

HURUNUI DISTRICT COUNCIL

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SUMMARY FOR ORAL SUBMISSION

Appearing before the Hearing Panel considering the

Proposal for the Canterbury Regional Pest Management Plan 2017-2037

Appearing for HDC: Winton Dalley, Mayor, Hurunui District Council

Date: Tuesday 19 September at 1.30pm

Venue: Rugby Club Rooms, Amberley Domain

Opening comments

1. Thank you for the opportunity to speak to our submission.
2. The issues covered in our submission related to the Good Neighbour Rules and funding.
3. HDC supports the Good Neighbour Rules and has no further comment on this matter.
4. HDC opposes the proposed funding splits for Nassella tussock and Chilean needle grass. This issue is expanded on in this oral submission.

Funding – Chilean needle grass and Nassella tussock

5. In relation to funding, HDC opposed the increased targeted pest management rate (occupier) for both Nassella tussock and Chilean Needle Grass. HDC favours the 50/50 inspection split being maintained for both pests.
6. HDC wishes to take the opportunity to reiterate that as both of these pests are present in Hurunui District, with Nassella tussock being particularly prevalent, the proposed funding changes for inspection rates will have financial implications for Hurunui District ratepayers.
7. In relation to Officer comments on Chilean needle grass:
 - The “Staff Recommendations Report” (page 15) notes that comments were received related to Chilean needle grass funding but does not make any recommendations.
 - The “Summary of Submissions and Staff Recommendations Report” (page 232) recommends that the funding for the inspection rate for Chilean needle grass is changed to the same proposed funding split as for Nassella tussock, this being an occupier rate of 75% and regional rate of 25% (as opposed to the proposed 100% occupier rate / 0% regional rate split).

8. In response to this, HDC considers the change to a 75/25 split is a change in the right direction, however, considers that retention of a 50/50 split would more accurately reflect the benefits to land owners and the wider community, and maintains this position.
9. In relation to Officer comments on Nassella tussock:
 - The “Staff Recommendations Report” (pages 14-15) does not recommend accepting the request to retain the 50/50 split for Nassella tussock inspection funding, and states that: *The benefits of inspection accrue more widely but remain primarily with rural occupiers in areas prone to Nassella.*
 - In the “Summary of Submissions and Staff Recommendations Report” (page 232) it is explained that: *The 25-75 funding formulae are set under the Regional Pest Management Plan, 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.*
10. In response to this, HDC agrees that the benefits of inspection accrue more widely than the site itself, however HDC considers that this is the overarching benefit from inspections of, and subsequent control of, both Nassella tussock and Chilean needle grass on private land. HDC still considers that retention of the current 50/50 split for Nassella tussock would more accurately reflect the benefits to land owners and the wider community however accepts that Officers have advised that there is no further chance to submit on this.

Concern about the general direction of the strategy

11. Paragraph 9 of HDC’s submission commented that HDC has concern about the general direction of the strategy and the financial implications it would impose on land owners.
12. The “Summary of Submissions and Staff Recommendations Report” (page 34) states that: *Staff would find benefit in discussion during the hearing to understand the reasons for concern regarding the general direction of the strategy.*
13. In response to this, it is clarified that the general concern HDC has relates to the financial implications for land owners (as discussed above). HDC considers that the general direction of placing more onus on land owners for inspection costs does not recognise the wider community value of pest control.
14. HDC strongly contends the long held principles that the spread and infestation of these pests have widespread detrimental financial implications across a wide cross section of the regional economy due to loss of productivity. These principles are as important today as they have ever been. Agriculture is still a huge part of the Canterbury regional economy, and Canterbury has a vast area of farmland that is particularly vulnerable to the establishment and spread of Nassella Tussock and Chilean needle grass.
15. Canterbury also has large areas of public conservation land (including national parks) that are vulnerable to these pests. These pests would be tragically destructive if they became rampant in those areas.
16. For these reasons, HDC considers that sharing the cost of control is appropriate and in the best interest of the whole community.

Onerous costs on landowners is counterproductive to conscientious control

17. HDC experienced the onerous costs of pest control on landowners with the discovery of Chilean needle grass in the Hurunui District in 2009.
18. At my personal recommendation to the Chair of Canterbury Regional Council at the time, every assistance and encouragement was given to landowners to identify and report infestations. Other assistance was also given by industry bodies to ensure that reporting a newly discovered infestation did not destroy a farm's viability.
19. The temptation to hide such an extremely destructive and hard to find pest was real, however the approach taken at that time means that – today – it is still possible to eradicate Chilean needle grass in the Hurunui District.
20. HDC considers that a change to the funding policy could risk putting eradication in jeopardy for the above reasons. The risk to public conservation land is also a risk not worth taking.
21. HDC strongly urges Canterbury Regional Council to retain the current funding model of a 50/50 split for the targeted pest management rate (occupier) for both Nassella tussock and Chilean Needle Grass. HDC considers this is equitable and appropriate and will ensure the investment to date is not lost. HDC also considers this will ensure a fair incentive remains in place for landowners who find themselves in the position of having these pests on their property, and will incentivise landowners to continue with conscientious control and eradication.
22. HDC considers that the control and eradication of these pests is a responsibility wider than the currently affected landowners.

Concluding comments:

23. HDC reiterates that it opposes the increased targeted pest management rate (occupier) for both Nassella tussock and Chilean Needle Grass. HDC favours the 50/50 inspection split being maintained for both pests.

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