Lochiel McKellar

From: Neil Walkinshaw <neil@newenvironmental.co.nz>
Sent: Monday, 20 November 2017 3:27 PM
To: Lochiel McKellar
Subject: RE: Canterbury Regional Pest Management Plan - revised Interim Draft Plan and Panel's Sixth Minute

Hi Lochiel,

Thank you for your assistance with these matters and the opportunity to make further submissions, it is greatly appreciated. As discussed, WELRA would like to make the following further submissions on the Interim Draft Plan (10 November 2017) document:

- WELRA would like to offer congratulations to the Hearing Panel and ECan staff on the production of the Interim Draft Plan. It is great to see the incorporation of the many excellent submissions in this evolving document. WELRA would like to thank the Panel and ECan for the time and consideration given to WELRA's submission.
- Overall, WELRA fully supports the proposed changes to the wilding conifer provisions of the proposed Regional Pest Management Plan, as outlined in the Interim Draft Plan (10 November 2017) document.
- However WELRA would like to raise one further point for consideration by the Panel. This relates to the use of the phrase "*on receipt of written direction from an Authorised person*" that is written into Rule 6.3.2 and Rule 6.3.3. This means these rules are only triggered if an Authorised person produces a written document for an occupier. If this written direction does not happen, then these rules will have no effect at all. To be effective on delivering on the proposed Plan objectives, WELRA would submit that both these rules would be more effective if the requirement for written direction to undertake the control work was removed.

  WELRA would propose the wording of Rule 6.3.1 would achieve a more effective outcome in the battle against wilding conifers. The wording in Rule 6.3.1 places the onus on the land occupier to maintain the pre-coning state – no written direction required. This is a more passive approach as every occupier is equally required to achieve the same outcome on their land. ECan staff can then focus on educating and assisting occupiers achieve these collective outcomes rather than providing written direction.
  Requiring written instruction to undertake required control works can often be interpreted as a more confrontational process. If this approach is periodically required because of occupier inaction, then the provisions of the Biosecurity Act can be applied for being in breach of the more passive version of the rule.

  By removing the written direction component of Rule 6.3.2 and 6.3.3, ECan will be able to more effectively achieve its progressive containment approach to management of wilding conifers. Once land is cleared of wilding conifers, the series of Rules 6.3.1 – 6.3.3 would require occupiers to maintain that pre-coning state without direct intervention from ECan. This will help reduce overall control costs for the region over the long term, more effectively maintain the line against the spread, and provide greater protection to public investment into control works.

  Due to the broader scope of Rule 6.3.4, WELRA would support the retention of the phrase "*on receipt of written direction from an Authorised person*" in this rule. WELRA would envision Rule 6.3.4 being used on rare occasions to target coning trees that are causing significant spread issues. ECan staff should retain direct oversight over the implementation of this rule.

I can rant on in a lot more detail about the whys and the whys not if it would help, but I don't have any further 'hard evidence' per say. Happy to rant down the phone to people if they want to chat about it.

Kind regards,
Neil Walkinshaw
(022 047 3988)

From: Lochiel McKellar [mailto:Lochiel.McKellar@ecan.govt.nz]
Sent: Friday, 10 November 2017 4:16 PM
To: Lochiel McKellar <Lochiel.McKellar@ecan.govt.nz>
Subject: Canterbury Regional Pest Management Plan - revised Interim Draft Plan and Panel's Sixth Minute

Good afternoon,

Please find attached a copy of Minute 6 from the Canterbury Regional Pest Management Plan Hearing Panel. This accompanies the Council's revised Interim Draft Plan. A copy of this is also attached but please note that due to the size of the full document this version has had the maps removed. To see the full version including maps please go to www.ecan.govt.nz/pests and look under 'Council Documents' to the Interim Draft dated 10 November 2017.

You are invited to provide written comments on this revised Interim Draft on technical and workability matters. Instructions on how to submit comments were provided in the Panel's Minute 5. This is available at www.ecan.govt.nz/pests under 'Panel Documents'.

As always, if you have any comments questions or concerns please do not hesitate to contact me.

Kind regards,
Lochiel McKellar

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