

08 September 2017

Panel Chair (Cr. Tom Lambie)  
Environment Canterbury Regional Council  
PO Box 345  
Christchurch 8140

**By email**

Dear Councillor Lambie

**Request to table statement in support of KiwiRail's submission to the Proposed Canterbury Regional Pest Management Plan 2017-2037**

Thank you for the opportunity to submit on the Proposed Pest Management Plan 2017-2037. I would like to request that KiwiRail be granted leave to not attend the hearing on Monday 11<sup>th</sup> and instead table the attached statement. The statement comments briefly on the Staff Report recommendations.

Please contact me if you have any further queries.

Yours sincerely




Pam Butler, Senior RMA Advisor

Address for service:  
Pam Butler, RMA Advisor  
P O Box 593, Wellington 6140  
Ph: (04) 498 2127  
Email: [Pamela.Butler@kiwirail.co.nz](mailto:Pamela.Butler@kiwirail.co.nz)

**Attachment 1: KiwiRail statement in support of submission**

*Leave granted  
and right to seek  
any clarification  
reserved.*



TABLED

---

**STATEMENT BY KIWIRAIL HOLDINGS LIMITED  
TO ENVIRONMENT CANTURBURY  
PROPOSED REGIONAL PEST MANAGEMENT PLAN HEARINGS  
11 SEPTEMBER 2017**

---

## Introduction

1. My name is Pam Butler. I am a Senior Resource Management Act (RMA) Advisor at KiwiRail.
2. I apologise that I can't attend today's hearing. This statement has been prepared on behalf of KiwiRail as a transport network utility operator and a landowner with extensive corridor landholdings within Canterbury.

## Clause 3.3.5: Rail

3. KiwiRail has submitted in support of clause 3.3.5 Rail, as it provides the opportunity for discussions to take place about how KiwiRail will contribute towards achieving the Plan's objectives. KiwiRail supports the Staff Report recommendation that the clause be retained.
4. As stated in its submission, KiwiRail considers it is reasonable to develop cost and resource-effective regulatory pest management responses based on its unique nature and operation.

## 8.3 Power to issue exemptions to plan rules

5. The Staff Report doesn't support changing Clause 8.3 to recognise that an agreed alternative management plan could be used as an alternative compliance tool. The Officer's comments support agreeing an approach for achieving pest management outcomes with KiwiRail, and this is supported.
6. KiwiRail is bound by all the Regional Pest Plan rules. This creates a distinction between it, and other large Crown landholders which are bound only by 'good neighbour' rules. There are unusual practical challenges associated with managing pests along the national rail corridor. This necessitates a flexible and reasonable approach about how the new Plan's objectives will be addressed in terms of extent, timing and method.

7. In view of this unique situation, KiwiRail considers that a negotiated management approach is the most effective way for both it and the Council to identify priorities to direct resources most reasonable and effectively. This would support KiwiRail in building towards achieving the Regional Pest Management Plan outcomes.
8. Our contractors Treescape currently meet with council staff about corridor pest issues. They then programme their pest plant control activities based on feedback. This approach covers both site and progressive control and generally works well.
9. KiwiRail accepts the Staff Report recommendation about Clause 8.3. KiwiRail trusts that it will be canvassed, using the approach set out in Clause 3.3.5, and its unique circumstances considered on the issue of compliance, should this arise.



Pam Butler

Senior RMA Advisor

KiwiRail Holdings Limited

06 September 2017