



# **Decision Report**

**on the Canterbury Regional Pest Management Plan**

**Appendix 1 – Hearing Panel Recommendations on Submissions**



**CANTERBURY REGIONAL PEST MANAGEMENT PLAN**  
**Under the Biosecurity Act 1993**

**Report and recommendations of the Hearing Panel**

**Appendix 1 – Hearing Panel recommendations on submissions**

**Hearing Panel:**

**Councillor Tom Lambie (Chair)**

**Councillor Cynthia Roberts**

**Councillor Iaeen Cranwell**

**John Simmons**



# Proposed Regional Pest Management Plan

## Summary of Submissions and Panel Decisions

General comments					
Number	Name	Submission	Relief	Decision	Reasons
1.1	Bielski, Peter	No to Aerial 1080 or brodificom poisons, period.	Oppose  Oppose use of Aerial 1080 or brodificom poisons.	Reject	The council uses best practice to minimise non-target effects from the use of animal pesticides in compliance with EPA regulations.
2.1	Seymour, Paul	I vehemently object to the general term 'PESTS'. One man's pest is another man's pet.	Oppose  Delete reference to "pests" in the RPMP	Reject	This is the required term of the Biosecurity Act 1993.
2.2	Seymour, Paul	Containment Animal Pests  What is actually meant by 'containment'? Does it mean entrapment and release somewhere else or incarceration, or does it mean somehow fencing off certain areas. Cats, rabbits, stoats, etc are almost impossible to keep fenced in or out, so I'm curious how this is dealt with. And how do you contain insects like wasps? As you probably can't answer people individually, I'd just like to suggest, again, that humane methods always be employed.	Insert provisions to ensure that humane methods always be employed.	Reject	Refer submission 2.4.
2.3	Seymour, Paul	On a separate issue: I've been told that baby geese and ducks are often taken from their mothers to 'keep numbers down', which is absolutely abhorrent, since it goes against the very nature and prime directive of life. Also, a council worker (who confessed to being a hunter) said that it's common policy to 'thin out' flocks of wild birds 'for their own good'. It's not much good for the ones who die in pain. Just something to think about.	No decision requested.	Reject	Reject – no specific request.
2.4	Seymour, Paul	It's unfortunate that certain species have been introduced into environments they were not suited to, but this is hardly the individual animals' fault. All animals, native and introduced, have an equal right to life and a gung-ho approach to culling has often proved disastrous. Let's face it, the term eradication is just another way of saying 'murder'.	Oppose  Insert provisions for humane methods of diminishing their numbers - sterilisation programs for instance or re-locating	Reject	We are advised that the Council follows best practice for pest management control, and accept the Council's evidence on this matter.

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		<p>If rooks are a danger to native wildlife then I suggest humane methods of diminishing their numbers be employed - sterilisation programs for instance or re-locating them to lesser impact areas.</p> <p>What is actually meant by 'containment'? Does it mean entrapment and release somewhere else or incarceration, or does it mean somehow fencing off certain areas. Cats, rabbits, stoats, etc are almost impossible to keep fenced in or out, so I'm curious how this is dealt with. And how do you contain insects like wasps? As you probably can't answer people individually, I'd just like to suggest, again, that humane methods always be employed.</p>	them to lesser impact areas.		
3.1	Browne, Geoff	<p>Bring back the Control Board.</p> <p>Provide incentives for citizens to help eradicate pest species by trapping and shooting</p>	<p>Oppose</p> <p>Insert provision to bring back the Control Board and provide incentives for citizens to help eradicate pest species.</p>	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
6.4	Ross, Fraser Bell	Darwin's Barberry - understand that this pest plant is subject to the Biosecurity Act sections 52 and 53 and there are bans on the movement, release and spread of this plant, nor cannot it be sold, propagated or multiplied. And that Environment Canterbury will be responsible for the advocacy, education, surveillance, and that the Regional Council will provide inspections. All these measures are fully supported especially for plant nurseries and the like. A biological control organism is now available for such control and ask that the Regional Council advocate for its use locally.	<p>Support in part</p> <p>Advocate for the use of biological control organism for Darwin's Barberry.</p>	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
6.14	Ross, Fraser Bell	there should be much better education, communication and advice given right across the broad spectrum of our community. In the past Environment Canterbury was very proactive with raising awareness of pests, not only to landowners but also to people in the urban communities. Such	Ensure that awareness of pests across the broad spectrum of the community recommences urgently	Reject	While the submission is acknowledged, this matter sits outside the RPMP.

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		awareness raising needs to be recommenced urgently.			
6.16	Ross, Fraser Bell	Himalayan honeysuckle is fairly widespread in bush areas locally and again biological control methods should be sought;	Insert provisions to control Himalayan honeysuckle using biological control methods	Reject	This matter has been included as an organism of interest. No evidence presented.
6.21	Ross, Fraser Bell	NGOs and individuals undertake weed and pest control not only on the land they own or helps to manage but also on public and private land as well. Many hours of effort are made controlling weeds, such as broom, in areas where there are vulnerable native species, and within important stands of native forests here in South Canterbury.	No specific decision requested.	Reject	While the submission is acknowledged, no specific relief is included in this submission summary.
6.25	Ross, Fraser Bell	There should not be any less regulation of pests within property boundaries. However, there should be a more co-operative approach between neighbours and other organisations with land based responsibilities especially the Dept of Conservation, the Regional Council, Linz and the local District Councils.	No specific decision requested.	Accept	The Hearings Panel supports collaborative and co-operative approaches between landowners and organisations. No specific changes are made to the document.
6.26	Ross, Fraser Bell	Research: there should be ongoing research undertaken to find control agents to reduce or eliminate persistent weeds such as chilean flame creeper and old mans beard. Such research could be undertaken by other agencies with Government funding grants as the benefits could be more widespread then just for the Canterbury Region.	Provide for ongoing research into control agents	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
8.1	Heale, Toby	Pests need an environment in which to thrive. We face undoubted global warming that will bring different pests and diseases. We must not court those outbreaks by retaining or creating environments in which they will, or might, thrive. There has been activist demand for wetlands in the city. Whatever reasons are used to justify or promote them I think that they will, in the near future, be regarded as disease infested swamps and council employees will be sent to cover the water surface with diesel oil. (the preferred method of killing the	Ensure that wetlands are not established in the city	Reject	While the submission is acknowledged, this matter sits outside the RPMP.

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		pupae of flying insects such as mosquitoes). The city is not the place for wetlands. Furthermore, to promote the establishment of wetlands the level of the water table has been raised in some parts of the city. An aspect of global warming is more violent weather and we need better, not worse, drainage.			
11.1	Alderman, Sue	I am against the use of 1080 poison in our forested areas. This is an inhumane death for the birds and animals that ingest it and we have laws in our country against cruelty to animals. I am also against the use of chemical weedkillers in our parks and grass verges and any green area used by humans and animals. My dogs skin was burned by grass that had been sprayed by the sand dunes.	Oppose  Insert provisions to prevent the use of 1080 poison in forested areas and chemical weedkillers in parks, grass verges and any green area used by humans and animals.	Reject	Refer to submission 1.1.
12.1	McNeill, Steve	The current delivery of pest management in Canterbury is currently failing on several fronts. a) Responsibility for pest control. (ii) Territorial authorities should take full responsibility for all formed ie sealed and unsealed legal roads (clause 3.3.4, Table 2) as it is their land to control	Oppose  Amend provision 3.3.4, Table 2 to state that territorial authorities should take full responsibility for all formed ie sealed and unsealed legal roads	Accept in part	We agree that a consistent approach across Canterbury is desirable. However, we are concerned with the potential impact this may have on the ability of district councils to fund such activities. We have directed that the RPMP include in it an indication that a consistent approach is to be taken as part of the next review.
12.5	McNeill, Steve	d) Control methods authorised/used. (i) I do not favour the indiscriminate use of poisoned grain for pest control as it is non-specific and kills non-target species. A Press article (13 June 2017) highlights the unexplained deaths of gulls. It could be that farm use of poisoned grain for Canada Geese control has resulted in the death of native gulls.	Oppose  Insert provisions to limit the indiscriminate use of poisoned grain for pest control as it is non-specific and kills non-target species.	Reject	Refer to submission 1.1.
15.1	Banks Peninsula Marine Farmers Group - Alison Undorf-Lay	The Banks Peninsula Marine Farmers Group represents marine aquaculture growers in Canterbury. The group sits under the umbrella of Aquaculture New Zealand, and meets regularly. Many of the growers in our group are land based farmers, who are aware of the role and functions of Regional Pest Liaison Committees. While we currently do not see a need to set up a specific CMA Pest Liaison Committee, it may become desirable in	Consider provisions in the RPMP to enable the opportunity for such a group be flagged in the RPMP and set up, if required.	Reject	While the submission is acknowledged, the setting up of pest liaison committees is a matter outside the RPMP.



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		the future. If for example there is an marine plant or animal pest incursion.			
18.2	Frank, Hermann	The Plan covers a long period of time, so a review period of 10 years is supported. Also, if particular problems arise during that period, there should be the possibility to address those.	Insert provisions to review problems during the 10 year review period	Accept in part.	There is the ability to make minor changes prior to the 10 year period, including adding new site-led programmes. No changes are required as a result of this submission.
18.3	Frank, Hermann	In the past, in many situations, ECan seem to only respond when they receive reports made to them, from the general public or environmental organisations. They should be much more pro-active with regards to the monitoring of both animal and plant pest species.	Ensure the monitoring of both animal and plant pest species is much more proactive.	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
18.4	Frank, Hermann	Also, I would briefly comment on the format of the Plan. I found it very difficult to work through it as there is so much detail on some of the pages. It makes it hard to find the relevant information. The photos and detailed data and methods of controlling for particular species is welcome, but I would suggest to put this in an appendix.	Amend the RPMP to put photos and detailed data and methods for controlling particular species in an appendix	Accept in part	The final proposal has been reformatted. Better identification of plant species and photographs have been included.
18.5	Frank, Hermann	It is positive to have the regulatory framework laid out under points 2 and 3. Especially important in my eyes are the requirements of the RMA under 2.2.3 and the responsibilities of the various agencies, especially 3.3.2 for the Crown (which I understand is new), also for Kiwirail under 3.3.5	No specific decision requested	Accept	Retained in the document.
18.7	Frank, Hermann	4.2 and the listing of those species as possible pests is supported. As indicated, they need to be included as they can cause problems in places and might cause bigger problems in the future. Also, it is a way to educate the public. However, the wording 'organisms of interest' seems a bit weak. I would suggest to call them "Pest organisms of interest" or similar. The old Plan seems to have useful wording, too.	Amend 4.2 to "Pest organisms of interest"	Reject	We accept the Council's evidence that the term 'Organisms of Interest' was selected as these organisms have been intentionally not granted 'pest' status under the Biosecurity Act, the word 'pest' can not be used unless invoking this status. These are organisms that proposed to be 'watch-listed' for ongoing surveillance or future control opportunities.
26.1	Seddon, Clive	(1) 9.3.2 Effects on the environment Poisons and Operational Procedures.	Amend the provisions to require that care is taken not to spread 1080 or	Accept in part	Refer to submission 1.1.

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		(2) I support Environment Canterbury with their intention to use best practices to minimize detrimental poisoning such as 1080, of non target species. I have serious concerns that some of the operational procedures for poisoning, are responsible for killing many more non target species than is good for the environment and future generations.	poisons into rivers, creeks or Lakes even if you have permission to do so. Notes: The poison will kill aquatic Life + Ducking/Diving Birds.		
26.2	Seddon, Clive	See submission point 26.1	Amend the provisions to require that ECan does not promote via reports or media, that it is ok to spread 1080 and other poisons into Rivers, Creeks and Lakes. Notes: Ecan will lose credibility as a protective caring protective Environmental Organization. Although it is legal to spread 1080 and other poisons into Rivers,Lakes and Creeks does not make it right or safe. It will kill many of the Aquatic life, the water eco system and valuable non target species.	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
26.3	Seddon, Clive	See submission point 26.1	Insert provisions requiring Ecan to always do comprehensive surveys of their own, of Animal, Bird and Aquatic life before and after each poisoning operation. It should be prepared to quickly, alter its method if results are killing many/any non target species.	Reject	While the submission is acknowledged, this matter can be addressed outside the RPMP.
26.4	Seddon, Clive	See submission point 26.1	Insert provisions to require Ecan to note areas of non target species and avoid	Reject	Refer to submission 1.1.

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			poisoning these areas. Notes: It would be irresponsible if Ecan did lay poison in these areas.		
29.1	Howard, Ted	<p>1.3 Geographic coverage. The maps do not explicitly show that ECan boundaries extend 12 miles out to sea, and that maritime biosecurity does in fact fall within the ECan jurisdiction.</p> <p>As a resident of Te Tai o Marokura, the biosecurity of this part of Canterbury is of great significance. It is significant in recreational, economic, conservation and cultural terms.</p> <p>The economic significance to this particular region is particularly high, because of our high reliance on marine ecotourism, with whales, dolphins, seals and seabirds as the major draw cards, and it is also a significant recreational area for many throughout Canterbury, with more than half the 400+ family memberships of the Kaikoura Boating Club having home addresses south of the Conway river, as well as hosting significant commercial fisheries, and embodying many sets of other values.</p>	Amend the maps to explicitly show the ECan boundaries extend 12 miles out to sea, and that maritime biosecurity does in fact fall within the ECan jurisdiction.	Accept	Reflects the area of statutory responsibility.
29.4	Howard, Ted	I also note that I have heard significant criticism directed towards both ECan and KDC where areas controlled by them are seriously infected and are the major local seed source for reinfection, by people who have received notices to remove weeds from their property.	No specific decision requested	Reject	While the submission is acknowledged, no specific relief is included in this submission summary.
35.1	Forest and Bird - Tony Doy	The current RPMS has had some affects on weed control, but the results have not been as positive as many of us had hoped. For this to happen the new Management Plan would need some more stringent measures, but this seems not to be the case. For example, the Good Neighbour Rule is still only 10 m and the size of gorse and broom patches is still 50 m <sup>2</sup> . This is a 7m x 7m square, about the size of an average living room. Once the landowner has let it go beyond that size, there is no chance to enforce control. Since the current RPMS had been adopted,	No specific decision requested	Reject	While the submission is acknowledged, no specific relief is included in this submission summary.

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		new technologies have been more in use, especially aerial spraying (which is often used to the detriment of the environment). Most landowners would use this method to control weeds.			
38.1	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	We agree with the purpose of the proposed Plan as stated in Section 1.2	Support  No specific decision requested	Accept	This has been included in the revised plan.
41.1	Langen, Helen	My submission concerns people other than landowners who are responsible for weed and pest control. I believe if Ecan was able to force people who lease land, for example, to meet the conditions of their lease that often requires that weed and pest control be undertaken, that it would take it from being a civil situation to a council controlled situation.	Oppose  Insert provisions to force people who lease land to meet the conditions of their lease that often requires that weed and pest control	Reject	We note the requirement for boundary rules for land, however the conditions in leases are a private matter. While the submission is acknowledged, this matter sits outside the RPMP.
49.1	Kurow Pest Liason Committee - Peter Reid	The addition of Good Neighbour rules is a welcome move and hopefully will address some of these issues but it will only really work if you have 'good neighbours'. Enforcement will no doubt still be required in some cases but it is seen as use of a blunt instrument and does nothing for good working relationships between Ecan staff and landowners so good communication and cooperation would be seen as the first lines of approach in any impending situation.	No specific decision requested	Accept in part	The submission supporting good neighbour rules is accepted and the other matters in the submission summary noted.
53.2	Rural Advocacy Network - Jamie McFadden	The use of boundary and internal rules is generally supported. However there are a small number of landowners that continually flout the boundary rules and we would like to see this addressed.	Insert provisions in the RPMP to address landowners that continually flout the boundary rules	Accept in part.	The submission supporting good neighbour rules is accepted and the other matters in the submission summary noted. Separate provisions are not required as enforcement and compliance action can be undertaken.

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53.3	Rural Advocacy Network - Jamie McFadden	We support the Crown being bound by the strategy through the inclusion of the Good Neighbour Rules. This has been a significant anomaly for many years and has been a frustrating issue for landowners that share a boundary with Crown land.	Support  No specific decision requested	Accept	The submission supporting good neighbour rules is accepted and the other matters in the submission summary noted.
53.5	Rural Advocacy Network - Jamie McFadden	We support the work of the local pest committees. However we understand that the Hurunui Nassella Liaison Committee was not consulted over some of the proposed changes to nassella. This is not collaboration and we submit that pest committees should have an integral role in drafting policy changes.	Insert provisions in the RPMP to ensure that pest committees have an integral role in drafting policy changes	Reject	While the submission is acknowledged, drafting of the provisions is a matter that sits outside of the RPMP.
53.6	Rural Advocacy Network - Jamie McFadden	Our main issue is not the strategy or rules but how the rules and inspection process are implemented. There have been significant problems and inconsistencies with implementation over many years. Feedback from many landowners is that the pest implementation system has been the biggest cause of frustration in dealings with ECan. This has created an unnecessary extra cost burden on ratepayers and compromises the ability to achieve successful outcomes. If the CRPMP and rules as proposed prevents these implementation concerns from being addressed then we oppose the rules as drafted.	Ensure provisions do not exacerbate stakeholder concerns regarding implementation.	Accept in part.	While the plan cannot directly address the matter of implementation, we accept the staff recommendations and evidence to revise the areas subject to the relevant inspection dates.
53.18	Rural Advocacy Network - Jamie McFadden	Inspections: We submit that a new concept be introduced into the implementation system for pest inspections for gorse, broom and nassella. Where landowners that generally have a good track record are in minor breach they should not be issued non-compliance. Some inspectors practice this concept already. As an example where a landowner has missed a small number of nassella some inspectors identify the missed areas on a map or leave a marker on a fence post while others will issue non-compliance.	Amend provisions for gorse, broom and nassella inspections. Where landowners that generally have a good track record are in minor breach they should not be issued non-compliance.	Reject	While the submission is acknowledged, this matter sits outside the RPMP.
55.1	Waiake Forestry Ltd - Alan Ogle	We agree with the purpose of the proposed RPMP as stated in Section 1.2 and with the Objective 4 of the proposed RPMP as stated on p.35.	Support	Accept	Apart from numbering, no changes have been made to this provision.

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56.3	Hurunui District Council - Stephanie Chin	HDC supports the principles contained within the Good Neighbour Rules, the setbacks proposed within them and the fact the Crown will be subject to these rules. HDC also supports the positions of Federated Farmers and the Rural Advocacy Network in relation to the Good Neighbour Rules.	No specific decision requested	Accept in part	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
59.1	Timaru District Council - Bede Carran	The Council is generally supportive of the strategy and the four key objectives it promotes. We support the intent of the Plan – particularly the focus on new and emerging pests.	Support  No specific decision requested	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
59.2	Timaru District Council - Bede Carran	<p>The document states “...this mixed approach to road reserve pest management is the result of previous reviews of the Strategy and districts seeking local approaches to pest and road reserve management. Some road controlling authorities have indicated a willingness to take on the responsibility while others prefer existing arrangements to remain that acknowledge the different farming practices as well as general maintenance responsibilities...”.</p> <p>While we accept this is currently the case, we wonder about the inconsistency of this approach as well as the impact on those Territorial Authorities (TAs) that have accepted this responsibility. We question whether this is a reasonable way forward and its effectiveness as a sustainable, long-term approach to achieve the objectives of the plan, particularly in light of the length of time the plan is operative.</p> <p>We estimate that Timaru District Council spends around \$20,000 per year on this work, funded by Timaru District ratepayers. We question the effectiveness and fairness of this region-wide, where some of the region’s ratepayers are paying for this directly, whereas others are not. We also question the effectiveness of two distinct types of agencies (i.e. TAs and adjacent occupiers) carrying out this work, with differing motivations and funding sources.</p> <p>We believe that the management of road reserve pests should be either one or the other – managed by TAs or by adjacent land occupiers - to enable</p>	Amend the PRPMP to develop a more consistent approach to the issue of pest management on formed road reserves.	Accept in part	Refer to submission 12.1.

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		application of a more consistent approach, the use of common practices and standards and employ a consistent monitoring regime. Any management approach needs to ensure that the recovery of costs recognises an appropriate split between public and private good.			
67.1	Selwyn District Council - Lisa Arnott	SDC supports the overall proposed Canterbury Regional Pest Management Plan 2017- 2037. The proposed plan aligns with the Council's current pest management strategies.	Support  No specific decision requested	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
72.1	Waimakariri District Council - Geoff Meadows	Further to this Council's comments on the Canterbury Regional Pest Management Review Discussion Document of January 2016, the proposal for the Canterbury Regional Pest Management Plan 2017-2037 is generally supported by this Council.	No specific decision requested	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
72.2	Waimakariri District Council - Geoff Meadows	The proposed approach to pest management outlined on page 11, that emphasises that pest management is an individual occupier's responsibility, is fully supported. This of course flows on to the requirement that Territorial Authorities are required to control pests on land that they occupy. In addition, focusing more on preventing new pest plants and animals entering the Region, and placing more responsibility on individual landowners to manage pest plants and animals on their properties themselves, is commendable and supported. The shift in emphasis away from focusing solely on pest plants and animals that impact on production land, to also incorporating managing pest plants and animals for biodiversity outcomes, is also supported.	No specific decision requested	Accept	We agree with this submission. We note that the principle also has a flow on effect with regard to road controlling authority responsibility for pests.
72.3	Waimakariri District Council - Geoff Meadows	The table on page 13 (table 2) setting out the responsibility for plant pests on road reserves for each Territorial Authority in Canterbury brings welcome clarity to this issue. This records in the case of Waimakariri District that adjoining land occupiers have full responsibility for controlling plant pests on formed and unformed road reserves which is supported.	No specific decision requested	Accept in part	While we consider that immediate changes to the road controlling authority would create a financial burden for pest control, we consider it appropriate that a signal is put in the plan that a consistent approach across the region is required. This will be reviewed as part of the 10 year review, with sufficient time for prior consultation with road controlling authorities.

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72.4	Waimakariri District Council - Geoff Meadows	This Council agrees that it is sensible and reasonable that scarce biosecurity resources are prioritised, and that the Regional Council concentrates on programmes focused on prevention, early intervention, and pest risk pathway management. In addition, the acknowledgement that for some pest plants and animals, eradication or even effective containment is not feasible, is a welcome and sensible policy setting.	No specific decision requested	Accept	No changes are required as a result of this submission.
72.6	Waimakariri District Council - Geoff Meadows	The Plan is greatly enhanced by the pictures, together with a description and the adverse effects, of each of the pest animal and plant species to be managed under each pest management programme. This makes the document user-friendly, readable, practical and useful.	Retain the pictures, description and adverse effects for each pest animal and plant species.	Accept in part	Improved photos to assist with identification have been included in the plan.
75.1	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga is concerned that the proposed plan may not adequately provide for the relationship of Ngai Tahu Whanui with their 'ancestral lands, waters, sites, wahi tapu, and taonga.' Whilst Te Runanga is supportive in-principle of the mechanisms proposed, Te Runanga notes that there is limited analysis as to how the plan will address pest management issues that are of importance to Ngai Tahu Whanui. For example, the plan does not identify pest species that are having an impact on Statutory Acknowledgement Areas, wahi tapu, wahi taonga or mahinga kai. Te Runanga would like to see section 70 of the Biosecurity Act more thoroughly and explicitly addressed in the finalisation of the plan.	Amend the RPMP to explicitly address section 70 of the Biosecurity Act	Accept	Greater recognition of iwi management plans and their ongoing development is required, as well as engagement with iwi. Amend section 2.4 as follows:  <del>Iwi Management Plans have been considered through the development of the plan. A number of iwi management plans have been developed by runanga, which were reviewed in the development of the PRPMP. The iwi management plans outline particular issues in relation to pest management and biodiversity, and include particular areas or sites of value to runanga in relation to mauri and mahinga kai. Using these plans as a basis, ongoing consultation will be maintained during the life of the plan to discuss pest species that are having an impact on site of value to runanga. This may take the form of a joint work programme with both Te Runanga and runanga.</del>
75.3	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga supports the five-tiered approach of pest management which includes an Eradication Programme, an Exclusion Programme, a Progressive Containment Programme, a Sustained Control Programme, and a Protecting Values in Places (Site-led) Programme. This recognises the different threat levels of different pests, as well as how established they are in certain areas, and if they are a pest which is also being used for economic	Ensure that the long-term aim is always eradication.	Accept in part	While support for the five-tiered approach is acknowledged, we accept the Council's evidence that eradication of all pest is not always practical, particularly given the 20 year life of the plan and limited resourcing.



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		purposes (e.g. wilding conifers on forestry blocks). However, the long-term aim should always be eradication.			
75.4	Te Runanga o Ngai Tahu - Ryan Hepburn	One of the most effective ways to achieve pest management goals outside of the regulatory sphere is through education. Te Runanga support the provision in the proposed plan to provide education to land-owners and occupiers. It is important, though, that this education is extended to the general public as well as the tourist industry.	Ensure that education is extended to the general public as well as the tourist industry.	Accept in part	This matter is already addressed in the plan at Section 5.3.4.
75.5	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga wish to be involved in discussions around the setting of proposed containment or control areas for particular species and further work on classification options, including consideration of new pest species.	Ensure that Te Runanga is involved in discussions around the setting of proposed containment of control areas, including consideration of new pest species.	Accept	<p>The proposed plan sets containment and control areas for pests, where relevant to the specific programme. Te Runanga will be consulted when new site-led programmes are being considered in the future.</p> <p>The Panel consider it important that staff continue to engage with Ngai Tahu as part of operational plan development processes.</p>
75.6	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important to Manawhenua that pest control operations are designed and implemented so as to avoid impacts on mahinga kai and other cultural values. This includes selection of appropriate pest management tools. One important example of this should be a focus on natural solutions where possible, as opposed to the use of hazardous substances. Furthermore, within many smaller communities in the region people rely on seasonal work for income. Possum hunting and trapping are an example of this in the pest management sphere. We would like to see pest control techniques such as this to continue and be used in conjunction with other methods. To achieve the best results for all parties, on-going dialogue with Manawhenua must occur.	Ensure that pest control operations are designed and implemented so as to avoid impacts on mahinga kai and other cultural values. To achieve the best results for all parties, on-going dialogue with Manawhenua must occur.	Accept in part	<p>Implementation of control operations takes place outside of the RPMP. We accept the Council's explanation that staff follow best practice to achieve pest management objectives.</p> <p>The Panel consider it important that staff continue to engage with Ngai Tahu as part of operational and implementation processes.</p>
75.7	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important that cultural, community, and environmental considerations do not come secondary to economic factors. All four are important and should be considered with equal weighting.	Ensure that cultural, community, and environmental considerations do not come	Accept	We agree with this sentiment and consider that the matters are reflected throughout the RPMP.

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			secondary to economic factors.		
75.8	Te Runanga o Ngai Tahu - Ryan Hepburn	It is important that adequate pest management monitoring and surveillance is undertaken, and it is encouraging to see Environment Canterbury take responsibility for the monitoring and surveillance of a number of species in the plan. While such monitoring is helpful in measuring the success of pest management efforts, it can also be used to measure the effects of the approaches taken on indigenous flora and fauna. The CRPMP does not contain any provision for monitoring the effects of pest management on indigenous species.	Insert provisions in the RPMP to ensure that Environment Canterbury specifically discuss with Papatipu Runanga and Environmental Entities provisions in the CRPMP requiring the monitoring and surveillance of indigenous species which includes the power of review where current pest management practice is found to be detrimentally affecting indigenous species.	Accept in part	While the submission is acknowledged, this matter sits outside the RPMP. The impact of control operations should be considered as part of the annual review of the operational plan.
75.10	Te Runanga o Ngai Tahu - Ryan Hepburn	One specific appendix to be added to the plan should involve each effected Papatipu Runanga identifying ancestral lands, waters, sites, wahi tapu, and taonga that have pest management issues. A timeframe must be put in place to ensure the appendix is created in a timely manner. This appendix, coupled with the provision for site-led programmes (discussed below), have the potential to positively influence pest management in culturally significant areas.	Insert an appendix in the RPMP detailing each effected Papatipu Runanga and identifying ancestral lands, waters, sites, wahi tapu, and taonga that have pest management issues.	Reject	Detail was not provided at the hearing. The Council has the advised that ongoing consultation will take place with iwi throughout the life of the plan (refer submission 75.1) and such sites can be identified in that process.
78.1	Department of Conservation - David Newey	The Director General supports the various Objectives, Principle Measures and Rules in this Plan, where not otherwise referred to in this submission, as being appropriate in giving effect to the Biosecurity Act.	Support  No specific decision requested	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
78.2	Department of Conservation - David Newey	The Director General supports the purpose of the plan	Support  Retain Plan Establishment Section 1.2 "Purpose"	Accept	No changes are required as a result of this submission.

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78.7	Department of Conservation - David Newey	The Director General considers that effective site led programs require, in many cases, strong collaboration with other agencies and/or groups of land occupiers.	Support in part  Insert principal measure: Collaboration. Council will collaborate with other agencies and land occupier groups, including the development of agreements, for the effective management of pests to protect the values of specific sites.	Accept	We accept the staff recommendation that the following principal measure is added in section 5.3:  <u>Collaboration</u>  <u>Environment Canterbury will collaborate with other agencies and land occupier groups, which may include the development of agreements, for the effective management of pests to protect the values of specific sites.</u>  We further agree that 'collaboration' is added to the Principal measure to be used sections under objective 19 and objective 20.
79.1	Christchurch City Council - Brenda Greene	We appreciate that national directives require ECan to transition to a risk management framework. As such, the Plan provides a good analysis of pests and their costs and benefits, and we support the principle of the Good Neighbour Rules. The tone and audience of the Plan, however, appears to be for enforcement staff rather than the public or landowners/occupiers.	Amend the RPMP to have a greater focus on 'how' would make the plan easier for landowners/occupiers to understand.	Reject	We are generally happy that the tone of the RPMP is that of regulatory document. How pest management is undertaken will form part of the operational plan. No changes are proposed as result of this submission.
79.2	Christchurch City Council - Brenda Greene	The change in focus and funding will give ECan greater flexibility to act quickly in response to emerging risk. However, it needs to be made clear how ECan will maintain its existing progressive containment, sustained control and site-led programmes, and how new ones can be developed.	Amend the RPMP to provide clarity for how ECan will maintain existing, and develop new programmes, including through its long standing partnerships with the Council, the Department of Conservation, and the community.	Accept in part	Insert new section 1.1 that sets out priorities for pest management. We note that funding of particular programmes will be undertaken as part of Long Term and Annual Plan processes, as well as the operational plan required under the BSA, all of which sit outside the RPMP.
79.4	Christchurch City Council - Brenda Greene	The regulatory focus of the Plan clearly outlines the roles and responsibilities of enforcement staff, but the provision of partnerships both "inside" and "outside" the plan, how the Council reports through Operations Plans and Pathway Management Plans needs to be clearly outlined.	Amend the RPMP to clearly outline the provision of partnerships both "inside" and "outside" the plan, how the Council reports through Operations Plans and Pathway Management Plans.	Accept in part	We accept the Regional Council's evidence that partnerships are key to achieving pest management objectives, but sit alongside the RPMP as another tool.  We note submission point 78.7 seeking inclusion of a principal measure 'Collaboration' to be applied to the site-led programmes, which we have accepted.

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79.6	Christchurch City Council - Brenda Greene	The Plan needs to provide certainty for agencies, community leaders and nongovernmental groups committed to existing partnerships with ECan. For example, previously the Community Initiative Programme to control possums and rabbits on Banks Peninsula was a process “inside” the Plan, but is now “outside” the Plan. To provide certainty, the Plan needs to specify how existing programmes are supported.	Insert provisions in the RPMP to specify how existing programmes are supported	Reject	While the submission is acknowledged, this matter sits outside the RPMP, and is a matter for Long Term and Annual Planning processes.
79.7	Christchurch City Council - Brenda Greene	Financial, leadership and/or regulatory support by ECan “outside” the plan may be provided through a private plan change to the Strategy, or through the Long Term Plan and/or Annual Plan processes or through the Operations Plan (Council staff preference) or by other means. The Plan should either specify this or include a process “inside” the Plan.	Amend the RPMP to specify the ways financial, leadership and/or regulatory support by ECan "outside" the plan may be provided or include a process "inside" the RPMP	Accept	We agree. Better guidance is included in the plan for the consideration of site led programmes.
79.8	Christchurch City Council - Brenda Greene	If all funding and reporting is to be directed through the Annual Plan process and an “internal” Operations Plan, Council staff have some concerns that ECan's requirements under the Local Government Act 2002 to provide transparency may not be met, particularly in regards to the costs and Levels of Service provided to achieve the plan objectives, and how well the resulting specific, measurable, achievable, relevant and time bound objectives are met	No specific decision requested	Reject	While the submission is acknowledged, no specific relief is included in this submission summary.
79.9	Christchurch City Council - Brenda Greene	If all partnerships with other governmental and non-governmental organisations are “outside” the Plan, then by definition Pest Management Liaison Committees are “outside” the plan. If this is the case, this section needs to be removed from the plan.	Amend the RPMP to ensure that all partnerships with governmental and non-government organisations and Pest Management Liaison Committees are described consistently in the plan, or removed.	Accept	We agree with the submitter that this function sits outside of the plan. The definition has been removed from the Glossary of Terms in Appendix 1.
79.10	Christchurch City Council - Brenda Greene	If Pest Management Liaison Committees are “inside” the plan then a rationale for their role needs to be defined – is it now regulatory? If the role is not defined then the plan needs to state that their role	Amend the RPMP to define the role of Pest Management Liaison Committees, if this is now a	Reject	See submission point 79.9

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		will be reviewed. If the role is not reviewed, then existing partnerships such as the Community Initiative Programme (CIP) need to remain "inside" the plan.	regulatory role, or if this role is undefined, state that this will be reviewed. If the role is not reviewed, then include existing partnerships such as the Community Initiative Programme (CIP).		
79.11	Christchurch City Council - Brenda Greene	The Plan states that ECan will use section 5.3 as a "measure of procedure" for species without any rules in place. It could be that the "measure of procedure" actually means "principle measures". If not, it needs to be defined. If it is, then "measure of procedure" needs to be replaced by "principal measures". This may be an unintentional error, so we assume that the measure of procedure means principle measures.	Amend the RPMP to clarify "measure of procedure"	Reject	This reference was not found.
79.12	Christchurch City Council - Brenda Greene	The Plan encourages community leadership for the coordinated control of widespread pests under the sustained control and site led programmes. Leadership is demonstrated through the "War on Pests Guide for landowners on Banks Peninsula", and "2050 Ecological Vision 2050", "Te Waihora Joint Management Plan" jointly prepared by ECan and community leaders. These plans (and others) demonstrate how support for pest control from ECan and others can be secured. If this is how ECan intends to establish partnerships "outside" the Plan, to provide certainty, this needs to be stated.	Amend the RPMP to detail how ECan intends to establish partnerships "outside" the RPMP, and include details of the financial commitment and lead agency.	Reject	We do not want to prescribe how these partnerships are developed, and the financial commitments are the subject of long term and annual planning processes.
79.13	Christchurch City Council - Brenda Greene	It is a requirement of the national review of pest management strategies that Pathway Management Plans are developed. The Plan gives these pathway plans only a passing mention. We recommend that Pathway Management Plans will be developed within a specific (less than 5 year) time frame and be led by ECan.	Support in part  Insert the following:  The 2012 amendments to the Act provide for regional pathway management plans. These plans.....area: ECan will develop pathway management plans for AND state priority pathways and locations OR	Reject	The 2012 amendments to the Act allow for the development of pathway management plans, but does not require that these are prepared.  This does not limit the future preparation of a pathway management plan where the Regional Council decides to prepare and make one.

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			provide locations on a map OR The CRPMP will be reviewed within 5 years to include Pathway Development plans for AND state priority pathways OR provide locations on a map.		
79.14	Christchurch City Council - Brenda Greene	To guide implementation, we suggest principles be included in the Strategic background.	<p>Insert the following after first paragraph that ends with "Landowners and/or occupiers and the wider community....policies and plans."</p> <p>The following principles will be used to guide and prioritise implementation of the Strategy</p> <ol style="list-style-type: none"> <li>1. Pest-free areas shall be maintained pest free where possible</li> <li>2. Where a range of control methods exist that are able to be used effectively by landowners, promote community education, awareness and ownership of pest issues, and build community capacity.</li> </ol>	Reject	We accept the Regional Council's evidence that the RPMP does not seek to generally keep pest free areas free of pests, only where this is a specific objective for a pest. The 'Principal measures to manage pests' in section 5.3 of the PRPMP detail the principles to be followed.
79.15	Christchurch City Council - Brenda Greene	Page 3 of the CRPMP states The Act also requires the preparation of an operational plan and annual reporting on the Operational Plan, in accordance with section 100B. These are internal Environment Canterbury documents which provide	<p>Oppose</p> <p>Amend the following:</p> <p>The Act also requires the preparation of an</p>	Accept in part	<p>We accept the Council's recommended amendment to 2.1.1 as follows:</p> <p>These are internal Environment Canterbury documents which provide technical information for the implementation of programmes, including monitoring</p>

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		technical.....CRPMP. internal is incorrect as S100B states that Operational plan reports can be included in annual reports or to the public as a separate document, or as an extract from the annual report. We support the preparation and publication of an annual operations plan that specifies the budget spent per annum and trends in the density or index of abundance of a pest over a specified area and time frame.	operational plan and annual reporting on the Operational Plan, in accordance with section 100B. These are internal Environment Canterbury documents which provide technical.....CRPMP, specify the budget spent per annum and trends in the density or index of abundance of a pest over a specified area and time frame. ECan will prepare Operational Plans as a separate, publicly available document.		and surveillance projects, which support the outcomes of the CRPMP
79.16	Christchurch City Council - Brenda Greene	<p>List key Regional and District Council Plans and Strategies that are influenced by and influence the RPMP.</p> <p>ECan acts on behalf of the Chatham Islands Council. The Chatham Islands is free of many pests that are widespread in Christchurch. Although Christchurch City is a low risk from new arrivals from outside NZ, Christchurch Airport is a risk to the Chatham Islands.</p>	<p>Insert the following:</p> <p>2.1.3 Chatham Islands Pest Management Strategy</p> <p>ECan will prepare a pathway management plan in partnership with the Christchurch Airport. In the interim, and as part of implementing such a plan, staff at Wellington, Christchurch and Chatham Island Airports will be trained to ensure inspection and enforcement of surveillance pests</p>	Reject	We accept the Regional Council's evidence that the Chatham Islands has its own strategy in place, and is not referenced in the RPMP, in the same way that other neighbouring regional council's strategies and plans are not referenced. Any additional reference may add confusion regarding roles and responsibilities under this RPMP.
79.17	Christchurch City Council - Brenda Greene	Outline the roles and responsibilities of the Department of Conservation as the lead agency for the containment of pest fish except Koi carp.	<p>Insert the following:</p> <p>2.2.6</p> <p>Freshwater Fisheries Regulations 1983</p>	Accept in part	We agree that the Freshwater Fisheries Regulations should be referenced.

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			The Department of Conservation is the lead agency for noxious fish. For the purposes of the Strategy, ECan has agreed to be the lead agency for Koi carp.		
79.18	Christchurch City Council - Brenda Greene	<p>Formed road reserves and rails are a pathways. Christchurch City Council has yet to develop policy or to undertake pest management as part of road reserve management. We would be pleased to work with ECan in developing this.</p> <p>The major pathways into and out of Christchurch are the main highways and Christchurch airport. The CPMP needs to state how partnerships between ECan and Land Transport New Zealand or the Christchurch airport or major supply chains will be formed. Once this is identified, the Christchurch City Council will be better placed to be able to scope the support that could be provided for surveillance of pest control on roadways. We suggest that large freight companies, for example, be required through rules to provide evidence of surveillance for not in region exclusion pests.</p>	<p>Support in part</p> <p>Amend the following:</p> <p>After Table 2 and the associated note:</p> <p>3.3.4 Rail and formed road reserves</p> <p>After Table 2 and associated note:</p> <p>3.3.5 Rail</p> <p>Road and formed road reserves are pathways/vectors for disease and pests.</p> <p>ECan will develop guidelines for District Councils for the management of pests on road reserves as part of scoping Pathway development plans for formed road reserves.</p> <p>For the purposes of the Act....expectations.</p>	Reject	We accept the Regional Council's evidence that development of guidelines by it, for district councils, for management of road reserves, is not appropriate.
79.19	Christchurch City Council - Brenda Greene	The maps in the Appendices give clarity as to where ECan will be providing regulatory support to landowners, and a clear rationale for regional and landowner cost analysis. Maps outlining where high value areas are to the region would provide similar	<p>Amend the following:</p> <p>A number of pests that are well established.....in Table 14 below.</p>	Accept in part	We accept the Regional Council's reasoning that there are many factors to consider when developing a pest management programme.



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		certainty to ECan, the regional community and land occupiers as to where financial and/or regulatory support might be expected.	ECan will identify areas of high value to the region as part of implementing "A Biodiversity Strategy for the Canterbury region" or its successor, and give priority to protecting these areas through the sustained control programme.		We do consider that it is appropriate to insert priorities for pest management in section 1.1, which picks up on those areas that have significant biodiversity value. This will be implemented through the process of identifying areas for site-led programmes.
79.20	Christchurch City Council - Brenda Greene	How the effectiveness of the Pest Management Liaison Committees can be improved needs to be outlined.	<p>Support in part</p> <p>Insert the following:</p> <p>Pest management liaison committees have .....communities.</p> <p>The committees have been (statement on effectiveness) in achieving coordinated control through targeted rates for widespread pests for a range of values. Advice on implementation....etc. The effectiveness of the committees have been reviewed to ensure its representation is aligned with the values and impacts outlined in S32 of the Biosecurity Act.</p>	Reject	We accept the Regional Council's reasoning that this statement is general in nature and would not add to the RPMP. Refer also to submission 79.9.
79.30	Christchurch City Council - Brenda Greene	Section 76(1)(j) and (k) of the Biosecurity Act 1993 requires that a proposal for a pest management plan must specify what the effects of implementation of the CRMP are likely to be, with respect to the following matters: the relationship of Maori and their culture and traditions with their ancestral lands, waters, sites, waahi tapu and taonga.	<p>Support in part</p> <p>Amend as follows:</p> <p>9.3.1 Effects on Maori</p> <p>The Plan is expected to have overall beneficial effects for Maori culture and traditions the relationship of Maori and</p>	Reject	This section no longer appears in the RPMP, as it is no longer a proposal.

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			their culture and traditions with their ancestral lands, waters, sites, waahi tapu and taonga.		
79.31	Christchurch City Council - Brenda Greene	We assume that the purpose of including organisms of interest is because they could form the basis of site-led programmes outside of the Strategy. If this is the case, it needs to be stated. If not, the purpose of listing these pests needs to be stated.	<p>Insert the following after Appendix 2, Organisms of Interest</p> <p>The purpose of listing organisms of interest is to clarify which pests could form the basis of site-led programmes outside of the Strategy.</p> <p>OR</p> <p>The purpose of listing organisms of interest is to (and state rationale)</p>	Reject	We accept that section 4.2 has an adequate explanation of what an organism of interest is.
81.8	QEII National Trust - Alice Shanks	See submission point 81.7	Provide clarity in the RPMP to detail policy around collaboration with other agencies like DOC		Refer to submission 79.4 and 78.7.
81.9	QEII National Trust - Alice Shanks	See submission point 81.7	Amend the RPMP to give effect to the NPPA	Reject	There is no statutory requirement to give effect to the National Plant Pest Accord, however we do note that all of the species that do appear in that document and present a risk threat to Canterbury are notated with an asterisk in the RPMP.
82.1	Ministry for Primary Industries - Sherman Smith	We consider the proposal to generally meet the requirements of the NPD, however we have some specific comments regarding aspects of the proposed good neighbour rules	No specific decision requested	Accept	While the submission is acknowledged, no specific relief is included in this submission summary.
90.4	Johnstone, Robert	The enforcement division need to have regard for the prevailing economic circumstances and the ability to pay. On this property we have had a very active control programme over the decades when it has been affordable. But every property is different	Amend the RPMP to ensure flexibility about enforcement	Reject	We accept the Council's position that enforcement is not detailed in the RPMP and that it sits outside of the Plan.

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		and there needs to be some flexibility and understanding about enforcement.			
90.5	Johnstone, Robert	there needs to be more consistency with enforcement, there are properties near or neighbouring this one where no enforcement was done and it is wall to wall and now compliant, whereas if we get seedling re-growth we are non compliant and have to take control action. And there should not be arbitrary boundaries determined in the office with no consultation which allows some (in this case the Crown) to get off scott free with OMB infestations in the riverbed.	Ensure that enforcement is applied consistently.	Accept in part	Application of previous rules to Crown owned land was limited. The RPMP includes a number of good neighbour rules (GNRs) which may in part alleviate the concerns of the submitter. No other changes are proposed in relation to this submission.
90.17	Johnstone, Robert	<p>Roadsides The rules here are (almost) fine but only if there is even enforcement throughout the region. Otherwise a return to the recommendations of the 2006 review would be my preference .. ----that is to hand over the responsibility for roadsides to the local District Councils .</p> <p>( Hurunui DC take charge of theirs now and it works well.) Enforcement in this Waimakariri District by Ecan is very patchy and inconsistent EG making farmers cut their gorse fences before the end of January (before Gorse flowers) is quite silly Cutting gorse fences is a job for the winter months not busy summer time, and gorse usually flowers twice a year anyway And having a 4 or 5 year interval between inspections seems too long.</p>	Amend the RPMP to ensure that roadside rules are enforced evenly throughout the region	Accept in part	<p>Having considered the proposal, submissions and evidence, we prefer a consistent approach to management of roadsides throughout the region. We acknowledge that there are cost implications of such an approach. We have considered the evidence of Mr Johnstone and Mr Meadows on behalf of Waimakariri District Council. We consider that it is prudent that a signal is included in the RPMP that a consistent approach to management of roadsides is taken in the first review of the Plan, to enable sufficient time for planning and funding of roadside management by those road controlling authorities that do not currently do so. We consider this is equitable to all ratepayers and landowners in the region, and reflects what we consider to be a fair and reasonable principle that land occupiers take responsibility for the land they occupy or are responsible for.</p> <p>We provide for this by including the following amendment at 3.3.4 to include the following text:</p> <p><i>As part of the 10 year review of the CRPMP, Environment Canterbury will consult with Road Controlling Authorities to establish a consistent policy for roadside pest management. Consultation will occur in a timeframe that enables sufficient time to make financial provisions for the changes in policy (should the consistent approach result in all Road Controlling Authorities becoming responsible for road reserve pest management).</i></p>

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90.18	Johnstone, Robert	Enforcement & Recognition of Efforts I believe a whole property approach should be standard practice for larger properties with efforts being made appropriately recognised.	Amend the RPMP to apply a whole of property approach to enforcement	Reject	Refer to submission 90.4
92.1	McDonald, Fiona	This would allow the community to receive the appropriate education and support to understand the necessity to remove pest species from their properties.	Support Retain provision 5.3.4 (c)	Accept	This provision has been retained,
92.2	McDonald, Fiona	Support a regionally coordinated approach.	Support Retain provision 1.2	Accept	This provision has been retained.
93.1	Otago Regional Council - Warren Hanley	The effective management of some pest requires a pan-regional approach. ORC is interested in discussing with ECan how a collaborative approach would benefit both our regions. To make such an approach work, our councils would need to be able to identify where we seek common desired outcomes and where we do not. Clearly identifying in the proposed PRMP how pest management fits with desired outcomes for biodiversity (in the case of the ECan Biodiversity Strategy), and with ECan's larger planning framework would benefit pan-regional efforts to help identify issues where ORC and ECan can work together to implement shared strategies for common objectives.	Ensure that effective pan-regional pest management occurs through a collaborative approach, including identifying where we seek common desired outcomes.	Accept	While the submission is acknowledged, no specific relief is included in this submission summary. We consider this submission can be appropriately addressed outside the plan and no changes are proposed as a result.

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Number	Name	Submission	Relief	Decision	Reasons
49.5	Kurow Pest Liason Committee - Peter Reid	We also request that Ecan pursue with the relative scientific agencies the future role of genetics in pest control as long term this seems to be where some of the answers may lie, we know the future use of poisons is going to become more and more difficult because of environmental reasons and public perceptions.	Insert provisions in the RPMP for Ecan to pursue with the relative scientific agencies the future role of genetics in pest control as long term	Reject	We accept the Council's position that this submission is outside the scope of the RPMP, however note the staff comment that it works with external agencies in seeking alternative ways to manage pests.
56.4	Hurunui District Council - Stephanie Chin	HDC has concern about the general direction of the strategy and the financial implications it would within them and the fact the Crown will be subject to these rules. HDC also supports the positions of Federated Farmers and the Rural Advocacy Network in relation to the Good Neighbour Rules.	No specific decision requested	Reject	While the submission is acknowledged, no specific relief is included in this submission summary. We do note that the funding provisions have been significantly simplified, and we agree that the costs fall appropriately.
58.1	KiwiRail Holdings Limited (KiwiRail) - Pam Butler	<p>The Plan identifies Kiwi Rail as a key stakeholder in the Plan and that the Council will work by agreement on mutual obligations and expectations. There are unusual practical challenges associated with managing pests along linear infrastructure such as the rail corridor. Manly it is difficult to access due to;</p> <ul style="list-style-type: none"> <li>• terrain</li> <li>• limited access points</li> <li>• difficulty identifying pest plants from the track (especially low numbers and seasonal species)</li> <li>• the need for specialist equipment and extensive planning and staging work between operational train activities.</li> </ul> <p>KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken while recognising specific operational and access logistics, cost constraints, and current pest management control measures.</p>	Retain provision 3.3.5	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
58.2	KiwiRail Holdings Limited	KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken within	Amend Section 8 to make mention of alternate formal	Accept in part	The Council provided further discussion on this matter in relation to our questions in Minute 3. We accept the Council's explanation that management

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	(KiwiRail) - Pam Butler	<p>operational/financial parameters. As noted in Clause 3.3.5, KiwiRail supports discussing and agreeing an approach which recognises its unique circumstances. The PPMP should include provision for alternate management approaches (such as an agreed Management Plan) as a method of compliance with the PPMP. A mutually developed Management Plan would target efforts, over the life of the Plan, with appropriate review points. Priorities could include a focus on regionally significant ecological areas/sites and areas being adversely affected economically.</p> <p>A Management Plan approach is a useful approach to priority setting, monitoring and adaptation where management options are limited by physical and economic constraints. They provide the opportunity to adapt, update and revise implementation methods and locations over time, within an overall structure where action can be agreed, and then programmed over the term of the Plan. A Clause should be included to make reference to alternative methods of achieving PPMP Compliance including negotiated Management Plans. This has the advantage of providing both parties with greater certainty about achieving plant pest management outcomes.</p> <p>Management Plans can provide for a progressive control over time and add value to the control objectives. Management Plans could also include:</p> <ul style="list-style-type: none"> <li>• contributions to biological control agent trials and release</li> <li>• targeted timing of pest management with agency or other projects</li> </ul>	<p>pest management responses, for example;</p> <p>Council may develop alternative management plans (including Management Plans with agencies to establish levels of service with those agencies, to act to control pests on their land to agreed priorities.</p>		<p>plans can be used as a method outside of the plan and that their use is not precluded. To that extent, the submissions is accepted.</p> <p>We did not receive any evidence from KiwiRail on this issue, and KiwiRail elected not to appear at the hearing.</p> <p>As such, no changes are required as a result of this submission.</p>
67.2	Selwyn District Council - Lisa Arnott	SDC supports the use of biological plant pest control initiatives. SDC considers that there has been good progress made in recent years in research and trials of biological controls, and that it is important to continue to utilise to progress these types of pest control methods.	<p>Support</p> <p>Amend the RPMP to ensure that biological plant pest control initiatives continue to be utilised to progress these types of pest control methods.</p>	Reject	<p>We accept the Council's position that specific reference to biological control is not necessary, and that this sits outside the RPMP.</p> <p>As such, no changes are proposed as a result of this submission.</p>

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67.5	Selwyn District Council - Lisa Arnott	Selwyn District Council supports adjoining land owners being fully responsible for plant pests on road reserves.	Support  No specific decision requested	Accept in part	Refer to submission 90.17.
72.7	Waimakariri District Council - Geoff Meadows	The monitoring objectives set out in table 32 on pages 68-70 are sensible and practical. This Council has an interest in the proposed operational plan that is to be prepared within three months of the commencement date of the Plan, and in the report on the operational plan each year.	No specific changes requested	Accept	Accepted to the extent that the provisions and changes agreed to have been addressed in other parts of this decision.
72.8	Waimakariri District Council - Geoff Meadows	The analysis of costs and benefits by pest types as set out in Table 31 in pages 76-80 provides a sensible overview of the analysis of costs and benefits undertaken. The assessment of the effects on the environment in section 9.3.2 is a little light, and could do with some more in-depth description of the environmental benefits to Canterbury that will flow from implementing the Plan.	Amend provisions in the PRPMP to provide more in-depth description of the environmental benefits	Accept	While the submission is acknowledged, no specific relief is included in this submission summary.

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73.1	Ministry of Education - Jess Bould	<p>Environment Canterbury has outlined that it will be undertaking most of the upfront work on the site-led programmes. The Ministry would appreciate it if further details of this “upfront work” can be provided. Although this level of detail may not be necessary for the Proposed Plan, it would be beneficial for the Ministry (as the landowner) and the two schools (as the occupiers).</p> <p>The Ministry, Governors Bay School and Omarama School would like to be fully informed of any pest management procedures on or near to the school sites. This is so that the potential effects of these procedures (such as spraying) can be fully considered, particularly in relation to the safety of students.</p> <p>The Ministry wishes to work with Environment Canterbury to ensure that these programmes are successfully carried out. Both schools have however indicated to the Ministry that given the financial constraints they operate under the potential financial implications to the two schools of having to maintain and undertake site-led programmes will have to be considered in any works.</p>	<p>Amend the RPMP to provide further details of this "upfront work", ensure that the Ministry and the schools are fully informed of pest management procedures on or near to the school sites. This is so that the potential effects of these procedures (such as spraying) can be fully considered, particularly in relation to the safety of students. Financial implications for the schools to maintain and undertake site-led programmes also will have to be considered in any works.</p>	Reject	<p>While the submission is acknowledged, this matter sits outside the RPMP.</p>
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# Proposed Regional Pest Management Plan

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75.9	Te Runanga o Ngai Tahu - Ryan Hepburn	<p>It is important that pest management techniques involving chemical, biological, and any other means to contain or eradicate a pest are done to best management practice. To avoid compromising water quality, applications must consider suitable climatic conditions, not be made directly to water, and have a suitable buffer zone between the point of application and any waterways. Additionally, 'best management practice' is a concept that should not remain static, rather, it should constantly be revised and improved to stay up to date on the latest technological and scientific advancements.</p> <p>Lastly, we request Environment Canterbury adopts a policy of erring on the side of caution when the risks and effects associated with a particular element of pest control are not known.</p>	Insert provisions in the RPMP to ensure that best management practice is used, and that a precautionary approach is applied.	Reject	Refer to submission 75.6.
78.8	Department of Conservation - David Newey	The Director General supports the inclusion of Good Neighbour Rules for the species listed. These are rules that bind Crown agencies. Good Neighbour rules must align with the Biosecurity Law Reform Act 2012 and the National Policy direction which has accompanying guidance material. We do not agree rules for Bennetts wallaby and Nassella tussock meet good neighbour rule requirements. The Director General seeks additional rules for wilding conifers.	<p>Support in part</p> <p>Amend proposed rules to include a distance that meets the requirements of the National Policy Direction. We suggest a 20m boundary distance for Nassella Tussock, and a 1km boundary distance for Bennetts wallaby. The 1km distance is consistent with the document provided as supporting the proposed plan and is titled "Meeting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits. Additional rules for wilding conifers will be addressed in other sections of our submission further on.</p>	Accept in part	<p>We accept the Council and Department of Conservation's evidence that a 1 kilometre boundary rule is used for the Bennetts wallaby Good Neighbour Rule.</p> <p>We note that other parts of the DOC submission sought a 50m GNR rule and staff recommended a 100m setback to provide for wind dispersal for seed. We consider the 100m setback to be appropriate.</p>

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88.5	Forest and Bird - Jen Miller	<p>This section acknowledges the value of the work of these committees and seeks to continue to 'work with stakeholders and communities'.</p> <p>However it is vaguely worded. It would appear that the only opportunity for some significant stakeholder interests to assist the committee and Council is by invite, i.e. being co-opted on. For example Iwi, DOC and conservation groups such as Forest and Bird.</p> <p>Given the amount of pest work done by the latter two their absence, if not co-opted would seem a missed opportunity to improve collective approaches to pest management.</p>	<p>Support in part</p> <p>Amend the section 5.5 to ensure there is a clear path to committee membership for stakeholders with a significant interest in pest work, other than rural ratepayers such as a designated place for DOC, Iwi and groups like Forest and Bird. An other option might be the provision of the opportunity for groups to be invited to apply to be members of a committee.</p>	Reject	<p>While the submission is acknowledged, this matter sits outside the RPMP. Refer also to submission 79.9.</p>
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# Proposed Regional Pest Management Plan

## Summary of Submissions and Panel Decisions

Requests for additional pests					
Number	Name	Submission	Relief	Decision	Reasons
5.1	Davies, Mike	Steps need to be put in place to eradicate feral cats.	Insert provision to eradicate feral cats.	Reject	<p>Having considered the evidence presented on cats, we consider that they are appropriately identified as organisms of interest. We anticipate further work in the Canterbury region on the impact of feral cats, and methods to control them. Submitters are encouraged to identify specific areas for site led programmes and discuss these with the regional council.</p> <p>No changes are recommended as a result of this submission.</p>
5.3	Davies, Mike	<p>The pest management needs to include the following,</p> <ul style="list-style-type: none"> <li>It is illegal to release cats into the wild.</li> <li>Householders are permitted a maximum of two desexed cats.</li> <li>The only people to have non desexed cats are registered breeders.</li> <li>All cats to wear a collar with a bell. All cats to be kept inside at night.</li> </ul> <p>My reasons for this is the number of feral cats I shoot around my house (rural style no life block) every year. The worst year I destroyed 40 cats and have averaged between 5 and 10 cats a year for the last 31 years</p>	Insert provisions that will make it illegal to release cats into the wild and put conditions on domestic cats.	Reject	<p>We accept the Council's position that it does not have the resources to control feral cats or manage domestic cats as a pest agent at this stage.</p> <p>We also recognise that if controls on domestic cats, as a pest agent, were to be included in the plan, the better course of action would be to notify a change to the RPMP, and undertake the full consultation steps in the plan. This is because a significant portion of the community would be impacted by such a proposal, and a more detailed and focussed cost benefit analysis would be required.</p> <p>No changes are recommended as a result of this submission.</p>
13.1	Beatson, Judith	Cats should be included in the pest plan. At a minimum feral cats should be included because of the damage they inflict on bird life. Personally I believe there should be controls in place for domestic cats regarding the maximum number of cats per household and the uncontrolled wandering of these cats. In many places in the world domestic cats are household cats not neighbourhood cats and they live contented lives. Why not also add some controls on Canterbury's domestic cats and give with wildlife in urban areas a chance.	Insert provisions for control of cats in the pest plan including the maximum number of cats per household and the uncontrolled wandering of these cats.	Reject	Refer to submissions 5.1 and 5.3.

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13.2	Beatson, Judith	See submission point 8.1	Alternative relief if sought in point 8.1 is not granted, insert feral cats to the Ecan pest plan.		Refer to submissions 5.1 and 5.3.
45.1	Predator Free New Zealand Trust - Rebecca Bell	<p>Pest management is important for biodiversity reasons as certain pests have a significant impact on our native species. Declaring feral cats, mustelids and rats as organisms of interest rather than pests does not show regional leadership for predator control. Organisms of Interest don't have a clear plan on how these will be managed. We believe feral cats, mustelids and rats should all be included in the RPMP as site-led pests. These predators have a catastrophic effect on our native birds, lizards and other animals.</p> <p>We note that under 4.2 it states "Oos are not accorded pest status but future control of them could arise, for example through Site-led programmes. A review of the Plan may be necessary to include them as pests." It is almost certain that these predators will need to be (and are currently) controlled for biodiversity in certain sites around the region. We therefore would suggest to include them as pests now to save rework of the RPMP at a later date.</p> <p>In July last year the Government announced the Predator Free 2050 programme to rid New Zealand of possums, stoats and rats. The Government is seeking to support large-scale collaborative predator control projects. Canterbury has a number of sites that are potential projects and we encourage ECAN to help support large scale predator control projects. Including feral cats, mustelids and rats as pests in the plan helps support this. Feral cats require a clear definition for any cat control to occur. Cats are the one pest that are also a common pet. Therefore it is necessary to be able to tell the difference between an owned cat and an unowned cat. We suggest the addition of a definition. A suitable definition would be "a feral cat is a cat without a microchip, collar or harness." This would allow cat control to occur near populated areas without the risk of harming any owned cats. Not only are cats a biodiversity pest they are a primary production pest spreading toxoplasmosis to sheep. Farmers currently immunise their sheep but immunisation is not 100%</p>	Insert provisions in the RPMP to include feral cats, mustelids and rats as site-led pests.		Refer to submissions 5.1 and 5.3.

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		effective and “toxos storms” can still infect flocks resulting in a significant loss of livestock and foetuses.			
47.1	Morgan Foundation - Jessi Morgan	<p>The Morgan Foundation are concerned that most biodiversity pests have been removed as pest from the proposed plan and have been reclassified as Organisms of Interest.</p> <p>Specifically a feral cat should be defined as any cat without a microchip, collar or harness. This would allow cats to be legally managed in sensitive wildlife areas, particularly those near populated areas. Currently there is no definition of a feral cat in the plan. This means there is no way to tell if a cat is owned or not and means that feral cats cannot be controlled in sensitive wildlife areas, especially those near settlements.</p> <p>Wandering cats have an impact on native biodiversity through the predation of native birds, reptiles and insects. Regional Councils have a responsibility to provide leadership in protecting our biodiversity and ECAN need to include relevant biodiversity pests in their plan.</p>	Insert provisions to include feral cats in the plan as a site led pest.		Refer to submissions 5.1 and 5.3.
47.2	Morgan Foundation - Jessi Morgan	See submission point 47.1	Insert provision to define feral cats as any cat without a microchip, collar or harness.	Reject	As the Panel has not accepted the microchipping of domestic cats, the defining feral cats in this manner is not appropriate. As an organism of interest, we are satisfied that the plain meaning of the terms is sufficient, and feral is defined in the glossary of terms.
47.3	Morgan Foundation - Jessi Morgan	See submission point 47.1	Insert provisions to address cat colonies and prohibit the establishment and support of colonies. Especially near ecologically sensitive areas.	Reject	Refer to submissions 5.1 and 5.3.
53.17	Rural Advocacy Network - Jamie McFadden	Cats: The release and spread of cats continues to be a concern. Farmers in the Hurunui area are regularly seeing cats and there seems to have been an increase in the number of cats being released into the countryside recently. Cats are also commonly seen in riverbeds particularly near areas where people visit. Some regional council's e.g. Greater Wellington has feral cats listed in	Insert rule to prohibit the release of cats into the wild.	Reject	Refer to submissions 5.1 and 5.3.

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		the pest strategy and a rule that prohibits the release of cats into the wild. We support the inclusion of a similar rule into the CRPMP.			
64.5	Banks Peninsula Conservation Trust - Maree Burnett	<p>Mustelids, rats and feral cats should be added to the possum site-led Programme for Banks Peninsula if funding for that can be allocated in a fair and equitable manner. This would be consistent with the approach being adopted and considered in other parts of the country (eg Whangarei, Hawkes Bay, Auckland). The area identified as the site-led area should be extended so that it covers all the Banks Ecological Region.</p> <p>This is consistent with, and necessary to achieve, the Banks Peninsula Ecological Vision 2050. It is also consistent with the Government's predator-free New Zealand by 2050 vision. Adding these other pests to possums for Banks Peninsula is beneficial for all the reasons set out in Table 29, and is also supported by the reasons for the site-led programme set out in section 31 and Appendix B of the Economic Analysis report prepared by Mr Harris.</p>	<p>Amend table 29 on page 61 by adding the words "Mustelid, Rat and Feral cats" after "Possum" and including their scientific names.</p> <p>Insert comments in table 30 beginning on page 62 on mustelids, rats and feral cats, consistent with the description and discussion about possums.</p> <p>Amend table 31, objective 19 by including specific targets for mustelids, rats and feral cats.</p> <p>Amend the contents page of Appendix 3 on page 104 so that item 10 refers to Possum, Mustelid, Rat and Feral cat (site-led).</p> <p>Amend map 10 so that it refers to Possum, Mustelid, Rat and Feral cat.</p> <p>Amend map 10 so that the site is enlarged to cover all the Banks Peninsula Ecological Region.</p> <p>Insert provisions in the RPMP to work with Banks Peninsula Conservation Trust to consider and implement a fair and equitable funding formula for the site-led programme.</p>		<p>Refer to submissions 5.1 and 5.3 in relation to cats.</p> <p>In relation to the other species, development of further site led initiatives is the most appropriate course of action. Refer also to submission 79.7 in relation to a process to be inserted regarding inclusion of site-led programmes.</p>

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Number	Name	Submission	Relief	Decision	Reasons
22.1	Richardson, Pam	<p>I own and operate in partnership with my husband Ian and son Andrew a 670ha Banks Peninsula sheep and beef hill country property in Holmes Bay Pigeon Bay. The Environment Canterbury Regional Policy Statement significant indigenous vegetation criterion only needs one plant to be identified as significant. This is an extraordinarily high 'catch all' criteria and means that on our property every area is significant and therefore this indicates that perhaps the entire 'bush cover' on Banks Peninsula is of significant ecological value.</p> <p>Banks Peninsula has a long history of goats and damage to indigenous vegetation. In 1988 a call went out to set up a community group to eradicate goats. More recently we have had a Bank Peninsula goat working group -a partnership between Environment Canterbury, the Banks Peninsula Conservation Trust, the Department of Conservation and the Christchurch City Council. I have been involved with the Banks Peninsula Goat Eradication Programme including the development of the strategy prepared by Landcare Research in 2005 and continue to be a member of the working group today. The programme has been successful in that over 5000 goats have been eradicated over the last ten years at a cost of over \$300,000. Considerable numbers of 'volunteer man hours' have also contributed. Including goats in the Regional Pest Management Plan would be an indication that 'we mean business'.</p> <p>The Department of Conservation states that the Wild Animal Control Act is almost completely unenforceable and they do not have the resources to implement this except in a very extreme situation. This cannot be relied on as a broad solution for the small number of properties with feral goats. The reality is if we are to going to get rid of goats we need the policies and tools to support the eradication of goats right now. We cannot afford to lose any more ground.</p> <p>The majority of landowners are aware of and support the programme e.g. by allowing trained shooters on to their land; they understand the importance of reporting where</p>	Insert provisions in the RPMP to eradicate feral goats on Banks Peninsula	Accept	<p>We considered the evidence of the Ms Richardson and the Banks Peninsula Conservation Trust, the Department of Conservation, as well as the position of the Council on this matter. We recognise the importance of Banks Peninsula and its unique ecology, and its ongoing restoration, and that continuing investment has been made to remove feral goats from the peninsula, which puts at risk both the ecosystems of the peninsula, as well as the sunk investment into control to date.</p> <p>We heard evidence from the parties about difficulty with identification and control of feral goats under the Wild Animal Control Act.</p> <p>We find that it is both appropriate, and necessary, that domestic goats within the containment area are identified as a pest agent, and feral goats as a pest. This allows appropriate rules to be included to enable their control, with a view to eradicating them within the life of the RPMP.</p> <p>We have inserted a new plan objective 23, and new rules 6.5.1, 6.5.2 and 6.5.3.</p>

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		<p>the goats are. Landowners do understand the reasons behind eradicating the goats.</p> <p>The goat working group know where the remaining feral goats have been observed - in the remaining pockets in discrete areas across the Peninsula. The recent fires have also dispersed goats around the city boundary.</p> <p>If it is required to set up another Community Initiated Programme, going through extensive consultation to achieve the required outcome will not be easy to achieve. We would need to lead the process and have engagement with landowners a number of meetings and a submission process etc. There may not be the 'buy in' required.</p> <p>We need to build on the programme we already have in place. The earthquakes and fires etc. have impacted the work programmes over recent year's. This year's programme with funding from the DoC, Environment Canterbury and the CCC has managed to almost clear the Kai tuna area. A report of this year's operation will be available shortly.</p>			
64.1	Banks Peninsula Conservation Trust - Maree Burnett	<p>In 2016 BPCT launched the 2050 Ecological Vision for Banks Peninsula (including the Port Hills). This Vision has received widespread support from the community, conservation groups, and agencies. Comprised of eight ecological goals, the final goal "Banks Peninsula is effectively free of pest animals" seeks to reduce pest animal numbers to a level which enables indigenous species to thrive and increase, and protected forest understoreys to flourish free from grazing by exotic mammals.</p> <p>Feral goats, defined as those that are untagged and not kept behind a goat-proof fence, are a major threat to native and endemic plants, destroying both flora and fauna biodiversity.</p> <p>Herding browsers such as goats, cause two-fold damage by eating native plants and by trampling large areas of vegetation and compactable soils.</p>	<p>Insert provisions to include feral goats in the list of organisms declared as pests. Changes required are specified below</p> <p>Insert the following into table 3:</p> <p>Common name: Feral goat</p> <p>Scientific name: Carpa hircus</p> <p>Primary programme: Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)</p>	Accept	Refer to submission 22.1.



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		<p>They have strong preferences and will eat out favoured species first such as, broadleaf/papauma (<i>Griselinia littoralis</i>) and mahoe (<i>Melicytus ramiflorus</i>), before moving on to less desirable plants. Goats will also strip bark off trees and by eating young seedlings they effectively put a stop to forest regeneration. Feral goats on Banks Peninsula are able to climb bluff systems and eat the rare and threatened plants that are endemic to Banks Peninsula such as Akaroa daisy. They also damage the integrity of forest and open up routes for lesser predators to access forest, such as possums and feral cats.</p> <p>Feral Goats are a significant threat to high-value biodiversity areas on Banks Peninsula such as Hinewai Reserve, public conservation land, and Banks Peninsula Conservation Trust and QEII National Trust covenants on private land. The Banks Peninsula Conservation Trust has covenanted over 1100ha of private land with 62 covenants completed at a cost of over \$1M. Feral goats pose a significant threat to this investment in biodiversity protection.</p> <p>Banks Peninsula has many Sites of Ecological Significance, Recommended Areas for Protection, and rare ecosystems that are yet to be covenanted or protected. The impact of feral goats are highest in these areas.</p> <p>The Banks Peninsula Feral Goat Eradication Programme is implemented collaboratively by Environment Canterbury (ECan), the Department of Conservation (DOC), Christchurch City Council (CCC) and the Banks Peninsula Conservation Trust. The programme stemmed from public concern about feral goat damage to bush reserves and native plantings in the late 1980s and early 1990s, coupled with the collapse of the goat industry making them virtually worthless to farmers overnight.</p> <p>The ~500 remaining animals on private land pose a significant threat to the efforts of the programme so far. Normal fences present no barrier to feral goats, and re-infestation of previously cleaned-out areas creates significant extra work and cost.</p>	<p>Insert feral goat name details (above) into table 8.</p> <p>Insert into table 9, a description of and discussion about feral goats, consistent with the rest of the table, and consistent with the comments made in this submission.</p>		
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	<p>If feral goats are not eradicated from Banks Peninsula the remaining goats could quickly reestablish to an unmanageable level. ECan has already invested ~\$300,000 on goat eradication removing 5000 goats and goat numbers are now believed to be below 500. If the remaining goats are not eradicated the investment already made is put at risk.</p> <p>Who benefits: Banks Peninsula has become a national leader for conservation on private land with a passionate and engaged community driving biodiversity protection initiatives. The benefits of this proposal are for the whole BP community who have already worked cooperatively over a sustained period to remove feral goats from private and public land. Additionally, farmers who do not want feral goats on their properties will benefit from full eradication (see list of threats to agriculture).</p> <p>Cost: The cost of this change within the plan would be insignificant and it would serve to protect ECan's investment of \$300,000 already made on the Feral Goat Eradication Programme. (Additional investment in the programme has also been made by Department of Conservation and BPCT). The cost of not achieving feral goat eradication through the threat to biodiversity, on the other hand is significant and ongoing, and likely to be the failure of the program and the return of widespread feral goat pests across Banks Peninsula.</p> <p>Benefit Cost Ratio: The benefits of including eradication of feral goats on Banks Peninsula in the RPMP far outweigh the costs involved, not only to ECan but also to the wider community and the economy of Banks Peninsula. In addition to primary production, tourism is a key driver of the Banks Peninsula economy. Farmers are reliant on good neighbour rules and strong farm to farm biosecurity measures so that weeds such as gorse or diseases such as TB do not become a risk to economic viability. Conservation has also become an employer and driver in the economy of Banks Peninsula with Banks Peninsula Wool brand showcasing the conservation covenants farmers have on private land that sets them apart.</p>			
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64.2	Banks Peninsula Conservation Trust - Maree Burnett	See submission 64.1	Insert in table 10 beginning on page 29, amend Plan Objective 2 by adding after the words "... within the Canterbury Region" the words ", and within 5 years of the commencement of the Plan, eradicate feral goats within the Banks Peninsula Ecological Region as shown on Map 10 of Appendix 3.	Accept in part	Council staff supported the inclusion of feral goats in the RPMP, but with an objective to reduce numbers of goats within the first 10 years of the plan. BPCT sought eradication within 5 years. We received a number of responses from the Council on this matter. It considers that a 50% reduction in goat numbers on Banks Peninsula within 10 years is an achievable objective. We reluctantly agree, although we would strongly encourage the Council to exceed this objective if possible.
78.33	Department of Conservation - David Newey	Goats on Banks Peninsula – extensive interagency co-operation is currently occurring and including Goats as a pest agent on the Peninsula would enable another tool to be used to eradicate wild goats there.	Support in part  Insert provisions to include Goats as a pest agent in Table 29 and include an appropriate addition to Objective 19 and Appendix 3. Including the Regional Council to prepare a Cost/Benefit analysis for Goats as a pest agent on Banks Peninsula.	Accept	Refer to submission 22.1.
79.5	Christchurch City Council - Brenda Greene	We note the change in lead agency for feral goats. While DOC has powers under the Wild Animal Act, it also has powers under other legislation to control a wide range of pests listed in the Plan. Changing the lead agency creates uncertainty for a 20 year long successful programme lead by ECan in partnership with the Council and DOC. We question the need to "fix" something that is not broken.	Insert provisions to declare feral goats to be a pest, and that ECan supports DOC by providing another tool to assist in achieving the objective.	Accept in part	We accept the relief requested to insert provisions for feral (and domestic) goats in the PRMP, but agree with the Council that no change was proposed to the lead agency for feral goats.
79.22	Christchurch City Council - Brenda Greene	The Council, DoC and ECan have worked in partnership for many years reducing the extent of feral goats on Banks Peninsula and the Port Hills to protect a range of values.  We note the Department of Conservation is the lead agency under the Wild Animal Control Act 1977, but we suggest that ECan adds another tool to the methods used	Support in part  Insert provisions to include feral goats in the site-led programme, table 29, and add description from page 58 of the Canterbury Pest	Accept in part	Refer to submission 22.1.

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		<p>to prevent domestic goat escapes through a rule or a good neighbour rule.</p> <p>Feral goats are site-led within the Canterbury Regional Pest Management Strategy 2011-2015 and should remain site-led pests.</p> <p>We suggest that a rule either requires that domestic goats are marked and/or fences are maintained.</p> <p>Alternatives considered Full service delivery across the whole of the region is not considered feasible. Banks Peninsula and the Port Hills have high biodiversity values, and feral goats are in restricted distributions. Past experience has shown that relying on individual voluntary action is not effective in achieving plan objectives.</p>	Management Strategy 2011-2015 to table 30		
79.23	Christchurch City Council - Brenda Greene	See submission point 79.2	<p>Support in part</p> <p>Insert the following to table 31:</p> <p>Plan objective 21</p> <p>For the site of Banks Peninsula and the Port Hills listed in Appendix 3, sustainably control feral goats to ensure population levels do not exceed 20 per ha in order to minimize adverse effects on environmental values on Banks Peninsula and the Port Hills.</p> <p>Principal measures to be used Regulation to support the Department of Conservation under the Wild Animal Control Act.</p>	Reject	We have carefully considered this matter. We consider it appropriate to seek a reduction in the number of goats on Banks Peninsula by at least 50% in the first 10 years of the Plan.

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79.24	Christchurch City Council - Brenda Greene	See submission point 79.22	<p>Insert the following rules:</p> <p>Plan rule 6.4.13</p> <p>An occupier within the Christchurch District shall, upon receipt of a written direction from an Authorised person, ensure that fences are maintained to contain domestic goats</p> <p>AND/OR Plan rule 6.4.14</p> <p>An occupier within the Christchurch District shall, upon receipt of a written direction from an Authorised person, ensure that domestic goats have an ear tag visible from 20m or more.</p> <p>The requirement to act, service delivery and a rule described in S 53 of the proposal will be used to achieve Plan Objective 21.</p>	Accept in part	<p>Accepted to the extent that new provisions are included in relation to feral and domestic goats in the Feral Goat Containment Area – Banks Peninsula.</p> <p>Refer to submission 22.1.</p>
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Number	Name	Submission	Relief	Decision	Reasons
10.1	Te Korowai o Te Tai o Marokura - Gina Solomon	<p>Kaikoura currently has only one unwanted marine organism, <i>Undaria pinnatifida</i>. This is now spreading from the harbour area in South Bay. Canterbury hosts two other unwanted marine organisms <i>Sabella spallanzii</i> and <i>Styela clava</i> which are both known to present in Lyttleton Harbour. These may be present in other locations, but the Council has commissioned no surveys for marine organisms. The only data are from NIWA port surveys conducted for the Ministry for Primary Industries.</p> <p>Other harmful marine organisms already present in New Zealand include the Asian paddle crab, the Australian sea squirt <i>Pyura doppleganera</i>, and the droplet tunicate <i>Eudistoma elongatum</i>. Locations with these organisms are connected to Canterbury and to Kaikoura through pathways mediated by vessels, and by marine farming and fishing activities. Other regional councils have made provision for marine biosecurity. In the benefit/cost analysis for Northland benefits exceeded costs at a rate for more than 8 to 1. With a million tourists a year historically coming to Kaikoura for its marine environment, it is hard to imagine that a similar benefit ratio would be achieved for a substantial marine biosecurity programme here.</p>	<p>Oppose</p> <p>Insert provisions for Control of <i>Undaria pinnatifida</i>, which is now spreading in the Kaikoura marine environment.</p> <p>This would involve:</p> <ol style="list-style-type: none"> <li>1. A delimitation survey to identify the limit of spread;</li> <li>2. Regulation of vessels to require hulls to be clean of <i>Undaria</i>;</li> <li>3. Preventing of further marine dumping of <i>Undaria</i> contaminated materials;</li> <li>4. Control in new nodes using techniques developed in Fiordland.</li> </ol>	Accept in part	<p>We appreciate the issues raised by the submitter in relation to marine pests and this has highlighted a gap in our knowledge.</p> <p>As part of our recommendation to Council, we consider it important that we emphasise the need to improve the regional council's knowledge in relation to marine pests, and that a work programme is undertaken both for Kaikoura and the Banks Peninsula areas.</p> <p>We are encouraged that staff have indicated they will work with Te Korowai o te Tai o Marokura to enable this to happen.</p>
10.2	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 10.1	<p>Oppose</p> <p>Insert provisions for the Control of <i>Sabella spallanzii</i> and <i>Styela clava</i> where they are present in the region, and exclusion of these harmful organisms from the Kaikoura marine environment.</p> <p>This would involve:</p> <ol style="list-style-type: none"> <li>1. Assessment of current nodes of infection (if they have spread beyond Lyttleton);</li> </ol>	Reject	Refer to submission 10.1.

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			<p>2. Regulation of vessels entering or moving in the region to require that they are free of these pests (using the Northland Regional Council provisions as a model);</p> <p>3. Regular inspection of South Bay and Kaikoura moorings for these pests.</p> <p>4. Incident response.</p>		
10.3	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 10.1	<p>Oppose</p> <p>Insert provisions for the Exclusion from the region of all other harmful marine organisms given “unwanted” status by the Ministry for Primary Industries.</p> <p>This would involve:</p> <ol style="list-style-type: none"> <li>1. Listing those organisms in the Regional Pest Management Plan;</li> <li>2. Engaging in public awareness, intelligence gathering, compliance and response activities.</li> </ol>	Reject	Refer to submission 10.1. We also note the management of unwanted organisms is a function of the Ministry for Primary Industries.
10.4	Te Korowai o Te Tai o Marokura - Gina Solomon	See submission point 14.1	<p>Oppose</p> <p>Insert provisions for surveillance, public awareness, intelligence, compliance, and networking to reduce marine biosecurity risks.</p>	Reject	Refer to submission 22.1 and 10.3.

# Proposed Regional Pest Management Plan

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20.14	Marlborough District Council - Jono Underwood	<p>There is an absence of any commentary, or potential programmes, that give affect to the Environment Canterbury's role in fulfilling its responsibility outlined within the Pest Management National Plan of Action for marine pests.</p> <p>Marine pests such as Sabella spallanzanii and Styela clava are known to be established in the waters of Lyttleton Harbour. There has been decisions made, by the Ministry for Primary Industries (formerly MAF Biosecurity NZ) that eradication of these species will not be attempted nationally. As such, as outlined in the Pest Management National Plan of Action, the regional council is to take a lead role in coordinated decision making. It is not clear either within this Proposal, nor elsewhere, how Environment Canterbury intends to deliver this lead intervention and decision-maker role.</p> <p>There are links between the Canterbury and Marlborough marine environments primarily via both the recreational vessel traffic and aquaculture industry. These pathways could mean the action or inaction of either MDC or Environment Canterbury can have flow-on effects on the decisions that are made in either region. There are some perceived uncertainties about the roles for pathway management (and implementation of those roles) of between central government and regional government outlined within the Pest Management National Plan of Action. This uncertainty should not preclude implementation of all the roles when the majority or regional councils around the country seem to have taken a much clearer view on the Pest Management National Plan of Action.</p>	Clarify Environment Canterbury's position with respect to fulfilling its role(s) within the Pest Management National Plan of Action.	Reject	We are unable to respond to the submission as we were not presented with evidence on this matter and Marlborough District Council did not appear in support of its submission.
20.15	Marlborough District Council - Jono Underwood	See submission point 20.14	Insert provisions to recognise the risks of the established marine pests within Canterbury, and the known links to Marlborough, MDC would like to see a degree of operational implementation for marine biosecurity occur within in the Canterbury region. This could be documented within	Reject	Refer to submission 20.14.



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			the RPMP, but could also be explained outside of this regulatory tool.		
29.2	Howard, Ted	<p>Rather than delving deeply into specifics at this late stage, I would like to see ECan engage with organisations like Te korowai o te tai o Marokura and the Kaikoura Marine Guardians to develop approaches to marine biosecurity that are as effective as possible within the constraints present.</p> <p>Flagging such an intention in this strategy may be all that is required at this stage.</p> <p>And I am very conscious of the additional stress that the earthquake has placed on many people and organisations who were already stretched thinly.</p>	<p>Insert provision in the RPMP to flag and intention to engage with organisations like Te korowai o te tai o Marokura and the Kaikoura Marine Guardians to develop approaches to marine biosecurity that are as effective as possible within the constraints present. Engagement outcomes may result in:</p> <ul style="list-style-type: none"> <li>• A Pathway Management Plan for marine areas.</li> <li>• Requests to shipping operators to dump any ballast water they may need to beyond the continental margin when safety issues make that a reasonable possibility.</li> <li>• Anchor vessels that might be carrying organisms offshore and away from reef areas where possible.</li> <li>• Have reasonable procedures to keep hulls free of invasive species, particularly for vessels coming from areas of</li> </ul>	Accept in part	Refer to submission 10.1

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			<div>known infestation of unwanted organisms (locally or internationally).</div> <ul style="list-style-type: none"><li>• The complexity of the issues we face is significant, and new technology will allow us to develop ever more effective strategies over time.</li></ul>		
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Number	Name	Submission	Relief	Decision	Reasons
6.1	Ross, Fraser Bell	sycamores are now becoming a serious problem in many bush and natural areas, throughout the South Canterbury foothills and lower country' including along several riverbeds as well. The seeds from such stands are wind blown and travel some distance away from the parent trees. Much time and effort is needed to deal with, and remove, sycamores from stands of local bush by dedicated volunteers. So a much more concerted effort is needed to control the seed source for sycamore. The propagation, sale and distribution of sycamore should be banned absolutely and included in this Plan to deal with the escalating sycamore spread on both public and private land.	Insert provisions to prohibit the propagation, sale and distribution of sycamore.	Reject	<p>We accept the Council's position that at present, there is insufficient data and information on the spread of sycamore, and its concern that given Sycamore's widespread nature, that management of it is not achievable at this stage.</p> <p>We acknowledge that staff were assisted by the evidence and further information provided by Mr Ross, with staff noting that 10 out of the 16 sites impacted by Sycamore spread included public land.</p> <p>We consider it appropriate that Sycamore is identified as an organism of interest, and that Council staff pursue both information gathering and non-regulatory responses in relation to the management of this organism.</p>
6.2	Ross, Fraser Bell	Chilean Flame creeper - this red flowered climber has become established in several natural areas on both public and private land. And is a particularly difficult weed to control and eliminate. But it does need to be controlled and eliminated, if possible and should be included in the Programme for weeds.	Insert provisions for Chilean flame creeper in the site-led programme.	Reject	<p>We accept the Council's position that this belongs in the organisms of interest list. We did not receive sufficient information on the spread or impact of the organism that would enable us to elevate its status to pest status.</p> <p>We note that in addition, provisions are included that outline the process for inclusion of site led programmes.</p>
6.3	Ross, Fraser Bell	Hawthorn: this troublesome weed is widespread in several local bush areas, including Kakahu Bush, and needs to be firmly controlled as its fruit and seeds are spread widely by birds. Much time and effort is being spent to control and limit the spread of this highly invasive plant pest.	Insert provisions to control hawthorn.	Reject	We do not agree with the elevation of this species to pest status at this time for the same reasons as set out in 6.2.
6.13	Ross, Fraser Bell	Privet has recently become established in one or our bush areas which I help maintain	Insert provision to keep it under surveillance and records to be kept of the sites where it has been found and documented for future reference	Accept	We note that Chinese privet is listed as an organism of interest and no changes are required in response to this submission.
6.15	Ross, Fraser Bell	Spanish Heath - a persistent weed on the hill country here and its spread is aided by pigs as it germinates readily on pig rooted areas. So control of wild pigs	Insert provisions to eliminate or reduce	Reject	We do not agree with the elevation of this species to pest status at this time for the same reasons as set out in 6.2.

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		should be part of the attack to eliminate or reduce this persistent weed pest.	Spanish Heath, including control of wild pigs		
6.17	Ross, Fraser Bell	"DOC's Dirty Dozen" include these if they are found in the Canterbury Region;	Insert provisions to include any organisms listed on DOC's Dirty Dozen list	Accept in part	Accepted to the extent that those species are already included in the plan as either a pest or an organism of interest. Without further evidence, we do not agree with the elevation of the remaining species to pest status at this time for the same reasons as set out in 6.2.
6.18	Ross, Fraser Bell	needle grass, nassella, pampas and other invasive grassland species need to be subject to firm control or eradication programmes;	Insert provisions to control or eradicate needle grass, nassella, pampas and other invasive grassland species	Accept in part	We accept this to the extent that provisions are already included in the plan to manage some of these species. Without further evidence, we do not agree with the elevation of other species to pest status at this time for the same reasons as set out in 6.2.
6.19	Ross, Fraser Bell	water weeds need to be included as well;	Insert provisions to control water weeds using biological control	Reject	While the purpose of the submission is appreciated, without specific details on the species and controls sought, we do not propose any changes.
6.20	Ross, Fraser Bell	rooks, feral cats, stoats and possums need continuing control. ECan is undertaking pest control work at Kakahu Bush and beyond for the benefit of the long tailed bat and native bird species generally. Such essential pest control work is fully appreciated and must be continued for the longer term to ensure the survival of many native species.	Insert provisions to ensure rooks, feral cats, stoats and possums continue to be controlled	Accept in part	Accepted to the extent that those species are already included in the plan as either a pest or an organism of interest. Without further evidence, we do not agree with the elevation of the remaining species to pest status at this time for the same reasons as set out in 6.2.  In relation to feral cats, we refer to our reasons under submissions 5.1 and 5.3.
12.6	McNeill, Steve	b) Priorities. (ii) There does not appear to be a high priority placed on mustelid and rat control across Canterbury, yet native species including ground nesting birds continue to be at risk across the region,	Oppose  Insert provisions to control mustelids and rats across Canterbury	Reject	We accept the Council's position that controlling rats and mustelids at regional scale would take considerable resources. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.  No changes are proposed as a result of this submission.
14.2	Loxton, Gavin	page 102 , Support , Inclusion of Horehound - Marriubium vulgare should be included on the observe list. This is an economically important plant to farming in the dry east coast regions of New Zealand. From 1st	Support  Insert provisions to include Horehound - Marriubium	Accept	We accept that this plant should be on the organisms of interest list.

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		July2017- July2019, a biocontrol program will be operating, to introduce 2 biocontrol agents from Australia to control horehound.	vulgar on the observe list [Organisms of Interest]		
18.1	Frank, Hermann	Sycamores ( <i>Acer pseudoplatanus</i> ) become more and more of a problem in regard to biodiversity and might become a problem in farming or forestry, too. This can be seen in many places, also outside our region like in Dunedin. They outcompete native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems, bare land. Over time they form a dense monotone structure. They also spread easily by their wind-borne seeds. They are very difficult to control when they are at the stage of trees. They would need to be included in 'sustained control programmes' and also in 'site-led programmes'.	Insert provisions to include sycamores in 'sustained control programmes' and also in 'site-led programmes'.	Reject	We accept the Council's reasons for not including this species as a pest, noting that it is included as an organism of interest. Refer also to submission 6.1.
18.8	Frank, Hermann	Stonecrop ( <i>Sedum acre</i> ): This invasive pest plant can tolerate very extreme conditions, but does not like competition by taller vegetation. This means it mostly occupies areas with dry, stony or rocky conditions. However, these places are often habitat for rare plant communities with threatened plants e.g. limestone habitats, rocky outcrops, coastal and shingle sites. As the stonecrop can form very large dense mats, it outcompetes those vulnerable plants. The species needs to be included in 'site-led' programmes.	Insert provisions to include stonecrop in 'site-led' programmes.	Reject	We did not receive sufficient information on the spread or impact of this organism that would enable us to include this species in the plan.  Site-led programmes (if regulation is identified as required) could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
18.11	Frank, Hermann	The 'Sustained Control Programme' should include sycamores as outlined above. The GNR should apply and landowners shall eliminate infestations on their land within 100 metres of an adjoining property boundary and eliminate infestations that cover up to 500 square metres in area on the land that they occupy. Rationale behind this that sycamore seeds spread easily by wind dispersion.	Insert provisions to include sycamores in the 'Sustained Control Programme', the GNR should apply and landowners shall eliminate infestations on their land within 100 metres of an adjoining property boundary and eliminate infestations that cover up to 500 square metres in area on the land that they occupy.	Reject	We accept the Council's reasons for not including this species as a pest, noting that it is included as an organism of interest. Refer also to submission 6.1.

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19.1	Ashton, Jeni	The significance of this Canterbury podocarp forest and it's decline due to plant pests needs to be addressed in the Canterbury regional management plan. I wish for the plant pests especially old man's beard and Himalayan honeysuckle to be targeted for removal in Peel Forest Scenic Reserve.	Insert provision in the RPMP to remove old man's beard and Himalayan honeysuckle from Peel Forest Scenic Reserve	Reject	We note that this species is included as an organism of interest. We recognise the Council's response that the particular site is managed by the Department of Conservation and encourage the submitter to that this up with DOC.
27.2	Taylor, R E	The pest species list must include sycamore and cotoneaster, might usefully include ash and alder in wetlands.	Oppose  Insert provisions in the RPMP to include sycamore and cotoneaster and ash and alder in wetlands	Reject	We note that some of the species are included in the organisms of interest list.  Refer also submissions 6.1.
31.1	Te Tihi o Rauhe Hanmer Springs Conservation Trust - Chris Hughey	I may have missed it but do you have Himalayan Balsam in the Canterbury Regional Pest Management Plan.  We have it here in Dog Stream, Hanmer Springs. My concern is that it will eventually make it to the Waiau River and infest all wet areas east to the sea.  We are struggling to control it.	Insert provisions to control Himalayan Balsam	Accept in part	Himalayan Balsam is included in the organisms of interest list. The Council advised that this species will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
35.2	Forest and Bird - Tony Doy	This species [Sycamore Acer pseudoplatanus] has become more and more of a problem in regard to biodiversity and might become a problem in farming and forestry, too. This can be seen in many places within Canterbury. They out-compete native plants and trees in bush areas for example, but they also colonise shrubland, short tussockland, fernland, river systems and bare land. Over time they form a dense monotone structure. They are very difficult to control when they are at the stage of trees. This is a similar situation to the wilding pines in the Mackenzie area.	Insert provisions in the RPMP to include Sycamore under 'Sustained Control' or 'Progressive Containment', in addition to that also 'Siteled'.	Reject	We accept the Council's reasons for not including this species as a pest, noting that it is included as an organism of interest. Refer also to submission 6.1.
35.4	Forest and Bird - Tony Doy	Stonecrop (Sedum acre): This invasive pest plant can tolerate very extreme conditions, but does not like competition by taller vegetation. This means it mostly occupies areas with dry, stony or rocky conditions. However, these places are often habitat for rare plant communities with threatened plants e.g. limestone habitats, rocky outcrops, coastal and shingle sites. As	Insert provisions in the RPMP to include stonecrop in 'site-led' programmes.	Reject	Refer to submission 18.8.

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		the stonecrop can form very large dense mats, it out-competes those vulnerable plants. The species needs to be included in 'site-led' programmes.			
36.1	Kennedy, Anne	<p>Tree lucerne, spur valerian and polypodium have become plant pests.</p> <p>I would like to see tree lucerne treated in a similar manner to broom.</p>	Insert provisions to control tree lucerne in a similar manner to broom	Accept in part	<p>In relation to tree lucerne, we understand that this is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest, however we consider it appropriate and concur with the staff recommendation that tree Lucerne is added as an organism of interest.</p> <p>To assist with clarity, the process for including site-led programmes is more clearly outlined.</p>
36.2	Kennedy, Anne	<p>Tree lucerne, spur valerian and polypodium have become plant pests.</p> <p>Spur Valerian has become a serious threat to the rocky outcrops and open spaces on the Port Hills and Bank Peninsula and needs to be treated in the same manner as Old Mans Beard.</p>	Insert provisions to control spur valerian in the same manner as Old Mans Beard.	Accept in part	<p>We agree to recommend adding spur valerian to the organisms of interest list.</p> <p>The Council advised that this species will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
36.3	Kennedy, Anne	<p>Tree lucerne, spur valerian and polypodium have become plant pests.</p> <p>Poly podium is also taking over the Port Hills and a method of dealing with this invasive plant needs to be found.</p>	Insert provisions to deal with poly podium	Accept in part	<p>We note that common polypody is on the organism of interest list.</p> <p>The Council advised that this species will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.</p>
39.3	Summit Road Society Inc. - John Goodrich	We want spur valerian ( <i>Centranthus ruber</i> ) and tree lucerne ( <i>Cytisus proliferus</i> ) to be added to the list of pests to be dealt with by sustained control.	Amend provisions to add spur valerian ( <i>Centranthus ruber</i> ) and tree lucerne ( <i>Cytisus proliferus</i> ) to the list	Accept in part	<p>Refer to submission 36.2 in relation to spur valerian.</p> <p>In relation to tree lucerne, we understand that this is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest, however we consider it appropriate</p>

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			of pests to be dealt with by sustained control.		and concur with the staff recommendation that tree Lucerne is added as an organism of interest.
40.1	Meridian Energy Limited - Andrew Feierabend	<p>Meridian Energy Ltd submits that Lagarosiphon Major be upgraded from a Organism of Interest (Ool) listed on page 102 in Appendix 2 of the Draft Proposal for the Canterbury Regional Pest Management Plan 2017-2037 - to a pest in Table 3 of this consultation document,pages 14-16.</p> <p>Meridian Energy considers that Lagarosiphon Major meets the current Pest Management Plan threshold for classification as a pest being: "....capable of causing adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori, there culture, and traditions and their ancestral lands, waters, sites whahi tapu and taonga.</p> <p>For consistency purposes Meridian Energy Ltd considers this approach should be adopted given that Lagarosiphon Major is listed as a pest in the Otago Regional Pest Strategy. Meridian Energy and Land Information New Zealand (LINZ) make a significant financial commitment annually to control this organism to the Waitaki Lake System. Lagarosiphon Major is managed within Lake Benmore and Aviemore currently but there is a reasonable risk that it could become more widely spread throughout the Waitaki Lake system or inadvertently spread to other natural Canterbury lake systems. This would be a major setback for lake ecology in Canterbury.</p> <p>The focus should be on containing the organism within the current boundaries of where it has spread.</p> <p>Given the significance and consequences of the spread Lagarosiphon Major in the context of the Canterbury Region it would seem reasonable that the regional community contributed to a portion of the containment costs of this introduced pest.</p>	<p>Oppose</p> <p>Amend provisions to upgrade Lagarosiphon from an Organism of Interest to the progressive containment programme, changes would need to be made to Table 11 (progressive containment), Table 32 (monitoring objectives),Table 34 (cost/benefit analysis), Table 35 ( beneficiaries and exacerbators ), Table 36 (funding).</p>	Accept	Staff agreed to inclusion of this species as a pest in the plan, and given the Council's response, we accept the changes recommended to us by the Council.
42.1	Ashburton District Biodiversity	We oppose the exclusion of Tree Lupin as a pest.	Oppose	Accept in part	We understand that this species is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest,



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	Working Group - Bert Hofmans	<p>There is no mention in the CRMP of the Tree Lupin. During the last 8 - 10 years there has been a rapid spread of this large Lupin species in the lowland rivers of the Ashburton District and it is now appearing in the higher reaches of the alpine rivers, the Rakaia and Rangitata. Tree lupin is also a weed of coastal habitats. It competes with native plants on the narrow coastal dunes, low coastal banks, dongas and gravel pits (Davis, M, 2014. Native Remnants of the Mid-South Canterbury Coast, Canterbury Botanical Society Journal 45.)</p> <p>The long lasting seed is spread as pods dry and explode, spreading seeds in the immediate vicinity. Its ability to grow in riverbeds, on sandy beaches and other difficult sites, means control is not straightforward. Immediate efforts are needed to control the spread into ecologically sensitive areas.</p> <p>Stable, weed covered islands provide cover for mammalian predators of the birds that nest on the rivers, and minimise the site selection options for endangered bird species such as Black Billed Gulls, Black fronted Terns, Banded Dotterel, Wrybill, Pied Oystercatcher, Pied Stilt and Black Stilt.</p>	Insert provisions to declare Tree Lupin a pest due to its "adverse effects on the environment" and that a Sustained Control Programme be included for high value rivers.		however we consider it appropriate and concur with the staff recommendation that tree lupin is added as an organism of interest.
42.2	Ashburton District Biodiversity Working Group - Bert Hofmans	We oppose the exclusion of False Tamarisk from the list of organisms to be controlled under a Site-led Programme. False Tamarisk is another weed of the river beds. It has not yet become widespread but has the potential to, causing similar adverse effects. Prompt action will prevent the need for expensive control measures. The seed is not long lived so timely control measures might prevent further spread and costly intervention in the future.	<p>Oppose</p> <p>Insert provisions to add False Tamarisk to the list of organisms to be controlled under a Site-led Programme.</p>	Accept in part	We understand that this species is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest, however we consider it appropriate and concur with the staff recommendation that false tamarisk is added as an organism of interest.
42.6	Ashburton District Biodiversity Working Group - Bert Hofmans	Sycamore is one of the worst threats to Ashburton District's native forest areas. Ashburton District has very small areas of remnant native forest. These remnants are under serious threat from Sycamore spread. Allowed to spread unchecked the Sycamore will eventually shade out native forest species.	Insert provisions to establish a site-led programme in consultation with Alford Landcare Inc, to determine the worst infestations, landowner responsibility and a control programme.	Reject	<p>Refer to submission 6.1.</p> <p>In relation to the specific request to work with Alford Landcare Inc we note the Council's response that this can take place outside of the RPMP process.</p>

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		<p>Sycamore is prevalent in Staveley campsite bush, Taylors Stream area (part of Hakatere Conservation Park) and Alford Forest.</p> <p>Unlike the campaign to reduce wilding pine spread where access is relatively easy on grassland, eradicating Sycamore in forested areas is much more difficult, hence the need to stop the spread now.</p> <p>Department of Conservation own most of the land that the Sycamores have spread to.</p> <p>Alford Landcare Inc. based at Staveley, has been recently been formed to co-ordinate individual programmes of pest control of animal and plant pests. It has no resources other than individual's labour. It would be willing to work in with an ECAN control program for Sycamores.</p>			
45.2	Predator Free New Zealand Trust - Rebecca Bell	<p>We are concerned that the Good Neighbour Rules do not apply to possums (Table 3, p14). We believe that a land occupier should be required to keep a minimum of 10% residual catch rate within 500m of their boundary to protect production and indigenous and biodiversity values.</p>	<p>Insert provisions for possums requiring land occupiers to keep a minimum of 10% residual catch rate within 500m of their boundary to protect production and indigenous and biodiversity values.</p>	Reject	<p>We did not receive sufficient evidence that this method is achievable and measurable. Without further information we are satisfied with the proposed provisions (as amended in relation to other submissions) at this time, and no change are proposed.</p>
50.1	Conway Flat Biodiversity Group - Peter Handyside	<p>I support the inclusion of feral pigs as Ool (appendix 2) but propose they also be included in Part 6.5 Pest to be managed under site lead programs for the Hawkswood Range. There is a big economic impact on my farming business from large feral pigs populations on neighbouring farms spilling over onto my property. . Our groups research also shows high feral pig numbers have serve biodiversity impacts (prevent native regeneration). It is reconsidered that recreational hunting does not control pig numbers. We have shown that a community approach is needed and helicopter shooting is cost effective and successful. A property occupier rate could be used to fund a helicopter shoot every 4-5 years.</p>	<p>Insert provisions to manage feral pigs in a site led programme for the Hawkswood Range</p>	Reject	<p>While we appreciate the issues arising for this submitter, we are satisfied with the Council's explanation contained in the staff narrative report accompanying the interim draft that feral pigs can be controlled under the Wild Animal Control Act. Environment Canterbury could review the need for a site-led process, and the plan more clearly sets out a process that would enable this.</p>
64.3	Banks Peninsula	<p>The impacts of feral deer on biodiversity are well known. For much the same reasons as apply to feral goats,</p>	<p>Insert provisions to include feral deer in the list of</p>	Reject	<p>We note that feral deer are to be included as an organism of interest.</p>

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	Conservation Trust - Maree Burnett	there would be great public benefit in eradicating feral deer. [See submission point 64.1]	<p>organisms declared as pests. Changes required are specified below</p> <p>Insert the following into table 3:</p> <p>Common name: Feral deer: red (including hybrids, fallow)</p> <p>Scientific name: Cervus elaphus, Dama dama</p> <p>Primary programme: Eradication (within the Banks Peninsula Ecological Region shown on Map 10 of Appendix 3)</p> <p>Insert feral deer name details (above) into table 8.</p> <p>Insert into table 9, a description of and discussion about feral deer, consistent with the rest of the table, and consistent with the comments made in this submission.</p>		This would enable site-led programmes (if regulation is identified as required) to be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
64.4	Banks Peninsula Conservation Trust - Maree Burnett	See submission point 64.1	Amend Appendix 2 on page 102 by adding the words “(outside the Banks Peninsula Ecological Region identified in Map 10 of Appendix 3”) after the references to feral goats and feral deer.	Accept in part	We agree that a change is required to ensure that clarity is provided regarding feral goats, so that plan users are aware that specific provisions apply on Banks Peninsula.
74.4	Federated Farmers - Lynda Murchison	Federated Farmers opposes the removal of ragwort, nodding thistle and variegated thistle from the proposed RPMP. These are key agricultural pest plant species with a long history of pest management regulation across New Zealand. Federated Farmers understands	<p>Oppose</p> <p>Amend provisions in the RPMP to include ragwort in the sustained control</p>	Reject	We did not receive any further evidence on the control of ragwort, nodding thistle and variegated thistle. As such, we accept the Council's response to the submission on this matter.

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		that compliance activity for these species has been relatively low in recent times, leading to their proposed removal from the RPMP. Instead of the complete removal of these species from the RPMP, Federated Farmers proposes their inclusion in the Sustained Control programme with boundary control rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint. This would remove the need for costly annual inspections but allow the continued benefit of boundary rules when required. This type of 'upon complaint' programme is successfully run in the Wellington region.	programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint.		
74.5	Federated Farmers - Lynda Murchison	See submission point 74.4	<p>Oppose</p> <p>Amend provisions in the RPMP to include nodding thistle in the sustained control programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint.</p>	Reject	Refer to submission 74.4.
74.6	Federated Farmers - Lynda Murchison	See submission point 74.4	<p>Oppose</p> <p>Amend provisions in the RPMP to include variegated in the sustained control programme, with boundary rules similar to those that are in the current RPMS. Instead of the standard inspection programme, the boundary rules could be implemented only upon complaint.</p>	Reject	Refer to submission 74.4.
74.7	Federated Farmers -	The recent incursion of velvet leaf is recognised as a considerable risk to the arable and pastoral farming	Insert provisions in the RPMP to add velvet leaf to	Reject	We accept the Council's explanation that this is currently being managed under a national incursion response, led

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	Lynda Murchison	industries of the Canterbury region. Federated Farmers is aware that the management of the velvet leaf incursion is still being run by the Ministry for Primary Industries but given the longevity of the seedbank it is inevitable that the ongoing control will become the responsibility of regional councils. Because the RPMP document lasts for 20 years, it is short-sighted not to include this species in the document. Other Regional Councils such as Waikato and Wellington have proposed to include the species despite the response still being run by MPI.	the Eradication category of the proposed RPMP, with an indication that control is currently funded and coordinated by MPI.		by the Ministry for Primary Industries (MPI), and that it is an Unwanted Organism. Not enough is known at this stage to include velvet leaf as an exclusion pest. The council will continue to work in an incursion response capacity, alongside MPI, in relation to the management of velvet leaf.
76.1	Christchurch International Airport Ltd - Kate McKenzie	<p>The risk of bird strike on an airport relates to the level and form of bird activity both within the boundary of an airport and in the surrounding areas. Birds attracted to land uses around airports can migrate onto the airport itself or across flight paths, increasing the risk of collisions.</p> <p>The population explosion [of rock pigeons] being experienced at the Airport has been exacerbated by an increase in roosting opportunities in the CBD and a significant land use change to intensive dairy farming in the Eyrewell area. The intensive dairy farming is providing substantial feeding opportunities for these pigeons, which have a preference for grain and are targeting recently sown cereal crop paddocks and also cereal silage being fed out to animals. A similar land use change is now occurring in the Canterbury Plains south of the Waimakariri River, due to recent irrigation schemes which have provided further opportunity for intensification, which explains the increased flight path variation observed at the Airport.</p> <p>It is CIAL's view that the pigeon population is widespread, and while a reduction in numbers would be ideal, the population is at a level that "sustained control" is a pragmatic management option for this species.</p> <p>CIAL considers that this species presents a significant risk to the safety of aircraft using the Airport, and it is not possible for CIAL to manage the population by itself. The management (and preferably reduction) of the population can only be achieved by proactive control by</p>	<p>Oppose</p> <p>Amend the RPMP to include Rock Pigeon under Section 6.4 of the CRPMP, as a pest to be managed under a sustained control programme.</p>	Reject	<p>We accept the Council's position that control of rock pigeons, given their transitory and widespread nature, is unlikely to be effective, as any controlled populations will just be further replaced from surrounding populations.</p> <p>No specialist bird expertise was called to support Christchurch International Airport Limited's submission. It is therefore not clear what the costs of control are likely to be, or whether they are likely to be effective. No comment was made by CIAL on the workability of the interim draft.</p> <p>We acknowledge that large flocks of pigeons in the flight path of the airport could pose a safety risk. However, we encourage exploration of non-regulatory approaches to rock pigeon control, including working with the local councils and landowners to undertake control works.</p>

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		removing roosting opportunities and targeting feeding sites.			
76.2	Christchurch International Airport Ltd - Kate McKenzie	<p>Canada Geese are of particular interest to CIAL. To date there have been no Canada Geese bird strike events recorded at the Airport, however they have been recorded on the airfield and are regularly sighted at water bodies within 3 nautical miles of the airfield. There have also been a number of near strikes reported to CIAL/Air Traffic Control by pilots operating from CIA. Due to their size and flocking nature, these birds pose a significant risk to aircraft.</p> <p>CIAL is actively working with Environment Canterbury on the development of a collaborative approach to managing Canada Goose numbers in the greater Christchurch area through the development of a 'Canada Goose Management Plan'. We will continue to pursue this as a management method, however to date there has been insufficient progress with this non-statutory control method to satisfy CIAL that this will be completed in time to proactively manage the population. At the very least, this species should be recorded as an Organism of Interest, as without proactive management the population could increase considerably during the 20 year life of the proposed CRPMP.</p>	<p>Oppose</p> <p>Insert provisions in the RPMP to include Canada Goose as an Organism of Interest in Appendix 2 of the Canterbury Regional Pest Management Plan.</p>	Accept	We accept this submission for the reasons set out in CIAL's submission and the Council's response and recommend the addition of Canada goose to the organisms of interest list.
76.3	Christchurch International Airport Ltd - Kate McKenzie	In the event that the non-statutory management method currently being explored (the Canada Goose Management Plan) does not proceed before 2018, CIAL seeks that the Canada Goose is included under Section 6.3 of the CRPMP, as a pest to be managed under a progressive containment programme.	<p>Oppose</p> <p>Insert provisions in the RPMP to include Canada Goose in the progressive containment programme, subject to the Canada Goose Management Plan not proceeding before 2018.</p>	Reject	Should a change be required to add Canada geese as a pest it can be inserted by way of a review with the relevant supporting information.
76.4	Christchurch International Airport Ltd - Kate McKenzie	The Southern Black-backed Gull is a large gull which has an established population on the Waimakariri River and other braided rivers in Canterbury. The bird poses a significant risk to aircraft due to its large size (approximately 1kg compared to the much smaller and endangered Red-billed and Black-billed gulls) and the	<p>Oppose</p> <p>Insert provisions in the RPMP to include the Southern Black-backed Gull as an Organism of</p>	Reject	We accept the Council's position that it is not appropriate that this organism is listed in the RPMP in any programme, or the Organism of Interest list due to this being a native species, and also a Taonga species to Ngāi Tahu. While control may be required, this is more appropriately

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		<p>proximity of some colonies to the Airport. Southern Black-backed Gulls are also considered a pest bird by many conservation agencies because of their tendency to predate on endangered braided river birds.</p> <p>CIAL has focused control efforts on colonies on the Waimakariri River, and recently has been working with Environment Canterbury to manage these populations, and the control efforts appear to be successful in this area. This demonstrates that the species can be managed effectively through proactive and targeted control, however we are uncertain whether the species is being controlled effectively at a regional level.</p> <p>While coordinated management is successfully occurring in the vicinity of the Airport, further statutory intervention is not considered necessary by CIAL, however if management efforts were to fall away over the 20 year life of the CRPMP, the population in this area could quickly increase. This would have significant biodiversity effects, as well as posing an unacceptable risk to aircraft safety in the vicinity of the Airport.</p>	Interest in Appendix 2 of the Canterbury Regional Pest Management Plan.		managed through a site-led programme. Consultation with Te Rūnanga o Ngāi Tahu would also be required.
77.2	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part the list of organisms of interest in the Plan. LINZ however considers that there a number of other invasive tree weed species that are becoming prevalent, particularly in the Canterbury high country. These include Rowan (<i>Sorbus aucuparia</i>), silver birch (<i>Betula pendula</i>) and White Poplar (<i>Populus alba</i>). LINZ considers these species should be added to the list of organisms of interest in the Plan.</p> <p>LINZ also considers that Russell lupin should be declared as ‘pest agent’ and subject to controls in the Plan. This is addressed elsewhere in this submission. LINZ considers Russell lupin should therefore be removed from the list of ‘organisms of interest’.</p>	<p>Support in part</p> <p>Amend the list of organisms of interest in appendix 2 to include Rowan (<i>Sorbus aucuparia</i>), silver birch (<i>Betula pendula</i>) and White Poplar (<i>Populus alba</i>), and delete Russell lupin (<i>Lupinus polyphyllus</i>).</p>	Accept in part	<p>We accept that Rowan and Silver Birch are added to the organisms of interest list, which was supported by the Council.</p> <p>We also consider it appropriate to delete Russell Lupin as an organism of interest, and list Russell Lupin as a pest agent, and Wild Russell Lupin as a pest species.</p> <p>We did not receive sufficient evidence to warrant inclusion of white poplar as an organism of interest.</p>
78.3	Department of Conservation - David Newey	The Director General supports the list of organisms declared as pests. There however also needs to be a category of species that are both pests and have a commercial use. These are “pest agents”. Organisms that have a commercial use and are	<p>Support in part</p> <p>Amend provisions to include the following organisms as pest agents, Douglas fir, Bishops pine, Maritime pine, Ponderosa</p>	Accept in part	A new rule is included identifying conifers as Pest Agent Conifers in the Wilding Conifer Containment Area. We consider this to be appropriate as it provides the power to remove trees that could potentially be a seed source for wilding conifers, although not wilding trees themselves.

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		a pest should be classified as a “pest agent” to enable better inclusion and enable rules around controlling the self-seeded offspring of the pest agents. Organisms should include; Douglas fir, Bishops pine, Maritime pine, Ponderosa pine, Radiata pine, and, Russell lupin. Larch species are all invasive, we suggest pest agent status for Japanese larch and any hybrid between Japanese and European larch.	pine, Radiata pine, and, Russell lupin, Japanese larch and any hybrid between Japanese and European larch.		The provisions do not apply regionwide, only within the Wilding Conifer Containment Area.  In addition, we have weighed the use of Russell lupins as a forage crop against the impact it has on braided river systems. We have included pest agent rules in relation to Russell lupins in order to minimise their potential impact on these ecosystems.
78.4	Department of Conservation - David Newey	The Director-General submits that Brown Bullheaded Catfish are hopefully absent from the Region, however, this species is not covered by either Noxious fish or Unwanted Organism status.	Support in part  Include Brown Bull-headed Catfish (including in Table 5) recognising that the species could be deliberately spread to waterways. Such status would impose an objective of exclusion from the Region for this species.	Accept in Part	We agree with the Council, for the reasons it set out in its report, that this species be added to the organisms of interest list.
78.6	Department of Conservation - David Newey	during recent wilding conifer control work, and staff observations, several tree weed species were recorded that are becoming more prevalent invasive weeds (particularly in the high country). The Director General seeks inclusion of additional tree weed species in the Ool category.	Support in part  Amend the provisions in the RPMP to add the following tree weed species to the Ool category: Rowan ( <i>Sorbus aucuparia</i> ), and silver birch ( <i>Betula pendula</i> )	Accept	Refer to submission 77.2.
78.10	Department of Conservation - David Newey	The Director General generally supports the concept of progressive containment and strongly supports the inclusion of wilding conifers. Douglas fir is a particularly invasive wilding conifer. It is recognised as the second most invasive species after Contorta pine. The Director General supports inclusion of European larch but note other larch species are also invasive pests.	Support in part  Insert a section on Table for Douglas fir, and the other main wilding conifer species that are not declared pest organisms. The description would be for “pest agent and adverse effects”.  Add Japanese larch and any hybrid between Japanese and European	Accept in part	Refer to submission 78.3.



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			larch with pest agent status to Table 12. Include Banks Peninsula in the Progressive containment programme		
78.39	Department of Conservation - David Newey	There are other plant species which have been detected from time to time in Canterbury and which would have significant effect is they established here. Including these species as Organisms of Interest would be appropriate and cost effective.	Support in part  Amend provisions to include Senegal tea ( <i>Gymnocoronis spilanthoides</i> ) and Parrots feather ( <i>Myriophyllum demersum</i> ) in Appendix 2.	Accept	We agree with the Council, for the reasons it set out in its report, that these species be added to the organisms of interest list.
79.26	Christchurch City Council - Brenda Greene	The CRPMP, in general, has a focus on terrestrial pests and has few freshwater or marine pests. The Council, DoC and ECan have worked in partnership for many years reducing the extent of <i>Lagarosiphon major</i> over the entire site of the Christchurch Plains to protect a range of values. Long term, the range of <i>Lagarosiphon</i> can be reduced by eradicating it from the Christchurch Plains. There is potential for <i>Lagarosiphon</i> to spread from the Groynes.	Support in part  Insert the provisions to include <i>Lagarosiphon major</i> to the site-led programme, and insert the description page 75 of the Canterbury Pest Management Strategy 2011-2015 following into Table 30	Accept in part	Refer to submission 40.1
79.27	Christchurch City Council - Brenda Greene	See submission point 79.26	Support in part  Insert the following into Table 31  Plan Objective 19  For each site.....  V Wild Thyme  VI <i>Lagarosiphon major</i> to avoid,mitigate....being reduced by 50%  (vii) extent of <i>Lagarosiphon major</i> being maintained within its 2011 distribution	Accept in part	Refer to submission 40.1

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			<p>Add Appendix 5 of the Canterbury Pest Management Strategy 2011-2015 of the Christchurch Plains to Appendix 3 of the CRPMP</p> <p>Principal measure to be used.</p> <p>ECan will take a lead role in bringing about the desired levels of environmental protection on the Christchurch Plains.</p> <p>The requirement to act, service delivery and a rule described in S 53 of the proposal will be used to achieve Plan Objective 2</p>		
79.28	Christchurch City Council - Brenda Greene	The Council, DoC and ECan have worked in partnership for many years reducing the extent of feral pigs over the entire site of Banks Peninsula and the Port Hills to protect a range of values. Pigs are in a restricted distribution and can be maintained at low densities.	Insert provisions to include feral pigs in the site-led programme and insert the description from page 60 of the Canterbury Pest Management Strategy 2011-2015 following into Table 30	Reject	Refer to submission 50.1. We are further advised that the Regional Council does not have data on the 2011 distribution of feral pigs and none was provided to us.
79.29	Christchurch City Council - Brenda Greene	See submission point 79.28	<p>Insert the following into Table 31</p> <p>Plan Objective 20</p> <p>For each site....(iv) possum</p> <p>(v) extent of feral pig on Banks Peninsula being maintained within its 2011 distribution.</p>	Reject	Refer to submission 79.28.

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			<p>Principal measure to be used.</p> <p>ECan will take a lead role in bringing about the desired levels of environmental protection on Kaituna Valley on Banks Peninsula.</p> <p>Insert new map in Appendix [map shown in submission]</p>		
79.32	Christchurch City Council - Brenda Greene	<p>We assume that the purpose of including organisms of interest is because they could form the basis of site-led programmes outside of the Strategy. If so, add the following species as organisms of interest. Species are listed in order of priority. Lagarosiphon is an unwanted organism and can be contained (see above).</p>	<p>Insert the following species to Appendix 2: Sea lavender, Giant hogweed, Spur valerian, Yellow flag, Sweet reed grass, Climbing asparagus, Smilax, Grey willow, Japanese honeysuckle, Pampas, Fennel, Wallflower, Mayten, Mouse-ear hawkweed, Nodding thistle, Tasmanian blackwood, Pride of Madeira, Pigs ear.</p>	Accept in part	<p>For the reasons set out in its report, we concur with the Council's position on those species it does not recommended including in the RPMP.</p> <p>For the reasons set out in its report, we do agree to adding the following organisms of interest:</p> <ul style="list-style-type: none"> <li>• Spur valerian</li> <li>• Pigs ear</li> <li>• Chilean Mayten</li> </ul>
79.33	Christchurch City Council - Brenda Greene	<p>Late additional submission point (received 2 August 2017)</p> <p>To support the addition of pigs ear as an organism of interest, as per our existing submission</p> <p>From an aerial 2012 survey of the northern coast, pig's ear is confined to the NE bays, from Lyttelton Harbour to Le Bons Bay (see Map below). The distribution pattern appears to indicate wind dispersal from the NW, with the NW facing headlands having dense pigs ear and density reducing as spread occurs inwards towards the bay. In deeper bays, such as Port Levy and Pigeon Bay, there appears to be a possible circulation pattern that reduces the spread into the bay, and instead circulates the seed to the opposite (west) side of the bay. Pigs ear was not observed on coastal cliffs in the SW and SE sectors of Banks Peninsula.</p>	<p>Insert the following information after the Table. Pigs ear is a biodiversity and pastoral pest that is easily identified, has a known control method, and support from landowners to control its spread (Fig. 1). It impacts cliffs, a threatened environment of national importance. ECan will work in partnership with agencies and landowners to confirm the distribution of pigs ear on Banks Peninsula, and to develop a pest control programme that limits its spread.</p>	Accept in part	Refer to submission 79.32

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81.1	QEII National Trust - Alice Shanks	<p>The reason why this Chilean tree is a new weed pest in Canterbury is set out By Dr Murray Dawson in his recent article “Chilean Mayten (Maytenus boaria) – a ticking time bomb?” June 2017. New Zealand Botanical Society Newsletter 128, June 2017. We recommend that female maiten trees be eliminated and males trees adjacent areas of indigenous vegetation or restoration plantings be removed.</p> <p>The new pest plan aims to remove infestations in the early stages. Maiten is an ideal species for this new approach. If this is not achieved soon maiten has the attributes to colonise and dominate both indigenous vegetation and riparian plantings throughout Canterbury.</p> <p>The economic case can be made give the public monies and time invested in fencing covenants and planting riparian and “green-dot” sites, and the cost of control if nothing is done now.</p> <p>At the very least maiten needs to be a site-led weed to be eliminated from Banks Peninsula</p>	<p>Support in part</p> <p>Insert maiten (Maytenus boaria) to the RPMP as a Progressive Containment Pest species so that female trees can be eliminated and thus the spread contained.</p>	Accept in part	<p>We accept the Council's position that Chilean mayten be added to the organisms of interest list, as the extent and distribution of mayten is not currently known.</p> <p>We note that in addition, provisions are included that outline the process for inclusion of site led programmes.</p>
81.2	QEII National Trust - Alice Shanks	See submission point 81.8	<p>Support in part</p> <p>Alternative relief if that sought in point 81.8 is not granted, include maiten as a site-led weed to be eliminated from Banks Peninsula.</p>	Reject	Refer to submission 81.1.
81.5	QEII National Trust - Alice Shanks	Cotoneaster species are increasing across dryland, limestone and open shrubland ecosystems, all much reduced from their 1840 original cover and now rare in Canterbury. It is a bird-dispersed berry so the increase in birds through predator-control programmes is likely to increase the success of this species at dispersal and establishment. The cost of control is less at this time in its expansion.	<p>Support in part</p> <p>Insert all cotoneaster species to the list as Sustained Control species.</p>	Reject	We accept the Council's position that Cotoneaster is widespread throughout Canterbury and it would not be possible to achieve a sustained control objective. Wild cotoneaster has been added to the organisms of interest list.

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81.7	QEII National Trust - Alice Shanks	<p>Late additional submission point (received 31 July 2017)</p> <p>Miles and I wish to expand on our submission at the hearings and speak about the pathways to contain new and emerging weeds (nipping them him the bud) eg hawthorn, mayten, Chilean glory vine, garden escapes pigs ear, cockatoos, willows, and policy around collaboration with other agencies like Doc. And giving effect to the NPPA.</p>	Amend the RPMP to ensure pathways for containing new and emerging weeds (eg hawthorn, mayten, Chilean glory vine, garden escapes pigs ear, cockatoos, willows)	Accept in part	<p>While we received additional information on these organisms, we did not have sufficient information to add them as pests. We note that all of those species except for willow are recommended to be listed as organisms of interest. We accept the Council's position on those species.</p> <p>We have included greater clarity around the process for consideration of site-led programmes.</p>
83.1	Air New Zealand Incorporated - Captain David Morgan	<p>Christchurch International Airport Ltd (CIAL) is actively working with Environment Canterbury on the development of a collaborative approach to managing Canada goose numbers in the greater Christchurch area. CIAL has advised Air New Zealand that it is registering its interest of having Canada Geese included in the Canterbury Regional Pest Management Plan Review.</p> <p>Air New Zealand is aware of the increase in Canadian Geese and Rock Pigeon numbers within the Canterbury Region, Christchurch and the environs of Christchurch Airport.</p>	Insert provisions to include Canadian Geese and Rock Pigeon in either progressive containment or sustained control	Reject	Refer to submissions 76.2 and 76.1.
83.2	Air New Zealand Incorporated - Captain David Morgan	See submission point 83.1	Alternative relief if that sought in point 83.1 is not granted, Air New Zealand recommends that these species are classified as an organism of interest by including these species in appendix 2 of the Proposal for the Canterbury Regional Pest Management Plan 2017 – 2037.	Accept in part	Refer to submissions 76.2 and 76.1.
86.1	Port Hills Trust Board and Mt Vernon Park Management Committee -	<p>Our submission relates 6.4 Pests to be managed under sustained control programme</p> <p>We would like you to amend the list of species required to be cleared to within 10m of a boundary under the Good Neighbour rule to include additional species.</p>	Insert provisions to include boneseed, banana passionfruit and tree Lucerne in the sustained control programme, with a Good Neighbour Rule	Reject	We accept, for the reasons set out in the staff report, that additional rules on these species would not be effective at avoiding seed spread, given the characteristics of the plants.

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	Howard Keene	<p>Specifically in out case we would like it to include boneseed, banana passionfruit and tree Lucerne. It may be necessary to include other species in other areas.</p> <p>As an example we have spent many days clearing a boundary, but the unoccupied land upslope is a dense thicket of numerous weed species. To require the absentee neighbour to clear only gorse and broom to within 10m of the boundary goes only part of the way to help prevent a complex weed reinvasion of our land from above.</p>	requiring the species to be cleared within 10m of a boundary.		We note that site-led programmes could be considered. In addition, provisions are included that outline the process for inclusion of site-led programmes.
88.1	Forest and Bird - Jen Miller	Sycamore Acer pseudoplatanus has become an increasing problem Its spread in the Canterbury foothills has the potential in the near future to be of significant biodiversity concern. Sycamore can smother and out-compete native plants and is difficult to remove once established. It is Forest and Bird's view that within the life of the Strategy Sycamore will become a considerable pest and needs to be added to the pest organisms list.	<p>Support in part</p> <p>Insert provisions in the RPMP to manage Sycamore under the sustained control programme (add to table 3 and section 6.4)</p>		Refer to submission 6.1.
88.2	Forest and Bird - Jen Miller	<p>In the last 10 years there has been an alarming spread of Tree Lupin in lowland river beds throughout Canterbury and it is now appearing in the higher reaches of the alpine rivers, the Rakaia, and Rangitata.</p> <p>Tree Lupin in braided rivers contributes significantly to the stabilisation of islands within the river. This affects the natural movement of shingle, a vital feature of braided river ecosystems. Stable, weed covered islands provide cover for mammalian predators of the birds that nest on the rivers, and minimise the site selection options for bird species such as Black Billed Gulls, Black fronted Terns, Banded Dotterel, Wrybill, Pied Oystercatcher, Pied Stilt and Black Stilt.</p>	<p>Support in part</p> <p>Insert provisions in the RPMP to include tree lupin in site-led programmes for biodiversity protection, in particular to maintain suitable breeding habitat for threatened river bird species such as black billed gull, wrybill, black fronted tern, pied and black stilt and banded dotterel.</p>	Accept in part	We understand that this species is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest, however we consider it appropriate and concur with the staff recommendation that tree lupin is added as an organism of interest.
88.4	Forest and Bird - Jen Miller	Other than the concern that Wild Russell lupin is not being considered a pest organism the Ool is supported. The ability to be able to review the Plan if future control for species on the list is required is also supported.	<p>Support</p> <p>Retain provisions in the Organisms of Interest as worded</p>	Accept in part	Accepted except to the extent that new provisions for Russell lupin and wild Russell lupin are proposed, and other modifications made to the organisms of interest list.

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88.6	Forest and Bird - Jen Miller	<p>Myrtle rust (<i>Austropuccinia psidii</i>) has been found in Northland, Waikato, Bay of Plenty and Taranaki.</p> <p>Given that it would appear to be case that the fungus is able to be carried by strong winds and the likelihood of increased significant weather events capable of carrying the spore it would seem prudent to add myrtle rust to Table 5.</p>	<p>Support in part</p> <p>Insert provisions in the RPMP to include Myrtle rust in the exclusion programme</p>	Reject	<p>We accept the Council's explanation that this is currently being managed under a national incursion response, led by the Ministry for Primary Industries (MPI), and that it is an Unwanted Organism. Not enough is known at this stage to include Myrtle rust as an exclusion pest. The council would work in an incursion response capacity, alongside MPI, should any incidence of Myrtle rust be identified.</p>
90.3	Johnstone, Robert	<p>There is no place for goats on hill country if they have access to G&amp;B seed heads. My neighbour's once clean tussock higher slopes is now infested in broom caused by escaping goats</p>	<p>Amend the RPMP to ensure that goats are controlled in the hill country</p>	Reject	<p>While we have provided for control of feral goats on Banks Peninsula, we do not have sufficient information on goats in the hill and high country to include them as a pest. We do note that outside of Banks Peninsula, they proposed for inclusion as an organism of interest.</p>
90.6	Johnstone, Robert	<p>The subdivision of the various pests into one of the 5 programmes seems to be pretty much a continuation of previous policy and is sensible and supported but I do not see Nodding Thistle mentioned. This is a mistake and this thistle should be put back on the list particularly if the region (or the property) has a history of small seeds production.</p> <p>That they got away in South Canterbury is really a reflection on the policy of 40 metres from the boundary or road or river and lack of proper enforcement that was undertaken. The weevil is I understand having some effect but it will never exterminate them</p>	<p>Insert nodding thistle on the pest list</p>	Reject	<p>Refer to submission 74.4. We accept the Council's explanation that there are a very low numbers of complaints regarding the boundary control of nodding thistle, it is very widespread and being effectively managed by occupiers to prevent adverse impacts on production values.</p>
90.7	Johnstone, Robert	<p>I believe that Burdock should be included in the sustained Control Category. It is a prolific seeder, deep rooted and can get easily established around yards hay barns, sheep camps etc.</p>	<p>Insert burdock in the sustained control category</p>	Reject	<p>We understand that this species is widespread in Canterbury. We did not receive enough information on this species and its impacts to warrant including it as a pest, however we do note that is recorded as an organism of interest.</p>
90.8	Johnstone, Robert	<p>Blackberry seems to be omitted as well. What is the reason? It is widespread, or is it too wide spread to cope with? Serious consideration should be give to including this plant.</p>	<p>Insert blackberry on the pest list</p>	Reject	<p>We understand blackberry is very widespread, and it would not be achievable to manage it effectively across the region. Blackberry is listed as an Organism of Interest and will be watch-listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be</p>

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					protected, objectives for the programme, and consideration / consultation on funding arrangements is provided.
90.15	Johnstone, Robert	<p>Meulambeccia There are many varieties, mostly indigenous. This plant is as voracious and devastating to both native and exotic forests, woodlands and gardens - --arguably much worse than OMB .. It is not on any radar simply because it is an indigenous plant and therefore has special status!.</p> <p>The strategy should be consistent include Meulambecia along with OMB or delete both . ---They are of equal menace . The fact that one is indigenous is quite irrelevant in my view.</p>	Insert Meulambeccia in the RPMP, consistent with old man's beard.	Reject	Meuhlenbeckia spp. are a native plant and are not appropriate for consideration as a pest species.



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Number	Name	Submission	Relief	Decision	Reasons
7.1	BRaid - Sonny Whitelaw	braided rivers are the only ecosystem in the ten broadly targeted areas to have its own set of targets in the Canterbury Water Management Strategy. One of the CWMS targets under 'Natural Character of Braided Rivers' is to implement actions to correct the decline in useable braided river bird habitat. Populations of these bird species are at risk in good part because of introduced predators and weed species. The main invaders are broom, gorse and lupins. There is ample evidence that the Russell lupin is capable of significantly reducing the extent of the shingle areas and the multiple channels or 'braids' that wander through them, which are equally necessary for the birds adapted to feeding in their shallow margins. It is currently being sold as a fodder crop.	Re-classify Russell lupin from an Organism of Interest (p103 of the Proposal for the Canterbury Regional Pest Management Plan 2017-2037) to a Pest Organism, to prevent its sale, propagation, and distribution.	Accept in part	Refer to submission 78.26. It is accepted in part to the extent that both pest and pest agent categories have been inserted for wild and planted Russell lupin respectively.
7.2	BRaid - Sonny Whitelaw	See submission point 6.1	Alternative relief if that sought in point 6.1 above is not granted, re-classify Russell lupin from an Organism of Interest (p103 of the Proposal for the Canterbury Regional Pest Management Plan 2017-2037) to an Unwanted Organism to prevent its sale, propagation, and distribution.	Reject	Refer to submission 7.1.
7.3	BRaid - Sonny Whitelaw	A protocol for the existing use of Russell lupin needs to be well written, rigorously implemented, and equally rigorously policed so that the cost of cleaning up breaches are born by the user. This would not be hard, as the species is such an obvious plant that its spread is readily detected, its origins easily traced, and rates of invasion predictable.	Provide for a protocol to manage the existing use of Russell lupin so that the cost of cleaning up breaches are born by the user.	Reject	With Russell lupin now being identified as a pest agent and its wild form as a pest, the Biosecurity Act provides powers for management of pests and compliance with rules. We would still encourage a code of practice to be undertaken; this can sit outside of the plan.
9.1	Scott, David	Wild Russell lupin ( <i>Lupinus polyphyllus</i> ) - This species at present is not classified as a 'pest' or 'unwanted organism', but is listed under 'organisms of interest' (Appendix 2, Proposal CRPMMP June 2017). We are	Retain existing provision provisions and classifications for Russell lupin without change.	Reject	Refer to submission 78.26

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		<p>aware there may be submissions from other parties to raise it to 'unwanted organism' status.</p> <p>We ask this is not There are several reasons for not including it. These are: that 32 years of pasture trials have indicated its potential as a sheep grazing species; particularly for acid, high aluminium moist soils, under low fertiliser rates; is starting to be taken up by a few farmers; has been in the country for at least a century; has been advocated as a re-vegetation species for half a century; as an economic species for seed production for re-export; has been in the countries horticultural, as seed and plants, for more than a century; it is very much part of the cultural and landscape/tourist appeal</p>			
14.1	Loxton, Gavin	<p>Wild Russell lupin (<i>Lupinus polyphyllus</i>) - This species at present is not classified as a 'pest' or 'unwanted organism', but is listed under 'organisms of interest' (Appendix 2, Proposal CRPMMP June 2017). We are aware there may be submissions from other parties to raise it to 'unwanted organism' status.</p> <p>We ask this is not There are several reasons for not including it. These are: that 32 years of pasture trials have indicated its potential as a sheep grazing species; particularly for acid, high aluminium moist soils, under low fertiliser rates; is starting to be taken up by a few farmers; has been in the country for at least a century; has been advocated as a re-vegetation species for half a century; as an economic species for seed production for re-export; has been in the countries horticultural, as seed and plants, for more than a century; it is very much part of the cultural and landscape/tourist appeal</p>	Retain existing provision provisions and classifications for Russell lupin without change.	Reject	Refer to submission 78.26
14.1	Loxton, Gavin	<p>Page 103, support, That wild russell lupins, remain in the observe list. Report as given, in joint submission with David Scott, Lake Tekapo.</p>	<p>Support</p> <p>Retain provision for wild russell lupins in the observe list [Organisms of Interest]</p>	Reject	Refer to submission 78.26
18.6	Frank, Hermann	<p>4.1. is supported with the exception that sycamore needs to be added, preferably under 'Sustained</p>	Insert provisions to include Wild Russell lupin <i>Lupinus</i>	Accept	Refer to submission 78.26

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		<p>Control' or 'Progressive Containment', in addition to that also 'Site-led'. The species is only listed as 'Ool' in the proposal.</p> <p>Also, Wild Russell lupin <i>Lupinus polyphyllus</i> should be included in this category.</p> <p>Again, it is only listed as 'Ool', which is not sufficient for this weed species.</p>	<p><i>polyphyllus</i> should be included in this category [Sustained Control or Progressive Containment, in addition to that also 'Site-led']</p>		
29.3	Howard, Ted	<p>The other major area of concern is with braided river beds, particularly with Russell Lupins, but with large numbers of other invasive plants that can significantly affect reproductive success of many of our braided river birds and other species (insects, fish and reptiles in particular). Putting some attention to these issues, and developing effective strategies over time via engagement with all stakeholder (perhaps using the Zone Committee structure), would seem to be an effective way forward. And the development of such things typically takes about a decade, by the time people build the trust and understanding necessary to identify shared values and for successful collaboration on developing strategies to achieve shared goals.</p>	<p>Insert provisions to put attention to these issues and develop effective strategies over time via engagement with all stakeholders</p>	Accept in part	Refer to submission 78.26
35.3	Forest and Bird - Tony Doy	<p>Wild Russell Lupin <i>Lupinus polyphyllus</i> could also be included in this [site-led] category as it is also listed as 'Ool', which is not sufficient for this weed species.</p>	<p>Insert provisions in the RPMP to include Wild Russell Lupin under 'Siteled'.</p>	Accept	Refer to submission 78.26
37.1	Crowe, Max	<p>Russell Lupin (<i>Lupinus polyphyllus</i>) should be included in the Pest Management Plan as a Pest Agent.</p> <p>Experience from the Lower Ahuriri river shows that this species is an aggressive invader of braided river habitats, thereby altering river bed geomorphology and reducing the available habitat for nesting bird, including threatened species such as wrybill, black fronted tern and dotterel.</p> <p>In order to prevent the species from invading further reaches within the Waitaki District it is important that the current extent of these infestations are mapped,</p>	<p>Oppose</p> <p>Insert provisions to include Rusell Lupin (<i>Lupinus polyphyllus</i>) in the Pest Management Plan as a Pest Agent. The current extent of these infestations are mapped, and where practical that site led programmes be carried out.</p>	Accept	Refer to submission 78.26

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		and where practical that site led programmes be carried out.			
37.2	Crowe, Max	See submission point 37.1	Oppose  Insert provisions to use a progressive containment approach using the boundary and setback rules set by industry best practice to contain Russell lupin infestations (where site led programmes are not practical)	Accept in part	Refer to submission 78.26
37.3	Crowe, Max	See submission point 37.1	Oppose  Insert provisions to include <i>L. polyphyllus</i> in the Exclusion Programme, so that important areas currently free from infestation shall remain clear in the future.	Reject	Refer to submission 78.26
52.7	Ledgard, Nick	Determine the areas where Russell lupin should be included under the Exclusion Programme (no lupins present, and none allowed to enter the area, as well as controlling any that do appear).  Where Russell lupin is present (outside of the Exclusion Programme area), one of the following two approaches should be taken::  a. Site-Led, e.g. upper Rangitata (promote rules to suit current programmes)  b. Promote boundary and waterway setback rules that align with that promoted by industry  Controlling the further spread of RL should definitely not be put into the 'too hard' basket	Insert provisions in the RPMP to incorporate of points raised in Boffa Miskell / DOC submission relative to Russell lupin being treated as a 'pest agent' with Exclusion Areas. Outside exclusion areas, either treat RL under a Site Led initiative or with appropriate set-back rules.	Reject	Refer to submission 78.26
68.1	Demeter, Jane	The current proposal that wild russell lupins be on a schedule where they are classed as Objects of	Insert a rule to establish a buffer zone between	Accept	Refer to submission 78.26

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		<p>Interest (OOI) and subject to Site Management Plans is an inadequate response to a pest that is highly likely to invade high value braided riverbeds. The seeds are long lived and river-bed infestations are almost impossible to remove.</p> <p>There needs to be a buffer zone requirement, via a rule, between cultivated russell lupins and waterways where the buffer distance varies based on the significant of the waterway.</p> <p>Exclusion zones should be drawn up where there is no planting of russell lupins because of the significant biodiversity values at risk. e.g. nearby wrybill nesting.</p> <p>Classifying russell lupins as a Pest Agent with appropriate rules that include buffer requirements and exclusion zones would more appropriately manage this plant that is a pest when established in and around waterways.</p> <p>Your own document 'Analysis of Risk under NPD guidance' supports a higher level of management than currently proposed: "Some in community oppose management, overall costs are low, benefits exceed costs, impacts are known to occur, control measures are available and quality data exists"</p>	cultivated russell lupins and waterways where the buffer distance varies based on the significance of the waterway		
68.2	Demeter, Jane	See submission point 68.1	Insert new rules to establish exclusion zones where there is no planting of russell lupins because of the significant biodiversity values at risk. e.g. nearby wrybill nesting.	Accept	Refer to submission 78.26
68.3	Demeter, Jane	See submission point 68.1	Insert provisions to classify russell lupins as a Pest Agent	Accept	Refer to submission 78.26
74.9	Federated Farmers - Lynda Murchison	Federated Farmers understands that some parties have sought to have russell lupins included in the proposed RPMP. Russell lupins have been proven as a valuable fodder crop to stabilise soils in extremely harsh growing conditions such as those of the	Opposes RPMP provisions relating to the control of russell lupins, and recommends the adoption of an agreed code of	Reject	Refer to submission 78.26

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		<p>MacKenzie country. The nitrogen fixing plants are direct drilled into the soil with no tillage and grow where few other palatable plant species can survive. Lincoln University trials have shown that lupins bind fragile soils which might otherwise be blown or washed away and tolerate aluminium levels toxic to other fodder crops such as lucerne. The trials were part funded by the Ministry for Primary Industries' Primary Growth Partnership and are part of the merino company project to improve merino genetics, health and forage.</p> <p>Russell lupins are a low input fodder species which can conserve fragile soils without the use of irrigation or fertiliser - minimising their environmental impact on sensitive waterways and ground water. Federated Farmers is opposed to their inclusion in the RPMP as the species is extremely widespread and the benefits of any control or management by the Regional Council is questionable.</p>	<p>practice that sits outside of the RPMP for the responsible use of russell lupins as a cropping species.</p>		
77.7	<p>Land Information New Zealand (LINZ) - Maurice Dale</p>	<p>LINZ supports the pests to be included under sustained control programmes set out in section 6.3. However, LINZ considers that Russell lupin (<i>Lupinus polyphyllus</i>) should also be included under a sustained control programme.</p> <p>Russell lupin rapidly invades braided river systems, which reduces the available habitat of nesting river birds, including threatened species, and provides cover for predators such as feral cats and mustelids. Dense infestations also cause sand and gravel to build up, altering the morphology of rivers and contributing to flooding and erosion.</p> <p>The distribution of Russell lupin varies through the region. It is absent from a large proportion of the upper catchments, but particularly prevalent in the mid catchment areas where it is easily spread. Russell lupin is also commercially planted as a fodder crop, and cultivated to produce seed for export, and the ornamental plant industry. LINZ spends significant funding on controlling Russell lupin in the Tekapo</p>	<p>Support in part</p> <p>Insert Russell lupin (<i>Lupinus polyphyllus</i>) as a 'pest agent' to the list of pests to be included in a sustained control programme in table 14, and include a description of the Russell lupin and its adverse effects to section 6.4.</p>	Accept	Refer to submission 78.26

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	<p>River and Lake Pukaki shoreline to protect biodiversity values.</p> <p>LINZ considers that Russell lupin should be included in the Plan under a sustained control programme that precludes its establishment in those parts of the region where it does not exist, and requires sustained control elsewhere within a defined containment area with associated boundary and good neighbour rules.</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"><li>• The recently proposed New Zealand's Threatened Species Strategy. Braided riverbeds are important habitat for 3 species named in the 150 species of priority threatened and at-risk species. These are black stilt, wrybill and robust grasshopper. Russell lupin provides cover for predators as well as physically invading and eliminating habitat used by these species.</li><li>• There are new proposals to make large areas of the Mackenzie Basin predator free in line with the Predator Free 2050 programme in order to protect threatened species. Spread of lupin would undermine this work and add costs.</li><li>• The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places, she highlights the impacts of Russell lupins on threatened native bird species.</li></ul> <p>The planting of Russell lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, LINZ supports its inclusion as a 'pest agent' in the Plan which enable its planting for commercial use within the defined containment area, but require their wilding progeny outside of plantations to be controlled. In this way, it would be similar to the approach taken to some commercial conifer species in the Plan, such as pinus radiata and Douglas fir.</p> <p>The exact distribution of Russell lupin in the region is uncertain, and therefore the extent of any preferred</p>			
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# Proposed Regional Pest Management Plan

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		<p>containment area has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.</p> <p>An alternative approach to its inclusion in a sustained control programme may be to declare Russell lupin a pest organism in the Plan, with exemptions granted by a Chief Technical Officer for limited plantings to be carried out with conditions. If spread continues or landowners do not meet conditions the exemption would be removed. Such conditions could include no planting within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.</p> <p>In addition to its inclusion under a sustained control programme, LINZ supports the inclusion of Russell lupin in a site led programme for the upper Rangitata and Rakaia catchments. This is addressed elsewhere in this submission.</p>			
77.8	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Insert a new objective in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>Over the duration of the Plan:</p> <p>(i) preclude the establishment of Russell lupin populations in the Canterbury region outside of the Russell lupin containment Area to</p>	Accept in part	A new objective has been drafted which reflects the drafting proposed by LINZ, but with editing changes.



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			<p>prevent adverse effects to environmental values.</p> <p>(ii) sustainably control Russell lupin to preclude land presently free of, or being cleared of Russell lupin within the Russell Lupin Containment Area (refer Map X in Appendix 3) becoming infested, and to prevent adverse effects on environmental values.</p>		
77.9	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Add new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>All occupiers outside the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate all Russell lupin infestations on land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Accept in part	A new rule 6.4.23 is proposed to control wild Russell lupin within specified distances of certain waterways. This provides a slightly different framework to that proposed by LINZ, but achieves the outcome sought specific to the impacts of lupin on braided river systems.
77.10	Land Information New Zealand (LINZ) - Maurice Dale	See submission 77.7	<p>Support in part</p> <p>Insert new rules in section 6.4 for the management of Russell lupin under a</p>	Accept	This rule will limit the impact of Russell lupin on neighbouring properties, and is incorporated into Rule 6.4.23.

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			<p>sustained control programme, as follows:</p> <p>All occupiers within the Russell lupin Containment Area as shown on Map X in Appendix 3 shall eliminate Russell lupin within 10 metres of an adjoining property boundary.</p> <p>For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>		
77.11	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.7	<p>Support in part</p> <p>Insert new rules in section 6.4 for the management of Russell lupin under a sustained control programme, as follows:</p> <p>Note: This is designated a Good Neighbour Rule</p> <p>All occupiers within the Russell lupin Containment Area shall on receipt of a written direction from an Authorised Person, eliminate Russell lupin infestations on their land within 10 metres of the adjoining property boundary where the occupier of the adjoining property is eliminating</p>	Accept	Refer to submission 77.10. This is incorporated into Rule 6.4.24.

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			<p>Russell lupin infestations within 10 metres of that boundary.</p> <p>For the purposes of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p>		
77.12	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.7	<p>Support in part</p> <p>Amend Appendix 3 Maps, by including map of new Russell lupin Containment Area (DOC and LINZ to supply maps prior to hearing) and make any other consequential changes needed to the plan to address this submission point [submission point 77.7].</p>	Reject	Rather than relying on specified areas, the Russell lupin rules apply region-wide in rural zoned land.
77.23	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports the site led programmes set out in section 6.5. However, LINZ considers that Russell lupin (<i>Lupinus polyphyllus</i>) should also be included in site led programmes for the upper Rangitata and Rakaia catchments where it is having significant adverse effects on biodiversity values. The distribution of Russell lupin varies throughout the region. It is absent from a large proportion of the upper catchments, with the exception of the upper Rangitata and Rakaia catchments. LINZ considers a site led programme be included for the management of Russell lupin in this area.</p> <p>The exact distribution of Russell lupin in the catchment is uncertain, and therefore the extent of the area subject to any site led programme, and the goal for reduction of distribution within the first 10 years of the Plan has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of</p>	<p>Support in part</p> <p>Insert Russell lupin (<i>Lupinus polyphyllus</i>) as a 'pest agent' to the list of pests to be included in a site led programme in table 29.</p> <p>Amend objective 19 as follows:</p> <p>For each site in the Canterbury Region listed in Appendix 3, progressively control, where present:</p> <p>(i) Cathedral Bells.....</p> <p>(vi) Russell lupin</p>	Reject	<p>Russell lupin is included as a pest for sustained control. There is nothing stopping Russell lupin being managed on a site-led approach outside the plan.</p> <p>Further changes could take place if and when specific programmes are developed for site-led programmes.</p>

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		<p>Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.</p> <p>[Further detail supporting this submission point is included in submission point 77.7]</p>	<p>To avoid, mitigate or prevent damage to the specific values particular to each site.</p> <p>For each site, the first 10 years of the Plan's operation will result in the</p> <p>(i) Extent of Cathedral bells being reduced by 30%...</p> <p>(vii) Extent of Russell lupin being reduced by XX%</p> <p>(DOC and LINZ to confirm reduction goal prior to hearing).</p> <p>Amend Appendix 3 Maps, by including maps of new site led programmes for Russell lupin for the upper Rangitata and Rakaia catchments (DOC and LINZ to supply maps prior to hearing).</p> <p>Amend provisions for any other consequential changes needed to the plan to address this submission point.</p>		
78.5	Department of Conservation - David Newey	<p>The Director General supports a list of Organisms of Interest and those organisms currently on the list, except Russell lupin. The Director General seeks a greater action on Russell lupin and seeks it be declared a pest or a pest agent.</p>	<p>Support in part</p> <p>Reclassify Russell lupin as either a pest or a pest agent. Pest agent would enable rules to control wild Russell lupin as well as allow for some commercial use.</p>	Accept	<p>The Panel has recommended that Russell lupins be identified as a pest agent and wild Russell lupins as a pest.</p>

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78.26	Department of Conservation - David Newey	<p>The Director General considers Russell Lupin - <i>Lupinus polyphyllus</i> should also be included under a sustained control programme. In coming to this conclusion, we considered three recent initiatives pertinent to our submission. These are:</p> <ol style="list-style-type: none"> <li>1. The recently proposed Threatened Species Strategy. Russell lupins provide cover for predators as well as physically invading and eliminating habitat used by these species.</li> <li>2. There are new proposals to make large areas of the Mackenzie Basin predator free in line with the "Predator Free 2050 programme" in order to protect threatened species. Spread of lupin would undermine this work and add costs.</li> <li>3. The Parliamentary Commissioner for the Environment has recently released her report on native birds. In several places, she highlights the impacts of Russell Lupins on threatened native bird species</li> </ol> <p>DOC spends significant funding on controlling Russell Lupin in the Mackenzie Basin waterways, Rangitata River, Rakaia River, Waimakariri River, Waiau and Clarence upper catchments, Ashburton Lakes area and Bealey Valley to protect biodiversity values. Given the effects that it can have on biodiversity values, DOC considers that it should be included in the Plan under a sustained control programme that precludes its establishment in those parts of the region where it does not exist, and requires sustained control elsewhere within a defined containment area with associated boundary and good neighbour rules.</p> <p>The planting of Russell Lupin for commercial purposes in some areas of the region, conflicts with it being classified as a 'pest'. Recognising this, DOC supports its inclusion as a 'pest agent' in the Plan which enable its planting for commercial use within the defined containment area, but require their wilding progeny outside of plantations to be controlled. In this way, it would be similar to the approach taken to some commercial conifer species in the Plan, such as <i>pinus radiata</i> and Douglas Fir.</p>	Insert Russell Lupin, <i>Lupinus polyphyllus</i> as a 'pest agent' to the list of pests to be included in a sustained control programme in Table 14.	Accept	<p>A number of parties submitted on the matter of Russell lupins and presented evidence of their effects on braided rivers and braided river habitats. Staff supported inclusion of provisions for Russell lupin as part of the sustained control programme.</p> <p>We find that there is a significant body of evidence that outlines the adverse impact of this species on braided rivers, which occurs by populating areas of low fertility and stabilising them. The stabilisation of these areas leads to a reduction in open gravel nesting habitat for a number of rare, threatened and endangered bird species, and also provides shelter and cover for predators.</p> <p>We also heard of other areas in the Canterbury Region, where this species does not yet exist.</p> <p>We consider that while Russell lupins have a use for pastoral farming systems by providing nitrogen fixing capability in low fertility soils, the impact of the plant is such that it requires control.</p> <p>As such, we consider it appropriate that wild Russell lupins be identified as a pest, and planted Russell lupins as a pest agent, throughout the region, and include it for sustained control.</p>
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		<p>The exact distribution of Russell Lupin in the region is uncertain, and therefore the extent of any containment area has not yet been identified. DOC and LINZ are working collaboratively to identify the distribution of Russell lupin, and intend to provide supporting information prior to the hearings on the Plan.</p> <p>The Director General also recognizes the spread mechanisms of this weed species (via water and flooding, sale and deliberate spread of seed, gravel extraction and movement of contaminated gravel to new sites, dispersal via machinery and considers a Regional Pathway Management Plan may also be The Director General also recognizes the spread mechanisms of this weed species (via water and flooding, sale and deliberate spread of seed, gravel extraction and movement of contaminated gravel extraction and movement of contaminated gravel to new sites, dispersal via machinery and considers a Regional Pathway Management Plan may also be useful.</p> <p>An alternative approach may be to declare Russell Lupin a pest organism, with exemptions granted under the Biosecurity Act for limited plantings to be carried out with conditions. If spread continues or landowners do not meet conditions the exemption would be removed. Such conditions could include no planting within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.</p>			
78.27	Department of Conservation - David Newey	See submission point 78.26	Insert a description of the Russell Lupin and its adverse effects to Section 6.4.	Accept	Refer to submission 78.26
78.28	Department of Conservation - David Newey	See submission point 78.26	Insert a new objective in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:	Accept	Refer to submission 78.26

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			<p>Over the duration of the Plan:</p> <p>(i) preclude the establishment of Russell Lupin populations in the Canterbury region outside of the Russell Lupin Containment Area to prevent adverse effects to environmental values.</p> <p>(ii) sustainably control Russell Lupin to preclude land presently free of, or being cleared of Russell Lupin within the Russell Lupin Containment Area (refer Map X in Appendix 3) becoming infested, and to prevent adverse effects on environmental values.</p>		
78.29	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers outside the Russell Lupin Containment Area as shown on Map X in Appendix 3 shall eliminate all Russell Lupin infestations on land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under</p>	Accept	Refer to submission 78.26.

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			section 154N (19) of the Act.		
78.30	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall eliminate Russell Lupin within 200 meters of the closest high-water extent of large braided rivers. No planting within 50 meters of smaller streams. No planting within 10 meters of farm water courses that flow into tributaries or rivers.</p> <p>A breach of this rule creates an offence under section 154N (19) of the Act.</p>	Accept	Refer to submission 78.26.
78.31	Department of Conservation - David Newey	See submission point 78.26	<p>Insert new rules in Section 6.4 for the management of Russell Lupin under a sustained control programme, as follows:</p> <p>All occupiers within the Russell Lupin Containment Area (or specified sites) as shown on Map X in Appendix 3 shall eliminate Russell Lupin within 10 metres of an adjoining property boundary.</p>	Accept	Refer to submission 78.26.



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			A breach of this rule creates an offence under section 154N (19) of the Act.		
78.32	Department of Conservation - David Newey	See submission point 78.26	Insert a Good Neighbour rule for areas where Russell lupin is widespread. A 10m distance would be consistent with GNR for similar species such as gorse and broom.	Accept	Refer to submission 78.26.
88.3	Forest and Bird - Jen Miller	<p>Wild Russell lupin <i>Lupinus polyphyllus</i> is listed as an OoL. Forest and Bird has advocated for Russell lupin to be managed as a pest for sometime and have been particularly concerned that it has been promoted as a fodder crop within highly sensitive environments such as the Mackenzie Basin and in the upper Ashburton catchment.</p> <p>The rationale for them only being included on the OoL list is not clear. ECan has been made aware of this considerable threat to biodiversity so it is disappointing to Forest and Bird that it is not being adequately considered in the proposed strategy.</p> <p>It provides hiding places for predators of the (mostly highly endangered) birds that would usually nest safely on these bare islands. The dense infestations also interfere with water flow along these rivers, changing the ecosystem for the birds that live there. It produces large amounts of seed that are spread mainly by water, and also by humans distributing them along roadsides.</p> <p>Russell lupin is removed by DOC and others at considerable cost. As currently managed there is no ability to prevent spread by landowners.</p>	<p>Support in part</p> <p>Amend the RPMP to include Russell lupin in the site-led programme, for biodiversity protection, in particular to maintain suitable breeding habitat for threatened river bird species such as black billed gull, wrybill, black fronted tern, pied and black stilt and banded dotterel.</p>	Accept	Refer to submission 78.26.

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## Summary of Submissions and Panel Decisions

Comments specific to pest provisions					
Number	Name	Submission	Relief	Decision	Reasons
20.12	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Nassella tussock. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	Support  Retain the proposed Programme for Nassella tussock.	Accept in part	Accepted except to the extent that the provisions have been amended in response to other submissions.
25.11	Rayonier Matariki Forests - Steve Chandler	Plan Objective 15 Page 55: Support	Supports Objective 15	Accept	No changes are required as a result of this submission.
25.12	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.16 Page 56: Support	Supports Rule 6.4.16	Accept	No changes are required as a result of this submission which relates to gorse.
25.13	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.17 Page 56: Oppose in part.  Compliance with this rule is very difficult to achieve for the entire area of a plantation forest, due to accessibility and ability to detect every plant. Nassella tussock removal is feasible on forest boundaries with neighbours and internal access roads/tracks, but 100% removal is not practicable within the forest. As a forest canopy closes tussock plants are suppressed, seeding is reduced and plants may die due to lack of light.	Amend Rule 6.4.17 to require plantation forest owners to control nasella tussock on their boundaries and internal access/roads/tracks only.	Reject	We accept the Council's position that nasella tussock in this situation can be adequately dealt with by way of exemptions.
32.1	Hurunui Nassella Tussock Liaison Committee - Stewart Gibb	We wish to express concern that the status of Nassella Tussock has been changed from "progressive" control in the current strategy to "sustained" control in the proposed plan. Given the massive effort and cost of controlling this difficult pest by landowners, ratepayers, and tax payers for the past 70 or more years, we are concerned that this indicates a slackening of effort and urgency by this council.	No specific decision requested	Reject	While we appreciate the submitters concern, we are satisfied that sustained control is a realistic outcome for nasella tussock given current control methods and the record of their effectiveness.
33.1	Turnbull, Hugh	Nassella should be in progressive containment	Oppose	Reject	Refer to submission 32.1

# Proposed Regional Pest Management Plan

## Summary of Submissions and Panel Decisions

			Amend provisions to move Nassella to progressive containment		
33.2	Turnbull, Hugh	Add a later compliance date for hill country farms	Oppose  Amend Rule 6.4.16 to include a later compliance date of 14 November for hill country farms	Reject	We accept the Council redefining the areas that are subject to the two different dates.
33.3	Turnbull, Hugh	Add a later compliance date for hill country farms	Oppose  Amend Rule 6.4.17 to include a later compliance date of 14 November for hill country farms	Reject	Refer to submission 33.2
53.8	Rural Advocacy Network - Jamie McFadden	Nassella dates for completion & accompanying map. (rule 6.4.17 & Map 5 Appendix 3). Having a small number of hill country properties as an early finish date is creating confusion amongst landowners. Feedback from landowners is that the nassella map does not accurately reflect the current situation. Our submission is that all hill & high country properties are given the same finish date being 31 October.	Amend rule 6.4.17 so that all hill & high country properties are given the same finish date being 31 October.	Reject	We accept the Council's explanation regarding the need for the two dates based on property size in the hill and high country. We also consider it appropriate, for the reasons set out by the Council, that the maps be amended as outlined in its response.
53.9	Rural Advocacy Network - Jamie McFadden	Change of status for nassella. We oppose the change of nassella from Progressive to Sustained control. While holding the line maybe appropriate for gorse and broom it is not for nassella. Unlike gorse and broom, nassella has fine seed that can be spread by wind some distance onto neighbouring properties. We would like to see the momentum against nassella continued. Some properties have achieved reductions of nassella over time and this should be promoted as the goal for everyone. Holding the line provides no incentive to those landowners that have a consistently poor level of control on their nassella.	Oppose  Amend nassella tussock provisions to see the momentum against nassella continued.	Reject	Refer to submission 32.1
61.1	Bennett, Chris & Glenda	Our submission is to oppose that the Bennett property at 787 Leader Road East, Cheviot being subject to the	Amend rule 6.4.17 and Map 5 Appendix 3 to set	Accept	We accept the changes for the reasons set out in the Council's response to the submission, with a

# Proposed Regional Pest Management Plan

## Summary of Submissions and Panel Decisions

		early finish date of September 30 and that the October 31st date should apply.	the October 31st date to apply to the property at 787 Leader Road East Cheviot.		consequential amendment required for the criteria for identifying properties subject to the dates, along with amendments to the maps.
63.1	Stackhouse Farm Ltd - Adrienne Stackhouse	<p>People like myself know just how quickly this plant can spread and cover large areas of pasture leaving it not suitable for grazing. We have a common boundary with 9 vineyards and 7 lifestyle blocks and have seen tussocks spread rapidly. One lifestyle block that had a yearly grubbing of 20-50 tussocks per year, had a new lease who missed grubbing for two seasons because of not knowing about tussock, found that the block was growing over 700 tussocks per year, to grub for the following two years. This block is still producing large numbers of tussocks each year.</p> <p>On our two adjoining blocks of land – approximately 140 hectare each, each block has had a 2-hour inspection on 12 of the last 13 years. We have failed to pass inspection because we have missed a few plants and have been issued with legal non-compliance notices. Initially when we took ownership, we were grubbing approximately 10,000 plants per season – now down to approximately 2000-2500 plants. On six of the 12 years, our regrubbing required less than 20 plants to be compliant and a further 4 years less than 50 plants to comply. Surely, the inspector could grub the few plants we have missed but no, they photograph them, G.P.S. their location and send us a map telling us how incompetent we are. Yes, we have missed 1 tussock to every 6-10 hectares we own. Meanwhile our lifestyle and vineyard neighbours tell me ECan staff grub their block often grubbing 2 or more tussock per hectare. If ECan are going to control tussocks they should be inspecting every property over 500 square metres a minimum of once every 3 years.</p>	Amend the PRPMP to provide for consistency of approach to nassella, ECan should either grub the scattered tussocks that landowners have missed or treat us all the same and stop grubbing lifestyle blocks and vineyards. I would suggest that 1 tussock per hectare could be a guide for inspectors to grub. Over that density, the inspector could then issue non-compliance notices.	Reject	We accept the staff explanation that they currently apply criteria for grubbing based on the number of plants found during the inspection (i.e. takes almost no extra time to grub a very low number while undertaking the inspection), or undertake it where it would be more cost effective for the council to undertake grubbing than proceed with a formal enforcement process.
74.8	Federated Farmers - Lynda Murchison	Federated Farmers recommends a standardisation of the control inspection deadline for nasella tussock to 31 October for all properties, as opposed to 30 September for those outside the Nasella Control Zone in the proposed RPMP. A standardised date of 31 October avoids stock disturbance from nasella control and	Amend the nassella tussock provisions to standardise the control inspection deadline to 31 October for all properties.	Reject	<p>This would provide insufficient time to undertake inspections, and increased risk of spread of seed.</p> <p>Refer also to submission 53.8.</p>

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		monitoring activity during lambing and allows landowners to identify nasella more readily as it develops during the spring. This would still allow a staggered inspection period by Environment Canterbury as landowners who wish to be inspected at an earlier date could do so by arrangement. Federated Farmers notes that the zones outlined in the map accompanying the RPMP are confusing, making it difficult for landowners to ascertain which category they are in from the material provided. The criteria for being in or out of the zone is also unclear.			
77.20	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 15 and related good neighbour rule 6.4.16 seeking the sustained control of Nassella Tussock to ensure population levels do not increase. Sustained control will ensure effects of Nassella Tussock on production values are minimised.	Support  Retain objective 15, and good neighbour rule 6.4.16.	Accept	No changes are required as a result of this submission.
78.23	Department of Conservation - David Newey	The Director General has undertaken or enabled Nassella tussock control on Public Conservation land to date and intends to continue with this level of control.	Support  Retain objective 15	Accept	No changes are required as a result of this submission.
78.24	Department of Conservation - David Newey	The Director General does not agree that this rule meets the criteria of the of a good neighbour rule.	Oppose  Amend rule 6.4.16 to what would be an acceptable good neighbour rule with a suggested 50m rule distance.	Accept in part	We agree with the Council's position that a boundary distance of 100m is appropriate for the good neighbour rule 6.4.17 for nassella tussock, for the reasons set out by the Council.
82.2	Ministry for Primary Industries - Sherman Smith	Regarding the Good Neighbour Rules (GNR), the rule for nassella tussock may be inconsistent with the NPD. Under the Biosecurity Act 1993, GNR can only be used to mitigate the risk of spread to adjacent or nearby landowners, where this will cause costs to those landowners. Therefore a GNR can only apply to the part of a pest infestation that is capable of spreading to the adjacent or nearby land, and these are generally restricted to managing pests within a certain distance of the boundary with that land. A GNR would not be considered reasonable if it applied to pests that are unlikely to spread to the adjacent or nearby land.	Amend rule for nassella tussock to be consistent with the NPD	Accept	Refer to submission 78.24.

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Number	Name	Submission	Relief	Decision	Reasons
5.2	Davies, Mike	You say there are good neighbour rules and yet I have observed old mans beard increasing every year in the selywn river bed for more than 20 years.	No decision requested.	Accept	While the submission is acknowledged, no specific relief is included in this submission summary.
6.5	Ross, Fraser Bell	Darwin's barberry is a troublesome weed in Claremont Bush Scenic Reserve and needs to be controlled there.	Insert provisions to control Darwin's barberry at Claremont Bush Scenic Reserve.	Accept in part	It is noted that this species is included in the RPMP. The submitter is encouraged to follow up with the land occupier, Timaru District Council, and notify them of its presence.
6.6	Ross, Fraser Bell	Old Man's Beard: also subject to the Biosecurity Act sections 52 and 53. with Environment Canterbury having a role for advocacy, education and control. A special control or eradication focus should be on the beds of rivers where is it frequently present and can provide a seed source to infiltrate nearby stands of bush and native forests.	Amend provisions to focus on control and elimination of old man's beard, especially on the beds of local rivers within the site-led programme.	Reject	Council advise that a number of site-led programmes have been proposed for old man's beard, refer to section 6.5 of the RPMP.  No changes are proposed as a result of this submission.
6.11	Ross, Fraser Bell	Possum: this animal pest is present throughout the Canterbury Region and causes significant damage to indigenous vegetation, such as rata, and also prey on the eggs and young of native birds, in their nests. Sustained possum control is needed throughout the region, not only for animal health reasons but also to protect and enhance biodiversity, especially native wildlife.	Insert provision for sustained possum control throughout the region, either by encouraging operators or/and included within the site-led programme.	Reject	Staff note that site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements are provided.  No changes are proposed as a result of this submission.
6.12	Ross, Fraser Bell	there are many more pest organisms that need to be effectively controlled or eliminated and include, gorse, broom, rabbits, ivy, old man's beard, bell heather and Spanish heath. Where included in the Proposal the programmes, this is generally supported.	Support in part  Insert provision to effectively control or eliminate gorse, broom, rabbits, ivy, old man's beard, bell heather and Spanish heath	Reject	We accept the Council's position that the RPMP proposes to manage gorse, broom, rabbits, old man's beard and bell heather. Staff advised us that Ivy and Spanish heath are too widespread throughout Canterbury to enable effective management. Spanish heath is listed as an Organism of Interest and this will be watch-listed for ongoing surveillance or future control opportunities. We received no further evidence on these at the hearing and so we accept the Council's reasoning.

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6.23	Ross, Fraser Bell	Bell Heather - has been funded for sometime and this should continue and is supported.	Support  Support for existing approach to funding for bell heather control, no amendment sought.	Accept	No changes are proposed as a result of this submission.
12.3	McNeill, Steve	b) Priorities. (i) There does not appear to be a concerted effort to control Boneseed and Broom species across Banks Peninsula. Relaxation of effort will result in the need for expensive and ratepayer-funded solutions in the future.	Oppose  Amend the RPMP to provide for greater control of Boneseed and Broom across Banks Peninsula.	Reject	Council advised that there is an inspection programme in place to ensure the clear land remains clear of broom. Areas of boneseed outside the Port Hills / Lyttelton Containment zone are proposed to be reduced by 10 percent, and within the zone a programme is proposed to ensure that population levels do not increase. We accept the Council's position on this matter.
18.9	Frank, Hermann	Sections 5.1 – 5.5 are all supported, especially the GNR for Crown properties in 5.4. Under 'The pests subject to GNR's include Bennett's wallaby, feral rabbit, broom, gorse, old man's beard, and nassella tussock', sycamores need to be included as well (see above).	Support in part  No specific decision requested [see submission point 18.1 regarding sycamores]	Accept in part	While sycamore has been added as an organism of interest, no specific rules relate to them. We note the submitter's position that control of the other species is supported.
18.10	Frank, Hermann	Section 6.1 – 6.3 are all supported and the detailed description of the pests etc. is positive, but as mentioned above, they might be better placed in an appendix.	Support in part  See submission point 18.4	Reject	We accept the current formatting of the plan.
18.12	Frank, Hermann	Under Plan Objective 5 for bell heather the wording 'not increase' should be replaced by 'decrease'.	Amend objective 5 to replace 'not increase' with 'decrease'	Reject	We accept the Council's position that the suggested amendment would change the objective from a sustained control approach to a progressive containment objective. To actively decrease extent would require a significant increase in resources from the proposed programme.
18.22	Frank, Hermann	Table 26 and Plan Objective 16 for Old Man's Beard are supported, but in Plan Rule 6.4.18 the size needs to be changed from 100sqm to 500sqm and also Plan Rule 6.4.19 is covered by Plan Rule 6.4.20. The width to the boundary in Plan Rule 6.4.20 needs to be changed from 20m to 50m. If Plan Rule 6.4.19 should remain (for what reason?), the distance should be changed accordingly.	Amend rule 6.4.18 to change the size from 100sqm to 500sqm	Reject	We accept the Council's position that this increase in size would pose unreasonable costs to occupiers to manage old man's beard.

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18.23	Frank, Hermann	See submission point 18.22	Delete rule 6.4.19 as it is covered by rule 6.4.20	Reject	We accept the Council's position that Rule 6.4.19 is specifically a good neighbour rule, which can only be enforced under a number of conditions, one of which is that adjoining neighbours have cleared or are clearing old man's beard infestations within 20 metres of the boundary. Rule 6.4.20 requires that old man's beard is destroyed within 20 metres of the boundary regardless of the neighbour's control. However, rule 6.4.19 does not apply to the Crown, whereas 6.4.20 does.
18.24	Frank, Hermann	See submission point 18.22	Amend rule/s 6.4.19 and 6.4.20 [depending on decision in submission point 18.23] to change the boundary width from 20m to 50m	Reject	We accept the Council's position that this increase in width would pose unreasonable costs to occupiers to manage old man's beard, and could not be justified.
20.1	Marlborough District Council - Jono Underwood	MDC supports the proposed programme for Kangaroo Grass. This organism is under management in the Marlborough Region.	Support in part  Retain the proposed Programmes for Kangaroo Grass.	Accept	No changes are proposed as a result of this submission.
20.2	Marlborough District Council - Jono Underwood	MDC supports the proposed programme for Woolley nightshade. This organism is being considered for management in the Marlborough Region.	Support in part  Retain the proposed Programmes for Woolley Nightshade.	Accept	No changes are proposed as a result of this submission.
20.3	Marlborough District Council - Jono Underwood	MDC supports the proposed programmes for Moth Plant. Moth plant in the Marlborough has been managed for a number of years and is under sustained control.	Support in part  Retain the proposed Programme for Moth Plant.	Accept	No changes are proposed as a result of this submission.
20.4	Marlborough District Council - Jono Underwood	MDC supports the proposed programmes for Rooks. Rooks have been managed in Marlborough and are now believed to be eradicated (no active rookeries).	Support in part  Retain the proposed Programme for Rooks.	Accept	No changes are proposed as a result of this submission.
20.6	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.	Support in part  Ensure the structure of the programme and determine whether the likelihood Principles Measures and Rules will	Accept in part	The Council proposed a new Rule 6.4.9 in response to this submission. We directed changes to Rule 6.4.9 early in the process, and received feedback on those changes from the Council. We accept, for the reasons set out by the Council, that the rule is appropriate.



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		<p>a)The management of the pest plant.</p> <p>While Service Delivery is mentioned as a Principle Measure, the programme reads that occupiers are responsible for carrying out control work. MDC has a long history of managing CNG. For the last 20+ years, the bulk of control work has been driven via occupier obligations. From experience, for a number of reasons that can be elaborated upon, this has not resulted in effective management.</p>	<p>achieve the stated Objective. This should require an assessment of programme costs and cost allocation and MDC wishes to endorse the application of suitable resources into the CNG programme to effectively meet programme objectives.</p>		
20.7	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>b) Rule 6.4.8 seems to place a very 'light' obligation on occupiers and the CNG Management Agreement definition contains no mention of organism management activities.</p> <p>MDC wishes to express concern over a seemingly light approach to management on the pest plant and more reliance on occupier management. This is where historical programmes have come from in the Marlborough Region with not ideal outcomes. MDC is now becoming more actively involved in the management of the pest in recognition of more agency involvement being needed to effectively achieve outcomes.</p>	<p>Support in part</p> <p>Amend provisions to either a higher degree of obligation on occupiers or move toward more involvement of Environment Canterbury in the management of the pest, and articulate that.</p>		Refer to submission 20.6.
20.8	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>c) MDC assumes that legal advice has been sought over the placement on an obligation to be party to an agreement within Rule 6.4.8, as it is not clear whether this Rule requirement</p>	<p>Support in part</p> <p>Clarify the legality (robustness) of Rule 6.4.8 with respect to placing an obligation on occupiers to be party to an agreement.</p>	Accept	The Council supported amendments to the CNG provisions and those are included in RPMP.

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		meets any of the rule purposes permitted under Section 73(5) of the Act.			
20.9	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>d) While MDC support the approach taken to address spread risk vectors and pathways, there is a limitation of Rule 6.4.8 in that an obligation is only placed upon occupiers with CNG present on their property. MDC expresses concern over the narrow scope of influence of such a Rule in that it does not place obligation or persons at large to carry an obligation to conduct activities in a certain manner.</p>	<p>Support in part</p> <p>Amend provisions to broaden the approach taken to spread risk mitigation to greater than just occupiers with CNG on their properties. Explore the use of specific Rules regulating high risk activities at large.</p>	Reject	No further information was provided to the Panel or staff about what high risk activities might be. No evidence was presented to assist with this decision. We are satisfied in the absence of further information that provisions are in place to manage activities.
20.10	Marlborough District Council - Jono Underwood	<p>MDC supports the proposal to include a RPMP programme for Chilean Needle Grass (CNG). However, MDC would like to raise points of concern with respect to the proposed programme.</p> <p>As a general comment, MDC notes the use of the terms 'spread' within the programme description. This inherently relates to where the plant is found, spatially. However, spread of the plant makes up but one half of the programme objective in that part (i) targets no increase in population levels. No other parts of the programme description highlight how the programme will prevent an increase in population levels.</p>	<p>Support in part</p> <p>Clarify what programme components will see no increase in population levels as being sought within the programme objective.</p>	Accept in part	<p>We accept that, as staff have indicated, that collaborative approaches with occupiers will assist with achievement of the objective, and also refer to the new Rule 6.4.9 (refer also to submission 20.6).</p> <p>Monitoring will also assist with understanding how the objective is achieved, and should be undertaken to note both spatial distribution and population density.</p>
20.11	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Feral Rabbits. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	<p>Support</p> <p>Retain the proposed Programme for Feral Rabbits.</p>	Accept	No changes are proposed as a result of this submission.

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20.13	Marlborough District Council - Jono Underwood	MDC supports the proposal to include a RPMP programme for Saffron Thistle. The management of this organism is also proposed to continue in the Marlborough Region. Having a consistent approach can only be beneficial for both regions.	Support  Retain the proposed Programme for Saffron Thistle.	Accept	No changes are proposed as a result of this submission.
21.1	Eggers, James	1.Genetically breed rabbits to be infertile.	Insert provisions to genetically breed rabbits to be infertile.	Reject	It is outside the scope of the PRPMP to provide for the genetic modification of rabbits. The council does the follow development of biological controls for pests, and in some cases may provide funding or support for applications for funding. This is part of the council's wider biosecurity programme.
21.2	Eggers, James	2.Organise hunting days, or weekends, where people are educated, trained and transported to sites to shoot rabbits.	Insert provisions in the RPMP to organise hunting days, or weekends, where people are educated, trained and transported to sites to shoot rabbits.	Reject	It is outside the scope of the PRPMP to facilitate hunting events, while community pest control days may be facilitated for pests such as old man's beard, the council does not have the capability to facilitate hunting events.
23.1	Mueller, Tim	In general, I support the Regional pest Management Plan being proposed by the Regional Council and in particular the site-led programme for Gorse and Broom, Ohau. However, as a new property owner in the Lake Ohau Alpine Village, the proposal is not particularly clear as to what is expected or required from me as a property owner. For instance, at what stage am I , the owner of a small undeveloped 700 sq metre section, expected to intervene? And more importantly, how often should I intervene. Is there some financial assistance or recommended service providers that the Council can provide, especially to those of us who are absentee?	Clarify what is expected or required from me as a property owner. For instance, at what stage am I , the owner of a small undeveloped 700 sq metre section, expected to intervene? And more importantly, how often should I intervene. Is there some financial assistance or recommended service providers that the Council can provide	Reject	While the submission is acknowledged, no specific relief is included in this submission summary. Staff have noted they will follow up with the submitter.
24.1	Ravensdown Limited - Anna Wilkes	Ravensdown supports the inclusion of Whiterock Quarry in the Site-led Programme for eradication of Wild Thyme.  We consider that the management of Wild Thyme on the quarry site and 3.5ha of land	Support  Retain inclusion of Wild Thyme management at Whiterock	Accept	No changes are proposed as a result of this submission.

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		leased from the Milne family trust (Lot 4 DP755) to the north of the quarry fits with our existing maintenance regime for managing weeds and do not see it as an onerous addition. We will continue to work with Environment Canterbury to fulfil our obligations under the Regional Pest Management Strategy.	Quarry as a Site-led Programme as proposed.		
25.4	Rayonier Matariki Forests - Steve Chandler	Page 37 Table 14: Support: Agree with broom, gorse and nasella tussock being included as pests for sustained control.	Supports broom, gorse, nassella tussock being included as pests for sustained control.	Accept	No changes are proposed as a result of this submission.
25.7	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.10, Page 52: Support.	Supports Rule 6.4.10	Accept	No changes are proposed as a result of this submission.
25.8	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.13 page 53: Support	Supports Rule 6.4.10	Accept	No changes are proposed as a result of this submission.
27.1	Taylor, R E	<p>ECan does not invest sufficiently in invasive weed control on the river corridors of South Canterbury, which are reservoirs of weed specvies spreading beyond therivers, such as such as sycamore, old man's beard and buddleia. I have photos to illustrate this, taken on the Lower Opihi, Waihi and the TeMoana. Some rivers (e.g. TeMoana) do not appear to have local rating districts, which must contribute to the lack of public resources?</p> <p>The Canterbury braided rivers are also becoming clogged by shrubby willow growth (which may be from seed?), lupins, broom and gorse - after several dry summers have meant no or little flood scouring. Once the islands in these rivers are stabilised by weed growth and associated silt trapping, they become harder to erode and the braided character of the rivers tends to be lost. With this comes loss of bare shingle nesting habitat for endangered birds such as black billed gulls and black fronted terns, also wrybills, stilts and banded dotterells.</p>	<p>Oppose</p> <p>No specific decision requested</p>	Accept in part	A number of changes in response to other submissions address the concerns of the submitter. While the submission is acknowledged, no specific relief is included in this submission summary.

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		There must be opportunity to connect river engineering works with ECan's biodiversity commitments and intervene more effectively?			
44.1	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>"Plan Objective 10 Over the duration of the Plan, sustainably control Chilean needle grass within the Canterbury region to ensure: (i) that current infestations levels do not increase; and (ii) any spread to other properties is prevented to minimise its adverse impacts on pastoral production values.</p> <p>The CNGNSG endorses the above Objective.</p>	<p>Support</p> <p>No specific decision requested</p>	Accept	No changes are proposed as a result of this submission.
44.2	Chilean Needle Grass National Steering Group - Warwick Lissaman	The CNGNSG takes issue with the lack of transparency and rigor in the above assessment [Chilean needle grass Principal measures to be used and Alternatives considered]	No specific decision requested	Reject	This section formed part of the proposal but has been removed as part of the final plan.
44.3	Chilean Needle Grass National Steering Group - Warwick Lissaman	CNGNSG Agree with the comment: "Relying on voluntary control is not appropriate due to the rapid spread and very substantial adverse effects if control in not undertaken by a land occupier"	<p>Support</p> <p>No specific decision requested</p>	Accept	Refer to submission 44.2
44.4	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>"Environment Canterbury could take on the responsibility for controlling the spread of Chilean needle grass. However, the extent of Chilean needle grass is such that the logistics of carrying out the control programme would be difficult to integrate with individual property occupier management requirements"</p> <p>This statement has merit, however just because it is hard to do does not mean it should not be done.</p>	No specific decision requested	Reject	Refer to submission 44.2
44.5	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>"It is also unlikely to be cost effective"</p> <p>CNGNSG takes issue with the lack of transparency and rigor in the above assessment; Protecting New Zealand's Hill and High Country future land use and the</p>	No specific decision requested	Reject	Refer to submission 44.2

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		understanding of the protection of New Zealand's fresh water, biodiversity and recreational values let alone the direct cost of pasture renovation and animal welfare issues are all part of the analysis required. This work has yet to be completed and when done will add enormous value to future cost benefit analysis.			
44.6	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>"Furthermore, the consequences of occupiers no longer owning the problem could lead to overoptimistic expectations on the part of both occupiers and the wider community and adverse effects to economic well-being would not be minimised. This alternative is therefore rejected. There are no alternative measures that provide for satisfactory inspection, education or advocacy measures."</p> <p>CNGNSR wish to point out that one does not need to look far from ECAN's own regional boundary, to see one of many alternatives being implemented; this statement should be removed to enable opening of lines of communication and sharing of ideas and values.</p>	No specific decision requested	Reject	Refer to submission 44.2
44.7	Chilean Needle Grass National Steering Group - Warwick Lissaman	<p>CNGNSG opposes the Plan Rule 6.4.8 (a)</p> <p>Please refer to the attached proposed draft rules of Marlborough District Council PMP, where the elimination zone was previously 10m and this has proved to be ineffectual and of no positive environmental outcome, a default rule that: 'Occupiers shall destroy all Chilean Needle Grass (Nassella neesiana) plants, on land that they occupy, each year before they produce seed, unless a Management Plan* approved by Council is in place. A breach of this rule will create an offence under section 154N(19) of the Biosecurity Act.'</p>	<p>Oppose</p> <p>Delete rule 6.4.8 (a) and replace with 'Occupiers shall destroy all Chilean Needle Grass (Nassella neesiana) plants, on land that they occupy, each year before they produce seed, unless a Management Plan* approved by Council is in place. A breach of this rule will create an offence under section 154N(19) of the Biosecurity Act.'</p>	Accept in part	We accept, for the reasons set out in its response to the submission, that new rule 6.4.9 proposed by the Council is appropriate.

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44.8	Chilean Needle Grass National Steering Group - Warwick Lissaman	CNGNSG endorses the Plan Rule 6.4.8(b), and recommend the inclusion of one more bullet point  • to address specifically, the use of CNG infested land for recreational use.	Support in part  Amend rule 6.4.8(b) to include an additional bullet point: to address specifically, the use of CNG infested land for recreational use.	Accept	Accepted for the reason set out by the Council.
53.1	Rural Advocacy Network - Jamie McFadden	We support the general direction of the strategy in addressing pest issues. All landowners need to be responsible managers of their land. The momentum on legacy pests particularly broom, gorse, nassella and rabbits needs to be maintained.	Support  General support for the PRMP	Accept	No changes required as a result of this submission.
53.4	Rural Advocacy Network - Jamie McFadden	There is a conflict between the CRPMP and the Land & Water Regional Plan (LWRP). On the one hand the CRPMP seeks to limit the spread of pests. On the other the LWRP stock exclusion rules exacerbate the spread of pests through the requirement for fencing of waterways and wetlands. We believe this inequity needs to be addressed in that ECans fencing requirements are aiding the spread of pests thus burdening landowners with additional costs and compliance issues. This is particularly an issue with the broom and gorse less than 50m2 rules. Related to this is that fenced waterways near main rivers such as Hurunui, Waiau, Pahau and Waitohi are being invaded by old mans beard. Mandatory stock exclusion requirements should not apply in hill, high country or extensive grazing situations. We submit that where waterway fencing is required and weed invasion likely a pragmatic approach is required.	Insert provisions in the RPMP for mandatory stock exclusion requirements to not apply in hill, high country or extensive grazing situations. We submit that where waterway fencing is required and weed invasion likely a pragmatic approach is required.	Reject	This is a matter for the Land and Water Regional Plan and the provisions of the RPMP are for a different purpose and cannot exclude a rule under the RMA. Matters relating to pest management need to be brought up as part of the LWRP processes.
58.3	KiwiRail Holdings Limited (KiwiRail) - Pam Butler	KiwiRail supports the use of Good Neighbour rules (GNRs) for all PPMP stakeholders and occupiers. PPMP provides for GNR's for plant pests broom, gorse, old man's beard, and nassella tussock. KiwiRail considers the both Good Neighbour Rules and agreed Management Plans are methods by which	Retain Good Neighbour Rules	Accept	No changes required as a result of this submission.

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		<p>parties can agree to priorities for pest management based on significant pests threats. Other possibilities include:</p> <ul style="list-style-type: none"> <li>contributions to biological control agent trials and release</li> <li>targeted timing of pest management with agency or other projects</li> </ul>			
77.17	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part objective 13 and related good neighbour rule 6.4.5 seeking the sustained control of Feral Rabbits to ensure population levels do not exceed Level, 3 on the Modified McLean Scale. Sustained control will ensure effects of Feral Rabbits on biodiversity and production values are minimised.</p> <p>LINZ however considers that an exemption should be included in rule 6.4.11 from having to control rabbits where an effective boundary fence is in place along the entire length of the common boundary which prevents rabbits crossing into the neighbouring property.</p>	<p>Support</p> <p>Retain objective 13</p>	Accept in part	<p>Where an owner has a rabbit proof fence, they may seek an exemption from the rule, which can be granted subject to conditions. We do not consider an exemption should be written into the rule.</p> <p>No changes required as a result of this submission.</p>
77.18	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.17	<p>Support in part</p> <p>Amend good neighbour rule 6.4.11 as follows:</p> <p>Note: This is designated a Good Neighbour Rule</p> <p>An occupier within the Canterbury region shall, upon receipt of a written direction from an Authorised Person, control feral rabbit densities on their land to at or below Level 3 on the Modified McLean Scale within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also controlling feral rabbit densities at or below Level 3 on the</p>	Reject	Refer to submission 77.17.



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			<p>Modified McLean Scale within 500 metres of the boundary.</p> <p>The provisions of this rule do not apply where there is a rabbit proof boundary fence along the entire length of common boundary of the property which is effective in preventing rabbits crossing into the neighbouring property.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>		
77.21	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 16 and related good neighbour rule 6.4.19 seeking the sustained control of Old Man's Beard to ensure plant numbers or density levels do not increase. Sustained control will ensure effects of Old Man's Beard on biodiversity values are minimised.	<p>Support</p> <p>Retain objective 16, and good neighbour rule 6.4.19.</p>	Accept	No changes are required as a result of this submission.
78.13	Department of Conservation - David Newey	The Director General considers that sustained control of pests is vital. There are however additional pests which, due to their nature, spread and effect should be included in this section of the plan.	<p>Support in part</p> <p>Retain with amendments outlined in this submission.</p>	Accept in part	While the submission is acknowledged, no specific relief is included in this submission summary.
78.18	Department of Conservation - David Newey	Where there is effective fencing and there is no cross-boundary issue, a good neighbour would not apply in this instance.	<p>Support in part</p> <p>Amend rule 6.4.11 to recognise that if an effective fence prevents feral rabbits from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.</p>	Reject	Refer to submission 77.17
78.25	Department of Conservation - David Newey	The current description underrates the significance of this invasive species.	<p>Support in part</p> <p>Amend the description "Purple Loosestrife is rated in the top</p>	Accept	This provides a better description of the pest species and is supported by the Council.

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			100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)", and "It impacts on environmental and agricultural values, as well as impacting on kai and taonga species important to Ngai Tahu.		
78.34	Department of Conservation - David Newey	The current description underrates the significance of this invasive species.	Support in part  Insert into the description "Spartina is rated in the top 100 alien invasive species worldwide. (Global Invasive Species Database, IUCN)", and "It impacts on environmental values, recreational usage, impacts on kai and taonga species important to Ngai Tahu, and, commercial fisheries. Estuaries are recognised as important habitats for some juvenile fish species harvested by commercial fisheries.	Accept	This provides a better description of the pest species and is supported by the Council.
78.35	Department of Conservation - David Newey	With the recent additional funding of \$50,000 provided to ECAN for Spartina control it is possible to reduce the area of Spartina by considerably more than 50%	Support in part  Amend objective 20, the area that Spartina will be reduced by from 50% to a higher percentage	Accept	We understand that addition funding has been received in relation to the Department of Conservation's "Dirty Dozen" War on Weeds. The objective is amended to read:  (i) the area of spartina being reduced by <u>75%</u>
78.36	Department of Conservation - David Newey	The Director General appreciates the work that has gone into the analysis of benefits and costs. There are some inaccuracies and omissions in the analysis for some species. Our concerns mainly lie with wilding conifers, Bennetts wallaby, purple loosestrife, Spartina, gorse, and broom.  An analysis of costs and benefits for Russell lupin is desirable. There are significant and increasing costs to control this species at important sites. There may be a marginal	Support in part  Request that a review of the analysis of costs and benefits if the species are either removed from the strategy or substantial changes are proposed in the final plan.  Conduct an accurate analysis of costs and benefits for Russell lupin.	Accept	The submission is accepted and a cost benefit analysis of Russell lupin was undertaken.

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		benefit as a fodder crop. Fodder crop growers have alternative and less invasive fodder crop options. The seed is long-lived and spreads via water, shingle extraction and machinery. It has potential to become an intractable weed issue once established. We do not agree with the assessment and comments on this weed as described on page 189 of the analysis of costs and benefits table.			
79.3	Christchurch City Council - Brenda Greene	The requirement to act occurs only when rules dictate.	Insert rules for puna grass, bur daisy, saffron thistle and all unwanted organisms in the sustained control programme, including how objectives will be met, and how land occupiers can be expected to accept the costs allocated and funding rationale given on pages 89 and 90.	Reject	The Council has advised that it will provide the service delivery to manage the pest (as described in the "Principal measures to be used" section). The reason why these organisms are included in the plan is to declare these as pests and ensure that Officers are able to call upon powers under the Biosecurity Act (Part 6) to ensure that effective management can occur. Occupiers need to be aware of the requirements under Sections 52 and 53 of the Biosecurity Act which place restrictions on organisms classified as pests, including preventing the communication, release, spread, sale and propagation of pests. (See section 5.4 of the RPMP).
79.25	Christchurch City Council - Brenda Greene	It is possible to eradicate Old Man's Beard and to restrict its range. The Auckland Council, for example, provided incentives for residents of the Waitakere ranges, and has successfully reduced the population to zero densities. Support provided included advocacy and the provision of free, convenient pest plant waste disposal. We therefore disagree that there are no alternative measures that provide for satisfactory inspection, education or advocacy. While it is true that relying on voluntary action to minimize adverse impacts from Old Man's beard would not be effective due to inadequate incentives, increasing incentives has been shown to be effective. We believe that advocacy and incentives focused on pests that are easily identified, and for which the community has access to control methods will empower individuals to take collective action, and support local community.	Amend the RPMP to insert provisions for a trial for a period of 5 years a programme similar to that adopted by the Auckland Council on Banks Peninsula.	Reject	We accept the Council's position that the RPMP proposes a number of site-led programmes for old man's beard, in order to support the community to achieve their aspirations. Advocacy and incentives could be provided using non-regulatory methods, alongside the RPMP.

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81.4	QEII National Trust - Alice Shanks	Given the small size of the two thyme ( <i>Thymus vulgaris</i> ) infestations it is clear that the control applied for the past 15 years is not working. It is more economic and efficient to eliminate thyme. It is a threat to the Eastern South Island limestone ecosystem, a Naturally Uncommon ecosystem, with a disproportionate number of National and Regiona threatened plants.	Support in part  Amend the RPMP to reclassify <i>Thymus vulgaris</i> to a Eradication species and removed within 10 years, using intensive, methods that have no impact on the indigenous biodiversity and threatened plants at the sites.	Reject	We note the target reduction of 50% for Wild Thyme in three site-led programmes in the plan.  Further site-led programmes could be added. We note that in addition, provisions are included that outline the process for inclusion of site-led programmes.
81.6	QEII National Trust - Alice Shanks	Australian sedge is now in Canterbury. It is recorded on <a href="http://www.naturewatch.org.nz">www.naturewatch.org.nz</a> as growing with Landcare and Lincoln University grounds.	Support in part  Amend the RPMP to treat Australian sedge as an Elimination species since it has now naturalised at sites in Canterbury.	Reject	We understand that the Council has contacted Landcare Research to confirm this presence and they have identified that this is <i>Carex divulsa</i> (grey sedge), not Australian sedge.
82.4	Ministry for Primary Industries - Sherman Smith	In contrast to these we noted there are pests that have boundary control rules, such as Chilean needle grass and wilding conifers that are not designated as GNR.	Amend Chilean needle grass and wilding conifer provisions in the RPMP to designate these as GNR to provide consistency within the plan.	Accept in part	We accept the Council position that Chilean needle grass does not require a Good Neighbour Rule, as there are no Crown held properties that have been identified as being infested with Chilean needle grass.  We agree that it is appropriate that boundary rules relating to wilding conifers are designated good neighbour rules.
84.1	Gibson, Bill	Having farmed 25 years where Old Man's beard was growing for years, indicated by circumference of the vine I have found it is being confined to its original area by frosts and grazing animals. Native vines and Old Mans beard occupy similar areas and are part of the biodiversity .Native vines being hardy spread outside Old Mans Beard areas and cover more treesAs landholders are also part of the diversity and rules are going to cause stress and unnecessary costs.	Delete Old Man Beard rules as they are going to cause stress and unnecessary costs.	Reject	We accept the Council's position that old mans beard be included due to the adverse effects on environmental and amenity values.
85.4	New Zealand Defence Force - Stephen Phillipson	Chilean Needle Grass (CNG) under a boundary control rule of 10m has been known to spread to adjoining properties, therefore have a 5m boundary control zone in the proposed CRPMP	Support in part  Amend rule 6.4.8 (a) to require the elimination of all Chilean Needle Grass plants within 20	Reject	We are satisfied with the Councils response that 5 metres is sufficient. It indicated that the seeds fall near to the parent plant, and are not adapted to wind dispersal. The range of seed fall is between two to three metres from the parent plant. The council has a rigorous inspection

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		will not achieve the objective of preventing the spread to nearby properties.	metres of an adjoining property boundary.		process in place and also has a collaborative programme in place to prevent the spread and ensure that infestation levels do not increase.
85.5	New Zealand Defence Force - Stephen Phillipson	While matters for inclusion in the Chilean Needle Grass Written Management Agreement are identified in Plan Rule 6.4.8.1 (Definitions), the extent of obligations a 'party' will be subject to under the Agreement (e.g. legal, financial) are not clear.	Support in part  Amend rule 6.4.8 (b) to include clarification as to the extent of obligations a 'party' will be subject to under a Chilean Needle Grass Written Management Agreement.	Reject	We understand that the obligations will be negotiated on a case by case basis.
85.6	New Zealand Defence Force - Stephen Phillipson	As drafted, this rule would be difficult to monitor and enforce. If the rule cannot be adequately enforced there seems little requirement for including it in the proposed CRPMP. In any event, for existing CNG infested properties, this rule could be covered under the CNG Written Management Agreement which could then be enforced through that agreement (under plan Rule 6.4.8).	Oppose  Delete rule 6.4.9, and/or amend to include the prohibition of minimisation of movement of CNG seed beyond the relevant property boundary as a matter to be included in the CNG Written Management Agreement.	Reject	This rule is different from the 6.4.8(b) because there is no agreement or discretion for transporting Chilean needle grass seed beyond property boundaries. We note that neither rule is a good neighbour rule and does not apply to the Crown.
88.7	Forest and Bird - Jen Miller	Support for Table 7 Plan Objective	Support  Retain the wording of plan objective 1	Accept	No changes are required as a result of this submission.
89.1	Neal, Kim	My submission relates to section 5 pest management frame work page 18 subsection 5.4 rules section 73(5) and 73(6) pages 19,20.  I oppose the 10-20meter good neighbor rule because the good neighbor rule for stopping the spread of weeds doesn't work in hill country areas with water run off, carrying seeds over land into small streams that lead into bigger rivers. This water run off system picks up seeds from well inside property boundaries further back than the 10 or 20 good neighbor strip. We are having to spend a lot more time and money getting rid of weeds that grow on the banks of	Amend the RPMP to provide assistance to affected land owners to get rid of water spread weeds along river banks.	Reject	Insufficient information was supplied with the submission to assist with understanding the specific issues for the submitter, and no evidence was presented.

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		<p>the river that runs through our property than we used to.</p> <p>The decision that Ecan could make is to help affected land owners with the control of getting rid of these water spread weeds along river banks.</p>			
90.1	Johnstone, Robert	<p>Not enough account is taken for the effect of wind on seed spread also birds. I have wilding pines (only a few) on Ashley Gorge which could only have become established from wind blown seed from Lees Valley 6km to the north-west. Similarly with broom on the back of the property, which clearly came from wind blown seed on what is now DOC land of Mt Oxford about 3/4 km westward and upstream. And on my flats I am infested with Old Man's Beard in a new plantation from wind borne-seed from the Crown riverbed (LINZ) where no control is or has ever been undertaken</p>	<p>Amend provisions in the RPMP to ensure that property owners downwind of established seed sources should not be held responsible for infestations they have no control of particularly if the source is from Crown Land being neglected.</p>	Reject	<p>The responsibility of weeds establishing on land becomes the responsibility of the landowner/occupier.</p>
90.9	Johnstone, Robert	<p>Council Reserves - these are not mentioned, but are widespread throughout Canterbury - mostly old gravel pits, which are now infested with G&amp;B, blackberry &amp; nodding thistles.</p>	<p>Amend the RPMP to consider pest management at Council Reserves</p>	Reject	<p>Council Reserves are subject to the rules in the RPMP, as private occupiers are, so no specific provision is required.</p>
90.16	Johnstone, Robert	<p>Boundaries - In general terms I support the current boundary rules as they apply to G&amp;B and Roadsides . The current 40 metre boundary rule for nodding thistle is not practical and other "distance" thresholds should be carefully examined to take account of wind which is far more of a factor than is appreciated.. Again ,if it is to be included it should be enforced Ecan have been unwilling or unable to enforce G&amp;B boundary rules on part of my property which meant I had to spray the offending fence line myself and at my expense ( two loads with the helicopter--- \$800 -- and no thanks)</p>	<p>No specific decision requested</p>	Accept in part	<p>Accepted to the extent that gorse and broom boundary rules are supported. No changes are required as a result of this submission.</p>

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90.20	Johnstone, Robert	Rabbits - the introduction of RHD has had a huge beneficial impact across all rabbit prone regions in Canterbury. My understanding is that the effectiveness of the virus is lessening but another one has been identified and may well be introduced. My plea is to do everything in your power to encourage this introduction to hopefully give an enhanced level of rabbit control once again.	Ensure that the introduction of the new RHD virus is encouraged.	Reject	This is a matter that sits outside of the RPMP.
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Gorse and Broom					
Number	Name	Submission	Relief	Decision	Reasons
14.3	Loxton, Gavin	Oppose, Broom - The microscopic broom gall mite ( <i>Aceria genistae</i> ), introduced in 2008, which turns broom buds into deformed lumps. The mite has become well established at early release sites, stunting broom growth and even killing entire plants. Therefore spraying of broom with herbicides should cease. The biocontrol's have been effective, any further ECan expenditure should be on monitoring the spread of the gall mite, and the other biocontrol's introduced for broom. What replaces the broom once the biocontrol's take affect will likely be the main issue in the following 10 years.	Oppose broom provisions in the RPMP, ECan expenditure should be on monitoring the spread of the gall mite, and the other biocontrol's introduced for broom.	Reject	We accept the reasoning set out in the Council's response to the submission.
18.15	Frank, Hermann	Table 18 and Plan Objective 8 for broom is supported. The main impact of broom is described correctly, it also has a negative impact on wetlands, rocky outcrops and other specialised habitats for animals e.g. lizards. The same applies for gorse Table 24, so impacts on biodiversity needs to be added for these pests.	Amend gorse description to include the negative biodiversity impacts, on wetlands, rocky outcrops and other specialised habitats for animals e.g. lizards.	Accept	Amend the provisions to recognise the impact of gorse and broom on wetlands, rocky outcrops and other habitats.
18.16	Frank, Hermann	Objective 8 needs some alterations to the GNR and control of smaller infestations. As outlined earlier, the current Strategy had only limited success and stronger measures are needed. I suggest that the GNR for Plan Rule 6.4.5 and Plan Rule 6.4.7 the proposed distance is altered from 10m (the same as in the old plan) to a strip of 50m width.	Amend rules 6.4.5 and 6.4.7 to alter the proposed distance from 10m (the same as in the old plan) to a strip of 50m width.	Reject	We accept the Council's position that a 10m strip is appropriate and is sufficient to manage spread to neighbours.
18.17	Frank, Hermann	In Plan Rule 6.4.6 the area currently proposed is 50 sqm as in the old Strategy. As above, this had only limited success and often small infestations had grown bigger than this size as this is just about 7m x 7m and no enforcement was possible any more. It is suggested that size of the area in the Plan Rule 6.4.6 is increased to 1000sqm. This is still only an infestation area of 25m x 20m, so still manageable.	Amend rule 6.4.6 to increase the size area to 1000sqm	Reject	We accept that 1000 square metres would impose costs to occupiers. Also, the objective for broom is a sustained control approach, if occupiers are required to eliminate infestations up to 1000 square metres, this could require the removal of significant amounts of broom, that has been compliant under rules to date. This land would also have accumulated a significant seed-bank of broom.



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18.18	Frank, Hermann	Stricter control and enforcement are necessary. The same applies to Table 24 gorse.	Provide for stricter control and enforcement for gorse [and broom]	Reject	We note that enforcement of the rules sits outside the plan.
18.19	Frank, Hermann	For gorse, Plan Rule 6.4.13 and Plan Rule 6.4.14 the width needs to be change to 50m and 1000sqm respective (as for broom under the same rationale [see submission points 18.16 and 18.17] ).	Amend rules 6.4.13 and 6.4.14 to alter the proposed distance from 10m (the same as in the old plan) to a strip of 50m width, and 1000sqm respectively	Reject	Refer to submission 18.16 and 18.17.
18.20	Frank, Hermann	Also, broom and gorse, as well as long property boundaries, is a problem along rivers and their small streams, as they can spread along the waterways, especially much further downstream. Not much consideration has been given to this.	Insert provisions to consider broom and gorse spread along rivers and their small streams, as they can spread along the waterways, especially much further downstream.	Reject	We accept the Council's position on this submission for the reasons set out in its report.
18.21	Frank, Hermann	The Plan might consider, if it is possible, to, upon application, to wave the compliance for gorse and broom where they are being established for the defined purpose as a nursery vegetation for native revegetation.	Insert provision to enable, upon application, to wave the compliance for gorse and broom where they are being established for the defined purpose as a nursery vegetation for native revegetation.	Accept	Reference to the exemption process is included.
25.5	Rayonier Matariki Forests - Steve Chandler	Rule 6.4.5 Page 43: Support	Supports Rule 6.4.5	Accept	No change required as a result of this submission
25.6	Rayonier Matariki Forests - Steve Chandler	Rule 6.4.6 page 44: Support in part. In the Canterbury region plantation forest environment there are significant areas of broom and gorse infestation due to forest owners acquiring reverted farmland which was deemed unsuitable for agriculture due to the infestation. Forest owners undertake boundary control spraying with neighbours and during each successive forest rotation the gorse and broom under a closing forest canopy is suppressed and eventually dies. However at harvest the longevity of the seed	Support in part  Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.	Reject	No further information was provided at the hearing on this matter. We note that a process is available for exemptions.  No changes are proposed as a result of this submission.

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		enables a new crop of broom/gorse to germinate, this can be chemically controlled during the tree re establishment phase but it is not economically or environmentally practicable to continue to spray patches of gorse and broom within the forest after the 3 year re establishment phase. Gorse and broom is suppressed and dies out after canopy closure occurs (which is around 10-12 years after planting). This rule as it currently stands would put the majority of existing Canterbury plantations in breach of the rule.			
25.9	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.14 Page 54: Support in part: Comments are the same as that for rule 6.4.6 [see submission point 25.6]	Support in part  Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.	Reject	Refer to submission 25.6.
25.10	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.4.15 Page 54: Support in part: Comments are the same as that for rule 6.4.6 [see submission point 25.6]	Amend provisions to exempt gorse and broom infestations within plantation forests (but not including boundaries with neighbours) from this rule.	Reject	Refer to submission 25.6.
43.1	Couch, Rewi	<p>Part 11 Pest management Programs. Table 3.3 containment plant pests; Broom &amp; Gorse page 10: Broom page 44-45 7.5.1 - 5 and Gorse page 46-47 7.6.1-5</p> <p>I am making this submission as an advisory Trustee to Rapaki Maori Reserve 875 1A2B within the Lyttelton harbour catchment.</p> <p>"I oppose those parts of the plan identified above and wish to have them amended to enable greater land management options."</p> <p>At present we are considering land management plan options and I would like us to be able to consider a 100 year plan including native regeneration using gorse and broom as a nursery. These parts of the pest management plan restricts the opportunity to apply many alternative land</p>	<p>Oppose</p> <p>Amend gorse and broom provisions that enable us to allow gorse and broom to grow and spread in support of alternative land use options including regeneration. This would include internal gorse and broom spread but not boundary weed management when required by weed free neighbours.</p>	Reject	While we acknowledge the intent of the submitter's submission, we consider that the exemption process provides a better pathway to achieving the same outcome.

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		<p>management options. It restricts land use to grazing and applies a farming concept to all land use, preventing regeneration of native forestry on land that is failing financially, culturally and environmental as a farming unit.</p> <p>I have been involved with this land since I was a child in the early 1950's when my grandfather farmed it, I have sprayed gorse that just grew right back again and again. To day we are forced to graze cattle that cause excessive erosion, dead animals and stock effluent fill the stream bed and flush into the harbour polluting the kai moana in our bay to deadly levels many hundreds of times above the safe level for human consumption.</p>			
52.4	Ledgard, Nick	Support gorse / broom as sustained control pest	<p>Support</p> <p>No specific decision requested</p>	Accept	No changes are required in response to this submission.
52.5	Ledgard, Nick	Not enough attention to prevention, 'stitch in time' control of gorse/broom in 'land presently free' of g/b A major spread mechanism for g/b seed is water in streams/rivers. Once seeds gets into these, control becomes very onerous. Hence, there is a need to detect new plants in currently g/b-free areas. This could be achieved by inspection of (eg., flights over) such areas in spring, when g/b flowering.	Amend objective 14 to provide Greater 'stitch in time' effort in g/bfree areas to detect and remove isolated b/g plants, particularly in upper water-way catchments.	Reject	The rules requiring the elimination of scattered gorse and broom are sufficient to keep clear land clear.
52.6	Ledgard, Nick	Gorse and broom. A major spread pathway is via movement in gravel and shingle, often from quarries, or processed shingle piles (eg., as part of road maintenance). Users of processed shingle should be able to find out whether g/b seed is likely to be present. It is common practice these days for purchasers of any product to be informed of ingredients, particularly if considered harmful. If this is not done, it defies principles stated in 5.3, 1e (P19) (e) 'pests are not to be spread (propagated, sold, distributed), and pathways are to be managed (eg, machinery, gravel, animals).'	Amend the RPMP to require information on likelihood of g/b presence available to purchasers of processed shingle/gravel.	Reject	<p>Section 52 covers the spread of any pest.</p> <p>We accept the council's position that this matter can be addressed outside of the RPMP.</p>

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53.10	Rural Advocacy Network - Jamie McFadden	50m2 rule for gorse and broom. (pages 43, 44 & 52-54) We support the intent behind this rule which is that landowners are encouraged to undertake on going control of broom and gorse within their properties. However it has been problematic for three reasons. The first is that it doesn't provide any control incentive for landowners with extensive areas of broom and gorse (over 50m2). The second is that it creates a perverse incentive for landowners to allow areas to expand over the 50m2 threshold and thus beyond the compliance regime. The third issue is that landowners with an intensive control programme on large areas of gorse and broom end up being non-compliant as the areas get smaller. This could be resolved with a more pragmatic approach to the inspection regime that takes into account the whole farm programme & extent of control work undertaken in previous years. If this cannot be done then we oppose the inclusion of this rule.	Support in part  Amend provisions to enable a more pragmatic approach to the inspection regime that takes into account the whole farm programme & extent of control work undertaken in previous years.	Reject	We accept that this is not necessary to be referenced in the plan, and that the approach can be addressed at the time of inspection and/or enforcement.
55.2	Waiake Forestry Ltd - Alan Ogle	<p>In our view, however the Plan as currently proposed, has ignored under "Section 6.4 Pests to be managed under sustained control management" the practicalities of forest management. The Plan Rules 6.4.5 and 6.4.13, contain provisions where occupiers are required to "eliminate broom/ gorse infestations on their land within 10 metres of the adjoining property owner where the occupier is eliminating gorse infestations within 10 metres of that boundary..."</p> <p>To explain our concern requires a more detailed explanation of the forestry provisions in the Banks Peninsula under Christchurch City Council's (CCC) operative plan. Definitions of "Existing Forests" and "Forestry" are in the Definitions volume Part VII of the plan pages 348 and 349 (Copy attached). "Existing Forests" are those planted prior to Sep08 and replanted within 5 years of harvesting. These existing forests do not require a 10m setback from the boundary. All other forests are "Forestry" which has the 10m setback provisions as covered under "Forestry" in Appendix IX page 413</p>	<p>Amend rules 6.4.5 and 6.4.13 to contain a specific exemption/ revised wording for trees in "Existing Forests" under the CCC District Plan, specifically we submit that:</p> <p>That Plan Rule 6.4.5 on page 43 be amended by adding: The provisions of the 10 metre rule in the case of "Existing Forests" as defined in the CCC District Plan, be modified to be to eliminate broom within the area between the boundary and the stumps of the first row of trees, but not exceeding 10 metres, where Pinus radiata is planted as a plantation crop.</p> <p>That Plan Rule 6.4.13 on pages 53/54 be amended by adding: The provisions of the 10 metre rule in the case of "Existing</p>	Reject	The boundary rules are in place to avoid the spread of pest seed beyond a site boundary. We are satisfied that this rule is appropriate and should not include an exemption for planted pine forests. Rather, exemptions can be considered on a case-by-case basis.

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		When managing “Existing Forests”, planting and replanting is normally undertaken to within 1 to 2 metres of the boundary. This overcomes the challenge of having a 10m boundary-weed zone and the consequent fire risks resulting from the unplanted weed prone area. If the boundary fence area contains broom or gorse on the forest growing side of the fence and has a weed free area on the neighbour’s side, we spray the broom/ gorse back the stumps of the first row of trees for the first 3 to 4 years of tree growth. With Radiata pine, tree shading of the forest site from year 4 normally means no further spraying of boundary broom/ gorse growth is necessary. The planted trees progressively smother and suppress light to any boundary broom/ gorse. Spraying to 10m as required in the RPMP is not practical as the normal chemical mixes (Grazon or Meturon/ glyphosphate), will also kill the emerging pine trees as broom/ gorse invariably grows intertwined with the pine trees.	Forests” as defined in the CCC District Plan, be modified to be to eliminate broom within the area between the boundary and the stumps of the first row of trees, but not exceeding 10 metres, where Pinus radiata is planted as a plantation crop.		
60.1	Bleasdale, Chris	<p>I oppose the wording of the objective No. 14</p> <p>Detail of Decision Required and concerns to be addressed: The objective No. 14 does not recognise the fact that seeds are already present in may cases and have been in the ground for decades and should reflect this. Also, the wording of the objective should acknowledge that Landscape, Access and Biodiversity values are also adversely affected - not just production.</p>	<p>Oppose</p> <p>Amend objective 14 to recognise the fact that seeds are already present in many cases and have been in the ground for decades, it should acknowledge that Landscape, Access and Biodiversity values are also adversely affected.</p>	Accept in part	<p>It is better to recognise the impact that gorse can have on various biodiversity values, and this is recognised in the description of the pest in table 24. We consider that specific concerns with access and landscape can be addressed as part of site-led proposals, rather than in objective 14.</p> <p>Refer to submission 18.15.</p>
60.5	Bleasdale, Chris	The continuing attitude by ECan towards landowners with respect to Gorse Control is extremely disappointing. This is a major problem for New Zealand in general and Canterbury in particular which ECan have failed to address in a proper way. Ecan continues to take the path of least resistance and target the current land owner who in most cases are not responsible for the problem. In my opinion a quantum shift in ECan’s attitude is needed if there is to be any chance of	Amend Gorse provisions to recognise this needs to be a shared problem with a collaborative approach, not a draconian regime based on penalties for non-compliance.	Reject	The RPMP sets the minimum requirements for occupiers to ensure that land free of, or being cleared of gorse does not become reinfested and production values are not adversely affected. Where gorse is managed in site-led programmes to address biodiversity as well as production values, a collaborative and council-led programme is undertaken.

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		gaining any ground on this issue. This needs to be a shared problem with a collaborative approach, not a draconian regime based on penalties for non-compliance.			
67.6	Selwyn District Council - Lisa Arnott	Selwyn District Council supports The Council recognises the need to prevent gorse and broom from encroaching into reserve areas, and supports the proposed mechanisms to control these species.	Support  No specific decision requested	Accept	No changes are required as a result of this submission.
71.1	Graham, Peter	The 50 square metre is not practical on hill country and should be removed	Oppose  Delete Rule 6.4.14	Reject	We appreciate the concerns of the submitter, but on balance, we consider that it is important that pest plants are managed. We note the provision for exemptions.
77.16	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 8 and related good neighbour rule 6.4.5 seeking the sustained control of Broom to preclude land that is free of, or being cleared of broom, becoming infested. Sustained control will ensure effects of Broom on production values are minimised.	Support  Retain objective 8, and good neighbour rule 6.4.5.	Accept	No changes are required in response to this submission
77.19	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 14 and related good neighbour rule 6.4.13 seeking the sustained control of Gorse to preclude land that is free of, or being cleared of gorse, becoming infested. Sustained control will ensure effects of Gorse on production values are minimised.	Support  Retain objective 14, and good neighbour rule 6.4.13.	Accept	No changes are required in response to this submission
77.22	Land Information New Zealand (LINZ) - Maurice Dale	LINZ supports objective 20 and related Maps 7.3 and 7.4 seeking site led sustained reduction of Broom by 10% within the upper Rangitata and Rakiatia catchments. Site led sustained control will ensure the effects of Broom on biodiversity and production values are minimised.	Support  Retain objective 19, and maps 7.3 and 7.4.	Accept	No changes are required in response to this submission
78.17	Department of Conservation - David Newey	Spartium junceum, commonly known as Spanish broom appears to be an omission. It is another invasive species and is expanding its range.	Support in part  Amend broom provisions to include this species	Accept	This species is appropriate for inclusion.

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78.19	Department of Conservation - David Newey	On Public Conservation Land gorse is often used as a nurse crop for native plant restoration. This is a better alternative for conservation as it avoids use of expensive herbicides. Allowing reversion to native cover eliminates gorse from a site meeting plan Objective 14. Where herbicides are used the site often reverts back to gorse.	Support in part  Amend objective 14 to recognise that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective.	Reject	We do not consider this needs to be reflected in the objective. An exemption process is set out within the plan at 8.3.
78.20	Department of Conservation - David Newey	As above gorse can be a nurse crop in some situations	Support in part  Amend objective 14 Principal measure to be used to recognise that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective.	Reject	Refer to submission 78.19
78.21	Department of Conservation - David Newey	Recognition that in some situations gorse used as a nurse crop will result in native plant cover and over time will eliminate gorse from a site, meeting the plan objective. The Director General notes that Crown agencies are not bound by this rule.	Support in part  Amend rule 6.4.14 to not require private land occupiers to meet the requirements of this rule in situations where they are restoring native vegetation cover using gorse as a nurse crop.	Accept in part	Refer to submission 78.19
78.22	Department of Conservation - David Newey	Should not be hedges within 10m of Public Conservation Land as these contribute to ongoing seed source and spread.	Support in part  Insert rule to prohibit (new) gorse hedge within 10 of public conservation land where gorse is being controlled	Reject	The planting of new gorse hedging is prohibited under Sections 52 and 53 of the Biosecurity Act, which prevent people from selling, propagating or distributing any pest, or part of a pest, covered by the Plan.
79.21	Christchurch City Council - Brenda Greene		Support in part  Insert new rule into table 24 [gorse]:  Plan Rule 6.4.16	Reject	Refer to submission 78.19.

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			<p>Exemptions to the Good Neighbour Rule for gorse and broom will be provided for the life of the plan where sites of environmental value to the region have been identified.</p> <p>Explanation of rule</p> <p>Gorse and broom can act as a nursery crop fixing nitrogen and providing shelter, for regenerating native species and erosion control.</p> <p>Exemptions to the rule will cater for case by case applications to keep gorse and broom for environmental protection. For crown land which will be managed for biodiversity values in perpetuity and pastoral productivity values will not be required in future, an exemption may be granted in that the boundary rules will stand, but the management of gorse and broom within the property will be exempt.</p>		
85.3	New Zealand Defence Force - Stephen Phillipson	<p>Streams and other waterways are notable pathways for the spread of broom and gorse and often cross property boundaries. Since the driver for the rule is to "... manage the spread ... to an adjacent occupier ... " up-stream properties should be compelled to control broom and gorse around the margins of waterways that cross boundaries as well as along fence-lines.</p>	<p>Support in part</p> <p>Amend gorse and broom provisions to require up-stream properties to control broom and gorse around the margins of waterways that cross boundaries as well as along fence-lines.</p>	Reject	<p>We acknowledge that water can transport seed. This is addressed in the hill and high country by rule 6.4.6 and 6.4.14. These rules require the removal of incidence less than 50 square metres and will ensure removal near waterways and prevent the establishment of larger patches. Patches over 50 square metres will be established and will have shed seed which will survive in the soil for decades and provide a continual seed source in waterways. Including buffers on all waterways is regarded as impractical and potentially very costly. It is likely to be more efficient to remove infestations as they arise downstream. If such rules were to be considered a detailed analysis and further consultation would be required to meet the requirements of the Act.</p>



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90.2	Johnstone, Robert	The viability of seed, particularly Gorse and Broom (G&B) is amazing. There are literally millions of viable seeds still there waiting for the right conditions to germinate.	No specific decision requested	Accept	While the submission is acknowledged, no specific relief is included in this submission summary.
90.10	Johnstone, Robert	Gorse & Broom - where a property owner is or has undertaken a control programme on a (compliant) block of G&B they should not be penalized if they missed a few plants (now non compliant)	Amend the RPMP to ensure that property owners are not penalized for missing a few plants.	Reject	We accept the explanation from the Council that biosecurity officers consider individual circumstances during the enforcement process, and are guided by internally developed procedures to ensure consistent application. It is not possible to amend the rules to cater for implementation discretion.

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Number	Name	Submission	Relief	Decision	Reasons
34.1	Apiculture New Zealand - Karin Kos	<p>ApiNZ is interested in the proposed rules around gorse and broom in the RPMP. Gorse and broom are key pollen bearing plants for bees in Canterbury and are concerned about the removal of these key plants.</p> <p>We understand that the intent of gorse and broom in the RPMP is to stop these plants reinfesting areas of Canterbury that are clear or have been cleared of gorse and broom, rather than enabling the further removal of these key pollen bearing plants in Canterbury.</p> <p>ApiNZ wishes ECan to note the key benefits of gorse and broom for bees are as a pollen source and have concerns about spray management practices on these plants.</p> <p>ApiNZ notes the gorse hedge and boundary requirements for gorse and broom and the area size restrictions that are in place.</p> <p>ApiNZ supports the retention of gorse and broom in the RPMP.</p>	No specific decision requested	Accept	While the submission is acknowledged, no specific relief is included in this submission summary.
34.2	Apiculture New Zealand - Karin Kos	<p>ApiNZ wishes to note that broom, gorse and willow are key pollen bearing plants for bees in Canterbury. Willow in particular has some of the highest protein available for healthy bee development. While recognising that broom and gorse are problematic in some areas and restricting spread is a key part of the RPMP, we need to strike a fine balance between the necessity to spray for weed control and the requirement to retain vegetation as a nutritional resource for bees. These plants fill a critical gap as sources of food for bees until such time as other seasonal sources of pollen and nectar are available to replace them.</p> <p>Spraying of gorse and broom is the most likely method of control for gorse and broom. ApiNZ wishes ECan to note that spraying when gorse</p>	Amend provisions in the RPMP to ensure that spray management programmes for control of gorse and broom should be completed when the plants are not flowering and when bees are not present - Targeted spraying only and at times when bee traffic is at its lowest during the early morning and/or early evening; and when appropriate wind conditions prevail	Reject	These matters sit outside the RPMP. Refer also to submission 2.4.

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		or broom is flowering presents a massive risk to bees. They respect no boundary and will fly up to five kilometres in good conditions to collect nectar and pollen. Please note, just because you cannot see a beehive nearby, it does not mean that bees are not present working the plants or nearby nectar or pollen sources.	that ensure minimal spray drift.		
65.1	Trees for Bees - Ross Little	<p>I ask whether it is within the Regional Council's mandate to deal with weeds on private property where there are no spillover effects; the gorse plants provide significant benefits; or the landowner has not requested assistance? Elsewhere in the document, figures on compliance with gorse control rules reveal approx. 90% of affected landowners were non-compliant. I suspect a large number of those were noncompliant with this "scattered plants" rule, rather than the boundary rules. Therefore, I ask, does it work? I wish to raise five different situations where I believe this Rule is counterproductive.</p> <ol style="list-style-type: none"> <li>1. Bee Nutrition. Many species have been rigorously tested for the protein content of their pollen for bee nutrition and the time of the year they flower. Our results have revealed gorse is very important, as it is probably the best plant to provide good nutritious pollen for bees during the "off-season". Gorse flowers around or even during winter months when there is little else available. Extending the season for the bees enables them to build up their hives earlier in the spring and work later in the autumn.</li> <li>2. Unreasonable On-Farm Costs. have become aware of the impracticality it creates in hill and high country, by requiring extra travelling around hill and high country properties to attend to scattered bushes rather than all the gorse in the immediate vicinity, including regrowth and larger patches.</li> </ol>	<p>Oppose</p> <p>Delete rule 6.4.14</p>	Reject	<p>While we appreciate that gorse is an important pollen source for bees, we accept that gorse is properly considered a pest plant and requires management to limit its impact on ecological and productive values. We consider that retention of the rule outweighs the adverse impacts on bee production. We also note that the rules allow for large block management of gorse and broom, and that exemptions can be applied for.</p>

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		<p>A more workable option is to deal with a property's gorse problem on the basis of the location of the gorse, over two or three seasons when required.</p> <p>3. Intractable Terrain. There are large areas of intractable terrain where little else but gorse or broom will grow. Spraying such areas, whether small patches or large, is not only a waste of time and money, but can also exacerbate erosion problems.</p> <p>4. Regenerating Indigenous Species. Where native species occur in difficult terrain, e.g. remnant bush in gullies or on steep slopes, and gorse or broom require control, it is hard to avoid accidental drift, which can kill indigenous bushes and trees. Under suitable conditions, gorse and broom can also be useful as a cover crop for regenerating natives.</p> <p>5. Carbon Sequestration. Finally, the development of carbon sequestration efforts to alleviate climate change threats could also include scrubby weeds. While there are no financial rewards for landowners with gorse and broom, it does pose a moral question when weighing costs and benefits: in the light of ongoing research and evidence, should E-Can still be as concerned with controlling weeds for production purposes on private land as we are about the global climate issue.</p> <p>Cost/Benefit Study: I have looked through Simon Harris' analysis and have found that significant costs and benefits of gorse control (or not) as described above, do not appear to have been included in the calculations, the indirect costs to beekeepers and those who benefit from healthy bees, or in the case of carbon sequestration, under political considerations. There has been a colossal amount of money wasted on spraying gorse without the necessary follow-up work. The</p>			
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# Proposed Regional Pest Management Plan

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		incentive to control gorse (and broom) could be replaced by promoting awareness of the serious costs of losing control of these weeds, using case studies and other work to demonstrate best practice and effectively disseminating the results.			
65.2	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, where beehives are sited for nutrition during the months of April to August and there is no risk of spillover effects for neighbours or from livestock dispersing seed.	Reject	We are satisfied that the exemption process can be applied to this circumstance.
65.3	Little, Ross	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 farm properties where a farm gorse management plan exists.	Reject	Refer to submission 65.2
65.4	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, sites where native regeneration is advantaged by the presence of gorse, or the risks to indigenous	Accept in part	Refer to submission 65.2

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			species from spray drift is significant.		
65.5	Trees for Bees - Ross Little	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, areas where the terrain makes land infested with gorse naturally unproductive regardless of the weeds.	Reject	Refer to submission 65.2
65.6	Little, Ross	See submission point 65.1	Oppose  Alternative relief sought if that in point 65.1 is not granted, exclude from rule 6.4.14 and 6.4.6, land areas infested with gorse which may have value for carbon sequestration, including forestry	Reject	Refer to submission 65.2
65.7	Little, Ross	See submission point 65.1	Oppose  Amend the RPMP to to simplify the Exemption processes for the situations submitted on above [submission points 65.1 - 65.6].	Accept	Further detail is included in the plan regarding the exemption process.
66.1	Trees for Bees - Dr. Linda Newstrom-Lloyd c/f Ross Little	Gorse is a keystone plant that provides pollen to the honeybees at critical times when there is little else flowering in the South Island and most of the North Island. After 7 years of Trees for Bees field work, we have not been able to find another plant species that can provide the abundance and quality of pollen that gorse provides in the autumn, through winter and in	Oppose  Delete rule 6.4.14	Reject	Refer to submission 65.2

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		<p>the very early spring before the willows blossom. This problem is more serious in the South Island than the North Island because the South Island has much less diversity of native or exotic species that will provide pollen for the bees at these times. The most critical issue is the timing of gorse flowering when there are almost no other quality alternatives.</p> <p>Artificial feed is not a substitute for fresh natural pollen because bee health is best supported by their natural food (Di Pasquale et al. 2013, DeGrandi-Hoffman et al. 2015). Pollen substitutes and supplements are already overused in New Zealand due to the overstocking and overcrowding issues in the beekeeping industry (Newstrom-Lloyd 2017), therefore it is essential to conserve and replace as much natural pollen as possible to support bee health for pollination services.</p> <p>When gorse is removed or the flowers of gorse hedgerows are cut off before flowering, the bees are deprived of a traditional pollen source that has historically sustained bees over winter and provided good reliable population build up in early spring. It is important to ensure no gaps in flowering with consequent population crashes so that colonies are able to reach peak population size in time for summer pollination services (primarily the seed industry in Canterbury as well as horticulture) and for honey harvesting which sustains the bees and the beekeeper's livelihoods.</p>			
66.2	Trees for Bees - Dr. Linda Newstrom-Lloyd c/f Ross Little	See submission point 66.1	<p>Oppose</p> <p>Alternative relief sought if that in point 66.1 is not granted, provide efficient and well-publicised Exemption processes for the situations for</p>	Reject	Refer to submission 65.2

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			beekeeping pollen dearth.		
80.1	New Zealand Beekeeping Incorporated - Linda Bray	<p>We would be remiss in representing the interests of beekeepers if we did not point out to the regulators these plants provide the food sources, nectar and pollen that are essential for the sustenance of our honey bees.</p> <p>Years of removal of gorse hedges and the control of gorse and broom from areas unsuitable for development have had an effect on the sustainability of beehives in the Canterbury region.</p> <p>We do not have reliable evidence or impact reports relating to the removal of gorse and broom from our environment. However we can say, based on observations in retrospect, in the 1960-70's beekeepers did not fully appreciate the value of the traditional gorse fences that divided paddocks in the Canterbury farms as bees appeared to have sufficient pollen for their needs. As time has progressed, land use and attitudes changed, gorse hedges have been removed thus contributing to a decline of pollen sources in our environment. It has reached the stage where, in some cases, bees suffer from lack of pollen. Hives weaken and a downward spiral continues until the hive eventually dies or the beekeeper is forced to take some action to address the situation.</p> <p>Whilst we would be reluctant to press for other species of plants to be 'declared as pests' (ryegrass, wheat, barley etc) we consider the control methods for gorse and broom, together with the desire to utilize land for growing farmed plants means that gorse and broom could no longer be considered as 'invasive' pests but maybe considered as plants with a purpose.</p> <p>That purpose could be for animal control and shelter (important animal welfare issues) as well to provide food for many insect species.</p>	Declassify gorse and broom to not declare these as pests, and do not include further regulatory controls on gorse or broom.	Reject	Refer to submission 65.2



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		<p>These plants provide protection for larger growing trees in a natural regeneration of native or exotic forests. Environment Canterbury has not identified any positive benefits from some of the plants considered pests. We wish to inform ECAN the positive benefit of having a sustainable bee population in the Canterbury region means that the crops farmers grow that need insect pollination will continue to be pollinated by local bees.</p>			
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Wilding conifers					
Number	Name	Submission	Relief	Decision	Reasons
6.7	Ross, Fraser Bell	Wilding conifers: here it is understood that such species are subject to the Biosecurity Act section 52 and 53. However douglas fir is not named on the Programme for containment.	Insert provisions to include Douglas fir in the programme for containment.	Reject	We are satisfied that inclusion of pine and fir species as pests is not appropriate for the reasons set out by the Council. We do note that the wilding forms of these trees are recorded as pests, and that non-plantation forms are identified as pest agents within the Wilding Conifer Containment Area.
14.4	Loxton, Gavin	page 14, 4.1, Oppose, Pinus Contorta, The early growth stage control of pinus Contorta should be with controlled livestock grazing. As Contorta is the most palatable of the pine species , grazing programs developed for the susceptible sites should introduced first. An insect biocontrol investigation program should be considered for the non grazable areas, such as high altitude crown land and Department of Conservation land. Both of these programs would be considered longterm solutions to the wilding tree weed problem. To continue to spray the pine trees with herbicides in the short term will be very expensive, and likely to be only a containment exercise.	Oppose provisions for Pinus Contorta in the RPMP, grazing programmes for susceptible sites should be introduced first, an insect biocontrol investigation program should be considered for the non grazable areas.	Reject	We accept the Council's position that stock grazing along risk boundaries can be useful in managing young wilding conifers, but in high density areas of wilding conifers, grazing does not effectively manage the spread. We acknowledge that the current tool box is limited in terms of biological control for conifers, but we understand that research is being undertaken to produce a non-coning conifer tree.
20.5	Marlborough District Council - Jono Underwood	MDC supports the concept behind the programme as articulated in the Proposal. However, the proposed programme wording and structure is difficult to follow and does not make it clear to the reader how the programme will be implemented. It is acknowledged that some of this detail may be outlined in an Operational Plan. For example, there is an objective to clear 900,000ha of land of wilding conifers. Whilst a reference is made to the National Wilding Conifer Control Programme under Principle Measures, the way the Proposal is currently drafted; it gives the impression that the national programme gives effect to the RPMP programme.	Support in part  Clarify the structure and way the wilding conifer programme is drafted and structured to clearly articulate the relationship between the Environment Canterbury RPMP programme and the National Wilding Conifer Control Programme, including costs.	Reject	The National programme does assists in delivering the objective of the wilding conifer programme. We understand that this component is being managed as part of the wider biosecurity programme. The rules in the RPMP provide the regulatory backstop to ensure that the areas cleared through the national programme are maintained. We do not consider that it is appropriate to detail the costs of the National programme, as this is contingent on ongoing partner and central government funding.

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		There is also no clear link regarding costs/cost allocation detailed in the economic analysis and how these may/may not be related to the National Programme.			
25.1	Rayonier Matariki Forests - Steve Chandler	<p>Progressive containment objective and selection of wilding conifer species to be contained.</p> <p>It is important economically that Douglas fir and Radiata pine are not included on the containment species list as they are key contributors to the economic viability of the plantation forest industry in New Zealand. Any potential or actual spread threat from these two species from plantation forests which are for productivity reasons usually sited on lower altitude land (below 600m) and on soil types below class 6 or 7 can be readily contained with timely intervention and management. In addition we support the exclusion of Pinus Ponderosa from the containment species list as this species can be used as a boundary or exposed ridgeline buffer planting when more spread prone species are planted. Pinus Ponderosa is very wind firm, long lived and is not a prolific seed bearing species. Young seedlings are also palatable to grazing animals reducing the risk of potential spread.</p>	<p>Support</p> <p>Retain progressive containment objective and selection of wilding conifer species to be contained and not include Douglas fir, Radiata pine, and Pinus Ponderosa on this list.</p>	Accept in part	<p>We have retained the progressive containment approach, however we note that the definition of wilding conifer includes any wild introduced conifer. This is appropriate and enables appropriate control of species, including Douglas fir, which, based on evidence presented to us, is very prone to wilding spread. In addition, conifer species within the Wilding Conifer Containment Area are also identified as pest agents, with associated Rule 6.3.4. This rule is required to protect investment in the control of wilding pine species.</p>
25.2	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.3.1 page 35: Support.	Supports Rule 6.3.1	Accept	No changes are required as a result of this submission.
25.3	Rayonier Matariki Forests - Steve Chandler	Plan Rule 6.3.2 page 36: Support in part. As managers of Hanmer forest RMF have on their North Eastern boundary areas of inaccessible legacy wilding conifers that border crown, Doc and private land which also contain legacy wilding conifers arising from erosion control plantings and spread from early spread prone Corsican pine and larch plantings which have	<p>Support in part</p> <p>Amend provision 6.3.2, rather than any breach being an offence, if neighbours can agree to and provide an approved combined management plan to manage and</p>	Reject	We note that the exemption process can be used for particular situations and be considered on their merits.

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		<p>or are being successively removed within RMF's Hanmer forest.</p> <p>If our neighbours decide to eradicate their wilding conifers along our boundary, obliging us to remove a 200m boundary this has the potential to result in accelerated soil erosion into our land area and result in a carbon liability cost.</p>	<p>replace wilding conifers with alternative low spread prone carbon or erosion control species along their adjoining boundaries, then this should be given recognition in the plan.</p>		
28.1	Goldring, Maree	<p>It is important that this strategy maintains control of all wilding operations including the removal of those on Council reserves in communities. If it is left to a community under the auspices of a district council, using the vehicle of their reserves management plan can lead to a situation where personal views can overtake the requirements for all other land owners and occupiers under the regulations. It would allow a case of a community "wittingly allowing wilding spread". Neighbouring land would not then be "prevented from spillover" .</p>	<p>Ensure that control of wilding operations including the removal of those on Council reserve in communities is included in the RPMP.</p>	Accept	<p>We consider that the rules generally as notified should apply. Exemptions can be applied for, but will need to be looked at carefully as to whether they will continue to achieve the objectives in the plan. In addition, we note the introduction of new pest agent Rule 6.3.4.</p>
38.2	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	<p>We agree with the purpose of the proposed Regional Pest Management Plan (RPMP) as stated in Section 1.2 and with the Objective 4 of the proposed Plan as stated on p.35.</p>	<p>Support</p> <p>No specific decision requested</p>	Accept	<p>No changes required as a result of this submission point.</p>
38.3	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	<p>Rules that may be appropriate for the extensive high country estate (e.g. Rules 6.3.1 and 6.3.2 on pp.35 and 36) will have perverse effects if applied in a settlement area. For example, proposed Rule 6.3.2 could see all amenity plantings of conifers removed from the Village reserves, and possibly in a very short time frame, without any requirement for consulting the community.</p> <p>Castle Hill Village was planned and implemented in the late 1970s as an alpine</p>	<p>Amend footnote 3 on page 15 and footnote 12 on page 35 to read: "Wilding conifers are any introduced conifer tree that has been declared by Ecan to have a significant risk of spreading, including ...."</p>	Reject	<p>We are satisfied with the existing definition of wilding conifers, as it properly defines the issue being managed. We note that exemptions can be applied for, but these need to be looked at very carefully as to whether they achieve the objectives of the RPMP. Significant care needs to be taken in that process not to compromise investment in existing control activities.</p>

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	<p>village with special character, including a written consent requirement to plant 6070 exotic species as part of the development. Trees, including exotic trees, provide a range of amenity values in the Village: shade, wind protection, play areas for children, important for village bird life, and visual attractiveness. Anyone familiar with Castle Hill Village will know the landscape contribution of the larch trees, particularly in autumn.</p> <p>Unlike almost all the extensive high country, Castle Hill Village has active reserves management in place, underpinned by the Reserves Management Plan adopted in 2011. This plan is overseen by the Selwyn District Council, and has already been active for five years in removing p.contorta and replacing with beech and other plantings.</p> <p>The Village community has already agreed to the phased elimination of p. contorta over a time-frame that is currently under consideration, and well within the 10-year time-frame envisaged by the proposed RPMP. Furthermore, it has long been accepted by Village property owners that all trees in Village reserves require active management over time in order to optimise their amenity values.</p> <p>The Reserves Management Plan is currently being reviewed by the Village. This will provide the opportunity not only for community consultation within the Village, but also to ensure that the Village RMP aligns with the proposed RPMP in terms of the latter's purpose and objectives, and cognisant of the level of risk associated with wildings in the Village.</p> <p>We request that a duly revised Reserves Management Plan continue to be the primary instrument for managing wilding tree species in the Village, assuming that such revision:</p>			
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		<p>(a) aligns the Village Plan with the purpose and objectives of the RPMP; and</p> <p>(b) includes an explicit Good Neighbour Rule (As defined in the RPMP Glossary on p.99 and acknowledging specified criteria.) governing the pest management responsibilities as they relate to the relationship between the Village and its rural neighbour properties, specifically Castle Hill Station and the Department of Conservation.</p> <p>With this in mind, we recommend that within residential settlement areas that have reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme<sup>5</sup>, wilding conifers be exempt from the Pest Management Plan provisions.</p>			
38.4	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	See submission point 38.3	<p>Amend rule 6.3.1 by adding a subclause (c) That amenity planting within council controlled reserves not be subject to this rule provided that there is a reserves management plan that:</p> <p>(a) aligns the Village Plan with the purpose and objectives of the RPMP; and</p> <p>(b) includes an explicit Good Neighbour Rule (As defined the RPMP Glossary on p.99 and acknowledging specified criteria.) in governing the pest management responsibilities as they relate to the relationship between the area covered</p>	Reject	We do not consider it appropriate to include an exemption for Castle Hill Village within rule 6.3.1. We note that exemptions can be applied for under s 78 BSA based on individual circumstances, but these need to be looked at very carefully as to whether they achieve the objectives of the RPMP. Significant care needs to be taken in that process not to compromise investment in existing control activities.

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			by the plan and its rural neighbouring properties		
38.5	Township Committee of Castle Hill Village, representing the Castle Hill Community Association - Robert Murfitt	See submission point 38.3	Amend rule 6.3.2 by adding except that any reserve subject to clause (c) of Rule 6.3.1 shall be exempt from this rule	Reject	Refer to submission 38.4.
39.1	Summit Road Society Inc. - John Goodrich	<p>We wish to amend the list of pests by including spur valerian (<i>Centranthus ruber</i>), tree lucerne (<i>Cytisus proliferus</i>) and Douglas fir (<i>Pseudotsuga menziesii</i>).</p> <p>All these have a marked impact on the regeneration of native plant species. Spur valerian is becoming a serious threat to important and in some cases threatened plants on rocky bluffs and cliffs on Banks Peninsula and the Port Hills.</p>	Amend provisions to include spur valerian, tree lucerne and Douglas fir on the list of pests	Accept in part	Wilding Douglas fir and Douglas fir in the Wilding Conifer Containment Area are identified as pest species and pest agent species respectively. We do not currently have sufficient information on the impact of wilding pines on Banks Peninsula to be able to add them to the wilding conifer containment area identified in the appendices. Provisions are, however, included as to how site-led programmes can be implemented.
39.2	Summit Road Society Inc. - John Goodrich	We want Douglas fir ( <i>Pseudotsuga menziesii</i> ) to be added to the list of pests to be dealt with by progressive containment.	Amend provisions to add Douglas fir to the list of pests to be dealt with by progressive containment.	Accept in part	Refer to submission 39.1.
48.1	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Wilding conifers, due to their characteristics of size, seeding capabilities and ease of removal, can be eradicated from an area much more readily than other pest species. This is recognised nationally under the New Zealand Wilding Conifer Management Strategy which “aims to prevent the spread, contain or eradicate wilding conifers by 2030”. A progressive containment programme in Canterbury is unlikely to achieve the aim of the national strategy by this date.</p> <p>There is little point in trying to “contain” wilding conifers – particularly lodgepole/contorta which can spread more rapidly than any other conifer</p>	<p>Oppose</p> <p>Amend Table 3: Organisms classified as pests, as follows: Pg15 – In Table 3, amend the Primary programme from ‘Progressive Containment’ to ‘Eradication’</p>		<p>We accept the Council's evidence that there are areas within the Wilding Conifer Zone that will be managed to achieve an eradication objective (where technically feasible), noting that this will be achieved by proactive control work that is not detailed in the RPMP.</p> <p>It is not achievable to meet the eradication objective within the Wilding Conifer Zone over the life of the RPMP as this relies on significant ongoing funding of the proactive control programme from all funders.</p>

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		<p>species, out to distances of many kilometres from the seed source. An attempt at “containment” of wilding conifers will continue, ad infinitum, to cost inordinate amounts of money to remove the wildings generated from any new, growing, seed-source.</p> <p>Eradication should be the primary pest management programme for wilding conifers under the pRPMP. An eradication programme is the most cost-effective use of taxpayer and ratepayer money overtime. This is recognised by DoC who list wilding conifers as Enemy Number 1 in their War on Weeds and the allocation of \$16 million over 4 years through MPI for a national control programme.</p> <p>WELRA supports ECan’s commitment to removing wilding conifers and their seeding sources from the region but proposes that, by working in partnership with communities, central government agencies, and other donors, that eradication of wilding conifers is possible and should be the aim of the pRPMP.</p> <p>The wilding conifer invasion has an end-point which will be achieved when all seed-source trees and their pre-coning progeny are removed. As the soil seed bank is short-lived (cf., gorse and broom), if these emerging trees are removed before coning age, then the wilding conifer issue ceases to exist. The cost of controlling wilding conifers per hectare does not change between progressive containment and eradication programmes – the only real difference is the wildings that are targeted and volume of work required.</p> <p>The control costs for wilding conifers increases significantly for each year that the trees are left to grow and spread. A policy of containment in the pRPMP will not support the national strategy and will burden ratepayers with ever mounting costs for future generations.</p>			
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		<p>In addition, the full environmental and social cost of wilding conifers is not considered in the cost-benefit analysis undertaken for this Proposal. One of the most significant impacts of wildings is on natural landscape values. Canterbury is home to nationally significant vistas and landscapes, most of which are under threat from wildings. While it is not possible to calculate the financial cost, the loss of these landscapes would have major economic as well as environmental and social impacts.</p> <p>It is financially imperative therefore to invest funds into early eradication. Equally important is the requirement to instigate and implement a supportive legislative system that directs the removal of all wildings conifers and supports the investments made into eradication to date. Consequently, WELRA submits that the Proposal is amended so that the Primary pest management programme for wilding conifers is Eradication.</p>			
48.2	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	See submission point 48.1	<p>Oppose</p> <p>Insert in Table 3, 'Yes' into the Good Neighbour Rule (see submission point 48.4 for details)</p>	Accept	We have included good neighbour rules for wilding conifers.
48.3	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	See submission point 48.1	<p>Oppose</p> <p>Amend page numbers according to Eradication programme classification</p> <p>If adopted, this submission will also require changes to the current wording and location of wilding conifer sections of the Proposal.</p>	Reject	Refer to submission 48.1.

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			<p>Relevant sections of the Proposal effected include:</p> <ul style="list-style-type: none"><li>• Part and Page: Part 6, pg26-30, 6.2 Pests to be managed under eradication programme, Table 8, Table 9, and Table 10 Amend to include wilding conifer content that is currently proposed under progressive containment programme. Amend to describe collective management approach to eradication of wilding conifers between community, local and central government agencies.</li><li>• Part and Page: Part 6, pg31, 33-34, 6.3 Pests to be managed under progressive containment programme, Table 11, Table 12 and Table 13 Related to above, removal of wilding conifers from progressive</li></ul>		
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			<p>containment programme.</p> <ul style="list-style-type: none"> <li>Part and Page: Part 6, pg35-36, 6.3 Pests to be managed under progressive containment programme, Table 13, Plan Objective 4 Amend Plan Objective 4 to reflect community driven collaborative and coordinate response to wilding conifers to achieve eradication.</li> <li>Part and Page: Part 7, pg68-69, 7.1 Measuring achievement of objectives, Table 32: Monitoring objectives</li> </ul> <p>Amend according to change in primary pest management programme.</p>		
48.4	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>This section identifies various pests that are subject to Good Neighbour Rules (GNR). These rules are intended to support properties where pest control works have been undertaken. This submission is in part opposition because of the exclusion of wilding conifers from the list of GNR.</p> <p>Rule 6.3.2 is not currently noted as a GNR but requires the neighbours of a property that have been controlled using public funds, to eradicate wildings within 200m of the property boundary. WELRA would submit that this is a GNR rule</p>	<p>Oppose</p> <p>Amend the Proposal pg20 (and any other page where this list is stated in the Proposal) by the inclusion of wilding conifers in the list of pests subject to GNR:</p> <p>Pg20 – The pests subject to GNR's include Bennett's wallaby, feral</p>	Accept in part	Refer to submission points 48.1 and 48.2.

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		<p>and should be identified as such, both in the reference list on pg20 and noted within Rule 6.3.2.</p> <p>While WELRA understands that wilding conifers are subject to a variety of pest control programme structures and management systems, being included in the GNR system will support control works completed to date and help contain the spread.</p> <p>Failure to categorise Rule 6.3.2 as a GNR; coupled with a land occupier's requirements under proposed Rule 6.3.1 and a proposed progressive containment programme; could inadvertently burden some land occupiers with ongoing financial costs if the neighbouring properties are not required to remove coning wildings. Ironically, the occupiers unfairly burdened with costs will be the properties who have already done the right thing and controlled the pest on their property.</p>	<p>rabbit, broom, gorse, old man's beard, and nassella tussock and wilding conifers.</p> <p>Pg15 – In Table 3, insert 'Yes' into the Good Neighbour Rule</p> <p>Pg36 – addition of Note: This is designated a Good Neighbour Rule to Rule 6.3.2</p>		
48.5	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Rule 6.3.1 is intended to support control works already completed by ensuring any land occupiers maintain the controlled status of the land. Ie if public money has been utilised, the occupier must ensure wilding conifers do not re-establish. WELRA supports in part this regulatory framework as it encourages occupiers to maintain land in a wilding free state. However, WELRA proposes that this framework should provide support to all wilding conifer control work, whether publicly or privately funded. By removing condition (b), this rule will support and maintain all wilding conifer control work throughout Canterbury and assist with halting the spread quicker.</p> <p>In addition, under a progressive containment programme, any occupier of land that has received public funded control works is liable for the ongoing costs associated with the containment of the spread. A policy of eradication will ensure these land occupiers</p>	<p>Support in part</p> <p>Delete part (b) of Rule 6.3.1</p>	Reject	<p>We accept the Council's position that it supports the intention behind this request in terms of keeping publicly funded cleared land, clear. However, the Council advised that it does not currently have the ability or the capacity to monitor and enforce maintenance conditions for private wilding conifer control works.</p>

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		are not burdened with control costs and responsibilities in perpetuity.			
48.6	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>The purpose of Rule 6.3.2 is to support control efforts already undertaken. Where control works have been completed, any neighbour to those works can be instructed to remove wildings within 200m of the property boundary. WELRA supports in part the intent behind this rule and believe it is a 'good neighbour rule' and should be classified as such in the Proposal.</p> <p>However, particularly with the most invasive conifer species, contorta, this will be totally ineffective as seed source trees can be many kilometres up wind. The seed source of the infected area must be eradicated otherwise the downwind property will be obliged to undertake control works in perpetuity, particularly when considering the requirements proposed Rule 6.3.1.</p> <p>The proposed 200m limit will not achieve the intent of the rule, which is to protect gains made in halting the conifer spread. As conifer seeds can travel many kilometres in strong north-west winds, the proposed distance must be increased to achieve the desired intent behind the rule. To be effective, and to not unfairly burden some properties, WELRA proposes to amend Rule 6.3.2 to state 5km upwind or 200m in any other direction. This will allow the targeting of seed source sites that are impacting on neighbouring properties and will enable the effective containment or eradication of wilding conifers.</p>	<p>Support in part</p> <p>Amend rule 6.3.2 to include the note: This is designated a Good Neighbour Rule</p> <p>Amend rule 6.3.2 to state 5km upwind or 200m in any other direction.</p>	Accept in part	A good neighbour rule has been included, however we accept the Council's position that a 5km upwind boundary potentially imposes significant costs on landowners. We note that non-regulatory approaches may be successful in this area, and that monitoring is undertaken to confirm or otherwise the effectiveness of the proposed rule distances.
48.7	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) -	Eradication is achievable with the right mobilisation of resources and a strong supporting legal framework. WELRA supports in part the direction of the Proposal in relation to the wilding conifer threat, but believes more	<p>Support in part</p> <p>Insert new rule, 6.3.3 (or equivalent wording):</p> <p>Plan Rule 6.3.3</p>	Accept in part	We have included a pest agent conifer rule. We proposed, in the course of the hearings, a set of rules that might achieve what the submitter was seeking, however, we accept the Council's opposition on that proposal, which reserved discretion to the Council as to whether a group of trees were a seed source. The Council provided, in the

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	Neil Walkinshaw	<p>can be done in the framework of the Proposal to control and eradicate the spread.</p> <p>WELRA proposes the addition of a new rule (proposed Rule 6.3.3) that allows for the targeting and removal of major seed source trees sites. A cluster of coning conifers on an exposed ridge can spread thousands of viable seeds many kilometres each season. These key locations have a significant impact on the rate of spread. Removing these key seed source sites is vital in any wilding conifer pest management programme and is key to reducing overall control costs. Under this proposed rule it is recommended that an Authorised Person can provide written direction to a land occupier to destroy any seed source conifers that are contributing to the spread.</p> <p>This will give ECan the authority to remove major seed source sites which will reduce the rate of the spread and support the objectives of a progressive containment programme. However, by having the authority to control key seed source sites, an eradication programme is also achievable in the lifetime of the pRPMP.</p>	<p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all coning wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy where those trees contribute to the wilding conifer spread.</p>		<p>draft, a new rule 6.3.4 identifying conifer species as pest agents in the Wilding Conifer Containment Area.</p> <p>We consider that new pest agent Rule 6.3.4 will go some way to achieving containment. This will be monitored, and reviewed over the course of the next 10 years.</p>
48.8	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) - Neil Walkinshaw	<p>Wilding Conifers:</p> <p>The pest species list includes conifer species that have no commercial value. However, although a species with commercial value, Douglas fir also is a vigorous wilding-spread species responsible for many hectares of wilding invasion.</p>	<p>Amend wilding conifer provisions to include Douglas fir in the list of pest species when the seed escapes beyond the planted area and establishes seedlings in neighbouring property(s).</p>	Accept	<p>The definition of wilding conifer includes any introduced conifer species in its wilding form.</p>
48.9	Waimakariri Ecological and Landscape Restoration Alliance (WELRA) -	<p>Plan Rule 6.3.2</p> <p>There is a statement – “..... present on land they occupy within 200m of an adjoining property boundary prior to cone bearing if control operations to clear wildings .....</p>	<p>Amend rule 6.3.2 to expand the neighbouring boundary distance for wilding conifers from “200m” to “5 km”.</p>	Reject	<p>Refer to submission 48.6.</p>

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	Neil Walkinshaw	The “200m” distance from a neighbouring boundary, under the GNR requirements, is far too short for the most vigorous of the spreading species - lodgepole pine. In Canterbury, lodgepole pine seeds have spread up to 10km from their seeding parent trees as has happened at Craigieburn/Flock Hill Station.			
51.1	Simpson, Douglas	<p>Whilst along with all Mt Lyford Village owners we are concerned about the spread of wilding conifers we are handling this problem ourselves.</p> <p>The covenants for Mt Lyford village have both Larch and Douglas Fir on the planting list. There are also commercial forests adjacent to the village.</p> <p>Our residents have set up our own society to tackle this problem. We do not wish Ecan to be involved as their track record on broom and gorse in our area is dismal. We have in the past controlled our own weeds and would be concerned that Ecan will force us to remove some of our specimen conifers and adjacent forests.</p>	<p>Oppose</p> <p>Amend provisions to not involve ECan in wilding conifer control for Mt Lyford Village or require removal of our specimen conifers and adjacent forests.</p>	Reject	Refer to submission 38.4, we consider the same provision for exemptions could apply to Mt Lyford, but that would need to be considered on a case-by-case basis.
52.1	Ledgard, Nick	Support general dealing with wilding conifers as progressive containment pests.	<p>Support</p> <p>No specific decision requested</p>	Accept	Accepted to the extent the provisions have been modified in response to other submissions.
52.2	Ledgard, Nick	Corsican pine is a useful shelter species, the attributes of which (eg., low maintenance) is not replicated in other species. It is present in many improved pasture situations where its spread risk is low (eg., Glenthorne, Castle Hill and Grasmere).	Amend wilding conifer provisions to all for the retention of Corsican pine (and even planting) in low spread-risk situations	Reject	We note that exemptions can be applied for in certain circumstances, and considered on case by case basis.
52.3	Ledgard, Nick	Douglas-fir. A high spread-risk species. I fully appreciate the problems with treating D-fir as a pest, particularly when in commercial plantations. But there are many farm situations where its removal / replacement is viable, and	Amend wilding conifer provisions to further consider of how to deal with D-fir in farm situations, where removal	Reject	General rules have been applied in the Wilding Conifer Containment Area. We consider that these will be appropriate and control of conifers can be undertaken in accordance with the rules. The Council has also advised that it will work on non-regulatory approaches, such as

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		where notification of such to land occupiers is warranted.	and replacement with less spread-prone species is viable.		education and communication, to encourage good management of conifer species in these areas.
53.16	Rural Advocacy Network - Jamie McFadden	Wilding pines: are a significant threat to landscapes & biodiversity particularly in the high country. We support increased effort on the eradication of wilding pines. There needs to be a greater emphasis on a regional & national strategic approach to the wilding issue. The transfer of land to the conservation estate through tenure review, the fencing of native bush, shrublands and waterways by landowners and the decrease in livestock grazing pressure are all aiding the spread of wilding trees.	Support  No specific decision requested	Accept	Accepted to the extent the provisions have been modified in response to other submissions.
67.3	Selwyn District Council - Lisa Arnott	Selwyn District Council supports wilding Pines being identified and listed as a pest species, and the proposed methods of controlling these species. Residents within Selwyn District have expressed concern about the adverse effects that Wilding Pines have on the environment, particularly Contorta and Larch.	Support  No specific decision requested	Accept	Accepted to the extent the provisions have been modified in response to other submissions.
67.4	Selwyn District Council - Lisa Arnott	Selwyn District Council supports the forestry pines Douglas fir and Radiata pine being excluded from the list of pest conifers. The proposed Plan is not considered to restrict the ability for forestry activities to continue to operate within Selwyn District, but is consistent with the need to protect these activities against wilding pines.	Support  No specific decision requested	Accept	We do note that, however, that Douglas fir and Radiata will be subject to the pest agent rule 6.3.4 in the RPMP (except where they are part of a plantation forest).
67.7	Selwyn District Council - Lisa Arnott	Selwyn District Council recommends the following amendments be made to the Plan: Within Alpine urban development reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme, wilding conifers shall be exempt from the Pest Management Plan provisions.	Amend the RPMP to exempt Alpine urban development reserve areas with approved Reserve Management Plans that include a tree maintenance and management programme	Reject	Refer to submission 38.4.



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			from wilding conifer RPMP provisions.		
67.8	Selwyn District Council - Lisa Arnott	Selwyn District Council recommends the following amendments be made to the Plan: Trees protected under the SDC District Plan shall be excluded from enforcement under the Pest Management Plan.	Amend the RPMP to exclude trees protected under the SDC District Plan	Reject	Refer to submission 38.4.
69.1	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	<p>The Mackenzie Basin Wilding Tree Trust supports Objective 4 in the proposed Canterbury Pest Management Plan. However, there is a concern that the wording of Rule 6.3.1 may have the effect of causing landowners to opt out of public funding because of the potential impact of the ongoing obligations it entails, thereby hindering the implementation of the eradication plan. In particular:</p> <p>As rule 6.3.1 is currently worded, “occupiers” of land may be forced to remove all wilding conifers present on property they occupy, prior to cone bearing, even if the public funding was only received to remove or destroy wildings on a small area (“in part”) of their property. In the Trust’s view, the wording should be changed to clarify that the areas that are required to be kept clear of cone bearing wildings under this rule are those areas to which public funding has been allocated, rather than, as could be implied by the current wording, the whole property.</p> <p>On properties where wilding spread is very dense and the trees have reached maturity, once initial clearing has been undertaken, experience has shown that there will normally be a heavy regeneration of wildings from previously scattered seed. This initial regeneration may also be quite dense</p>	<p>Amend rule 6.3.1 as below:</p> <p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers present on the areas of the land they occupy where publicly funded clearing has occurred prior to cone bearing, if –</p> <p>(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines, and larch are located on land where control operations to clear wilding conifers have been undertaken; and</p>	Accept in part	The revised wording has been included in the decision, with minor amendments in response to other submissions, for the reasons set out in the submission.

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		and wide spread, and be beyond the financial capacity of an 'occupier' to undertake a second or even third clearing if the occupier is unable to manage that land to minimise this re-infestation. To address the concern of a disconnect and often contradiction between District and Regional Councils, Doc, Ecan and LINZ there needs to be consistency in rules regarding intensification of such vulnerable land.			
69.2	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	See submission point 69.1	<p>Amend rule 6.3.1 as below:</p> <p>(b) The control operations were publicly funded (either in full or in part).</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act, unless the occupiers are unable to manage such land so as to minimise its re-infestation by wilding conifers.</p>	Reject	We accept the Council's position that this addition may risk non-achievement of the objective for progressively reducing wilding conifers and the Council does not consider that this would be appropriate. The ability to maintain the initial control programme should be assessed before the control operation is confirmed.
69.4	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	<p>The Mackenzie Basin Wilding Tree Trust is of the opinion that unless funding from government is increased considerably in future budget allocations then the following statement in the "Alternatives considered" would be true.</p> <p>"Eradication over the 20-year time period of the Plan is not technically possible."</p>	No specific decision requested	Reject	While this point is noted it does not form a final part of the RPMP.
69.5	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	The Mackenzie Basin Wilding Tree Trust supports Rule 6.3.2 and the explanation of it.	<p>Support</p> <p>No specific decision requested</p>	Accept	Accepted to the extent the provisions have been modified in response to other submissions.

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69.6	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	The Mackenzie Basin Wilding Tree Trust supports the submission made by WELRA (the Waimakariri Ecological & Landscape Restoration Alliance Inc), except for their submission on Plan Rule 6.3.2 in which they submit that “The neighbouring boundary distance for wilding conifers be expanded from 200m to 5km”. We support the existing 200m distance that is already part of this rule.	No specific decision requested	Accept	Refer to submission 48.6.
74.1	Federated Farmers - Lynda Murchison	<p>Federated Farmers strongly supports the proposed Good Neighbour Rules which will bind the Crown (namely Department of Conservation (DOC) and Land Information New Zealand (LINZ)) to the requirements of the proposed RPMP for wallabies, broom, rabbits, gorse, nasella tussock and old man’s beard. Many farmers within the region have a boundary with Crown land and because of the nature of Crown land use and management suffer the impact of pest spread across the boundary. Federated Farmers has long questioned the exclusion of the Crown from regional pest management responsibilities as pest species do not recognise legal boundaries. For this reason, Federated Farmers applauds the efforts of Regional Councils to bind the Crown to the collective management of these pest species.</p> <p>In addition to the proposed species, Federated Farmers strongly recommends that the various wilding conifer species are added to the Good Neighbour Rule list in regards to the following boundary clearance rule; ‘Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from an Authorised Person, destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers have been undertaken on the adjoining property, within 200m of the</p>	<p>Support in part</p> <p>Insert a new rule for wilding conifers to the Good Neighbour Rule category for the boundary control rule listed above.</p>	Accept	A new good neighbour rule 6.3.3 has been included.

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		<p>boundary, since the commencement of the Plan.'</p> <p>Given the National Wilding Conifer Management Strategy, to which Federated Farmers, DOC, LINZ and Environment Canterbury are all stakeholders, it seems illogical to not include a Good Neighbour Rule for the management of these prolific pest species.</p>			
77.1	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports the list of organisms classified as 'pests' in Section 4.1. LINZ however notes that some wilding conifer species such as pinus radiata and Douglas Fir are commercial species, and therefore technically not a 'pest', but rather 'pest agents'. Consequently, LINZ considers it should be made clearer in Section 4.1 those species which are 'pest agents' which are subject to control in the Plan.</p> <p>LINZ also considers that Russell lupin should be added as a 'pest agent' in section 4.1, table 3. The reasons for inclusion of Russell lupin and associated controls in the Plan, is addressed elsewhere in this submission.</p>	<p>Support in part</p> <p>Retain the organisms declared as 'pests' in section 4.1, however make it clearer as to those commercial species which are 'pest agents', including pinus radiata and Douglas fir.</p>	Accept	<p>The new pest agent Rule 6.3.4 applies to Douglas fir and Pinus radiata, except where they are in a forestry plantation.</p> <p>We consider that new pest agent Rule 6.3.4 will go some way to achieving containment. This will be monitored, and reviewed over the course of the next 10 years.</p>
77.3	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports the definition of 'wilding conifer' on page 15 of the Plan, and the related list of introduced conifer trees set out in Table 4. LINZ in particular supports naturally occurring Pinus radiata and Douglas fir being included in table 4 and the definition of 'wilding conifer'. Douglas fir is a particularly invasive species. Their inclusion will ensure they are managed under objective 4 and rules 6.3.1 and 6.3.2, where they are outside of forestry plantations.</p> <p>LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, water yield and production values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to</p>	<p>Support</p> <p>Retain the definition of 'wilding conifer', and the list of introduced conifer trees in table 4.</p>	Accept	No changes required as a result of this submission.

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		progressively contain and reduce wilding conifers in Canterbury, in support of the National Wilding Conifer Management Strategy 2015 – 2030.			
77.4	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports objective 4 and related rules 6.3.1 and 6.3.2 seeking the progressive containment and reduction in the geographic distribution or extent of wilding conifers.</p> <p>LINZ however considers that rules 6.3.1 and 6.3.2 as currently worded are unclear and uncertain. LINZ considers that the trigger for when wilding conifers are to be destroyed should instead refer to where 'they have previously been cleared through control operations', rather than where control operations have been undertaken so as to align with the intent of objective 4.</p>	<p>Support in part</p> <p>Retain objective 4</p>	Accept	Accepted, except to the extent the objective has been modified in relation to other submissions.
77.5	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.4	<p>Amend rule 6.3.1(a) as follows:</p> <p>(a) The wilding conifers, contorta, Corsican, Scotts, mountain and dwarf mountain pines and larch are located on land where control operations to clear wilding conifers have been undertaken they have previously been cleared through control operations; and</p>	Accept in part	Accepted, except to the extent the Rule has been modified in relation to other submissions.
77.6	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.4	<p>Support in part</p> <p>Amend rule 6.3.2 as follows:</p> <p>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 3, occupiers shall, on receipt of a written direction from</p>	Accept in part	Accepted, except to the extent the Rule has been modified in relation to other submissions.

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			an Authorised Person, destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers have been undertaken they have previously been cleared through control operations on the adjoining property, within 200m of the boundary, since the commencement of the Plan.		
78.9	Department of Conservation - David Newey	See submission point 78.10	Support in part  Amend provisions in the RPMP to include Banks Peninsula in the Progressive containment programme	Reject	<p>We did not receive sufficient information on wilding conifers in relation to Banks Peninsula, and council noted that the peninsula is not part of the National Wilding Conifer Programme. However, we note the following paragraph has been added to the site-led programmes section which may assist the submitter:</p> <p><i>Additional site-led programmes may be developed beyond the commencement of the Plan. These may be non-regulatory and managed outside of the Plan, or they may require regulation to ensure the objective is met. If regulation is required, a review of the Plan may be required. The scope of the siteled programme will determine the extent of the review process. In particular, the scale of the impacts on persons who are likely to be affected by the programme will be a key consideration in the extent of consultation that is required.</i></p>
78.11	Department of Conservation - David Newey	There may also be instances where coning wilding conifers need removal.	Support in part  Amend provision 6.3.1 to include coning wilding conifers within the rule or	Reject	We accept the Council's evidence that the intention of Rule 6.3.1 is to keep land that has been cleared of wilding conifers clear, and subsequent maintenance needs to occur prior to coning. There should not be any instances of coning

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			have an additional rule for coning wilding conifers.		wilding conifers present in the area after the initial control operation has been completed.
78.12	Department of Conservation - David Newey	There are other areas where wilding conifer work is also undertaken and a good neighbour rule should also apply outside the wilding conifer containment area	Support in part  Amend rule 6.3.2 to include areas outside the wilding conifer management area, or, add a rule for areas outside the wilding conifer containment area.	Reject	Refer to submission 78.9.
78.37	Department of Conservation - David Newey	Wilding conifers. Beneficiaries and exacerbators are not fully identified for wilding conifers in table 35. In the supporting analysis of costs and benefits, hydro benefits and benefits for irrigated land amount to 50% collectively. Active exacerbators are those who plant wilding conifers for woodlots, carbon forests, shelter, and, amenity plantings. These include the planting wilding conifer species and those species considered as “pest agent” species such as Douglas fir. These types of planting are seed sources for distant spread in high winds. The result is substantial ongoing expenditure is required to carry out surveillance and control of scattered wilding conifers over large areas to prevent wilding conifer spread. This is a significant cost for Crown agencies and neighboring lands.	Support in part  Amend table to better identify active exacerbators, and identify water users as the main beneficiary of this work.	Reject	While this point is noted it does not form a final part of the RPMP.
82.5	Ministry for Primary Industries - Sherman Smith	MPI strongly supports Environment Canterbury’s ongoing commitment to the management of wilding conifers within the Canterbury region, and welcomes the expansion of its wilding conifer pest management programme to include a regulatory framework, which will support the collaborative operational control work that has been, and continues to be, central to the regional programme. This will also support key central and local government initiatives contributing to the implementation of the	Support  No specific decision requested	Accept	No changes required as a result of this submission.

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		<p>National Wilding Conifer Management Strategy 2015-2030, particularly the National Wilding Conifer Control Programme.</p> <p>MPI also supports Environment Canterbury's commitment to improving consistency in the regulatory components of regional councils' wilding conifer programmes, by utilising and adopting key parts of MPI's 2016 guidance document for wilding conifer pest management programmes within Regional Pest Management Plans.</p>			
82.6	Ministry for Primary Industries - Sherman Smith	MPI supports the specification of wilding conifers as pests and the definition used for wilding conifers, which is consistent with that set out in MPI's guidance on wilding conifers in Pest Management Plans (the MPI wilding conifer guidance).	<p>Support</p> <p>Retain the specification of wilding conifers as pests and the definition used for wilding conifers</p>	Accept	No changes required as a result of this submission.
82.7	Ministry for Primary Industries - Sherman Smith	MPI supports the specification of Contorta (lodgepole) pine, European larch (excluding sterile hybrids), Mountain pine, Dwarf mountain pine, and Scots pine as pests, which is consistent with the recommended approach set out in the MPI wilding conifer guidance on this matter. This is a positive step in the prevention of additional potential future wilding conifer spread, as it prevents new plantings of these particularly spread-prone conifer species.	<p>Support</p> <p>Retain the specification of named conifer species</p>	Accept	No changes required as a result of this submission.
82.8	Ministry for Primary Industries - Sherman Smith	MPI supports the specific reference to, and stated support for, the New Zealand Wilding Conifer Management Strategy 2015-2030. An integrated approach to wilding conifers will be important to the achievement of that Strategy's aims and objectives.	<p>Support</p> <p>Retain the specific reference to and stated support for the New Zealand Wilding Conifer Management Strategy 2015-2030.</p>	Accept	No changes required as a result of this submission.
82.9	Ministry for Primary Industries -	MPI notes and supports the specific acknowledgement of the issue of wilding conifer spread from conifer plantations and the	Support in part	Accept in part	The following sections have been included:



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	Sherman Smith	<p>need for ongoing engagement with stakeholders to find ways to manage this. This is an important and positive acknowledgement of this difficult issue.</p> <p>However, in recognition that the issue of wilding conifer spread from planted spread-prone conifer species in vulnerable parts of the region also relates to smaller plantings, such as shelterbelts and amenity plantings, MPI recommends an additional statement addressing this.</p> <p>In addition, MPI encourages Environment Canterbury to explore and consider potential different options (both regulatory and non-regulatory) for managing the risk of wilding conifer spread from future new plantings of spread-prone conifer species, particularly in parts of the region vulnerable to wilding conifer invasion.</p>	<p>Insert the following, or a similar statement, on page 31, immediately before Table 12:</p> <p>Environment Canterbury will also seek to engage with land occupiers to raise awareness about the wilding conifer spread risk from some conifer species used in shelterbelts and other smaller plantings, and in high spread risk areas and areas subject to wilding conifer control, support and encourage the removal of small, spread-prone conifer plantings.</p> <p>Consideration of options for managing wilding conifer spread risk from future new conifer plantings (large and small).</p>		<p><u>Environment Canterbury will also seek to engage with land occupiers to raise awareness about the wilding conifer spread risk from some conifer species used in shelterbelts and other smaller plantings, and in high spread risk areas and areas subject to wilding conifer control, and support and encourage the removal of small, spread-prone conifer plantings.</u></p>
82.10	Ministry for Primary Industries - Sherman Smith	MPI supports the description of pest and adverse effects outlined for wilding conifers and for the specific conifer species, as these are consistent with the MPI wilding conifer guidance.	<p>Support</p> <p>Retain the description of pest and adverse effects outlined for wilding conifers and for the specific conifer species</p>	Accept	No changes required as a result of this submission.
82.11	Ministry for Primary Industries - Sherman Smith	MPI supports the more specific, time-bound and measurable second part of Plan Objective 4, but suggests that the first part of the objective would benefit from greater clarity and/or specificity in terms of where containment and/or reduction will occur, and/or to what extent this will occur.	<p>Support in part</p> <p>Amend objective 4 to ensure more clarity and/or specificity, particularly in terms of where containment will occur,</p>	Accept in part	<p>The Council responded to us as part of the staff report accompanying the draft Plan on 8 December 2017. They agreed to amend the Objective to the following effect:</p> <p><i>Over the duration of the Plan, progressively contain by reducing the geographic distribution and extent of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch within the Canterbury region to</i></p>

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		<p>The Maps in Part 2 of the proposed RPMP show a Wilding Conifer Containment Area, but it is not clear whether Plan Objective 4 relates only to this Containment Area, or to the region as a whole. MPI suggests that, if the objective includes containment, it is important to specify the area or areas within the region to which the pest is intended to be contained.</p> <p>MPI suggests that section 8 of the MPI wilding conifer guidance, which sets out standardised programme objective statements, may be helpful in reviewing proposed Plan Objective 4.</p>	and/or to what extent reduction will occur.		<p><i>reduce adverse effects on economic well-being and the environment.</i></p> <p><i>Within the Wilding Conifer Containment Area shown on Map 1 in Appendix 4, 900,000 hectares of land will be cleared of wilding conifers within 10 years of the commencement of the Plan. This may involve the destruction of contorta, Corsican, Scots, mountain and dwarf mountain pines and larch.</i></p> <p>We accept the changes for the reasons set out in the staff report.</p>
82.12	Ministry for Primary Industries - Sherman Smith	<p>Clause 4(1)(a) of the NPD requires that the objectives in a Plan must state the adverse effect(s) of the pest that the Plan aims to address. MPI supports the reference in Plan Objective 4 to addressing adverse effects on economic well-being and the environment. However, because under a progressive containment objective there will still be some infestations or occurrences of the pest, it may be unrealistic to expect a progressive containment outcome to prevent adverse effects. Therefore, MPI suggests that a more appropriate term might be to “reduce”, or “limit”, or “minimise” adverse effects.</p>	<p>Support in part</p> <p>Amend objective 4 to consider replacing the word “prevent” with “reduce” or “limit” or “minimise”, or similar wording.</p>	Accept	Refer to submission 82.11.
82.13	Ministry for Primary Industries - Sherman Smith	<p>MPI supports the recognition of the contribution of the National Wilding Conifer Control Programme will make to achieving Plan Objective 4.</p>	<p>Support</p> <p>Retain the recognition of the contribution of the National Wilding Conifer Control Programme</p>	Accept	No changes required as a result of this submission.
82.14	Ministry for Primary Industries - Sherman Smith	<p>MPI strongly supports the inclusion of Plan Rule 6.3.1, as it provides for ongoing ‘maintenance’ control of wilding conifers (keeping cleared areas clear) following publicly funded control operations, thereby securing long term gains and a level of ‘protection’ of the public investment that has</p>	<p>Support in part</p> <p>Amend the wording of rule 6.3.1, in order to clarify whether the obligation is to remove all wilding conifers, or, all</p>	Reject	<p>We accept that the Council’s position that the rule is intended to support the initial work undertaken by previous control operations. The previous control operation would include removing all wilding and planted conifers of the named species. Therefore, the only new growth would be wilding conifers.</p>

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		<p>been made. However, MPI suggests that Plan Rule 6.3.1 may benefit from some amendments and/or clarification.</p> <p>Firstly, it is not clear whether the intended occupier obligation is just to remove all wilding conifers, or is to remove all wilding conifers and any planted conifers of the specified species. The intent here should be clarified by reviewing where in the rule reference is made to the specified conifer species. MPI suggests that consideration of the wording of Rule 3B in the MPI wilding conifer guidance may assist in this regard.</p> <p>Secondly, the reason for including the words "...on receipt of a written direction from an Authorised Person..." is unclear. In some instances, these words have been used within a rule to indicate that the rule is essentially a 'complaints based' rule, i.e. enforcement will generally be limited to instances where a complaint is received. MPI is concerned that if this is the intention in this case, this does not provide adequate long-term 'protection' in terms of keeping cleared areas clear. In the context of the situations in which this rule would apply, the obligation to destroy wilding conifers should apply regardless of the receipt of any complaint.</p>	wilding conifers and all planted conifers of the specified species.		
82.15	Ministry for Primary Industries - Sherman Smith	See submission point 82.14	Clarify if the intention behind including the words "...on receipt of a written direction from an Authorised Person..." in rule 6.3.1 is to infer enforcement on a 'complaints only' basis, remove these words from rule 6.3.1. If this is not the intention, then outline the reason(s) for inclusion of these words in the	Accept	Accepted, noting that the rule has been amended in response to other submissions.

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			accompanying Explanation of the Rule.		
82.16	Ministry for Primary Industries - Sherman Smith	MPI supports the inclusion of Plan Rule 6.3.2, which aims to reduce the 'externality' impacts of wilding conifer spread from adjoining properties, where an occupier is actively controlling wilding conifers. MPI suggests that there may be value in amending the wording of Plan Rule 6.3.2 to include reference to an occupier taking 'reasonable measures' to control wilding conifers, either instead of, or in addition to, reference to 'control operations to clear wilding conifers'. This may better cover situations where an occupier proactively and pre-emptively undertakes regular inspections, looking for and removing, wilding conifer seedlings, which may not be considered to be 'control operations to clear', but would likely fall within 'reasonable measures'. Reference to the type of things that constitute 'reasonable measures' could be included in the Explanation of the Rule, as per the NPD Guidance Material, Part 2 (especially clause 205 and 206).	Support in part  Amend rule 6.3.2 to read as follows: "Within the...prior to cone-bearing, if control operations to clear wilding conifers, or other reasonable measures to control wilding conifers, have been undertaken..."  Include the type of things that constitute 'reasonable measures to control wilding conifers' in the Explanation of the Rule.	Reject	The wording included is more specific and measurable regarding what 'reasonable measures' may have been undertaken.
82.17	Ministry for Primary Industries - Sherman Smith	Keeping clear areas clear is an important principle in achieving a progressive containment objective. Areas may be 'clear' of a pest for a number of reasons, such as due to specific control actions, particular land use activities, or the pest having not yet infested the area. Proposed rules 6.3.1 and 6.3.2 appear to aim to ensure that areas where wilding conifer control actions are undertaken will subsequently remain clear, and it appears that the parts of the region excluded from the proposed Wilding Conifer Containment Area are predominantly areas where the intensity and nature of land use will effectively prevent or minimise wilding conifer establishment. However, there are likely to be areas within the proposed Wilding Conifer Containment Area that are vulnerable to wilding conifer infestation, but which are currently clear of	Support in part  Add in a rule or rules requiring occupiers to remove wilding conifers within areas that are currently clear of wilding conifers, but are vulnerable to wilding conifer invasion. MPI suggests that Rules 1, 2 or 3A in the MPI wilding conifer guidance could potentially be used for this purpose.	Reject	We accept the Council's position that it does not have sufficient resources to monitor and enforce clearance for areas that are currently clear of wilding conifers. We note that this can potentially be achieved through non-regulatory approaches and partnerships.

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		<p>wilding conifers (or have only a very light, scattered presence). Given that the cost of wilding conifer control compounds significantly the longer any infestation is left uncontrolled, MPI is concerned that the proposed RPMP does not specifically address these clear but vulnerable areas. In such areas, a requirement that occupiers remove the pest prior to reproduction, can be an important</p> <p>‘regulatory back up’ to other education and advocacy type principal measures aimed at preventing new areas of wilding conifer infestation and halting the cycle of new ‘legacy’ areas of wilding conifers being created. The potential for such a requirement to impose an inequitable burden on occupiers due to an uneven spread of invasions is minimal if it is applied in areas where there is a high confidence that the pest is either not present, or present in only very light numbers. It is also possible to provide for an ‘alternative to compliance’ type agreement within a rule, which allows an alternative, negotiated approach to wilding conifer control, in the case of uncertainty about the level of infestation in parts of the area to which the rule applies.</p>			
82.18	Ministry for Primary Industries - Sherman Smith	MPI suggests that Plan users may benefit from some expansion of the reasons for Plan Rules 6.3.1 and 6.3.2, as set out in the Explanation of rules column of Table 13, particularly in relation to Plan Rule 6.3.2. Section 9 of the MPI wilding conifer guidance, which sets out standardised statements of intent for rules, may be helpful in this regard.	<p>Support in part</p> <p>Amend the explanations to rules 6.3.1 and 6.3.2 to expand on the standardisation statements of intents for rules.</p>	Accept	We accept the Council's amendments to the explanations in response to this submission.
88.8	Forest and Bird - Jen Miller	Wilding seed source from private land. The Ashburton Lakes area is virtually wilding free thanks to many hours of work weeding by volunteers. While this work is recognised by ECan and other agencies it is often described in terms of volunteers "enjoying days out doing wilding work"	<p>Oppose</p> <p>Amend rule 6.3.2 to reconsider the species and their spread. As currently worded the rule is not fit for purpose and in Forest &amp; Bird's view will</p>	Accept in part	While we acknowledge the difficulties with controlling seed source trees, due to potential distance of wind-dispersed seed, the new pest agent rule may go some way to dealing with concerns relating to Douglas fir and Pinus radiata species (although we note they do not apply to plantation forestry). We note that the definition of wilding conifer applies to all introduced conifer trees.

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		<p>This does not acknowledge both the organisation and considerable effort required to carry out wilding clearance, nor does it acknowledge the wider public's serious concern about the lack of action to control wilding seeding and spread.</p> <p>By way of an example Each main wilding area in the Ashburton Lakes that the Ashburton branch of Forest &amp; Bird has been working in is connected to adjoining shelterbelts or amenity planting on nearby private land. These trees include Pinus radiata and Douglas fir neither of which are included in the list of problem plants. Their wilding spread must be monitored and managed too. Both original seed sources are 200 metres away from the adjoining property and spread far beyond that.</p> <p>Elsewhere on the adjoining properties where there are single mature seeding trees on higher slopes, seeds can be windblown far beyond 200 metres and in the case of Douglas fir up to 127 km. There needs to be rules in place to control them.</p> <p>Around the Ashburton Lakes and other similar areas the wilding problem may appear minor and manageable and not a priority. Forest and Bird believes there must be a policy to prevent wildings foremost rather than a wait and see and deal with it later philosophy. It is more cost effective to first prevent seedlings and then deal with any small populations of trees as soon as possible. This type of work can be carried out by volunteer groups.</p>	not adequately control the significant biodiversity		
88.11	Forest and Bird - Jen Miller	It is not clear why Pinus radiata and Douglas fir have been excluded from the wilding trees listed in the Table. As described [in submission point 88.8] both species present a considerable wilding problem.	<p>Support in part</p> <p>Amend table 11 to add Pinus radiata and Douglas fir - Psudotsuga meniesii</p>	Reject	Refer to submission 88.8.

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91.1	Springford, Owen	<p>I challenge the provision of references to wilding conifers in the pest plan.</p> <p>In summary my view that Ecan has grotesquely over stated the negatives of wilding conifers and has not even mentioned the many positives.</p> <p>Low stature native plants are early stages in the process of ecological succession. There is no difference between the effect of dense wilding conifers and dense wilding Manuka/kanuka or Mountain beech forest on these low stature native plants. All of these forest types do not lead to extinction but to replacement by the next set of flora and fauna in the process that leads to climax native forest. The drying of wet lands and riparian areas is just the process of restoring the status quo antes.</p> <p>Wilding conifers will not replace healthy native ecosystems but will help restore those native forest ecosystems damaged by farming operations.</p> <p>Wildings species are particularly good at restoring soil carbon (organic matter) and mining nutrients from deep in the soil horizon, thereby increasing soil fertility and provide opportunities for native flora and fauna to thrive.</p> <p>The reality is that native forest species enjoy growing amongst exotic trees to such an extent that they can result in significant losses of exotic forest between planting and harvesting.</p> <p>There are truly magnificent Douglas-fir forests with full native understorey in Whakarewarewa forest that are enjoyed by tens of thousands of mountain bikers and walkers. Douglas-fir is our most valuable exotic species in terms of price per m3.</p>	Remove references to wilding conifers in the RPMP	Reject	<p>While the positive benefits of wilding conifers are acknowledged, such as carbon sequestration, they present a very significant threat to high country ecosystems and production values. We are satisfied on the evidence presented to us that on balance, rules and objectives in relation to wilding conifers, particularly as they relate to keeping controlled areas clear, are appropriate.</p>
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		<p>Wilding forests are very popular by campervan tourist for camping spots as they provide wind protection, privacy and can cope with human waste effectively. Mountain bikers particularly like exotic forests for riding in. The shores of Lake Pukaki were much better for being forested.</p> <p>Wilding exotics grow where there once were native forests. So they only are restoring the water flows to what they were. Furthermore, as with native forests, they improve all the water quality measures such as clarity and cleanness. They attenuate both water flow and water temperature fluctuations-important for instream biodiversity. Science indicates that there needs to be a buffer of at least 20 metres between intensive farming and water bodies in order to prevent sediment and nutrients entering those water bodies. Wildings can serve this function effectively and cheaply, while they serve as a nurse for native forest.</p> <p>Wildings forests are no more flammable than kanuka or mountain beech.</p> <p>Pine forests are the best source of mahinga kai in the form of huhus.</p> <p>Wildings will not grow in healthy pasture. The main reason wildings do grow is because the land and soil has been so badly degraded by farming malpractice over the last one and half centuries.</p> <p>If NZ is to meet its 2015 Paris emissions reduction targets it needs to plant around one million ha of new forest. In commercial forestry this would cost around \$1.5 billion (excluding land cost). Wildings will achieve the same goal free.</p> <p>We have put measurements in wilding stands that show that they can sequester carbon dioxide at the rate of 50-70 NZUs/ha per year. At \$20/NZU this means that these forest could</p>			
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		produce around \$1000/ha/year. DoC could produce enough revenue from wildings to completely control the mammalian pests sending much of our native fauna to extinction.			
92.3	McDonald, Fiona	Ten years is a significant timeframe that allows for specific replanting with appropriate native species.	Support Retain provision 6.3	Accept	Accepted to the extent that the provisions have been changed in response to other submissions.
92.4	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed.	Support Retain table 12	Accept	Accepted to the extent that the provisions have been changed in response to other submissions.
92.5	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed and to protect the publicly funded control operations.	Support Retain rule 6.3.1	Accept	Accepted to the extent that the provisions have been changed in response to other submissions.
92.6	McDonald, Fiona	Planted conifers would continue to produce wildings if allowed to continue to produce seed and to protect the publicly funded control operations.	Support Retain rule 6.3.2	Accept	Accepted to the extent that the provisions have been changed in response to other submissions.
92.7	McDonald, Fiona	If Castle Hill village was excluded from the requirements of the Plan the villagers and Selwyn District Council would become exacerbators as they would be wittingly allowing wilding spread.	Support  Retain RPMP provisions to ensure that all alpine developments within the Wilding Conifer Zone are included in the Plan.	Accept	Refer to submission 38.4.

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<b>Bennett's wallaby</b>					
<b>Number</b>	<b>Name</b>	<b>Submission</b>	<b>Relief</b>	<b>Decision</b>	<b>Reasons</b>
6.8	Ross, Fraser Bell	Bennett's Wallaby: probably the most serious pest we have which affects bush, native forests and other indigenous vegetation. And wallabies have spread widely in recent years and their numbers have build up markedly with impacts for the natural environment. So while the proposed rules, for wallabies, are supported, more needs to be done to control and reduce their numbers in all areas, including within natural stands of native bush and native forests. Sustained control would be supported.	Support in part  Amend provisions to provide for the sustained control of Bennett's wallaby in all areas.	Accept	We note that the Council filed a late supplementary staff report dated 8 February 2018 seeking amendment to the provisions which address the submitters concerns. We accept the changes as set out in paragraph 8 of that report, for the reasons set out in the report.
17.1	QEI National Trust - Rob Smith	Wallabies have caused and continue to cause significant browsing damage in QEI National Trust covenants that are found along the Hunter Hill eastern slopes. We have seen the current legislative and management approach undertaken by all the responsible local and regional authorities as well as local landowners often not being that effective. The reasons for this lack of impact on the wallaby population is that wallabies need to be in high numbers before control methods are used, by this time, even if we manage to get a coordinated approach from all the landowners (not an easy task) much of the damage has been done and the lower levels of the bush are effectively stripped bare.	Amend wallaby provisions to enable the regional council to lead and have the authority to coordinate wallaby control	Accept	We note that the Regional Council is identified as the management agency for this pest. It has the ability to control pests as set out in the Biosecurity Act.  We note that the Regional Council intends to investigate whether a wallaby control unit should be established. Refer to submission 42.3.
18.13	Frank, Hermann	The measures for Bennett's wallaby are strongly supported. However, I oppose the condition under Plan rule 6.4.2 'where the occupier of adjacent land is taken reasonable steps to manage wallabies on their land'. Plan rule 6.4.1 should apply to all land in the Containment Area.	Amend rule 6.4.2 to apply to all land in the Containment Area	Reject	Rule 6.4.2 is specifically a good neighbour rule, which can only be enforced under a number of conditions, one of which is where the occupier of adjacent land is taking reasonable steps to manage the pest. Rule 6.4.1 requires all land to be kept at or below level 3 on the Guilford Scale regardless of neighbour control. However, rule 6.4.1 does not apply to the Crown, whereas 6.4.2 does.

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18.14	Frank, Hermann	Also, it would be more effective and guarantee better outcomes, if the control programme would be coordinated by the Regional Council and paid out of a mixture of general and targeted rate. The current RPMS has not achieved to control the spread of this highly mobile species.	Amend provisions for the control programme for wallabies to be coordinated by the Regional Council and paid out of a mixture of general and targeted rate.	Accept	The funding for wallaby control is proposed to be 50% general and 50% targeted rate. Refer also to submission 17.1.
27.3	Taylor, R E	It is very important to control wallabies' spread into Canterbury. They should if possible be eliminated north of the Waitaki as they represent a significant threat to the few remnants of native bush that survive on our lowlands. I manage a 3HA one of these QEII bush covenants at Geraldine and can only afford to trap/kill possums and fence it against wandering sheep and goats, not jumping wallabies or deer.	Amend provisions to eliminate wallabies north of the Waitaki	Reject	We accept the Council's position that without further significant investment, sustained control is the only achievable objective currently for Bennett's wallaby in South Canterbury.
42.3	Ashburton District Biodiversity Working Group - Bert Hofmans	<p>We oppose the proposed implementation measures for controlling Bennetts Wallaby.</p> <p>Members of conservation groups within the Ashburton area have noted with alarm, the spread and increase in numbers of wallabies in South Canterbury. Recent sightings close to the south bank of the Rangitata, and on the south side of the Waitaki are seen as an indication that current control measures are not effective. There is a real concern that Wallabies will cross the Rangitata very soon and the effect of their browsing habits on the sensitive ecosystems of the Hakatere Conservation Park have the potential to be catastrophic.</p> <p>That three men can go onto a single property and shoot 250 wallabies in a weekend (pers.comment A. Sinclair) indicates the wallabies' prevalence and the ineffectiveness of current control measures. The increase of wallaby populations has particularly been noted since the disbanding of the Wallaby Pest Board. An increase in wild pig populations in recent years has also been a source of concern.</p>	<p>Oppose</p> <p>Amend wallaby provisions to strengthen implementation measures.</p>	Accept in part	<p>The provisions generally have been strengthened. We note that the Council will investigate looking at the establishment of a wallaby control unit as part of its wider biosecurity programme, but that further information is required to ensure that the benefits outweigh the costs.</p> <p>We have included this in our recommendations for Council which sit outside of the RPMP process.</p>

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42.4	Ashburton District Biodiversity Working Group - Bert Hofmans	See submission point 42.3	Amend wallaby provisions to include local stakeholders and landowners on any wallaby control entity.	Reject	There is not currently a wallaby control entity, but the council works to facilitate wallaby control among groups of land occupiers, and appreciates the value of local knowledge. Refer also to submission 42.3.
42.5	Ashburton District Biodiversity Working Group - Bert Hofmans	See submission point 42.3	Ensure that whenever possible prosecute those who spread either wallabies or wild pigs into areas where they are not currently present.	Reject	We note that approaches to prosecution sit outside the plan, and that wild/feral pigs are not proposed to be covered in the plan. Plan rule 6.4.3 applies, which creates an offence to keep, hold, enclose or otherwise harbour wallabies. In relation to feral pigs, these are managed under the Wild Animal Control Act.
46.1	Wainui Station and Viewfield - Walter Cameron	<p>Wallaby Infestation has become a huge problem in Sth Canterbury has a major impact on the production of our properties. In the 1980s early 90s- 1080 rabbit control was administered by Environment Canterbury in conjunction with property owners. This was very effective in eradication of juvenile wallabies. My understanding is that funding was a combination of general and target rates. The successful introduction of the rabbit virus meant that the use of 1080 has diminished. The wallaby population has exploded out to unprecedented levels causing them to infest country that never had a wallaby population. Our wallaby control program has been a combination of professional shooters, commercial helicopters and recreational shooters. Over the last 3 years we have averaged a kill of 3000 wallabies per annum. Last year under notice from ECan we undertook 1080 poison of 600 hectares with a 100% wallaby kill on that area of land. This year we have undertaken an additional 600 hectares 1080 poison.</p> <p>All of this comes at a huge financial cost.</p> <p>This is a South Canterbury wide problem with infestation spreading to areas of Otago.</p>	<p>Oppose</p> <p>Insert provisions to establish cluster groups amongst farmers to undertake co-ordinated kill / poisoning of wallabies, it is a futile exercise for one property to undertake a poison unless neighbouring/adjacent properties undertake the same.</p>	Accept in part	We strongly encourage regular, co-ordinated and controlled on a sub-catchment or area basis. We note that where parties seek a co-ordinated approach, to provide certainty they could potentially seek a notice of direction from the Council to ensure that action is undertaken. We do not recommend making any amendments to the plan in relation to this submission.
46.2	Wainui Station and	See submission point 46.1	Oppose	Reject	Refer to submission 46.1.

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	Viewfield - Walter Cameron		Amend provisions to ensure stronger regulations with defaulters		
49.4	Kurow Pest Liason Committee - Peter Reid	<p>The KPLC wishes to encourage continued dialogue with Ecan over the present wallaby situation anecdotal evidence suggest numbers have increased and spread quite alarmly over the last five years- we know that 'user pays' control hasn't worked particularly well up until now. There are some combined poison operations involving several landowners taking place this winter and hopefully the success of these will see others wanting to get involved next year. Early communication and cooperation between all parties is the key to success on this.</p> <p>In the 2011-2015 plan the formation of a dedicated wallaby committee was mooted, this has never been pursued, however the KPLC feels that unless it had very clear objectives and outcomes it would make little difference over and above the work of the present Pest Liason Committees.</p>	Request that Ecan carry out a full cost analysis on the set up and operation of a specialized wallaby control unit to be funded by a region wide targeted and general rate.	Reject	We note that if such a control unit were to be established, this would take place outside of the RPMP as part of the Council's wider biosecurity programme. The submitter is encouraged to continue engagement with the staff and Council.
59.3	Timaru District Council - Bede Carran	<p>In our earlier submission on the Regional Pest Management Strategy Discussion Document, we indicated a preference for a Progressive Containment Programme for Bennetts Wallaby. We note that the proposed plan recommends a Sustained Control Programme.</p> <p>This pest remains of particular concern in our district. While we acknowledge the need to prioritise pest management needs and limited available resources, we still support a more aggressive approach towards the management of these pests, represented by a progressive containment programme. As mentioned in our earlier submission, we would support the possibility of a targeted rate to improve wallaby management</p>	Amend the provisions for Bennetts Wallaby to apply a Progressive Containment programme	Accept in part	The primary programme for Bennett's wallaby is for sustained control within the containment area. However it is noted that the aim is also to preclude wallabies from establishing outside of the containment area – to that extent, there are two parts to plan objective 6.

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77.13	Land Information New Zealand (LINZ) - Maurice Dale	<p>LINZ supports in part objective 6 and related good neighbour rule 6.4.2 seeking the sustained control of Bennett's Wallaby to ensure population densities remain at or below Level 3 on the Guilford Scale within the Wallaby contaminant area. It also supports precluding the establishment of populations outside the containment area. Sustained control will ensure effects of Wallaby populations on biodiversity and production values are minimised.</p> <p>LINZ however considers that an exemption should be included in rule 6.4.2 from having to control Wallaby where an effective boundary fence is in place along the entire length of the common boundary which prevents Wallaby's crossing into the neighbouring property.</p> <p>LINZ also questions whether this rule meets the criteria of a good neighbour rule in that it does not specify a distance from the boundary within which control of wallaby densities are required. LINZ would support the inclusion of an appropriate boundary distance; such as is proposed in DOC's submission.</p> <p>LINZ also considers that a rule should be included in Plan requiring occupiers to report Wallaby sightings outside the containment area. The inclusion of such a rule important in ensuring the containment aims of objective 6 are met.</p>	<p>Support in part</p> <p>Retain objective 6</p>	Accept	Objective 6 is retained.
77.14	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.13	<p>Support in part</p> <p>Amend good neighbour rule 6.4.2 as follows:</p> <p>Note: This is designated a Good Neighbour Rule An occupier within the Wallaby Containment Area shown on Map 2 in Appendix 3 shall, on receipt of a written direction from an</p>	Reject	We did not receive any evidence on what a wallaby proof fence might be, and whether such a fence would be effective. We note that an exemption to the rule can be sought if such a structure was able to be provided.

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			<p>Authorised Person, control Bennett's wallaby densities on land they occupy to at or below Level 3 on the Guilford Scale where the occupier of adjacent land is taking reasonable steps to manage wallabies on their land.</p> <p>The provisions of this rule do not apply where there is a boundary fence along the entire length of the common boundary of the property which is effective in preventing wallaby crossing into the neighbouring property.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>		
77.15	Land Information New Zealand (LINZ) - Maurice Dale	See submission point 77.13	<p>Support in part</p> <p>Insert a rule under rule 6.4.2 requiring occupiers outside of the containment area to report any sightings of wallaby on their property to ECAN.</p>	Reject	We are satisfied with the Council's position that a regulatory approach to mandatory reporting is not effective. We accept that non-regulatory approaches, such as education and advocacy will assist with determining sightings.
78.14	Department of Conservation - David Newey	The Director General recognises the benefit of a wallaby containment area and the wider benefit of preventing wallaby in other parts of Canterbury. The Director General notes there is no longer a rule whereby land occupiers are required to report	<p>Support in part</p> <p>Insert a rule, or ensure there is an awareness plan that seeks land occupiers report the occurrence of wallaby</p>	Reject	Refer to submission 77.15

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		wallaby sightings outside the containment area. Such a rule is useful to achieve plan Objective 6.2	outside the containment area.		
78.15	Department of Conservation - David Newey	The Director General does not agree that this rule meets the criteria of the of a good neighbour rule. Where there is effective fencing and there is no pest spread across a boundary issue, a good neighbour rule would not apply in this instance. The Director General recognises the need to keep wallaby levels at or below 3 on the Guilford scale and intends to control wallaby on DOC land to meet this requirement so long as it has sufficient funds. The Department has budget constraints as well as other pest control priorities that may require reprioritisation of limited funding (examples are the recent Myrtle rust incursion and an expansion of Russel Lupin work to meet the newly proposed threatened species strategy). We welcome opportunities to join any interproperty co-ordinated control approaches.	Oppose  Amend rule 6.4.2 to what would be an acceptable good neighbour rule. We suggest a 1km boundary distance for Bennetts wallaby. This is consistent with the document provided as supporting the proposed plan and is titled "Meeting the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015: Analysis of Costs and Benefits. During consultation, we had with Regional Council staff a 500m and 1km distance were options considered. Recognise that if an effective fence prevents wallaby from crossing a landowner boundary there is no reason to invoke good neighbour rule control requirements.	Accept in part	We note that a 1 kilometre distance in relation to the good neighbour rule is appropriate, however we do not agree that reference should be made in the rules to wallaby proof fences. We note the ability to apply for exemptions should such a structure be available.
78.16	Department of Conservation - David Newey	The Director General supports this rule. Public Conservation Land is normally available to recreational hunting and the activity is encouraged to reduce wallaby numbers. A reasonable time needs to be specified so hunters and DOC staff can continue this activity with full knowledge of closure periods.	Support in part  Amend rule 6.4.4 to specify time periods in the rule or make the closure periods well communicated to affected parties via an	Reject	We accept the Council's position that where Crown land is involved in a shooting prohibition, staff will prepare a communications plan and work directly with the Department of Conservation.



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			effective communications plan.		
81.3	QEII National Trust - Alice Shanks	Current wallaby control has not confined wallabys' to the agreed Containment area. We wish to see ECAN general rates invested in research and development to provide new tool and strategies to control and contain wallabies. We wish to see a more strategic monitoring to provide accurate information on location and numbers. The monitoring and economic impact needs to include their effect on indigenous biodiversity and the opportunity cost of restoring the browsed forest trees. We wish to see non-regulatory incentives in place to help landowner act in unison, across tenure boundaries, lead by a multi-agency agency committee with strong landowner representation, including ORC staff.	Support in part  Amend the RPMP to formulate a 20 year plan to reduce Bennett's wallaby numbers back to the current Containment Zone so it can then be managed as a "Progressive Containment" pest species. Fund wallaby research and planning though general rates.	Accept	We note that the objectives are for the period of the plan, which aim to preclude wallabies from establishing outside of the containment area. We note that funding wallaby research and planning will take place outside of the RPMP and therefore do not require specific provisions.
82.3	Ministry for Primary Industries - Sherman Smith	Similarly a suppression rule for wallabies, i.e. keeping them to below Guilford level 3 which directly manages the impacts of the pest, may be considered unreasonable for a GNR, as this does not prevent them from spreading.	Amend rule for wallabies to be consistent with the NPD	Accept	Refer to submission 78.15.
85.1	New Zealand Defence Force - Stephen Phillipson	What constitutes "establishment" of a population should be clarified to identify when control needs to be initiated or intensified by ECan over control undertaken by landowners, to deal with vagrant animals or animal groups. This is also important for monitoring purposes as "preventing the establishment of wallabies beyond the Containment Area" is an important performance measure.	Support in part  Insert clarification or a definition of what constitutes "establishment" of wallabies beyond the Containment Area.	Accept	The following sentence has been included:  <u><i>Establishment means the confirmed presence in the wild, with a breeding population.</i></u>
85.2	New Zealand Defence Force - Stephen Phillipson	"Reasonable steps" needs to be defined or clarified as this is subjective and requires defined and measurable attributes so there is clarity around the obligations under the rule.	Support in part  Amend rule 6.4.2 to include clarification or definition of 'reasonable steps'.	Accept	We have directed that this be replaced with a measure of "where an adjacent property owner is maintaining wallaby populations at or below a Guildford level 3". This provides a certain measure as to whether someone is complying with a permitted rule or not, and does not reserve a discretion to interpretation as to whether someone is taking "reasonable steps".

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85.7	New Zealand Defence Force - Stephen Phillipson	<p>Given the recent uncontrollable expansion of the wallaby population and how important it is to maintain the current distribution of wallaby, leaving this monitoring measure to casual reports from "... occupiers or other persons ..." is an unreliable way to determine this. By the time most people notice a new established population it is likely to be well established, sizeable and probably more difficult and expensive to try and eliminate.</p> <p>The strategy and programmes for controlling wallaby outline under the existing RPMS appears to have been inadequate to achieve the objectives set for this pest in this document (Ensure Wallabies remain at or below level 3 in the containment and prevent the establishment of Wallabies outside of the Containment area). Aside from conforming to new programme titles required under the National Policy Direction, adding in a GNR and expanding the containment area, there appears to have been little change to the strategic approach or containment rules from the existing Canterbury Regional Pest Management Strategy. This indicates that the new programme is also unlikely to achieve its goals. Greater consideration should therefore be had in regard to the rules and actions governing this pest to achieve the objective.</p> <p>For those newly established populations, such as in the Mt Cook area, there should be strong rules in place to maximise control efforts and ensure they do not spread further. To stop the spread, it is important to know where the established pests are, which could be achieved through active monitoring of sites to provide an accurate measurement of the performance of the programme.</p>	<p>Oppose</p> <p>Amend provisions to ensure ECan staff or contractors do regular evaluations around the boundary of the containment area, particularly during periods when emigration from the established population is likely to occur. An example of this approach is the monitoring of Nassella tussock. In addition it would seem essential that notifying ECan on the sighting or presence of Wallaby outside of the containment area should become or remain a specific rule under the programme.</p>	Reject	Refer to submission 77.15
85.8	New Zealand Defence Force - Stephen Phillipson	See submission point 85.7	<p>Oppose</p> <p>Amend provisions to split the Containment Area into two</p>	Accept in part	We note that the explanation for the objective refers to management of a buffer inside and adjacent to the containment area boundary, and that ECan will undertake those actions necessary to maintain wallabies within the

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			programmes: sustained control within the containment area and a programme of Progressive Containment in the buffer zone. The function and management of the 'buffer zone', also needs to be addressed clearly with actions and rules placed around it to ensure that its objective can be achievable over the 10 year plan.		containment area, and preclude them establishing outside of this area.
85.9	New Zealand Defence Force - Stephen Phillipson	See submission 85.7	Oppose  Insert rules for those newly established populations, such as in the Mt Cook area, there should be strong rules in place to maximise control efforts and ensure they do not spread further.	Reject	We did not receive any evidence in relation to the establishment of wallaby populations in the Mt Cook area. We accept that the Council does not consider that rules would be of benefit in these situations. We understand the Council is undertaking an eradication and control programmes outside of the Containment Area, with the support of occupiers.
85.10	New Zealand Defence Force - Stephen Phillipson	See submission 85.7	Oppose  Amend the provisions to create a buffer zone, ensuring this has actions and rules placed around it to ensure that its objective can be achievable over the 10 year plan.	Reject	Refer to submission 85.8.
88.9	Forest and Bird - Jen Miller	F&B are extremely concerned by the documented increase in the wallaby range both within and beyond the containment area. Members familiar with the area, who include keen wallaby hunters,	Support in part  No specific decision requested relating to the	Accept	No changes required as a result of this submission.

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		<p>are also concerned at the high wallaby numbers within parts of their current range and the significant damage they are causing. F&amp;B supports the Bennett's wallaby Objective, Principle Measures and Rules as proposed but wish to put on record concerns about implementation.</p> <p>The natural boundaries of the containment area are as, or more, defensible than any beyond. If containment here fails in time wallaby range in the whole of the South Island will be determined by habitat suitability rather than control efforts. This plan and planning period are the last chance to protect the environmental values of very large areas of wallaby suitable habitat. It is also the last chance to prevent escalation of economic loss to farming and greatly increased costs of ongoing control should we fail in containment.</p> <p>Forest &amp; Bird are also concerned by increased wallaby numbers and damage in parts of the current wallaby range within the containment area.</p> <p>It is Forest &amp; Bird's view that there significant ground lost in terms of both range containment and control of numbers within their range since the disbanding of the Wallaby Control Board. The new legislative framework and/or the implementation of the current RPMS have failed. Within and constrained by this new legislative framework the wallaby provisions proposed for the RPMP seem fit for purpose and as stated we support them. Implementation is the challenge, in particular achieving the landowner and stakeholder co-operation required to achieve the essential co-ordination of control operations across land boundaries.</p>	RPMP. However, implementation is the challenge, in particular achieving the landowner and stakeholder co-operation required to achieve the essential co-ordination of control operations across land boundaries.		
88.10	Forest and Bird - Jen Miller	The purpose of this rule is unclear as it would appear Rule 6.4.1 applies to all landowners, as it should do in F&B's view.	<p>Oppose</p> <p>Amend the explanation for rule 6.4.2 to the</p>	Accept	The following sentence has been added to the explanation of 6.4.2 to provide greater clarity:

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			purpose of the rule as opposed to rule 6.4.1		<u>The rule is required in addition to Plan Rule 6.4.1 to manage the spread of Bennett's wallaby causing unreasonable costs to an adjacent occupier where active Bennett's wallaby management is being undertaken by that land occupier.</u>
93.2	Otago Regional Council - Warren Hanley	<p>ORC position is that the aim to hold populations within properties at current levels will not be sufficient in protecting Otago from the spread of wallabies and propose that listings are changed [to progressive containment and eradication].</p> <p>The current increase of wallaby in Otago is linked to natural migration from the ECan containment zone, natural migration from the breeding wallaby population outside of the containment zone and human assisted movement. It is ORC's view that all these things are attributed to the current levels in and outside of the containment zone. Rules and objectives for Bennett's Wallaby in the plan should be split into two separate categories; the issue of wallaby already established outside of the containment zone is a different issue from wallaby within the containment zone.</p>	No specific decision requested	Accept	No changes as a result of this submission point.
93.3	Otago Regional Council - Warren Hanley	<p>Wallaby Within the Containment Zone (6.3 – Progressive containment). ORC fears that the 6.4 sustained control approach will lead to a continued increase of populations. Listing wallaby inside the containment zone separately under 6.3 would have the following benefits</p> <ul style="list-style-type: none"> <li>Continually relieve pressure from the containment zone boundaries.</li> <li>Reduce costs to stake holders and the environment within the containment zone.</li> <li>Reduce public access to wallabies and human assisted movement.</li> <li>Support the wallabies unwanted organism status.</li> </ul> <p>This could best be achieved through coordinated wallaby control by an ECan approved body with significant funding from Department of conservation, Land Information New Zealand,</p>	Amend the RPMP to set a progressive containment objective for wallaby inside the containment area, to be achieved through coordinated wallaby control by an ECan approved body.	Reject	<p>We accept the Canterbury Regional Council's position that a sustained control is presently achievable, but that a progressive containment approach is not.</p> <p>We note that the Council acknowledges that greater work will need to occur to address pressure on the boundaries of the Containment Area, and it will be taking a strategic approach to control to ensure the success of the sustained control objective.</p> <p>Refer also to submission 42.3.</p>

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		Environment Canterbury, Land Owners and The Ministry of Primary Industries as is proposed for dealing with wilding conifers.			
93.4	Otago Regional Council - Warren Hanley	Wallaby established outside of the containment zone 6.2 Pests to be managed under an eradication programme. ORC support plan objective 6(ii) preclude the establishment of Bennetts wallaby populations in the Canterbury region outside of the wallaby containment area. However, this objective is not supported by a definition of the word "established" and does not mention the populations already in Canterbury outside of the containment zone.	Amend the RPMP to set an eradication objective for wallaby outside the containment area.	Reject	Refer to submission 59.3.
93.5	Otago Regional Council - Warren Hanley	ORC support plan objective 6(ii) preclude the establishment of Bennett's wallaby populations in the Canterbury region outside of the wallaby containment area. However, this objective is not supported by a definition of the word "established" and does not mention the populations already in Canterbury outside of the containment zone.	Amend the RPMP to include the definition of "established" and how it is to be measured.	Accept	Refer to submission 85.1.
93.6	Otago Regional Council - Warren Hanley	See submission point 93.5 for context	Amend the RPMP to include a map appendix of wallaby already known to be outside of the containment zone and list this separately under 6.2 in the plan.	Reject	We are satisfied that such a map is not necessary and can be achieved through non-regulatory means outside of the plan.
93.7	Otago Regional Council - Warren Hanley	ORC agrees with the rules set out in the draft plan however we submit that additional rules should be included.	Amend the RPMP to insert a rule requiring any person outside of the containment zone shown on map 2 appendix 3 to report wallabies seen, destroyed and any sign identified to ECan within two working days. Also, require ECan to keep a record of all reports of wallabies seen,	Reject	Refer to submission 77.15

# Proposed Regional Pest Management Plan

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			destroyed and signs identified outside of the containment zone and make this information available to other regions.		
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# Proposed Regional Pest Management Plan

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Funding					
Number	Name	Submission	Relief	Recommendation	Reasons
6.22	Ross, Fraser Bell	Funding: landowners should have a good level of responsibility for the controlling of weeds and pests on their properties and provide some funding, at least. However, where there are special biodiversity values present on private land then funding from other sources could be appropriate.	Ensure that other funding sources are considered for private land that has special biodiversity values.	Accept in part	Other funding sources may be available but they sit outside of the RPMP.
6.24	Ross, Fraser Bell	Monitoring: ECan must provide adequate funding and staff resources to ensure that the provisions of the Plan, when adopted, are indeed implemented. So, that biological values are indeed enhanced and protected for the longer term.	Ensure that there is adequate funding and staff resources to implement the provisions of the plan	Accept	This is one of the requirements of the BSA when formulating the plan.
12.2	McNeill, Steve	Oppose  The current delivery of pest management in Canterbury is currently failing on several fronts. a) Responsibility for pest control. (iii) central government should fund wilding pine control for those areas planted as experimental plantations by government departments in the past eg Castle Hill, Craigeburn area.	Amend RPMP to provide for central government funding of management of wilding pines from Government experimental plantations	Reject	Such funding arrangements cannot be directed by the RPMP.
12.4	McNeill, Steve	c) Compliance monitoring. (i) As with many Ecan activities compliance monitoring funding and staffing levels seem to be lower than required.	Oppose  Insert provisions to ensure adequate funding for monitoring and compliance provided	Reject	No such provisions are required. Refer also to submission 6.24.
16.1	Spencer, Fiona	I wish to oppose the proposal of changing the rating of Nassella Tussock from 50-50 to 75-25 to landowner. I do not believe that this is only a landowner problem - the district as a	Oppose  Amend the nassella tussock of 50-50 as the district as a whole needs to be vigilant on	Accept	We note that the funding for inspection, monitoring, advocacy and investigation for all pests has been amended to 50% targeted rate, 50% general rate, with 100% of control costs falling on the landowner for



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		whole needs to be vigilant on this weed to manage the decline of it.	this weed to manage the decline of it.		nassella tussock. We consider this mix to be appropriate and to address the submitters concern.
17.2	QEII National Trust - Rob Smith	See submission point 85.1	Amend the RPMP to raise the funds for the regional council to have authority to coordinate wallaby control by a targeted rate	Reject	Refer to submission point 17.1.
32.2	Hurunui Nassella Tussock Liaison Committee - Stewart Gibb	<p>This plan proposal of Nassella Tussock funding is a major change from that which has been in place since the first strategy under the Biosecurity Act. The current inspection funding is 50 : 50 occupiers and regional community. The proposal is 75 : 25.</p> <p>As noted, control work is 100% the responsibility of landowners. Most nassella is present on extensive hill country properties. Control is by landowners, staff and paid contractors. The only viable method of control remains walking the country and removing plants with hand tools. The area covered per hour depends on ground-cover and plant numbers, but 1-3 hectares per hour is normal. Hourly rates range between \$30-45. This is done every year. The cost to landowners over the Hurunui Nassella area is several million dollars per year.</p> <p>Nassella is a prolific seeder. Seed is wind-borne. Once aloft it can travel long distances. It can also be vectored on produce and vehicles. There are large benefits to landowners outside infested properties, and outside the known infested area from this control work. Nassella is capable of displacing our native tussocks and other native plants if left unchecked. Landowners in the proposed Hurunui Nassella rating area represent the" thin red</p>	Amend the funding formula for Nassella Inspection rate Occupiers 50%, Regional Community 50% - the status quo	Accept	Refer to submission point 16.1.

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		<p>line" preventing the widespread dispersal of this pest.</p> <p>We also note that under the Biodiversity rules Environment Canterbury and District Councils have recently restricted the ability of landowners to remove native species such as matagouri. This removes an important tool from landowners as it is impossible to find nassella which grows and seeds within matagouri bushes. The removal of matagouri and other scrub has been a major factor in getting good progressive control on much of our hill country. In imposing this we suggest that the wider region is exacerbating the problem.</p> <p>Part of the Hurunui Nassella Pest budget is for publicity, education and advice. This is of wider benefit to the community than to landowners dealing with nassella.</p> <p>Landowners accept responsibility for control. However there is a clear benefit to the wider region from this massive on-going control operation, and from the costs associated with inspection and enforcements of the rules within this plan. Please note that Hurunui landowners are also paying the general rate.</p>			
49.2	Kurow Pest Liason Committee - Peter Reid	<p>The KPLC does not accept the change in funding formulae for inspection as outlined in Table 36 for rabbits, wallabies, nassella tussock, Chilean needle grass, broom, gorse and some other pest plants where there has been a shifting of costs from the general rate to in some cases fully funded by the occupier in the way of targeted rates and is disappointed this was not discussed at earlier plan meetings. If the occupier has to pay the full and increased costs for rabbit and other plant and animal inspections this effectively becomes 'user pays' and they should then be able to say who comes onto</p>	Retain the funding formulae as set out in the RPMS	Accept in part	Refer to submission 16.1. Note that control costs are set out in amended Table 37.

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		<p>their properties in this regard either Ecan staff or private contractors – this will inevitably lead to conflicting inspection results and a loss of goodwill on the part of the landowner. It will also mean they effectively pay twice if control work is required.</p> <p>As earlier stated pest management is a collective responsibility and the KPLC SUBMITS that the status quo of funding for inspection and monitoring remains the same as in the present plan.</p> <p>It is noted in Table 39 regarding the annual cost of implementing the proposed plan, targeted and uniform rates will rise dramatically by around \$900,000.00 whilst the general rate increase is only \$100,00.00 . Land occupiers by far face a huge increase in targeted rates.</p> <p>We also note the discrepancy between figures on Table 37 for the economic analysis from the CBA report on wallaby funding regarding inspection costs and that put forward on Table 36. We are told this is an error but it is confusing to the reader and should have been fixed prior to the plans release.</p> <p>All plant and animal pest control has an economic benefit to the whole region through increased biodiversity values and on farm production, money spent on expensive poisoning operations for example is `dead ` money in that it could have been used elsewhere for farm development or flow out through the local community in other spending and another reason we feel the status quo for funding should remain.</p>			
49.3	Kurow Pest Liason	See submission point 49.2	Amend the discrepancy between figures on Table 37	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.

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	Committee - Peter Reid				
53.7	Rural Advocacy Network - Jamie McFadden	The funding formulae changes are inconsistent and illogical. Previously pests like rabbits, Chilean needle grass and gorse inspections were partly funded by the general ratepayer in light of the wider community benefits. However this latest plan has no general ratepayer input which raises questions about the robustness of the funding formulae rationale. We submit that all pests should have as a minimum at least 50% wider community funding for inspection costs.	Amend provisions to ensure that all pests have as a minimum at least 50% wider community funding for inspection costs.	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
53.11	Rural Advocacy Network - Jamie McFadden	Funding. (table 36: pages 88 – 90) Our submission is that greater recognition needs to be provided in the funding rationale for the wider benefits of pest control and historical context of pest spread. The incursion of pests into New Zealand should not be blamed on farmers but is a legacy of the development of our country. Landowners spend considerable amounts of money on controlling pests each year and this delivers significant conservation, recreational and visual landscape benefits. Many landowners have retained extensive areas of native bush and/or shrublands and there is increasing pressure from the wider community to prevent landowners from removing indigenous vegetation. Retaining indigenous vegetation on farms exacerbates pest issues and makes pest control much more difficult. We submit the funding formulae be revised to reflect the wider community benefits.	Amend provisions to ensure that funding decisions reflect the benefits to the wider community.	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
53.12	Rural Advocacy Network - Jamie McFadden	Refer to submission point 53.11 for context.  Gorse and broom: Table 35 on page 85 has understated the wider benefits of broom and gorse control.	Amend gorse and broom funding provisions for inspections to be 25% landowner 75% regional community.	Reject	Refer to submission 16.1. Note that control costs are set out in amended Table 37. We do not accept that exacerbators should receive significant subsidies and consider the 50:50 funding ratio to be appropriate.

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		<ul style="list-style-type: none"> <li>A number of rivers e.g. upper Hurunui and Clarence are becoming choked with weeds particularly gorse and broom. This is compromising recreational access for fishing, swimming and kayaking. The spread of gorse and broom also negatively impacts on activities like biking, tramping and compromises landscape values.</li> <li>Many broom and gorse issues have spread from public land particularly riverbeds and transport corridors.</li> <li>The biodiversity impacts are understated. Broom and gorse are taking over some of our hill and high country low shrublands, tussocklands and shrub subalpine vegetation.</li> <li>Broom and gorse act as nurse plants for wilding pines which out compete all native species. These weeds also provide habitat for other pests such as cats, ferrets, possums etc.</li> <li>The Port Hills fires demonstrated the problem with allowing the spread of gorse and the wider community benefits of gorse control. Our submission is for broom and gorse inspection to be 25% landowner 75% regional community.</li> </ul>			
53.13	Rural Advocacy Network - Jamie McFadden	<p>See submission point 53.11 for context</p> <p>Nassella: We oppose the change in inspection funding ratio from 50:50 to the proposed 25% general rate, 75% targeted rate. Left unchecked nassella can take over low growing native tussock shrubland such as <i>Celmisia</i> sp, <i>Linum monogynum</i>, <i>Poa colensoi</i>, <i>Pimelea prostata</i> etc. Nassella occurs on many lifestyle blocks and currently some of these properties have their</p>	<p>Oppose</p> <p>Amend nassella funding provisions for inspections remain 50/50 [general/targeted rate]</p>	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.

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		control work funded by rates. We submit nassella inspection remain 50/50.			
53.14	Rural Advocacy Network - Jamie McFadden	See submission point 53.11 for context  Chilean Needle Grass has similar biodiversity impacts as nassella and we submit the inspection funding rationale split should be the same as nassella.	Amend Chilean Needle Grass funding provisions for inspections to be the same as nassella [50/50 general/targeted rate]	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
53.15	Rural Advocacy Network - Jamie McFadden	See submission point 53.11 for context  Rabbits. Prior to RCD when rabbit numbers were high there was a significant impact on native vegetation. Rabbits eat regenerating seedlings and ringbark native trees and shrubs. While rabbit numbers have significantly decreased some urban and semi-rural areas remain a concern. One of the worst areas in the Cheviot area is around the Hurunui Huts village and riverbeds. Another concern is that an increase of rabbits leads to an increase in unwanted predators such as cats, ferrets and stoats which in turn predate on native wildlife. These issues need to be reflected in the funding split and our submission is that for rabbits the inspection funding split be 50% occupiers, 50% regional community.	Amend rabbit funding provisions for inspections funding split to be 50% occupiers, 50% regional community	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
56.1	Hurunui District Council - Stephanie Chin	HDC is concerned about the general direction of the strategy and the financial implications it would impose on land owners. HDC considers these changes would not apportion costs and benefits fairly.  HDC is opposed to the increased targeted pest management (occupier) rate, set out in Table 36, for Nassella tussock and Chilean needle grass. For Nassella tussock, which is prevalent within Hurunui District, the regional community rate for inspections is proposed to decrease from 50% to 25% and the occupier funding is proposed to increase	Oppose  Amend the RPMP to retain the current inspection funding split of 50/50 as per the existing Regional Pest Management Strategy.	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.

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		<p>from 50% to 75%. For Chilean needle grass the regional community rate for inspections is proposed to decrease from 50% to 0% and the occupier funding is proposed to increase from 50% to 100%. HDC has concern about the financial implications of this for land owners, given the prevalence of these two pests within Hurunui District. HDC is conscious that the costs of this pest control can be sizable for land owners, and that the result of this pest control has benefits for both land owners and the general public. As such, HDC does not consider it appropriate that occupiers bear increased inspection costs for pests that they are required to actively manage and control, given the contribution this makes to the general biodiversity values of an area.</p> <p>For both Nassella tussock and Chilean needle grass the inspection funding split under the current Pest Management Strategy is a 50/50 split. HDC favours the 50/50 split being maintained and oppose the proposed increases.</p>			
56.2	Hurunui District Council - Stephanie Chin	<p>HDC strongly supports the submissions prepared by Federated Farmers and the Rural Advocacy Network with regard to the matters raised in point 4 [submission point 56.1] above. The Federated Farmers submission contains a breakdown of the anticipated costs and revenues. HDC supports their positions in relation to the sections of their submission titled "Proposed increase to landowner contributions" and "Proposed inspection cost increases". In particular, HDC supports the following position: "Federated Farmers strongly opposes the considerable increase in landowner biosecurity contributions through the targeted pest rate. Federated Farmers asks that Environment Canterbury recognise the biodiversity contribution that landowners make through both providing habitat and</p>	<p>Amend the RPMP to recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides.</p>	Accept in part	<p>Refer to submission 16.1. Note that control costs are set out in amended Table 37.</p>

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		controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides."			
		With regard to the Rural Advocacy Network submission, HDC supports their position on Nassella tussock funding and Chilean needle grass funding.			
57.1	The Canterbury Chilean Needle Grass Pest Management - Charles Wiffen	<p>With regards to Chilean needle grass, we oppose the 100% occupier funded rate for inspection and control. The funding rationale in the Cost Benefit Analysis document (Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits Report prepared for Environment Canterbury as part of the preparation of a Regional Pest Management Plan) refers to the impacts of Chilean needle grass being agricultural, but makes no mention of the wider implications to Canterbury's economy and environment that the spread of Chilean needle grass could cause.</p> <p>Chilean needle grass has the potential to negatively affect environmental values by invading natural landscapes and reducing biodiversity, in a similar manner to parts of Australia where it has had a negative impact on rare native plant species (Faithfull, 2012).</p> <p>In addition to the loss of biodiversity values, spread to public land could result in a loss of recreational areas, as has been seen in Marlborough with recent infestations identified at the Wither Hills Farm Park and Omaka airfield. Such infested areas may need to be closed to the public during seeding season (Nov – April) and organised events could be adversely affected to avoid</p>	<p>Oppose</p> <p>Amend the funding formulae for Chilean needle grass, taking into account all potential impacts and not those solely related to agriculture. We would like the funding formulae to be split 50% occupier and 50% wider regional rate for inspections and control to reflect the potential impacts to the environment, tourism and recreation in the region.</p>	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.



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		<p>the risk associated with people and vehicles spreading the plant. This could result in a loss of tourism opportunities and associated revenue in North Canterbury, at a time when many businesses are already struggling with the after effects of the November 2016 earthquake.</p> <p>As the spread of Chilean needle grass has the potential to affect both rural and urban dwellers across the region, the burden of preventing this should not lie solely with rural land occupiers but should come from the wider regional community.</p>			
57.2	The Canterbury Chilean Needle Grass Pest Management - Charles Wiffen	<p>We would also like to note that the way in which the funding formulae is described in the proposed RPMP document is difficult to understand and requires greater clarification going forward. For example in the instance of Chilean needle grass, 100% 'occupier' funded inspections actually refers to a 'targeted rural rate on productive land', which is only detailed on page 103 of a separate document. For the general public this could be confusing and easily lead to misinterpretation.</p>	<p>Oppose</p> <p>Amend the display of the funding formulae to be less ambiguous and easier for the general public to interpret and understand.</p>	Accept	<p>The funding has been significantly simplified and clarified to provide readers with a clear understanding of where funding is obtained.</p>
60.2	Bleasdale, Chris	<p>I oppose the concept that the landowner should bear the entire responsibility for this objective</p> <p>Detail of Decision Required and concerns to be addressed: I request that consideration be given to a more equitable approach to this huge problem that exists not only due to the current owner's management of the land. Financial assistance with chemicals would be appropriate or access to ECan appointed gorse control contractors at discounted rates could be possible ways to help land owners.</p>	<p>Oppose</p> <p>Amend provisions to provide a more equitable approach to this huge problem that exists not only due to the current owner's management of the land. Financial assistance with chemicals would be appropriate or access to ECan appointed gorse control contractors at discounted rates could be possible ways to help land owners.</p>	Accept in part	<p>The amended provisions provide a more equitable approach across the region. Implementation methods regarding access to contractors and chemicals sits outside of the RPMP.</p>

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60.3	Bleasdale, Chris	<p>Part / Page No. : Page 85 (Broom &amp; Gorse)</p> <p>I oppose the wording under the headings “Beneficiaries” and “Exacerbators” Detail of Decision Required and concerns to be addressed: “Beneficiaries” should include the Tourism Industry and the wider Canterbury Community. “Exacerbators” should include birds, animals and the wind.</p>	<p>Oppose</p> <p>Amend provisions for Broom and Gorse “Beneficiaries” to include the Tourism Industry and the wider Canterbury Community, and “Exacerbators” to include birds, animals and the wind.</p>	Reject	<p>We accept the Council's position that the tourism industry is captured as part of the regional community beneficiary description. It is not possible to include non-human exacerbators (birds, animals and the wind).</p>
60.4	Bleasdale, Chris	<p>Part / Page No. : Page 89 “Funding Formulae” (Gorse) I oppose the proposed funding formula for this objective.</p> <p>Detail of Decision required and concerns to be addressed: I am of the opinion that it is grossly unfair to expect the land Occupier to be financially responsible for the entire REAL costs of this objective.</p> <p>The standard, frequency and quality of “Advocacy and Advice” and “Monitoring” by ECan in my experience has been abysmal in the past and therefore of no worthwhile contribution to the problem. Funds would be better allocated to assisting Occupiers with the cost of the practical measures needed to control gorse.</p> <p>It is noted in the Proposal that 100% of the cost of “Inspection” is allocated to the Occupier.</p> <p>However, it is not clear from the document what constitutes an inspection, by whom and at what frequency. Moreover, there is no mention of how this “Inspection” cost is recovered by the Occupier. I fundamentally oppose any proposal that the Occupier shall pay for an inspection.</p>	<p>Oppose</p> <p>Amend Gorse funding provisions to not require the land occupier to be financially responsible for the entire REAL costs of this objective.</p>	Accept	<p>The funding has been significantly simplified and clarified to provide readers with a clear understanding of where funding is obtained. Refer to submission 16.1. Note that control costs are set out in amended Table 37.</p>

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63.2	Stackhouse Farm Ltd - Adrienne Stackhouse	The 10-year plan proposed, will transfer more costs to landowners. See submission point 63.1 for further context	Amend the funding provisions for Nassella Tussock to provide an increase in financial input from ECan	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
69.3	The Mackenzie Basin Wilding Tree Trust - Andrew Simpson	<p>The Mackenzie Basin Wilding Tree Trust agrees with the following statements in the “Alternatives considered”: “Relying on occupiers to undertake voluntary control to prevent adverse impacts of pests in table 11 is not considered viable. .... The uneven spread of invasions places an inequitable burden on those occupiers whose property is infested.”</p> <p>The Mackenzie Basin Wilding Tree Trust submits that the funding model that is contained in the New Zealand Wilding Conifer Management Strategy 2015-2030, Appendix II on Page 29, be adopted as a rule in order to give certainty to all parties (occupiers, regional and central government) regarding their respective funding obligations under this plan. This would be Rule 6.3.3</p>	Insert new rule to outline respective funding obligations under the RPMP, this would be rule 6.3.3	Reject	The funding arrangements for the wilding conifer operations are coordinated outside of the RPMP process, especially because central government and local government (territorial authorities) are unable to be bound to funding agreements in the PRPMP.
72.5	Waimakariri District Council - Geoff Meadows	<p>Setting out the five pest management programmes on page 18 is clear and directs readers and users of the plan to how the desired control levels are to be achieved It is pleasing to see that the directions on Good Neighbour Rules contained in the National Policy Direction for Pest Management 2015, and setting out the requirements that must be met for the rule to bind the Crown, are included in the proposed Pest Management Plan.</p> <p>However with the increasing emphasis on individual land holder responsibility, an extension network of biosecurity staff that informs and advises landholders of best-practice pest management (or assists with incorporating biosecurity measures into farm</p>	Amend provisions in the RPMP to ensure there is an extension network of biosecurity staff to inform and advise landholders of best-practice pest management	Reject	This sits outside of the RPMP.

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		management plans) would be a welcome initiative. This is alluded to under Advocacy and Education on page 19.			
74.2	Federated Farmers - Lynda Murchison	<p>Federated Farmers strongly opposes the considerable increase in landowner contributions through the targeted pest rate. It is well recognised that many pest species have a biodiversity impact alongside their economic impact and much of the landowner funded pest control in the region also contributes to biodiversity. The focus of Government led pest control activity, as highlighted in the proposed RPMP, also shows a shift towards biodiversity protection. In many instances Canterbury farmers are expected to not only provide and protect indigenous biodiversity habitat on private land in the region, but to control the pest species that threaten this biodiversity and then fund the inspection work to ensure their own compliance.</p> <p>As highlighted in the tables below from the current RPMS and the RPMP, there is a proposed annual increase in pest management costs of over \$600,000 per year. Despite this, the General Rate contribution to pest control has decreased by over \$80,000 per year, and instead a significant increase in targeted pest rates of over \$850,000 per year is proposed. This increase is justified with less information than the previous RPMS and with very limited consultation with the affected landowners on the details of these changes. Farmers recognise the importance of both pest management and indigenous biodiversity and make considerable personal contributions towards pest control. If Environment Canterbury wants private landowner engagement on the public good that is biodiversity they need to support and work alongside landowners rather than</p>	<p>Oppose</p> <p>Amend the RPMP to recognise the biodiversity contribution that landowners make through both providing habitat and controlling pests on private land, and increase the General Rate share of pest control costs in recognition of the public good that the protection of biodiversity on private land provides.</p>	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37. The funding has been significantly simplified and clarified to provide readers with a clear understanding of where funding is obtained.

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		pushing more cost and compliance on farmers with little justification.			
74.3	Federated Farmers - Lynda Murchison	Federated Farmers strongly oppose the proposed increase in inspection/monitoring costs as outlined in Appendix 1. Inspection costs are for the benefit of the region as well as the individual, and Federated Farmers considers that these should be at least shared 50/50 General Rate and Landowner Contribution. Federated Farmers understands the importance of compliance inspections to ensure that the rules of the RPMP are followed, but it is difficult to understand the reasoning that landowners should have to pay for inspections to comply with Environment Canterbury rules when in almost all cases they have already borne the majority of costs for the pest control in the first place. When this sits alongside increasing environmental regulation costs through the Environment Canterbury Land and Water Plan, farmers are faced with a huge financial burden of environmental compliance costs when this money could be better spent delivering actual environmental work on the ground.	Oppose  Amend the provisions in the RPMP to set Inspection costs as a 50/50 General Rate and Occupier shared cost. This would serve to reduce the considerable landowner costs and increase the General Rate share for pest control activity that benefits both private landowners and the general public - as is recognised in other regions. For example, in the Marlborough region there is no charge for inspections for species such as rabbits and nasella tussock which are under very similar pest control programmes as those in Canterbury.	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
75.2	Te Runanga o Ngai Tahu - Ryan Hepburn	Te Runanga is supportive of the openness of the Council to working with other groups, including funding such groups, to achieve pest management goals. Additionally, we support the provision for site-led programmes wherein Ngai Tahu, or any other individual or group, may contact the Regional Council and receive assistance in establishing programmes to manage pests on sites that they consider significant. It is essential that funding is set aside in the next Long Term Plan to ensure these site-led programmes can be appropriately supported	Ensure that funding is set aside in the next Long Term Plan to ensure these site-led programmes can be appropriately supported	Accept	No changes required as a result of this submission.
78.38	Department of	Wilding conifers. This is a serious and expanding weed issue in Canterbury and	Support in part	Reject	Funding is initially provided for as part of the National Wilding Conifer Control Programme. Where control is

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	Conservation - David Newey	<p>even with the MPI national program funding a much larger control effort, more funding is required.</p> <p>Better identifying active exacerbators and seeking a contribution from them is fair will reduce the funding shortfall. It will also be an incentive to plant alternative species that do not cause spread in parts of the region vulnerable to wilding conifer invasion.</p> <p>Water is a significantly undervalued resource. Protection of Canterbury's water sensitive catchments from wilding conifer invasion maintains water yield and helps maintain water quality. Hydro benefits and benefits for irrigated land amount to 50% collectively. Seeking a contribution from water users is fair and their contribution would reduce the funding shortfall.</p> <p>Water abstractors are prepared to pay considerable amounts for new water abstraction projects which provides evidence that they would pay for protecting water that would be lost to them if wilding conifers established in their water catchments. These actions align with the wording in section 9.5</p>	Cost allocation for wilding conifers should include active exacerbators and seek a fair contribution from them. Water users are a main beneficiary and a fair funding contribution should be sought.		<p>required by the rules, that will be funded by land occupiers. A new entry is added after Table 37 as follows:</p> <p><u>Initial control of wilding conifers as part of the National Wilding Conifer Control Programme is funded outside of the Plan. Any regional contribution to maintenance control (as required by Plan Rule 6.3.1) will be determined through Long Term and Annual Plan processes, in conjunction with contributions from the Crown and landowners. The remainder of the wilding conifer Plan Rules which require action from land occupiers will be funded directly by those land occupiers.</u></p>
90.11	Johnstone, Robert	The funding formula [for gorse and broom] should be adjusted to provide more general rate contribution to inspections and farmer liaison	Amend the funding formula for gorse and broom to provide more general rate contribution to inspections and farmer liaison	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.
90.12	Johnstone, Robert	Nassella tussock - the funding formula should be left where it is and has been for a very long time. Those properties who have nassella have a huge annual cost whihc they have to meet year after year and must be a great imposition for them. The proposed alteration to the funding formula	Amend the funding formula for nassella tussock so the status quo remains	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.

# Proposed Regional Pest Management Plan

## Summary of Submissions and Panel Decisions

		as I understand it is not supportable the status quo should remain			
90.13	Johnstone, Robert	<p>Rabbits - the introduction of RHD has had a huge beneficial impact across all rabbit prone regions in Canterbury.</p> <p>My understanding is that the effectiveness of the virus is lessening but another one has been identified and may well be introduced. My plea is to do everything in your power to encourage this introduction to hopefully give an enhanced level of rabbit control once again.</p> <p>The funding formula should be adjusted to provide for Council funded control activities on these small blocks (4ha) of which there must by now be somewhere near 9000 or more throughout the region. These small property owners haven't really got shooting as an option and probably can't or won't get involved with poisons. But many have a significant rabbit problem.</p>	Amend RPMP provisions to include a targeted rate on small blocks for rabbit control	Reject	We accept the Council's position that the introduction of the new strain of the Calicivirus is out of scope for the RPMP, but staff are part of the National Group coordinating the introduction of this control. It is anticipated that the release of the new strain of the Calicivirus should reduce the levels of control required for rabbits, including on small blocks and council funded control should not be required.
90.14	Johnstone, Robert	<p>Old man's beard - No one questions the devastating impact this plant can have on both exotic and indigenous vegetation. But if the region is to have a policy it should be fair to all parties and implemented accordingly. the private land owners should not be hammered on the one hand while the Crown agencies in the riverbeds are allowed to escape enforcement and provide seed source for further contamination of private land . And what about OMB in residential city areas? Who monitors that?. And the local office ( Amberley) should not be able to arbitrarily draw a line down a road ,dissecting a property and then leave the adjacent (infected) riverbed out of contention.---plainly not fair. I submit that all OMB control should be funded by the Council General Rate. The Crown's good</p>	Amend the RPMP to set old man's beard control to be met 100% by the Council General Rate	Accept	This has been amended to 100% general rate, however we note the inclusion of a footnote to this rule that requires landowners to undertake control to be compliant with the rules, and that this control is funded by the land occupier.

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## Summary of Submissions and Panel Decisions

		neighbour approach is a start but not nearly enough.			
90.19	Johnstone, Robert	<p>Wallabies I support the continuation of the current policy of containment to those more southern geographical areas and to the level of numbers as has been established .. It would be a mistake to allow them to spread any further than their current range</p> <p>Funding Never forget that after the restructure of Local Government and the dissolution of the old Pest Boards all those Pest Board assets were sold . During the 1990's and early 2000's all the houses and depot assets in Canterbury were sold and that revenue went into the general Council pot (over \$3million) with none being specifically assigned to pest management per se . That in my view was wrong as those assets belonged to the rural ratepayers in the various Pest Districts . Therefore ,today, there should be recognition of that with greater funding coming from general rate.</p>	Amend the RPMP to assign greater funding to wallabies through the general rate	Accept	Refer to submission 16.1. Note that control costs are set out in amended Table 37.