>	
<b>Table 17</b> <b>Rule 6.4.2</b>	Oppose	The purpose of this rule is unclear as it would appear Rule 6.4.1 applies to all landowners, as it should do in F&B's view.	<b>Clarify</b> under 'Explanation of rule' the purpose of the rule as opposed to Rule 6.4.1.



**Jen Miller**  
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