

Environment Canterbury
Proposed Canterbury Regional Pest Management Plan
Hearing Panel
Attention: Councillor Tom Lambie (Chair)


20 September 2017

By email: c/o Lochiel.McKellar@ecan.govt.nz

**RE: PROPOSED CANTERBURY REGIONAL PEST MANAGEMENT PLAN
NZDF LETTER TO BE TABLED AT HEARING**

Introduction

1. NZDF has military interests throughout New Zealand. NZDF currently has numerous facilities within the Canterbury region, the most relevant to the Proposed Canterbury Regional Pest Management Plan ('the Proposed Plan') being Burnham Military Camp, RNZAF Weedons, West Melton Range, Glentunnel Depot, and Tekapo Camp and Military Training Area.
2. I am employed by New Zealand Defence Force (NZDF) within the Defence Estate and Infrastructure Group, as a Senior Environmental Officer specialising in Ecology. My role is national and "tri-service" which means I am responsible for management of mainly Biodiversity and Biosecurity environmental projects and issues associated with the activities of Army, Navy and Air Force throughout New Zealand.
3. NZDF is currently carrying out Pest Management Programmes in the following areas within the Canterbury region:
 - a) Burnham Military Camp and close Training Areas – main programmes: Broom and Gorse, Wilding Conifer and Eucalyptus, Rabbit and Hare.
 - b) RNZAF Weedons - main programmes: Broom and Gorse, Rabbit and Hare.
 - c) West Melton Range - main programmes: Broom and Gorse, Nasella Tussock, Wilding Conifer and Eucalyptus, Rabbit and Hare.
 - d) Glentunnel Depot - main programmes: Broom and Gorse

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- e) Tekapo Camp and Military Training Area - main programmes: Broom and Gorse, Wilding Conifer, Willow, Rabbit, Hare, Wallaby and other general mammalian browsers.
4. NZDF is responsible for controlling statutory pests at all of these sites. The Proposed Plan will be a major determinant of what pest species NZDF controls at these sites in the future and the methods of control, and is consequently a major determinant in the cost of this control to NZDF.
 5. NZDF has made submissions on the Proposed Plan and has reviewed the Canterbury Regional Council's Staff Report regarding the Proposed Plan. NZDF's position in respect of its submission points and the Staff Report recommendations that it wishes to address further is set out below. NZDF has opted not to attend the hearing in person, and requests that in lieu of attendance this letter be tabled for the Hearing Panel's consideration.
 6. NZDF's submission on the Proposed Plan, and response to the recommendations set out in the Staff Report is from the perspective of NZDF as an occupier and manager of land and associated values that it wishes to protect. The statements and comments made on the pest animal and plant programmes outlined in the RPMP reflect the perspective, observations and experience of NZDF's land management staff in the region.

Submission point 3 and Staff Report recommendation 85.3

7. NZDF seeks that up-stream properties should be required to control broom and gorse around the margins of waterways that cross boundaries as well as along boundary fence-lines. The rationale is:
8. Water transports the hard and heavy seeds of broom and gorse and is a significant pathway of spread from existing infestations and between properties. This is evident in the lower reaches of river systems in Canterbury.
9. The hill and high country rules, or their equivalent, have been in place for some time yet this problem persists. A change in management approach is therefore needed. Seed in the soil being transferred to waterways is only a problem where there is active erosion. The majority of the seed being currently transported is from live plants depositing seed on the ground surface or directly into water. The problem is one of externality, as downstream users pay for upstream exacerbators. This is neither efficient nor equitable. Further analysis and consultation regarding this problem would therefore be justified.

Submission point 2 and Staff Report recommendation 85.2

10. NZDF seeks clarification or definition of 'reasonable steps'. NZDF acknowledges Council's recommendation that 'reasonable steps' should be

assessed on a case-by-case basis and that it may be restrictive to include details in the rule.

11. However, some guidance is required otherwise the question will need to be answered in legal precedent which is expensive and can produce unforeseen outcomes. Perhaps a useful guide may be to define the outcomes expected from taking reasonable steps. In this way the approach taken is not constrained, but benefits from achieving the desired outcomes can be obtained.

Submission point 7 and Staff Report recommendation 85.7

12. The Staff Report notes that rules and actions under the Regional Pest Management Strategy (RPMS) did not control the wallaby population – in fact the distribution and density became worse. The rules and actions under the proposed Plan appear to be the same as those from the RPMS and are therefore likely to result in the same outcomes. Council may therefore need to change its strategy if it seeks to manage the wallaby population and therefore the rules will need to change to support the strategy.

Submission point 7 and Staff Report recommendation 85.8

13. NZDF proposed that the Bennett's Wallaby programme be split into two programmes: sustained control within the containment area and a Progressive Containment in the buffer zone. For those newly established populations (such as in the Mt Cook area) there should be strong rules in place to maximise control efforts to ensure they do not spread further.
14. Council's recommendation is that the programme will be undertaken outside of the Proposed Plan, without the need for specific rules and does not need to be detailed in the Proposed Plan.
15. NZDF considers that since this is a Management Plan, it is preferable to at least include descriptions of all the types of actions that will be undertaken. This is essential for public understanding.

Conclusion

16. NZDF is supportive of the Proposed Plan, but requests that the Hearings Panel takes into consideration the matters set out above. NZDF wishes to contribute to the achievement of the best overall management of pests in the Canterbury region (and throughout New Zealand) and would welcome the opportunity to be involved in any on-going consultation regarding the Proposed Plan.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Stephen Phillipson', with a long, sweeping underline.

Stephen Phillipson

Senior Environmental Officer (Ecology)
Defence Estate and Infrastructure