

Canterbury Regional Pest Management Plan – Written Evidence

Submitter : H. R. Turnbull, Chiltern Hills, 700 Reeces Road, Omihi

Date: 3 September 2017

Regarding : Nassella (PO16 p55, 6.4.16 p56, 6.4.17 p56)

I purchased Chiltern Hills in December 1987 so have farmed here for almost 30 years. I was brought up on a farm in Amberley and went to university. After graduating I worked overseas for several years before returning to New Zealand to start farming.

Chiltern Hills is a 770Ha hill country property that contained areas designated as 'nucleus areas' in the original stages of the nassella control program. In the time I have farmed Chiltern Hills I have noticed a very significant reduction in the number of nassella plants. The reduction has been due to two main factors;

- Removal of matagouri either by cultivation or spraying
- Grubbing in late October / early November when the plants are more visible and before the seed is viable

As can be seen in the three attached letters I have sent to Ecan, I have had ongoing issues with the way Ecan staff have enforced the current policy. The letters provide the evidence that early grubbing is not effective and that Ecan staff are not prepared to work with farmers who are making progress with nassella on their properties. For instance last year I received a Compliance Order in early October, then had two inspectors arrive to inspect on the first working day in November, even though Ecan was informed in writing and by phone that grubbing would not be completed until mid November. Another landowner who is normally late finishing grubbing had three inspectors arrive the same day (he passed). I also had two inspectors arrive after I had finished grubbing for the final compliance check. That was seven man days spent inspecting two properties when two would have sufficed, which is an exceedingly poor use of staff time and ratepayer money.

Ecan use the justification for downgrading nassella to sustained control from progressive containment due to the number of plants remaining static. Millions of dollars has been invested in controlling nassella over the years and countless thousands of manhours spent grubbing by landowners, their staff, contractors and NGO staff. No landowner at the RPMP review consultation meeting I attended suggested downgrading the status of nassella. Downgrading the status implies that Ecan are giving up on nassella and denigrates all the hard work done over the years. I would suggest that the reason the number plants is remaining static is due to the way Ecan enforces the current policy, especially by encouraging early grubbing / inspection. The smaller nassella plants only really start growing in late August early September and these plants then seed in late November. If you can't see the plants you can't grub them out.

Allowing an extra 2 weeks grubbing time on harder nassella prone country would enable more plants that may seed to be grubbed.

Hugh Turnbull

Attachments:

- 1) Letter 1 dated 26 October 2015 (3 pages)
- 2) Letter 2 dated 16 December 2015 (2 pages)
- 3) Letter 3 dated 24 October 2016 (2 pages)

LETTER 1 (p1/3)

Chiltern Hills

RD3

Amberley 7483

26 October 2015

ECAN

Amberley

Attn: Leanne Lye

RE: Nassella Tussock Compliance Inspections

Regarding your letter of 19 October 2015. You state that inspections will be carried out as soon as possible after 31 October whether control work has been completed or not, and if plants are found then a Notice of Direction will be issued. This is gross waste of ratepayer money and a very poor utilisation of Ecan staff time.

Due to my farming program it is not possible for me to complete grubbing to a standard I am happy with by the end of October. Lambing does not start on this property (and on some other hill country properties in North Canterbury) until mid September and some mobs later. Currently the earlier mobs are being tailed and the later mobs are still lambing. Due to the hilly nature of the property I do not disturb ewes over lambing, as going around the blocks (or walking through them grubbing nassella) results in mismothered lambs.

The recent nassella trials undertaken on the property proved that early grubbing (as recommended by Ecan) is a waste of time on this property. Interestingly one year Ecan staff had to come back twice one year to get one of the "early" grubbed trial blocks up a level that would pass inspection. Another year in early December I did a short beat through an "early" grubbed trial block to get a massive seeding nassella plant visible from the top of the face, and in the process grubbed over 60 plants including about 10 very big seeding plants. This was shortly after Ecan staff had been through the block doing a follow up grubbing, as I had commented to Ecan that numerous plants had remained after the "early" grubbing.

This year I monitored some nassella hot spots on arable country in August with no plants being visible. However on checking the same areas in the last few days ago there were small nassella plants visible that would be capable of seeding later in the year. These plants probably only started putting on a growth spurt after the rain in mid September.

LETTER 1 (p2/3)

I discovered in the initial years after purchasing this property 28 years ago, that early grubbing (prior to September) did not result in any progress being made with the nassella problem in the scrubby native blocks. The property had several “nucleus areas” from the 1960-70’s. It was only after that I started grubbing the native blocks in late October and early November, when the plants are more visible, that progress was made. Thousands of old nassella plants that had been secreted in the matagouri were grubbed as they were visible due the flowering stems poking out from the undergrowth. Many of these plants had passed numerous inspections and seeded for many years. If you can’t see the plants you can’t grub them out.

I have no issues with Ecan coming to inspect the property, in fact I welcome it as a fresh set of eyes looking out for plants. I do however have a problem with Ecan turning up on the 2nd of November to do an inspection when they have been told it is a waste of time as grubbing is still ongoing and won’t be completed for another 7-10 days. The staff duly turn up, do an inspection and write out a notice of direction then come back several weeks later to do another inspection. One year I even suggested the officer not bother turning up but just send out a notice of direction so they could go and do a more productive inspection on another property. However the officer arrived on the property and I told him where some nassella were not far from the road so he could go and see that nassella existed to justify writing out the Notice of Direction. However he insisted on doing a complete inspection of the property before doing the Notice of Direction. This was a complete waste of ratepayer funds and his time.

The property generally has no issues passing a final inspection. Last year was an exception and grubbing was not completed until later than planned, due to the contractor being a few days late arriving and extra time having to be spent to get the Ecan nassella trial blocks back up to a suitable standard.

I am also a member of the Kate Valley Landfill Community Liaison Group which meets about 4 times a year with the dump management and officers from the consent holders (Ecan and Hurunui District Council) to discuss any issues with the dump. An ongoing odour problem was being discussed at one meeting. When the Ecan consents person was asked why no formal action had been taken against the dump operators, the officer explained that Ecan tried to work through issues rather than taking direct action adding “a bit like they do when it come to nassella inspections”. The last comment was met with a great deal of derision from all the farming members of the group.

Every year I apply for an extension to allow grubbing to be completed after 31 October but they are all declined because I have failed the initial inspection in the 2 years prior, as the Ecan inspection staff insist on turning up very soon after 31 October, even when told grubbing is underway and should be completed in 7-14 days. I would much rather spend more time grubbing and attempt to do a thorough job than rush grubbing to be completed by 31 October.

Experiment 1 in the recent nassella trials (time of grubbing in spring) showed that no replacement of the number of nassella plants takes place until grubbing is undertaken after very late November / early December (Figure 1 in Final Report to Farmers on SFF Projects 07/077 and 11/095 – Saville and Bourdot, 30 September 2014). Therefore scientifically one should be making progress in the control

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of nassella as long as the plants are grubbed prior to very late November / early December. This has been proven to be true on this property where grubbing is typically completed by early November.

I have no issues within the underlying basis for the Regional Pest Management Strategy regarding nassella but believe some pragmatism should be exhibited by Ecan staff regarding enforcing the 31 October completion date on harder hill country properties in North Canterbury. If Ecan staff did a ring around early November they could establish on which properties grubbing was completed or still underway. On the properties where grubbing was still underway a mutually agreed inspection date could be arranged between the landowner and Ecan. The Ecan staff could then proceed with compliance inspections on properties that had completed grubbing. This approach would also improve relations between Ecan and affected landowners.

Yours sincerely

Hugh Turnbull

CC: David Bedford – Ecan (David please circulate to your fellow Commissioners)

: David Hyde – Nassella Community Liaison Group

LETTER 2 (p1/2)

Chiltern Hills

RD3

Amberley 7483

26 October 2015

ECAN

Amberley

Attn: Leanne Lye

RE: Nassella Tussock Compliance Inspections

Thank you for your letter of 30 October 2015 and the Inspection Advice (no.110330) dated 11 December 2015 signed by Lance Smith (received on 16 December 2015).

It was very generous of you to hold off your initial inspection until 9 November. This is the first time that I have received an extension, however it did not extend until mid November which was the date I said I would be finished by. The cynic in me thinks that had I not copied in an Ecan commissioner I would have been inspected on 2 November as usual.

At least when I was inspected on 9 November the officer only spent 2 hours on the property and hence only wasted half a day of ratepayers time (unless he spent the other half day back at the office writing out the Notice of Direction). I was informed by the officer that he was coming at 0900 so I waited around until about 0930 but he had still not arrived. The Inspection Advice states he turned up at 0954. Hence I wasted half a morning waiting for your staff member when I should have been out doing something productive, like grubbing nassella.

The aerial inspection was undertaken on 1 December, approximately 2 weeks after I had finished grubbing. The resulting Inspection Advice indicated compliance, with 'good control work in all areas inspected'. If this inspection had been the initial inspection there would have been no need to waste time and create stress by issuing a Notice of Direction against a property you had been repeatedly informed had not completed grubbing.

During a phone call with you I enquired how many hill country farmers had similar issues to me in not completing grubbing by 31 October and you replied a few. When questioned how many a few was you replied about 20%. This suggests to me that there is a major problem with the RPMS regarding timing. I, along with the majority of other farmers I have spoken to, have no issues with Ecan doing inspections once grubbing is completed, in fact I welcome them as a fresh set of eyes.

The major issue I have is Ecan insisting in doing an inspection and issuing Notices of Direction when they have been informed that grubbing has not been completed, especially on harder hill country properties. This is a waste of Ecan staff time and very poor use of ratepayer funds. When the Ecan

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staff member rang about the aerial inspection they said they were too busy to undertake an inspection on foot, yet a month earlier they had time to inspect a property that Ecan had been informed was still being grubbed.

If a bit of pragmatism was exhibited by the more senior biosecurity officers regarding scheduling of nassella inspections I believe relations between Ecan and farmers would significantly improve. This would also make the jobs of the inspection staff considerably less stressful and enable more positive interaction with the farmers.

Yours sincerely

Hugh Turnbull

CC: David Bedford, Tom Lambie – Ecan (David please circulate to your fellow Commissioners)

: David Hyde – Nassella Community Liaison Group

LETTER 3 (p1/2)

Chiltern Hills

RD 3

Amberley 7483

24 October 2016

ECAN

200 Tuam St

Christchurch

Attn: Ecan Councillors

Cc: Ecan Amberley

: Hurunui Nassella Tussock Pest Management Liaison Committee (c/o David Hyde)

RE: Nassella Tussock Compliance Order

In early October I received a Compliance Order dated 5 September 2016 for nassella tussock, signed by Leanne Lye, Biosecurity Team Leader, Amberley.

Following a meeting with Biosecurity Team Leader Leanne Lye and the chairperson of the Hurunui Nassella Tussock Pest Management Liaison Committee (NTPMLC), David Hyde, on Wednesday 19 October I have serious misgivings about Ecan issuing Compliance Orders for nassella tussock. Apparently about 12 of the Compliance Orders have been issued this year, with 8-9 issued to landowners who regularly fail to comply with the Rule 6.2.5, 31 October cut off date for grubbing, due to their farm management programs but generally to a good grubbing job, and the remaining 3-4 who apparently make limited efforts.

The objective of the Regional Pest Management Plan (RPMP) for nassella is "To progressively reduce plant numbers over time". However Ecan monitoring data indicate that the plant numbers over the last 16 years fluctuates, but with an average of approximately 18 plants per hectare. I know on this property the number of plants grubbed is overall still reducing significantly, but with year on year variations. Hence I am meeting the objectives of the RPMP, however I fall foul of Ecan every year because I do not complete grubbing by 31 October due our farming schedule (see attached letter). I am declined extensions because I have not complied for the previous 2 years.

On this property, and I expect on the majority of North Canterbury hill country properties, nassella plants do not start putting on a visible growth spurt until mid to late August when they appear to become less palatable to stock. Prior to this the plants are either semi dormant or are chewed down by stock. During our meeting I produced a small nassella plant about 5cm high that had been grubbed the previous day and asked David Hyde if he thought it would seed this year. His reply was

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“highly likely”. When asked if he thought the plant would have been big enough to be seen to be grubbed in August he replied “highly unlikely”. Leanne Lye made no comment.

Ecan appears to have ignored the results SFF project (Nassella Tussock- An integrated management approach, by Dave Saville and Graeme Bourdot, 2014) that showed that “spring grubbing was significantly more effective than autumn grubbing at reducing late spring density”. On our property the final counts of nassella plants as a % of the initial count after 6 years for the 3 autumn grubbed blocks were 50.4%, 46.9% and 50.4%, whereas for the 3 spring grubbed blocks the final counts were 13.7%, 15.9% and 15.3% of the initial counts. This proves to me that early grubbing on native hill country is a waste of time, money and effort, as you would have to go back and regrab all the early grubbed country.

Ecan states the changes to the compliance inspections were supported by NTPMLC, however my understanding the proposed changes were presented at a meeting, and the members did not have the chance to go away and fully consider all the implications of the changes. I do not know what the cost of issuing these compliance orders was but Leanne implied a considerable amount of Ecan staff/commissioner/lawyer time was involved in producing the orders.

Issuing heavy handed compliance orders with a threat of court action to 12 properties out of about 200 properties is not going to significantly reduce the average number of nassella plants per hectare in the Hurunui, which is what the RPMP is trying to accomplish, when on at least 2 of these properties the plant numbers are steadily reducing. In my opinion, and supported by science, I suspect the bulk of the problem is with some/many of the other 188 properties, especially those that grub early and are inspected early, i.e. before mid to late August. I am also disappointed that one reason given for the changes to the way compliance inspections are being undertaken was ease staff workload by inspecting early (from 1 July) when it has been shown early grubbing does not obtain as good a result as later spring grubbing.

I realise Ecan only has limited staff, but by showing a bit more pragmatism and engaging with farmers in a more positive way may help Ecan meet the objective of the RPMP for nassella. Compliance orders produced early (mine was dated 5 September but not received until early October), where you are prejudged guilty of not meeting the objectives of RPMP before the Rule 6.2.5 date, is not a good use of rate payers money or Ecan staff time and does nothing for the state of mind of those farmers who receive them. I therefore request that the Compliance order be cancelled.

I have attached a letter dated 26 October 2015 written to Ecan that gives more background to nassella on this property.

Yours sincerely,

Hugh Turnbull

Att'd: Letter addressed to Leanne Lye, Ecan, Amberley dated 26 October 2015 re Nassella Tussock Compliance Inspections