

To: Environment Canterbury
PO Box 345
Christchurch 8140

Name of submitter: Otago Regional Council

This is a submission on: Proposed Canterbury Regional Pest Management Plan 2017-2037

The specific parts of the plan that this submission relates to are:

- Regional level objectives
- Bennett's Wallaby provisions

This submission is:

The Otago Regional Council (ORC) supports in principle the Proposed RPMP.

The Otago Regional Council seeks the following from Environment Canterbury:

Prior to a decision on the proposed plan change, Environment Canterbury (ECan) determines:

1. The wider environmental outcomes, including biodiversity outcomes, to be achieved by the plan as well as assisting in achieving consistent pan-regional strategies; and
2. Listing Wallaby inside the containment zone under containment zone (6.3); and
3. Defining 'established' in relation to Wallaby outside the containment zone (6.2), how this number will be measured, and map wallaby already known to be outside of the containment zone.

ORC would like to be heard in support of its submission.



Peter Bodeker
Chief Executive

Address for service: Otago Regional Council
Private Bag 1954
DUNEDIN 9054

Telephone: 03 474 0827

Fax: 03 479 0015

Telephone: 03 474 0827

Fax: 03 479 0015

Email: warren.hanley@orc.govt.nz

Contact person: Warren Hanley, Resource Planner – Liaison

Our Reference: A1025564

Discussion

1. Background

ORC Otago Regional Council (ORC) staff appreciate the opportunity to comment on the Proposed Canterbury Regional Pest Management Plan (RPMP).

ORC is generally satisfied with the Proposed RPMP, but would like to advocate for the addition of two important matters it considers are not identified in proposed RPMP;

- identification of wider environmental outcomes, including biodiversity outcomes that pest management approaches set out in the plan are intended to achieve; and
- development of provision for the Bennett's Wallaby which poses an ongoing threat of continued spread and establishment into the Otago Region.

2. Pan Regional Objectives

The effective management of some pest requires a pan-regional approach. ORC is interested in discussing with ECan how a collaborative approach would benefit both our regions. To make such an approach work, our councils would need to be able to identify where we seek common desired outcomes and where we do not.

Clearly identifying in the proposed PRMP how pest management fits with desired outcomes for biodiversity (in the case of the ECan Biodiversity Strategy), and with ECan's larger planning framework would benefit pan-regional efforts to help identify issues where ORC and ECan can work together to implement shared strategies for common objectives.

Strategic level objectives and policies to guide ORC's approach to pest management are addressed as follows in its notified proposed regional policy statement;

Objective 3.1:

The values of Otago's natural resources are recognised, maintained and enhanced

Policy 3.1.9:

Ecosystems and indigenous biological diversity

Manage ecosystems and indigenous biological diversity in terrestrial, freshwater and marine environments to achieve all of the following:

- a) Maintain or enhance ecosystem health and indigenous biological diversity;
- b) Maintain or enhance biological diversity where the presence of exotic flora and fauna supports indigenous biological diversity;
- c) Maintain or enhance areas of predominantly indigenous vegetation;
- d) Recognise and provide for important hydrological services, including the services provided by tussock grassland;
- e) Recognise and provide for natural resources and processes that support indigenous biological diversity;
- f) Maintain or enhance habitats of indigenous species and the habitat of trout and salmon that are important for recreational, commercial, cultural or customary purposes;
- g) Control the adverse effects of pest species, prevent their introduction and reduce their spread.

Objective 3.2

Otago's significant and highly-valued natural resources are identified, and protected or enhanced

Policy 3.2.2

Protect and enhance areas of significant indigenous vegetation and significant habitats of indigenous fauna, by all of the following:

- a) Avoiding adverse effects on those values which contribute to the area or habitat being significant;
- b) Avoiding significant adverse effects on other values of the area or habitat;
- c) Remedying when other adverse effects cannot be avoided;
- d) Mitigating when other adverse effects cannot be avoided or remedied;

- e) Encouraging enhancement of those areas and values which contribute to the area or habitat being significant;
- f) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread.

3. Bennett's Wallaby Otago Overview

Wallaby are not known to be established in the Otago region and preventing their establishment is considered to be of benefit. Incidents of Bennett's Wallaby in Otago have increased over the past two years posing a very serious threat. The ORC and its Pest Management Strategy is committed to ensuring wallabies do not establish breeding populations within the Otago Region.

ORC would like to thank Environment Canterbury for its commitment in working alongside ORC staff and supporting ORC and its current Otago wallaby project. The challenges presented by Bennett's Wallaby in the region are well understood.

ORC agrees in principle with the objectives and rules for Bennett's Wallaby set out in the draft. Through this consultation we would like to take this opportunity to offer suggestions that would further protect the Otago Region from Bennett's Wallabies.

4. Proposed RPMP Bennett's Wallaby Provisions (6.4 – sustained control programme)

ORC position is that the aim to hold populations within properties at current levels will not be sufficient in protecting Otago from the spread of wallabies and propose that listings are changed.

The current increase of wallaby in Otago is linked to natural migration from the ECan containment zone, natural migration from the breeding wallaby population outside of the containment zone and human assisted movement. It is ORC's view that all these things are attributed to the current levels in and outside of the containment zone.

Rules and objectives for Bennett's Wallaby in the plan should be split into two separate categories; the issue of wallaby already established outside of the containment zone is a different issue from wallaby within the containment zone.

We make the following suggestion for listing Bennett's Wallaby in the plan:

5. Wallaby Within the Containment Zone (6.3 – Progressive containment)

Annual reports received from ECan staff clearly state that the user pays system adopted by farmers in 1992 has not worked and that the wallaby numbers have continued to increase, relying on occupiers to undertake coordinated control to prevent adverse impacts of wallaby has not been successful. ORC fears that the 6.4 sustained control approach will lead to a continued increase of populations.

Listing wallaby inside the containment zone separately under 6.3 would have the following benefits

- Continually relieve pressure from the containment zone boundaries.
- Reduce costs to stake holders and the environment within the containment zone.
- Reduce public access to wallabies and human assisted movement.
- Support the wallabies unwanted organism status.

This could best be achieved through coordinated wallaby control by an ECan approved body with significant funding from Department of conservation, Land Information New Zealand, Environment Canterbury, Land Owners and The Ministry of Primary Industries as is proposed for dealing with wilding conifers.

6. Wallaby established outside of the containment zone 6.2 Pests to be managed under an eradication programme.

ORC support plan objective 6(ii) preclude the establishment of Bennetts wallaby populations in the Canterbury region outside of the wallaby containment area. However, this objective is not supported by a definition of the word "established" and does not mention the populations already in Canterbury outside of the containment zone.

ORC requests the following:

- The plan should include the definition of “established” and how it is to be measured
- Wallaby already known to be outside of the containment zone should be included in the map appendix and be listed separately under 6.2 in the plan

Rules

ORC agrees with the rules set out in the draft plan however we submit that additional rules should be included.

- Any person outside of the containment zone shown on map 2 appendix 3 shall report wallabies seen, destroyed and any sign identified shall be reported to ECan within two working days.
- ECan will keep a record of all reports of wallabies seen, destroyed and sign identified outside of the containment zone and make this information available to other regions

ORC appreciates ECan allowing this submission after the official closing date. ORC believes it is important both Councils work together on mutual pan-regional pest matters.