
From: Wendy Osborne <wosborne@doc.govt.nz>
Sent: Monday, 26 March 2018 4:18 p.m.
To: Mailroom Mailbox
Cc: David Agnew; Alex Foulkes; Rachel Brown
Subject: LTP Submission
Attachments: Submission on Environment Canterbury Long Term Plan - DOC-5444125.pdf

Kia ora

Please find attached a submission by the Director-General of Conservation in respect to the Environment Canterbury Long-Term Plan 2018-2028

The Department of Conservation wishes to be heard in support of this submission

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Ngā mihi

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DOC-5444125
21 March 2018

Long Term Plan
Environment Canterbury
PO Box 345,
Christchurch 8140

Dear Sir/Madam,

Submission on Environment Canterbury Long-Term Plan 2018-2028

Please find enclosed a submission by the Director-General of Conservation in respect of the above plan.

Yours sincerely



Andrew Roberts
Director Operations
Eastern South Island
For Director General

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LOCAL GOVERNMENT ACT 2002

To: Environment Canterbury

Submission on: Long-Term Plan 2018-2028

Name: Lou Sanson, Director General of Conservation

Address: Private Bag 4715
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Christchurch 8140

Statement of Submission by the Director General of Conservation

Pursuant to S83 of the Local Government Act 2002, I Andrew Roberts, Director Operations of the Eastern South Island Region of the Department of Conservation on behalf of the Director General of Conservation, make the following submission on the above draft plan.

1. The Department congratulates, and supports, Environment Canterbury on prioritising biodiversity protection and support the intended step change in effort to achieve this. Specifically, we encourage ECAN to implement the following:
 - a) A long-term commitment to supporting a community-driven partnership approach to all pest control work on Banks Peninsula realised through the Pest Free Banks Peninsula and Port Hills Partnership (PFBPP).
 - b) Financial support of a minimum of \$50k in year one available to the PFBPP to develop an over-arching strategy for Pest Free Banks Peninsula & collaborative operational work programme.
 - c) A sustainable revenue stream to fund the expanded pest control work programme comprising a general rate allocation and targeted rate. We suggest:
 - 50% contribution from the general rate take, recognising the public good provided by Pest Free Banks Peninsula to the region.
 - 50% contribution from the expansion of the current Banks Peninsula Community Initiative Programme to include all properties in the entire Banks Peninsula Ecological Region, and the targeting of more pest species.
 - d) A commitment to all Environment Canterbury pest control policy decisions and operational work being in alignment with the PFBPP over-arching strategy and work programme.
 - e) An increase in funding to \$40k in year one, to support the goals of the ongoing Goat Eradication Project.
 - f) Continued focus on weed control around Te Waihora,
 - g) Continued support on research and conservation measures for bittern/matuku (*Botaurus poiciloptilus*) and a review of the Te Waihora lake opening process.

- h) Enhanced management of freshwater biodiversity across Canterbury.
 - i) Enhanced management of braided river systems.
2. The Department supports the 2050 Ecological Vision for Banks Peninsula (including the Port Hills).
- a) In 2017, the Banks Peninsula/Te Pātaka o Rākaihautū (including the Port Hills) Ecological Vision 2050 was launched by the Banks Peninsula Conservation Trust. A range of organisations and agencies (including Environment Canterbury and the Banks Peninsula community) support the eight Ecological Goals set out in this Vision. The eight Ecological Goals are aspirational but achievable, and are being used to guide conservation management work to result in a substantial improvement in the state of indigenous biodiversity on Banks Peninsula/Te Pātaka o Rākaihautū by 2050. The Ecological Goals build on and seek to implement Environment Canterbury's Regional Biodiversity Strategy (2008), the Christchurch City Council's Biodiversity Strategy 2008 – 2035, the Mahaanui Iwi Management Plan 2013, and the Banks Peninsula Zone Implementation Plan (2013).
 - b) All eight Ecological Goals are interrelated. Goal 8 of the Ecological Vision is that Banks Peninsula/Te Pātaka o Rākaihautū is effectively free of pest animals. The 'Predator Free New Zealand 2050' project announced by the Government in 2016 has the ambitious goal of trying to remove possums, rodents and mustelids progressively from large areas of mainland New Zealand. Banks Peninsula/Te Pātaka o Rākaihautū is the largest true Peninsula in New Zealand (ca. 100,000 ha) and could be one of the first large areas of New Zealand to become effectively free of these pest predators. Other introduced mammals are also key biodiversity predators (both as herbivores and carnivores) and in the case of Banks Peninsula/Te Pātaka o Rākaihautū include feral deer (red and fallow), goats, pigs, rabbits, hares, feral cats and hedgehogs.
 - c) 'Effectively free of pest animals' means that all the pest animals listed above have been reduced to numbers that do not threaten biodiversity values. This is a pragmatic definition and accepts that while it may be possible to eliminate some pest animal species from Banks Peninsula (e.g. goats or deer), it may not be possible to eliminate them all (e.g. rodents). The intent is to reduce all pest animals to zero, or as close to zero, as possible across Banks Peninsula.
 - d) The removal of pest animals from Banks Peninsula will ensure indigenous species become more abundant and widespread across Banks Peninsula and into Christchurch City. This includes the common species that characterise Banks Peninsula today (birds, invertebrates, lizards), as well as currently rare or endemic species (e.g. penguins, falcon, titi, jewelled gecko, ruru, long-tail bats, lamprey, fragrant tree daisy, Akaroa daisy). Success will be demonstrated by robust scientific evidence that shows species are increasing in abundance and diversity, as well as anecdotal evidence, such as bird song, reported by the community.
 - e) To achieve Goal 8 of the Ecological Vision, the Banks Peninsula Conservation Trust invited representatives from a range of organisations to form the Pest Free Banks Peninsula Working Group.

3. The Department supports Environment Canterbury's initiatives to support the Pest Free Banks Peninsula initiatives and the Port Hills Partnership
 - a) The Pest Free Banks Peninsula Working Group has been established as a collaborative partnership between Banks Peninsula Conservation Trust, Christchurch City Council, Department of Conservation, Environment Canterbury, Koukourarata Runanga, Rod Donald Banks Peninsula Trust, and the Summit Road Society. The group is currently in the process of formalising their relationship through a MoU and will become known as the Pest Free Banks Peninsula and Port Hills Partnership. Membership to this Partnership will also include Selwyn District Council and be open to a wide range of community groups, schools, and businesses.
 - b) Significant work on pest control is already being undertaken by members of this collaboration and long-standing community predator control efforts are undertaken by groups and landowners across Banks Peninsula. The Banks Peninsula community has a track record for community-driven leadership which brings together landowner and multi-agency collaborations to achieve conservation outcomes e.g. the Goat Eradication Group and Wildside Project.
 - c) The PFBP Working Group/PFBPP believes that this partnership model that emphasises a community-driven approach with agency support is the most effective way to achieve the Pest Free vision.

4. The Department supports the increased level of service for both biodiversity and biosecurity contained in Environment Canterbury's draft long-term plan. This proposed increase in effort and focus aligns with other initiatives in the Environment Canterbury Regional Pest Plan, and also with community Predator Free 2050 initiatives.
 - a) In addition to helping develop landscape scale predator free areas such as Banks Peninsula/Te Pātaka o Rākaihautū predator free area the Department is also interested working with Environment Canterbury and other interested parties to develop a network of predator free areas in Canterbury. These projects include in North Canterbury restoration projects at Lords Bush, Lottery Bush, Ashley Gorge and the Chatterton River as well urban predator free areas which are being explored such as Predator Free Hanmer and Predator Free Arthur's Pass.

5. The Department supports the additional funding which is required to maintain cleared areas of wilding conifers to be funded by targeted rates, central government and general rates.
 - a) The Department has been working closely with the Ministry of Primary Industries and private landowners to clear areas of wilding conifers across North Canterbury and welcomes Environment Canterbury's commitment to develop additional funding in this area. The Department is committed to the objective to *'(c)ontribute to achieving zero-density of wilding trees within priority ecosystem units and areas of Outstanding Natural Features and Landscapes within the high country, using sustained control'* and will coordinate with Environment Canterbury and others to utilise emerging technologies to undertake this in an efficient and cost-effective manner.

- b) The Department will continue to work with Environment Canterbury, Waimakariri Ecological and Landscape Restoration Alliance (WELRA) and other groups to coordinate efforts to ensure long term removal of wilding conifers in North Canterbury and regionally have set a target of '*(s)ustained control of wilding trees within the high country in accordance with the New Zealand Wilding Conifer Management Strategy 2015–2030.*¹' by 2026. Effective and ongoing wilding conifer control in the short term can result in a major saving in future long term wilding conifer control.
6. The Department supports Environment Canterbury initiatives for the feral goat eradication on Banks Peninsula, however we suggest an increased commitment of \$40k funding allocation in Year One of the Long-Term Plan would better support achievement of goals for the Goat Eradication Project.
- a) Feral goats pose one of the most significant threats to biodiversity on Banks Peninsula. Over the past decade more than 5000 feral goats have been removed as part of the Goat Eradication Project with in excess of \$300,000 being invested by project partners to date. However, five goat 'hot spots' still remain. The Goat Eradication Group are confident that eradication can be achieved over the next five years with further investment from the partners. Unless this is done, the community risks losing the benefits of the work done to date as well as having to continue to have to spend money on goat control. The Rod Donald Banks Peninsula Trust has joined the group as an investment partner, but their support is contingent on additional funding being made available from agencies to ensure the ultimate success of the project. To this end, the Goat Eradication Group/PFBPP will also be seeking a comparative level of funding support from CCC and DOC. If successful, this additional funding will allow the Goat Eradication Group to make the step change in effort that Environment Canterbury is seeking to restore biodiversity on Banks Peninsula.
 - b) We congratulate Environment Canterbury on their recognition of feral goats as a pest on Banks Peninsula in the recently released Regional Pest Management Plan and encourage the matching of this policy decision with an increased funding allocation of \$40,000 in year one of the Long-Term Plan.
7. The Department supports Environment Canterbury initiatives that support the Pest Free Banks Peninsula initiatives and the Port Hills Partnership.
- a) The Department believes that achieving the Pest Free Vision requires buy-in from the communities and landowners who will be required to contribute to, and benefit from, the realisation of the Vision. A partnership model that emphasises a community-led approach with strong agency support is considered the most appropriate way to achieve the level of step change the Council identifies in the draft Long-Term Plan. To achieve this, we seek Environment Canterbury's long-term commitment to supporting a community-driven partnership approach to all pest control work on Banks Peninsula realised through the Pest Free Banks Peninsula and Port Hills Partnership.
 - b) Success will require that all members of the Partnership are committed to implementing an over-arching strategy for Pest Free 2050 and a collaborative

¹ Canterbury (Waitaha) Conservation Management Strategy 2016, p33

work programme. We welcome Environment Canterbury's support for the development of this work with a \$50,000 funding allocation to PFBPP in year one.

8. The Department supports the role of Pest Liaison Committees and seeks Environment Canterbury to consider strategic alignment with the PFBPP over-arching strategy, especially in relation to Banks Peninsula. It is considered critical that agencies and organisations examine existing pest related functions and decision-making bodies to ensure strategic alignment.
9. The Department supports the proposed Revenue and Financing Policy in the draft Long-Term Plan in relation to expanding the rating programme to cover all of the Banks Peninsula for pest control.
 - a) Realising the Pest Free Banks Peninsula Vision and a step change in biodiversity protection will require a collaborative strategy and work programme that is underpinned by a sustainable revenue stream. We seek that Environment Canterbury commits to a significant funding allocation from year two onwards in the Long-Term Plan, comprised of a general rate allocation (50%) and a targeted rate (50%).
 - b) Pest control is of national biodiversity importance and achieving Pest Free Banks Peninsula provides a public good for the whole region. In principle, we believe biodiversity protection should be funded entirely from general rates. However, we recognise that general rate funding may be constrained and a pragmatic solution to extend the available funding to support the Pest Free Vision is a combination of general rates and a targeted rate. We consider it appropriate that a contribution from the general rate take makes up 50% of the funding allocated to the PFBPP work programme.
 - c) The Banks Peninsula community has a history of undertaking pest control work to protect and enhance biodiversity. The Banks Peninsula Community Initiative Programme (CIP) for possums is an excellent example of community-led/agency supported pest control work. We consider that expanding the existing level of rating for the CIP to cover additional pest species and including all households from the entire Banks Peninsula Ecological Region (which includes the Port Hills) would be well received by a community that is motivated to do more for biodiversity protection.
10. The Department supports initiatives for Environment Canterbury to provide Regional Leadership.
 - a) The Department requests that Environment Canterbury commits to the collaborative community-led/agency supported model described above and in doing so: provides PFBPP financial and administrative support to develop the over-arching strategy and collaborative work programme; and ensures that all internal Environment Canterbury policy and strategies regarding pest control on Banks Peninsula are aligned to this collaborative approach.
11. The Department supports the continued focus on weeds, and especially willow control (*Salix spp*), around Te Waihora.

- a) DOC and Environment Canterbury have been working in Partnership to establish a “weeds strike force” to reduce the spread of willow around Te Waihora. In recent years this has resulted in \$70-\$100,000 of willow control around the lake. From next year, this will be managed by DOC staff and we are expecting a considerable benefit as we move away from contractor rates. The Department requests that Environment Canterbury continues to support the joint agency willow control programme around Te Waihora until willows are significantly reduced (targets to be agreed).
12. The Department seeks continued support from Environment Canterbury on research and conservation measures for bittern (*Botaurus poiciloptilus*) and seeks a review of the Te Waihora Lake opening process.
- a) Environment Canterbury has worked in partnership with the Department of Conservation and other stakeholders to help manage bittern in and around Christchurch and Banks Peninsula. The Department urges Environment Canterbury to continue to support this initiative (at least to \$30,000 per annum) as we find out more about this iconic threatened species. It is considered that a review of the lake opening process (Te Waihora), or other options, will be required in the future to provide better management of the habitat requirements for this species.
13. The Department supports measures to enhance the management of freshwater biodiversity across Canterbury.
- a) Enhanced measures to protect and build native fish habitat for mudfish, tuna, and whitebait habitat are necessary. Measures and rules that enhance their habitat and protect their migration routes are needed.
14. The Department supports measures to enhance the management of braided river systems
- a) These areas are “biodiversity hotspots” and are currently threatened by weeds and land development. Their perception of their value/status needs to be lifted from “wasteland” to “biodiversity hotspot”. Natural river flows need to be protected so as to maintain the in-stream habitats, and these areas also need to be kept clear of weeds and have sustained predator control in place to protect the habitats of our river bird species.
 - b) Concerted multi-agency work is needed with interested landowners and community groups to develop biodiversity corridors along rivers and streams through native riparian restoration and pest trapping.
 - c) As part of measures to enhance the management of braided river systems the protection of headwater catchments should be prioritised with a down stream focus to maintain and enhance biodiversity values.
 - d) The North Canterbury District Office manages 1101ha of braided river along the upper reaches of the Ashley/Rakahuri River and protect marginal strips along a range of rivers in North Canterbury. The Ashley River/Rakahuri Management Strategy 2008 highlighted the need to ‘*protect and enhance*

*population and habitats of native plants and animal species*² and specifies actions points to '*(p)repare reports to guide the enhancement of key indigenous plant communities*' and '*(i)mplement indigenous plant communities; enhancement projects*'³ and the Department supports further work with ECan the implement these goals

- e) The 2016-17 Environment Canterbury Annual Report stresses that '*(a)s well as protecting the most important remaining natural habitats, we have been focused on protecting and restoring waterway corridors and habitats through fencing lakes, rivers and streams, planting hundreds of thousands of native plants, and removing gorse, broom, willow and other weeds*'⁴ and the Department is focussed on protecting and enhancing riparian areas across the district and planting of further native habitat and weed control and developing the ecological restoration of the Ashley River/Rakahuri River.

15. The Department supports development of the Management Plan for the Ashley-Rakahuri Estuary.

- a) The need to protect, and educate people about, the significant wildlife and cultural values associated with the Ashley-Rakahuri Estuary was highlighted during the Bylaw submission process. The Hearing Panel considered that a management plan, incorporating a long-term vision and agreed outcomes, needed to be developed for the Ashley-Rakahuri Estuary and this was included as action ARE.2 in the Implementation Plan.
- b) It is understood that the development of a management plan for the Ashley-Rakahuri Estuary is to be led by the Waimakariri Zone Team and has been included in the LTP with a mid-term timeframe.
- c) DOC supports this inclusion but would like to request that it be given a higher priority with work commencing within the 2018/2019 financial year. The reasons for this are: the strong views expressed by submitters to both the Northern Pegasus Bay Bylaw 2016 Bylaw and the Implementation Plan, the significance of the wildlife in the Estuary, and the progress needed to achieve the agreed aspirations contained within the Implementation Plan (that 'The community, Ecan, DOC, Te Ngāi Tūāhuriri, Fenton Reserve Trustees and the Council recognise the Estuary is a wetland of international significance and actively seek to protect it').

16. The Department welcomes the focus on the support for endangered wetland ecosystems and the development of wetland actions plan

- a) The Department will work with Environment Canterbury and landowners and other stakeholders to protect and enhance the biodiversity values of these sites. Land use intensification and pastoral development have resulted in a massive loss of wetlands in Canterbury and we believe that this wetland restoration is a priority for the Department and for biodiversity in North Canterbury. The Department is committed to '*manage (including where considering concession applications) those parts of Canterbury that are identified as Wetlands of*

² Environment Canterbury. 2008: Ashley River/Rakahuri management strategy: a community vision. Environment Canterbury, Christchurch. P10

³ Ibid.

⁴ Environment Canterbury Annual Report 2016-17

*International Importance under the Convention of Wetlands of International Importance 1971 (also referred to as the Ramsar Convention) in accordance with the criteria for which those wetland(s) of international importance were nominated and New Zealand's obligations under the Convention.*⁵

- b) The Department has highlighted a range of wetland sites in the Conservation Management Strategy including in the North Canterbury District the Mount White (East Branch Poulter/Mounds of Misery) Wetland, 'Ephemeral wetland' herbfield and the Lake Lyndon Wetland, 'Lakeshore turf' herbfield as well as a range of wetlands in the Waiau/Clarence Headwaters.

I wish to be heard in support of this submission.

Dated at Christchurch this 21st day of March 2018.



Andrew Roberts
Director Operations
Eastern South Island Region
Acting pursuant to delegated authority

⁵ Canterbury (Waitaha) Conservation Management Strategy 2016, p135