

## Appendix 1

# Summary of Submissions and Staff Recommendations Report

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# Proposed Regional Pest Management Plan

## Summary of Submissions and Staff Recommendations

<b>General Comments</b>					
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Staff Recommendation</b>	<b>Reasons</b>
1.1	Bielski, Peter	No to Aerial 1080 or brodificom poisons, period.	Oppose  Oppose use of Aerial 1080 or brodificom poisons.	Note	The council uses best practice to minimise non-target effects from the use of animal pesticides.
2.1	Seymour, Paul	I vehemently object to the general term 'PESTS'. One man's pest is another man's pet.	Oppose  Delete reference to "pests" in the RPMP	Reject	The Biosecurity Act 1993 requires use of the term 'pest'
2.2	Seymour, Paul	Containment Animal Pests  What is actually meant by 'containment'? Does it mean entrapment and release somewhere else or incarceration, or does it mean somehow fencing off certain areas. Cats, rabbits, stoats, etc are almost impossible to keep fenced in or out, so I'm curious how this is dealt with. And how do you contain insects like wasps? As you probably can't answer people individually, I'd just like to suggest, again, that humane methods always be employed.	Insert provisions to ensure that humane methods always be employed.	Note	See submission point 2.4

2.3	Seymour, Paul	On a separate issue: I've been told that baby geese and ducks are often taken from their mothers to 'keep numbers down', which is absolutely abhorrent, since it goes against the very nature and prime directive of life. Also, a council worker (who confessed to being a hunter) said that it's common policy to 'thin out' flocks of wild birds 'for their own good'. It's not much good for the ones who die in pain. Just something to think about.	No decision requested.	Note	Background comment with no specific decision requested.
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2.4	Seymour, Paul	<p>It's unfortunate that certain species have been introduced into environments they were not suited to, but this is hardly the individual animals' fault. All animals, native and introduced, have an equal right to life and a gung-ho approach to culling has often proved disastrous. Let's face it, the term eradication is just another way of saying 'murder'.</p> <p>If rooks are a danger to native wildlife then I suggest humane methods of diminishing their numbers be employed - sterilisation programs for instance or re-locating them to lesser impact areas.</p> <p>What is actually meant by 'containment'? Does it mean entrapment and release somewhere else or incarceration, or does it mean somehow fencing off certain areas. Cats, rabbits, stoats, etc are almost impossible to keep fenced in or out, so I'm curious how this is dealt with. And how do you contain insects like wasps? As you probably can't answer people individually, I'd just like to suggest, again, that humane methods always be employed.</p>	<p>Oppose</p> <p>Insert provisions for humane methods of diminishing their numbers - sterilisation programs for instance or re-locating them to lesser impact areas.</p>	Reject	The council follows best practice for pest management control.
3.1	Browne, Geoff	<p>Bring back the Control Board.</p> <p>Provide incentives for citizens to help eradicate pest species by trapping and shooting</p>	<p>Oppose</p> <p>Insert provision to bring back the Control Board and provide incentives for citizens to help eradicate pest species.</p>	Note	Re-establishment of Control Boards is outside of the scope of the RPMP. In regards to incentives, the Service Delivery description in section 5.3.3 (c) notes that control tools may be provided.

6.4	Ross, Fraser Bell	<p>Darwin's Barberry - understand that this pest plant is subject to the Biosecurity Act sections 52 and 53 and there are bans on the movement, release and spread of this plant, nor cannot it be sold, propagated or multiplied. And that Environment Canterbury will be responsible for the advocacy, education, surveillance, and that the Regional Council will provide inspections. All these measures are fully supported especially for plant nurseries and the like. A biological control organism is now available for such control and ask that the Regional Council advocate for its use locally.</p>	<p>Support in part</p> <p>Advocate for the use of biological control organism for Darwin's Barberry.</p>	Note	<p>The relief sought is outside the scope of the RPMP. However, the council participates in the BioControl Collective (run by Landcare Research) and are interested to investigate possible biological control for this pest. Details of the Biological control programme are not detailed in the PRPMP as they are part of our wider Biosecurity programme.</p>
6.14	Ross, Fraser Bell	<p>there should be much better education, communication and advice given right across the broad spectrum of our community. In the past Environment Canterbury was very proactive with raising awareness of pests, not only to landowners but also to people in the urban communities. Such awareness raising needs to be recommenced urgently.</p>	<p>Ensure that awareness of pests across the broad spectrum of the community recommences urgently</p>	Note	<p>Staff considers that general awareness programmes are out of the scope of the RPMP.</p>
6.16	Ross, Fraser Bell	<p>Himalayan honeysuckle is fairly widespread in bush areas locally and again biological control methods should be sought;</p>	<p>Insert provisions to control Himalayan honeysuckle using biological control methods</p>	Reject	<p>Himalayan honeysuckle is currently listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. The council participates in the BioControl Collective (run by Landcare Research) and will follow any developments for a biological control for this organism. Biological control sits outside the RPMP, and is part of the council's wider biosecurity programme.</p>

6.21	Ross, Fraser Bell	NGOs and individuals undertake weed and pest control not only on the land they own or helps to manage but also on public and private land as well. Many hours of effort are made controlling weeds, such as broom, in areas where there are vulnerable native species, and within important stands of native forests here in South Canterbury.	No specific decision requested.	Note	
6.25	Ross, Fraser Bell	There should not be any less regulation of pests within property boundaries. However, there should be a more co-operative approach between neighbours and other organisations with land based responsibilities especially the Dept of Conservation, the Regional Council, Linz and the local District Councils.	No specific decision requested.	Accept	Staff acknowledge this point, and note that we are currently working cooperatively with occupiers, Crown agencies and other organisations, and will continue to develop these relationships.
6.26	Ross, Fraser Bell	Research: there should be ongoing research undertaken to find control agents to reduce or eliminate persistent weeds such as chilean flame creeper and old mans beard. Such research could be undertaken by other agencies with Government funding grants as the benefits could be more widespread then just for the Canterbury Region.	Provide for ongoing research into control agents	Note	This is outside the scope of the RPMP. Refer to submission point 6.16

8.1	Heale, Toby	<p>Pests need an environment in which to thrive. We face undoubted global warming that will bring different pests and diseases. We must not court those outbreaks by retaining or creating environments in which they will, or might, thrive. There has been activist demand for wetlands in the city. Whatever reasons are used to justify or promote them I think that they will, in the near future, be regarded as disease infested swamps and council employees will be sent to cover the water surface with diesel oil. (the preferred method of killing the pupae of flying insects such as mosquitoes). The city is not the place for wetlands. Furthermore, to promote the establishment of wetlands the level of the water table has been raised in some parts of the city. An aspect of global warming is more violent weather and we need better, not worse, drainage.</p>	<p>Ensure that wetlands are not established in the city</p>	<p>Reject</p>	<p>It is outside of the scope of the PRPMP to prevent the establishment of wetlands.</p>
11.1	Alderman, Sue	<p>I am against the use of 1080 poison in our forested areas. This is an inhumane death for the birds and animals that ingest it and we have laws in our country against cruelty to animals. I am also against the use of chemical weedkillers in our parks and grass verges and any green area used by humans and animals. My dogs skin was burned by grass that had been sprayed by the sand dunes.</p>	<p>Oppose</p> <p>Insert provisions to prevent the use of 1080 poison in forested areas and chemical weedkillers in parks, grass verges and any green area used by humans and animals.</p>	<p>Reject</p>	<p>To ensure effective implementation of the objectives in the RPMP, the council follows best practice for pest management control.</p>

12.1	McNeill, Steve	<p>The current delivery of pest management in Canterbury is currently failing on several fronts.</p> <p>a) Responsibility for pest control. (ii) Territorial authorities should take full responsibility for all formed ie sealed and unsealed legal roads (clause 3.3.4, Table 2) as it is their land to control</p>	<p>Oppose</p> <p>Amend provision 3.3.4, Table 2 to state that territorial authorities should take full responsibility for all formed ie sealed and unsealed legal roads</p>	Reject	<p>We note that a consistent approach for road reserve pest management would be ideal, but the consultation undertaken with territorial authorities indicated preference to retain the provisions from the existing Regional Pest Management Strategy.</p>
12.5	McNeill, Steve	<p>d) Control methods authorised/used. (i) I do not favour the indiscriminate use of poisoned grain for pest control as it is non-specific and kills non-target species. A Press article (13 June 2017) highlights the unexplained deaths of gulls. It could be that farm use of poisoned grain for Canada Geese control has resulted in the death of native gulls.</p>	<p>Oppose</p> <p>Insert provisions to limit the indiscriminate use of poisoned grain for pest control as it is non-specific and kills non-target species.</p>	Reject	<p>To ensure effective implementation of the objectives in the RPMP, the council follows best practice for pest management control.</p>
15.1	Banks Pensinula Marine Farmers Group - Alison Undorf-Lay	<p>The Banks Peninsula Marine Farmers Group represents marine aquaculture growers in Canterbury. The group sits under the umbrella of Aquaculture New Zealand, and meets regularly. Many of the growers in our group are land based farmers, who are aware of the role and functions of Regional Pest Liaison Committees. While we currently do not see a need to set up a specific CMA Pest Liaison Committee, it may become desirable in the future. If for example there is an marine plant or animal pest incursion.</p>	<p>Consider provisions in the RPMP to enable the opportunity for such a group be flagged in the RPMP and set up, if required.</p>	Note	<p>Staff welcome this suggestion, this does not require to be detailed in the RPMP, as the Pest Management Liaison Committees are managed in the council's wider Biosecurity programme.</p>

18.2	Frank, Hermann	The Plan covers a long period of time, so a review period of 10 years is supported. Also, if particular problems arise during that period, there should be the possibility to address those.	Insert provisions to review problems during the 10 year review period	Note	There is the ability to make minor changes prior to the 10 year period, including adding new site-led programmes.
18.3	Frank, Hermann	In the past, in many situations, ECan seem to only respond when they receive reports made to them, from the general public or environmental organisations. They should be much more pro-active with regards to the monitoring of both animal and plant pest species.	Ensure the monitoring of both animal and plant pest species is much more proactive.	Note	The council has a range of monitoring techniques, through reports from the community, through inspection of pests, active surveillance and pest trend monitoring.
18.4	Frank, Hermann	Also, I would briefly comment on the format of the Plan. I found it very difficult to work through it as there is so much detail on some of the pages. It makes it hard to find the relevant information. The photos and detailed data and methods of controlling for particular species is welcome, but I would suggest to put this in an appendix.	Amend the RPMP to put photos and detailed data and methods for controlling particular species in an appendix	Reject	The final RPMP is proposed to contain less content (as permitted by the Biosecurity Act). However, other comments have been received in support of the photos, and staff recommend these remain in the pest descriptions, as this may assist the public with pest identification.
18.5	Frank, Hermann	It is positive to have the regulatory framework laid out under points 2 and 3. Especially important in my eyes are the requirements of the RMA under 2.2.3 and the responsibilities of the various agencies, especially 3.3.2 for the Crown (which I understand is new), also for Kiwirail under 3.3.5	No specific decision requested	Accept	

18.7	Frank, Hermann	4.2 and the listing of those species as possible pests is supported. As indicated, they need to be included as they can cause problems in places and might cause bigger problems in the future. Also, it is a way to educate the public. However, the wording 'organisms of interest' seems a bit weak. I would suggest to call them "Pest organisms of interest" or similar. The old Plan seems to have useful wording, too.	Amend 4.2 to "Pest organisms of interest"	Reject	The term 'Organisms of Interest' was selected as these organisms have been intentionally not granted 'pest' status under the Biosecurity Act, the word 'pest' can not be used unless invoking this status. These are organisms that proposed to be 'watch-listed' for ongoing surveillance or future control opportunities.
26.1	Seddon, Clive	(1) 9.3.2 Effects on the environment Poisons and Operational Procedures.  (2) I support Environment Canterbury with their intention to use best practices to minimize detrimental poisoning such as 1080, of non target species. I have serious concerns that some of the operational procedures for poisoning, are responsible for killing many more non target species than is good for the environment and future generations.	Amend the provisions to require that care is taken not to spread 1080 or poisons into rivers, creeks or Lakes even if you have permission to do so. Notes: The poison will kill aquatic Life + Ducking/Diving Birds.	Note	The council follows best practice for pest management control in order to achieve the objectives in the RPMP. Care is taken when using poisons to ensure that this is applied according to best practice.

26.2	Seddon, Clive	See submission point 26.1	Amend the provisions to require that ECan does not promote via reports or media, that it is ok to spread 1080 and other poisons into Rivers, Creeks and Lakes. Notes: Ecan will lose credibility as a protective caring protective Environmental Organization. Although it is legal to spread 1080 and other poisons into Rivers,Lakes and Creeks does not make it right or safe. It will kill many of the Aquatic life, the water eco system and valuable non target species.	Note	See submission point 26.1
26.3	Seddon, Clive	See submission point 26.1	Insert provisions requiring Ecan to always do comprehensive surveys of their own, of Animal, Bird and Aquatic life before and after each poisoning operation. It should be prepared to quickly, alter its method if results are killing many/any non target species.	Reject	We monitor the effects of pest management on native habitats through our Biodiversity Programme where projects have been undertaken. Monitoring indigenous species in the responsibility of the Department of Conservation. Where pest management practice is found to be detrimentally affecting indigenous species, this can be reviewed without provisions in the RPMP.
26.4	Seddon, Clive	See submission point 26.1	Insert provisions to require Ecan to note areas of non target species and avoid poisoning these areas. Notes: It would be irresponsible if Ecan did lay poison in these areas.	Note	See submission point 26.1

29.1	Howard, Ted	<p>1.3 Geographic coverage. The maps do not explicitly show that ECan boundaries extend 12 miles out to sea, and that maritime biosecurity does in fact fall within the ECan jurisdiction.</p> <p>As a resident of Te Tai o Marokura, the biosecurity of this part of Canterbury is of great significance. It is significant in recreational, economic, conservation and cultural terms.</p> <p>The economic significance to this particular region is particularly high, because of our high reliance on marine ecotourism, with whales, dolphins, seals and seabirds as the major draw cards, and it is also a significant recreational area for many throughout Canterbury, with more than half the 400+ family memberships of the Kaikoura Boating Club having home addresses south of the Conway river, as well as hosting significant commercial fisheries, and embodying many sets of other values.</p>	Amend the maps to explicitly show the ECan boundaries extend 12 miles out to sea, and that maritime biosecurity does in fact fall within the ECan jurisdiction.	Accept	A new map will be provided to replace the existing map on page 2, refer to Attachment 1 for the recommended map.
29.4	Howard, Ted	I also note that I have heard significant criticism directed towards both ECan and KDC where areas controlled by them are seriously infected and are the major local seed source for reinfection, by people who have received notices to remove weeds from their property.	No specific decision requested	Note	We note this comment and will follow up regarding the operational implementation of the current Regional Pest Management Strategy outside the RPMP hearing process.

35.1	Forest and Bird - Tony Doy	The current RPMS has had some affects on weed control, but the results have not been as positive as many of us had hoped. For this to happen the new Management Plan would need some more stringent measures, but this seems not to be the case. For example, the Good Neighbour Rule is still only 10 m and the size of gorse and broom patches is still 50 m <sup>2</sup> . This is a 7m x 7m square, about the size of an average living room. Once the landowner has let it go beyond that size, there is no chance to enforce control. Since the current RPMS had been adopted, new technologies have been more in use, especially aerial spraying (which is often used to the detriment of the environment). Most landowners would use this method to control weeds.	No specific decision requested	Note	Background comment with no specific decision requested
38.1	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	We agree with the purpose of the proposed Plan as stated in Section 1.2	Support  No specific decision requested	Accept	
41.1	Langen, Helen	My submission concerns people other than landowners who are responsible for weed and pest control. I believe if Ecan was able to force people who lease land, for example, to meet the conditions of their lease that often requires that weed and pest control be undertaken, that it would take it from being a civil situation to a council controlled situation.	Oppose  Insert provisions to force people who lease land to meet the conditions of their lease that often requires that weed and pest control	Note	This is a matter that is managed outside of the RPMP, and is out of scope. The submitter is not specific to the organisations or agencies providing the leases. However, regarding regional council leased land, this concern will be passed on to our Property Services Team.

49.1	Kurow Pest Liason Committee - Peter Reid	The addition of Good Neighbour rules is a welcome move and hopefully will address some of these issues but it will only really work if you have 'good neighbours'. Enforcement will no doubt still be required in some cases but it is seen as use of a blunt instrument and does nothing for good working relationships between Ecan staff and landowners so good communication and cooperation would be seen as the first lines of approach in any impending situation.	No specific decision requested	Note	Staff agree with the submitter, it is anticipated that enforcement of a good neighbour rule would occur as a last resort after discussion and agreement between neighbours has been unsuccessful.
53.2	Rural Advocacy Network - Jamie McFadden	The use of boundary and internal rules is generally supported. However there are a small number of landowners that continually flout the boundary rules and we would like to see this addressed.	Insert provisions in the RPMP to address landowners that continually flout the boundary rules	Reject	This is a procedural issue and is managed by the implementation and compliance part of the biosecurity programme.
53.3	Rural Advocacy Network - Jamie McFadden	We support the Crown being bound by the strategy through the inclusion of the Good Neighbour Rules. This has been a significant anomaly for many years and has been a frustrating issue for landowners that share a boundary with Crown land.	Support No specific decision requested	Accept	

53.5	Rural Advocacy Network - Jamie McFadden	We support the work of the local pest committees. However we understand that the Hurunui Nassella Liaison Committee was not consulted over some of the proposed changes to nassella. This is not collaboration and we submit that pest committees should have an integral role in drafting policy changes.	Insert provisions in the RPMP to ensure that pest committees have an integral role in drafting policy changes	Reject	<p>Extensive pre-notification consultation was undertaken on the direction of the Proposal.</p> <p>The Terms of Reference state that "<i>The purpose and function of the Pest Management Liaison Committees is: a) To support the Canterbury Regional Council in implementing the Canterbury Regional Pest Management Strategy. b) To ensure ratepayer input into effective and efficient implementation of the Canterbury Regional Pest Management Strategy and the Canterbury Regional Council's biosecurity programme.</i>"</p> <p>The Terms of Reference note that a key task of the Pest Management Liaison Committees is "<i>To provide a forum for discussion on pest management matters of concern in the pest district, and particularly regarding any review of the Regional Pest Management Strategy.</i>"</p> <p>Staff acknowledge the role Pest Management Liaison Committees have regards to implementation and review of pest management strategies, but note that these groups do not play a direct role in drafting policy changes.</p>
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53.6	Rural Advocacy Network - Jamie McFadden	Our main issue is not the strategy or rules but how the rules and inspection process are implemented. There have been significant problems and inconsistencies with implementation over many years. Feedback from many landowners is that the pest implementation system has been the biggest cause of frustration in dealings with ECan. This has created an unnecessary extra cost burden on ratepayers and compromises the ability to achieve successful outcomes. If the CRPMP and rules as proposed prevents these implementation concerns from being addressed then we oppose the rules as drafted.	Ensure provisions do not exacerbate stakeholder concerns regarding implementation.	Reject	We agree that a key consideration when implementing the rules should be whether the objectives of the RPMP are being met. The rules are intended to provide a consistent requirement to achieve the objective. However, staff note that these rules will not fit every situation, and where this is the case the Act specifically provides for an exemption process where the council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate.
53.18	Rural Advocacy Network - Jamie McFadden	Inspections: We submit that a new concept be introduced into the implementation system for pest inspections for gorse, broom and nassella. Where landowners that generally have a good track record are in minor breach they should not be issued non-compliance. Some inspectors practice this concept already. As an example where a landowner has missed a small number of nassella some inspectors identify the missed areas on a map or leave a marker on a fence post while others will issue non-compliance.	Amend provisions for gorse, broom and nassella inspections. Where landowners that generally have a good track record are in minor breach they should not be issued non-compliance.	Reject	Staff consider this to be an implementation decision outside of the RPMP. There is work being undertaken as part of the council's wider biosecurity programme to develop clear protocols for implementation of the rules to ensure a consistent approach.
55.1	Waiake Forestry Ltd - Alan Ogle	We agree with the purpose of the proposed RPMP as stated in Section 1.2 and with the Objective 4 of the proposed RPMP as stated on p.35.	Support  No specific decision requested	Accept	

56.3	Hurunui District Council - Stephanie Chin	HDC supports the principles contained within the Good Neighbour Rules, the setbacks proposed within them and the fact the Crown will be subject to these rules. HDC also supports the positions of Federated Farmers and the Rural Advocacy Network in relation to the Good Neighbour Rules.	No specific decision requested	Note	Staff note this support for the good neighbour rules, and note that we are recommending to accept the request of Federated Farmers to insert a new good neighbour rule for wilding conifers, see submission point 74.1
59.1	Timaru District Council - Bede Carran	The Council is generally supportive of the strategy and the four key objectives it promotes. We support the intent of the Plan – particularly the focus on new and emerging pests.	Support  No specific decision requested	Accept	
59.2	Timaru District Council - Bede Carran	<p>The document states “...this mixed approach to road reserve pest management is the result of previous reviews of the Strategy and districts seeking local approaches to pest and road reserve management. Some road controlling authorities have indicated a willingness to take on the responsibility while others prefer existing arrangements to remain that acknowledge the different farming practices as well as general maintenance responsibilities...”.</p> <p>While we accept this is currently the case, we wonder about the inconsistency of this approach as well as the impact on those Territorial Authorities (TAs) that have accepted this responsibility. We question whether this is a reasonable way forward and its effectiveness as a sustainable, long-term approach to achieve the objectives of the plan, particularly in light of the length of time the plan is operative.</p>	Amend the PRPMP to develop a more consistent approach to the issue of pest management on formed road reserves.	Note	Staff agree with this comment, and would welcome a consistent approach to road reserve management. Staff engaged with the majority of territorial authorities (TAs) during pre-notification consultation to review the current mixed-model of responsibility for pest road reserve management. The outcome of this consultation was generally to keep the provisions as status quo. Staff would find benefit from further evidence and discussion on this through the hearings on this matter.

		<p>We estimate that Timaru District Council spends around \$20,000 per year on this work, funded by Timaru District ratepayers. We question the effectiveness and fairness of this region-wide, where some of the region's ratepayers are paying for this directly, whereas others are not. We also question the effectiveness of two distinct types of agencies (i.e. TAs and adjacent occupiers) carrying out this work, with differing motivations and funding sources.</p> <p>We believe that the management of road reserve pests should be either one or the other – managed by TAs or by adjacent land occupiers - to enable application of a more consistent approach, the use of common practices and standards and employ a consistent monitoring regime. Any management approach needs to ensure that the recovery of costs recognises an appropriate split between public and private good.</p>			
67.1	Selwyn District Council - Lisa Arnott	SDC supports the overall proposed Canterbury Regional Pest Management Plan 2017- 2037. The proposed plan aligns with the Council's current pest management strategies.	Support No specific decision requested	Accept	
72.1	Waimakariri District Council - Geoff Meadows	Further to this Council's comments on the Canterbury Regional Pest Management Review Discussion Document of January 2016, the proposal for the Canterbury Regional Pest Management Plan 2017-2037 is generally supported by this Council.	No specific decision requested	Accept	

72.2	Waimakariri District Council - Geoff Meadows	The proposed approach to pest management outlined on page 11, that emphasises that pest management is an individual occupier's responsibility, is fully supported. This of course flows on to the requirement that Territorial Authorities are required to control pests on land that they occupy. In addition, focusing more on preventing new pest plants and animals entering the Region, and placing more responsibility on individual landowners to manage pest plants and animals on their properties themselves, is commendable and supported. The shift in emphasis away from focusing solely on pest plants and animals that impact on production land, to also incorporating managing pest plants and animals for biodiversity outcomes, is also supported.	No specific decision requested	Accept	
72.3	Waimakariri District Council - Geoff Meadows	The table on page 13 (table 2) setting out the responsibility for plant pests on road reserves for each Territorial Authority in Canterbury brings welcome clarity to this issue. This records in the case of Waimakariri District that adjoining land occupiers have full responsibility for controlling plant pests on formed and unformed road reserves which is supported.	No specific decision requested	Accept	
72.4	Waimakariri District Council - Geoff Meadows	This Council agrees that it is sensible and reasonable that scarce biosecurity resources are prioritised, and that the Regional Council concentrates on programmes focused on prevention, early intervention, and	No specific decision requested	Accept	

		pest risk pathway management. In addition, the acknowledgement that for some pest plants and animals, eradication or even effective containment is not feasible, is a welcome and sensible policy setting.			
72.6	Waimakariri District Council - Geoff Meadows	The Plan is greatly enhanced by the pictures, together with a description and the adverse effects, of each of the pest animal and plant species to be managed under each pest management programme. This makes the document user-friendly, readable, practical and useful.	Retain the pictures, description and adverse effects for each pest animal and plant species.	Accept	
75.1	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga is concerned that the proposed plan may not adequately provide for the relationship of Ngai Tahu Whanui with their 'ancestral lands, waters, sites, wahi tapu, and taonga.' Whilst Te Runanga is supportive in-principle of the mechanisms proposed, Te Runanga notes that there is limited analysis as to how the plan will address pest management issues that are of importance to Ngai Tahu Whanui. For example, the plan does not identify pest species that are having an impact on Statutory Acknowledgement Areas, wahi tapu, wahi taonga or mahinga kai. Te Runanga would like to see section 70 of the Biosecurity Act more thoroughly and explicitly addressed in the finalisation of the plan.	Amend the RPMP to explicitly address section 70 of the Biosecurity Act	Accept in part	Section 9.3.1 is a summary of the effects on Maori. In addition to what was set out in section 9.3.1, the inclusion of site-led pest programmes also enables rules to be applied (if required) for site specific programmes around areas of cultural value. It is acknowledged that feral animals such as deer, pigs and goats are valued as replacements for traditional hunting resources. However, none of these feral species are priorities for pest control under the RPMP. Therefore the effect of the RPMP on the regional availability of these hunting resources will be minimal. In the development of the Proposal, Environment Canterbury has sought input from a Te Paiherenga working group and has undertaken a review of current iwi management plans. A summary of the review undertaken is included in Attachment 4. It will be important to work closely with Te Runanga and runanga throughout the life of the plan to ensure that the Council's pest management activities, both what we do and how we do it, benefit tangata when and where possible. We recommend including a fuller description of the important role of iwi management plans and ongoing partnership with Te Runanga and runanga. We consider this is a better option than 'locking in' specific elements of the iwi management plans into an appendix to the

					<p>Plan - referencing iwi management plans allows us to adapt as those plans are updated in the future. Staff recommend amending Section 2.4 to include: <u>Iwi Management Plans have been considered through the development of the plan. A number of iwi management plans have been developed by runanga, which were reviewed in the development of the PRPMP. The iwi management plans outline particular issues in relation to pest management and biodiversity, and include particular areas or sites of value to runanga in relation to mauri and mahinga kai. Using these plans as a basis, ongoing consultation will be maintained during the life of the plan to discuss pest species that are having an impact on site of value to runanga. This may take the form of a joint work programme with both Te Runanga and runanga.</u></p>
75.3	Te Runanga o Ngai Tahu - Ryan Hepburn	<p>Te Runanga supports the five-tiered approach of pest management which includes an Eradication Programme, an Exclusion Programme, a Progressive Containment Programme, a Sustained Control Programme, and a Protecting Values in Places (Site-led) Programme. This recognises the different threat levels of different pests, as well as how established they are in certain areas, and if they are a pest which is also being used for economic purposes (e.g. wilding conifers on forestry blocks). However, the long-term aim should always be eradication.</p>	<p>Ensure that the long-term aim is always eradication.</p>	Reject	<p>Eradication is not always achievable and will always come at a cost. The Act requires the council to consider the efficiency of undertaking control and whether the costs exceed the benefits. A long term goal of eradication for all pests is not always practical.</p>
75.4	Te Runanga o Ngai Tahu - Ryan Hepburn	<p>One of the most effective ways to achieve pest management goals outside of the regulatory sphere is through education. Te Runanga support the provision in the proposed plan to provide education to land-owners and occupiers. It is important,</p>	<p>Ensure that education is extended to the general public as well as the tourist industry.</p>	Note	<p>Section 5.3 of the PRPMP provides an overview of the principal measures that will be used to manage pests. Advocacy and education is wide-ranging and may be provided to landowners and/or occupiers, the general public, local communities and groups, other agencies and contractors.</p>

		though, that this education is extended to the general public as well as the tourist industry.			
75.5	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga wish to be involved in discussions around the setting of proposed containment or control areas for particular species and further work on classification options, including consideration of new pest species.	Ensure that Te Runanga is involved in discussions around the setting of proposed containment of control areas, including consideration of new pest species.	Accept	The proposed plan sets containment and control areas for pests, where relevant to the specific programme. Te Runanga will be consulted when new site-led programmes are being considered in the future.
75.6	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important to Manawhenua that pest control operations are designed and implemented so as to avoid impacts on mahinga kai and other cultural values. This includes selection of appropriate pest management tools. One important example of this should be a focus on natural solutions where possible, as opposed to the use of hazardous substances. Furthermore, within many smaller communities in the region people rely on seasonal work for income. Possum hunting and trapping are an example of this in the pest management sphere. We would like to see pest control techniques such as this to continue and be used in conjunction with other methods. To achieve the best results for all parties, on-going dialogue with Manawhenua must occur.	Ensure that pest control operations are designed and implemented so as to avoid impacts on mahinga kai and other cultural values. To achieve the best results for all parties, on-going dialogue with Manawhenua must occur.	Accept	Staff follow best practice to achieve pest management objectives. Where the council applies hazardous substances, they are used within the restrictions of the label directions. Staff will endeavour to notify local Runanga of planned control and establish discussion for alternative approaches.
75.7	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important that cultural, community, and environmental considerations do not come secondary to economic factors. All four are important and should be considered with equal weighting.	Ensure that cultural, community, and environmental considerations do not come secondary to economic factors.	Accept	Staff consider that cultural, community, environmental and economic factors are considered in the PRPMP.

75.8	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important that adequate pest management monitoring and surveillance is undertaken, and it is encouraging to see Environment Canterbury take responsibility for the monitoring and surveillance of a number of species in the plan. While such monitoring is helpful in measuring the success of pest management efforts, it can also be used to measure the effects of the approaches taken on indigenous flora and fauna. The CRPMP does not contain any provision for monitoring the effects of pest management on indigenous species.	Insert provisions in the RPMP to ensure that Environment Canterbury specifically discuss with Papatipu Runanga and Environmental Entities provisions in the CRPMP requiring the monitoring and surveillance of indigenous species which includes the power of review where current pest management practice is found to be detrimentally affecting indigenous species.	Reject	We monitor the effects of pest management on native habitats through our Biodiversity Programme where projects have been undertaken. Monitoring indigenous species in the responsibility of the Department of Conservation. Where pest management practice is found to be detrimentally affecting indigenous species, this can be reviewed without provisions in the RPMP.
75.10	Te Runanga o Ngai Tahu - Ryan Hepburn	One specific appendix to be added to the plan should involve each effected Papatipu Runanga identifying ancestral lands, waters, sites, wahi tapu, and taonga that have pest management issues. A timeframe must be put in place to ensure the appendix is created in a timely manner. This appendix, coupled with the provision for site-led programmes (discussed below), have the potential to positively influence pest management in culturally significant areas.	Insert an appendix in the RPMP detailing each effected Papatipu Runanga and identifying ancestral lands, waters, sites, wahi tapu, and taonga that have pest management issues.	Accept in part	See submission point 75.1
78.1	Department of Conservation - David Newey	The Director General supports the various Objectives, Principle Measures and Rules in this Plan, where not otherwise referred to in this submission, as being appropriate in giving effect to the Biosecurity Act.	Support  No specific decision requested	Accept	

78.2	Department of Conservation - David Newey	The Director General supports the purpose of the plan	Support  Retain Plan Establishment Section 1.2 "Purpose"	Accept	
78.7	Department of Conservation - David Newey	The Director General considers that effective site led programs require, in many cases, strong collaboration with other agencies and/or groups of land occupiers.	Support in part  Insert principal measure: Collaboration. Council will collaborate with other agencies and land occupier groups, including the development of agreements, for the effective management of pests to protect the values of specific sites.	Accept in part	This is supported, as it reflects how we will work to ensure the success of site-led programmes. Agreements may be developed as part of the collaboration element. However, this may not always be required. We recommend amending the relief sought to 'which may include the development of agreements'. We recommending including the following principal measure in section 5.3,  <u>Collaboration</u>  <u>Environment Canterbury will collaborate with other agencies and land occupier groups, which may include the development of agreements, for the effective management of pests to protect the values of specific sites.</u>  We further recommend that ' <u>collaboration</u> ' is added to the Principal measure to be used sections under objective 19 and objective 20.
79.1	Christchurch City Council - Brenda Greene	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.	Amend the RPMP to have a greater focus on 'how' would make the plan easier for landowners/occupiers to understand.	Reject	We acknowledge this comment. However, instead of providing this detail within RPMP, staff recommend that guidance material is developed to align with the 'commencement' of the RPMP.
79.2	Christchurch City Council - Brenda Greene	The change in focus and funding will give ECan greater flexibility to act	Amend the RPMP to provide clarity for how ECan will maintain existing,	Reject	The RPMP is the regulatory component of the our Biosecurity programme. Maintaining existing

		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.	and develop new programmes, including through its long standing partnerships with the Council, the Department of Conservation, and the community.		programmes will be managed under the Long Term Plan and Annual Planning processes. New programmes will be developed with partners as required and considered by council through Long Term Plan and Annual Plan processes. If a regulatory component is required this can be inserted into the RPMP, either as a small scale plan change or as part of scheduled review processes.
79.4	Christchurch City Council - Brenda Greene	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.	Amend the RPMP to clearly outline the provision of partnerships both “inside” and “outside” the plan, how the Council reports through Operations Plans and Pathway Management Plans.	Note	We acknowledge that partnerships are key to achieving pest management objectives. However, partnerships sit alongside the RPMP as another tool.  Note that submission point 78.7 seeks inclusion of a principal measure 'Collaboration' to be applied to the site-led programmes. Staff have recommended to accept this request.
79.6	Christchurch City Council - Brenda Greene	The Plan needs to provide certainty for agencies, community leaders and nongovernmental 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.	Insert provisions in the RPMP to specify how existing programmes are supported	Note	See submission point 79.2
79.7	Christchurch City Council - Brenda Greene	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	Amend the RPMP to specify the ways financial, leadership and/or regulatory support by ECan “outside” the plan may be provided or include a process “inside” the RPMP	Accept in part	We acknowledge that clear guidance may assist the community to outline the process for including new site-led programmes to the RPMP once it has commenced.

		include a process “inside” the Plan.			
79.8	Christchurch City Council - Brenda Greene	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	No specific decision requested	Note	There are other council reporting mechanisms which provides transparency on progress against objectives, such as Performance Audit Risk Committee reporting and the Annual Report.
79.9	Christchurch City Council - Brenda Greene	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.	Amend the RPMP to ensure that all partnerships with governmental and non-government organisations and Pest Management Liaison Committees are described consistently in the plan, or removed.	Note	Pest Management Liaison Committees agree the operational approach to the management of pests within a pest district and how this is rated. We consider that this is a distinct role from partnerships with other agencies.
79.10	Christchurch City Council - Brenda Greene	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.	Amend the RPMP to define the role of Pest Management Liaison Committees, if this is now a regulatory role, or if this role is undefined, state that this will be reviewed. If the role is not reviewed, then include existing partnerships such as the Community Initiative Programme (CIP).	Note	See submission point 79.9
79.11	Christchurch City Council - Brenda Greene	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	Amend the RPMP to clarify "measure of procedure"	Reject	Staff cannot find reference to 'measure of procedure'.

		<p>“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.</p>			
79.12	Christchurch City Council - Brenda Greene	<p>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.</p>	<p>Amend the RPMP to detail how ECan intends to establish partnerships "outside" the RPMP, and include details of the financial commitment and lead agency.</p>	Note	See submission point 79.4
79.13	Christchurch City Council - Brenda Greene	<p>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.</p>	<p>Support in part</p> <p>Insert the following:</p> <p>The 2012 amendments to the Act provide for regional pathway management plans. These plans.....area: 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</p>	Reject	<p>The 2012 amendments to the Act allow for the development of pathway management plans, but does not require that these are prepared.</p>

			AND state priority pathways OR provide locations on a map.		
79.14	Christchurch City Council - Brenda Greene	To guide implementation, we suggest principles be included in the Strategic background.	<p>Insert the following after first paragraph that ends with "Landowners and/or occupiers and the wider community....policies and plans."</p> <p>The following principles will be used to guide and prioritise implementation of the Strategy</p> <ol style="list-style-type: none"> <li>1. Pest-free areas shall be maintained pest free where possible</li> <li>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.</li> </ol>	Reject	The RPMP does not seek to generally keep pest free areas free of pests, only where this is a specific objective for a pest. The 'Principal measures to manage pests' in section 5.3 of the PRPMP detail the principals to be followed.
79.15	Christchurch City Council - Brenda Greene	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 per annum and trends in the density or index of abundance of a pest over a	<p>Oppose</p> <p>Amend the following:</p> <p>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</p>	Accept in part	<p>This will be further considered, as staff understand the process for this is a council decision, as it is a change in current practice. We propose to amend as follows:</p> <p>These are <del>internal Environment Canterbury</del> documents which provide technical information for the implementation of programmes, including monitoring and surveillance projects, which support the outcomes of the CRPMP.</p>

		specified area and time frame.	available document.		
79.16	Christchurch City Council - Brenda Greene	<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>Insert the following:</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>	Reject	<p>Chatham Islands has it's own strategy in place, and is not referenced in the RPMP, in the same way that other neighbouring regional council's strategies and plans are not referenced. Staff consider that any additional reference may add confusion regarding roles and responsibilities under this RPMP.</p>
79.17	Christchurch City Council - Brenda Greene	<p>Outline the roles and responsibilities of the Department of Conservation as the lead agency for the containment of pest fish except Koi carp.</p>	<p>Insert the following:</p> <p>2.2.6</p> <p>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>	Accept in part	<p>This was an unintentional omission, we propose the following be amended:</p> <p>2.2.5 Wild Animal Control Act 1977, <del>and</del> the Wildlife Act 1953 <u>and the Freshwater Fisheries Regulations 1983</u></p> <p>The Wild Animal Control Act 1977, <del>and</del> the Wildlife Act 1953, <u>and the Freshwater Fisheries Regulations 1983</u> (all administered by the Department of Conservation) have a role in relation to managing animals/fish.</p> <p>(a) The Wild Animal Control Act 1977 (WAC Act) controls the hunting and release of wild animals and regulates deer farming and the operation of safari parks. It also gives local authorities the power to destroy wild animals under operational plans that have the Minister of Conservation's consent.</p> <p>(b) The Wildlife Act 1953 (WL Act) controls and protects wildlife not subject to the WAC Act. It identifies which wildlife are not protected (eg, mustelids, possums, wallabies, rooks, feral cats), which are to be game (eg, mallard ducks, black</p>

					<p>swan), and which are partially protected or are injurious.</p> <p><u>(c) The Freshwater Fisheries Regulations 1983 places controls on people who possess, control, rear, raise, hatch or consign noxious fish without authority.</u></p>
79.18	Christchurch City Council - Brenda Greene	<p>Formed road reserves and rails are a pathways. 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>The major pathways into and out of Christchurch are the main highways and Christchurch airport. The CPMP 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.</p>	<p>Support in part</p> <p>Amend the following:</p> <p>After Table 2 and the associated note:</p> <p>3.3.4 Rail and formed road reserves</p> <p>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>	Reject	<p>We would be happy to further discuss pest management on formed road reserves with the Christchurch City Council. We do not consider that it is appropriate to develop guidelines for District Councils on this issue.</p>
79.19	Christchurch City Council - Brenda Greene	<p>The maps in the Appendices give clarity as to where 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</p>	<p>Amend the following:</p> <p>A number of pests that are well established.....in Table 14 below.</p> <p>ECan will identify areas of high value to the region as part of implementing "A Biodiversity</p>	Reject	<p>Staff do not consider that this is relevant to this plan. There are many factors considered in developing a pest management programme.</p>

		community and land occupiers as to where financial and/or regulatory support might be expected.	Strategy for the Canterbury region” or its successor, and give priority to protecting these areas through the sustained control programme.		
79.20	Christchurch City Council - Brenda Greene	How the effectiveness of the Pest Management Liaison Committees can be improved needs to be outlined.	Support in part Insert the following:  Pest management liaison committees have .....communities.  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.	Reject	Staff do not consider that a generalised statement of this nature would add value to the RPMP.
79.30	Christchurch City Council - Brenda Greene	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.	Support in part Amend as follows: 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.	Note	Staff accept this correction, please note that staff recommend that this section (section 9.3) is not retained in the final RPMP.
79.31	Christchurch City Council - Brenda Greene	We assume that the purpose of including organisms of interest is	Insert the following after Appendix 2, Organisms of Interest	Reject	The explanation for the purpose of the Organisms of Interest list is detailed in section 4.2 "Ools are not

		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.	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)		accorded pest status but future control of them could arise, for example through Site-led programmes. A review of the Plan may be necessary to include them as pests. "
81.8	QEII National Trust - Alice Shanks	See submission point 81.7	Provide clarity in the RPMP to detail policy around collaboration with other agencies like DOC	Note	We acknowledge that partnerships and collaboration are key to achieve pest management objectives. However, partnerships sit alongside the RPMP as another tool. Staff note that collaboration may be a key component of site-led programmes and recommend to add this as a Principal measure (see submission point 78.7)
81.9	QEII National Trust - Alice Shanks	See submission point 81.7	Amend the RPMP to give effect to the NPPA	Reject	Biosecurity Officers undertake inspections to ensure that pests (classified in the RPMP) or unwanted organisms are not being sold, propagated or distributed.
82.1	Ministry for Primary Industries - Sherman Smith	We consider the proposal to generally meet the requirements of the NPD, however we have some specific comments regarding aspects of the proposed good neighbour rules	No specific decision requested	Accept	
90.4	Johnstone, Robert	The enforcement division need to have regard for the prevailing economic circumstances and the ability to pay. On this property we have had a very active control programme over the decades when it has been affordable. But every property is different and there needs to be some flexibility and	Amend the RPMP to ensure flexibility about enforcement	Reject	Staff do not consider that it is appropriate to detail a flexible approach to enforcement in the RPMP. Enforcement decisions are managed outside of the RPMP and there is some flexibility provided, depending on the individual circumstances.

		understanding about enforcement.			
90.5	Johnstone, Robert	there needs to be more consistency with enforcement, there are properties near or neighbouring this one where no enforcement was done and it is wall to wall and now compliant, whereas if we get seedling re-growth we are non compliant and have to take control action. And there should not be arbitrary boundaries determined in the office with no consultation which allows some (in this case the Crown) to get off scott free with OMB infestations in the riverbed.	Ensure that enforcement is applied consistently.	Reject	The consistency of approach is managed in through staff procedures. There are now Good Neighbour Rules requiring the prevention spread of old man's beard across boundaries, it has not been possible to bind the Crown to regional pest management rules until now.
90.17	Johnstone, Robert	Roadsides The rules here are (almost) fine but only if there is even enforcement throughout the region. Otherwise a return to the recommendations of the 2006 review would be my preference .. ----that is to hand over the responsibility for roadsides to the local District Councils .  ( Hurunui DC take charge of theirs now and it works well.) Enforcement in this Waimakariri District by Ecan is very patchy and inconsistent EG making farmers cut their gorse fences before the end of January (before Gorse flowers) is quite silly Cutting gorse fences is a job for the winter months not busy summer time, and gorse usually flowers twice a year anyway And having a 4 or 5 year interval between inspections seems too long.	Amend the RPMP to ensure that roadside rules are enforced evenly throughout the region	Reject	The consistency of approach is managed in through staff procedures.
90.18	Johnstone, Robert				

		Enforcement & Recognition of Efforts   believe a whole property approach should be standard practice for larger properties with efforts being made appropriately recognised.	Amend the RPMP to apply a whole of property approach to enforcement	Reject	The implementation of the rules sits outside the provisions of the RPMP, we consider it may be appropriate to seek an exemption in cases where occupiers are seeking to develop an alternate way to manage pests. This might include an agreed programme which ensure that the objectives of the RPMP will still be met. Refer to section 8.3 of the PRPMP for the details of the Exemption process.
92.1	McDonald, Fiona	This would allow the community to receive the appropriate education and support to understand the necessity to remove pest species from their properties.	Support Retain provision 5.3.4 (c)	Accept	
92.2	McDonald, Fiona	Support a regionally coordinated approach.	Support Retain provision 1.2	Support Accept	
93.1	Otago Regional Council - Warren Hanley	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.	Ensure that effective pan-regional pest management occurs through a collaborative approach, including identifying where we seek common desired outcomes.	Note	Staff agree that a collaborative approach for pan-regional pest issues is a desired outcome. However, we recommend that this happens at a organisational relationship level, rather than through the RPMP regulatory document.

Number	Name	Submission	Relief	Staff Recommendation	Reasons
49.5	Kurow Pest Liason Committee - Peter Reid	We also request that Ecan pursue with the relative scientific agencies the future role of genetics in pest control as long term this seems to be where some of the answers may lie, we know the future use of poisons is going to become more and more difficult because of environmental reasons and public perceptions.	Insert provisions in the RPMP for Ecan to pursue with the relative scientific agencies the future role of genetics in pest control as long term	Note	This is out of scope of the RPMP, but staff follow the work of scientific agencies in seeking alternate ways to manage pests.
56.4	Hurunui District Council - Stephanie Chin	HDC has concern about the general direction of the strategy and the financial implications it would within them and the fact the Crown will be subject to these rules. HDC also supports the positions of Federated Farmers and the Rural Advocacy Network in relation to the Good Neighbour Rules.	No specific decision requested	Note	Staff would find benefit in discussion during the hearing to understand the reasons for concern regarding the general direction of the strategy.

58.1	KiwiRail Holdings Limited (KiwiRail) - Pam Butler	<p>The Plan identifies Kiwi Rail as a key stakeholder in the Plan and that the Council will work by agreement on mutual obligations and expectations. There are unusual practical challenges associated with managing pests along linear infrastructure such as the rail corridor. Manly it is difficult to access due to;</p> <ul style="list-style-type: none"> <li>• terrain</li> <li>• limited access points</li> <li>• difficulty identifying pest plants from the track (especially low numbers and seasonal species)</li> <li>• the need for specialist equipment and extensive planning and staging work between operational train activities.</li> </ul> <p>KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken while recognising specific operational and access logistics, cost constraints, and current pest management control measures.</p>	Retain provision 3.3.5	Accept	
58.2	KiwiRail Holdings Limited (KiwiRail) - Pam Butler	<p>KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken within operational/financial parameters. As noted in Clause 3.3.5, KiwiRail supports discussing and agreeing an approach which recognises its unique circumstances. The PPMP should include provision for alternate management approaches (such as an</p>	<p>Amend Section 8 to make mention of alternate formal pest management responses, for example;</p> <p>Council may develop alternative management plans (including Management Plans with agencies to establish levels of service with those agencies, to act to control pests on their land to agreed</p>	Reject	<p>Staff agree with the concept of developing a Management Plan to agree an approach for achieving pest management outcomes with KiwiRail. However, it is not possible to provide a provision for a general alternative to compliance through this mechanism.</p>

		<p>agreed Management Plan) as a method of compliance with the PPMP. A mutually developed Management Plan would target efforts, over the life of the Plan, with appropriate review points. Priorities could include a focus on regionally significant ecological areas/sites and areas being adversely affected economically.</p> <p>A Management Plan approach is a useful approach to priority setting, monitoring and adaptation where management options are limited by physical and economic constraints. They provide the opportunity to adapt, update and revise implementation methods and locations over time, within an overall structure where action can be agreed, and then programmed over the term of the Plan. A Clause should be included to make reference to alternative methods of achieving PPMP Compliance including negotiated Management Plans. This has the advantage of providing both parties with greater certainty about achieving plant pest management outcomes.</p> <p>Management Plans can provide for a progressive control over time and add value to the control objectives. Management Plans could also include:</p> <ul style="list-style-type: none"> <li>• contributions to biological control agent trials and release</li> <li>• targeted timing of pest management with agency or other projects</li> </ul>	<p>priorities.</p>		
67.2	Selwyn District Council - Lisa Arnott	SDC supports the use of biological plant pest control initiatives. SDC	Support	Note	We accept this comment, but note that this is an area of our wider Biosecurity programme and is not

		considers that there has been good progress made in recent years in research and trials of biological controls, and that it is important to continue to utilise to progress these types of pest control methods.	Amend the RPMP to ensure that biological plant pest control initiatives continue to be utilised to progress these types of pest control methods.		required to be noted in the RPMP.
67.5	Selwyn District Council - Lisa Arnott	Selwyn District Council supports adjoining land owners being fully responsible for plant pests on road reserves.	Support  No specific decision requested	Accept	
72.7	Waimakariri District Council - Geoff Meadows	The monitoring objectives set out in table 32 on pages 68-70 are sensible and practical. This Council has an interest in the proposed operational plan that is to be prepared within three months of the commencement date of the Plan, and in the report on the operational plan each year.	No specific changes requested	Accept	
72.8	Waimakariri District Council - Geoff Meadows	The analysis of costs and benefits by pest types as set out in Table 31 in pages 76-80 provides a sensible overview of the analysis of costs and benefits undertaken. The assessment of the effects on the environment in section 9.3.2 is a little light, and could do with some more in-depth description of the environmental benefits to Canterbury that will flow from implementing the Plan.	Amend provisions in the PRPMP to provide more in-depth description of the environmental benefits	Note	We accept this comment, and would like to note that there is a detailed benefit to Canterbury described for each individual pests. Also, please note that staff recommend that section 9.3 is not included in the final RPMP.
73.1	Ministry of Education - Jess Bould	Environment Canterbury has outlined that it will be undertaking most of the upfront work on the site-led programmes. The Ministry would appreciate it if further details of this "upfront work" can be provided.	Amend the RPMP to provide further details of this "upfront work", ensure that the Ministry and the schools are fully informed of pest management procedures on or near to the school sites. This is so that	Reject	Staff agree with the commentary in this submission point, that this level of detail is not necessary in the RPMP. Staff will make contact with the Ministry and the individual schools that are part of site-led programmes to further discuss the full details of the control programme (on and nearby the schools),

		<p>Although this level of detail may not be necessary for the Proposed Plan, it would be beneficial for the Ministry (as the landowner) and the two schools (as the occupiers).</p> <p>The Ministry, Governors Bay School and Omarama School would like to be fully informed of any pest management procedures on or near to the school sites. This is so that the potential effects of these procedures (such as spraying) can be fully considered, particularly in relation to the safety of students.</p> <p>The Ministry wishes to work with Environment Canterbury to ensure that these programmes are successfully carried out. Both schools have however indicated to the Ministry that given the financial constraints they operate under the potential financial implications to the two schools of having to maintain and undertake site-led programmes will have to be considered in any works.</p>	<p>the potential effects of these procedures (such as spraying) can be fully considered, particularly in relation to the safety of students. Financial implications for the schools to maintain and undertake site-led programmes also will have to be considered in any works.</p>		<p>including the initial work, if and how chemical sprays will be used, and the ongoing control that may be required.</p>
75.9	Te Runanga o Ngai Tahu - Ryan Hepburn	<p>It is important that pest management techniques involving chemical, biological, and any other means to contain or eradicate a pest are done to best management practice. To avoid compromising water quality, applications must consider suitable climatic conditions, not be made directly to water, and have a suitable buffer zone between the point of application and any waterways. Additionally, 'best management practice' is a concept that should not remain static, rather, it should constantly be revised and improved to</p>	<p>Insert provisions in the RPMP to ensure that best management practice is used, and that a precautionary approach is applied.</p>	Reject	<p>Staff consider that provisions in the PRPMP already adequately cover these management techniques. Where the council is undertaking control operations, we will work to best practice standards as outlined in Section 9.3.2. We will use advocacy and education to assist landowners to work to best practice management.</p>

		<p>stay up to date on the latest technological and scientific advancements.</p> <p>Lastly, we request Environment Canterbury adopts a policy of erring on the side of caution when the risks and effects associated with a particular element of pest control are not known.</p>			
78.8	Department of Conservation - David Newey	<p>The Director General supports the inclusion of Good Neighbour Rules for the species listed. These are rules that bind Crown agencies. Good Neighbour rules must align with the Biosecurity Law Reform Act 2012 and the National Policy direction which has accompanying guidance material. We do not agree rules for Bennetts wallaby and Nassella tussock meet good neighbour rule requirements. The Director General seeks additional rules for wilding conifers.</p>	<p>Support in part</p> <p>Amend proposed rules to include a distance that meets the requirements of the National Policy Direction. We suggest a 20m boundary distance for Nassella Tussock, and a 1km boundary distance for Bennetts wallaby. The 1km distance is consistent with the document provided as supporting the proposed plan and is titled "Meeting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits. Additional rules for wilding conifers will be addressed in other sections of our submission further on.</p>	Note	For further detail see submission points 78.24 and 78.15
88.5	Forest and Bird - Jen Miller	<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</p>	<p>Support in part</p> <p>Amend the section 5.5 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</p>	Note	Staff acknowledge and support the submitter's comment regarding widening the membership of the Pest Management Liaison Committees. However, the terms of reference and the membership of these Committees are set by processes outside the RPMP. Staff suggest reassessing the membership and function of these groups to ensure they are fit for purpose, outside of the RPMP review. This has been flagged in the PRPMP with the following comment: 'Environment Canterbury has appreciated

	example Iwi, DOC and conservation groups such as Forest and Bird.  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.	of the opportunity for groups to be invited to apply to be members of a committee.	the work of these committees, and intends to continue to work with stakeholders and communities.'
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### Requests for Additional Pests

Number	Name	Submission	Relief	Staff Recommendation	Reasons
5.1	Davies, Mike	Steps need to be put in place to eradicate feral cats.	Insert provision to eradicate feral cats.	Reject	Per submission point 5.3, the council does not have the ability or the capacity to eradicate feral cats on a region-wide basis.
5.3	Davies, Mike	<p>The pest management needs to include the following,</p> <ul style="list-style-type: none"> <li>• It is illegal to release cats into the wild.</li> <li>• Householders are permitted a maximum of two desexed cats.</li> <li>• The only people to have non desexed cats are registered breeders.</li> <li>• All cats to wear a collar with a bell. All cats to be kept inside at night.</li> </ul> <p>My reasons for this is the number of feral cats I shoot around my house (rural style no life block) every year. The worst year I destroyed 40 cats and have averaged between 5 and 10 cats a year for the last 31 years</p>	Insert provisions that will make it illegal to release cats into the wild and put conditions on domestic cats.	Reject	We agree that feral cats are a predator to native wildlife, however, the council does not have the capacity to monitor cat release into the wild and enforce conditions on domestic cats.

13.1	Beatson, Judith	Cats should be included in the pest plan. At a minimum feral cats should be included because of the damage they inflict on bird life. Personally I believe there should be controls in place for domestic cats regarding the maximum number of cats per household and the uncontrolled wandering of these cats. In many places in the world domestic cats are household cats not neighbourhood cats and they live contented lives. Why not also add some controls on Canterbury's domestic cats and give with wildlife in urban areas a chance.	Insert provisions for control of cats in the pest plan including the maximum number of cats per household and the uncontrolled wandering of these cats.	Reject	The Council does not have the capacity to enforce conditions on domestic cats.
13.2	Beatson, Judith	See submission point 8.1	Alternative relief if sought in point 8.1 is not granted, insert feral cats to the Ecan pest plan.	Reject	We agree that feral cats are a predator to native wildlife, however, the council does not have the capacity to control or enforce the presence of feral cats throughout the region.
45.1	Predator Free New Zealand Trust - Rebecca Bell	Pest management is important for biodiversity reasons as certain pests have a significant impact on our native species. Declaring feral cats, mustelids and rats as organisms of interest rather than pests does not show regional leadership for predator control. Organisms of Interest don't have a clear plan on how these will be managed. We believe feral cats, mustelids and rats should all be included in the RPMP as site-led pests. These predators have a catastrophic effect on our native birds, lizards and other animals.  We note that under 4.2 it stats "Ools are not accorded pest status but future control of them could arise, for example through Site-led	Insert provisions in the RPMP to include feral cats, mustelids and rats as site-led pests.	Reject	We agree that these predators can have a catastrophic effect on our native birds, lizards and other animals. However, without specific information regarding what would compromise a site-led programme for these pests, we are unable to assess our capacity to deliver this programme. In order to consider a programme (site-led or non-RPMP), detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would be required.

programmes. A review of the Plan may be necessary to include them as pests.” It is almost certain that these predators will need to be (and are currently) controlled for biodiversity in certain sites around the region. We therefore would suggest to include them as pests now to save rework of the RPMP at a later date.

In July last year the Government announced the Predator Free 2050 programme to rid New Zealand of possums, stoats and rats. The Government is seeking to support large-scale collaborative predator control projects. Canterbury has a number of sites that are potential projects and we encourage ECAN to help support large scale predator control projects. Including feral cats, mustelids and rats as pests in the plan helps support this. Feral cats require a clear definition for any cat control to occur. Cats are the one pest that are also a common pet. Therefore it is necessary to be able to tell the difference between an owned cat and an unowned cat. We suggest the addition of a definition. A suitable definition would be “a feral cat is a cat without a microchip, collar or harness.” This would allow cat control to occur near populated areas without the risk of harming any owned cats. Not only are cats a biodiversity pest they are a primary production pest spreading toxoplasmosis to sheep. Farmers currently immunise their sheep but immunisation is not 100% effective and “toxoplasmosis” can still infect flocks resulting in a significant loss of livestock and foetuses.

47.1	Morgan Foundation - Jessi Morgan	<p>The Morgan Foundation are concerned that most biodiversity pests have been removed as pest from the proposed plan and have been reclassified as Organisms of Interest.</p> <p>Specifically a feral cat should be defined as any cat without a microchip, collar or harness. This would allow cats to be legally managed in sensitive wildlife areas, particularly those near populated areas. Currently there is no definition of a feral cat in the plan. This means there is no way to tell if a cat is owned or not and means that feral cats cannot be controlled in sensitive wildlife areas, especially those near settlements.</p> <p>Wandering cats have an impact on native biodiversity through the predation of native birds, reptiles and insects. Regional Councils have a responsibility to provide leadership in protecting our biodiversity and ECAN need to include relevant biodiversity pests in their plan.</p>	Insert provisions to include feral cats in the plan as a site led pest.	Note	We agree that feral cats are a predator to native wildlife, in order for council to consider a programme (site-led or non-RPMP), detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would be required.
47.2	Morgan Foundation - Jessi Morgan	See submission point 47.1	Insert provision to define feral cats as any cat without a microchip, collar or harness.	Reject	Due to the response in submission point 47.1, staff do not see that a definition of feral cats is required.
47.3	Morgan Foundation - Jessi Morgan	See submission point 47.1	Insert provisions to address cat colonies and prohibit the establishment and support of colonies. Especially near ecologically sensitive areas.	Note	Refer to submission point 47.1
53.17	Rural Advocacy Network - Jamie	Cats: The release and spread of cats	Insert rule to prohibit the release of	Reject	The council does not have the ability or the capacity

	McFadden	<p>continues to be a concern. Farmers in the Hurunui area are regularly seeing cats and there seems to have been an increase in the number of cats being released into the countryside recently. Cats are also commonly seen in riverbeds particularly near areas where people visit. Some regional council's e.g. Greater Wellington has feral cats listed in the pest strategy and a rule that prohibits the release of cats into the wild. We support the inclusion of a similar rule into the CRPMP.</p>	cats into the wild.		to monitor cat release into the wild.
64.5	Banks Peninsula Conservation Trust - Maree Burnett	<p>Mustelids, rats and feral cats should be added to the possum site-led Programme for Banks Peninsula if funding for that can be allocated in a fair and equitable manner. This would be consistent with the approach being adopted and considered in other parts of the country (eg Whangarei, Hawkes Bay, Auckland). The area identified as the site-led area should be extended so that it covers all the Banks Ecological Region.</p> <p>This is consistent with, and necessary to achieve, the Banks Peninsula Ecological Vision 2050. It is also consistent with the Government's predator-free New Zealand by 2050 vision. Adding these other pests to possums for Banks Peninsula is beneficial for all the reasons set out in Table 29, and is also supported by the reasons for the site-led programme set out in section 31 and Appendix B of the Economic Analysis report prepared by Mr Harris.</p>	<p>Amend table 29 on page 61 by adding the words "Mustelid, Rat and Feral cats" after "Possum" and including their scientific names.</p> <p>Insert comments in table 30 beginning on page 62 on mustelids, rats and feral cats, consistent with the description and discussion about possums.</p> <p>Amend table 31, objective 19 by including specific targets for mustelids, rats and feral cats.</p> <p>Amend the contents page of Appendix 3 on page 104 so that item 10 refers to Possum, Mustelid, Rat and Feral cat (site-led).</p> <p>Amend map 10 so that it refers to Possum, Mustelid, Rat and Feral cat.</p> <p>Amend map 10 so that the site is enlarged to cover all the Banks Peninsula Ecological Region.</p>	Note	<p>Staff acknowledge that Banks Peninsula Conservation Trust are working to achieve the objectives of the 2050 Vision statement, however, there is not enough detail in this submission to provide comment on including a site-led programme managing mustelid, rats and feral cats on Banks Peninsula. For example, a management objective, or reduction and timeframe has not been suggested. We appreciate the request to work together to identify a fair and equitable funding formula, however, before a programme can be considered to be added to the RPMP, a funding mechanism needs to be confirmed and the affected community needs to be able to provide comment on this. Depending on the objective, this programme may require significant funding, and commitment as an ongoing programme. Staff also note that this would not be suited to be part of the existing possum site-led programme, as the control schedule and methods are different from that of possums.</p>

			Insert provisions in the RPMP to work with Banks Peninsula Conservation Trust to consider and implement a fair and equitable funding formula for the site-led programme.		
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Staff Recommendation</b>	<b>Reasons</b>
22.1	Richardson, Pam	<p>I own and operate in partnership with my husband Ian and son Andrew a 670ha Banks Peninsula sheep and beef hill country property in Holmes Bay Pigeon Bay. The Environment Canterbury Regional Policy Statement significant indigenous vegetation criterion only needs one plant to be identified as significant. This is an extraordinarily high 'catch all' criteria and means that on our property every area is significant and therefore this indicates that perhaps the entire 'bush cover' on Banks Peninsula is of significant ecological value.</p> <p>Banks Peninsula has a long history of goats and damage to indigenous vegetation. In 1988 a call went out to set up a community group to eradicate goats. More recently we have had a Bank Peninsula goat working group -a partnership between Environment Canterbury, the Banks Peninsula Conservation Trust, the Department of Conservation and the Christchurch City Council. I have been involved with the Banks Peninsula Goat Eradication Programme including the development of the strategy prepared by Landcare Research in 2005 and continue to be a member of the working group today. The programme has been successful in that over 5000</p>	Insert provisions in the RPMP to eradicate feral goats on Banks Peninsula	Reject	We are supportive of managing feral goats on Banks Peninsula, and agree with the submitter's comments regarding the importance of controlling goats to protect indigenous vegetation. We also agree that much has been achieved over the years by both agencies and volunteers in respect to controlling feral goat numbers and we would not want to lose ground on this. We recommend to continue to support the Banks Peninsula goat working group at an operational level, outside the RPMP. The Department of Conservation is also part of this group, and due to the small number of occupiers that are resistant to enabling goat control, we consider that duplicating regulation through the RPMP is not necessary and the regulation under the Wild Animal Control Act 1977 is sufficient.

goats have been eradicated over the last ten years at a cost of over \$300,000. Considerable numbers of 'volunteer man hours' have also contributed. Including goats in the Regional Pest Management Plan would be an indication that 'we mean business'.

The Department of Conservation states that the Wild Animal Control Act is almost completely unenforceable and they do not have the resources to implement this except in a very extreme situation. This cannot be relied on as a broad solution for the small number of properties with feral goats. The reality is if we are to going to get rid of goats we need the policies and tools to support the eradication of goats right now. We cannot afford to lose any more ground.

The majority of landowners are aware of and support the programme e.g. by allowing trained shooters on to their land; they understand the importance of reporting where the goats are. Landowners do understand the reasons behind eradicating the goats.

The goat working group know where the remaining feral goats have been observed - in the remaining pockets in discrete areas across the Peninsula. The recent fires have also dispersed goats around the city boundary.

If it is required to set up another Community Initiated Programme, going through extensive consultation to achieve the required outcome will not be easy to achieve. We would need to lead the process and have

		<p>engagement with landowners a number of meetings and a submission process etc. There may not be the 'buy in' required.</p> <p>We need to build on the programme we already have in place. The earthquakes and fires etc. have impacted the work programmes over recent year's .This year's programme with funding from the DoC, Environment Canterbury and the CCC has managed to almost clear the Kai tuna area. A report of this year's operation will be available shortly.</p>			
64.1	Banks Peninsula Conservation Trust - Maree Burnett	<p>In 2016 BPCT launched the 2050 Ecological Vision for Banks Peninsula (including the Port Hills). This Vision has received widespread support from the community, conservation groups, and agencies. Comprised of eight ecological goals, the final goal "Banks Peninsula is effectively free of pest animals" seeks to reduce pest animal numbers to a level which enables indigenous species to thrive and increase, and protected forest understoreys to flourish free from grazing by exotic mammals.</p> <p>Feral goats, defined as those that are untagged and not kept behind a goat-proof fence, are a major threat to native and endemic plants, destroying both flora and fauna biodiversity.</p> <p>Herding browsers such as goats, cause two-fold damage by eating native plants and by trampling large areas of vegetation and compactable soils.</p>	<p>Insert provisions to include feral goats in the list of organisms declared as pests. Changes required are specified below</p> <p>Insert the following into table 3:</p> <p>Common name: Feral goat</p> <p>Scientific name: Carpa hircus</p> <p>Primary programme: Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)</p> <p>Insert feral goat name details (above) into table 8.</p> <p>Insert into table 9, a description of and discussion about feral goats, consistent with the rest of the table, and consistent with the comments made in this submission.</p>	Reject	<p>We are supportive of managing feral goats on Banks Peninsula, and agree with the submitter's comments regarding the importance of controlling goats to protect indigenous vegetation. We also agree that much has been achieved over the years by both agencies and volunteers in respect to controlling feral goat numbers and we would not want to lose ground on this. We propose to continue to support the Banks Peninsula goat working group at an operational level, outside the RPMP. The Department of Conservation is also part of this group, and due to the small number of occupiers that are resistant to enabling goat control, we consider that duplicating regulation through the RPMP is not necessary and the regulation under the Wild Animal Control Act 1977 is sufficient.</p>

They have strong preferences and will eat out favoured species first such as, broadleaf/papauma (*Griselinia littoralis*) and mahoe (*Melicytus ramiflorus*), before moving on to less desirable plants. Goats will also strip bark off trees and by eating young seedlings they effectively put a stop to forest regeneration. Feral goats on Banks Peninsula are able to climb bluff systems and eat the rare and threatened plants that are endemic to Banks Peninsula such as Akaroa daisy. They also damage the integrity of forest and open up routes for lesser predators to access forest, such as possums and feral cats.

Feral Goats are a significant threat to high-value biodiversity areas on Banks Peninsula such as Hinewai Reserve, public conservation land, and Banks Peninsula Conservation Trust and QEII National Trust covenants on private land. The Banks Peninsula Conservation Trust has covenanted over 1100ha of private land with 62 covenants completed at a cost of over \$1M. Feral goats pose a significant threat to this investment in biodiversity protection.

Banks Peninsula has many Sites of Ecological Significance, Recommended Areas for Protection, and rare ecosystems that are yet to be covenanted or protected. The impact of feral goats are highest in these areas.

The Banks Peninsula Feral Goat Eradication Programme is implemented collaboratively by Environment Canterbury (ECan), the

Department of Conservation (DOC), Christchurch City Council (CCC) and the Banks Peninsula Conservation Trust. The programme stemmed from public concern about feral goat damage to bush reserves and native plantings in the late 1980s and early 1990s, coupled with the collapse of the goat industry making them virtually worthless to farmers overnight.

The ~500 remaining animals on private land pose a significant threat to the efforts of the programme so far. Normal fences present no barrier to feral goats, and re-infestation of previously cleaned-out areas creates significant extra work and cost.

If feral goats are not eradicated from Banks Peninsula the remaining goats could quickly reestablish to an unmanageable level. ECan has already invested ~\$300,000 on goat eradication removing 5000 goats and goat numbers are now believed to be below 500. If the remaining goats are not eradicated the investment already made is put at risk.

Who benefits: Banks Peninsula has become a national leader for conservation on private land with a passionate and engaged community driving biodiversity protection initiatives. The benefits of this proposal are for the whole BP community who have already worked cooperatively over a sustained period to remove feral goats from private and public land. Additionally, farmers who do not want feral goats on their properties will benefit from full eradication (see list of threats to

agriculture).

Cost: The cost of this change within the plan would be insignificant and it would serve to protect ECan's investment of \$300,000 already made on the Feral Goat Eradication Programme. (Additional investment in the programme has also been made by Department of Conservation and BPCT). The cost of not achieving feral goat eradication through the threat to biodiversity, on the other hand is significant and ongoing, and likely to be the failure of the program and the return of widespread feral goat pests across Banks Peninsula.

Benefit Cost Ratio: The benefits of including eradication of feral goats on Banks Peninsula in the RPMP far outweigh the costs involved, not only to ECan but also to the wider community and the economy of Banks Peninsula. In addition to primary production, tourism is a key driver of the Banks Peninsula economy. Farmers are reliant on good neighbour rules and strong farm to farm biosecurity measures so that weeds such as gorse or diseases such as TB do not become a risk to economic viability. Conservation has also become an employer and driver in the economy of Banks Peninsula with Banks Peninsula Wool brand showcasing the conservation covenants farmers have on private land that sets them apart.

64.2

Banks Peninsula Conservation Trust - Maree Burnett

See submission 64.1

Insert in table 10 beginning on page 29, amend Plan Objective 2 by adding after the words "... within the

Reject

See submission point 64.1. Also, it is not explained what measures would be required to achieve the objective, for instance, there is no detail of what

			Canterbury Region” the words “, and within 5 years of the commencement of the Plan, eradicate feral goats within the Banks Peninsula Ecological Region as shown on Map 10 of Appendix 3.		could be expected from occupiers to manage feral goats.
78.33	Department of Conservation - David Newey	Goats on Banks Peninsula – extensive interagency co-operation is currently occurring and including Goats as a pest agent on the Peninsula would enable another tool to be used to eradicate wild goats there.	Support in part  Insert provisions to include Goats as a pest agent in Table 29 and include an appropriate addition to Objective 19 and Appendix 3. Including the Regional Council to prepare a Cost/Benefit analysis for Goats as a pest agent on Banks Peninsula.	Reject	We are supportive of managing feral goats on Banks Peninsula, and agree that much has been achieved over the years by both agencies and volunteers in respect to controlling feral goat numbers and we would not want to lose ground on this. We propose to continue to support the Banks Peninsula goat working group at an operational level, outside the RPMP. We consider that duplicating regulation through the RPMP is unnecessary and the regulation under the Wild Animal Control Act 1977 is sufficient. We seek to work alongside the Department of Conservation to continue to achieve reductions in goat levels on Banks Peninsula.
79.5	Christchurch City Council - Brenda Greene	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.	Insert provisions to declare feral goats to be a pest, and that ECan supports DOC by providing another tool to assist in achieving the objective.	Reject	We don't consider that the plan has indicated a change in the lead agency. The council still intends to contribute (at the same level) to the Banks Peninsula joint working group for goats, but we do not consider that a double up of regulatory tools is required to achieve the objectives of the programme. We intend to work alongside DOC and utilise the existing regulation for feral goats under the Wild Animal Control Act.
79.22	Christchurch City Council - Brenda Greene	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 a range of values.  We note the Department of Conservation is the lead agency under	Support in part  Insert provisions to include feral goats in the site-led programme, table 29, and add description from page 58 of the Canterbury Pest Management Strategy 2011-2015 to table 30	Reject	We are supportive of managing feral goats on Banks Peninsula. We also agree that much has been achieved over the years by both agencies and volunteers in respect to controlling feral goat numbers and we would not want to lose ground on this. We recommend to continue to support the Banks Peninsula goat working group at an operational level, outside the RPMP. The

		<p>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.</p> <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. Past experience has shown that relying on individual voluntary action is not effective in achieving plan objectives.</p>			<p>Department of Conservation is also part of this group, and due to the small number of occupiers that are resistant to enabling goat control, we consider that duplicating regulation through the RPMP is not necessary and the regulation under the Wild Animal Control Act 1977 is sufficient.</p>
79.23	Christchurch City Council - Brenda Greene	See submission point 79.2	<p>Support in part</p> <p>Insert the following to table 31:</p> <p>Plan objective 21</p> <p>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>	Reject	See submission point 79.2. Staff consider that allowing up to 20 goats per hectare is expected to enable an increase on current goat numbers on Banks Peninsula.

79.24	Christchurch City Council - Brenda Greene	See submission point 79.22	<p>Insert the following rules:</p> <p>Plan rule 6.4.13</p> <p>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</p> <p>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>	Reject	See submission point 79.22
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Staff Recommendation</b>	<b>Reasons</b>
10.1	Te Korowai o Te Tai o Marokura - Gina Solomon	<p>Kaikoura currently has only one unwanted marine organism, Undaria pinnatifida. This is now spreading from the harbour area in South Bay. Canterbury hosts two other unwanted marine organisms Sabella spallanzii and Styela clava which are both known to present in Lyttleton Harbour. These may be present in other locations, but the Council has commissioned no surveys for marine organisms. The only data are from NIWA port surveys conducted for the Ministry for Primary Industries.</p>	<p>Oppose</p> <p>Insert provisions for Control of Undaria pinnatifida, which is now spreading in the Kaikoura marine environment.</p> <p>This would involve:</p> <ol style="list-style-type: none"> <li>1. A delimitation survey to identify the limit of spread;</li> <li>2. Regulation of vessels to require hulls to be clean of Undaria;</li> </ol>	Note	<p>We agree that marine biosecurity is a function of regional councils, and we note that council has had limited input into this area to date. Most of the marine control has been undertaken in collaboration with the Ministry for Primary Industries (MPI).</p> <p>Staff would benefit from receiving further evidence and discussion at the hearing. However, we anticipate at this stage that an initial scoping exercise of marine biosecurity management in Kaikoura and wider Canterbury is required. We would like to undertake this in consultation with Te Korowai o te Tai o Marokura, should the submitter be comfortable with this. This may also include</p>

		<p>Other harmful marine organisms already present in New Zealand include the Asian paddle crab, the Australian sea squirt <i>Pyura doppelgänger</i>, and the droplet tunicate <i>Eudistoma elongatum</i>. Locations with these organisms are connected to Canterbury and to Kaikoura through pathways mediated by vessels, and by marine farming and fishing activities. Other regional councils have made provision for marine biosecurity. In the benefit/cost analysis for Northland benefits exceeded costs at a rate for more than 8 to 1. With a million tourists a year historically coming to Kaikoura for its marine environment, it is hard to imagine that a similar benefit ratio would be achieved for a substantial marine biosecurity programme here.</p>	<p>3. Preventing of further marine dumping of <i>Undaria</i> contaminated materials;</p> <p>4. Control in new nodes using techniques developed in Fiordland.</p>		<p>working with the Department of Conservation, MPI, other regional councils, and communities.</p>
10.2	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 10.1	<p>Oppose</p> <p>Insert provisions for the Control of <i>Sabella spallanzii</i> and <i>Styela clava</i> where they are present in the region, and exclusion of these harmful organisms from the Kaikoura marine environment.</p> <p>This would involve:</p> <p>1. Assessment of current nodes of infection (if they have spread beyond Lyttleton);</p> <p>2. Regulation of vessels entering or moving in the region to require that they are free of these pests (using the Northland Regional Council provisions as a model);</p>	Note	See submission point 10.1

			<p>3. Regular inspection of South Bay and Kaikoura moorings for these pests.</p> <p>4. Incident response.</p>		
10.3	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 10.1	<p>Oppose</p> <p>Insert provisions for the Exclusion from the region of all other harmful marine organisms given “unwanted” status by the Ministry for Primary Industries.</p> <p>This would involve:</p> <ol style="list-style-type: none"> <li>1. Listing those organisms in the Regional Pest Management Plan;</li> <li>2. Engaging in public awareness, intelligence gathering, compliance and response activities.</li> </ol>	Note	See submission point 10.1
10.4	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 14.1	<p>Oppose</p> <p>Insert provisions for surveillance, public awareness, intelligence, compliance, and networking to reduce marine biosecurity risks.</p>		See submission point 10.1
20.14	Marlborough District Council - Jono Underwood	<p>There is an absence of any commentary, or potential programmes, that give affect to the Environment Canterbury’s role in fulfilling its responsibility outlined within the Pest Management National Plan of Action for marine pests.</p> <p>Marine pests such as Sabella spallanzanii and Styela clava are known to be established in the waters</p>	Clarify Environment Canterbury's position with respect to fulfilling its role(s) within the Pest Management National Plan of Action.	Note	See submission point 10.1

of Lyttleton Harbour. There has been decisions made, by the Ministry for Primary Industries (formerly MAF Biosecurity NZ) that eradication of these species will not be attempted nationally. As such, as outlined in the Pest Management National Plan of Action, the regional council is to take a lead role in coordinated decision making. It is not clear either within this Proposal, nor elsewhere, how Environment Canterbury intends to deliver this lead intervention and decision-maker role.

There are links between the Canterbury and Marlborough marine environments primarily via both the recreational vessel traffic and aquaculture industry. These pathways could mean the action or inaction of either MDC or Environment Canterbury can have flow-on effects on the decisions that are made in either region. There are some perceived uncertainties about the roles for pathway management (and implementation of those roles) of between central government and regional government outlined within the Pest Management National Plan of Action. This uncertainty should not preclude implementation of all the roles when the majority or regional councils around the country seem to have taken a much clearer view on the Pest Management National Plan of Action.

20.15

Marlborough District Council - Jono Underwood

See submission point 20.14

Insert provisions to recognise the risks of the established marine pests within Canterbury, and the known links to Marlborough, MDC

See submission point 10.1

			would like to see a degree of operational implementation for marine biosecurity occur within in the Canterbury region. This could be documented within the RPMP, but could also be explained outside of this regulatory tool.		
29.2	Howard, Ted	<p>Rather than delving deeply into specifics at this late stage, I would like to see ECan engage with organisations like Te korowai o te tai o Marokura and the Kaikoura Marine Guardians to develop approaches to marine biosecurity that are as effective as possible within the constraints present.</p> <p>Flagging such an intention in this strategy may be all that is required at this stage.</p> <p>And I am very conscious of the additional stress that the earthquake has placed on many people and organisations who were already stretched thinly.</p>	<p>Insert provision in the RPMP to flag and intention to engage with organisations like Te korowai o te tai o Marokura and the Kaikoura Marine Guardians to develop approaches to marine biosecurity that are as effective as possible within the constraints present. Engagement outcomes may result in:</p> <ul style="list-style-type: none"> <li>• A Pathway Management Plan for marine areas.</li> <li>• Requests to shipping operators to dump any ballast water they may need to beyond the continental margin when safety issues make that a reasonable possibility.</li> <li>• Anchor vessels that might be carrying organisms offshore and away from reef areas where possible.</li> <li>• Have reasonable procedures to keep hulls free of invasive species, particularly for vessels coming from areas of known infestation of unwanted organisms (locally or internationally).</li> <li>• The complexity of the issues we face is significant, and new technology will allow us to develop ever more</li> </ul>	Note	<p>We agree that engagement with Te Korowai o te Tai o Marokura and the Kaikoura Marine Guardians is needed to establish what is required to support the marine environment in the area. Further discussions with other parties, including the Ministry for Primary Industries (MPI), Department of Conservation and others is also required before outcomes can be identified.</p> <p>We agree that marine biosecurity is a function of regional councils, and we note that council has had limited input into this area to date. Most of the marine control has been undertaken in collaboration with the Ministry for Primary Industries (MPI).</p> <p>Staff would benefit from receiving further evidence and discussion at the hearing. However, we anticipate at this stage that a scoping exercise of marine biosecurity management in Kaikoura and wider Canterbury is required initially.</p>

			effective strategies over time.		
Number	Name	Submission	Relief	Staff Recommendation	Reasons
6.1	Ross, Fraser Bell	sycamores are now becoming a serious problem in many bush and natural areas, throughout the South Canterbury foothills and lower country' including along several riverbeds as well. The seeds from such stands are wind blown and travel some distance away from the parent trees. Much time and effort is needed to deal with, and remove, sycamores from stands of local bush by dedicated volunteers. So a much more concerted effort is needed to control the seed source for sycamore. The propogation, sale and distribution of sycamore should be banned absolutely and included in this Plan to deal with the escalating sycamore spread on both public and private land.	Insert provisions to prohibit the propogation, sale and distribution of sycamore.	Reject	Sycamores are widespread throughout Canterbury and it would not be achievable to manage these across the region. Sycamore is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
6.2	Ross, Fraser Bell	Chilean Flame creeper - this red flowered climber has become established in several natural areas on both public and private land. And is a particularly difficult weed to control and eliminate. But it does need to be controlled and eliminated, if possible and should be included in the Programme for weeds.	Insert provisions for Chilean flame creeper in the site-led programme.	Reject	Staff do not have details of distribution or extent of Chilean flame creeper in Canterbury. This is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
6.3	Ross, Fraser Bell	Hawthorn: this troublesome weed is widespread in several local bush areas, including Kakahu Bush, and needs to be firmly controlled as its fruit and seeds are spread widely by birds.	Insert provisions to control hawthorn.	Note	Staff do not have details of distribution or extent of Hawthorn in Canterbury. This is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as

		Much time and effort id being spent to control and limit the spread of this highly invasive plant pest.			required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements are provided.
6.13	Ross, Fraser Bell	Privet has recently become established in one or our bush areas which I help maintain	Insert provision to keep it under surveillance and records to be kept of the sites where it has been found and documented for future reference	Note	The submitter has not provided a specific species of Privet. However, Chinese privet is currently listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities.
6.15	Ross, Fraser Bell	Spanish Heath - a persistent weed on the hill country here and its spread is aided by pigs as it germinates readily on pig rooted areas. So control of wild pigs should be part of the attack to eliminate or reduce this persistent weed pest.	Insert provisions to eliminate or reduce Spanish Heath, including control of wild pigs	Reject	Staff consider Spanish heath to be widespread throughout Canterbury, and an eradication or reduction objective would not be achievable. This is currently listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
6.17	Ross, Fraser Bell	"DOC's Dirty Dozen" include these if they are found in the Canterbury Region;	Insert provisions to include any organisms listed on DOC's Dirty Dozen list	Note	Many of DOC's dirty dozen are included in the PRPMP, where these are not included it is because these organisms are widespread in Canterbury, or have not been reported as an issue.
6.18	Ross, Fraser Bell	needle grass, nassella, pampas and other invasive grassland species need to be subject to firm control or eradication programmes;	Insert provisions to control or eradicate needle grass, nassella, pampas and other invasive grassland species	Note	There is not enough detail in this submission point to comment on including the organisms noted in the eradication programme. There are many types of invasive grasses listed in the RPMP, refer to table 3 for details.
6.19	Ross, Fraser Bell	water weeds need to be included as well;	Insert provisions to control water weeds using biological control	Reject	It is unclear what specific water plants the submitter is referring to.

6.20	Ross, Fraser Bell	rooks, feral cats, stoats and possums need continuing control. ECan is undertaking pest control work at Kakahu Bush and beyond for the benefit of the long tailed bat and native bird species generally. Such essential pest control work is fully appreciated and must be continued for the longer term to ensure the survival of many native species.	Insert provisions to ensure rooks, feral cats, stoats and possums continue to be controlled	Note	Rooks and possums are proposed to be controlled in the RPMP, and the council will be working with the Department of Conservation on Predator Free 2050. However, the council does not have the capacity to control feral cats and stoats on a region-wide basis. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
12.6	McNeill, Steve	b) Priorities. (ii) There does not appear to be a high priority placed on mustelid and rat control across Canterbury, yet native species including ground nesting birds continue to be at risk across the region,	Oppose  Insert provisions to control mustelids and rats across Canterbury	Reject	Controlling rats and mustelids at regional scale would take considerable resources. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
14.2	Loxton, Gavin	page 102 , Support , Inclusion of Horehound - <i>Marrubium vulgare</i> should be included on the observe list. This is an economically important plant to farming in the dry east coast regions of New Zealand. From 1st July2017- July2019, a biocontrol program will be operating, to introduce 2 biocontrol agents from Australia to control horehound.	Support  Insert provisions to include Horehound - <i>Marrubium vulgare</i> on the observe list [Organisms of Interest]	Reject	Horehound is widespread throughout Canterbury, the Organism of Interest requirement for undertaking surveillance would require an increase in resource. Staff note the development of biological control for this organism.
18.1	Frank, Hermann	Sycamores ( <i>Acer pseudoplatanus</i> ) become more and more of a problem in regard to biodiversity and might become a problem in farming or forestry, too. This can be seen in many places, also outside our region like in Dunedin. They outcompete	Insert provisions to include sycamores in 'sustained control programmes' and also in 'site-led programmes'.	Reject	Sycamores are widespread throughout Canterbury and it would not be achievable to manage these under sustained control. Sycamores are currently listed as an Organism of Interest and will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if

		<p>native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems, bare land. Over time they form a dense monotone structure. They also spread easily by their wind-borne seeds. They are very difficult to control when they are at the stage of trees. They would need to be included in 'sustained control programmes' and also in 'site-led programmes'.</p>			<p>detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
18.8	Frank, Hermann	<p>Stonecrop (<i>Sedum acre</i>): This invasive pest plant can tolerate very extreme conditions, but does not like competition by taller vegetation. This means it mostly occupies areas with dry, stony or rocky conditions. However, these places are often habitat for rare plant communities with threatened plants e.g. limestone habitats, rocky outcrops, coastal and shingle sites. As the stonecrop can form very large dense mats, it outcompetes those vulnerable plants. The species needs to be included in 'site-led' programmes.</p>	<p>Insert provisions to include stonecrop in 'site-led' programmes.</p>	Note	<p>Site-led programmes (if regulation is identified as required) could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
18.11	Frank, Hermann	<p>The 'Sustained Control Programme' should include sycamores as outlined above. The GNR should apply and landowners shall eliminate infestations on their land within 100 metres of an adjoining property boundary and eliminate infestations that cover up to 500 square metres in area on the land that they occupy. Rationale behind this that sycamore seeds spread easily by wind dispersion.</p>	<p>Insert provisions to include sycamores in the 'Sustained Control Programme', the GNR should apply and landowners shall eliminate infestations on their land within 100 metres of an adjoining property boundary and eliminate infestations that cover up to 500 square metres in area on the land that they occupy.</p>	Reject	<p>See submission point 18.1</p>

19.1	Ashton, Jeni	The significance of this Canterbury podocarp forest and its decline due to plant pests needs to be addressed in the Canterbury regional management plan. I wish for the plant pests especially old man's beard and Himalayan honeysuckle to be targeted for removal in Peel Forest Scenic Reserve.	Insert provision in the RPMP to remove old man's beard and Himalayan honeysuckle from Peel Forest Scenic Reserve	Reject	Staff acknowledge this request, but note that this is a Department of Conservation responsibility, as the site is located at Peel Forest Scenic Reserve.
27.2	Taylor, R E	The pest species list must include sycamore and cotoneaster, might usefully include ash and alder in wetlands.	Oppose  Insert provisions in the RPMP to include sycamore and cotoneaster and ash and alder in wetlands	Reject	Insufficient information has been provided to consider the addition of these organisms into the RPMP. Staff note that Sycamore, wild cotoneaster, and ash are currently listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
31.1	Te Tihi o Rauheia Hanmer Springs Conservation Trust - Chris Hughey	I may have missed it but do you have Himalayan Balsam in the Canterbury Regional Pest Management Plan.  We have it here in Dog Stream, Hanmer Springs. My concern is that it will eventually make it to the Waiau River and infest all wet areas east to the sea.  We are struggling to control it.	Insert provisions to control Himalayan Balsam	Note	We note that Himalayan Balsam is widespread throughout Canterbury. This is currently listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
35.2	Forest and Bird - Tony Doy	This species [Sycamore Acer pseudoplatanus] has become more and more of a problem in regard to biodiversity and might become a problem in farming and forestry, too.	Insert provisions in the RPMP to include Sycamore under 'Sustained Control' or 'Progressive Containment', in addition to that also 'Siteled'.	Reject	Sycamores are widespread throughout Canterbury and it would not be achievable to manage these under sustained control or progressive control programmes. Sycamores are currently listed as an Organism of Interest and this will be watch-listed for

		<p>This can be seen in many places within Canterbury. They out-compete native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems and bare land. Over time they form a dense monotone structure. They are very difficult to control when they are at the stage of trees. This is a similar situation to the wilding pines in the Mackenzie area.</p>			<p>ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
35.4	Forest and Bird - Tony Doy	<p>Stonecrop (Sedum acre): This invasive pest plant can tolerate very extreme conditions, but does not like competition by taller vegetation. This means it mostly occupies areas with dry, stony or rocky conditions. However, these places are often habitat for rare plant communities with threatened plants e.g. limestone habitats, rocky outcrops, coastal and shingle sites. As the stonecrop can form very large dense mats, it out-competes those vulnerable plants. The species needs to be included in 'site-led' programmes.</p>	<p>Insert provisions in the RPMP to include stonecrop in 'site-led' programmes.</p>	Reject	<p>Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
36.1	Kennedy, Anne	<p>Tree lucerne, spur valerian and polypodium have become plant pests.</p> <p>I would like to see tree lucerne treated in a similar manner to broom.</p>	<p>Insert provisions to control tree lucerne in a similar manner to broom</p>	Reject	<p>Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
36.2	Kennedy, Anne	<p>Tree lucerne, spur valerian and polypodium have become plant pests.</p> <p>Spur Valerian has become a serious threat to the rocky outcrops and open</p>	<p>Insert provisions to control spur valerian in the same manner as Old Mans Beard.</p>	Accept in part	<p>Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration /</p>

		spaces on the Port Hills and Bank Peninsula and needs to be treated in the same manner as Old Mans Beard.			consultation on funding arrangements is provided. Please note that staff recommend including spur valerian in the Organisms of Interest list, this will watch-listed for ongoing surveillance or future control opportunities.
36.3	Kennedy, Anne	Tree lucerne, spur valerian and polypodium have become plant pests.  Poly podium is also taking over the Port Hills and a method of dealing with this invasive plant needs to be found.	Insert provisions to deal with poly podium	Reject	Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
39.3	Summit Road Society Inc. - John Goodrich	We want spur valerian ( <i>Centranthus ruber</i> ) and tree lucerne ( <i>Cytisus proliferus</i> ) to be added to the list of pests to be dealt with by sustained control.	Amend provisions to add spur valerian ( <i>Centranthus ruber</i> ) and tree lucerne ( <i>Cytisus proliferus</i> ) to the list of pests to be dealt with by sustained control.	Accept in part	Staff do not have enough information regarding spur valerian to add this to the sustained control programme, tree lucerne is considered widespread in Canterbury and not suitable to be managed by sustained control. Site-led programmes could be considered (if regulation is necessary) if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.  Staff are recommending that spur valerian is included in the Organisms of Interest list, this will watch-listed for ongoing surveillance or future control opportunities.
40.1	Meridian Energy Limited - Andrew Feierabend	Meridian Energy Ltd submits that Lagarosiphon Major be upgraded from a Organism of Interest (Ool) listed on page 102 in Appendix 2 of the Draft Proposal for the Canterbury Regional Pest Management Plan 2017-2037 - to a pest in Table 3 of this consultation document,pages 14-16.  Meridian Energy considers that	Oppose  Amend provisions to upgrade Lagarosiphon from an Organism of Interest to the progressive containment programme, changes would need to be made to Table 11 (progressive containment), Table 32 (monitoring objectives),Table 34 (cost/benefit analysis), Table 35 (	Accept in part	Staff accept that council has a role in controlling the spread of lagarosiphon in lakes in Canterbury. Staff do not consider progressive containment achievable for the council within current resourcing and budgets. However, we recommend that site-led programmes are inserted in the PRPMP to prevent the spread of lagarosiphon from known locations (Lake Benmore and Lake Aviemore) and to exclude this organism from lakes where it is not present.

Lagarosiphon Major meets the current Pest Management Plan threshold for classification as a pest being:  
"....capable of causing adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori, their culture, and traditions and their ancestral lands, waters, sites whahi tapu and taonga.

For consistency purposes Meridian Energy Ltd considers this approach should be adopted given that Lagarosiphon Major is listed as a pest in the Otago Regional Pest Strategy. Meridian Energy and Land Information New Zealand (LINZ) make a significant financial commitment annually to control this organism to the Waitaki Lake System. Lagarosiphon Major is managed within Lake Benmore and Aviemore currently but there is a reasonable risk that it could become more widely spread throughout the Waitaki Lake system or inadvertently spread to other natural Canterbury lake systems. This would be a major setback for lake ecology in Canterbury.

The focus should be on containing the organism within the current boundaries of where it has spread.

Given the significance and consequences of the spread Lagarosiphon Major in the context of the Canterbury Region it would seem reasonable that the regional community contributed to a portion of the containment costs of this

beneficiaries and exacerbators ), Table 36 (funding).

Staff recommend that the following is added to table 30:

Lagarosiphon is a submerged, bottom-rooted perennial, which can form monospecific growths up to five metres tall upon reaching the water surface. It propagates through stem fragments being carried on water currents, boats, aquarium and pond escapes and deliberate planting. This plant is a potential threat to the aquatic environment because it forms dense, monospecific colonies. These, by definition, exclude other parts of the aquatic ecosystem, and it further slows water and wave movement and causes local deoxygenation. While most slow moving water ecosystems are already heavily modified in New Zealand, it still represents a threat to the remaining biodiversity in these ecosystems.

Staff recommend that the following is added to plan objective 20:

For each site in the Canterbury region listed in Appendix 3 sustainable control, where present:

- (i) Spartina;
- (ii) Broom;
- (iii) Gorse;
- (iv) Possum;
- (v) Lagarosiphon (sites 1 and 2 of Appendix 3A)

to avoid, mitigate or prevent damage to the specific values particular to each site.

For each site, the first 10 years of the Plan's operation will result in the:

- (i) The area of spartina being reduced by 50%;
- (ii) The extent of broom being reduced by 10%; (iii) The extent of gorse being reduced by 10%;

introduced pest.

(iv) The number of possums being reduced to 5% Residual Trap Catch (RTC);

(v) Prevention of the spread of Lagarosiphon from locations 1 and 2 of Appendix 3A.

Staff recommend that the following plan objective is added:

**Plan Objective 21**

Over the duration of the Plan, for sites 3 - 15 of Appendix 3B, preclude the establishment of lagarosiphon, to prevent damage and adverse effects to biodiversity and environmental values at these sites.

**Principal measures to be used**

Environment Canterbury will take a lead role in preventing the establishment of lagarosiphon in sites 3 – 15 of Appendix 3B. Council inspection, advocacy and education described in section 5.3 of the Proposal will be used by Environment Canterbury to achieve Plan Objective 21.

Staff recommend that the following Appendices are added:

Appendix 3A Lagarosiphon Sites

1. Lake Benmore and the tributaries that flow into it
2. Lake Aviemore and the tributaries that flow into it

Appendix 3B Lagarosiphon Sites

3. Lake Tekapo and the tributaries that flow into it
4. Lake Alexandrina and the tributaries that flow into it
5. Lake McGregor and the tributaries that flow into it
6. Lake Pukaki and the tributaries that flow into it

					<p>7. <u>Lake Ruataniwha and the tributaries that flow into it</u></p> <p>8. <u>Lake Ohau and the tributaries that flow into it</u></p> <p>9. <u>Lake Middleton and the tributaries that flow into it</u></p> <p>10. <u>Lake Waitaki and the tributaries that flow into it</u></p> <p>11. <u>Lake Heron and the tributaries that flow into it</u></p> <p>12. <u>Lake Clearwater and the tributaries that flow into it</u></p> <p>13. <u>Lake Camp and the tributaries that flow into it</u></p> <p>14. <u>Lake Coleridge and the tributaries that flow into it</u></p> <p>15. <u>Lake Pearson and the tributaries that flow into it.</u></p>
42.1	Ashburton District Biodiversity Working Group - Bert Hofmans	<p>We oppose the exclusion of Tree Lupin as a pest.</p> <p>There is no mention in the CRPMP of the Tree Lupin. During the last 8 - 10 years there has been a rapid spread of this large Lupin species in the lowland rivers of the Ashburton District and it is now appearing in the higher reaches of the alpine rivers, the Rakaia and Rangitata. Tree lupin is also a weed of coastal habitats. It competes with native plants on the narrow coastal dunes, low coastal banks, dongas and gravel pits (Davis, M, 2014. Native Remnants of the Mid-South Canterbury Coast, Canterbury Botanical Society Journal 45.)</p> <p>The long lasting seed is spread as pods dry and explode, spreading seeds in the immediate vicinity. Its</p>	<p>Oppose</p> <p>Insert provisions to declare Tree Lupin a pest due to its "adverse effects on the environment" and that a Sustained Control Programme be included for high value rivers.</p>	Reject	<p>Controlling tree lupin at the regional scale would take considerable resources. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>

		<p>ability to grow in riverbeds, on sandy beaches and other difficult sites, means control is not straightforward. Immediate efforts are needed to control the spread into ecologically sensitive areas.</p> <p>Stable, weed covered islands provide cover for mammalian predators of the birds that nest on the rivers, and minimise the site selection options for endangered bird species such as Black Billed Gulls, Black fronted Terns, Banded Dotterel, Wrybill, Pied Oystercatcher, Pied Stilt and Black Stilt.</p>			
42.2	Ashburton District Biodiversity Working Group - Bert Hofmans	<p>We oppose the exclusion of False Tamarisk from the list of organisms to be controlled under a Site-led Programme. False Tamarisk is another weed of the river beds. It has not yet become widespread but has the potential to, causing similar adverse effects. Prompt action will prevent the need for expensive control measures. The seed is not long lived so timely control measures might prevent further spread and costly intervention in the future.</p>	<p>Oppose</p> <p>Insert provisions to add False Tamarisk to the list of organisms to be controlled under a Site-led Programme.</p>	Reject	<p>False tamarisk is widespread, having quickly colonised braided riverbeds over the past 20 years. In order to consider a site-led programme, detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would be required.</p>
42.6	Ashburton District Biodiversity Working Group - Bert Hofmans	<p>Sycamore is one of the worst threats to Ashburton District's native forest areas. Ashburton District has very small areas of remnant native forest. These remnants are under serious threat from Sycamore spread. Allowed to spread unchecked the Sycamore will eventually shade out native forest species.</p> <p>Sycamore is prevalent in Staveley</p>	<p>Insert provisions to establish a site-led programme in consultation with Alford Landcare Inc, to determine the worst infestations, landowner responsibility and a control programme.</p>	Reject	<p>Further information is required before a site-led programme could be considered. Sycamores are widespread throughout Canterbury and it would not be achievable to manage these across the region. Sycamore is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for</p>

		<p>campsite bush, Taylors Stream area (part of Hakatere Conservation Park) and Alford Forest.</p> <p>Unlike the campaign to reduce wilding pine spread where access is relatively easy on grassland, eradicating Sycamore in forested areas is much more difficult, hence the need to stop the spread now.</p> <p>Department of Conservation own most of the land that the Sycamores have spread to.</p> <p>Alford Landcare Inc. based at Staveley, has been recently been formed to co-ordinate individual programmes of pest control of animal and plant pests. It has no resources other than individual's labour. It would be willing to work in with an ECAN control program for Sycamores.</p>			<p>the programme, and consideration / consultation on funding arrangements is provided. We can work with Alford Landcare Inc outside the RPMP process to discuss progressing this request.</p>
45.2	Predator Free New Zealand Trust - Rebecca Bell	<p>We are concerned that the Good Neighbour Rules do not apply to possums (Table 3, p14). We believe that a land occupier should be required to keep a minimum of 10% residual catch rate within 500m of their boundary to protect production and indigenous and biodiversity values.</p>	<p>Insert provisions for possums requiring land occupiers to keep a minimum of 10% residual catch rate within 500m of their boundary to protect production and indigenous and biodiversity values.</p>	Note	<p>The control undertaken as part of the site-led possum programme on Banks Peninsula is delivered by the council and a good neighbour rule is not required at this time.</p>
50.1	Conway Flat Biodiversity Group - Peter Handyside	<p>I support the inclusion of feral pigs as Ool (appendix 2) but propose they also be included in Part 6.5 Pest to be managed under site lead programs for the Hawkswood Range. There is a big economic impact on my farming business from large feral pigs populations on neighbouring farms</p>	<p>Insert provisions to manage feral pigs in a site led programme for the Hawkswood Range</p>	Reject	<p>A site-led or non-RPMP programme could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>

		<p>spilling over onto my property. . Our groups research also shows high feral pig numbers have served biodiversity impacts (prevent native regeneration). It is reconsidered that recreational hunting does not control pig numbers. We have shown that a community approach is needed and helicopter shooting is cost effective and successful. A property occupier rate could be used to fund a helicopter shoot every 4-5 years.</p>			
64.3	Banks Peninsula Conservation Trust - Maree Burnett	<p>The impacts of feral deer on biodiversity are well known. For much the same reasons as apply to feral goats, there would be great public benefit in eradicating feral deer. [See submission point 64.1]</p>	<p>Insert provisions to include feral deer in the list of organisms declared as pests. Changes required are specified below</p> <p>Insert the following into table 3:</p> <p>Common name: Feral deer: red (including hybrids, fallow)</p> <p>Scientific name: Cervus elaphus, Dama dama</p> <p>Primary programme: Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)</p> <p>Insert feral deer name details (above) into table 8.</p> <p>Insert into table 9, a description of and discussion about feral deer, consistent with the rest of the table, and consistent with the comments made in this submission.</p>	Reject	<p>Staff consider that an objective for eradication would be unachievable. However, we are happy to further discuss Banks Peninsula Conservation Trust's aspirations for the management of feral deer. Staff also note that an objective for feral deer has not been included in the submission, and would benefit from clarity on this through the hearings.</p>
64.4	Banks Peninsula Conservation Trust - Maree Burnett	<p>See submission point 64.1</p>	<p>Amend Appendix 2 on page 102 by adding the words "(outside the</p>	Reject	<p>See submission point 64.1</p>

			Banks Peninsula Ecological Region identified in Map 10 of Appendix 3”) after the references to feral goats and feral deer.		
74.4	Federated Farmers - Lynda Murchison	Federated Farmers opposes the removal of ragwort, nodding thistle and variegated thistle from the proposed RPMP. These are key agricultural pest plant species with a long history of pest management regulation across New Zealand. Federated Farmers understands that compliance activity for these species has been relatively low in recent times, leading to their proposed removal from the RPMP. Instead of the complete removal of these species from the RPMP, Federated Farmers proposes their inclusion in the Sustained Control programme with boundary control rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint. This would remove the need for costly annual inspections but allow the continued benefit of boundary rules when required. This type of ‘upon complaint’ programme is successfully run in the Wellington region.	Oppose  Amend provisions in the RPMP to include ragwort in the sustained control programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint.	Reject	Staff currently receive very low numbers of complaints regarding the boundary control of ragwort. This is not proposed to be included in the RPMP as it is very widespread and being effectively managed by occupiers to prevent adverse impacts on production values. To include this in the RPMP would require setting an objective to require either a reduction, or for the population or distribution to remain at static levels, and requires monitoring resource to ensure this is effective.
74.5	Federated Farmers - Lynda Murchison	See submission point 74.4	Oppose  Amend provisions in the RPMP to include nodding thistle in the sustained control programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be	Note	Staff currently receive very low numbers of complaints regarding the boundary control of nodding thistle. This is not proposed to be included in the RPMP as it is very widespread and being effectively managed by occupiers to prevent adverse impacts on production values. To include this in the RPMP would require setting an objective to require either a reduction, or for the population or distribution to remain at static levels, and requires

			implemented only upon complaint.		monitoring resource to ensure this is effective.
74.6	Federated Farmers - Lynda Murchison	See submission point 74.4	Oppose  Amend provisions in the RPMP to include variegated in the sustained control programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint.	Note	Staff currently receive low numbers of complaints regarding the boundary control of variegated thistle. This is not proposed to be included in the RPMP as it is very widespread and being effectively managed by occupiers to prevent adverse impacts on production values. To include this in the RPMP would require setting an objective require either a reduction, or for the population or distribution to remain at static levels, and requires monitoring resource to ensure this is effective.
74.7	Federated Farmers - Lynda Murchison	The recent incursion of velvet leaf is recognised as a considerable risk to the arable and pastoral farming industries of the Canterbury region. Federated Farmers is aware that the management of the velvet leaf incursion is still being run by the Ministry for Primary Industries but given the longevity of the seedbank it is inevitable that the ongoing control will become the responsibility of regional councils. Because the RPMP document lasts for 20 years, it is short-sighted not to include this species in the document. Other Regional Councils such as Waikato and Wellington have proposed to include the species despite the response still being run by MPI.	Insert provisions in the RPMP to add velvet leaf to the Eradication category of the proposed RPMP, with an indication that control is currently funded and coordinated by MPI.	Reject	Staff acknowledge the adverse effects posed by velvet leaf. There are approximately 500 farms that have been identified to have velvet leaf, it is anticipated that costs to include this in the eradication programme in the RPMP could be very significant and a cost benefit analysis would need to be undertaken, should the hearing panel wish to pursue this. Staff consider that this organism could be well suited to a non-regulatory on-farm-biosecurity approach.
76.1	Christchurch International Airport Ltd - Kate McKenzie	The risk of bird strike on an airport relates to the level and form of bird activity both within the boundary of an airport and in the surrounding areas. Birds attracted to land uses around airports can migrate onto the airport itself or across flight paths, increasing	Oppose  Amend the RPMP to include Rock Pigeon under Section 6.4 of the CRPMP, as a pest to be managed under a sustained control programme.	Reject	Staff do not consider that it would be possible to achieve an objective of sustained control for rock pigeons as they are widespread throughout New Zealand.

the risk of collisions.

The population explosion [of rock pigeons] being experienced at the Airport has been exacerbated by an increase in roosting opportunities in the CBD and a significant land use change to intensive dairy farming in the Eyrewell area. The intensive dairy farming is providing substantial feeding opportunities for these pigeons, which have a preference for grain and are targeting recently sown cereal crop paddocks and also cereal silage being fed out to animals. A similar land use change is now occurring in the Canterbury Plains south of the Waimakariri River, due to recent irrigation schemes which have provided further opportunity for intensification, which explains the increased flight path variation observed at the Airport.

It is CIAL's view that the pigeon population is widespread, and while a reduction in numbers would be ideal, the population is at a level that "sustained control" is a pragmatic management option for this species.

CIAL considers that this species presents a significant risk to the safety of aircraft using the Airport, and it is not possible for CIAL to manage the population by itself. The management (and preferably reduction) of the population can only be achieved by proactive control by removing roosting opportunities and targeting feeding sites.

76.2	Christchurch International Airport	Canada Geese are of particular	Oppose	Accept	Staff recommend that Canada Goose is included on
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	Ltd - Kate McKenzie	<p>interest to CIAL. To date there have been no Canada Geese bird strike events recorded at the Airport, however they have been recorded on the airfield and are regularly sighted at water bodies within 3 nautical miles of the airfield. There have also been a number of near strikes reported to CIAL/Air Traffic Control by pilots operating from CIA. Due to their size and flocking nature, these birds pose a significant risk to aircraft.</p> <p>CIAL is actively working with Environment Canterbury on the development of a collaborative approach to managing Canada Goose numbers in the greater Christchurch area through the development of a 'Canada Goose Management Plan'. We will continue to pursue this as a management method, however to date there has been insufficient progress with this non-statutory control method to satisfy CIAL that this will be completed in time to proactively manage the population. At the very least, this species should be recorded as an Organism of Interest, as without proactive management the population could increase considerably during the 20 year life of the proposed CRPMP.</p>	Insert provisions in the RPMP to include Canada Goose as an Organism of Interest in Appendix 2 of the Canterbury Regional Pest Management Plan.		the Organism of Interest list, due to the risk and severity of a bird strike event and also due to council involvement in the joint partnership on Canada Goose. However, we would recommend that action is undertaken through the joint Canada Goose Management Plan, rather than through the RPMP.
76.3	Christchurch International Airport Ltd - Kate McKenzie	In the event that the non-statutory management method currently being explored (the Canada Goose Management Plan) does not proceed before 2018, CIAL seeks that the Canada Goose is included under Section 6.3 of the CRPMP, as a pest to be managed under a progressive containment programme.	Oppose  Insert provisions in the RPMP to include Canada Goose in the progressive containment programme, subject to the Canada Goose Management Plan not proceeding before 2018.	Reject	Staff anticipate that inserting a pest in the RPMP subject to an joint management plan not commencing would not provide certainty to whether this Canada Goose is classified as a pest or not. This trigger point is well before the next review point (2027). Staff also consider that the joint management plan is a more effective way to manage this organism rather than through regulatory methods.

76.4	Christchurch International Airport Ltd - Kate McKenzie	<p>The Southern Black-backed Gull is a large gull which has an established population on the Waimakariri River and other braided rivers in Canterbury. The bird poses a significant risk to aircraft due to its large size (approximately 1kg compared to the much smaller and endangered Red-billed and Black-billed gulls) and the proximity of some colonies to the Airport. Southern Black-backed Gulls are also considered a pest bird by many conservation agencies because of their tendency to predate on endangered braided river birds.</p>	<p>Oppose</p> <p>Insert provisions in the RPMP to include the Southern Black-backed Gull as an Organism of Interest in Appendix 2 of the Canterbury Regional Pest Management Plan.</p>	Reject	<p>Staff agree with the submitter that Southern black-backed gulls can impact on biodiversity and could be risk to aircraft. However, staff do not consider it appropriate that this organism is listed in the RPMP in any programme, or the Organism of Interest list due to this being a native species, and also is a Taonga species to Ngai Tahu. While control may be required, this is more appropriately managed through a site-led programme. Consultation with Te Runanga o Ngai Tahu would also be required.</p>
		<p>CIAL has focused control efforts on colonies on the Waimakariri River, and recently has been working with Environment Canterbury to manage these populations, and the control efforts appear to be successful in this area. This demonstrates that the species can be managed effectively through proactive and targeted control, however we are uncertain whether the species is being controlled effectively at a regional level.</p>			
		<p>While coordinated management is successfully occurring in the vicinity of the Airport, further statutory intervention is not considered necessary by CIAL, however if management efforts were to fall away over the 20 year life of the CRPMP, the population in this area could quickly increase. This would have significant biodiversity effects, as well as posing an unacceptable risk to</p>			

		aircraft safety in the vicinity of the Airport.			
77.2	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part the list of organisms of interest in the Plan. LINZ however considers that there a number of other invasive tree weed species that are becoming prevalent, particularly in the Canterbury high country. These include Rowan (<i>Sorbus aucuparia</i>), silver birch (<i>Betula pendula</i>) and White Poplar (<i>Populus alba</i>). LINZ considers these species should be added to the list of organisms of interest in the Plan.</p> <p>LINZ also considers that Russell lupin should be declared as 'pest agent' and subject to controls in the Plan. This is addressed elsewhere in this submission. LINZ considers Russell lupin should therefore be removed from the list of 'organisms of interest'.</p>	<p>Support in part</p> <p>Amend the list of organisms of interest in appendix 2 to include Rowan (<i>Sorbus aucuparia</i>), silver birch (<i>Betula pendula</i>) and White Poplar (<i>Populus alba</i>), and delete Russell lupin (<i>Lupinus polyphyllus</i>).</p>	Accept in part	See submission point 78.6
78.3	Department of Conservation - David Newey	<p>The Director General supports the list of organisms declared as pests. There however also needs to be a category of species that are both pests and have a commercial use. These are "pest agents". Organisms that have a commercial use and are</p> <p>a pest should be classified as a "pest agent" to enable better inclusion and enable rules around controlling the self-seeded offspring of the pest agents. Organisms should include; Douglas fir, Bishops pine, Maritime pine, Ponderosa pine, Radiata pine, and, Russell lupin. Larch species are all invasive, we suggest pest agent status for Japanese larch and any</p>	<p>Support in part</p> <p>Amend provisions to include the following organisms as pest agents, Douglas fir, Bishops pine, Maritime pine, Ponderosa pine, Radiata pine, and, Russell lupin, Japanese larch and any hybrid between Japanese and European larch.</p>	Note	Staff would benefit from further evidence and discussion at the hearing on the matter of controlling the organisms listed as a pest agents. Especially in light of the recently notified National Environmental Standard for Plantation Forestry. The current position of staff is that there would need to be specific conditions for a pest agent rule for wilding conifers.

		hybrid between Japanese and European larch.			
78.4	Department of Conservation - David Newey	The Director-General submits that Brown Bullheaded Catfish are hopefully absent from the Region, however, this species is not covered by either Noxious fish or Unwanted Organism status.	Support in part  Include Brown Bull-headed Catfish (including in Table 5) recognising that the species could be deliberately spread to waterways. Such status would impose an objective of exclusion from the Region for this species.	Accept in part	Staff have identified that Brown bull-headed catfish have been recorded in Kaituna Lagoon in 1997, and also has been recorded in Lake Mahinapua (south of Hokitika). Spread can happen often accidentally, for example in eggs in boat trailers. For these reasons, staff do not consider this organism to be suitable for the exclusion programme. However, staff recommend that this is included in the organism of Interest list, to enable further surveillance, and possibly future control.
78.6	Department of Conservation - David Newey	during recent wilding conifer control work, and staff observations, several tree weed species were recorded that are becoming more prevalent invasive weeds (particularly in the high country). The Director General seeks inclusion of additional tree weed species in the Ool category.	Support in part  Amend the provisions in the RPMP to add the following tree weed species to the Ool category: Rowan ( <i>Sorbus aucuparia</i> ), and silver birch ( <i>Betula pendula</i> )	Accept	We accept that both of these species are particularly weedy, and could warrant surveillance and future control, possibly under a site-led programme (if regulation is required). Staff recommend Rowan and silver birch are added to the Organisms of Interest list.
78.10	Department of Conservation - David Newey	The Director General generally supports the concept of progressive containment and strongly supports the inclusion of wilding conifers. Douglas fir is a particularly invasive wilding conifer. It is recognised as the second most invasive species after Contorta pine. The Director General supports inclusion of European larch but note other larch species are also invasive pests.	Support in part  Insert a section on Table for Douglas fir, and the other main wilding conifer species that are not declared pest organisms. The description would be for "pest agent and adverse effects".  Add Japanese larch and any hybrid between Japanese and European larch with pest agent status to Table 12. Include Banks Peninsula in the Progressive containment programme	Note	See submission point 78.3
78.39	Department of	There are other plant species which	Support in part	Accept	We accept this addition to the Organisms of Interest

	Conservation - David Newey	have been detected from time to time in Canterbury and which would have significant effect is they established here. Including these species as Organisms of Interest would be appropriate and cost effective.	Amend provisions to include Senegal tea ( <i>Gymnocoronis spilanthoides</i> ) and Parrots feather ( <i>Myriophyllum demersum</i> ) in Appendix 2.		list, and propose that the following is added:  <u>Senegal tea* (<i>Gymnocoronis spilanthoides</i>)</u>  <u>Parrots feather* (<i>Myriophyllum demersum</i>)</u>  (the * denotes that these organisms are listed as Unwanted Organisms by the Ministry for Primary Industries)
79.26	Christchurch City Council - Brenda Greene	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 Lagarosiphon major over the entire site of the Christchurch Plains to protect a range of values. Long term, the range of Lagarosiphon can be reduced by eradicating it from the Christchurch Plains. There is potential for Lagarosiphon to spread from the Groyne.	Support in part  Insert the provisions to include Lagarosiphon major to the site-led programme, and insert the description page 75 of the Canterbury Pest Management Strategy 2011-2015 following into Table 30	Accept in part	See submission point 40.1
79.27	Christchurch City Council - Brenda Greene	See submission point 79.26	Support in part  Insert the following into Table 31  Plan Objective 19  For each site.....  V Wild Thyme  VI Lagarosiphon major to avoid,mitigate....being reduced by 50%  (vii) extent of Lagarosiphon major being maintained within its 2011 distribution	Accept in part	See submission point 40.1

			<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.</p> <p>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>		
79.28	Christchurch City Council - Brenda Greene	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>Insert provisions to include feral pigs in the site-led programme and insert the description from page 60 of the Canterbury Pest Management Strategy 2011-2015 following into Table 30</p>	Reject	<p>Feral pigs are included in the Wild Animal Control Act, and the Department of Conservation has the ability to control these organisms using regulation. The council does not have data on the 2011 distribution of feral pigs on Banks Peninsula.</p>
79.29	Christchurch City Council - Brenda Greene	See submission point 79.28	<p>Insert the following into Table 31</p> <p>Plan Objective 20</p> <p>For each site...(iv) possum</p> <p>(v) extent of feral pig on Banks Peninsula being maintained within its 2011 distribution.</p> <p>Principal measure to be used.</p> <p>ECan will take a lead role in bringing about the desired levels of environmental protection on Kaituna Valley on Banks Peninsula.</p>	Reject	See submission point 79.28

			Insert new map in Appendix [map shown in submission]		
79.32	Christchurch City Council - Brenda Greene	<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. Lagarosiphon is an unwanted organism and can be contained (see above).</p>	<p>Insert 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>	Accept in part	<p>Staff do not consider the following to be suitable for including in the Organisms of Interest list, sea lavender, wallflower, pride of madeira, and Tasmania blackwood as they are currently being sold or grown commercially and are likely to be found extensively in urban gardens.</p> <p>Staff do not consider the following to be suitable for including in the Organisms of Interest list, giant hogweed, yellow flag, climbing asparagus, smilax, grey willow, Japanese honeysuckle, pampas, fennel, mouse-ear hawkweed, and nodding Thistle as they are very common and widespread.</p> <p>Staff recommend that sweet reed grass is added to the Organisms of Interest list as it has been identified as an emerging pest plant by other regions. Staff also recommend the addition of spur valerian and pigs ear as we recognise the impact and spread is occurring on Banks Peninsula. Further surveillance is required.</p> <p>Staff also recommend that Mayten is added to the Organisms of Interest list as it not considered to yet be widespread in Canterbury. However, further surveillance is required.</p>
79.33	Christchurch City Council - Brenda Greene	<p>Late additional submission point (received 2 August 2017)</p> <p>To support the addition of pigs ear as an organism of interest, as per our existing submission</p> <p>From an aerial 2012 survey of the northern coast, pig's ear is confined to the NE bays, from Lyttelton Harbour to Le Bons Bay (see Map below). The distribution pattern appears to indicate</p>	<p>Insert the following information after the Table. Pigs ear is a biodiversity and pastoral pest that is easily identified, has a known control method, and support from landowners to control its spread (Fig. 1). It impacts cliffs, a threatened environment of national importance. ECan will work in partnership with agencies and landowners to confirm the distribution of pigs ear on Banks</p>	Accept in part	<p>Staff recommend that pig's ear is included as an Organism of Interest. This will be watch-listed for ongoing surveillance or possible control opportunities. However, RPMP does not detail the specifics of surveillance or any future control for Organisms of Interest.</p>

		<p>wind dispersal from the NW, with the NW facing headlands having dense pigs ear and density reducing as spread occurs inwards towards the bay. In deeper bays, such as Port Levy and Pigeon Bay, there appears to be a possible circulation pattern that reduces the spread into the bay, and instead circulates the seed to the opposite (west) side of the bay. Pigs ear was not observed on coastal cliffs in the SW and SE sectors of Banks Peninsula.</p>	<p>Peninsula, and to develop a pest control programme that limits its spread.</p>		
81.1	<p>QEII National Trust - Alice Shanks</p>	<p>The reason why this Chilean tree is a new weed pest in Canterbury is set out by Dr Murray Dawson in his recent article "Chilean Mayten (Maytenus boaria) – a ticking time bomb?" June 2017. New Zealand Botanical Society Newsletter 128, June 2017. We recommend that female maiten trees be eliminated and male trees adjacent areas of indigenous vegetation or restoration plantings be removed.</p> <p>The new pest plan aims to remove infestations in the early stages. Maiten is an ideal species for this new approach. If this is not achieved soon maiten has the attributes to colonise and dominate both indigenous vegetation and riparian plantings throughout Canterbury.</p> <p>The economic case can be made given the public monies and time invested in fencing covenants and planting riparian and "green-dot" sites, and the</p>	<p>Support in part</p> <p>Insert maiten (Maytenus boaria) to the RPMP as a Progressive Containment Pest species so that female trees can be eliminated and thus the spread contained.</p>	<p>Accept in part</p>	<p>Staff recommend that maiten is added to the Organisms of Interest list to be watch-listed for ongoing surveillance or future control opportunities. This is because the extent and the distribution of maiten is not currently known to the council.</p>

		<p>cost of control if nothing is done now.</p> <p>At the very least maiten needs to be a site-led weed to be eliminated from Banks Peninsula</p>			
81.2	QEII National Trust - Alice Shanks	See submission point 81.8	<p>Support in part</p> <p>Alternative relief if that sought in point 81.8 is not granted, include maiten as a site-led weed to be eliminated from Banks Peninsula.</p>	Note	See submission point 81.8
81.5	QEII National Trust - Alice Shanks	<p>Cotoneaster species are increasing across dryland, limestone and open shrubland ecosystems, all much reduced from their 1840 original cover and now rare in Canterbury. It is a bird-dispersed berry so the increase in birds through predator-control programmes is likely to increase the success of this species at dispersal and establishment. The cost of control is less at this time in its expansion.</p>	<p>Support in part</p> <p>Insert all cotoneaster species to the list as Sustained Control species.</p>	Reject	<p>Cotoneaster is widespread throughout Canterbury it would not be possible to achieve a sustained control objective. Potentially a site-led programme (or programme outside the RPMP) could be considered, detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would be required. Wild Cotoneaster is listed as an Organism of Interest and will be watch-listed for ongoing surveillance and future control opportunities.</p>
81.7	QEII National Trust - Alice Shanks	<p>Late additional submission point (received 31 July 2017)</p> <p>Miles and I wish to expand on our submission at the hearings and speak about the pathways to contain new and emerging weeds (nipping them before the bud) eg hawthorn, mayten, Chilean glory vine, garden escapes pigs ear, cockatoos, willows, and policy around collaboration with other agencies like Doc. And giving effect to the NPPA.</p>	<p>Amend the RPMP to ensure pathways for containing new and emerging weeds (eg hawthorn, mayten, Chilean glory vine, garden escapes pigs ear, cockatoos, willows)</p>	Note	<p>Staff would benefit from further evidence and discussion at the hearing regarding this submission point.</p> <p>However, staff note that hawthorn is listed as an Organism of Interest and will be watch-listed for ongoing surveillance or future control opportunities. Hawthorn is widespread in many parts of Canterbury, having been planted as hedges and ornamental trees and is bird spread.</p> <p>Staff recommend that Mayten is added to the Organisms of Interest list as it not considered to yet be widespread in Canterbury. However, further surveillance is required.</p>

					<p>Staff note that Chilean glory vine has Unwanted Organism status, it is wind spread and there are no verified control methods.</p> <p>Staff recommend the addition pigs ear as an Organism of interest as we recognise the impact and spread is occurring on Banks Peninsula and note that further surveillance is required</p> <p>Staff consider that cockatoos are established on Banks Peninsula, with more than 50 birds recorded. Surveillance has been undertaken in the past. Staff recommend that sulphur-crested cockatoo are added to the Organisms of Interest list, this is to enable ongoing surveillance. Staff recommend the following is added to the Organism of Interest list, in Appendix 2:</p> <p>Common name: Sulphur-crested cockatoo</p> <p>Scientific name: <i>Cacatua galerita</i></p> <p>Willows are considered by staff to be widespread and common, and not suitable for inclusion in the RPMP.</p>
83.1	Air New Zealand Incorporated - Captain David Morgan	<p>Christchurch International Airport Ltd (CIAL) is actively working with Environment Canterbury on the development of a collaborative approach to managing Canada goose numbers in the greater Christchurch area. CIAL has advised Air New Zealand that it is registering its interest of having Canada Geese included in the Canterbury Regional Pest Management Plan Review.</p> <p>Air New Zealand is aware of the increase in Canadian Geese and Rock Pigeon numbers within the Canterbury Region, Christchurch and the environs of Christchurch Airport.</p>	Insert provisions to include Canadian Geese and Rock Pigeon in either progressive containment or sustained control	Reject	<p>Staff do not consider that it would be possible to achieve an objective of sustained control for rock pigeons as they are widespread throughout New Zealand.</p> <p>The council are working in partnership with Christchurch International Airport and others to address the impacts from Canada geese. Staff recommend that Canada goose is included in the Organism of Interest list. However, we do not consider that a regulatory approach is required at this stage.</p>

83.2	Air New Zealand Incorporated - Captain David Morgan	See submission point 83.1	Alternative relief if that sought in point 83.1 is not granted, Air New Zealand recommends that these species are classified as an organism of interest by including these species in appendix 2 of the Proposal for the Canterbury Regional Pest Management Plan 2017 – 2037.	Accept in part	Staff consider that rock pigeons are too widespread to warrant ongoing surveillance and future control. Staff recommend to include Canada goose on the Organisms of Interest list due to the risk and severity of a bird strike event and also due to council involvement in the joint partnership on Canada Goose. However, we would recommend that action is undertaken through the joint Canada Goose Management Plan, rather than through the RPMP.
86.1	Port Hills Trust Board and Mt Vernon Park Management Committee - Howard Keene	<p>Our submission relates 6.4 Pests to be managed under sustained control programme</p> <p>We would like you to amend the list of species required to be cleared to within 10m of a boundary under the Good Neighbour rule to include additional species.</p> <p>Specifically in our case we would like it to include boneseed, banana passionfruit and tree Lucerne. It may be necessary to include other species in other areas.</p> <p>As an example we have spent many days clearing a boundary, but the unoccupied land upslope is a dense thicket of numerous weed species. To require the absentee neighbour to clear only gorse and broom to within 10m of the boundary goes only part of the way to help prevent a complex weed reinvasion of our land from above.</p>	Insert provisions to include boneseed, banana passionfruit and tree Lucerne in the sustained control programme, with a Good Neighbour Rule requiring the species to be cleared within 10m of a boundary.	Reject	<p>Boneseed outside the Port Hills/Lyttelton area is subject to a programme of progressive removal. A Good Neighbour Rule requiring boneseed to be cleared 10 metres from boundaries across the region would not be achievable. This would require significant resource to undertake inspections, and respond to urban complaints. We do not consider that this would assist with achieving the boneseed objective in the RPMP.</p> <p>Banana Passionfruit seed falls almost directly within the extent of the parent plant, spread is predominantly by animals. Therefore, a 10 metre Good Neighbour Rule would not prevent spread. It may be more appropriate to consider a site-led programme for this pest. Site-led programmes could be considered (if regulation is necessary) if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p> <p>Tree lucern is widespread and sold extensively as a perennial forage crop and promoted as a nursery tree for natives, and is not suitable for inclusion in the sustained control programme.</p>
88.1	Forest and Bird - Jen Miller	Sycamore Acer pseudoplatanus has become an increasing problem Its	Support in part	Reject	Sycamores are widespread throughout Canterbury and it would not be achievable to manage these

		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.	Insert provisions in the RPMP to manage Sycamore under the sustained control programme (add to table 3 and section 6.4)		under the sustained control programme. Sycamore is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as being required) could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
88.2	Forest and Bird - Jen Miller	<p>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.</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>Support in part</p> <p>Insert provisions in the RPMP to include tree lupin in site-led programmes 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>	Reject	In order to consider a site-led programme for tree lupin (if regulation is identified as being required), detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would need to be provided.
88.4	Forest and Bird - Jen Miller	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.	<p>Support</p> <p>Retain provisions in the Organisms of Interest as worded</p>	Accept	

88.6	Forest and Bird - Jen Miller	<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>Support in part</p> <p>Insert provisions in the RPMP to include Myrtle rust in the exclusion programme</p>	Reject	<p>Staff note that this is currently being managed under a national incursion response, led by the Ministry for Primary Industries (MPI), this is an Unwanted Organism. Not enough is known at this stage to include Myrtle rust as an exclusion pest. The council would work in an incursion response capacity, alongside MPI, should any incidence of Myrtle rust be identified.</p>
90.3	Johnstone, Robert	<p>There is no place for goats on hill country if they have access to G&amp;B seed heads. My neighbour's once clean tussock higher slopes is now infested in broom caused by escaping goats</p>	<p>Amend the RPMP to ensure that goats are controlled in the hill country</p>	Reject	<p>The Wild Animal Control Act 1977 covers feral goats, and the Department of Conservation has the ability to control these organisms using regulation.</p>
90.6	Johnstone, Robert	<p>The subdivision of the various pests into one of the 5 programmes seems to be pretty much a continuation of previous policy and is sensible and supported but I do not see Nodding Thistle mentioned. This is a mistake and this thistle should be put back on the list particularly if the region (or the property) has a history of small seeds production.</p> <p>That they got away in South Canterbury is really a reflection on the policy of 40 metres from the boundary or road or river and lack of proper enforcement that was undertaken. The weevil is I understand having some effect but it will never exterminate them</p>	<p>Insert nodding thistle on the pest list</p>	Reject	<p>Staff currently receive very low numbers of complaints regarding the boundary control of nodding thistle. This is not proposed to be included in the RPMP as it is very widespread and being effectively managed by occupiers to prevent adverse impacts on production values. To include this in the RPMP would require setting an objective require either a reduction, or for the population or distribution to remain at static levels, and requires monitoring resource to ensure this is effective.</p>
90.7	Johnstone, Robert	<p>I believe that Burdock should be</p>	<p>Insert burdock in the sustained</p>	Reject	<p>Burdock is very widespread, and it would not be</p>

		included in the sustained Control Category. It is a prolific seeder, deep rooted and can get easily established around yards hay barns, sheep camps etc.	control category		achievable to manage it effectively across the region. Burdock is listed as an Organism of Interest and will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
90.8	Johnstone, Robert	Blackberry seems to be omitted as well. What is the reason? It is widespread, or is it too wide spread to cope with? Serious consideration should be give to including this plant.	Insert blackberry on the pest list	Reject	Blackberry is very widespread, and it would not be achievable to manage it effectively across the region. Blackberry is listed as an Organism of Interest and will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
90.15	Johnstone, Robert	<p>Meulambeccia There are many varieties, mostly indigenous. This plant is as voracious and devastating to both native and exotic forests, woodlands and gardens ---arguably much worse than OMB .. It is not on any radar simply because it is an indigenous plant and therefore has special status!.</p> <p>The strategy should be consistent include Meulambeccia along with OMB or delete both . ---They are of equal menace . The fact that one is indigenous is quite irrelevant in my view.</p>	Insert Meulambeccia in the RPMP, consistent with old man's beard.	Reject	Meulambeccia is a native clematis, and does not impact production in the same way that old man's beard does. Staff do not recommend inclusion in the RPMP.

Number	Name	Submission	Relief	Staff Recommendation	Reasons
7.1	BRaid - Sonny Whitelaw	braided rivers are the only ecosystem in the ten broadly targeted areas to have its own set of targets in the Canterbury Water Management Strategy. One of the CWMS targets under 'Natural Character of Braided Rivers' is to implement actions to correct the decline in useable braided river bird habitat. Populations of these bird species are at risk in good part because of introduced predators and weed species. The main invaders are broom, gorse and lupins. There is ample evidence that the Russell lupin is capable of significantly reducing the extent of the shingle areas and the multiple channels or 'braids' that wander through them, which are equally necessary for the birds adapted to feeding in their shallow margins. It is currently being sold as a fodder crop.	Re-classify Russell lupin from an Organism of Interest (p103 of the Proposal for the Canterbury Regional Pest Management Plan 2017-2037) to a Pest Organism, to prevent its sale, propagation, and distribution.	Note	<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council and landowners would be.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>
7.2	BRaid - Sonny Whitelaw	See submission point 6.1	Alternative relief if that sought in point 6.1 above is not granted, re-classify Russell lupin from an Organism of Interest (p103 of the Proposal for the Canterbury Regional Pest Management Plan 2017-2037) to an Unwanted Organism to prevent its sale, propagation, and distribution.	Reject	Granting organisms Unwanted status is managed by the Ministry of Primary Industries.
7.3	BRaid - Sonny Whitelaw	A protocol for the existing use of Russell lupin needs to be well written, rigorously implemented, and equally rigorously policed so that the cost of cleaning up breaches are born by the	Provide for a protocol to manage the existing use of Russell lupin so that the cost of cleaning up breaches are born by the user.	Note	Staff support the development of a code of practice for Russell lupin that sits outside of the RPMP and note that Merino NZ is working to complete a protocol. Staff would find benefit in further discussion through the hearings.

		<p>user. This would not be hard, as the species is such an obvious plant that its spread is readily detected, its origins easily traced, and rates of invasion predictable.</p>			
9.1	Scott, David	<p>Wild Russell lupin (<i>Lupinus polyphyllus</i>) - This species at present is not classified as a 'pest' or 'unwanted organism', but is listed under 'organisms of interest' (Appendix 2, Proposal CRPMMP June 2017). We are aware there may be submissions from other parties to raise it to 'unwanted organism' status.</p> <p>We ask this is not There are several reasons for not including it. These are: that 32 years of pasture trials have indicated its potential as a sheep grazing species; particularly for acid, high aluminium moist soils, under low fertiliser rates; is starting to be taken up by a few farmers; has been in the country for at least a century; has been advocated as a re-vegetation species for half a century; as an economic species for seed production for re-export; has been in the countries horticultural, as seed and plants, for more than a century; it is very much part of the cultural and landscape/tourist appeal</p>	<p>Retain existing provision provisions and classifications for Russell lupin without change.</p>	Note	<p>Staff consider that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. However, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore has been unable to include provisions in the PRPMP.</p> <p>Staff would find benefit in receiving evidence and further discussion through the hearings.</p>
9.1	Loxton, Gavin	<p>Wild Russell lupin (<i>Lupinus polyphyllus</i>) - This species at present is not classified as a 'pest' or 'unwanted organism', but is listed under 'organisms of interest' (Appendix 2, Proposal CRPMMP June 2017). We are aware there may be submissions from other parties to</p>	<p>Retain existing provision provisions and classifications for Russell lupin without change.</p>	Note	<p>Staff consider that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. However, the council is unable to accurately identify the distribution and extent of wild Russell lupin and</p>

		<p>raise it to 'unwanted organism' status.</p> <p>We ask this is not There are several reasons for not including it. These are: that 32 years of pasture trials have indicated its potential as a sheep grazing species; particularly for acid, high aluminium moist soils, under low fertiliser rates; is starting to be taken up by a few farmers; has been in the country for at least a century; has been advocated as a re-vegetation species for half a century; as an economic species for seed production for re-export; has been in the countries horticultural, as seed and plants, for more than a century; it is very much part of the cultural and landscape/tourist appeal</p>			<p>therefore has been unable to include provisions in the PRPMP.</p> <p>Staff would find benefit in receiving evidence and further discussion through the hearings.</p>
14.1	Loxton, Gavin	<p>Page 103, support, That wild russell lupins, remain in the observe list. Report as given, in joint submission with David Scott, Lake Tekapo.</p>	<p>Support</p> <p>Retain provision for wild russell lupins in the observe list [Organisms of Interest]</p>	Note	<p>Staff consider that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. However, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore has been unable to include provisions in the PRPMP.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>
18.6	Frank, Hermann	<p>4.1. is supported with the exception that sycamore needs to be added, preferably under 'Sustained Control' or 'Progressive Containment', in addition to that also 'Site-led'. The species is only listed as 'Ool' in the proposal.</p>	<p>Insert provisions to include Wild Russell lupin <i>Lupinus polyphyllus</i> should be included in this category [Sustained Control or Progressive Containment, in addition to that also 'Site-led']</p>		<p>We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council would be.</p>

		<p>Also, Wild Russell lupin <i>Lupinus polyphyllus</i> should be included in this category.</p> <p>Again, it is only listed as 'Ool', which is not sufficient for this weed species.</p>			<p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>
29.3	Howard, Ted	<p>The other major area of concern is with braided river beds, particularly with Russell Lupins, but with large numbers of other invasive plants that can significantly affect reproductive success of many of our braided river birds and other species (insects, fish and reptiles in particular). Putting some attention to these issues, and developing effective strategies over time via engagement with all stakeholder (perhaps using the Zone Committee structure), would seem to be an effective way forward. And the development of such things typically takes about a decade, by the time people build the trust and understanding necessary to identify shared values and for successful collaboration on developing strategies to achieve shared goals.</p>	<p>Insert provisions to put attention to these issues and develop effective strategies over time via engagement with all stakeholders</p>	Note	<p>We acknowledge the threat that wild Russell lupin poses to braided river environments. Further development of strategies for wild Russell lupins is supported and is planned as part of the wider Biosecurity programme. The first step in this is to understand the current distribution of lupins and the sites are currently infested, at threat of infestation and those that are currently clear of Russell lupin. Following this engagement with stakeholders would provide value input to potential programmes, we acknowledge the suggestion to use the Zone Committee structure and will make inquiries to their interest across the region. Regarding the control of other organisms to support the reproductive success of braided river species, this could be approach in either a programme outside the RPMP, if regulations are not required, or within a site-led programme. To establish a programme (site-led or non-RPMP), detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements would be required.</p>
35.3	Forest and Bird - Tony Doy	<p>Wild Russell Lupin <i>Lupinus polyphyllus</i> could also be included in this [site-led] category as it is also listed as 'Ool', which is not sufficient for this weed species.</p>	<p>Insert provisions in the RPMP to include Wild Russell Lupin under 'Siteled'.</p>	Reject	<p>Site-led programmes could be considered if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
37.1	Crowe, Max	<p>Russell Lupin (<i>Lupinus polyphyllus</i>) should be included in the Pest</p>	Oppose		<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments</p>

		<p>Management Plan as a Pest Agent.</p> <p>Experience from the Lower Ahuriri river shows that this species is an aggressive invader of braided river habitats, thereby altering river bed geomorphology and reducing the available habitat for nesting bird, including threatened species such as wrybill, black fronted tern and dotterel.</p> <p>In order to prevent the species from invading further reaches within the Waitaki District it is important that the current extent of these infestations are mapped, and where practical that site led programmes be carried out.</p>	<p>Insert provisions to include Rusell Lupin (<i>Lupinus polyphyllus</i>) in the Pest Management Plan as a Pest Agent. The current extent of these infestations are mapped, and where practical that site led programmes be carried out.</p>		<p>and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council would be.</p> <p>Staff would find benefit in receiving evidence and further discussion through the hearings.</p>
37.2	Crowe, Max	See submission point 37.1	<p>Oppose</p> <p>Insert provisions to use a progressive containment approach using the boundary and setback rules set by industry best practice to contain Russell lupin infestations (where site led programmes are not practical)</p>	Note	See submission point 37.1
37.3	Crowe, Max	See submission point 37.1	<p>Oppose</p> <p>Insert provisions to include <i>L. polyphyllus</i> in the Exclusion Programme, so that important areas currently free from infestation shall remain clear in the future.</p>	Note	See submission point 37.1
52.7	Ledgard, Nick	Determine the areas where Russell lupin should be included under the Exclusion Programme (no lupins present, and none allowed to enter the area, as well as controlling any that do	<p>Insert provisions in the RPMP to incorporate of points raised in Boffa Miskell / DOC submission relative to Russell lupin being treated as a 'pest agent' with Exclusion Areas.</p>		<p>We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and</p>

		<p>appear).</p> <p>Where Russell lupin is present (outside of the Exclusion Programme area), one of the following two approaches should be taken::</p> <p>a. Site-Led, e.g. upper Rangitata (promote rules to suit current programmes)</p> <p>b. Promote boundary and waterway setback rules that align with that promoted by industry</p> <p>Controlling the further spread of RL should definitely not be put into the 'too hard' basket</p>	<p>Outside exclusion areas, either treat RL under a Site Led initiative or with appropriate set-back rules.</p>		<p>therefore understand what the cost and resource impact to the council would be.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>
68.1	Demeter, Jane	<p>The current proposal that wild russell lupins be on a schedule where they are classed as Objects of Interest (OOI) and subject to Site Management Plans is an inadequate response to a pest that is highly likely to invade high value braided riverbeds. The seeds are long lived and river-bed infestations are almost impossible to remove.</p> <p>There needs to be a buffer zone requirement, via a rule, between cultivated russell lupins and waterways where the buffer distance varies based on the significant of the waterway.</p> <p>Exclusion zones should be drawn up where there is no planting of russell lupins because of the significant biodiversity values at risk. e.g. nearby wrybill nesting.</p> <p>Classifying russell lupins as a Pest</p>	<p>Insert a rule to establish a buffer zone between cultivated russell lupins and waterways where the buffer distance varies based on the significance of the waterway</p>	Note	<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council would be.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>

		<p>Agent with appropriate rules that include buffer requirements and exclusion zones would more appropriately manage this plant that is a pest when established in and around waterways.</p> <p>Your own document 'Analysis of Risk under NPD guidance' supports a higher level of management than currently proposed: "Some in community oppose management, overall costs are low, benefits exceed costs, impacts are known to occur, control measures are available and quality data exists"</p>			
68.2	Demeter, Jane	See submission point 68.1	Insert new rules to establish exclusion zones where there is no planting of russell lupins because of the significant biodiversity values at risk. e.g. nearby wrybill nesting.	Note	See submission point 68.1
68.3	Demeter, Jane	See submission point 68.1	Insert provisions to classify russell lupins as a Pest Agent	Note	See submission point 68.1
74.9	Federated Farmers - Lynda Murchison	Federated Farmers understands that some parties have sought to have russell lupins included in the proposed RPMP. Russell lupins have been proven as a valuable fodder crop to stabilise soils in extremely harsh growing conditions such as those of the MacKenzie country. The nitrogen fixing plants are direct drilled into the soil with no tillage and grow where few other palatable plant species can survive. Lincoln University trials have shown that lupins bind fragile soils which might otherwise be blown or washed away and tolerate aluminium	Opposes RPMP provisions relating to the control of russell lupins, and recommends the adoption of an agreed code of practice that sits outside of the RPMP for the responsible use of russell lupins as a cropping species.	Note	Staff support the development of a code of practice for Russell lupin that sits outside of the RPMP and note that Merino NZ is working to complete a protocol. Staff consider that some regulatory controls are needed to prevent the spread of Russell lupin into braided river environments, but at this time, not enough information regarding the distribution and extent of Russell lupins is available to recommend such provisions. Upon further evidence and discussion at the hearing, staff may be in a position to recommend changes to the RPMP.

		<p>levels toxic to other fodder crops such as lucerne. The trials were part funded by the Ministry for Primary Industries' Primary Growth Partnership and are part of the merino company project to improve merino genetics, health and forage.</p> <p>Russell lupins are a low input fodder species which can conserve fragile soils without the use of irrigation or fertiliser - minimising their environmental impact on sensitive waterways and ground water. Federated Farmers is opposed to their inclusion in the RPMP as the species is extremely widespread and the benefits of any control or management by the Regional Council is questionable.</p>			
77.7	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports the pests to be included under sustained control programmes set out in section 6.3. However, LINZ considers that Russell lupin (<i>Lupinus polyphyllus</i>) should also be included under a sustained control programme.</p> <p>Russell lupin rapidly invades braided river systems, which reduces the available habitat of nesting river birds, including threatened species, and provides cover for predators such as feral cats and mustelids. Dense infestations also cause sand and gravel to build up, altering the morphology of rivers and contributing to flooding and erosion.</p> <p>The distribution of Russell lupin varies through the region. It is absent from a large proportion of the upper</p>	<p>Support in part</p> <p>Insert Russell lupin (<i>Lupinus polyphyllus</i>) as a 'pest agent' to the list of pests to be included in a sustained control programme in table 14, and include a description of the Russell lupin and its adverse effects to section 6.4.</p>	Note	<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council would be. Due to this we are unable to confidently include wild Russell lupin, even as a 'pest agent' (the naturally produced offspring of planted Russell lupin) in the region-wide sustained control programme and understand the resource requirements to implement this programme. We will be able to make further comment on this submission point following the provision of distribution maps from DOC and LINZ.</p>

catchments, but particularly prevalent in the mid catchment areas where it is easily spread. Russell lupin is also commercially planted as a fodder crop, and cultivated to produce seed for export, and the ornamental plant industry. LINZ spends significant funding on controlling Russell lupin in the Tekapo River and Lake Pukaki shoreline to protect biodiversity values.

LINZ considers that Russell lupin should be included in the Plan under a sustained control programme that precludes its establishment in those parts of the region where it does not exist, and requires sustained control elsewhere within a defined containment area with associated boundary and good neighbour rules.

The reasons for this are:

- The recently proposed New Zealand's Threatened Species Strategy. Braided riverbeds are important habitat for 3 species named in the 150 species of priority threatened and at-risk species. These are black stilt, wrybill and robust grasshopper. Russell lupin provides cover for predators as well as physically invading and eliminating habitat used by these species.
- There are new proposals to make large areas of the Mackenzie Basin predator free in line with the Predator Free 2050 programme in order to protect threatened species. Spread of lupin would undermine this work and add

- costs.
- The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places, she highlights the impacts of Russell lupins on threatened native bird species.

The planting of Russell lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, LINZ supports its inclusion as a 'pest agent' in the Plan which enable its planting for commercial use within the defined containment area, but require their wilding progeny outside of plantations to be controlled. In this way, it would be similar to the approach taken to some commercial conifer species in the Plan, such as *pinus radiata* and Douglas fir.

The exact distribution of Russell lupin in the region is uncertain, and therefore the extent of any preferred containment area has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.

An alternative approach to its inclusion in a sustained control programme may be to declare Russell lupin a pest organism in the Plan, with exemptions granted by a Chief Technical Officer for limited plantings to be carried out with conditions. If spread continues or landowners do

		<p>not meet conditions the exemption would be removed. Such conditions could include no planting within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.</p> <p>In addition to its inclusion under a sustained control programme, LINZ supports the inclusion of Russell lupin in a site led programme for the upper Rangitata and Rakaia catchments. This is addressed elsewhere in this submission.</p>			
77.8	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Insert a new objective in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>Over the duration of the Plan:</p> <p>(i) preclude the establishment of Russell lupin populations in the Canterbury region outside of the Russell lupin containment Area to prevent adverse effects to environmental values.</p> <p>(ii) sustainably control Russell lupin to preclude land presently free of, or being cleared of Russell lupin within the Russell Lupin Containment Area (refer Map X in Appendix 3) becoming infested, and to prevent adverse effects on environmental values.</p>	Note	See submission point 77.7

77.9	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Add new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>All occupiers outside the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate all Russell lupin infestations on land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Note	See submission point 77.7
77.10	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Insert new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>All occupiers within the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate Russell lupin within 10 metres of an adjoining property boundary.</p> <p>For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an</p>	Note	See submission point 77.7

			offence under section 154N (19) of the Act.		
77.11	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.7	<p>Support in part</p> <p>Insert new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>Note: This is designated a Good Neighbour Rule</p> <p>All occupiers within the Russell lupin Containment Area shall on receipt of a written direction from an Authorised Person, eliminate Russell lupin infestations on their land within 10 metres of the adjoining property boundary where the occupier of the adjoining property is eliminating Russell lupin infestations within 10 metres of that boundary.</p> <p>For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p>	Note	See submission point 77.7
77.12	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.7	<p>Support in part</p> <p>Amend Appendix 3 Maps, by including map of new Russell lupin Containment Area (DOC and LINZ to supply maps prior to hearing) and make any other consequential changes needed to the plan to address this submission point [submission point 77.7].</p>	Note	See submission point 77.7
77.23	Land Information				

<p>New Zealand (LINZ) - Maurice Dale</p>	<p>LINZ supports the site led programmes set out in section 6.5. However, LINZ considers that Russell lupin (<i>Lupinus polyphyllus</i>) should also be included in site led programmes for the upper Rangitata and Rakaia catchments where it is having significant adverse effects on biodiversity values.</p> <p>The distribution of Russell lupin varies throughout the region. It is absent from a large proportion of the upper catchments, with the exception of the upper Rangitata and Rakaia catchments. LINZ considers a site led programme be included for the management of Russell lupin in this area.</p> <p>The exact distribution of Russell lupin in the catchment is uncertain, and therefore the extent of the area subject to any site led programme, and the goal for reduction of distribution within the first 10 years of the Plan has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.</p> <p>[Further detail supporting this submission point is included in submission point 77.7]</p>	<p>Support in part</p> <p>Insert Russell lupin (<i>Lupinus polyphyllus</i>) as a 'pest agent' to the list of pests to be included in a site led programme in table 29.</p> <p>Amend objective 19 as follows:</p> <p>For each site in the Canterbury Region listed in Appendix 3, progressively control, where present:</p> <p>(i) Cathedral Bells.....</p> <p>(vi) Russell lupin</p> <p>To avoid, mitigate or prevent damage to the specific values particular to each site.</p> <p>For each site, the first 10 years of the Plan's operation will result in the</p> <p>(i) Extent of Cathedral bells being reduced by 30%...</p> <p>(vii) Extent of Russell lupin being reduced by XX%</p> <p>(DOC and LINZ to confirm reduction goal prior to hearing).</p> <p>Amend Appendix 3 Maps, by including maps of new site led programmes for Russell lupin for the upper Rangitata and Rakaia catchments (DOC and LINZ to supply maps prior to hearing).</p> <p>Amend provisions for any other consequential changes needed to the plan to address this submission point.</p>	<p>Note</p>	<p>See submission point 77.7</p>
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78.5	Department of Conservation - David Newey	The Director General supports a list of Organisms of Interest and those organisms currently on the list, except Russell lupin. The Director General seeks a greater action on Russell lupin and seeks it be declared a pest or a pest agent.	Support in part  Reclassify Russell lupin as either a pest or a pest agent. Pest agent would enable rules to control wild Russell lupin as well as allow for some commercial use.		See submission point 78.26
78.26	Department of Conservation - David Newey	<p>The Director General considers Russell Lupin - <i>Lupinus polyphyllus</i> should also be included under a sustained control programme. In coming to this conclusion, we considered three recent initiatives pertinent to our submission. These are:</p> <ol style="list-style-type: none"> <li>1. The recently proposed Threatened Species Strategy. Russell lupins provide cover for predators as well as physically invading and eliminating habitat used by these species.</li> <li>2. There are new proposals to make large areas of the Mackenzie Basin predator free in line with the "Predator Free 2050 programme" in order to protect threatened species. Spread of lupin would undermine this work and add costs.</li> <li>3. The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places, she highlights the impacts of Russell Lupins on threatened native bird species</li> </ol> <p>DOC spends significant funding on</p>	Insert Russell Lupin, <i>Lupinus polyphyllus</i> as a 'pest agent' to the list of pests to be included in a sustained control programme in Table 14.	Note	<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council and landowners would be.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>

controlling Russell Lupin in the Mackenzie Basin waterways, Rangitata River, Rakaia River, Waimakariri River, Waiau and Clarence upper catchments, Ashburton Lakes area and Bealey Valley to protect biodiversity values. Given the effects that it can have on biodiversity values, DOC considers that it should be included in the Plan under a sustained control programme that precludes its establishment in those parts of the region where it does not exist, and requires sustained control elsewhere within a defined containment area with associated boundary and good neighbour rules.

The planting of Russell Lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, DOC supports its inclusion as a 'pest agent' in the Plan which enable its planting for commercial use within the defined containment area, but require their wilding progeny outside of plantations to be controlled. In this way, it would be similar to the approach taken to some commercial conifer species in the Plan, such as *pinus radiata* and Douglas Fir.

The exact distribution of Russell Lupin in the region is uncertain, and therefore the extent of any containment area has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.

The Director General also recognizes the spread mechanisms of this weed species (via water and flooding, sale and deliberate spread of seed, gravel extraction and movement of contaminated gravel to new sites, dispersal via machinery and considers a Regional Pathway Management Plan may also be The Director General also recognizes the spread mechanisms of this weed species (via water and flooding, sale and deliberate spread of seed, gravel extraction and movement of contaminated gravel extraction and movement of contaminated gravel to new sites, dispersal via machinery and considers a Regional Pathway Management Plan may also be useful.

An alternative approach may be to declare Russell Lupin a pest organism, with exemptions granted under the Biosecurity Act for limited plantings to be carried out with conditions. If spread continues or landowners do not meet conditions the exemption would be removed. Such conditions could include no planting within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.

78.27	Department of Conservation - David Newey	See submission point 78.26	Insert a description of the Russell Lupin and its adverse effects to Section 6.4.	Note	See submission point 78.26
78.28	Department of Conservation -	See submission point 78.26	Insert a new objective in Section 6.4	Note	See submission point 78.26

	David Newey		<p>for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>Over the duration of the Plan:</p> <p>(i) preclude the establishment of Russell Lupin populations in the Canterbury region outside of the Russell Lupin Containment Area to prevent adverse effects to environmental values.</p> <p>(ii) sustainably control Russell Lupin to preclude land presently free of, or being cleared of Russell Lupin within the Russell Lupin Containment Area (refer Map X in Appendix 3) becoming infested, and to prevent adverse effects on environmental values.</p>		
78.29	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers outside the Russell Lupin Containment Area as shown on Map X in Appendix 3 shall eliminate all Russell Lupin infestations on land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Note	See submission point 78.26

78.30	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall eliminate Russell Lupin within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Note	See submission point 78.26
78.31	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall eliminate Russell Lupin within 10 metres of an adjoining property boundary.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Note	See submission point 78.26
78.32	Department of Conservation - David Newey	See submission point 78.26	<p>Insert a Good Neighbour rule for areas where Russell lupin is widespread. A 10m distance would be consistent with GNR for similar</p>	Note	See submission point 78.26

			species such as gorse and broom.		
88.3	Forest and Bird - Jen Miller	<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>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 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>	<p>Support in part</p> <p>Amend the RPMP to include Russell lupin in the site-led programme, 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>	Note	<p>We acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage and where possible prevent the adverse effects from wild Russell lupin. At this point in time, the council is unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the council and landowners would be.</p> <p>Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings.</p>

## Comments specific to pest provisions

Number	Name	Submission	Relief	Staff Recommendation	Reasons
20.12	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Nassella tussock. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	Support  Retain the proposed Programme for Nassella tussock.	Accept	
25.11	Rayonier Matariki Forests - Steve Chandler	Plan Objective 15 Page 55: Support	Supports Objective 15	Accept	
25.12	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.16 Page 56: Support	Supports Rule 6.4.16	Accept	
25.13	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.17 Page 56: Oppose in part.  Compliance with this rule is very difficult to achieve for the entire area of a plantation forest, due to accessibility and ability to detect every plant. Nassella tussock removal is feasible on forest boundaries with neighbours and internal access roads/tracks, but 100% removal is not practicable within the forest. As a forest canopy closes tussock plants are suppressed, seeding is reduced and plants may die due to lack of light.	Amend Rule 6.4.17 to require plantation forest owners to control nasella tussock on their boundaries and internal access/roads/tracks only.	Reject	Staff acknowledge the submitter's point regarding nassella tussock control within plantation forests, rather than amend the rule we propose that the Exemption process (see section 8.3) is used to pragmatically approach this issue. Correspondence from Graham Bordout (AgResearch) has confirmed that nassella tussock seed is unlikely to be dispersed far from parent plants in established pinus radiata forest with closed canopy. Boundary clearance would still be required 20 – 30 metres into forestry blocks in addition to any land not forested between the tree line and the property boundary. This criteria may be considered when considering an application for an exemption. Staff would benefit from further evidence and discussion at the hearing regarding this matter.

32.1	Hurunui Nassella Tussock Liaison Committee - Stewart Gibb	We wish to express concern that the status of Nassella Tussock has been changed from "progressive" control in the current strategy to "sustained" control in the proposed plan. Given the massive effort and cost of controlling this difficult pest by landowners, ratepayers, and tax payers for the past 70 or more years, we are concerned that this indicates a slackening of effort and urgency by this council.	No specific decision requested	Note	Currently we are only achieving a stable population of nassella, despite the progressive control objective. We are seeking to include nassella tussock in the sustained control programme, to reflect an achievable objective. The intention is not to reduce current control efforts. In order to have a progressive containment objective for nassella tussock, earlier dates for control, more rigorous inspections would be required and this potentially would not achieve the objective. A key difficulty that we have seen is that identification of nassella is difficult in plants up to three years of age, so new growth is hard to detect.
33.1	Turnbull, Hugh	Nassella should be in progressive containment	Oppose Amend provisions to move Nassella to progressive containment	Note	See submission point 32.1
33.2	Turnbull, Hugh	Add a later compliance date for hill country farms	Oppose Amend Rule 6.4.16 to include a later compliance date of 14 November for hill country farms	Reject	Establishing a compliance date of 14 November would not allow for Biosecurity Officers to undertake inspections prior to nassella seeding. Therefore, the PRPMP objective would not be met.
33.3	Turnbull, Hugh	Add a later compliance date for hill country farms	Oppose Amend Rule 6.4.17 to include a later compliance date of 14 November for hill country farms	Reject	See submission point 33.2

53.8	Rural Advocacy Network - Jamie McFadden	Nassella dates for completion & accompanying map. (rule 6.4.17 & Map 5 Appendix 3). Having a small number of hill country properties as an early finish date is creating confusion amongst landowners. Feedback from landowners is that the nassella map does not accurately reflect the current situation. Our submission is that all hill & high country properties are given the same finish date being 31 October.	Amend rule 6.4.17 so that all hill & high country properties are given the same finish date being 31 October.	Note	<p>There are two dates for compliance proposed in the PRMP to enable Biosecurity Officers to undertake inspections before nassella seeds (typically mid-November). Also, of the 1450 properties identified as having nassella tussock, 1000 of these properties are estimated to have a small number of nassella plants (100 or less) and the compliance date of 30 September is achievable. Community surveys have been run (dates) which indicated strong support for this structure of compliance. However, we agree that Map 5 contains some inconsistencies and does not accurately reflect the intended compliance structure.</p> <p>To address this and reduce confusion, we recommend that a set of criteria is applied to determine the properties subject to 30 September / 31 October finishing dates and that Map 5 be amended in accordance with this criteria. Those properties in the Hurunui District that are 50% or more hill country, and are greater than 250 hectares in size, will be included within the Nassella Tussock Control Zone and will be subject to a 31 October finishing date. Those properties that do not meet those criteria will not be included within the Nassella Tussock Control Zone and will be subject to a 30 September finishing date. The reason for properties that are more than 50% or more hill country, and are greater than 250 hectares in size having a later finish date is that these conditions are likely to require greater time and effort to remove nassella plants.</p> <p>Staff recommend that a notation is also included on Map 5 that states:</p> <p><u>The Nassella Tussock Control Zone delineates properties in Hurunui that are 50% or more hill country, and are greater than 250 hectares in size.</u></p> <p>Refer to Attachment 2 for recommended updated Nassella Tussock Control Zone map</p>
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53.9	Rural Advocacy Network - Jamie McFadden	<p>Change of status for nassella. We oppose the change of nassella from Progressive to Sustained control. While holding the line maybe appropriate for gorse and broom it is not for nassella. Unlike gorse and broom, nassella has fine seed that can be spread by wind some distance onto neighbouring properties. We would like to see the momentum against nassella continued. Some properties have achieved reductions of nassella over time and this should be promoted as the goal for everyone. Holding the line provides no incentive to those landowners that have a consistently poor level of control on their nassella.</p>	<p>Oppose</p> <p>Amend nassella tussock provisions to see the momentum against nassella continued.</p>	Reject	See submission point 32.1
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61.1	Bennett, Chris & Glenda	Our submission is to oppose that the Bennett property at 787 Leader Road East, Cheviot being subject to the early finish date of September 30 and that the October 31st date should apply.	Amend rule 6.4.17 and Map 5 Appendix 3 to set the October 31st date to apply to the property at 787 Leader Road East Cheviot.	Accept	<p>There are two dates for compliance proposed in the PRMP to enable Biosecurity Officers to undertake inspections before nassella seeds (typically mid-November). Also, of the 1450 properties identified as having nassella tussock, 1000 of these properties are estimated to have a small number of nassella plants (100 or less) and the compliance date of 30 September is achievable. Community surveys have been run (dates) which indicated strong support for this structure of compliance. However, we agree that Map 5 contains some inconsistencies and does not accurately reflect the intended compliance structure. To address this and reduce confusion, we recommend that a set of criteria is applied to determine the properties subject to 30 September / 31 October finishing dates and that Map 5 be amended in accordance with this criteria. Those properties in the Hurunui District that are 50% or more hill country, and are greater than 250 hectares in size, will be included within the Nassella Tussock Control Zone and will be subject to a 31 October finishing date. Those properties that do not meet those criteria will not be included within the Nassella Tussock Control Zone and will be subject to a 30 September finishing date. The reason for properties that are more than 50% or more hill country, and are greater than 250 hectares in size having a later finish date is that these conditions are likely to require greater time and effort to remove nassella plants.</p> <p>Staff recommend that a notation is also included on Map 5 that states:</p> <p><u>The Nassella Tussock Control Zone delineates properties in Hurunui that are 50% or more hill country, and are greater than 250 hectares in size.</u></p> <p>Refer to Attachment 2 for recommended updated Nassella Tussock Control Zone map</p>
63.1	Stackhouse Farm Ltd - Adrienne	People like myself know just how	Amend the PRPMP to provide for	Reject	Staff currently apply criteria for grubbing based on

Stackhouse

quickly this plant can spread and cover large areas of pasture leaving it not suitable for grazing. We have a common boundary with 9 vineyards and 7 lifestyle blocks and have seen tussocks spread rapidly. One lifestyle block that had a yearly grubbing of 20-50 tussocks per year, had a new lease who missed grubbing for two seasons because of not knowing about tussock, found that the block was growing over 700 tussocks per year, to grub for the following two years. This block is still producing large numbers of tussocks each year.

On our two adjoining blocks of land – approximately 140 hectare each, each block has had a 2-hour inspection on 12 of the last 13 years. We have failed to pass inspection because we have missed a few plants and have been issued with legal non-compliance notices. Initially when we took ownership, we were grubbing approximately 10,000 plants per season – now down to approximately 2000-2500 plants. On six of the 12 years, our regrubbing required less than 20 plants to be compliant and a further 4 years less than 50 plants to comply. Surely, the inspector could grub the few plants we have missed but no, they photograph them, G.P.S. their location and send us a map telling us how incompetent we are. Yes, we have missed 1 tussock to every 6-10 hectares we own. Meanwhile our lifestyle and vineyard neighbours tell me ECan staff grub their block often grubbing 2 or more tussock per hectare. If ECan are going to control tussocks they should be inspecting every property over 500

consistency of approach to nassella, ECan should either grub the scattered tussocks that landowners have missed or treat us all the same and stop grubbing lifestyle blocks and vineyards. I would suggest that 1 tussock per hectare could be a guide for inspectors to grub. Over that density, the inspector could then issue non-compliance notices.

the number of plants found during the inspection (i.e. takes almost no extra time to grub a very low number while undertaking the inspection), or that it would be more cost effective for the council to undertake grubbing than proceed with a formal enforcement process. It is not appropriate to include this level of operational detail in the RPMP, however, this criteria could be detailed in a guidance document to be timed with the commencement of the RPMP.

		square metres a minimum of once every 3 years.			
74.8	Federated Farmers - Lynda Murchison	Federated Farmers recommends a standardisation of the control inspection deadline for nasella tussock to 31 October for all properties, as opposed to 30 September for those outside the Nasella Control Zone in the proposed RPMP. A standardised date of 31 October avoids stock disturbance from nasella control and monitoring activity during lambing and allows landowners to identify nasella more readily as it develops during the spring. This would still allow a staggered inspection period by Environment Canterbury as landowners who wish to be inspected at an earlier date could do so by arrangement. Federated Farmers notes that the zones outlined in the map accompanying the RPMP are confusing, making it difficult for landowners to ascertain which category they are in from the material provided. The criteria for being in or out of the zone is also unclear.	Amend the nasella tussock provisions to standardise the control inspection deadline to 31 October for all properties.	Reject	A requirement for all 1450 affected properties to complete work by 31 October would not allow sufficient time for council inspections to prevent significantly more seeding. This would result in increased numbers and prevent the attainment of the RPMP objective. Nassella seed is generally viable from the third week of November. The current dates have been in place since 2005 with no feedback on issues from the community in this time that haven't been able to be accommodated. Scientific studies and population modelling by AgResearch in conjunction with the Hurunui Nassella Pest Management Liaison Committee have resulted in advice to the community that continuing with the current programme is most likely to prevent an increase in overall population densities.
77.20	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 15 and related good neighbour rule 6.4.16 seeking the sustained control of Nassella Tussock to ensure population levels do not increase. Sustained control will ensure effects of Nassella Tussock on production values are minimised.	Support  Retain objective 15, and good neighbour rule 6.4.16.	Accept	
78.23	Department of Conservation - David Newey	The Director General has undertaken or enabled Nassella tussock control on Public Conservation land to date	Support  Retain objective 15	Accept	

		and intends to continue with this level of control.			
78.24	Department of Conservation - David Newey	The Director General does not agree that this rule meets the criteria of the of a good neighbour rule.	Oppose  Amend rule 6.4.16 to what would be an acceptable good neighbour rule with a suggested 50m rule distance.	Accept in part	We accept the need to include a boundary distance for nassella tussock, but there is evidence that nassella seed can be dispersed over a significant distance depending on the conditions. We recommend that a distance of 100 metres would be appropriate to catch most of the wind-spread seed, and still be reasonable for the Crown to control.  We recommend amending rule 6.4.16 as follows:  All occupiers shall, on receipt of a written direction from an Authorised Person, remove nassella tussock plants on land they occupy:  (a) within the Nassella Tussock Control Zone delineated on Map 5 in Appendix 3 by 31 October every year; or  (b) In all other parts of the Canterbury Region by 30 September each year;  <u>within 100 metres of the adjoining property boundary</u> where the occupier of the adjoining property is taking reasonable steps to remove nassella tussock plants.
82.2	Ministry for Primary Industries - Sherman Smith	Regarding the Good Neighbour Rules (GNR), the rule for nassella tussock may be inconsistent with the NPD. Under the Biosecurity Act 1993, GNR can only be used to mitigate the risk of spread to adjacent or nearby landowners, where this will cause costs to those landowners. Therefore a GNR can only apply to the part of a pest infestation that is capable of spreading to the adjacent or nearby land, and these are generally restricted to managing pests within a	Amend rule for nassella tussock to be consistent with the NPD	Accept	See submission point 78.24.

		certain distance of the boundary with that land. A GNR would not be considered reasonable if it applied to pests that are unlikely to spread to the adjacent or nearby land.			
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Staff Recommendation</b>	<b>Reasons</b>
5.2	Davies, Mike	You say there are good neighbour rules and yet I have observed old mans beard increasing every year in the selywn river bed for more than 20 years.	No decision requested.	Note	Background comment with no specific decision requested.
6.5	Ross, Fraser Bell	Darwin's barberry is a troublesome weed in Claremont Bush Scenic Reserve and needs to be controlled there.	Insert provisions to control Darwin's barberry at Claremont Bush Scenic Reserve.	Note	Staff note that Claremont Bush Scenic Reserve is a Timaru District Council Reserve, and responsibility for pest management sits with the district council.
6.6	Ross, Fraser Bell	Old Man's Beard: also subject to the Biosecurity Act sections 52 and 53. with Environment Canterbury having a role for advocacy, education and control. A special control or eradication focus should be on the beds of rivers where is it frequently present and can provide a seed source to infiltrate nearby stands of bush and native forests.	Amend provisions to focus on control and elimination of old man's beard, especially on the beds of local rivers within the site-led programme.	Reject	A number of site-led programmes have been proposed for old man's beard, refer to section 6.5 of the PRPMP.
6.11	Ross, Fraser Bell	Possum: this animal pest is present throughout the Canterbury Region and causes significant damage to indigenous vegetation, such as rata, and also prey on the eggs and young of native birds, in their nests. Sustained possum control is needed throughout the region, not only for animal health reasons but also to	Insert provision for sustained possum control throughout the region, either by encouraging operators or/and included within the site-led programme.	Note	Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements are provided.

		protect and enhance biodiversity, especially native wildlife.			
6.12	Ross, Fraser Bell	there are many more pest organisms that need to be effectively controlled or eliminated and include, gorse, broom, rabbits, ivy, old man's beard, bell heather and Spanish heath. Where included in the Proposal the programmes, this is generally supported.	Support in part  Insert provision to effectively control or eliminate gorse, broom, rabbits, ivy, old man's beard, bell heather and Spanish heath	Reject	The PRPMP proposes to manage gorse, broom, rabbits, old man's beard and bell heather. Staff consider Ivy and Spanish heath to be too widespread throughout Canterbury to enable effective management. Spanish heath is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities.
6.23	Ross, Fraser Bell	Bell Heather - has been funded for sometime and this should continue and is supported.	Support  Support for existing approach to funding for bell heather control, no amendment sought.	Accept	
12.3	McNeill, Steve	b) Priorities. (i) There does not appear to be a concerted effort to control Boneseed and Broom species across Banks Peninsula. Relaxation of effort will result in the need for expensive and ratepayer-funded solutions in the future.	Oppose  Amend the RPMP to provide for greater control of Boneseed and Broom across Banks Peninsula.	Reject	An inspection programme is in place to ensure the clear land remains clear of broom. Areas of boneseed outside the Port Hills / Lyttelton Containment zone are proposed to be reduced by 10 percent, and within the zone a programme is proposed to ensure that population levels do not increase.
18.9	Frank, Hermann	Sections 5.1 – 5.5 are all supported, especially the GNR for Crown properties in 5.4. Under 'The pests subject to GNR's include Bennett's wallaby, feral rabbit, broom, gorse, old man's beard, and nassella tussock', sycamores need to be included as well (see above).	Support in part  No specific decision requested [see submission point 18.1 regarding sycamores]	Accept in part	See submission point 18.1 regarding sycamore.
18.10	Frank, Hermann	Section 6.1 – 6.3 are all supported and the detailed description of the pests etc. is positive, but as	Support in part  See submission point 18.4	Note	See submission point 18.4

		mentioned above, they might be better placed in an appendix.			
18.12	Frank, Hermann	Under Plan Objective 5 for bell heather the wording 'not increase' should be replaced by 'decrease'.	Amend objective 5 to replace 'not increase' with 'decrease'	Reject	The suggested amendment would change the objective from a sustained control approach to a progressive containment objective. To actively decrease extent would require a significant increase in resources from the proposed programme.
18.22	Frank, Hermann	Table 26 and Plan Objective 16 for Old Man's Beard are supported, but in Plan Rule 6.4.18 the size needs to be changed from 100sqm to 500sqm and also Plan Rule 6.4.19 is covered by Plan Rule 6.4.20. The width to the boundary in Plan Rule 6.4.20 needs to be changed from 20m to 50m. If Plan Rule 6.4.19 should remain (for what reason?), the distance should be changed accordingly.	Amend rule 6.4.18 to change the size from 100sqm to 500sqm	Reject	Staff considers that this increase in size would pose unreasonable costs to occupiers to manage old man's beard.
18.23	Frank, Hermann	See submission point 18.22	Delete rule 6.4.19 as it is covered by rule 6.4.20	Reject	Rule 6.4.19 is specifically a good neighbour rule, which can only be enforced under a number of conditions, one of which is that adjoining neighbours have cleared or are clearing old man's beard infestations within 20 metres of the boundary. Rule 6.4.20 requires that old man's beard is destroyed within 20 metres of the boundary regardless of the neighbour's control. However, rule 6.4.19 does not apply to the Crown, whereas 6.4.20 does.
18.24	Frank, Hermann	See submission point 18.22	Amend rule/s 6.4.19 and 6.4.20 [depending on decision in submission point 18.23] to change the boundary width from 20m to 50m	Reject	Staff consider that this increase in width would pose unreasonable costs to occupiers to manage old man's beard, and could not be justified.
20.1	Marlborough District Council -	MDC supports the proposed	Support in part	Accept	

	Jono Underwood	programme for Kangaroo Grass. This organism is under management in the Marlborough Region.	Retain the proposed Programmes for Kangaroo Grass.		
20.2	Marlborough District Council - Jono Underwood	MDC supports the proposed programme for Woolley nightshade. This organism is being considered for management in the Marlborough Region.	Support in part Retain the proposed Programmes for Woolley Nightshade.	Accept	
20.3	Marlborough District Council - Jono Underwood	MDC supports the proposed programmes for Moth Plant. Moth plant in the Marlborough has been managed for a number of years and is under sustained control.	Support in part Retain the proposed Programme for Moth Plant.	Accept	
20.4	Marlborough District Council - Jono Underwood	MDC supports the proposed programmes for Rooks. Rooks have been managed in Marlborough and are now believed to be eradicated (no active rookeries).	Support in part Retain the proposed Programme for Rooks.	Accept	
20.6	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.  a)The management of the pest plant.  While Service Delivery is mentioned as a Principle Measure, the programme reads that occupiers are responsible for carrying out control work. MDC has a long history of managing CNG. For the last 20+ years, the bulk of control work has been driven via occupier obligations. From experience, for a number of	Support in part  Ensure the structure of the programme and determine whether the likelihood Principles Measures and Rules will achieve the stated Objective. This should require an assessment of programme costs and cost allocation and MDC wishes to endorse the application of suitable resources into the CNG programme to effectively meet programme objectives.	Accept in part	There is a rigorous inspection process in place for Chilean needle grass and we are confident that this rule coupled with the implementation and service provided by Biosecurity Officers will achieve the objectives for Chilean needle grass. However, staff recommend inserting a rule requiring the internal management of Chilean needle grass if a management plan has not been established. This is to ensure the achievement of the objective, should the council be unable to assist with control. The council does not expect there to be a change in the current arrangements with occupiers.  Staff accept the comments and to ensure control over the life of the RPMP, staff recommend the following rule (note this includes the recommendation from submission point 44.8) :

reasons that can be elaborated upon, this has not resulted in effective management.

**Plan Rule 6.4.9** (the existing rule 6.4.9 becomes 6.4.10)

All occupiers with the Canterbury region with Chilean Needle Grass on their property shall either:

(a) prevent Chilean Needle Grass from releasing panicle seed on land they occupy; or

(b) be party to a Written Management Agreement that has not been terminated. For the purpose of this rule, prevent means the preclusion of the plant's ability to release panicle seed.

A breach of this rule creates an offence under section 154N(19) of the Act.

#### Definitions

For the purpose of this rule, Written Management Agreement means an agreement signed between the land occupier and the Council. It must address the following matters:

a) Map the physical attributes of the property, including the known areas of Chilean Needle Grass and control mechanisms that are in place.

b) Either:

i. identify the areas for the occupier to undertake control works on their land and specify the control works to be undertaken (including physical and/or chemical control methods); or

ii. where areas for control have not been identified, identify an area/s within which the Council will undertake a search and undertake any necessary control works; or

iii. where control works are not required, the containment methods that will be used to ensure any spread of Chilean Needle Grass to other properties is prevented, including:

					<ul style="list-style-type: none"> <li>• <u>the sale of sheep grazed in known Chilean Needle Grass areas;</u></li> <li>• <u>the inspection of cattle, horses and deer from known Chilean Needle Grass areas prior to movement or sale;</u></li> <li>• <u>the inspection of dogs prior to movement outside of the property boundary;</u></li> <li>• <u>vehicle hygiene protocols for vehicles/machinery/equipment (including clothing and personal equipment);</u></li> <li>• <u>the sale and distribution of any crops;</u></li> <li>• <u>visitor entry and exit points, signage, access;</u></li> <li>• <u>notification to Environment Canterbury of stock movement and location beyond the property;</u></li> <li>• <u>to address specifically, the use of CNG infested land for recreational use.</u></li> </ul> <p><u>c) The review of the Written Management Agreement on an annual basis, or earlier, if there is a change in land use that would result in the Written Management Agreement being unfit for purpose.</u></p>
20.7	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>b) Rule 6.4.8 seems to place a very 'light' obligation on occupiers and the CNG Management Agreement definition contains no mention of organism management activities.</p> <p>MDC wishes to express concern over a seemingly light approach to management on the pest plant and more reliance on occupier management. This is where historical programmes have come from in the</p>	<p>Support in part</p> <p>Amend provisions to either a higher degree of obligation on occupiers or move toward more involvement of Environment Canterbury in the management of the pest, and articulate that.</p>	Accept in part	See submission point 20.6

		Marlborough Region with not ideal outcomes. MDC is now becoming more actively involved in the management of the pest in recognition of more agency involvement being needed to effectively achieve outcomes.			
20.8	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>c) MDC assumes that legal advice has been sought over the placement on an obligation to be party to an agreement within Rule 6.4.8, as it is not clear whether this Rule requirement meets any of the rule purposes permitted under Section 73(5) of the Act.</p>	<p>Support in part</p> <p>Clarify the legality (robustness) of Rule 6.4.8 with respect to placing an obligation on occupiers to be party to an agreement.</p>		<p>The use of a management agreement has been reviewed by legal counsel and it has been recommended to amend this to a management 'plan'. Recommended changes are below (note this includes the recommendation from submission point 44.8)</p> <p><b>Plan Rule 6.4.8</b></p> <p>All occupiers within the Canterbury region, with Chilean needle grass (<u>CNG</u>) present on their property shall:</p> <p>(a) eliminate all <del>Chilean need grass</del> <u>CNG</u> plants within 5 metres of an adjoining property boundary; and</p> <p>(b) <del>hold and operate in accordance with</del> <u>be a party to a Chilean Needle Grass (CNG) Management Agreement Plan</u> For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p> <p>Definitions</p> <p>1. <del>Chilean Needle Grass Written Management Agreement</del> <u>CNG Management Plan</u> means an <u>agreement signed between the land occupier and Environment Canterbury. It must be a written management plan that is certified by the Chief Executive or authorised person of Environment Canterbury as addresses</u> addressing the following containment matters (where relevant):</p>

					<ul style="list-style-type: none"> <li>• the sale of sheep grazed in known CNG areas;</li> <li>• the inspection of cattle, horses and deer from known CNG areas prior to movement or sale;</li> <li>• the inspection of dogs prior to movement outside of the property boundary;</li> <li>• vehicle hygiene protocols for vehicles/machinery/equipment (including clothing and personal equipment);</li> <li>• the sale and distribution of any crops;</li> <li>• visitor entry and exits points, signage, access;</li> <li>• notification to Environment Canterbury of stock movement and location beyond the property</li> <li>• <u>to address specifically, the use of CNG infested land for recreational use.</u></li> </ul>
20.9	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>d) While MDC support the approach taken to address spread risk vectors and pathways, there is a limitation of Rule 6.4.8 in that an obligation is only placed upon occupiers with CNG present on their property. MDC expresses concern over the narrow scope of influence of such a Rule in that it does not place obligation or persons at large to carry an obligation to conduct activities in a certain manner.</p>	<p>Support in part</p> <p>Amend provisions to broaden the approach taken to spread risk mitigation to greater than just occupiers with CNG on their properties. Explore the use of specific Rules regulating high risk activities at large.</p>	Reject	<p>The staff would benefit from further evidence to understand the type of 'high risk activities at large' that the submitter is referring to. However, staff note that while rules 6.4.8 and 6.4.9 relate to occupiers, sections 52 and 53 of the Act prevent the communication, release, spread, sale and propagation of pests - which relates to everyone.</p>
20.10	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC</p>	<p>Support in part</p> <p>Clarify what programme</p>		<p>The collaborative approach to control with occupiers (managed outside of the RPMP provisions) is the way this part of the objective will be achieved.</p>

		<p>would like to raise points of concern with respect to the proposed programme.</p> <p>As a general comment, MDC notes the use of the terms 'spread' within the programme description. This inherently relates to where the plant is found, spatially. However, spread of the plant makes up but one half of the programme objective in that part (i) targets no increase in population levels. No other parts of the programme description highlight how the programme will prevent an increase in population levels.</p>	<p>components will see no increase in population levels as being sought within the programme objective.</p>		<p>However, staff recommend to support this approach with a new rule. For details, refer to submission point 20.6</p>
20.11	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Feral Rabbits. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.</p>	<p>Support</p> <p>Retain the proposed Programme for Feral Rabbits.</p>	Accept	
20.13	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Saffron Thistle. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.</p>	<p>Support</p> <p>Retain the proposed Programme for Saffron Thistle.</p>	Accept	
21.1	Eggers, James	<p>1. Genetically breed rabbits to be infertile.</p>	<p>Insert provisions to genetically breed rabbits to be infertile.</p>	Reject	<p>It is outside the scope of the PRPMP to provide for the genetic modification of rabbits. The council does the follow development of biological controls for pests, and in some cases may provide funding or support for applications for funding. This is part of the council's wider biosecurity programme.</p>

21.2	Eggers, James	2.Organise hunting days, or weekends, where people are educated, trained and transported to sites to shoot rabbits.	Insert provisions in the RPMP to organise hunting days, or weekends, where people are educated, trained and transported to sites to shoot rabbits.	Reject	It is outside the scope of the PRPMP to facilitate hunting events, while community pest control days may be facilitated for pests such as old man's beard, the council does not have the capability to facilitate hunting events.
23.1	Mueller, Tim	In general, I support the Regional pest Management Plan being proposed by the Regional Council and in particular the site-led programme for Gorse and Broom, Ohau. However, as a new property owner in the Lake Ohau Alpine Village, the proposal is not particularly clear as to what is expected or required from me as a property owner. For instance, at what stage am I , the owner of a small undeveloped 700 sq metre section, expected to intervene? And more importantly, how often should I intervene. Is there some financial assistance or recommended service providers that the Council can provide, especially to those of us who are absentee?	Clarify what is expected or required from me as a property owner. For instance, at what stage am I , the owner of a small undeveloped 700 sq metre section, expected to intervene? And more importantly, how often should I intervene. Is there some financial assistance or recommended service providers that the Council can provide	Note	Council staff will contact the submitter to gather more information and discuss individual situation
24.1	Ravensdown Limited - Anna Wilkes	<p>Ravensdown supports the inclusion of Whiterock Quarry in the Site-led Programme for eradication of Wild Thyme.</p> <p>We consider that the management of Wild Thyme on the quarry site and 3.5ha of land leased from the Milne family trust (Lot 4 DP755) to the north of the quarry fits with our existing maintenance regime for managing weeds and do not see it as an onerous addition. We will continue to work with Environment Canterbury to fulfil our obligations under the</p>	<p>Support</p> <p>Retain inclusion of Wild Thyme management at Whiterock Quarry as a Site-led Programme as proposed.</p>	Accept	

		Regional Pest Management Strategy.			
25.4	Rayonier Matariki Forests - Steve Chandler	Page 37 Table 14: Support: Agree with broom, gorse and nasella tussock being included as pests for sustained control.	Supports broom, gorse, nassella tussock being included as pests for sustained control.	Accept	
25.7	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.10, Page 52: Support.	Supports Rule 6.4.10	Accept	
25.8	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.13 page 53: Support	Supports Rule 6.4.10	Accept	
27.1	Taylor, R E	<p>ECan does not invest sufficiently in invasive weed control on the river corridors of South Canterbury, which are reservoirs of weed species spreading beyond the rivers, such as such as sycamore, old man's beard and buddleia. I have photos to illustrate this, taken on the Lower Opihi, Waihi and the TeMoana. Some rivers (e.g. TeMoana) do not appear to have local rating districts, which must contribute to the lack of public resources?</p> <p>The Canterbury braided rivers are also becoming clogged by shrubby willow growth (which may be from seed?), lupins, broom and gorse - after several dry summers have meant no or little flood scouring. Once the islands in these rivers are stabilised by weed growth and associated silt trapping, they become harder to erode and the braided character of the rivers tends to be lost. With this comes loss of bare shingle nesting habitat for endangered birds such as black billed gulls and black fronted terns, also</p>	<p>Oppose</p> <p>No specific decision requested</p>	Note	

		wrybills, stilts and banded dotterells. There must be opportunity to connect river engineering works with ECan's biodiversity commitments and intervene more effectively?			
44.1	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>"Plan Objective 10 Over the duration of the Plan, sustainably control Chilean needle grass within the Canterbury region to ensure: (i) that current infestations levels do not increase; and (ii) any spread to other properties is prevented to minimise its adverse impacts on pastoral production values.</p> <p>The CNGNSG endorses the above Objective.</p>	<p>Support</p> <p>No specific decision requested</p>	Accept	
44.2	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>The CNGNSG takes issue with the lack of transparency and rigor in the above assessment [Chilean needle grass Principal measures to be used and Alternatives considered]</p>	No specific decision requested	Note	<p>The Alternatives considered section is a requirement under the Biosecurity Act to ensure that an organism's inclusion in a Pest Management Plan is required and cannot be better managed by other mechanisms. Staff did not intend to undermine the value and effectiveness of alternative approaches, just to show that regulation is a critical element to ensure that Chilean needle grass levels of infestation do not increase, and spread to other properties is prevented. Staff recommend that the Alternatives considered sections from the PRPMP are removed from the final RPMP as they relate specifically to providing sufficient information in the Proposal.</p>
44.3	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>CNGNSG Agree with the comment: "Relying on voluntary control is not appropriate due to the rapid spread and very substantial adverse effects if control is not undertaken by a land occupier"</p>	<p>Support</p> <p>No specific decision requested</p>	Note	See submission point 44.2

44.4	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>“Environment Canterbury could take on the responsibility for controlling the spread of Chilean needle grass. However, the extent of Chilean needle grass is such that the logistics of carrying out the control programme would be difficult to integrate with individual property occupier management requirements”</p> <p>This statement has merit, however just because it is hard to do does not mean it should not be done.</p>	No specific decision requested	Note	Background decision with no specific decision requested
44.5	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>“It is also unlikely to be cost effective”</p> <p>CNGNSG takes issue with the lack of transparency and rigor in the above assessment; Protecting New Zealand's Hill and High Country future land use and the understanding of the protection of New Zealand's fresh water, biodiversity and recreational values let alone the direct cost of pasture renovation and animal welfare issues are all part of the analysis required. This work has yet to be completed and when done will add enormous value to future cost benefit analysis.</p>	No specific decision requested	Note	See submission point 44.2
44.6	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>“Furthermore, the consequences of occupiers no longer owning the problem could lead to overoptimistic expectations on the part of both occupiers and the wider community and adverse effects to economic well-being would not be minimised. This alternative is therefore rejected. There are no alternative measures that provide for satisfactory inspection,</p>	No specific decision requested	Note	Background comment with no specific decision requested

		<p>education or advocacy measures.”</p> <p>CNGNSR wish to point out that one does not need to look far from ECAN’s own regional boundary, to see one of many alternatives being implemented; this statement should be removed to enable opening of lines of communication and sharing of ideas and values.</p>			
44.7	<p>Chilean Needle Grass National Steering Group - Warwick Lissaman</p>	<p>CNGNSG opposes the Plan Rule 6.4.8 (a)</p> <p>Please refer to the attached proposed draft rules of Marlborough District Council PMP, where the elimination zone was previously 10m and this has proved to be ineffectual and of no positive environmental outcome, a default rule that: ‘Occupiers shall destroy all Chilean Needle Grass (Nassella neesiana) plants, on land that they occupy, each year before they produce seed, unless a Management Plan* approved by Council is in place. A breach of this rule will create an offence under section 154N(19) of the Biosecurity Act.’</p>	<p>Oppose</p> <p>Delete rule 6.4.8 (a) and replace with ‘Occupiers shall destroy all Chilean Needle Grass (Nassella neesiana) plants, on land that they occupy, each year before they produce seed, unless a Management Plan* approved by Council is in place. A breach of this rule will create an offence under section 154N(19) of the Biosecurity Act.’</p>	Accept in part	<p>There is a rigorous inspection process in place for Chilean needle grass and we are confident that this rule coupled with the implementation and service provided by Biosecurity Officers will achieve the objectives for Chilean needle grass. However, staff recommend inserting a rule requiring the internal management of Chilean needle grass if a management plan has not been established. This is to ensure the achievement of the objective, should the council be unable to assist with control. The council does not expect there to be a change in the current arrangements with occupiers.</p> <p>Staff accept the comments and to ensure control over the life of the RPMP, staff recommend the following rule (note this includes the recommendation from submission point 44.8):</p> <p><b>Plan Rule 6.4.9</b> (the existing rule 6.4.9 becomes 6.4.10) <u>All occupiers with the Canterbury region with Chilean Needle Grass on their property shall either:</u></p> <p><u>(a) prevent Chilean Needle Grass from releasing panicle seed on land they occupy; or</u></p> <p><u>(b) be party to a Written Management Agreement that has not been terminated. For the purpose of this rule, prevent means the preclusion of the plant’s ability to release panicle seed. A breach of this rule creates an offence under section 154N(19) of the Act.</u></p>

## Definitions

For the purpose of this rule, Written Management Agreement means an agreement signed between the land occupier and the Council. It must address the following matters:

a) Map the physical attributes of the property, including the known areas of Chilean Needle Grass and control mechanisms that are in place.

b) Either: i. identify the areas for the occupier to undertake control works on their land and specify the control works to be undertaken (including physical and/or chemical control methods); or ii. where areas for control have not been identified, identify an area/s within which the Council will undertake a search and undertake any necessary control works; or iii. where control works are not required, the containment methods that will be used to ensure any spread of Chilean Needle Grass to other properties is prevented, including:

- the sale of sheep grazed in known Chilean Needle Grass areas;
- the inspection of cattle, horses and deer from known Chilean Needle Grass areas prior to movement or sale;
- the inspection of dogs prior to movement outside of the property boundary;
- vehicle hygiene protocols for vehicles/machinery/equipment (including clothing and personal equipment);
- the sale and distribution of any crops;
- visitor entry and exit points, signage, access;
- notification to Environment Canterbury of stock movement and location beyond the property;
- to address specifically, the use of CNG infested land for recreational use.

c) The review of the Written Management Agreement on an annual basis, or earlier, if there is a change in land use that would result in the Written

					<u>Management Agreement being unfit for purpose.</u>
44.8	Chilean Needle Grass National Steering Group - Warwick Lissaman	CNGNSG endorses the Plan Rule 6.4.8(b), and recommend the inclusion of one more bullet point  • to address specifically, the use of CNG infested land for recreational use.	Support in part  Amend rule 6.4.8(b) to include an additional bullet point: to address specifically, the use of CNG infested land for recreational use.	Accept	This is valuable addition to the Chilean Needle Grass Written Management Agreement, and would require consideration and management on land used for recreational activities such as rogaie, mountain biking events, for example. We recommend the inclusion of the following text in the Definitions under rule 6.4.8(b): <u>to address specifically, the use of CNG infested land for recreational use.</u>
53.1	Rural Advocacy Network - Jamie McFadden	We support the general direction of the strategy in addressing pest issues. All landowners need to be responsible managers of their land. The momentum on legacy pests particularly broom, gorse, nassella and rabbits needs to be maintained.	Support  General support for the PRMP	Accept	
53.4	Rural Advocacy Network - Jamie McFadden	There is a conflict between the CRPMP and the Land & Water Regional Plan (LWRP). On the one hand the CRPMP seeks to limit the spread of pests. On the other the LWRP stock exclusion rules exacerbate the spread of pests through the requirement for fencing of waterways and wetlands. We believe this inequity needs to be addressed in that ECans fencing requirements are aiding the spread of pests thus burdening landowners with additional costs and compliance issues. This is particularly an issue with the broom and gorse less than 50m2 rules. Related to this is that fenced waterways near main rivers such as Hurunui, Waiau, Pahau and Waitohi are being invaded by old mans beard. Mandatory stock exclusion	Insert provisions in the RPMP for mandatory stock exclusion requirements to not apply in hill, high country or extensive grazing situations. We submit that where waterway fencing is required and weed invasion likely a pragmatic approach is required.	Reject	This is outside the scope of the RPMP, this is a matter to be considered during a review of the LWRP. Central government stock exclusion provisions are currently being considered <a href="http://www.mfe.govt.nz/node/22969">http://www.mfe.govt.nz/node/22969</a>

		requirements should not apply in hill, high country or extensive grazing situations. We submit that where waterway fencing is required and weed invasion likely a pragmatic approach is required.			
58.3	KiwiRail Holdings Limited (KiwiRail) - Pam Butler	<p>KiwiRail supports the use of Good Neighbour rules (GNRs) for all PPMP stakeholders and occupiers. PPMP provides for GNR's for plant pests broom, gorse, old man's beard, and nassella tussock. KiwiRail considers the both Good Neighbour Rules and agreed Management Plans are methods by which parties can agree to priorities for pest management based on significant pests threats. Other possibilities include:</p> <ul style="list-style-type: none"> <li>• contributions to biological control agent trials and release</li> <li>• targeted timing of pest management with agency or other projects</li> </ul>	Retain Good Neighbour Rules	Accept	
77.17	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part objective 13 and related good neighbour rule 6.4.5 seeking the sustained control of Feral Rabbits to ensure population levels do not exceed Level, 3 on the Modified McLean Scale. Sustained control will ensure effects of Feral Rabbits on biodiversity and production values are minimised.</p> <p>LINZ however considers that an exemption should be included in rule 6.4.11 from having to control rabbits where an effective boundary fence is in place along the entire length of the common boundary which prevents rabbits crossing into the neighbouring</p>	<p>Support</p> <p>Retain objective 13</p>	Accept	

		property.			
77.18	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.17	<p>Support in part</p> <p>Amend good neighbour rule 6.4.11 as follows:</p> <p>Note: This is designated a Good Neighbour Rule</p> <p>An occupier within the Canterbury region shall, upon receipt of a written direction from an Authorised Person, control feral rabbit densities on their land to at or below Level 3 on the Modified McLean Scale within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also controlling feral rabbit densities at or below Level 3 on the Modified McLean Scale within 500 metres of the boundary.</p> <p>The provisions of this rule do not apply where there is a rabbit proof boundary fence along the entire length of common boundary of the property which is effective in preventing rabbits crossing into the neighbouring property.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	Reject	See submission point 77.14
77.21	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 16 and related good neighbour rule 6.4.19 seeking the sustained control of Old Man's Beard to ensure plant numbers or density levels do not increase. Sustained control will ensure effects of	<p>Support</p> <p>Retain objective 16, and good neighbour rule 6.4.19.</p>	Accept	

		Old Man's Beard on biodiversity values are minimised.			
78.13	Department of Conservation - David Newey	The Director General considers that sustained control of pests is vital. There are however additional pests which, due to their nature, spread and effect should be included in this section of the plan.	Support in part  Retain with amendments outlined in this submission.	Note	
78.18	Department of Conservation - David Newey	Where there is effective fencing and there is no cross-boundary issue, a good neighbour would not apply in this instance.	Support in part  Amend rule 6.4.11 to recognise that if an effective fence prevents feral rabbits from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.	Note	Staff do not see the need to include this detail as part of the Good Neighbour Rule for feral rabbit. If a measure is in place which prevents rabbit spread across a boundary, this rule cannot be invoked (only to be applied when the spread affects neighbouring land). Secondly the wording suggested "effective" may be difficult for Biosecurity Officers to apply consistently.
78.25	Department of Conservation - David Newey	The current description underrates the significance of this invasive species.	Support in part  Amend the description "Purple Loosestrife is rated in the top 100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)", and "It impacts on environmental and agricultural values, as well as impacting on kai and taonga species important to Ngai Tahu.	Accept	This addition is supported, we propose including this text below the last paragraph of the description.
78.34	Department of Conservation - David Newey	The current description underrates the significance of this invasive species.	Support in part  Insert into the description "Spartina is rated in the top 100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)", and "It impacts on environmental values, recreational usage, impacts on kai and taonga species important to	Accept	This addition is supported, we recommend including this text below the last paragraph of the description.

			Ngai Tahu, and, commercial fisheries. Estuaries are recognised as important habitats for some juvenile fish species harvested by commercial fisheries.		
78.35	Department of Conservation - David Newey	With the recent additional funding of \$50,000 provided to ECAN for Spartina control it is possible to reduce the area of Spartina by considerably more than 50%	Support in part  Amend objective 20, the area that Spartina will be reduced by from 50% to a higher percentage	Accept	Due to the additional confirmed funding for this pest through the Department of Conservation's "Dirty Dozen" War on Weeds, we propose amending the objective to read: (i) the area of spartina being reduced by <u>75%</u>  This is not set to 100% as there may be new sites identified as part of the control programme.
78.36	Department of Conservation - David Newey	The Director General appreciates the work that has gone into the analysis of benefits and costs. There are some inaccuracies and omissions in the analysis for some species. Our concerns mainly lie with wilding conifers, Bennetts wallaby, purple loosestrife, Spartina, gorse, and broom.  An analysis of costs and benefits for Russell lupin is desirable. There are significant and increasing costs to control this species at important sites. There may be a marginal benefit as a fodder crop. Fodder crop growers have alternative and less invasive fodder crop options. The seed is long-lived and spreads via water, shingle extraction and machinery. It has potential to become an intractable weed issue once established. We do not agree with the assessment and comments on this weed as described on page 189 of the analysis of costs and benefits table.	Support in part  Request that a review of the analysis of costs and benefits if the species are either removed from the strategy or substantial changes are proposed in the final plan.  Conduct an accurate analysis of costs and benefits for Russell lupin.	Note	Staff note that further cost benefit analysis may be required depending on changes through the Hearing process. Currently, staff are not recommending significant changes to wilding conifers, Bennetts wallaby, purple loosestrife, Spartina, gorse, and broom.  Regarding Russell lupin, a cost benefit analysis may be required. However, at this stage, staff do not have the requisite information to undertake such analysis.

79.3	Christchurch City Council - Brenda Greene	The requirement to act occurs only when rules dictate.	Insert rules for puna grass, bur daisy, saffron thistle and all unwanted organisms in the sustained control programme, 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.	Reject	These pests purposefully do not contain a rule requiring occupiers to undertake control. The council will provide the service delivery to manage the pest (as described in the "Principal measures to be used" section). The reason why these organisms are included in the plan is to declare these as pests and ensure that Officers are able to call upon powers under the Biosecurity Act (Part 6) to ensure that effective management can occur. Occupiers need to be aware of the requirements under Sections 52 and 53 of the Biosecurity Act which place restrictions on organisms classified as pests, including preventing the communication, release, spread, sale and propagation of pests. (See section 5.4 of the RPMP, page 20)
79.25	Christchurch City Council - Brenda Greene	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 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.	Amend the RPMP to insert provisions for a trial for a period of 5 years a programme similar to that adopted by the Auckland Council on Banks Peninsula.	Reject	The RPMP proposes a number of site-led programmes for old man's beard, in order to support the community to achieve their aspirations. Advocacy and incentives could be provided using non-regulatory methods, alongside the RPMP.

81.4	QEII National Trust - Alice Shanks	Given the small size of the two thyme (Thymus vulgaris) infestations it is clear that the control applied for the past 15 years is not working. It is more economic and efficient to eliminate thyme. It is a threat to the Eastern South Island limestone ecosystem, a Naturally Uncommon ecosystem, with a disproportionate number of National and Regiona threatened plants.	Support in part  Amend the RPMP to reclassify Thymus vulgaris to a Eradication species and removed within 10 years, using intensive, methods that have no impact on the indigenous biodiversity and threatened plants at the sites.	Reject	Wild Thyme occurs in gardens throughout Canterbury, an eradication programme would be unachievable.
81.6	QEII National Trust - Alice Shanks	Australian sedge is now in Canterbury. It is recorded on www.naturewatch.org.nz as growing with Landcare and Lincoln University grounds.	Support in part  Amend the RPMP to treat Australian sedge as an Elimination species since it has now naturalised at sites in Canterbury.	Reject	Staff have contacted Landcare Research to confirm this presence and they have identified that this is Carex divulsa (grey sedge), not Australian sedge.
82.4	Ministry for Primary Industries - Sherman Smith	In contrast to these we noted there are pests that have boundary control rules, such as Chilean needle grass and wilding conifers that are not designated as GNR.	Amend Chilean needle grass and wilding conifer provisions in the RPMP to designate these as GNR to provide consistency within the plan.	Accept in part	Staff do not consider that Chilean needle grass requires a Good Neighbour Rule, as there are no Crown held properties that have been identified as being infested with Chilean needle grass.  Other submissions have been received requesting that a Good Neighbour Rule is included for wilding conifers, and staff agree that this addition is appropriate. See submission point 74.1 for proposed wording.
84.1	Gibson, Bill	Having farmed 25 years where Old Man's beard was growing for years, indicated by circumference of the vine I have found it is being confined to its original area by frosts and grazing animals. Native vines and Old Mans beard occupy similar areas and are part of the biodiversity .Native vines being hardy spread outside Old Mans Beard areas and cover more treesAs landholders are also part of the	Delete Old Man Beard rules as they are going to cause stress and unnecessary costs.	Reject	Old man's beard is recommended to be managed in the RPMP due to the adverse effects on environmental and amenity values. It is capable of smothering and killing all plants to the highest canopy and preventing the establishment of native plant seedlings. It is spread by both wind and water, and it can grow up to 20 metres tall.

		diversity and rules are going to cause stress and unnecessary costs.			
85.4	New Zealand Defence Force - Stephen Phillipson	Chilean Needle Grass (CNG) under a boundary control rule of 10m has been known to spread to adjoining properties, therefore have a 5m boundary control zone in the proposed CRPMP will not achieve the objective of preventing the spread to nearby properties.	Support in part  Amend rule 6.4.8 (a) to require the elimination of all Chilean Needle Grass plants within 20 metres of an adjoining property boundary.	Reject	Technical advice provided by Graham Bourdot (AgResearch) has indicated that 5 metres is sufficient to mitigate the risk of spread to adjoining properties. The seeds fall near to the parent plant, and are not adapted to wind dispersal. The range of seed fall is between two to three metres from the parent plant. The council has a rigorous inspection process in place and also has a collaborative programme in place to prevent the spread and ensure that infestation levels do not increase.
85.5	New Zealand Defence Force - Stephen Phillipson	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.	Support in part  Amend rule 6.4.8 (b) to include clarification as to the extent of obligations a 'party' will be subject to under a Chilean Needle Grass Written Management Agreement.	Reject	It is not clear what the submitter is referring to in terms of the extent of obligations a party will be subject to under the agreement. However, in general it would be inappropriate to detail the obligations under the agreement as this may differ depending on the individual circumstances.
85.6	New Zealand Defence Force - Stephen Phillipson	As drafted, this rule would be difficult to monitor and enforce. 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).	Oppose  Delete rule 6.4.9, 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.	Reject	This rule is different from the 6.4.8(b) because there is no agreement or discretion for transporting Chilean needle grass seed beyond property boundaries.
88.7	Forest and Bird - Jen Miller	Support for Table 7 Plan Objective	Support  Retain the wording of plan objective 1	Accept	

89.1	Neal, Kim	<p>My submission relates to section 5 pest management frame work page 18 subsection 5.4 rules section 73(5) and 73(6) pages 19,20.</p> <p>I oppose the 10-20meter good neighbor rule because the good neighbor rule for stopping the spread of weeds doesn't work in hill country areas with water run off, carrying seeds over land into small streams that lead into bigger rivers. This water run off system picks up seeds from well inside property boundaries further back than the 10 or 20 good neighbor strip. We are having to spend a lot more time and money getting rid of weeds that grow on the banks of the river that runs through our property than we used to.</p> <p>The decision that Ecan could make is to help affected land owners with the control of getting rid of these water spread weeds along river banks.</p>	Amend the RPMP to provide assistance to affected land owners to get rid of water spread weeds along river banks.	Reject	We note the submitter's point regarding seed spread via waterways, but unfortunately there is not enough information regarding specific pests or situations to respond specifically. However, depending on the pests in question, some require management internally within boundaries and may provide relief to the submitter's concerns.
90.1	Johnstone, Robert	Not enough account is taken for the effect of wind on seed spread also birds. I have wilding pines (only a few) on Ashley Gorge which could only have become established from wind blown seed from Lees Valley 6km to the north-west. Similarly with broom on the back of the property, which clearly came from wind blown seed on what is now DOC land of Mt Oxford about 3/4 km westward and upstream. And on my flats I am infested with Old Man's Beard in a new plantation from wind borne-seed from the Crown riverbed (LINZ) where no control is or has ever been undertaken	Amend provisions in the RPMP to ensure that property owners downwind of established seed sources should not be held responsible for infestations they have no control of particularly if the source is from Crown Land being neglected.	Note	Boundary rules have been provided for broom, old man's beard and wilding conifers. The distances proposed are what staff consider to be fair and reasonable.

90.9	Johnstone, Robert	Council Reserves - these are not mentioned, but are widespread throughout Canterbury - mostly old gravel pits, which are now infested with G&B, blackberry & nodding thistles.	Amend the RPMP to consider pest management at Council Reserves	Note	Council Reserves are subject to the rules in the RPMP, as private occupiers are. This is a matter of implementation, it is also worth noting that staff propose to establish a closer working relationship with territorial authorities regarding pest management.
90.16	Johnstone, Robert	Boundaries - In general terms I support the current boundary rules as they apply to G&B and Roadsides . The current 40 metre boundary rule for nodding thistle is not practical and other "distance" thresholds should be carefully examined to take account of wind which is far more of a factor than is appreciated.. Again ,if it is to be included it should be enforced Ecan have been unwilling or unable to enforce G&B boundary rules on part of my property which meant I had to spray the offending fence line myself and at my expense ( two loads with the helicopter--- \$800 -- and no thanks)	No specific decision requested	Note	The boundary rules for gorse and broom are Good Neighbour Rules, they will be enforced so long as they meet the criteria stipulated in the National Policy Direction for Good Neighbour Rules (spread across the boundary is occurring and causing unreasonable costs to an adjacent occupier, who is undertaking active management of that pest).
90.20	Johnstone, Robert	Rabbits - the introduction of RHD has had a huge beneficial impact across all rabbit prone regions in Canterbury. My understanding is that the effectiveness of the virus is lessening but another one has been identified and may well be introduced. My plea is to do everything in your power to encourage this introduction to hopefully give an enhanced level of rabbit control once again.	Ensure that the introduction of the new RHD virus is encouraged.	Note	See submission point 90.13

## Gorse and Broom

Number	Name	Submission	Relief	Staff Recommendation	Reasons
14.3	Loxton, Gavin	<p>Oppose, Broom - The microscopic broom gall mite (<i>Aceria genistae</i>), introduced in 2008, which turns broom buds into deformed lumps. The mite has become well established at early release sites, stunting broom growth and even killing entire plants. Therefore spraying of broom with herbicides should cease. The biocontrol's have been effective, any further ECan expenditure should be on monitoring the spread of the gall mite, and the other biocontrol's introduced for broom. What replaces the broom once the biocontrol's take affect will likely be the main issue in the following 10 years.</p>	<p>Oppose broom provisions in the RPMP, ECan expenditure should be on monitoring the spread of the gall mite, and the other biocontrol's introduced for broom.</p>	Reject	<p>Staff have discussed this matter with Hugh Gourlay (via phone 26 July 2017) and have been advised that biological control of plants such as broom gall mite provides slow long term control and would not prevent the production of seed in the short term, and therefore the spread of broom. While ideal for larger stands of broom, controlling isolated broom plants and patches less 50 sqm by other methods would provide better control and spread prevention in the short to medium term.</p>
18.15	Frank, Hermann	<p>Table 18 and Plan Objective 8 for broom is supported. The main impact of broom is described correctly, it also has a negative impact on wetlands, rocky outcrops and other specialised habitats for animals e.g. lizards. The same applies for gorse Table 24, so impacts on biodiversity needs to be added for these pests.</p>	<p>Amend gorse description to include the negative biodiversity impacts, on wetlands, rocky outcrops and other specialised habitats for animals e.g. lizards.</p>	Accept	<p>Staff propose to add a statement in the 'Description and adverse effects', per below for both gorse and broom:</p> <p><u>Gorse adversely impacts wetlands, rocky outcrops and other habitats</u></p> <p><u>Broom adversely impacts wetlands, rocky outcrops and other habitats</u></p>

18.16	Frank, Hermann	Objective 8 needs some alterations to the GNR and control of smaller infestations. As outlined earlier, the current Strategy had only limited success and stronger measures are needed. I suggest that the GNR for Plan Rule 6.4.5 and Plan Rule 6.4.7 the proposed distance is altered from 10m (the same as in the old plan) to a strip of 50m width.	Amend rules 6.4.5 and 6.4.7 to alter the proposed distance from 10m (the same as in the old plan) to a strip of 50m width.	Reject	Staff consider that this would impose unjustified costs to occupiers, and would far exceed the buffer distance required to manage spread to neighbours.
18.17	Frank, Hermann	In Plan Rule 6.4.6 the area currently proposed is 50 sqm as in the old Strategy. As above, this had only limited success and often small infestations had grown bigger than this size as this is just about 7m x 7m and no enforcement was possible any more. It is suggested that size of the area in the Plan Rule 6.4.6 is increased to 1000sqm. This is still only an infestation area of 25m x 20m, so still manageable.	Amend rule 6.4.6 to increase the size area to 1000sqm	Reject	Staff consider that 1000 square metres would impose significant and unreasonable costs to occupiers. Also, the objective for broom is a sustained control approach, if occupiers are required to eliminate infestations up to 1000 square metres, this could require the removal of significant amounts of broom, that has been compliant under rules to date. This land would also have accumulated a significant seed-bank of broom.
18.18	Frank, Hermann	Stricter control and enforcement are necessary. The same applies to Table 24 gorse.	Provide for stricter control and enforcement for gorse [and broom]	Reject	The submitter has not provided specific information regarding this request. Staff consider that the proposed rules for gorse and broom offer sufficient control, and provide for effective enforcement. However, due to the lack of specificity, staff would find benefit from receiving further evidence and hearing discussions at the hearing on this matter.
18.19	Frank, Hermann	For gorse, Plan Rule 6.4.13 and Plan Rule 6.4.14 the width needs to be change to 50m and 1000sqm respective (as for broom under the same rationale [see submission points 18.16 and 18.17] ).	Amend rules 6.4.13 and 6.4.14 to alter the proposed distance from 10m (the same as in the old plan) to a strip of 50m width, and 1000sqm respectively	Reject	See submission point 18.16 and 18.17

18.20	Frank, Hermann	Also, broom and gorse, as well as long property boundaries, is a problem along rivers and their small streams, as they can spread along the waterways, especially much further downstream. Not much consideration has been given to this.	Insert provisions to consider broom and gorse spread along rivers and their small streams, as they can spread along the waterways, especially much further downstream.	Reject	Staff acknowledge that water can transport seed. This should be addressed in the hill and high country by rule 6.4.6 and 6.4.14. These rules require the removal of incidence less than 50 square metres and will ensure removal near waterways and prevent the establishment of larger patches. Patches over 50 square metres will be established and will have shed seed which will survive in the soil for decades and provide a continual seed source in waterways. Including buffers on all waterways is regarded as impractical and potentially very costly. It is likely to be more cost efficient to remove infestations as they arise downstream. If such a rule were to be considered a detailed analysis and further consultation would be required to meet the requirements of the Act.
18.21	Frank, Hermann	The Plan might consider, if it is possible, to, upon application, to wave the compliance for gorse and broom where they are being established for the defined purpose as a nursery vegetation for native revegetation.	Insert provision to enable, upon application, to wave the compliance for gorse and broom where they are being established for the defined purpose as a nursery vegetation for native revegetation.	Accept	<p>We acknowledge that gorse and broom are used to regenerate native vegetation. However, in practice this may not be appropriate in all circumstances.</p> <p>The Act specifically provides for an exemption process where the Council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the Council considers appropriate. This is detailed in section 8.3 of the PRPMP. Staff recommend including an advice note in tables 18 and 24 advising users of the plan of this process. We propose the addition of the following:</p> <p>Advice Note:</p> <p><u>Section 78 of the Biosecurity Act 1993 provides that the council may exempt a person from a requirement in a rule, without conditions or on conditions that the council considers appropriate.</u></p> <p><u>The council may only grant an exemption if it is satisfied of the matters in section 78(2) and (4).</u></p>

25.5	Rayonier Matariki Forests - Steve Chandler	Rule 6.4.5 Page 43: Support	Supports Rule 6.4.5	Accept	
25.6	Rayonier Matariki Forests - Steve Chandler	<p>Rule 6.4.6 page 44: Support in part. In the Canterbury region plantation forest environment there are significant areas of broom and gorse infestation due to forest owners acquiring reverted farmland which was deemed unsuitable for agriculture due to the infestation. Forest owners undertake boundary control spraying with neighbours and during each successive forest rotation the gorse and broom under a closing forest canopy is suppressed and eventually dies. However at harvest the longevity of the seed enables a new crop of broom/gorse to germinate, this can be chemically controlled during the tree re establishment phase but it is not economically or environmentally practicable to continue to spray patches of gorse and broom within the forest after the 3 year re establishment phase. Gorse and broom is suppressed and dies out after canopy closure occurs (which is around 10-12 years after planting). This rule as it currently stands would put the majority of existing Canterbury plantati on forestry in breach of the rule.</p>	<p>Support in part</p> <p>Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.</p>	Accept in part	<p>Staff recognise that the management of gorse and broom in forestry situations is different to other productive land-uses, and that broom and gorse can be suppressed in closed canopy forests. A global exemption as outlined by the submitter may be appropriate. However, staff would benefit from further evidence and discussion at the hearing in order to develop recommended changes.</p>

25.9	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.14 Page 54: Support in part: Comments are the same as that for rule 6.4.6 [see submission point 25.6]	Support in part  Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.	Accept in part	See submission point 25.6
25.10	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.15 Page 54: Support in part: Comments are the same as that for rule 6.4.6 [see submission point 25.6]	Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.	Accept in part	See submission point 25.6
43.1	Couch, Rewi	<p>Part 11 Pest management Programs. Table 3.3 containment plant pests; Broom &amp; Gorse page 10: Broom page 44-45 7.5.1 - 5 and Gorse page 46-47 7.6.1-5</p> <p>I am making this submission as an advisory Trustee to Rapaki Maori Reserve 875 1A2B within the Lyttelton harbour catchment.</p> <p>"I oppose those parts of the plan identified above and wish to have them amended to enable greater land management options."</p> <p>At present we are considering land management plan options and I would like us to be able to consider a 100 year plan including native regeneration using gorse and broom as a nursery. These parts of the pest management plan restricts the opportunity to apply many alternative land management options. It restricts land use to grazing and applies a farming concept to all land use,</p>	<p>Oppose</p> <p>Amend gorse and broom provisions that enable us to allow gorse and broom to grow and spread in support of alternative land use options including regeneration. This would include internal gorse and broom spread but not boundary weed management when required by weed free neighbours.</p>	Accept in part	<p>We acknowledge that gorse and broom are used to regenerate native vegetation. Applicants can be exempted from rules under certain circumstances, this is detailed in section 8.3 of the PRPMP. Staff recommend to add an advice note to tables 18 and 24 highlighting that an application for an exemption from the rules may be made if considering using these species as a nursery crop. Refer to submission point 78.19 for the specific wording suggested.</p>

		<p>preventing regeneration of native forestry on land that is failing financially, culturally and environmental as a farming unit.</p> <p>I have been involved with this land since I was a child in the early 1950's when my grandfather farmed it, I have sprayed gorse that just grew right back again and again. To day we are forced to graze cattle that cause excessive erosion, dead animals and stock effluent fill the stream bed and flush into the harbour polluting the kai moana in our bay to deadly levels many hundreds of times above the safe level for human consumption.</p>			
52.4	Ledgard, Nick	Support gorse / broom as sustained control pest	Support No specific decision requested	Accept	
52.5	Ledgard, Nick	Not enough attention to prevention, 'stitch in time' control of gorse/broom in 'land presently free' of g/b A major spread mechanism for g/b seed is water in streams/rivers. Once seeds gets into these, control becomes very onerous. Hence, there is a need to detect new plants in currently g/b-free areas. This could be achieved by inspection of (eg., flights over) such areas in spring, when g/b flowering.	Amend objective 14 to provide Greater 'stitch in time' effort in g/bfree areas to detect and remove isolated b/g plants, particularly in upper water-way catchments.		Staff consider that the rules requiring the elimination of scattered gorse and broom are sufficient to keep clear land clear, and prevent further seeds becoming spread through waterways.
52.6	Ledgard, Nick	Gorse and broom. A major spread pathway is via movement in gravel and shingle, often from quarries, or processed shingle piles (eg., as part of road maintenance). Users of processed shingle should be able to find out whether g/b seed is likely to	Amend the RPMP to require information on likelihood of g/b presence available to purchasers of processed shingle/gravel.	Note	The PRPMP does already provide the mechanism to enforce the movement of gorse and broom seed in gravel resources. It is acknowledged that this activity can establish new sites of infestations if not managed in the receiving environment. We propose that this is managed outside the RPMP process, via pathway management plans.

		be present. It is common practice these days for purchasers of any product to be informed of ingredients, particularly if considered harmful. If this is not done, it defies principles stated in 5.3, 1e (P19) (e) 'pests are not to be spread (propagated, sold, distributed), and pathways are to be managed (eg, machinery, gravel, animals).'			
53.10	Rural Advocacy Network - Jamie McFadden	50m2 rule for gorse and broom. (pages 43, 44 & 52-54) We support the intent behind this rule which is that landowners are encouraged to undertake on going control of broom and gorse within their properties. However it has been problematic for three reasons. The first is that it doesn't provide any control incentive for landowners with extensive areas of broom and gorse (over 50m2). The second is that it creates a perverse incentive for landowners to allow areas to expand over the 50m2 threshold and thus beyond the compliance regime. The third issue is that landowners with an intensive control programme on large areas of gorse and broom end up being non-compliant as the areas get smaller. This could be resolved with a more pragmatic approach to the inspection regime that takes into account the whole farm programme & extent of control work undertaken in previous years. If this cannot be done then we oppose the inclusion of this rule.	Support in part  Amend provisions to enable a more pragmatic approach to the inspection regime that takes into account the whole farm programme & extent of control work undertaken in previous years.	Reject	The implementation of the rules sits outside the provisions of the RPMP, staff consider it may be appropriate to seek an exemption in this case. This may include an agreed programme which ensure that the objectives of the RPMP will still be met. For details of the Exemption process, refer to section 8.3 of the PRPMP.
55.2	Waiake Forestry Ltd - Alan Ogle	In our view, however the Plan as currently proposed, has ignored under "Section 6.4 Pests to be managed	Amend rules 6.4.5 and 6.4.13 to contain a specific exemption/ revised wording for trees in	Note	Staff recognise that the management of gorse and broom is a different situation to other productive land-uses, and that broom and gorse can be

under sustained control management” the practicalities of forest management. The Plan Rules 6.4.5 and 6.4.13, contain provisions where occupiers are required to “eliminate broom/ gorse infestations on their land within 10 metres of the adjoining property owner where the occupier is eliminating gorse infestations within 10 metres of that boundary...”

To explain our concern requires a more detailed explanation of the forestry provisions in the Banks Peninsular under Christchurch City Council’s (CCC) operative plan. Definitions of "Existing Forests" and "Forestry" are in the Definitions volume Part VII of the plan pages 348 and 349 (Copy attached). "Existing Forests" are those planted prior to Sep08 and replanted within 5 years of harvesting. These existing forests do not require a 10m setback from the boundary. All other forests are "Forestry" which has the 10m setback provisions as covered under "Forestry" in Appendix IX page 413

When managing “Existing Forests”, planting and replanting is normally undertaken to within 1 to 2 metres of the boundary. This overcomes the challenge of having a 10m boundary-weed zone and the consequent fire risks resulting from the unplanted weed prone area. If the boundary fence area contains broom or gorse on the forest growing side of the fence and has a weed free area on the neighbour’s side, we spray the broom/ gorse back the stumps of the first row of trees for the first 3 to 4 years of tree growth. With Radiata pine, tree

“Existing Forests” under the CCC District Plan, specifically we submit that:

That Plan Rule 6.4.5 on page 43 be amended by adding: The provisions of the 10 metre rule in the case of “Existing Forests” as defined in the CCC District Plan, be modified to be to eliminate broom within the area between the boundary and the stumps of the first row of trees, but not exceeding 10 metres, where Pinus radiata is planted as a plantation crop.

That Plan Rule 6.4.13 on pages 53/54 be amended by adding: The provisions of the 10 metre rule in the case of “Existing Forests” as defined in the CCC District Plan, be modified to be to eliminate broom within the area between the boundary and the stumps of the first row of trees, but not exceeding 10 metres, where Pinus radiata is planted as a plantation crop.

suppressed in closed canopy forests. We do not consider that a global exemption as outlined by the submitter is appropriate, as there may be further factors to take into consideration. An application can be made to Environment Canterbury for an exemption to the rules for broom and gorse in a forestry setting, for details refer to section 8.3 of the PRPMP.

		<p>shading of the forest site from year 4 normally means no further spraying of boundary broom/ gorse growth is necessary. The planted trees progressively smother and suppress light to any boundary broom/ gorse. Spraying to 10m as required in the RPMP is not practical as the normal chemical mixes (Grazon or Meturon/ glyphosphate), will also kill the emerging pine trees as broom/ gorse invariably grows intertwined with the pine trees.</p>			
60.1	Bleasdale, Chris	<p>I oppose the wording of the objective No. 14</p> <p>Detail of Decision Required and concerns to be addressed: The objective No. 14 does not recognise the fact that seeds are already present in many cases and have been in the ground for decades and should reflect this. Also, the wording of the objective should acknowledge that Landscape, Access and Biodiversity values are also adversely affected - not just production.</p>	<p>Oppose</p> <p>Amend objective 14 to recognise the fact that seeds are already present in many cases and have been in the ground for decades, it should acknowledge that Landscape, Access and Biodiversity values are also adversely affected.</p>	Accept in part	<p>The description in table 24 already notes that "The plant may seed twice per year. Seed may survive in the soil for more than 50 years. Staff recommend including the following text in the Description and adverse effects: <u>Gorse adversely impacts wetlands, rocky outcrops and other habitats</u> (as a result of submission point 18.15)</p>
60.5	Bleasdale, Chris	<p>The continuing attitude by ECan towards landowners with respect to Gorse Control is extremely disappointing. This is a major problem for New Zealand in general and Canterbury in particular which ECan have failed to address in a proper way. Ecan continues to take the path of least resistance and target the current land owner who in most cases are not responsible for the problem. In my opinion a quantum shift in ECan's attitude is needed if there is to be any</p>	<p>Amend Gorse provisions to recognise this needs to be a shared problem with a collaborative approach, not a draconian regime based on penalties for non-compliance.</p>	Reject	<p>The RPMP sets the minimum requirements for occupiers to ensure that land free of, or being cleared of gorse does not become reinfested and production values are not adversely affected. Where gorse is managed in site-led programmes to address biodiversity as well as production values, a collaborative and council-led programme is undertaken.</p>

		chance of gaining any ground on this issue. This needs to be a shared problem with a collaborative approach, not a draconian regime based on penalties for non-compliance.			
67.6	Selwyn District Council - Lisa Arnott	Selwyn District Council supports The Council recognises the need to prevent gorse and broom from encroaching into reserve areas, and supports the proposed mechanisms to control these species.	Support No specific decision requested	Accepted	
71.1	Graham, Peter	The 50 square metre is not practical on hill country and should be removed	Oppose Delete Rule 6.4.14	Reject	Staff would appreciate further evidence on this matter in order to respond.
77.16	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 8 and related good neighbour rule 6.4.5 seeking the sustained control of Broom to preclude land that is free of, or being cleared of broom, becoming infested. Sustained control will ensure effects of Broom on production values are minimised.	Support Retain objective 8, and good neighbour rule 6.4.5.	Accept	
77.19	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 14 and related good neighbour rule 6.4.13 seeking the sustained control of Gorse to preclude land that is free of, or being cleared of gorse, becoming infested. Sustained control will ensure effects of Gorse on production values are minimised.	Support Retain objective 14, and good neighbour rule 6.4.13.	Accept	
77.22	Land Information New Zealand (LINZ) - Maurice	LINZ supports objective 20 and related Maps 7.3 and 7.4 seeking site	Support	Accept	

	Dale	led sustained reduction of Broom by 10% within the upper Rangitata and Rakiatia catchments. Site led sustained control will ensure the effects of Broom on biodiversity and production values are minimised.	Retain objective 19, and maps 7.3 and 7.4.		
78.17	Department of Conservation - David Newey	Spartium junceum, commonly known as Spanish broom appears to be an omission. It is another invasive species and is expanding its range.	Support in part  Amend broom provisions to include this species	Accept	Staff accept this request and recommend that where species of broom are listed in the PRPMP, Spanish broom is inserted.
78.19	Department of Conservation - David Newey	On Public Conservation Land gorse is often used as a nurse crop for native plant restoration. This is a better alternative for conservation as it avoids use of expensive herbicides. Allowing reversion to native cover eliminates gorse from a site meeting plan Objective 14. Where herbicides are used the site often reverts back to gorse.	Support in part  Amend objective 14 to recognise that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective.	Accept in part	We acknowledge that gorse and broom are used to regenerate native vegetation. However, in practice this may not be appropriate in all circumstances. The Act specifically provides for an exemption process where the Council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the Council considers appropriate. This is detailed in section 8.3 of the PRPMP. Staff recommend including an advice note in tables 18 and 24 advising users of the plan of this process. We recommend the addition of the following:  Advice Note:  <u>Section 78 of the Biosecurity Act 1993 provides that the council may exempt a person from a requirement in a rule, without conditions or on conditions that the council considers appropriate.</u>  <u>The council may only grant an exemption if it is satisfied of the matters in section 78(2) and (4).</u>
78.20	Department of Conservation - David Newey	As above gorse can be a nurse crop in some situations	Support in part  Amend objective 14 Principal measure to be used to recognise that in some situations gorse used as a nurse crop will result in native	Accept in part	See submission point 78.19

			plant cover and over time will eliminate gorse from a site, meeting the plan objective.		
78.21	Department of Conservation - David Newey	Recognition that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective. The Director General notes that Crown agencies are not bound by this rule.	Support in part  Amend rule 6.4.14 to not require private land occupiers to meet the requirements of this rule in situations where they are restoring native vegetation cover using gorse as a nurse crop.	Accept in part	See submission point 78.19
78.22	Department of Conservation - David Newey	Should not be hedges within 10m of Public Conservation Land as these contribute to ongoing seed source and spread.	Support in part  Insert rule to prohibit (new) gorse hedge within 10 of public conservation land where gorse is being controlled	Reject	Email correspondence with K Briden 26 July 2017 confirmed that this submission point relates only to new gorse fences. The planting of new gorse hedging is prohibited under Sections 52 and 53 of the Biosecurity Act, which prevent people from selling, propagating or distributing any pest, or part of a pest, covered by the Plan.
79.21	Christchurch City Council - Brenda Greene		Support in part  Insert new rule into table 24 [gorse]:  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	Accept in part	We acknowledge that gorse and broom are used to regenerate native vegetation. Applicants can be exempted from rules under certain circumstances, this is detailed in section 8.3 of the PRPMP. Staff recommend to add an advice note to tables 18 and 24 highlighting that an application for an exemption from the rules may be made if considering using these species as a nursery crop. We recommend the addition of the following:  Advice Note:  <u>Section 78 of the Biosecurity Act 1993 provides that the council may exempt a person from a requirement in a rule, without conditions or on conditions that the council considers appropriate.</u>  <u>The council may only grant an exemption if it is satisfied of the matters in section 78(2) and (4).</u>

			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.		
85.3	New Zealand Defence Force - Stephen Phillipson	Steams 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.	Support in part  Amend gorse and broom provisions to require up-stream properties to control broom and gorse around the margins of waterways that cross boundaries as well as along fence-lines.	Reject	Staff acknowledge that water can transport seed. This should be addressed in the hill and high country by rule 6.4.6 and 6.4.14. These rules require the removal of incidence less than 50 square metres and will ensure removal near waterways and prevent the establishment of larger patches. Patches over 50 square metres will be established and will have shed seed which will survive in the soil for decades and provide a continual seed source in waterways. Including buffers on all waterways is regarded as impractical and potentially very costly. It is likely to be more efficient to remove infestations as they arise downstream. If such a rules were to be considered a detailed analysis and further consultation would be required to meet the requirements of the Act.
90.2	Johnstone, Robert	The viability of seed, particularly Gorse and Broom (G&B) is amazing. There are literally millions of viable seeds still there waiting for the right conditions to germinate.	No specific decision requested	Note	
90.10	Johnstone, Robert	Gorse & Broom - where a property owner is or has undertaken a control programme on a (compliant) block of G&B they should not be penalized if they missed a few plants (now non compliant)	Amend the RPMP to ensure that property owners are not penalized for missing a few plants.	Reject	Biosecurity Officers consider individual circumstances during the enforcement process, and are guided by internally developed procedures to ensure consistent application. It is not possible to amend the rules to cater for implementation discretion.

Number	Name	Submission	Relief	Staff Recommendation	Reasons
34.1	Apiculture New Zealand - Karin Kos	<p>ApiNZ is interested in the proposed rules around gorse and broom in the RPMP. Gorse and broom are key pollen bearing plants for bees in Canterbury and are concerned about the removal of these key plants.</p> <p>We understand that the intent of gorse and broom in the RPMP is to stop these plants reinfesting areas of Canterbury that are clear or have been cleared of gorse and broom, rather than enabling the further removal of these key pollen bearing plants in Canterbury.</p> <p>ApiNZ wishes ECan to note the key benefits of gorse and broom for bees are as a pollen source and have concerns about spray management practices on these plants.</p> <p>ApiNZ notes the gorse hedge and boundary requirements for gorse and broom and the area size restrictions that are in place.</p> <p>ApiNZ supports the retention of gorse and broom in the RPMP.</p>	No specific decision requested	Note	Background comment with no specific decision requested.
34.2	Apiculture New Zealand - Karin Kos	<p>ApiNZ wishes to note that broom, gorse and willow are key pollen bearing plants for bees in Canterbury. Willow in particular has some of the highest protein available for healthy bee development. While recognising that broom and gorse are problematic in some areas and restricting spread is a key part of the RPMP, we need to</p>	<p>Amend provisions in the RPMP to ensure that spray management programmes for control of gorse and broom should be completed when the plants are not flowering and when bees are not present - Targeted spraying only and at times when bee traffic is at its lowest during the early morning and/or</p>	Reject	<p>Staff consider inserting conditions for spray management of gorse and broom goes beyond the function of the RPMP, the RPMP does not specify how pests are to be controlled. Generally the application of control (discharge of chemical) is covered by other planning mechanisms (Resource Management Act 1993). It would also be a condition that the council would be unable to actively enforce.</p>

		<p>strike a fine balance between the necessity to spray for weed control and the requirement to retain vegetation as a nutritional resource for bees. These plants fill a critical gap as sources of food for bees until such time as other seasonal sources of pollen and nectar are available to replace them.</p> <p>Spraying of gorse and broom is the most likely method of control for gorse and broom. ApiNZ wishes ECan to note that spraying when gorse or broom is flowering presents a massive risk to bees. They respect no boundary and will fly up to five kilometres in good conditions to collect nectar and pollen. Please note, just because you cannot see a beehive nearby, it does not mean that bees are not present working the plants or nearby nectar or pollen sources.</p>	<p>early evening; and when appropriate wind conditions prevail that ensure minimal spray drift.</p>		
65.1	Trees for Bees - Ross Little	<p>I ask whether it is within the Regional Council's mandate to deal with weeds on private property where there are no spillover effects; the gorse plants provide significant benefits; or the landowner has not requested assistance? Elsewhere in the document, figures on compliance with gorse control rules reveal approx. 90% of affected landowners were non-compliant. I suspect a large number of those were noncompliant with this "scattered plants" rule, rather than the boundary rules. Therefore, I ask, does it work? I wish to raise five different situations where I believe this Rule is counterproductive.</p>	<p>Oppose</p> <p>Delete rule 6.4.14</p>	Reject	<p>Staff acknowledge the critical role of bees in our natural environment. However, mitigating adverse effects on productive land and protecting both past investment and preventing significant costs in the future is also important. In meetings held in lead up to the notification of the PRPMP, the community provided a clear desire for the council to not significantly reduce regulation of gorse and broom.</p>

1. **Bee Nutrition.** Many species have been rigorously tested for the protein content of their pollen for bee nutrition and the time of the year they flower. Our results have revealed gorse is very important, as it is probably the best plant to provide good nutritious pollen for bees during the “off-season”. Gorse flowers around or even during winter months when there is little else available. Extending the season for the bees enables them to build up their hives earlier in the spring and work later in the autumn.
2. **Unreasonable On-Farm Costs.** have become aware of the impracticality it creates in hill and high country, by requiring extra travelling around hill and high country properties to attend to scattered bushes rather than all the gorse in the immediate vicinity, including regrowth and larger patches. A more workable option is to deal with a property’s gorse problem on the basis of the location of the gorse, over two or three seasons when required.
3. **Intractable Terrain.** There are large areas of intractable terrain where little else but gorse or broom will grow. Spraying such areas, whether small patches or large, is not only a waste of time and money, but can also exacerbate erosion problems.
4. **Regenerating Indigenous Species.** Where native species

occur in difficult terrain, e.g. remnant bush in gullies or on steep slopes, and gorse or broom require control, it is hard to avoid accidental drift, which can kill indigenous bushes and trees. Under suitable conditions, gorse and broom can also be useful as a cover crop for regenerating natives.

5. Carbon Sequestration. Finally, the development of carbon sequestration efforts to alleviate climate change threats could also include scrubby weeds. While there are no financial rewards for landowners with gorse and broom, it does pose a moral question when weighing costs and benefits: in the light of ongoing research and evidence, should E-Can still be as concerned with controlling weeds for production purposes on private land as we are about the global climate issue.

Cost/Benefit Study: I have looked through Simon Harris' analysis and have found that significant costs and benefits of gorse control (or not) as described above, do not appear to have been included in the calculations, the indirect costs to beekeepers and those who benefit from healthy bees, or in the case of carbon sequestration, under political considerations. There has been a colossal amount of money wasted on spraying gorse without the necessary follow-up work. The incentive to control gorse (and broom) could be replaced by promoting awareness of

		the serious costs of losing control of these weeds, using case studies and other work to demonstrate best practice and effectively disseminating the results.			
65.1	Little, Ross	<p>I ask whether it is within the Regional Council’s mandate to deal with weeds on private property where there are no spillover effects; the gorse plants provide significant benefits; or the landowner has not requested assistance? Elsewhere in the document, figures on compliance with gorse control rules reveal approx. 90% of affected landowners were non-compliant. I suspect a large number of those were noncompliant with this “scattered plants” rule, rather than the boundary rules. Therefore, I ask, does it work? I wish to raise five different situations where I believe this Rule is counterproductive.</p> <ol style="list-style-type: none"> <li>1. Bee Nutrition. Many species have been rigorously tested for the protein content of their pollen for bee nutrition and the time of the year they flower. Our results have revealed gorse is very important, as it is probably the best plant to provide good nutritious pollen for bees during the “off-season”. Gorse flowers around or even during winter months when there is little else available. Extending the season for the bees enables them to build up their hives earlier in the spring and work later in the autumn.</li> <li>2. Unreasonable On-Farm Costs.</li> </ol>	<p>Oppose</p> <p>Delete rule 6.4.14</p>	Reject	<p>Staff acknowledge the critical role of bees in our natural environment. However, mitigating adverse effects on productive land and protecting both past investment and preventing significant costs in the future is also important. In meetings held in lead up to the notification of the PRPMP, the community provided a clear desire for the council to not significantly reduce regulation of gorse and broom.</p>

have become aware of the impracticality it creates in hill and high country, by requiring extra travelling around hill and high country properties to attend to scattered bushes rather than all the gorse in the immediate vicinity, including regrowth and larger patches. A more workable option is to deal with a property's gorse problem on the basis of the location of the gorse, over two or three seasons when required.

3. Intractable Terrain. There are large areas of intractable terrain where little else but gorse or broom will grow. Spraying such areas, whether small patches or large, is not only a waste of time and money, but can also exacerbate erosion problems.
4. Regenerating Indigenous Species. Where native species occur in difficult terrain, e.g. remnant bush in gullies or on steep slopes, and gorse or broom require control, it is hard to avoid accidental drift, which can kill indigenous bushes and trees. Under suitable conditions, gorse and broom can also be useful as a cover crop for regenerating natives.
5. Carbon Sequestration. Finally, the development of carbon sequestration efforts to alleviate climate change threats could also include scrubby weeds. While there are no financial rewards for landowners with gorse and broom, it does pose a moral

		<p>question when weighing costs and benefits: in the light of ongoing research and evidence, should E-Can still be as concerned with controlling weeds for production purposes on private land as we are about the global climate issue.</p> <p>Cost/Benefit Study: I have looked through Simon Harris' analysis and have found that significant costs and benefits of gorse control (or not) as described above, do not appear to have been included in the calculations, the indirect costs to beekeepers and those who benefit from healthy bees, or in the case of carbon sequestration, under political considerations. There has been a colossal amount of money wasted on spraying gorse without the necessary follow-up work. The incentive to control gorse (and broom) could be replaced by promoting awareness of the serious costs of losing control of these weeds, using case studies and other work to demonstrate best practice and effectively disseminating the results.</p>			
65.2	Trees for Bees - Ross Little	See submission point 65.1	<p>Oppose</p> <p>Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, where beehives are sited for nutrition during the months of April to August and there is no risk of spillover effects for neighbours or from livestock dispersing seed.</p>	Reject	Staff consider that this is best managed on a case by case basis. The Act specifically provides for an exemption process where the council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate. This is detailed in section 8.3 of the PRPMP.
65.2	Little, Ross				

		See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, where beehives are sited for nutrition during the months of April to August and there is no risk of spillover effects for neighbours or from livestock dispersing seed.	Reject	Staff consider that this is best managed on a case by case basis. The Act specifically provides for an exemption process where the council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate. This is detailed in section 8.3 of the PRPMP.
65.3	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 farm properties where a farm gorse management plan exists.	Reject	The implementation of the rules sits beyond the provisions of the RPMP. In cases where occupiers seek to establish a farm gorse management plan, it may be appropriate to seek an exemption (see submission point 65.2 for details).
65.3	Little, Ross	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 farm properties where a farm gorse management plan exists.	Reject	The implementation of the rules sits beyond the provisions of the RPMP. In cases where occupiers seek to establish a farm gorse management plan, it may be appropriate to seek an exemption (see submission point 65.2 for details).
65.4	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, sites where native regeneration is advantaged by the presence of gorse, or the risks to indigenous species from spray drift is significant.	Accept in part	We acknowledge that gorse and broom are used to regenerate native vegetation. However, in practice this may not be appropriate in all circumstances. The Act specifically provides for an exemption process where the Council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the Council considers appropriate. This is detailed in section 8.3 of the PRPMP. Staff recommend including an advice note in tables 18 and 24 advising users of the plan of this process. We propose the addition of the following:  Advice Note:

					<p><u>Section 78 of the Biosecurity Act 1993 provides that the council may exempt a person from a requirement in a rule, without conditions or on conditions that the council considers appropriate.</u></p> <p><u>The council may only grant an exemption if it is satisfied of the matters in section 78(2) and (4).</u></p> <p>Staff consider that chemical application should be undertaken in such a way that prevents adverse affects on native species. However, this could be considered on a case by case basis via the exemption process, for details, refer to submission point 65.2 for details.</p>
65.4	Little, Ross	See submission point 65.1	<p>Oppose</p> <p>Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, sites where native regeneration is advantaged by the presence of gorse, or the risks to indigenous species from spray drift is significant.</p>	Accept in part	<p>We acknowledge that gorse and broom are used to regenerate native vegetation. However, in practice this may not be appropriate in all circumstances. The Act specifically provides for an exemption process where the Council may exempt a person from a requirement in a rule in specified circumstances, on conditions that the Council considers appropriate. This is detailed in section 8.3 of the PRPMP. Staff recommend including an advice note in tables 18 and 24 advising users of the plan of this process. We propose the addition of the following:</p> <p>Advice Note:</p> <p><u>Section 78 of the Biosecurity Act 1993 provides that the council may exempt a person from a requirement in a rule, without conditions or on conditions that the council considers appropriate.</u></p> <p><u>The council may only grant an exemption if it is satisfied of the matters in section 78(2) and (4).</u></p>

					Staff consider that chemical application should be undertaken in such a way that prevents adverse affects on native species. However, this could be considered on a case by case basis via the exemption process, for details, refer to submission point 65.2 for details.
65.5	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, areas where the terrain makes land infested with gorse naturally unproductive regardless of the weeds.	Reject	This situation would be considered during implementation of the rules and assessed against the objectives of the programme.
65.5	Little, Ross	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, areas where the terrain makes land infested with gorse naturally unproductive regardless of the weeds.	Reject	This situation would be considered during implementation of the rules and assessed against the objectives of the programme.
65.6	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, land areas infested with gorse which may have value for carbon sequestration, including forestry	Reject	This is likely to be already be covered by the rule, as there is no requirement to eliminate gorse infestations once they cover more than 50 square metres in area.
65.6	Little, Ross	See submission point 65.1	Oppose  Alternative relief sought if that in	Reject	This is likely to be already be covered by the rule, as there is no requirement to eliminate gorse infestations once they cover more than 50 square

			point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, land areas infested with gorse which may have value for carbon sequestration, including forestry		metres in area.
65.7	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Amend the RPMP to to simplify the Exemption processes for the situations submitted on above [submission points 65.1 - 65.6].	Note	Staff have recommended that the exclusions from rules are managed through the exemption process (detailed in Section 8.3). See submission point 65.2 for details.
65.7	Little, Ross	See submission point 65.1	Oppose  Amend the RPMP to to simplify the Exemption processes for the situations submitted on above [submission points 65.1 - 65.6].	Note	Staff have recommended that the exclusions from rules are managed through the exemption process (detailed in Section 8.3). See submission point 65.2 for details.
66.1	Trees for Bees - Dr. Linda Newstrom-Lloyd c/f Ross Little	Gorse is a keystone plant that provides pollen to the honeybees at critical times when there is little else flowering in the South Island and most of the North Island. After 7 years of Trees for Bees field work, we have not been able to find another plant species that can provide the abundance and quality of pollen that gorse provides in the autumn, through winter and in the very early spring before the willows blossom. This problem is more serious in the South Island than the North Island because the South Island has much less diversity of native or exotic species that will provide pollen for the bees at these times. The most critical issue is the timing of gorse flowering when there are almost no other quality alternatives.	Oppose  Delete rule 6.4.14	Reject	Staff acknowledge critical role of bees in our natural environment. While it is important that gorse is managed to mitigate adverse effects to production values, it may be appropriate for occupiers to apply for an exemption to rule 6.4.14 for the purpose of beekeeping (see section 8.3 for details).

Artificial feed is not a substitute for fresh natural pollen because bee health is best supported by their natural food (Di Pasquale et al. 2013, DeGrandi-Hoffman et al. 2015). Pollen substitutes and supplements are already overused in New Zealand due to the overstocking and overcrowding issues in the beekeeping industry (Newstrom-Lloyd 2017), therefore it is essential to conserve and replace as much natural pollen as possible to support bee health for pollination services.

When gorse is removed or the flowers of gorse hedgerows are cut off before flowering, the bees are deprived of a traditional pollen source that has historically sustained bees over winter and provided good reliable population build up in early spring. It is important to ensure no gaps in flowering with consequent population crashes so that colonies are able to reach peak population size in time for summer pollination services (primarily the seed industry in Canterbury as well as horticulture) and for honey harvesting which sustains the bees and the beekeeper's livelihoods.

66.2	Trees for Bees - Dr. Linda Newstrom-Lloyd c/f Ross Little	See submission point 66.1	<p>Oppose</p> <p>Alternative relief sought if that in point 66.1 is not granted, provide efficient and well-publicised Exemption processes for the situations for beekeeping pollen</p>	Note	See submission point 66.1
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			dearth.		
80.1	New Zealand Beekeeping Incorporated - Linda Bray	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	Declassify gorse and broom to not declare these as pests, and do not include further regulatory controls on gorse or broom.	Reject	Staff acknowledge critical role of bees in our natural environment. While it is important that gorse and broom are managed to mitigate adverse effects to production and environmental values, it may be appropriate for occupiers to apply for an exemption to rule 6.4.14 for the purpose of beekeeping (see section 8.3 for details).

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.

## Wilding conifers

Number	Name	Submission	Relief	Staff Recommendation	Reasons
6.7	Ross, Fraser Bell	Wilding conifers: here it is understood that such species are subject to the Biosecurity Act section 52 and 53. However douglas fir is not named on the Programme for containment.	Insert provisions to include Douglas fir in the programme for containment.	Reject	Douglas fir is intentionally not included in the list of named conifer species. There are significant economic reasons for not including Douglas fir and Pinus radiata in the list of specified pest conifers, primarily because this would be overly prohibitive to the forestry industry.
14.4	Loxton, Gavin	page 14, 4.1, Oppose, Pinus Contorta, The early growth stage control of pinus Contorta should be with controlled livestock grazing. As Contorta is the most palatable of the pine species , grazing programs developed for the susceptible sites should introduced first. An insect biocontrol investigation program should be considered for the non grazable areas, such as high altitude crown land and Department of Conservation land. Both of these programs would be considered longterm solutions to the wilding tree weed problem. To continue to spray the pine trees with herbicides in the short term will be very expensive, and likely to be only a containment exercise.	Oppose provisions for Pinus Contorta in the RPMP, grazing programmes for susceptible sites should be introduced first, an insect biocontrol investigation program should be considered for the non grazable areas.	Reject	Staff note that stock grazing along risk boundaries can be useful in managing young wilding conifers, but in high density areas of wilding conifers, grazing does not effectively manage the spread. Staff acknowledge that the current tool box is limited in terms of biological control for conifers, but we understand that research is being undertaken to produce a non-coning conifer tree.

20.5	Marlborough District Council - Jono Underwood	<p>MDC supports the concept behind the programme as articulated in the Proposal. However, the proposed programme wording and structure is difficult to follow and does not make it clear to the reader how the programme will be implemented. It is acknowledged that some of this detail may be outlined in an Operational Plan. For example, there is an objective to clear 900,000ha of land of wilding conifers. Whilst a reference is made to the National Wilding Conifer Control Programme under Principle Measures, the way the Proposal is currently drafted; it gives the impression that the national programme gives effect to the RPMP programme.</p> <p>There is also no clear link regarding costs/cost allocation detailed in the economic analysis and how these may/may not be related to the National Programme.</p>	<p>Support in part</p> <p>Clarify the structure and way the wilding conifer programme is drafted and structured to clearly articulate the relationship between the Environment Canterbury RPMP programme and the National Wilding Conifer Control Programme, including costs.</p>		<p>The National programme does assist in delivering the objective of the wilding conifer programme. Staff note that this component is being managed as part of the wider biosecurity programme. The rules in the RPMP provide the regulatory backstop to ensure that the areas cleared through the national programme are maintained. We do not consider that it is appropriate to detail the costs of the National programme, as this is contingent on ongoing partner and central government funding.</p>
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25.1	Rayonier Matariki Forests - Steve Chandler	<p>Progressive containment objective and selection of wilding conifer species to be contained.</p> <p>It is important economically that Douglas fir and Radiata pine are not included on the containment species list as they are key contributors to the economic viability of the plantation forest industry in New Zealand. Any potential or actual spread threat from these two species from plantation forests which are for productivity reasons usually sited on lower altitude land (below 600m) and on soil types below class 6 or 7 can be readily contained with timely intervention and management. In addition we support the exclusion of Pinus Ponderosa from the containment species list as this species can be used as a boundary or exposed ridgeline buffer planting when more spread prone species are planted. Pinus Ponderosa is very wind firm, long lived and is not a prolific seed bearing species. Young seedlings are also palatable to grazing animals reducing the risk of potential spread.</p>	<p>Support</p> <p>Retain progressive containment objective and selection of wilding conifer species to be contained and not include Douglas fir, Radiata pine, and Pinus Ponderosa on this list.</p>	Accept	
25.2	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.3.1 page 35: Support.	Supports Rule 6.3.1	Accept	

25.3	Rayonier Matariki Forests - Steve Chandler	<p>Plan Rule 6.3.2 page 36: Support in part. As managers of Hanmer forest RMF have on their North Eastern boundary areas of inaccessible legacy wilding conifers that border crown, Doc and private land which also contain legacy wilding conifers arising from erosion control plantings and spread from early spread prone Corsican pine and larch plantings which have or are being successively removed within RMF's Hanmer forest.</p> <p>If our neighbours decide to eradicate their wilding conifers along our boundary, obliging us to remove a 200m boundary this has the potential to result in accelerated soil erosion into our land area and result in a carbon liability cost.</p>	<p>Support in part</p> <p>Amend provision 6.3.2, rather than any breach being an offence, if neighbours can agree to and provide an approved combined management plan to manage and replace wilding conifers with alternative low spread prone carbon or erosion control species along their adjoining boundaries, then this should be given recognition in the plan.</p>	Reject	<p>Staff understand that this situation is likely to not occur often and this would be best handled through the Exemption process (see details in section 8.3). This way individual circumstances can be considered - so long as the objectives of the RPMP will still be met.</p>
28.1	Goldring, Maree	<p>It is important that this strategy maintains control of all wilding operations including the removal of those on Council reserves in communities. If it is left to a community under the auspices of a district council, using the vehicle of their reserves management plan can lead to a situation where personal views can overtake the requirements for all other land owners and occupiers under the regulations. It would allow a case of a community "wittingly allowing wilding spread". Neighbouring land would not then be "prevented from spillover" .</p>	<p>Ensure that control of wilding operations including the removal of those on Council reserve in communities is included in the RPMP.</p>	Accept in part	<p>While we are not recommending any amendments regarding Council reserves in communities, the Exemptions process is open for applicants, applications are considered on the basis that objectives in the RPMP are met. For more details regarding the Exemption process, refer to section 8.3 of the PRPMP.</p>

38.2	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	We agree with the purpose of the proposed Regional Pest Management Plan (RPMP) as stated in Section 1.2 and with the Objective 4 of the proposed Plan as stated on p.35.	Support  No specific decision requested	Accept	
38.3	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	<p>Rules that may be appropriate for the extensive high country estate (e.g. Rules 6.3.1 and 6.3.2 on pp.35 and 36) will have perverse effects if applied in a settlement area. For example, proposed Rule 6.3.2 could see all amenity plantings of conifers removed from the Village reserves, and possibly in a very short time frame, without any requirement for consulting the community.</p> <p>Castle Hill Village was planned and implemented in the late 1970s as an alpine village with special character, including a written consent requirement to plant 6070 exotic species as part of the development. Trees, including exotic trees, provide a range of amenity values in the Village: shade, wind protection, play areas for children, important for village bird life, and visual attractiveness. Anyone familiar with Castle Hill Village will know the landscape contribution of the larch trees, particularly in autumn.</p> <p>Unlike almost all the extensive high country, Castle Hill Village has active reserves management in place, underpinned by the Reserves Management Plan adopted in 2011. This plan is overseen by the Selwyn District Council, and has already been active for five years in removing</p>	Amend footnote 3 on page 15 and footnote 12 on page 35 to read: "Wilding conifers are any introduced conifer tree that has been declared by Ecan to have a significant risk of spreading, including ...."	Reject	Staff consider that this would limit the trees that could be considered as 'wilding'.

p.contorta and replacing with beech and other plantings.

The Village community has already agreed to the phased elimination of p. contorta over a time-frame that is currently under consideration, and well within the 10-year time-frame envisaged by the proposed RPMP. Furthermore, it has long been accepted by Village property owners that all trees in Village reserves require active management over time in order to optimise their amenity values.

The Reserves Management Plan is currently being reviewed by the Village. This will provide the opportunity not only for community consultation within the Village, but also to ensure that the Village RMP aligns with the proposed RPMP in terms of the latter's purpose and objectives, and cognisant of the level of risk associated with wildings in the Village.

We request that a duly revised Reserves Management Plan continue to be the primary instrument for managing wilding tree species in the Village, assuming that such revision:

(a) aligns the Village Plan with the purpose and objectives of the RPMP; and

(b) includes an explicit Good Neighbour Rule (As defined in the RPMP Glossary on p.99 and acknowledging specified criteria.) governing the pest management responsibilities as they relate to the relationship between the Village and

		<p>its rural neighbour properties, specifically Castle Hill Station and the Department of Conservation.</p> <p>With this in mind, we recommend that within residential settlement areas that have reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme<sup>5</sup>, wilding conifers be exempt from the Pest Management Plan provisions.</p>			
38.4	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	See submission point 38.3	<p>Amend rule 6.3.1 by adding a subclause (c) That amenity planting within council controlled reserves not be subject to this rule provided that there is a reserves management plan that:</p> <p>(a) aligns the Village Plan with the purpose and objectives of the RPMP; and</p> <p>(b) includes an explicit Good Neighbour Rule (As defined the RPMP Glossary on p.99 and acknowledging specified criteria.) in governing the pest management responsibilities as they relate to the relationship between the area covered by the plan and its rural neighbouring properties</p>	Reject	The intention of rule 6.3.1 is to ensure that ongoing maintenance is undertaken in the area where public funds have been used to control wilding conifers. Because a control operation is unlikely to be undertaken in an area seeking to protect conifer trees, we do not consider that this amendment is required.
38.5	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	See submission point 38.3	Amend rule 6.3.2 by adding except that any reserve subject to clause (c) of Rule 6.3.1 shall be exempt from this rule	Reject	Staff note that there may be inconsistencies with Reserve Management Plans across territorial authorities. Staff would benefit from further evidence and discussion at the hearing. However, initial consideration is that this may best be handled under the Exemption process (refer section 8.3 of the PRMP), this enables the council to exempt a person from a requirement in a rule in specified

					circumstances, on conditions that the council considers appropriate.
39.1	Summit Road Society Inc. - John Goodrich	<p>We wish to amend the list of pests by including spur valerian (<i>Centranthus ruber</i>), tree lucerne (<i>Cytisus proliferus</i>) and Douglas fir (<i>Pseudotsuga menziesii</i>).</p> <p>All these have a marked impact on the regeneration of native plant species. Spur valerian is becoming a serious threat to important and in some cases threatened plants on rocky bluffs and cliffs on Banks Peninsula and the Port Hills.</p>	Amend provisions to include spur valerian, tree lucerne and Douglas fir on the list of pests	Reject	See submission points 39.2 and 39.3 for details
39.2	Summit Road Society Inc. - John Goodrich	We want Douglas fir ( <i>Pseudotsuga menziesii</i> ) to be added to the list of pests to be dealt with by progressive containment.	Amend provisions to add Douglas fir to the list of pests to be dealt with by progressive containment.	Reject	There are significant economic reasons for not including Douglas fir and <i>Pinus radiata</i> in the list of specified pest conifers, primarily because this would be overly prohibitive to the forestry industry.
48.1	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Wilding conifers, due to their characteristics of size, seeding capabilities and ease of removal, can be eradicated from an area much more readily than other pest species. This is recognised nationally under the New Zealand Wilding Conifer Management Strategy which “aims to prevent the spread, contain or eradicate wilding conifers by 2030”. A progressive containment programme in Canterbury is unlikely to achieve the aim of the national strategy by this date.</p> <p>There is little point in trying to “contain” wilding conifers – particularly lodgepole/<i>contorta</i> which can spread more rapidly than any other conifer</p>	<p>Oppose</p> <p>Amend Table 3: Organisms classified as pests, as follows: Pg15 – In Table 3, amend the Primary programme from ‘Progressive Containment’ to ‘Eradication’</p>	Reject	<p>There are areas within the Wilding Conifer Zone that will be managed to achieve an eradication objective (where technically feasible), noting that this will be achieved by proactive control work that is not detailed in the RPMP (The National Wilding Conifer Control Programme). However, the RPMP seeks to protect the investment of this programme.</p> <p>It is not achievable to meet the eradication objective within the Wilding Conifer Zone over the life of the RPMP as this relies on significant ongoing funding of the proactive control programme from all funders.</p>

species, out to distances of many kilometres from the seed source. An attempt at “containment” of wilding conifers will continue, ad infinitum, to cost inordinate amounts of money to remove the wildings generated from any new, growing, seed-source.

Eradication should be the primary pest management programme for wilding conifers under the pRPMP. An eradication programme is the most cost-effective use of taxpayer and ratepayer money overtime. This is recognised by DoC who list wilding conifers as Enemy Number 1 in their War on Weeds and the allocation of \$16 million over 4 years through MPI for a national control programme.

WELRA supports ECan’s commitment to removing wilding conifers and their seeding sources from the region but proposes that, by working in partnership with communities, central government agencies, and other donors, that eradication of wilding conifers is possible and should be the aim of the pRPMP.

The wilding conifer invasion has an end-point which will be achieved when all seed-source trees and their pre-coning progeny are removed. As the soil seed bank is short-lived (cf., gorse and broom), if these emerging trees are removed before coning age, then the wilding conifer issue ceases to exist. The cost of controlling wilding conifers per hectare does not change between progressive containment and eradication programmes – the only real difference is the wildings that are targeted and volume of work

required.

The control costs for wilding conifers increases significantly for each year that the trees are left to grow and spread. A policy of containment in the pRPMP will not support the national strategy and will burden ratepayers with ever mounting costs for future generations.

In addition, the full environmental and social cost of wilding conifers is not considered in the cost-benefit analysis undertaken for this Proposal. One of the most significant impacts of wildings is on natural landscape values. Canterbury is home to nationally significant vistas and landscapes, most of which are under threat from wildings. While it is not possible to calculate the financial cost, the loss of these landscapes would have major economic as well as environmental and social impacts.

It is financially imperative therefore to invest funds into early eradication. Equally important is the requirement to instigate and implement a supportive legislative system that directs the removal of all wildings conifers and supports the investments made into eradication to date. Consequently, WELRA submits that the Proposal is amended so that the Primary pest management programme for wilding conifers is Eradication.

48.2

Waimakariri  
Ecological and  
Landscape  
Restoration

See submission point 48.1

Oppose

Insert in Table 3, 'Yes' into the Good

Accept

See submission point 74.1 for details of the proposed inclusion of a good neighbour rule for Wilding Conifers.

	(WELRA) - Neil Walkinshaw		Neighbour Rule (see submission point 48.4 for details)		
48.3	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	See submission point 48.1	<p>Oppose</p> <p>Amend page numbers according to Eradication programme classification</p> <p>If adopted, this submission will also require changes to the current wording and location of wilding conifer sections of the Proposal. Relevant sections of the Proposal effected include:</p> <ul style="list-style-type: none"> <li>• Part and Page: Part 6, pg26-30, 6.2 Pests to be managed under eradication programme, Table 8, Table 9, and Table 10 Amend to include wilding conifer content that is currently proposed under progressive containment programme. Amend to describe collective management approach to eradication of wilding conifers between community, local and central government agencies.</li> <li>• Part and Page: Part 6, pg31, 33-34, 6.3 Pests to be managed under progressive containment programme, Table 11, Table 12 and Table 13 Related to above, removal of wilding conifers from progressive containment programme.</li> <li>• Part and Page: Part 6, pg35-36, 6.3 Pests to be managed under progressive</li> </ul>	Reject	Refer to submission point 48.1

			<p>containment programme, Table 13, Plan Objective 4 Amend Plan Objective 4 to reflect community driven collaborative and coordinate response to wilding conifers to achieve eradication.</p> <ul style="list-style-type: none"> <li>Part and Page: Part 7, pg68-69, 7.1 Measuring achievement of objectives, Table 32: Monitoring objectives</li> </ul> <p>Amend according to change in primary pest management programme.</p>		
48.4	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>This section identifies various pests that are subject to Good Neighbour Rules (GNR). These rules are intended to support properties where pest control works have been undertaken. This submission is in part opposition because of the exclusion of wilding conifers from the list of GNR.</p> <p>Rule 6.3.2 is not currently noted as a GNR but requires the neighbours of a property that have been controlled using public funds, to eradicate wildings within 200m of the property boundary. WELRA would submit that this is a GNR rule and should be identified as such, both in the reference list on pg20 and noted within Rule 6.3.2.</p> <p>While WELRA understands that wilding conifers are subject to a variety of pest control programme structures and management systems, being included in the GNR system will support control works completed to</p>	<p>Oppose</p> <p>Amend the Proposal pg20 (and any other page where this list is stated in the Proposal) by the inclusion of wilding conifers in the list of pests subject to GNR:</p> <p>Pg20 – The pests subject to GNR's include Bennett's wallaby, feral rabbit, broom, gorse, old man's beard, and nassella tussock and wilding conifers.</p> <p>Pg15 – In Table 3, insert 'Yes' into the Good Neighbour Rule</p> <p>Pg36 – addition of Note: This is designated a Good Neighbour Rule to Rule 6.3.2</p>	Accept in part	See submission point 74.1 for details of the proposed Good Neighbour rule for wilding conifers. The amendments suggested in this point are accepted, except for 'pg 36 - addition of Note'. We are seeking to include a separate Good Neighbour Rule, so that the existing rule's implementation is not limited by the criteria in the National Policy Direction for Good Neighbour Rules.

		<p>date and help contain the spread.</p> <p>Failure to categorise Rule 6.3.2 as a GNR; coupled with a land occupier's requirements under proposed Rule 6.3.1 and a proposed progressive containment programme; could inadvertently burden some land occupiers with ongoing financial costs if the neighbouring properties are not required to remove coning wildings. Ironically, the occupiers unfairly burdened with costs will be the properties who have already done the right thing and controlled the pest on their property.</p>			
48.5	<p>Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw</p>	<p>Rule 6.3.1 is intended to support control works already completed by ensuring any land occupiers maintain the controlled status of the land. If public money has been utilised, the occupier must ensure wilding conifers do not re-establish. WELRA supports in part this regulatory framework as it encourages occupiers to maintain land in a wilding free state. However, WELRA proposes that this framework should provide support to all wilding conifer control work, whether publicly or privately funded. By removing condition (b), this rule will support and maintain all wilding conifer control work throughout Canterbury and assist with halting the spread quicker.</p> <p>In addition, under a progressive containment programme, any occupier of land that has received public funded control works is liable for the ongoing costs associated with the containment of the spread. A policy of eradication will ensure these land</p>	<p>Support in part</p> <p>Delete part (b) of Rule 6.3.1</p>	Note	<p>We support the intention behind this request in terms of keeping cleared land clear. However, the council does not currently have the ability or the capacity to monitor and enforce maintenance conditions for private wilding conifer control works.</p>

		occupiers are not burdened with control costs and responsibilities in perpetuity.			
48.6	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>The purpose of Rule 6.3.2 is to support control efforts already undertaken. Where control works have been completed, any neighbour to those works can be instructed to remove wildings within 200m of the property boundary. WELRA supports in part the intent behind this rule and believe it is a 'good neighbour rule' and should be classified as such in the Proposal.</p> <p>However, particularly with the most invasive conifer species, contorta, this will be totally ineffective as seed source trees can be many kilometres up wind. The seed source of the infected area must be eradicated otherwise the downwind property will be obliged to undertake control works in perpetuity, particularly when considering the requirements proposed Rule 6.3.1.</p> <p>The proposed 200m limit will not achieve the intent of the rule, which is to protect gains made in halting the conifer spread. As conifer seeds can travel many kilometres in strong north-west winds, the proposed distance must be increased to achieve the desired intent behind the rule. To be effective, and to not unfairly burden some properties, WELRA proposes to amend Rule 6.3.2 to state 5km upwind or 200m in any other direction. This will allow the targeting of seed source sites that are impacting on neighbouring properties and will</p>	<p>Support in part</p> <p>Amend rule 6.3.2 to include the note: This is designated a Good Neighbour Rule</p> <p>Amend rule 6.3.2 to state 5km upwind or 200m in any other direction.</p>	Reject	<p>Staff have recommended including a Good Neighbour Rule to manage the risk of spread from Crown land, refer to submission point 74.1. We note that applying a 5km upwind boundary is likely to pose unreasonable costs to neighbouring occupiers, and not satisfy the requirements of a Good Neighbour Rule under the National Policy Direction for Pest Management. Staff also anticipate that it may be very difficult to prove that a conifer tree up to 5km from a site that has been controlled may impact on this operation.</p>

		enable the effective containment or eradication of wilding conifers.			
48.7	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Eradication is achievable with the right mobilisation of resources and a strong supporting legal framework. WELRA supports in part the direction of the Proposal in relation to the wilding conifer threat, but believes more can be done in the framework of the Proposal to control and eradicate the spread.</p> <p>WELRA proposes the addition of a new rule (proposed Rule 6.3.3) that allows for the targeting and removal of major seed source trees sites. A cluster of coning conifers on an exposed ridge can spread thousands of viable seeds many kilometres each season. These key locations have a significant impact on the rate of spread. Removing these key seed source sites is vital in any wilding conifer pest management programme and is key to reducing overall control costs. Under this proposed rule it is recommended that an Authorised Person can provide written direction to a land occupier to destroy any seed source conifers that are contributing to the spread.</p> <p>This will give ECan the authority to remove major seed source sites which will reduce the rate of the spread and support the objectives of a progressive containment programme. However, by having the authority to control key seed source sites, an eradication programme is also achievable in the lifetime of the pRPMP.</p>	<p>Support in part</p> <p>Insert new rule, 6.3.3 (or equivalent wording):</p> <p>Plan Rule 6.3.3</p> <p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all coning wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy where those trees contribute to the wilding conifer spread.</p>	Reject	<p>While this suggested rule may enable the achievement of an eradication objective, staff consider that it may be difficult to administer from a 'fair and reasonable' perspective. The application of this rule could be somewhat subjective and would not provide the community with certainty of whether wilding conifers and the named species would require to be removed. The addition of this rule, in this late stage of the process would also not enable the community to have a say on this matter.</p> <p>Staff propose to work collaboratively with occupiers outside of the RPMP to address wilding conifers and the named pest species on exposed sites and that are potential seed sources for greater areas.</p>

48.8	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Wilding Conifers:</p> <p>The pest species list includes conifer species that have no commercial value. However, although a species with commercial value, Douglas fir also is a vigorous wilding-spread species responsible for many hectares of wilding invasion.</p>	Amend wilding conifer provisions to include Douglas fir in the list of pest species when the seed escapes beyond the planted area and establishes seedlings in neighbouring property(s).	Note	Staff would benefit from further evidence and discussion at the hearing on the matter of controlling Douglas fir seed [council definition is as a <i>pest agent</i> ], especially in light of the recently notified National Environmental Standard for Plantation Forestry. The current position of staff is that there would need to be specific conditions for a pest agent rule for wilding conifers.
48.9	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Plan Rule 6.3.2</p> <p>There is a statement – “..... present on land they occupy within 200m of an adjoining property boundary prior to cone bearing if control operations to clear wildings .....”</p> <p>The “200m” distance from a neighbouring boundary, under the GNR requirements, is far too short for the most vigorous of the spreading species - lodgepole pine. In Canterbury, lodgepole pine seeds have spread up to 10km from their seeding parent trees as has happened at Craigieburn/Flock Hill Station.</p>	Amend rule 6.3.2 to expand the neighbouring boundary distance for wilding conifers from “200m” to “5 km”.	Reject	Staff consider that, while seed spread may occur over significant distances, applying a 5 kilometre buffer would be an unreasonable cost to neighbours.
51.1	Simpson, Douglas	<p>Whilst along with all Mt Lyford Village owners we are concerned about the spread of wilding conifers we are handling this problem ourselves.</p> <p>The covenants for Mt Lyford village have both Larch and Douglas Fir on the planting list. There are also commercial forests adjacent to the village.</p> <p>Our residents have set up our own society to tackle this problem. We do</p>	<p>Oppose</p> <p>Amend provisions to not involve ECan in wilding conifer control for Mt Lyford Village or require removal of our specimen conifers and adjacent forests.</p>	Reject	<p>Submission point 38.5 raises a similar point regarding village conifer plantings, staff would benefit from further evidence and discussion at the hearing. However, initial consideration is that this may best be handled under the Exemption process (refer section 8.3 of the PRMP), this enables the council to exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate.</p> <p>Staff also note that the inclusion of Larch in the specific list of pest conifers will prevent new</p>

		not wish Ecan to be involved as their track record on broom and gorse in our area is dismal. We have in the past controlled our own weeds and would be concerned that Ecan will force us to remove some of our specimen conifers and adjacent forests.			plantings of this species in Mt Lyford Village.
52.1	Ledgard, Nick	Support general dealing with wilding conifers as progressive containment pests.	Support No specific decision requested	Accept	
52.2	Ledgard, Nick	Corsican pine is a useful shelter species, the attributes of which (eg., low maintenance) is not replicated in other species. It is present in many improved pasture situations where its spread risk is low (eg., Glenthorne, Castle Hill and Grasmere).	Amend wilding conifer provisions to all for the retention of Corsican pine (and even planting) in low spread-risk situations	Note	Applicants can be exempted from rules under certain circumstances, one of which is to ensure that the objectives of the RPMP will still be met, this is detailed in section 8.3 of the RPMP.
52.3	Ledgard, Nick	Douglas-fir. A high spread-risk species. I fully appreciate the problems with treating D-fir as a pest, particularly when in commercial plantations. But there are many farm situations where its removal / replacement is viable, and where notification of such to land occupiers is warranted.	Amend wilding conifer provisions to further consider of how to deal with D-fir in farm situations, where removal and replacement with less spread-prone species is viable.	Reject	Staff acknowledge this point. However, staff do not consider that a rule is required to address Douglas fir in farm situations, where there are alternative options.  Refer to submission point 82.9, staff recommend inserting the following statement in section 6.3 of the PRPMP  <u>Environment Canterbury will also seek to engage with land occupiers to raise awareness about the wilding conifer spread risk from some conifer species used in shelterbelts and other smaller plantings, and in high spread risk areas and areas subject to wilding conifer control, and support and encourage the removal of small, spread-prone conifer plantings.</u>

	Network - Jamie McFadden	Wilding pines: are a significant threat to landscapes & biodiversity particularly in the high country. We support increased effort on the eradication of wilding pines. There needs to be a greater emphasis on a regional & national strategic approach to the wilding issue. The transfer of land to the conservation estate through tenure review, the fencing of native bush, shrublands and waterways by landowners and the decrease in livestock grazing pressure are all aiding the spread of wilding trees.	Support No specific decision requested	Accept	
67.3	Selwyn District Council - Lisa Arnott	Selwyn District Council supports wilding Pines being identified and listed as a pest species, and the proposed methods of controlling these species. Residents within Selwyn District have expressed concern about the adverse effects that Wilding Pines have on the environment, particularly Contorta and Larch.	Support No specific decision requested	Accept	
67.4	Selwyn District Council - Lisa Arnott	Selwyn District Council supports the forestry pines Douglas fir and Radiata pine being excluded from the list of pest conifers. The proposed Plan is not considered to restrict the ability for forestry activities to continue to operate within Selwyn District, but is consistent with the need to protect these activities against wilding pines.	Support No specific decision requested	Accept	
67.7	Selwyn District Council - Lisa Arnott	Selwyn District Council recommends the following amendments be made to the Plan: Within Alpine urban development reserve areas with approved Reserve Management Plans	Amend the RPMP to exempt Alpine urban development reserve areas with approved Reserve Management Plans that include a tree maintenance and management	Reject	Staff note that there may be inconsistencies with Reserve Management Plans across territorial authorities. Staff would benefit from further evidence and discussion at the hearing. However, initial consideration is that this may best be handled under

		that include a tree maintenance and management programme, wilding conifers shall be exempt from the Pest Management Plan provisions.	programme from wilding conifer RPMP provisions.		the Exemption process (refer section 8.3 of the PRMP), this enables the council to exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate.
67.8	Selwyn District Council - Lisa Arnott	Selwyn District Council recommends the following amendments be made to the Plan: Trees protected under the SDC District Plan shall be excluded from enforcement under the Pest Management Plan.	Amend the RPMP to exclude trees protected under the SDC District Plan	Reject	Staff consider that it may be more appropriate for this to be handled under the Exemption process (refer section 8.3 of the PRMP), this enables the council to exempt a person from a requirement in a rule in specified circumstances, on conditions that the council considers appropriate.
69.1	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	<p>The Mackenzie Basin Wilding Tree Trust supports Objective 4 in the proposed Canterbury Pest Management Plan. However, there is a concern that the wording of Rule 6.3.1 may have the effect of causing landowners to opt out of public funding because of the potential impact of the ongoing obligations it entails, thereby hindering the implementation of the eradication plan. In particular:</p> <ol style="list-style-type: none"> <li>1. As rule 6.3.1 is currently worded, “occupiers” of land may be forced to remove all wilding conifers present on property they occupy, prior to cone bearing, even if the public funding was only received to remove or destroy wildings on a small area (“in part”) of their property. In the Trust’s view, the wording should be changed to clarify that the areas that are required to be kept clear of cone bearing wildings under this rule are those areas to which public funding has been</li> </ol>	<p>Amend rule 6.3.1 as below:</p> <p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers present on the areas of the land they occupy where publicly funded clearing has occurred prior to cone bearing, if –</p> <p>(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines, and larch are located on land where control operations to clear wilding conifers have been undertaken; and</p>	Accept in part	Staff agree with the intention of this submission point, and recommend to amend based on the wording suggested in submission point 77.5. Please refer to this point for details.

		<p>allocated, rather than, as could be implied by the current wording, the whole property.</p> <p>2. On properties where wilding spread is very dense and the trees have reached maturity, once initial clearing has been undertaken, experience has shown that there will normally be a heavy regeneration of wildings from previously scattered seed. This initial regeneration may also be quite dense and wide spread, and be beyond the financial capacity of an 'occupier' to undertake a second or even third clearing if the occupier is unable to manage that land to minimise this re-infestation. To address the concern of a disconnect and often contradiction between District and Regional Councils, Doc, Ecan and LINZ there needs to be consistency in rules regarding intensification of such vulnerable land.</p>			
69.2	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	See submission point 69.1	<p>Amend rule 6.3.1 as below:</p> <p>(b) The control operations were publicly funded (either in full or in part).</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act, unless the occupiers are unable to manage such land so as to minimise its re-infestation by wilding conifers.</p>	Reject	Unfortunately this addition may risk non-achievement of the objective for progressively reducing wilding conifers and staff do not consider that this would be appropriate. The ability to maintain the initial control programme should be assessed before the control operation is confirmed. We understand that there may need to be a phased withdrawal, which will need to be managed between funding partners.
69.4	The Mackenzie Basin Wilding Tree Trust - Andrew	The Mackenzie Basin Wilding Tree Trust is of the opinion that unless	No specific decision requested	Accept	Staff acknowledge this point.

	Simpson	<p>funding from government is increased considerably in future budget allocations then the following statement in the “Alternatives considered” would be true.</p> <p>“Eradication over the 20-year time period of the Plan is not technically possible.”</p>			
69.5	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	The Mackenzie Basin Wilding Tree Trust supports Rule 6.3.2 and the explanation of it.	<p>Support</p> <p>No specific decision requested</p>	Accept	
69.6	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	The Mackenzie Basin Wilding Tree Trust supports the submission made by WELRA (the Waimakariri Ecological & Landscape Restoration Alliance Inc), except for their submission on Plan Rule 6.3.2 in which they submit that “The neighbouring boundary distance for wilding conifers be expanded from 200m to 5km”. We support the existing 200m distance that is already part of this rule.	No specific decision requested	Note	
74.1	Federated Farmers - Lynda Murchison	Federated Farmers strongly supports the proposed Good Neighbour Rules which will bind the Crown (namely Department of Conservation (DOC) and Land Information New Zealand (LINZ)) to the requirements of the proposed RPMP for wallabies, broom, rabbits, gorse, nasella tussock and old man’s beard. Many farmers within the region have a boundary with Crown land and because of the nature of Crown land use and management suffer the impact of pest spread across the boundary. Federated	<p>Support in part</p> <p>Insert a new rule for wilding conifers to the Good Neighbour Rule category for the boundary control rule listed above.</p>	Accept	<p>We accept this request and recommend that the following is inserted. For consistency, this includes the wording amendment requested in submission point 77.5</p> <p><u>Plan Rule 6.3.3</u></p> <p><u>Note: this is designated a Good Neighbour Rule</u></p> <p><u>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch</u></p>

Farmers has long questioned the exclusion of the Crown from regional pest management responsibilities as pest species do not recognise legal boundaries. For this reason, Federated Farmers applauds the efforts of Regional Councils to bind the Crown to the collective management of these pest species.

In addition to the proposed species, Federated Farmers strongly recommends that the various wilding conifer species are added to the Good Neighbour Rule list in regards to the following boundary clearance rule; 'Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers have been undertaken on the adjoining property, within 200m of the boundary, since the commencement of the Plan.'

Given the National Wilding Conifer Management Strategy, to which Federated Farmers, DOC, LINZ and Environment Canterbury are all stakeholders, it seems illogical to not include a Good Neighbour Rule for the management of these prolific pest species.

present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, where they have previously been cleared through control operations and that occupier is taking reasonable steps to manage wilding conifers on their land, within 200m of the boundary, since the commencement of the Plan.

A breach of this rule creates an offence under section 154N(19) of the Act.

Explanation of the rule

The reason for this rule is to provide protection for control operations that clear wilding conifers.

77.1	Land Information New Zealand (LINZ) - Maurice	LINZ supports the list of organisms classified as 'pests' in Section 4.1.	Support in part	Note	Staff would benefit from further evidence and discussion at the hearing on the matter of controlling
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	Dale	<p>LINZ however notes that some wilding conifer species such as pinus radiata and Douglas Fir are commercial species, and therefore technically not a 'pest', but rather 'pest agents'. Consequently, LINZ considers it should be made clearer in Section 4.1 those species which are 'pest agents' which are subject to control in the Plan.</p> <p>LINZ also considers that Russell lupin should be added as a 'pest agent' in section 4.1, table 3. The reasons for inclusion of Russell lupin and associated controls in the Plan, is addressed elsewhere in this submission.</p>	Retain the organisms declared as 'pests' in section 4.1, however make it clearer as to those commercial species which are 'pest agents', including pinus radiata and Douglas fir.		Douglas fir and Pinus radiata as a pest agents, especially in light of the recently notified National Environmental Standard for Plantation Forestry. The current position of staff is that there would need to be specific conditions for a pest agent rule for wilding conifers.
77.3	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports the definition of 'wilding conifer' on page 15 of the Plan, and the related list of introduced conifer trees set out in Table 4. LINZ in particular supports naturally occurring Pinus radiata and Douglas fir being included in table 4 and the definition of 'wilding conifer'. Douglas fir is a particularly invasive species. Their inclusion will ensure they are managed under objective 4 and rules 6.3.1 and 6.3.2, where they are outside of forestry plantations.</p> <p>LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, water yield and production values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to progressively contain and reduce</p>	<p>Support</p> <p>Retain the definition of 'wilding conifer', and the list of introduced conifer trees in table 4.</p>	Accept	

		wilding conifers in Canterbury, in support of the National Wilding Conifer Management Strategy 2015 – 2030.			
77.4	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports objective 4 and related rules 6.3.1 and 6.3.2 seeking the progressive containment and reduction in the geographic distribution or extent of wilding conifers.</p> <p>LINZ however considers that rules 6.3.1 and 6.3.2 as currently worded are unclear and uncertain. LINZ considers that the trigger for when wilding conifers are to be destroyed should instead refer to where 'they have previously been cleared through control operations', rather than where control operations have been undertaken so as to align with the intent of objective 4.</p>	<p>Support in part</p> <p>Retain objective 4</p>	Accept	
77.5	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.4	<p>Amend rule 6.3.1(a) as follows:</p> <p>(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines and larch are located on land where control operations to clear wilding conifers have been undertaken they have previously been cleared through control operations; and</p>	Accept	<p>Staff support this amendment as proposed, it adds greater clarity and a clear link to the objective. Amended wording recommended below,</p> <p>(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines and larch are located on land where <del>control operations to clear wilding conifers have been undertaken</del> <u>they have previously been cleared through control operations;</u> and</p>
77.6	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.4	<p>Support in part</p> <p>Amend rule 6.3.2 as follows:</p> <p>Within the Wilding Conifer Containment Area shown on Map 1</p>	Accept	<p>Staff support this amendment as proposed, it adds greater clarity and a clear link to the objective.</p> <p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person,</p>

			in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers have been undertaken they have previously been cleared through control operations on the adjoining property, within 200m of the boundary, since the commencement of the Plan.		destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if <del>control operations to clear wilding conifers have been undertaken</del> <u>they have previously been cleared through control operations</u> on the adjoining property, within 200m of the boundary, since the commencement of the Plan.
78.9	Department of Conservation - David Newey	See submission point 78.10	Support in part  Amend provisions in the RPMP to include Banks Peninsula in the Progressive containment programme	Reject	Currently Banks Peninsula is not part of the proactive National Wilding Conifer Programme and, therefore, we are not seeking to include this area. Current organisational capacity is limited to monitoring an enforcing targeted areas for wilding conifer compliance.
78.11	Department of Conservation - David Newey	There may also be instances where coning wilding conifers need removal.	Support in part  Amend provision 6.3.1 to include coning wilding conifers within the rule or have an additional rule for coning wilding conifers.	Reject	The intention of rule 6.3.1 is to keep land that has been cleared of wilding conifers clear, and subsequent maintenance needs to occur prior to coning. There should not be any instances of coning wilding conifers present in the area after the initial control operation has been completed.
78.12	Department of Conservation - David Newey	There are other areas where wilding conifer work is also undertaken and a good neighbour rule should also apply outside the wilding conifer containment area	Support in part  Amend rule 6.3.2 to include areas outside the wilding conifer management area, or, add a rule for areas outside the wilding conifer containment area.	Reject	Staff acknowledge the intent in this request, but unfortunately the council does not currently have the capacity to monitor and enforce rule 6.3.2 outside of the Wilding Conifer Zone.
78.37	Department of				

	Conservation - David Newey	Wilding conifers. Beneficiaries and exacerbators are not fully identified for wilding conifers in table 35. In the supporting analysis of costs and benefits, hydro benefits and benefits for irrigated land amount to 50% collectively. Active exacerbators are those who plant wilding conifers for woodlots, carbon forests, shelter, and amenity plantings. These include the planting wilding conifer species and those species considered as “pest agent” species such as Douglas fir. These types of planting are seed sources for distant spread in high winds. The result is substantial ongoing expenditure is required to carry out surveillance and control of scattered wilding conifers over large areas to prevent wilding conifer spread. This is a significant cost for Crown agencies and neighboring lands.	Support in part  Amend table to better identify active exacerbators, and identify water users as the main beneficiary of this work.	Accept	Staff recommend to insert 'water users' as wilding conifer beneficiaries in Table 35.
82.5	Ministry for Primary Industries - Sherman Smith	MPI strongly supports Environment Canterbury’s ongoing commitment to the management of wilding conifers within the Canterbury region, and welcomes the expansion of its wilding conifer pest management programme to include a regulatory framework, which will support the collaborative operational control work that has been, and continues to be, central to the regional programme. This will also support key central and local government initiatives contributing to the implementation of the National Wilding Conifer Management Strategy 2015-2030, particularly the National Wilding Conifer Control Programme.  MPI also supports Environment	Support  No specific decision requested	Accept	

		Canterbury's commitment to improving consistency in the regulatory components of regional councils' wilding conifer programmes, by utilising and adopting key parts of MPI's 2016 guidance document for wilding conifer pest management programmes within Regional Pest Management Plans.			
82.6	Ministry for Primary Industries - Sherman Smith	MPI supports the specification of wilding conifers as pests and the definition used for wilding conifers, which is consistent with that set out in MPI's guidance on wilding conifers in Pest Management Plans (the MPI wilding conifer guidance).	Support  Retain the specification of wilding conifers as pests and the definition used for wilding conifers	Accept	
82.7	Ministry for Primary Industries - Sherman Smith	MPI supports the specification of Contorta (lodgepole) pine, European larch (excluding sterile hybrids), Mountain pine, Dwarf mountain pine, and Scots pine as pests, which is consistent with the recommended approach set out in the MPI wilding conifer guidance on this matter. This is a positive step in the prevention of additional potential future wilding conifer spread, as it prevents new plantings of these particularly spread-prone conifer species.	Support  Retain the specification of named conifer species	Accept	
82.8	Ministry for Primary Industries - Sherman Smith	MPI supports the specific reference to, and stated support for, the New Zealand Wilding Conifer Management Strategy 2015-2030. An integrated approach to wilding conifers will be important to the achievement of that Strategy's aims and objectives.	Support  Retain the specific reference to and stated support for the New Zealand Wilding Conifer Management Strategy 2015-2030.	Accept	

82.9	Ministry for Primary Industries - Sherman Smith	<p>MPI notes and supports the specific acknowledgement of the issue of wilding conifer spread from conifer plantations and the need for ongoing engagement with stakeholders to find ways to manage this. This is an important and positive acknowledgement of this difficult issue.</p> <p>However, in recognition that the issue of wilding conifer spread from planted spread-prone conifer species in vulnerable parts of the region also relates to smaller plantings, such as shelterbelts and amenity plantings, MPI recommends an additional statement addressing this.</p> <p>In addition, MPI encourages Environment Canterbury to explore and consider potential different options (both regulatory and non-regulatory) for managing the risk of wilding conifer spread from future new plantings of spread-prone conifer species, particularly in parts of the region vulnerable to wilding conifer invasion.</p>	<p>Support in part</p> <p>Insert the following, or a similar statement, on page 31, immediately before Table 12:</p> <p>Environment Canterbury will also seek to engage with land occupiers to raise awareness about the wilding conifer spread risk from some conifer species used in shelterbelts and other smaller plantings, and in high spread risk areas and areas subject to wilding conifer control, support and encourage the removal of small, spread-prone conifer plantings.</p> <p>Consideration of options for managing wilding conifer spread risk from future new conifer plantings (large and small).</p>	Accept in part	<p>Staff accept the suggestion to add a statement encouraging the removal of small, spread-prone conifer plantings, as below:</p> <p><u>Environment Canterbury will also seek to engage with land occupiers to raise awareness about the wilding conifer spread risk from some conifer species used in shelterbelts and other smaller plantings, and in high spread risk areas and areas subject to wilding conifer control, and support and encourage the removal of small, spread-prone conifer plantings.</u></p> <p>Staff consider that the second part of the requests relating to future new conifer plantings is already captured in the following comment on page 31: Environment Canterbury will seek to engage with key stakeholder groups to further develop a management framework for plantation forests that contributes to the control of the spread of wilding conifers.</p>
82.10	Ministry for Primary Industries - Sherman Smith	<p>MPI supports the description of pest and adverse effects outlined for wilding conifers and for the specific conifer species, as these are consistent with the MPI wilding conifer guidance.</p>	<p>Support</p> <p>Retain the description of pest and adverse effects outlined for wilding conifers and for the specific conifer species</p>	Accept	
82.11	Ministry for Primary Industries - Sherman Smith	<p>MPI supports the more specific, time-bound and measurable second part of Plan Objective 4, but suggests that the first part of the objective would</p>	<p>Support in part</p> <p>Amend objective 4 to ensure more clarity and/or specificity, particularly</p>	Accept in part	<p>Staff acknowledge this request. However, we do not have sufficient information regarding the percentage of area covered of the percentage of density at this point in time. The progressive containment</p>

		<p>benefit from greater clarity and/or specificity in terms of where containment and/or reduction will occur, and/or to what extent this will occur.</p> <p>The Maps in Part 2 of the proposed RPMP show a Wilding Conifer Containment Area, but it is not clear whether Plan Objective 4 relates only to this Containment Area, or to the region as a whole. MPI suggests that, if the objective includes containment, it is important to specify the area or areas within the region to which the pest is intended to be contained.</p> <p>MPI suggests that section 8 of the MPI wilding conifer guidance, which sets out standardised programme objective statements, may be helpful in reviewing proposed Plan Objective 4.</p>	<p>in terms of where containment will occur, and/or to what extent reduction will occur.</p>		<p>objective applies to the area specified in map 1, in appendix 3. Staff recommend to amend objective 4 as below:</p> <p><del>Within the Canterbury region</del> <u>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3</u>, 900,00 hectares of land will be cleared of wilding conifers within 10 years of the commencement of the Plan.</p> <p>Staff also note that there may have been some confusion regarding map 1, which, in error, does not align with the area under management as part of the National Wilding Conifer Control programme. Staff recommend that a new map is supplied, which reflects this. See Attachment 3.</p>
82.12	Ministry for Primary Industries - Sherman Smith	<p>Clause 4(1)(a) of the NPD requires that the objectives in a Plan must state the adverse effect(s) of the pest that the Plan aims to address. MPI supports the reference in Plan Objective 4 to addressing adverse effects on economic well-being and the environment. However, because under a progressive containment objective there will still be some infestations or occurrences of the pest, it may be unrealistic to expect a progressive containment outcome to prevent adverse effects. Therefore, MPI suggests that a more appropriate term might be to “reduce”, or “limit”, or “minimise” adverse effects.</p>	<p>Support in part</p> <p>Amend objective 4 to consider replacing the word “prevent” with “reduce” or “limit” or “minimise”, or similar wording.</p>	Accept	<p>Staff acknowledge this point and recommend the following amendment:</p> <p>Over the duration of the Plan, progressively contain and reduce the geographic distribution or extent of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch within the Canterbury region to <del>prevent</del> <u>reduce</u> adverse effects on economic well-being and the environment.</p>
82.13	Ministry for Primary				

	Industries - Sherman Smith	MPI supports the recognition of the contribution of the National Wilding Conifer Control Programme will make to achieving Plan Objective 4.	Support  Retain the recognition of the contribution of the National Wilding Conifer Control Programme	Accept	
82.14	Ministry for Primary Industries - Sherman Smith	<p>MPI strongly supports the inclusion of Plan Rule 6.3.1, as it provides for ongoing 'maintenance' control of wilding conifers (keeping cleared areas clear) following publicly funded control operations, thereby securing long term gains and a level of 'protection' of the public investment that has been made. However, MPI suggests that Plan Rule 6.3.1 may benefit from some amendments and/or clarification.</p> <p>Firstly, it is not clear whether the intended occupier obligation is just to remove all wilding conifers, or is to remove all wilding conifers and any planted conifers of the specified species. The intent here should be clarified by reviewing where in the rule reference is made to the specified conifer species. MPI suggests that consideration of the wording of Rule 3B in the MPI wilding conifer guidance may assist in this regard.</p> <p>Secondly, the reason for including the words "...on receipt of a written direction from an Authorised Person..." is unclear. In some instances, these words have been used within a rule to indicate that the rule is essentially a 'complaints based' rule, i.e. enforcement will generally be limited to instances where a complaint is received. MPI is concerned that if this is the intention in this case, this</p>	<p>Support in part</p> <p>Amend the wording of rule 6.3.1, in order to clarify whether the obligation is to remove all wilding conifers, or, all wilding conifers and all planted conifers of the specified species.</p>	Reject	This rule is intended to support the initial work undertaken by previous control operations. The previous control operation would include removing all wilding and planted conifers of the named species. Therefore, the only new growth would be wilding conifers.

		does not provide adequate long-term 'protection' in terms of keeping cleared areas clear. In the context of the situations in which this rule would apply, the obligation to destroy wilding conifers should apply regardless of the receipt of any complaint.			
82.15	Ministry for Primary Industries - Sherman Smith	See submission point 82.14	Clarify if the intention behind including the words "...on receipt of a written direction from an Authorised Person..." in rule 6.3.1 is to infer enforcement on a 'complaints only' basis, remove these words from rule 6.3.1. If this is not the intention, then outline the reason(s) for inclusion of these words in the accompanying Explanation of the Rule.	Accept	This inclusion is not required in the rule, and staff propose to remove this. Amended wording to the rule below:  Plan Rule 6.3.1  Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, <del>on receipt of a written direction from an Authorised Person,</del> destroy all wilding conifers present on land they occupy prior to cone bearing, if -
82.16	Ministry for Primary Industries - Sherman Smith	MPI supports the inclusion of Plan Rule 6.3.2, which aims to reduce the 'externality' impacts of wilding conifer spread from adjoining properties, where an occupier is actively controlling wilding conifers. MPI suggests that there may be value in amending the wording of Plan Rule 6.3.2 to include reference to an occupier taking 'reasonable measures' to control wilding conifers, either instead of, or in addition to, reference to 'control operations to clear wilding conifers'. This may better cover situations where an occupier proactively and pre-emptively undertakes regular inspections, looking for and removing, wilding conifer seedlings, which may not be considered to be 'control operations to clear', but would likely fall within 'reasonable measures'. Reference to	Support in part  Amend rule 6.3.2 to read as follows: "Within the...prior to cone-bearing, if control operations to clear wilding conifers, or other reasonable measures to control wilding conifers, have been undertaken..."  Include the type of things that constitute 'reasonable measures to control wilding conifers' in the Explanation of the Rule.	Reject	The suggested wording does not provide enough specificity to give certainty for Biosecurity Officers to ascertain what would be considered reasonable. It would not provide transparency to occupiers as to what measures would trigger this rule.

		the type of things that constitute 'reasonable measures' could be included in the Explanation of the Rule, as per the NPD Guidance Material, Part 2 (especially clause 205 and 206).			
82.17	Ministry for Primary Industries - Sherman Smith	<p>Keeping clear areas clear is an important principle in achieving a progressive containment objective. Areas may be 'clear' of a pest for a number of reasons, such as due to specific control actions, particular land use activities, or the pest having not yet infested the area. Proposed rules 6.3.1 and 6.3.2 appear to aim to ensure that areas where wilding conifer control actions are undertaken will subsequently remain clear, and it appears that the parts of the region excluded from the proposed Wilding Conifer Containment Area are predominantly areas where the intensity and nature of land use will effectively prevent or minimise wilding conifer establishment. However, there are likely to be areas within the proposed Wilding Conifer Containment Area that are vulnerable to wilding conifer infestation, but which are currently clear of wilding conifers (or have only a very light, scattered presence). Given that the cost of wilding conifer control compounds significantly the longer any infestation is left uncontrolled, MPI is concerned that the proposed RPMP does not specifically address these clear but vulnerable areas. In such areas, a requirement that occupiers remove the pest prior to reproduction, can be an important</p>	<p>Support in part</p> <p>Add in a rule or rules requiring occupiers to remove wilding conifers within areas that are currently clear of wilding conifers, but are vulnerable to wilding conifer invasion. MPI suggests that Rules 1, 2 or 3A in the MPI wilding conifer guidance could potentially be used for this purpose.</p>	Reject	<p>Staff acknowledge the intent in this request, but unfortunately the council does not currently have the capacity to monitor and enforce a 'keep clear areas clear' type objective for wilding conifers.</p>

		<p>'regulatory back up' to other education and advocacy type principal measures aimed at preventing new areas of wilding conifer infestation and halting the cycle of new 'legacy' areas of wilding conifers being created. The potential for such a requirement to impose an inequitable burden on occupiers due to an uneven spread of invasions is minimal if it is applied in areas where there is a high confidence that the pest is either not present, or present in only very light numbers. It is also possible to provide for an 'alternative to compliance' type agreement within a rule, which allows an alternative, negotiated approach to wilding conifer control, in the case of uncertainty about the level of infestation in parts of the area to which the rule applies.</p>			
82.18	Ministry for Primary Industries - Sherman Smith	<p>MPI suggests that Plan users may benefit from some expansion of the reasons for Plan Rules 6.3.1 and 6.3.2, as set out in the Explanation of rules column of Table 13, particularly in relation to Plan Rule 6.3.2. Section 9 of the MPI wilding conifer guidance, which sets out standardised statements of intent for rules, may be helpful in this regard.</p>	<p>Support in part</p> <p>Amend the explanations to rules 6.3.1 and 6.3.2 to expand on the standardisation statements of intents for rules.</p>	Accept	<p>Staff acknowledge the request to use standard ways of describing wilding conifer provisions.</p> <p>Staff recommend the following amendment to the Explanation of the rule for rule 6.3.1</p> <p><del>The reason for this rule is to ensure that investing public funds in collaborative pest control programmes at specified sites will be secured by enforceable future maintenance. <u>Over the duration of the Plan, to ensure that new infestations of wilding conifers are prevented at sites where publicly funded operations to remove wilding conifers and/or Contorta pine, Scots pine, Dwarf mountain pine, Mountain pine or European larch and/or any other planted conifer species have occurred.</u></del></p> <p>Staff recommend the following amendment to the Explanation of the rule for rule 6.3.2</p>

					<u>The reason for this rule is to provide protection for control operations that clear wilding conifers. Over the duration of the Plan, to ensure that the spread of wilding conifers does not cause unreasonable costs to adjacent or nearby properties, that have undertaken control operations to clear wilding conifers.</u>
88.8	Forest and Bird - Jen Miller	<p>Wilding seed source from private land. 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 Pinus radiata 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</p>	<p>Oppose</p> <p>Amend rule 6.3.2 to reconsider the species and their spread. As currently worded the rule is not fit for purpose and in Forest &amp; Bird's view will not adequately control the significant biodiversity</p>	Reject	<p>Staff agree that it is by far more preferable to prevent wilding spread from occurring. There are significant economic reasons for not including Douglas fir and Pinus radiata in the list of specified pest conifers, primarily because this would be overly prohibitive to the forestry industry. In terms of distance of spread, it is acknowledged that seed can spread significant distances (much greater than 200m, when seeding and high winds coincide), but the 200 metre buffer is deemed by staff to capture the majority of the wind dispersed seed spread.</p>

		<p>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> <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>			
88.11	Forest and Bird - Jen Miller	<p>It is not clear why Pinus radiata and Douglas fir have been excluded from the wilding trees listed in the Table. As described [in submission point 88.8] both species present a considerable wilding problem.</p>	<p>Support in part</p> <p>Amend table 11 to add Pinus radiata and Douglas fir - Psudotsuga meniesii</p>	Reject	See submission point 88.8
91.1	Springford, Owen	<p>I challenge the provision of references to wilding conifers in the pest plan.</p> <p>In summary my view that Ecan has grotesquely over stated the negatives of wilding conifers and has not even mentioned the many positives.</p> <p>Low stature native plants are early stages in the process of ecological succession. There is no difference between the effect of dense wilding conifers and dense wilding Manuka/kanuka or Mountain beech forest on these low stature native plants. All of these forest types do not</p>	<p>Remove references to wilding conifers in the RPMP</p>	Reject	<p>Wilding conifers can have benefits in carbon sequestration and soil conservation. There may be some circumstances where they provide an ecological benefit but overall they have a negative impact on New Zealand's unique biodiversity, as described in the Proposal.</p> <p>Regardless of these benefits, the key issue is that the species included in the PRPMP readily spread beyond the property boundaries and impose significant costs on others through loss of production, unwanted ecological impacts and control costs. Even within a property the spread of wilding pines can impact the wider public interest: the impact on water flow is an example.</p>

lead to extinction but to replacement by the next set of flora and fauna in the process that leads to climax native forest. The drying of wet lands and riparian areas is just the process of restoring the status quo antes.

Wilding conifers will not replace healthy native ecosystems but will help restore those native forest ecosystems damaged by farming operations.

Wildings species are particularly good at restoring soil carbon (organic matter) and mining nutrients from deep in the soil horizon, thereby increasing soil fertility and provide opportunities for native flora and fauna to thrive.

The reality is that native forest species enjoy growing amongst exotic trees to such an extent that they can result in significant losses of exotic forest between planting and harvesting.

There are truly magnificent Douglas-fir forests with full native understorey in Whakarewarewa forest that are enjoyed by tens of thousands of mountain bikers and walkers. Douglas-fir is our most valuable exotic species in terms of price per m<sup>3</sup>.

Wilding forests are very popular by campervan tourist for camping spots as they provide wind protection, privacy and can cope with human waste effectively. Mountain bikers particularly like exotic forests for riding in. The shores of Lake Pukaki were much better for being forested.

Wilding exotics grow where there

The inclusion of these pests in the RPMP and the associated rules, are part of a national control programme. It is required to protect the considerable investment being made by Crown, the Council and landowners. Land owners wanting to encourage reforestation or climax forests have many other species available to them which do not have the adverse effects of the species included in this proposal.

once were native forests. So they only are restoring the water flows to what they were. Furthermore, as with native forests, they improve all the water quality measures such as clarity and cleanness. They attenuate both water flow and water temperature fluctuations-important for instream biodiversity. Science indicates that there needs to be a buffer of at least 20 metres between intensive farming and water bodies in order to prevent sediment and nutrients entering those water bodies. Wildings can serve this function effectively and cheaply, while they serve as a nurse for native forest.

Wildings forests are no more flammable than kanuka or mountain beech.

Pine forests are the best source of mahinga kai in the form of huhus.

Wildings will not grow in healthy pasture. The main reason wildings do grow is because the land and soil has been so badly degraded by farming malpractice over the last one and half centuries.

If NZ is to meet its 2015 Paris emissions reduction targets it needs to plant around one million ha of new forest. In commercial forestry this would cost around \$1.5 billion (excluding land cost). Wildings will achieve the same goal free.

We have put measurements in wilding stands that show that they can sequester carbon dioxide at the rate of 50-70 NZUs/ha per year. At \$20/NZU this means that these forest could

		produce around \$1000/ha/year. DoC could produce enough revenue from wildings to completely control the mammalian pests sending much of our native fauna to extinction.			
92.3	McDonald, Fiona	Ten years is a significant timeframe that allows for specific replanting with appropriate native species.	Support Retain provision 6.3	Accept	
92.4	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed.	Support Retain table 12	Accept	
92.5	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed and to protect the publicly funded control operations.	Support Retain rule 6.3.1	Accept	
92.6	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed and to protect the publicly funded control operations.	Support Retain rule 6.3.2	Accept	
92.7	McDonald, Fiona	If Castle Hill village was excluded from the requirements of the Plan the villagers and Selwyn District Council would become exacerbators as they would be wittingly allowing wilding spread.	Support Retain RPMP provisions to ensure that all alpine developments within the Wilding Conifer Zone are included in the Plan.	Accept in part	While we are not recommending any amendments regarding Council reserves in communities, the Exemptions process is open for applicants, applications are considered on the basis that objectives in the RPMP are met. For more details regarding the Exemption process, refer to section 8.3 of the PRPMP.

<b>Bennett's wallaby</b>					
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Staff Recommendation</b>	<b>Reasons</b>
6.8	Ross, Fraser Bell	Bennett's Wallaby: probably the most serious pest we have which affects bush, native forests and other indigenous vegetation. And wallabies have spread widely in recent years and their numbers have build up markedly with impacts for the natural environment. So while the proposed rules, for wallabies, are supported, more needs to be done to control and reduce their numbers in all areas, including within natural stands of native bush and native forests. Sustained control would be supported.	Support in part  Amend provisions to provide for the sustained control of Bennett's wallaby in all areas.	Note	Sustained control is the objective for the Canterbury region, greater work is needed to address pressure on the boundaries of the Containment Area (i.e. a Progressive Containment approach). Further control work beyond the boundary to reduce wallaby numbers will be undertaken outside the RPMP, and without the need for specific rules.
17.1	QEII National Trust - Rob Smith	Wallabies have caused and continue to cause significant browsing damage in QEII National Trust covenants that are found along the Hunter Hill eastern slopes. We have seen the current legislative and management approach undertaken by all the responsible local and regional authorities as well as local landowners often not being that effective. The reasons for this lack of impact on the wallaby population is that wallabies need to be in high numbers before control methods are used, by this time, even if we manage to get a coordinated approach from all the landowners (not an easy task) much of the damage has been done and the lower levels of the bush are effectively stripped bare.	Amend wallaby provisions to enable the regional council to lead and have the authority to coordinate wallaby control	Reject	We accept that a number of submissions have requested investigation of, or the establishment of a wallaby control unit/board. Greater information is required to ensure that the benefits of doing this would out weigh the costs. This exercise will be undertaken outside of the RPMP process, as part of the wider council biosecurity programme. The council currently facilitates joint occupier wallaby control operations.

18.13	Frank, Hermann	The measures for Bennett's wallaby are strongly supported. However, I oppose the condition under Plan rule 6.4.2 'where the occupier of adjacent land is taken reasonable steps to manage wallabies on their land'. Plan rule 6.4.1 should apply to all land in the Containment Area.	Amend rule 6.4.2 to apply to all land in the Containment Area	Reject	Rule 6.4.2 is specifically a good neighbour rule, which can only be enforced under a number of conditions, one of which is where the occupier of adjacent land is taking reasonable steps to manage the pest. Rule 6.4.1 requires all land to be kept at or below level 3 on the Guilford Scale regardless of neighbour control. However, rule 6.4.1 does not apply to the Crown, whereas 6.4.2 does.
18.14	Frank, Hermann	Also, it would be more effective and guarantee better outcomes, if the control programme would be coordinated by the Regional Council and paid out of a mixture of general and targeted rate. The current RPMS has not achieved to control the spread of this highly mobile species.	Amend provisions for the control programme for wallabies to be coordinated by the Regional Council and paid out of a mixture of general and targeted rate.	Note	We accept that a number of submissions have requested investigation of, or the establishment of a wallaby control unit/board. Greater information is required to ensure that the benefits of doing this would outweigh the costs. This exercise will be undertaken outside of the RPMP process, as part of the wider council biosecurity programme. The council currently facilitates joint occupier wallaby control operations.
27.3	Taylor, R E	It is very important to control wallabies' spread into Canterbury. They should if possible be eliminated north of the Waitaki as they represent a significant threat to the few remnants of native bush that survive on our lowlands. I manage a 3HA one of these QEII bush covenants at Geraldine and can only afford to trap/kill possums and fence it against wandering sheep and goats, not jumping wallabies or deer.	Amend provisions to eliminate wallabies north of the Waitaki	Note	We agree with the submitter's comment, but without further significant investment, sustained control is the only achievable objective currently for Bennett's wallaby in South Canterbury.

42.3	Ashburton District Biodiversity Working Group - Bert Hofmans	<p>We oppose the proposed implementation measures for controlling Bennetts Wallaby.</p> <p>Members of conservation groups within the Ashburton area have noted with alarm, the spread and increase in numbers of wallabies in South Canterbury. Recent sightings close to the south bank of the Rangitata, and on the south side of the Waitaki are seen as an indication that current control measures are not effective. There is a real concern that Wallabies will cross the Rangitata very soon and the effect of their browsing habits on the sensitive ecosystems of the Hakatere Conservation Park have the potential to be catastrophic.</p> <p>That three men can go onto a single property and shoot 250 wallabies in a weekend (pers.comment A. Sinclair) indicates the wallabies' prevalence and the ineffectiveness of current control measures. The increase of wallaby populations has particularly been noted since the disbanding of the Wallaby Pest Board. An increase in wild pig populations in recent years has also been a source of concern.</p>	<p>Oppose</p> <p>Amend wallaby provisions to strengthen implementation measures.</p>	Note	<p>We accept that a number of submissions have requested investigation of, or the establishment of a wallaby control unit/board. Greater information is required to ensure that the benefits of doing this would outweigh the costs. This exercise will be undertaken outside of the RPMP process, as part of the wider council Biosecurity programme. The council is currently facilitates joint occupier wallaby control operations.</p>
42.4	Ashburton District Biodiversity Working Group - Bert Hofmans	See submission point 42.3	Amend wallaby provisions to include local stakeholders and landowners on any wallaby control entity.	Note	<p>There is not currently a wallaby control entity, but the council works to facilitate wallaby control among groups of land occupiers, and appreciates the value of local knowledge.</p>

42.5	Ashburton District Biodiversity Working Group - Bert Hofmans	See submission point 42.3	Ensure that whenever possible prosecute those who spread either wallabies or wild pigs into areas where they are not currently present.	Note	We agree that it is important to take action against people holding or transporting wallabies outside of the containment area. Please note that wild pigs are not proposed to be classified as pests under the RPMP, but they are covered under the Wild Animal Control Act, administered by the Department of Conservation.
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46.1	Wainui Station and Viewfield - Walter Cameron	<p>Wallaby Infestation has become a huge problem in Sth Canterbury has a major impact on the production of our properties. In the 1980s early 90s-1080 rabbit control was administered by Environment Canterbury in conjunction with property owners. This was very effective in eradication of juvenile wallabies. My understanding is that funding was a combination of general and target rates. The successful introduction of the rabbit virus meant that the use of 1080 has diminished. The wallaby population has exploded out to unprecedented levels causing them to infest country that never had a wallaby population. Our wallaby control program has been a combination of professional shooters, commercial helicopters and recreational shooters. Over the last 3 years we have averaged a kill of 3000 wallabies per annum. Last year under notice from ECan we undertook 1080 poison of 600 hectares with a 100% wallaby kill on that area of land. This year we have undertaken an additional 600 hectares 1080 poison.</p> <p>All of this comes at a huge financial cost.</p> <p>This is a South Canterbury wide problem with infestation spreading to areas of Otago.</p>	<p>Oppose</p> <p>Insert provisions to establish cluster groups amongst farmers to undertake co-ordinated kill / poisoning of wallabies, it is a futile exercise for one property to undertake a poison unless neighbouring/adjacent properties undertake the same.</p>	Note	<p>We accept the submitter's comments regarding the need for coordinated kill / poisoning of wallabies, currently this does not occur until wallaby population levels have exceeded Level 3 on the Guilford Scale, but proactive facilitation of coordinated control will be considered as part of the council's wallaby work programme. Staff consider that this can be managed without amending the PRPMP.</p>
46.2	Wainui Station and Viewfield - Walter Cameron	See submission point 46.1	<p>Oppose</p> <p>Amend provisions to ensure stronger regulations with defaulters</p>	Note	<p>The submitter has not provided enough detail for staff to make recommendations to changes in the plan, and would benefit from receiving further evidence and hearing discussions at the hearing.</p>

49.4	Kurow Pest Liason Committee - Peter Reid	<p>The KPLC wishes to encourage continued dialogue with Ecan over the present wallaby situation anecdotal evidence suggest numbers have increased and spread quite alarmly over the last five years- we know that `user pays' control hasn,t worked particularly well up until now. There are some combined poison operations involving several landowners taking place this winter and hopefully the success of these will see others wanting to get involved next year. Early communication and cooperation between all parties is the key to success on this.</p> <p>In the 2011-2015 plan the formation of a dedicated wallaby committee was mooted, this has never been pursued, however the KPLC feels that unless it had very clear objectives and outcomes it would make little difference over and above the work of the present Pest Liason Committees.</p>	Request that Ecan carry out a full cost analysis on the set up and operation of a specialized wallaby control unit to be funded by a region wide targeted and general rate.	Note	We accept that a number of submissions have requested investigation of, or the establishment of a wallaby control unit/board. We agree with the Kurow Pest Management Liaison Committee that greater information is required to ensure that the benefits of doing this would out weigh the costs. This exercise will be undertaken outside of the RPMP process, as part of the wider council Biosecurity programme.
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59.3	Timaru District Council - Bede Carran	<p>In our earlier submission on the Regional Pest Management Strategy Discussion Document, we indicated a preference for a Progressive Containment Programme for Bennetts Wallaby. We note that the proposed plan recommends a Sustained Control Programme.</p> <p>This pest remains of particular concern in our district. While we acknowledge the need to prioritise pest management needs and limited available resources, we still support a more aggressive approach towards the management of these pests, represented by a progressive containment programme. As mentioned in our earlier submission, we would support the possibility of a targeted rate to improve wallaby management</p>	Amend the provisions for Bennetts Wallaby to apply a Progressive Containment programme	Note	The objective of the Bennett's wallaby programme is for sustainable control within the Containment Area, and to preclude wallabies from establishing outside this area. Non-regulatory programmes will be undertaken outside the containment area. In some cases, eradication will be the goal, while around the external boundaries of the Containment Area a progressive containment objective will be applied.
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77.13	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part objective 6 and related good neighbour rule 6.4.2 seeking the sustained control of Bennett's Wallaby to ensure population densities remain at or below Level 3 on the Guilford Scale within the Wallaby contaminant area. It also supports precluding the establishment of populations outside the containment area. Sustained control will ensure effects of Wallaby populations on biodiversity and production values are minimised.</p> <p>LINZ however considers that an exemption should be included in rule 6.4.2 from having to control Wallaby where an effective boundary fence is in place along the entire length of the common boundary which prevents Wallaby's crossing into the neighbouring property.</p> <p>LINZ also questions whether this rule meets the criteria of a good neighbour rule in that it does not specify a distance from the boundary within which control of wallaby densities are required. LINZ would support the inclusion of an appropriate boundary distance; such as is proposed in DOC's submission.</p> <p>LINZ also considers that a rule should be included in Plan requiring occupiers to report Wallaby sightings outside the containment area. The inclusion of such a rule important in ensuring the containment aims of objective 6 are met.</p>	Support in part  Retain objective 6	Accept	
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77.14	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.13	<p>Support in part</p> <p>Amend good neighbour rule 6.4.2 as follows:</p> <p>Note: This is designated a Good Neighbour Rule An occupier within the Wallaby Containment Area shown on Map 2 in Appendix 3 shall, on receipt of a written direction from an Authorised Person, control Bennett's wallaby densities on land they occupy to at or below Level 3 on the Guilford Scale where the occupier of adjacent land is taking reasonable steps to manage wallabies on their land.</p> <p>The provisions of this rule do not apply where there is a boundary fence along the entire length of the common boundary of the property which is effective in preventing wallaby crossing into the neighbouring property.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	Reject	<p>Staff do not see the need to include this detail as part of the Good Neighbour Rule for wallabies. If a measure is in place which prevents wallaby spread across a boundary, this rule cannot be invoked (only to be applied when the spread affects neighbouring land). Secondly the wording suggested "effective" may be difficult for Biosecurity Officers to apply consistently.</p>
77.15	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.13	<p>Support in part</p> <p>Insert a rule under rule 6.4.2 requiring occupiers outside of the containment area to report any sightings of wallaby on their property to ECAN.</p>	Reject	<p>This rule is currently in the Regional Pest Management Strategy. From the limited number of calls/ notification received to date, this has not been an effective method to gather information on wallaby presence. Staff consider that this will be more effective through non-regulatory measures (such as through communications strategies).</p>

78.14	Department of Conservation - David Newey	The Director General recognises the benefit of a wallaby containment area and the wider benefit of preventing wallaby in other parts of Canterbury. The Director General notes there is no longer a rule whereby land occupiers are required to report wallaby sightings outside the containment area. Such a rule is useful to achieve plan Objective 6.2	Support in part  Insert a rule, or ensure there is an awareness plan that seeks land occupiers report the occurrence of wallaby outside the containment area.	Reject	This rule is currently in the Regional Pest Management Strategy. From the limited number of calls/ notification received to date, this has not been an effective method to gather information on wallaby presence. Staff consider that this will be more effective through non-regulatory measures (such as through communications strategies).
78.15	Department of Conservation - David Newey	The Director General does not agree that this rule meets the criteria of the of a good neighbour rule. Where there is effective fencing and there is no pest spread across a boundary issue, a good neighbour rule would not apply in this instance. The Director General recognises the need to keep wallaby levels at or below 3 on the Guilford scale and intends to control wallaby on DOC land to meet this requirement so long as it has sufficient funds. The Department has budget constraints as well as other pest control priorities that may require reprioritisation of limited funding (examples are the recent Myrtle rust incursion and an expansion of Russel Lupin work to meet the newly proposed threatened species strategy). We welcome opportunities to join any interproperty co-ordinated control approaches.	Oppose  Amend rule 6.4.2 to what would be an acceptable good neighbour rule. We suggest a 1km boundary distance for Bennetts wallaby. This is consistent with the document provided as supporting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits. During consultation, we had with Regional Council staff a 500m and 1km distance were options considered. Recognise that if an effective fence prevents wallaby from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.	Accept	Staff propose to include a 1 kilometre boundary distance to prevent spread to adjoining properties. See proposed rule amendment below:  Plan Rule 6.4.2  Note: This is designated a Good Neighbour Rule  An occupier within the Wallaby Containment Area shown on Map 2 in Appendix 3 shall, on receipt of a written direction from an Authorised Person, control Bennett's wallaby densities on land they occupy at or below Level 3 on the Guildford Scale, <u>within 1 kilometre of the boundary</u> where the occupier of adjacent land is taking reasonable steps to manage wallabies on their land.  Regarding the recognition of fencing, see submission point 77.14

78.16	Department of Conservation - David Newey	The Director General supports this rule. Public Conservation Land is normally available to recreational hunting and the activity is encouraged to reduce wallaby numbers. A reasonable time needs to be specified so hunters and DOC staff can continue this activity with full knowledge of closure periods.	Support in part  Amend rule 6.4.4 to specify time periods in the rule or make the closure periods well communicated to affected parties via an effective communications plan.	Reject	Where Crown land is involved in a shooting prohibition, staff will prepare a communications plan and work directly with the Department of Conservation.
81.3	QEII National Trust - Alice Shanks	Current wallaby control has not confined wallabys' to the agreed Containment area. We wish to see ECAN general rates invested in research and development to provide new tool and strategies to control and contain wallabies. We wish to see a more strategic monitoring to provide accurate information on location and numbers. The monitoring and economic impact needs to include their effect on indigenous biodiversity and the opportunity cost of restoring the browsed forest trees. We wish to see non-regulatory incentives in place to help landowner act in unison, across tenure boundaries, lead by a multi-agency agency committee with strong landowner representation, including ORC staff.	Support in part  Amend the RPMP to formulate a 20 year plan to reduce Bennett's wallaby numbers back to the current Containment Zone so it can then be managed as a "Progressive Containment" pest species. Fund wallaby research and planning through general rates.	Note	Staff agree with the submitter's comments on reducing the wallaby population back to the Containment Area. The measures that are outlined: research and development, more accurate information on locations and numbers and helping landowners act in unison, lead by landowner representatives are actions that sit in our wider Biosecurity programme. We do not consider that regulation through the RPMP is required to enact these measures, and they will contribute to the sustained control objective being met.
82.3	Ministry for Primary Industries - Sherman Smith	Similarly a suppression rule for wallabies, i.e. keeping them to below Guilford level 3 which directly manages the impacts of the pest, may be considered unreasonable for a GNR, as this does not prevent them from spreading.	Amend rule for wallabies to be consistent with the NPD	Accept	Staff propose to include a 1 kilometre boundary distance to prevent spread to adjoining properties. See submission point 78.15 for the proposed rule amendment.

85.1	New Zealand Defence Force - Stephen Phillipson	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.	Support in part  Insert clarification or a definition of what constitutes "establishment" of wallabies beyond the Containment Area.	Accept	We support this clarification, and recommend that this added as a note in the Principal measures to be used section: <u>Establishment means the confirmed presence in the wild, with a breeding population.</u>
85.2	New Zealand Defence Force - Stephen Phillipson	"Reasonable steps" needs to be defined or clarified as this is subjective and requires defined and measurable attributes so there is clarity around the obligations under the rule.	Support in part  Amend rule 6.4.2 to include clarification or definition of 'reasonable steps'.	Reject	'Reasonable steps' may be assessed on a case by case basis, and it may be restrictive to include the details of this in the rule.
85.7	New Zealand Defence Force - Stephen Phillipson	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.  The strategy and programmes for controlling wallaby outline 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 prevent the establishment of Wallabies outside of the Containment area). Aside from	Oppose  Amend provisions to ensure ECan staff or contractors do 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.	Reject	This rule is currently in the Regional Pest Management Strategy. From the limited number of calls/ notification received to date, this has not been an effective method to gather information on wallaby presence. Staff consider that this will be more effective through non-regulatory measures (such as through communications strategies).

		<p>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>			
85.8	New Zealand Defence Force - Stephen Phillipson	See submission point 85.7	<p>Oppose</p> <p>Amend provisions to split the Containment Area into two programmes: sustained control within the containment area and a programme of Progressive Containment in the buffer zone. 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>	Reject	Staff agree with the intention of this submission point. In order to achieve the overall objective of sustained control, greater work will need to occur to address pressure on the boundaries of the Containment Area (i.e. a Progressive Containment approach). This will be undertaken outside the RPMP, and without the need for specific rules. We do not consider this programme needs to be detailed in the RPMP.

85.9	New Zealand Defence Force - Stephen Phillipson	See submission 85.7	Oppose  Insert rules 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.	Reject	Staff do not consider that rules would be of benefit in these situations. The council is undertaking an eradication and control programmes outside of the Containment Area, with the support of occupiers. We consider that the greatest gains will be from research and development for wallaby identification.
85.10	New Zealand Defence Force - Stephen Phillipson	See submission 85.7	Oppose  Amend the provisions to create a buffer zone, ensuring this has actions and rules placed around it to ensure that its objective can be achievable over the 10 year plan.	Reject	See submission point 85.8
88.9	Forest and Bird - Jen Miller	F&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. F&B supports the Bennett's wallaby Objective, Principle Measures and Rules as proposed but wish to put on record concerns about implementation.  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	Support in part  No specific decision requested relating to the RPMP. However, 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.	Note	We agree that the implementation of the RPMP and establishing other non-regulatory measures to control wallabies is critical to ensure that wallabies do not spread beyond South Canterbury. The council is currently working to establish a non-regulatory work programme with Otago Regional Council, and will look to include land occupiers and Crown agencies.

		<p>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>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>			
88.10	Forest and Bird - Jen Miller	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.	<p>Oppose</p> <p>Amend the explanation for rule 6.4.2 to the purpose of the rule as opposed to rule 6.4.1</p>	Accept	<p>Rule 6.4.2 is specifically a good neighbour rule, which can only be enforced under a number of conditions, one of which is where the occupier of adjacent land is taking reasonable steps to manage the pest. Rule 6.4.1 requires all land to be kept at or below level 3 on the Guilford Scale regardless of neighbour control. However, rule 6.4.1 does not apply to the Crown, whereas 6.4.2 does apply.</p> <p>Staff propose to provide greater clarity by amending the explanation of the rule, as below:</p>

					<p>The reason for this rule is to ensure population levels remain below the threshold at which economic well-being and biodiversity values are threatened.</p> <p><u>The rule is required in addition to Plan Rule 6.4.1 to manage the spread of Bennett's wallaby causing unreasonable costs to an adjacent occupier where active Bennett's wallaby management is being undertaken by that land occupier.</u></p>
93.2	Otago Regional Council - Warren Hanley	<p>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 [to progressive containment and eradication].</p> <p>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.</p>	No specific decision requested	Note	Staff note these comments and agree that the increase is likely to be a result of human assisted release. Further surveillance (requiring tools which are not yet available) would be required to confirm natural migration from the containment area.
93.3	Otago Regional Council - Warren Hanley	<p>Wallaby Within the Containment Zone (6.3 – Progressive containment). ORC fears that the 6.4 sustained control approach will lead to a continued increase of populations.</p>	Amend the RPMP to set a progressive containment objective for wallaby inside the containment area, to be achieved through coordinated wallaby control by an	Reject	Staff consider that a progressive containment approach for the containment area is not achievable. In order to achieve a progressive containment objective, greater resources would be required, both financial as well as new technology to detect

		<p>Listing wallaby inside the containment zone separately under 6.3 would have the following benefits</p> <ul style="list-style-type: none"> <li>• Continually relieve pressure from the containment zone boundaries.</li> <li>• Reduce costs to stake holders and the environment within the containment zone.</li> <li>• Reduce public access to wallabies and human assisted movement.</li> <li>• Support the wallabies unwanted organism status.</li> </ul> <p>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.</p>	ECan approved body.		<p>wallabies. Staff agree that a coordinated approach to wallaby control is central to effective management, and note that the council can provide facilitation where required. The council and Otago Regional Council are working together to establish a non-regulatory joint approach to wallaby management, this may include leveraging funding from partners, both for control and development of new technology.</p> <p>Staff acknowledge that greater work will need to occur to address pressure on the boundaries of the Containment Area, and we will be taking a strategic approach to control to ensure the success of the sustained control objective.</p>
93.4	Otago Regional Council - Warren Hanley	<p>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.</p>	Amend the RPMP to set an eradication objective for wallaby outside the containment area.	Reject	<p>In order to achieve the overall objective of sustained control, greater control work is required to eliminate wallabies outside of the containment area. In some areas, where feasible eradication is the objective. The council are leading on this control, with cooperation from occupiers and staff do not consider that regulatory support is required to achieve this. In other cases, effective control requires an advance in technology to be able to detect wallabies. There is a current project working to progress thermal imaging detection for wallabies.</p>
93.5	Otago Regional Council - Warren	<p>ORC support plan objective 6(ii) preclude the establishment of</p>	Amend the RPMP to include the definition of "established" and how it	Accept	<p>We support this clarification, and recommend that this added as a note in the Principal measures to be</p>

	Hanley	Bennett's 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.	is to be measured.		<p>used section: <u>Establishment means the confirmed presence in the wild, with a breeding population.</u></p> <p>The measurement of this is managed in the Monitoring table (table 32), and staff recommend an update to this as there is a monitoring programme not reflected in this. Recommended insert is below:</p> <p><b>Anticipated results:</b> No established populations of Bennett's wallaby outside of the containment area</p> <p><b>Indicator:</b> Absence outside of area</p> <p><b>Method of monitoring:</b> <u>Population assessment</u></p> <p><b>Frequency of monitoring:</b> <u>Annual</u></p> <p><b>Reporting to Council:</b> <u>Annual</u></p>
93.6	Otago Regional Council - Warren Hanley	See submission point 93.5 for context	Amend the RPMP to include a map appendix of wallaby already known to be outside of the containment zone and list this separately under 6.2 in the plan.	Reject	Staff do not consider that regulatory tools are required to eradicate wallaby outside of the containment area. Including a map would not add any value, as the council is leading on wallaby control. Staff also note that this information is available in the report undertaken by A. David M. Latham, Landcare Research; M. Cecilia Latham, Landcare Research; Bruce Warburton, Landcare Research 'Review of current and future predicted distributions and impacts of Bennett's and dama wallabies in mainland New Zealand'
93.7	Otago Regional Council - Warren Hanley	ORC agrees with the rules set out in the draft plan however we submit that additional rules should be included.	Amend the RPMP to insert a rule requiring any person outside of the containment zone shown on map 2 appendix 3 to report wallabies seen, destroyed and any sign identified to ECan within two working days. Also, require ECan to keep a record of all reports of wallabies seen, destroyed and signs identified outside of the containment zone and make this	Reject	<p>This rule is currently in the Regional Pest Management Strategy, from the limited number of calls/ notification received to date, this has not been an effective method to gather information on wallaby presence. Staff consider that this will be more effective through non-regulatory measures (such as through communications strategies).</p> <p>Staff are able to provide information held regarding wallaby sightings and identification to other regions upon request.</p>

information available to other regions.

## Funding

Number	Name	Submission	Relief	Staff Recommendation	Reasons
6.22	Ross, Fraser Bell	Funding: landowners should have a good level of responsibility for the controlling of weeds and pests on their properties and provide some funding, at least. However, where there are special biodiversity values present on private land then funding from other sources could be appropriate.	Ensure that other funding sources are considered for private land that has special biodiversity values.	Note	The Cost Benefit Analysis undertaken as part of the PRPMP review identified where the control of specific pests will benefit biodiversity and applies a proportion of the costs to the regional community, as requested by this submission.
6.24	Ross, Fraser Bell	Monitoring: ECan must provide adequate funding and staff resources to ensure that the provisions of the Plan, when adopted, are indeed implemented. So, that biological values are indeed enhanced and protected for the longer term.	Ensure that there is adequate funding and staff resources to implement the provisions of the plan	Accept	Programmes and objectives proposed in the PRPMP have been assessed to ensure that the council is able to deliver them. Funding and staff resourcing is determined through the Long Term Planning and Annual Plan processes.
12.2	McNeill, Steve	Oppose  The current delivery of pest management in Canterbury is currently failing on several fronts. a) Responsibility for pest control. (iii) central government should fund wilding pine control for those areas planted as experimental plantations by government departments in the past eg Castle Hill, Craigeburn area.	Amend RPMP to provide for central government funding of management of wilding pines from Government experimental plantations	Reject	Central government is currently assisting with wilding conifer control in priority areas within the Wilding Conifer Zone. The funding arrangements for this are coordinated outside of the RPMP process, especially because central government and local government (territorial authorities) are unable to be bound to funding agreements in the PRPMP.

12.4	McNeill, Steve	c) Compliance monitoring. (i) As with many Ecan activities compliance monitoring funding and staffing levels seem to be lower than required.	Oppose  Insert provisions to ensure adequate funding for monitoring and compliance provided	Note	Programmes and objectives proposed in the PRPMP have been assessed to ensure that the council is able to deliver them. Funding and staff resourcing is determined through the Long Term Planning and Annual Plan processes.
16.1	Spencer, Fiona	I wish to oppose the proposal of changing the rating of Nassella Tussock from 50-50 to 75-25 to landowner. I do not believe that this is only a landowner problem - the district as a whole needs to be vigilant on this weed to manage the decline of it.	Oppose  Amend the nassella tussock of 50-50 as the district as a whole needs to be vigilant on this weed to manage the decline of it.	Reject	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis and don't recommend changes to this. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.  (Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)
17.2	QEII National Trust - Rob Smith	See submission point 85.1	Amend the RPMP to raise the funds for the regional council to have authority to coordinate wallaby control by a targeted rate	Note	See submission point 17.1
32.2	Hurunui Nassella Tussock Liaison Committee - Stewart Gibb	This plan proposal of Nassella Tussock funding is a major change from that which has been in place since the first strategy under the Biosecurity Act. The current inspection funding is 50 : 50 occupiers and	Amend the funding formula for Nassella Inspection rate Occupiers 50%, Regional Community 50% - the status quo	Reject	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to the funding split. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It

regional community. The proposal is 75 : 25.

As noted, control work is 100% the responsibility of landowners. Most nassella is present on extensive hill country properties. Control is by landowners, staff and paid contractors. The only viable method of control remains walking the country and removing plants with hand tools. The area covered per hour depends on ground-cover and plant numbers, but 1-3 hectares per hour is normal. Hourly rates range between \$30-45. This is done every year. The cost to landowners over the Hurunui Nassella area is several million dollars per year.

Nassella is a prolific seeder. Seed is wind-borne. Once aloft it can travel long distances. It can also be vectored on produce and vehicles. There are large benefits to landowners outside infested properties, and outside the known infested area from this control work. Nassella is capable of displacing our native tussocks and other native plants if left unchecked. Landowners in the proposed Hurunui Nassella rating area represent the "thin red line" preventing the widespread dispersal of this pest.

We also note that under the Biodiversity rules Environment Canterbury and District Councils have recently restricted the ability of landowners to remove native species such as matagouri. This removes an important tool from landowners as it is impossible to find nassella which grows and seeds within matagouri

would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.

(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)

		<p>bushes. The removal of matagouri and other scrub has been a major factor in getting good progressive control on much of our hill country. In imposing this we suggest that the wider region is exacerbating the problem.</p> <p>Part of the Hurunui Nassella Pest budget is for publicity, education and advice. This is of wider benefit to the community than to landowners dealing with nassella.</p> <p>Landowners accept responsibility for control. However there is a clear benefit to the wider region from this massive on-going control operation, and from the costs associated with inspection and enforcements of the rules within this plan. Please note that Hurunui landowners are also paying the general rate.</p>			
49.2	Kurow Pest Liason Committee - Peter Reid	<p>The KPLC does not accept the change in funding formulae for inspection as outlined in Table 36 for rabbits, wallabies, nassella tussock, Chilean needle grass, broom, gorse and some other pest plants where there has been a shifting of costs from the general rate to in some cases fully funded by the occupier in the way of targeted rates and is disappointed this was not discussed at earlier plan meetings. If the occupier has to pay the full and increased costs for rabbit and other plant and animal inspections this effectively becomes 'user pays' and they should then be able to say who comes onto their properties in this regard either Ecan staff or private contractors – this will</p>	Retain the funding formulae as set out in the RPMS	Reject	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to this. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of</p>

inevitably lead to conflicting inspection results and a loss of goodwill on the part of the landowner. It will also mean they effectively pay twice if control work is required.

As earlier stated pest management is a collective responsibility and the KPLC SUBMITS that the status quo of funding for inspection and monitoring remains the same as in the present plan.

It is noted in Table 39 regarding the annual cost of implementing the proposed plan, targeted and uniform rates will rise dramatically by around \$900,000.00 whilst the general rate increase is only \$100,00.00 . Land occupiers by far face a huge increase in targeted rates.

We also note the discrepancy between figures on Table 37 for the economic analysis from the CBA report on wallaby funding regarding inspection costs and that put forward on Table 36. We are told this is an error but it is confusing to the reader and should have been fixed prior to the plans release.

All plant and animal pest control has an economic benefit to the whole region through increased biodiversity values and on farm production, money spent on expensive poisoning operations for example is `dead ` money in that it could have been used elsewhere for farm development or flow out through the local community in other spending and another reason we feel the status quo for funding should remain.

whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)

Please note that staff recommend to amend Chilean needle grass inspection funding formula to reflect the same approach as for nassella tussock. Recognising the regional benefit from the biodiversity impacts, and also the ability of the seed to spread easily by many vectors. Staff recommend that table 36 is updated as below:

### **Chilean needle grass**

Inspection Occupiers ~~400-75~~ The regional community ~~0-25~~

49.3	Kurow Pest Liason Committee - Peter Reid	See submission point 49.2	Amend the discrepancy between figures on Table 37	Accept	We recommend that table 37, wallaby inspection within the containment area be amended to 80% occupiers, 20% the regional community - per the recommendation from the Cost Benefit Analysis.
53.7	Rural Advocacy Network - Jamie McFadden	The funding formulae changes are inconsistent and illogical. Previously pests like rabbits, Chilean needle grass and gorse inspections were partly funded by the general ratepayer in light of the wider community benefits. However this latest plan has no general ratepayer input which raises questions about the robustness of the funding formulae rationale. We submit that all pests should have as a minimum at least 50% wider community funding for inspection costs.	Amend provisions to ensure that all pests have as a minimum at least 50% wider community funding for inspection costs.	Accept in part	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis (CBA), and don't recommend changes to this. The CBA has identified the wider community benefits, and recommended cost divisions accordingly.
53.11	Rural Advocacy Network - Jamie McFadden	Funding. (table 36: pages 88 – 90) Our submission is that greater recognition needs to be provided in the funding rationale for the wider benefits of pest control and historical context of pest spread. The incursion of pests into New Zealand should not be blamed on farmers but is a legacy of the development of our country. Landowners spend considerable amounts of money on controlling pests each year and this delivers significant conservation, recreational and visual landscape benefits. Many landowners have retained extensive areas of native bush and/or shrublands and there is increasing pressure from the wider community to prevent landowners from removing indigenous vegetation. Retaining	Amend provisions to ensure that funding decisions reflect the benefits to the wider community.	Reject	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis. This considers the impact to the wider community. Staff do not recommend changes to this.

		indigenous vegetation on farms exacerbates pest issues and makes pest control much more difficult. We submit the funding formulae be revised to reflect the wider community benefits.			
53.12	Rural Advocacy Network - Jamie McFadden	<p>Refer to submission point 53.11 for context.</p> <p>Gorse and broom: Table 35 on page 85 has understated the wider benefits of broom and gorse control.</p> <ul style="list-style-type: none"> <li>• A number of rivers e.g. upper Hurunui and Clarence are becoming choked with weeds particularly gorse and broom. This is compromising recreational access for fishing, swimming and kayaking. The spread of gorse and broom also negatively impacts on activities like biking, tramping and compromises landscape values.</li> <li>• Many broom and gorse issues have spread from public land particularly riverbeds and transport corridors.</li> <li>• The biodiversity impacts are understated. Broom and gorse are taking over some of our hill and high country low shrublands, tussocklands and shrub subalpine vegetation.</li> <li>• Broom and gorse act as nurse plants for wilding pines which out compete all native species. These weeds also provide habitat for other pests such as cats, ferrets, possums etc.</li> <li>• The Port Hills fires</li> </ul>	Amend gorse and broom funding provisions for inspections to be 25% landowner 75% regional community.	Reject	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to this. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)</p>

		demonstrated the problem with allowing the spread of gorse and the wider community benefits of gorse control. Our submission is for broom and gorse inspection to be 25% landowner 75% regional community.			
53.13	Rural Advocacy Network - Jamie McFadden	See submission point 53.11 for context  Nassella: We oppose the change in inspection funding ratio from 50:50 to the proposed 25% general rate, 75% targeted rate. Left unchecked nassella can take over low growing native tussock shrubland such as Celmesia sp, Linum monogynum, Poa colensoi, Pimelea prostata etc. Nassella occurs on many lifestyle blocks and currently some of these properties have their control work funded by rates. We submit nassella inspection remain 50/50.	Oppose  Amend nassella funding provisions for inspections remain 50/50 [general/targeted rate]	Reject	See submission point 53.12, in addition to this, the Cost Benefit Analysis considers the damage to biodiversity through the displacement of native tussock grassland.
53.14	Rural Advocacy Network - Jamie McFadden	See submission point 53.11 for context  Chilean Needle Grass has similar biodiversity impacts as nassella and we submit the inspection funding rationale split should be the same as nassella.	Amend Chilean Needle Grass funding provisions for inspections to be the same as nassella [50/50 general/targeted rate]	Accept in part	Staff recommend amending Chilean needle grass inspection funding formula to reflect the same approach as for nassella tussock. Recognising the regional benefit from the biodiversity impacts, and also the ability of the seed to spread easily by many vectors. Staff recommend that table 36 is updated as below:  <b>Chilean needle grass</b>  Inspection Occupiers <del>40-75</del> The regional community <del>0-25</del>
53.15	Rural Advocacy Network - Jamie McFadden	See submission point 53.11 for context	Amend rabbit funding provisions for inspections funding split to be 50% occupiers, 50% regional community	Reject	See submission point 53.12

		<p>Rabbits. Prior to RCD when rabbit numbers were high there was a significant impact on native vegetation. Rabbits eat regenerating seedlings and ringbark native trees and shrubs. While rabbit numbers have significantly decreased some urban and semi-rural areas remain a concern. One of the worst areas in the Cheviot area is around the Hurunui Huts village and riverbeds. Another concern is that an increase of rabbits leads to an increase in unwanted predators such as cats, ferrets and stoats which in turn predate on native wildlife. These issues need to be reflected in the funding split and our submission is that for rabbits the inspection funding split be 50% occupiers, 50% regional community.</p>			
56.1	Hurunui District Council - Stephanie Chin	<p>HDC is concerned about the general direction of the strategy and the financial implications it would impose on land owners. HDC considers these changes would not apportion costs and benefits fairly.</p> <p>HDC is opposed to the increased targeted pest management (occupier) rate, set out in Table 36, for Nassella tussock and Chilean needle grass. For Nassella tussock, which is prevalent within Hurunui District, the regional community rate for inspections is proposed to decrease from 50% to 25% and the occupier funding is proposed to increase from 50% to 75%. For Chilean needle grass the regional community rate for inspections is proposed to decrease from 50% to 0% and the occupier funding is proposed to increase from</p>	<p>Oppose</p> <p>Amend the RPMP to retain the current inspection funding split of 50/50 as per the existing Regional Pest Management Strategy.</p>	Reject	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to this. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The 25-75 funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)</p>

		<p>50% to 100%. HDC has concern about the financial implications of this for land owners, given the prevalence of these two pests within Hurunui District. HDC is conscious that the costs of this pest control can be sizable for land owners, and that the result of this pest control has benefits for both land owners and the general public. As such, HDC does not consider it appropriate that occupiers bear increased inspection costs for pests that they are required to actively manage and control, given the contribution this makes to the general biodiversity values of an area.</p> <p>For both Nassella tussock and Chilean needle grass the inspection funding split under the current Pest Management Strategy is a 50/50 split. HDC favours the 50/50 split being maintained and oppose the proposed increases.</p>			<p>Please note that staff recommend to amend Chilean needle grass inspection funding formula to reflect the same approach as for nassella tussock. Recognising the regional benefit from the biodiversity impacts, and also the ability of the seed to spread easily by many vectors. Staff recommend that table 36 is updated as below:</p> <p><b>Chilean needle grass</b></p> <p>Inspection Occupiers <del>400-75</del> The regional community <del>0-25</del></p>
56.2	Hurunui District Council - Stephanie Chin	<p>HDC strongly supports the submissions prepared by Federated Farmers and the Rural Advocacy Network with regard to the matters raised in point 4 [submission point 56.1] above. The Federated Farmers submission contains a breakdown of the anticipated costs and revenues. HDC supports their positions in relation to the sections of their submission titled "Proposed increase to landowner contributions" and "Proposed inspection cost increases". In particular, HDC supports the following position: "Federated Farmers strongly opposes the considerable increase in landowner biosecurity contributions through the</p>	<p>Amend the RPMP to recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides.</p>	Reject	<p>The Cost Benefit Analysis undertaken as part of the PRPMP review has already identified where the control of specific pests will benefit biodiversity and recommends applying a proportion of the costs to the regional community.</p>

		<p>targeted pest rate. Federated Farmers asks that Environment Canterbury recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides."</p> <p>With regard to the Rural Advocacy Network submission, HDC supports their position on Nassella tussock funding and Chilean needle grass funding.</p>			
57.1	The Canterbury Chilean Needle Grass Pest Management - Charles Wiffen	<p>With regards to Chilean needle grass, we oppose the 100% occupier funded rate for inspection and control. The funding rationale in the Cost Benefit Analysis document (Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits Report prepared for Environment Canterbury as part of the preparation of a Regional Pest Management Plan) refers to the impacts of Chilean needle grass being agricultural, but makes no mention of the wider implications to Canterbury's economy and environment that the spread of Chilean needle grass could cause.</p> <p>Chilean needle grass has the potential to negatively affect environmental values by invading natural landscapes and reducing biodiversity, in a similar manner to parts of Australia where it has had a negative impact on rare native plant species (Faithfull, 2012).</p>	<p>Oppose</p> <p>Amend the funding formulae for Chilean needle grass, taking into account all potential impacts and not those solely related to agriculture. We would like the funding formulae to be split 50% occupier and 50% wider regional rate for inspections and control to reflect the potential impacts to the environment, tourism and recreation in the region.</p>	Accept in part	<p>Staff recommend amending the Chilean needle grass inspection funding formula to reflect the same approach as for nassella tussock. Recognising the regional benefit from the biodiversity impacts, and also the ability of the seed to spread easily by many vectors. Staff recommend that table 36 is updated as below:</p> <p><b>Chilean needle grass</b></p> <p>Inspection Occupiers <del>400-75</del> The regional community <del>0-25</del></p>

		<p>In addition to the loss of biodiversity values, spread to public land could result in a loss of recreational areas, as has been seen in Marlborough with recent infestations identified at the Wither Hills Farm Park and Omaka airfield. Such infested areas may need to be closed to the public during seeding season (Nov – April) and organised events could be adversely affected to avoid the risk associated with people and vehicles spreading the plant. This could result in a loss of tourism opportunities and associated revenue in North Canterbury, at a time when many businesses are already struggling with the after effects of the November 2016 earthquake.</p> <p>As the spread of Chilean needle grass has the potential to affect both rural and urban dwellers across the region, the burden of preventing this should not lie solely with rural land occupiers but should come from the wider regional community.</p>			
57.2	The Canterbury Chilean Needle Grass Pest Management - Charles Wiffen	<p>We would also like to note that the way in which the funding formulae is described in the proposed RPMP document is difficult to understand and requires greater clarification going forward. For example in the instance of Chilean needle grass, 100% 'occupier' funded inspections actually refers to a 'targeted rural rate on productive land', which is only detailed on page 103 of a separate document. For the general public this could be confusing and easily lead to misinterpretation.</p>	<p>Oppose</p> <p>Amend the display of the funding formulae to be less ambiguous and easier for the general public to interpret and understand.</p>	Reject	<p>Staff acknowledge that the funding formulae does not explain the different ways in which occupiers may be required to fund pest activities. This could be through Pest District rates, rates on productive or prone land, or a direct cost to undertake control. The reason this is not indicated in the PRPMP is because the rating mechanism is set under the Long Term Plan's Revenue and Financing Policy and Rating Funding Impact Statement.</p>

60.2	Bleasdale, Chris	<p>I oppose the concept that the landowner should bear the entire responsibility for this objective</p> <p>Detail of Decision Required and concerns to be addressed: I request that consideration be given to a more equitable approach to this huge problem that exists not only due to the current owner's management of the land. Financial assistance with chemicals would be appropriate or access to ECan appointed gorse control contractors at discounted rates could be possible ways to help land owners.</p>	<p>Oppose</p> <p>Amend provisions to provide a more equitable approach to this huge problem that exists not only due to the current owner's management of the land. Financial assistance with chemicals would be appropriate or access to ECan appointed gorse control contractors at discounted rates could be possible ways to help land owners.</p>	Reject	<p>The Cost Benefit Analysis undertaken as part of the PRPMP review has identified the beneficiaries and the exacerbators for gorse. The key beneficiaries include the rural occupiers for the long-term protection of economic values, neighbouring properties for the prevention of spill-over, and some regional community benefit for the protection of biodiversity, recreational access and landscape values. The key exacerbators include occupiers not controlling gorse on their properties, and persons who knowingly sell, propagate or distribute gorse. From this analysis, the recommendation for control costs sit with occupiers as exacerbators.</p>
60.3	Bleasdale, Chris	<p>Part / Page No. : Page 85 (Broom &amp; Gorse)</p> <p>I oppose the wording under the headings "Beneficiaries" and "Exacerbators" Detail of Decision Required and concerns to be addressed: "Beneficiaries" should include the Tourism Industry and the wider Canterbury Community. "Exacerbators" should include birds, animals and the wind.</p>	<p>Oppose</p> <p>Amend provisions for Broom and Gorse "Beneficiaries" to include the Tourism Industry and the wider Canterbury Community, and "Exacerbators" to include birds, animals and the wind.</p>	Reject	<p>Staff consider that the tourism industry is captured as part of the regional community beneficiary description. It is not possible to include non-human exacerbators (birds, animals and the wind)</p>
60.4	Bleasdale, Chris	<p>Part / Page No. : Page 89 "Funding Formulae" (Gorse) I oppose the proposed funding formula for this objective.</p> <p>Detail of Decision required and concerns to be addressed: I am of the opinion that it is grossly unfair to expect the land Occupier to be financially responsible for the entire REAL costs of this objective.</p>	<p>Oppose</p> <p>Amend Gorse funding provisions to not require the land occupier to be financially responsible for the entire REAL costs of this objective.</p>	Reject	<p>See submission point 60.2</p>

		<p>The standard, frequency and quality of “Advocacy and Advice” and “Monitoring” by ECan in my experience has been abysmal in the past and therefore of no worthwhile contribution to the problem. Funds would be better allocated to assisting Occupiers with the cost of the practical measures needed to control gorse.</p> <p>It is noted in the Proposal that 100% of the cost of “Inspection” is allocated to the Occupier.</p> <p>However, it is not clear from the document what constitutes an inspection, by whom and at what frequency. Moreover, there is no mention of how this “Inspection” cost is recovered by the Occupier. I fundamentally oppose any proposal that the Occupier shall pay for an inspection.</p>			
63.2	Stackhouse Farm Ltd - Adrienne Stackhouse	The 10-year plan proposed, will transfer more costs to landowners. See submission point 63.1 for further context	Amend the funding provisions for Nassella Tussock to provide an increase in financial input from ECan	Reject	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to this. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier"</p>

					portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)
69.3	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	<p>The Mackenzie Basin Wilding Tree Trust agrees with the following statements in the “Alternatives considered”: “Relying on occupiers to undertake voluntary control to prevent adverse impacts of pests in table 11 is not considered viable. .... The uneven spread of invasions places an inequitable burden on those occupiers whose property is infested.”</p> <p>The Mackenzie Basin Wilding Tree Trust submits that the funding model that is contained in the New Zealand Wilding Conifer Management Strategy 2015-2030, Appendix II on Page 29, be adopted as a rule in order to give certainty to all parties (occupiers, regional and central government) regarding their respective funding obligations under this plan. This would be Rule 6.3.3</p>	Insert new rule to outline respective funding obligations under the RPMP, this would be rule 6.3.3	Reject	The funding arrangements for the wilding conifer operations are coordinated outside of the RPMP process, especially because central government and local government (territorial authorities) are unable to be bound to funding agreements in the PRPMP.
72.5	Waimakariri District Council - Geoff Meadows	<p>Setting out the five pest management programmes on page 18 is clear and directs readers and users of the plan to how the desired control levels are to be achieved It is pleasing to see that the directions on Good Neighbour Rules contained in the National Policy Direction for Pest Management 2015, and setting out the requirements that must be met for the rule to bind the Crown, are included in the proposed Pest Management Plan.</p> <p>However with the increasing emphasis</p>	Amend provisions in the RPMP to ensure there is an extension network of biosecurity staff to inform and advise landholders of best-practice pest management	Note	Staff accept this comment, and note that this role will be fulfilled by the existing teams of Biosecurity Officers. Further discussion of this is a matter for the Long Term Plan process.

		<p>on individual land holder responsibility, an extension network of biosecurity staff that informs and advises landholders of best-practice pest management (or assists with incorporating biosecurity measures into farm management plans) would be a welcome initiative. This is alluded to under Advocacy and Education on page 19.</p>			
74.2	Federated Farmers - Lynda Murchison	<p>Federated Farmers strongly opposes the considerable increase in landowner contributions through the targeted pest rate. It is well recognised that many pest species have a biodiversity impact alongside their economic impact and much of the landowner funded pest control in the region also contributes to biodiversity. The focus of Government led pest control activity, as highlighted in the proposed RPMP, also shows a shift towards biodiversity protection. In many instances Canterbury farmers are expected to not only provide and protect indigenous biodiversity habitat on private land in the region, but to control the pest species that threaten this biodiversity and then fund the inspection work to ensure their own compliance.</p> <p>As highlighted in the tables below from the current RPMS and the RPMP, there is a proposed annual increase in pest management costs of over \$600,000 per year. Despite this, the General Rate contribution to pest control has decreased by over \$80,000 per year, and instead a significant increase in targeted pest rates of over \$850,000 per year is</p>	<p>Oppose</p> <p>Amend the RPMP to recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides.</p>	Reject	<p>The Cost Benefit Analysis undertaken as part of the PRPMP review has identified where the control of specific pests will benefit biodiversity and recommends applying a proportion of the costs to the regional community.</p>

		<p>proposed. This increase is justified with less information than the previous RPMS and with very limited consultation with the affected landowners on the details of these changes. Farmers recognise the importance of both pest management and indigenous biodiversity and make considerable personal contributions towards pest control. If Environment Canterbury wants private landowner engagement on the public good that is biodiversity they need to support and work alongside landowners rather than pushing more cost and compliance on farmers with little justification.</p>			
74.3	Federated Farmers - Lynda Murchison	<p>Federated Farmers strongly oppose the proposed increase in inspection/monitoring costs as outlined in Appendix 1. Inspection costs are for the benefit of the region as well as the individual, and Federated Farmers considers that these should be at least shared 50/50 General Rate and Landowner Contribution. Federated Farmers understands the importance of compliance inspections to ensure that the rules of the RPMP are followed, but it is difficult to understand the reasoning that landowners should have to pay for inspections to comply with Environment Canterbury rules when in almost all cases they have already borne the majority of costs for the pest control in the first place. When this sits alongside increasing environmental regulation costs through the Environment Canterbury Land and Water Plan, farmers are faced with a huge financial burden of</p>	<p>Oppose</p> <p>Amend the provisions in the RPMP to set Inspection costs as a 50/50 General Rate and Occupier shared cost. This would serve to reduce the considerable landowner costs and increase the General Rate share for pest control activity that benefits both private landowners and the general public - as is recognised in other regions. For example, in the Marlborough region there is no charge for inspections for species such as rabbits and nasella tussock which are under very similar pest control programmes as those in Canterbury.</p>	Reject	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to the funding split. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However, the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)</p>

		environmental compliance costs when this money could be better spent delivering actual environmental work on the ground.			
75.2	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga is supportive of the openness of the Council to working with other groups, including funding such groups, to achieve pest management goals. Additionally, we support the provision for site-led programmes wherein Ngai Tahu, or any other individual or group, may contact the Regional Council and receive assistance in establishing programmes to manage pests on sites that they consider significant. It is essential that funding is set aside in the next Long Term Plan to ensure these site-led programmes can be appropriately supported	Ensure that funding is set aside in the next Long Term Plan to ensure these site-led programmes can be appropriately supported	Note	Site-led programmes (if regulation is identified as required) could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided. New site-led programmes may be considered through future Annual Plan or Long Term Plan processes.
78.38	Department of Conservation - David Newey	<p>Wilding conifers. This is a serious and expanding weed issue in Canterbury and even with the MPI national program funding a much larger control effort, more funding is required.</p> <p>Better identifying active exacerbators and seeking a contribution from them is fair will reduce the funding shortfall. It will also be an incentive to plant alternative species that do not cause spread in parts of the region vulnerable to wilding conifer invasion.</p> <p>Water is a significantly undervalued resource. Protection of Canterbury's water sensitive catchments from wilding conifer invasion maintains water yield and helps maintain water quality. Hydro benefits and benefits for</p>	<p>Support in part</p> <p>Cost allocation for wilding conifers should include active exacerbators and seek a fair contribution from them. Water users are a main beneficiary and a fair funding contribution should be sought.</p>	Note	<p>These matters have been previously considered in previous RPMS's and dismissed due to practical limitations in implementing such a proposal. For water users in particular, the correlation between water use and the benefits of wilding control is dependent on variables such as the levels of infestation and how the water is being used. For hydro-generators, in particular local government rates are problematic as a means of gathering revenue as the area of land owned by the generators is relatively small and not proportional to benefits derived from water use compared with other uses such as irrigation.</p> <p>Similarly, there are practical difficulties with obtaining financial contributions from land owners with problem species and the administrative costs of implementing this as a funding mechanism would be very high relative to the additional funds obtained. In short, it is not an efficient mechanism for obtaining</p>

		<p>irrigated land amount to 50% collectively. Seeking a contribution from water users is fair and their contribution would reduce the funding shortfall.</p> <p>Water abstractors are prepared to pay considerable amounts for new water abstraction projects which provides evidence that they would pay for protecting water that would be lost to them if wilding conifers established in their water catchments. These actions align with the wording in section 9.5</p>			<p>funding, hence the reliance on existing, broader rating mechanisms.</p>
90.11	Johnstone, Robert	<p>The funding formula [for gorse and broom] should be adjusted to provide more general rate contribution to inspections and farmer liaison</p>	<p>Amend the funding formula for gorse and broom to provide more general rate contribution to inspections and farmer liaison</p>	<p>Reject</p>	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis and don't recommend changes to the funding split.</p>
90.12	Johnstone, Robert	<p>Nassella tussock - the funding formula should be left where it is and has been for a very long time. Those properties who have nassella have a huge annual cost whihc they have to meet year after year and must be a great imposition for them. The proposed alteration to the funding formula as I understand it is not supportable the status quo should remain</p>	<p>Amend the funding formula for nassella tussock so the status quo remains</p>	<p>Reject</p>	<p>Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to the funding split. However, a review of the rating mechanism is recommended to occur during the 2018 Long Term Plan (LTP) review process. It would be valuable to consider the regional productive benefit for the inspection costs for pests. For example, reviewing whether pest district rating is appropriate where there is regional benefit and spread risk. If this reviewed under the LTP, it would be consulted on through that process and allow all affected parties to provide feedback.</p> <p>(Note: The funding formulae are set under the RPMP, not the LTP, and there will not be further chance to submit on this. However the LTP can look at options regarding where the "Occupier" portion is funded from, including consideration of whether it should come from individual land occupiers, targeted rates in a pest district or a wider targeted rate across the region.)</p>

90.13	Johnstone, Robert	<p>Rabbits - the introduction of RHD has had a huge beneficial impact across all rabbit prone regions in Canterbury. My understanding is that the effectiveness of the virus is lessening but another one has been identified and may well be introduced. My plea is to do everything in your power to encourage this introduction to hopefully give an enhanced level of rabbit control once again.</p> <p>The funding formula should be adjusted to provide for Council funded control activities on these small blocks (4ha) of which there must by now be somewhere near 9000 or more throughout the region. These small property owners haven't really got shooting as an option and probably can't or won't get involved with poisons. But many have a significant rabbit problem.</p>	Amend RPMP provisions to include a targeted rate on small blocks for rabbit control	Reject	The introduction of the new strain of the Calciavirus is out of scope for the RPMP, but staff are part of the National Group coordinating the introduction of this control. It is anticipated that the release of the new strain of the Calciavirus should reduce the levels of control required for rabbits, including on small blocks and council funded control should not be required.
90.14	Johnstone, Robert	<p>Old man's beard - No one questions the devastating impact this plant can have on both exotic and indigenous vegetation. But if the region is to have a policy it should be fair to all parties and implemented accordingly. the private land owners should not be hammered on the one hand while the Crown agencies in the riverbeds are allowed to escape enforcement and provide seed source for further contamination of private land . And what about OMB in residential city areas? Who monitors that?. And the local office ( Amberley) should not be able to arbitrarily draw a line down a road ,dissecting a property and then</p>	Amend the RPMP to set old man's beard control to be met 100% by the Council General Rate	Reject	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to the funding split. There are some site-led programmes for old man's beard, which address biodiversity impacts and these are recommended to be funded 100% by the regional community.

		<p>leave the adjacent (infected) riverbed out of contention.---plainly not fair. I submit that all OMB control should be funded by the Council General Rate. The Crown's good neighbour approach is a start but not nearly enough.</p>			
90.19	Johnstone, Robert	<p>Wallabies I support the continuation of the current policy of containment to those more southern geographical areas and to the level of numbers as has been established .. It would be a mistake to allow them to spread any further than their current range</p> <p>Funding Never forget that after the restructure of Local Government and the dissolution of the old Pest Boards all those Pest Board assets were sold . During the 1990's and early 2000's all the houses and depot assets in Canterbury were sold and that revenue went into the general Council pot (over \$3million) with none being specifically assigned to pest management per se . That in my view was wrong as those assets belonged to the rural ratepayers in the various Pest Districts . Therefore ,today, there should be recognition of that with greater funding coming from general rate.</p>	Amend the RPMP to assign greater funding to wallabies through the general rate	Reject	Staff support the assessment of beneficiaries and exacerbators undertaken in the Cost Benefit Analysis, and don't recommend changes to the funding split.