



REGIONAL PEST PLANT MANAGEMENT STRATEGY FOR THE WEST COAST

Decisions Report

The West Coast Regional Council

October 2010

SUBMITTERS

Submitter Number	Organisation	Abbreviation	Wish to be heard
1	Department of Conservation	DOC	Yes
2	Federated Farmers Of New Zealand	FEDF	Yes
3	Frida Inta	INTA	Probably not be able to speak on behalf of submission
4	David Newton	NEWT	No
5	Tasman District Council	TDC	No
6	West Coast Tai Poutini Conservation Board	WCCB	Yes

READER'S GUIDE

1. Sections of this Report

This report summarises the individual decisions requested by submitters.

2. Decisions Requested

Each decision requested by a submitter has been assigned a decision number. There are two sections to the submissions made:

- General Submission
- Content Submission

The following shows the format of this Summary of Decisions Requested Report.

Section of Variation on which submission is made	→	General Submission
Decision number	→	Decision Requested: GS 1
Who made submission	→	Submitter 1 DOC
Submission/Change sought	→	Council should note that the Pest Management Proposed National Plan of Action 2010-2035 (<i>available of MAF website: http://www.biosecurity.govt.nz/biosec/consult/pmpn-plan-of-action2010-2035</i>) will require RPMS's...
Decision	→	Decision Noted. No change required. Reason No specific request is made by the submitter. The National Policy Direction is still in a consultation phase so it would be premature to make changes to the West Coast Strategy based on a national strategy that is not yet finalised.
Reason	→	

The decision each submitter to the RPPMS requested can be found by referring to the table *Index of Decisions Requested: Submissions*, which follows below.

INDEX OF DECISIONS REQUESTED: SUBMISSIONS

Submitter Number	Abbreviation	Decisions requested					
1	DOC	GS 1 3.4	1.3 3.5	1.4 3.16	3.1	3.2	3.3
2	FEDF	1.5	5.1				
3	INTA	1.7 5.3	1.8 5.4	3.11	3.12	3.15	5.2
4	NEWT	3.17	3.18				
5	TDC	1.2	3.8				
6	WCCB	GS 2 1.1 3.9 3.21 5.8	GS 3 1.6 3.10 4.3	GS 4 2.1 3.13 4.4	GS 5 2.2 3.14 5.5	GS 6 3.6 3.19 5.6	GS 7 3.7 3.20 5.7

SECTION 1: General Submissions

Decision Requested: GS 1

Submitter 1 DOC

Council should note that the Pest Management Proposed National Plan of Action 2010-2035 (available on MAF website: <http://www.biosecurity.govt.nz/biosec/consult/pmpn-plan-of-action2010-2035>) will require RPMS's to be aligned with the National Policy Direction before the Crown will be bound to them, and that Strategy rules are likely to be required to apply equally to all land of all tenures under this new direction. Therefore the Council are likely to have to review the RPPMS again when the National Policy Direction is released (scheduled for end of 2011), unless the Strategy is already aligned with this direction.

Decision

Noted. No change required

Reason

No specific request is made by the submitter. The National Policy Direction is still in a consultation phase so it would be premature to make changes to the West Coast Strategy based on a national strategy that is not yet finalised.

Decision Requested: GS 2

Submitter 6 WCCB

The West Coast Tai Poutini Conservation Board (WCCB) is grateful for the opportunity to submit on this important document. The Board considers that the first RPPMS has been relatively successful in its effectiveness over the last five years. The Board wishes to see further gains made in controlling pest plants over the next five years.

Decision

Support noted

Decision Requested: GS 3

Submitter 6 WCCB

The WCCB wishes to be heard at any hearing and is willing to be involved in further wording alterations which may result from the hearing. The Board believes that decisions on final wording should be made some time following the hearing; not on the same day. This would allow council the opportunity to carefully consider all suggestions and craft the wording accordingly. This is a five year plan, and worth getting as clear as possible.

Decision

Noted

Reason

Submissions are normally on content, not process. Council will decide on their process.

Decision Requested: GS 4

Submitter 6 WCCB

The Board would like to congratulate the council on some of the distribution of information over the last five years. The brochures of pest plants were particularly good and the expense of colour production is warranted to show what the plants look like. This educative effort needs to be continued and extended. Mapping of particular pest plants needs to be readily available.

Decision

Support noted

Reason

The submitters support is noted. Further mapping work of particular species is dependent on funding being made available.

Decision Requested: GS 5

Submitter 6 WCCB

The Board considers that in general there is too much emphasis on DOC as the lead agent in this strategy and that the lead role rests solely with the WCRC. DOC is a willing Crown agency but should never be seen as the lead agent in a regional pest plant strategy. Wording which reflects this is suggested more specifically later.

Decision

Noted

Reason

The submitter's views are considered later in the submissions once a specific request is made.

Decision Requested: GS 6

Submitter 5 WCCB

WCRC makes no funding provision for pest plant removal, but does include funding for education and promotion. The Board feels there should be provision in the council budget for control if the council is unable to retrieve costs from the land occupier.

Decision

Reject

Reason

There is no provision for the Strategy to seek funding. However, the Strategy does require land occupiers to undertake control work.

Decision Requested: GS 7

Submitter 6 WCCB

Table of Contents

A large number of pest plants are not listed in the contents. Either all plants should be listed, or

none. The Board would like to see all plants listed.

The order of plants is not consistent with the plants listed in Table 1.4. These should be consistent. The order of plants in the contents page and in Table 1.4 is not in a consistent and logical order. The order should be according to:

- a) Total control
- b) Progressive control
- c) Boundary control

Similarly, the contents page should have three sub-categories as above

3.1 Total control

3.2 Progressive control

3.3 Boundary control

With the lists of each category then itemised beneath each category.

Decision

Noted

Reason

The table of contents is simply an index to refer to where the information is in the document. The table of contents will be reviewed once all changes to the document are complete. The submitter appears to want the document re-structured, but does not give reasons why the suggested structure is preferred to the current structure. The structure and order of the tables and the document itself does not affect the achievement of the Strategy objectives nor how the rules impact on the land occupier. This submission is therefore on style rather than content and is discarded as immaterial.

1: Introduction

Decision Requested: 1.1

Submitter

6

WCCB

1.1 - The Board considers the wording should reflect more emphasis on the WCRC eg *The WCRC assumes responsibility for the overall strategy, including monitoring, education, co-ordination, review and enforcement.* This could be inserted after the first sentence.

Decision

Accept

Reason

The wording suggested by the submitter could assist the understanding of the strategy roles and responsibilities, and is an accurate reflection of the Council's role.

Revised Text

The Management Agency for this Strategy is the West Coast Regional Council (also referred to as the Council). *The Council assumes responsibility for the overall strategy, including monitoring, education, co-ordination, review and enforcement.* The Department of Conservation also assists...

Decision Requested: 1.2**Submitter**

5

TDC

Tasman District Council staff have found it helpful to use the Pest Infestation Curve to illustrate the time taken for infestation by pest plants to highlight the benefits of early intervention to control newly established pests to allow cost-effective eradication. It is also useful to indicate how management options are dependent on the level of infestation.

Relief sought:

To consider incorporating the Pest Infestation Curve with an explanation into the Strategy.

Decision

Reject

Reason

While it is accepted that the infestation curve can be a useful tool, the strategy does not need to include it other than as an illustration of the establishment level of the new pests. All total control pests in the Strategy are 1-2 on the infestation curve (out of 10) which is why they have been proposed for inclusion in the strategy. The curve would not really assist the reader as all total control pests are at the same low level on the curve, and the curve illustration would therefore be repetitive.

Decision Requested: 1.3**Submitter**

1

DOC

Smilax is spelt incorrectly (Similax) throughout the document.

Decision

Accept

Reason

The plant name was mis-spelt and has now been corrected.

Decision Requested: 1.4**Submitter**

1

DOC

The status of parrot's feather is unclear. Table 1 (page 2) says it is a progressive control plant, but Map 4 (page 17) says "occupiers must destroy any parrots feather on their land", suggesting total control status. This needs to be clarified.

Decision

Accept

Reason

Table 1 contains a few errors which need corrections, including the new status of parrot's feather as a total control pest plant, and the mis-spelling of Smilax.

Decision Requested: 1.5

Submitter 2 FEDF

Federated Farmers is generally satisfied with the proposed amendments to the Proposed Plant Pest Management Strategy for the West Coast. It is appropriate to include into the strategy the following plant pests: white edged nightshade, cathedral bells, cape ivy, bushy asparagus, woolly nightshade, tree privet, similax, Japanese honeysuckle, banana passionfruit and chocolate vine.

Ragwort is a pest plant of particular concern to the West Coast province of Federated Farmers, because of its ability to be easily spread and its ongoing inclusion in the strategy is appropriate.

Decision

Support noted. No change required.

Decision Requested: 1.6

Submitter 6 WCCB

The Board strongly supports the added plants in Table 1.

Decision

Support noted

Decision Requested: 1.7

Submitter 3 INTA

Asiatic knotweed in the Seddonville area should be acknowledged. Rumour has it that this weed was introduced to the Coast through a haybale imported to Seddonville. The knotweed is a big problem in Seddonville, and not enough care is being done in the area to prevent its spread. For example, although it is probably too late now, roadside cutting machinery should be washed after being in the Seddonville area to prevent the spread of the weed. Landowners with the problem weed should be responsible for destroying it.

Decision

Reject

Reason

Asiatic knotweed is a concern in several parts of the region. Like many weeds, it appears to be too widespread to meet the Section 72 tests in terms of eradication as the costs would be too high and the benefits of eradication are not expected to justify the costs. Asiatic knotweed is already acknowledged in Section 7.7 of the Strategy as a surveillance plant and is covered in Appendix 2.

Decision Requested: 1.8

Submitter 3 INTA

Spanish heath is a big problem in the Seddonville area also. This area should be included in chart 1.4. Included in the chart should be cotoneaster (I don't know the scientific name). I am surprised that common bamboo is not included in chart 1.4. Barberry is a problem in the Seddonville area.

Decision

Reject

Reason

The Section 72 tests in the Biosecurity Act are not felt to be satisfied for bamboo, cotoneaster, barberry or Spanish heath in the West Coast region. Like gorse and broom they may be too widespread to eradicate and the cost of requiring landowners to control these weeds is difficult to justify given the seriousness of the potential adverse effect of these plants is far from clear in the West Coast situation. The submitter has not explained how the plants are causing problems in Seddonville and needs to demonstrate the actual threat of these plants. At present the DoC experts are not prioritising these plants as highly as those that were included in the Strategy.

2: Strategy Responsibilities

Decision Requested: 2.1

Submitter

6

WCCB

The Board generally supports the text here (2.3) but queries why the local territorial authorities are not mentioned here. The Board considers that these roading authorities should be as responsible for their road verge control as NZTA, and that wording should reflect that. This is particularly true where the roading network contributes to the 'enjoyment of the recreational value of the natural environment' Section 72(1)(c)(iv) Biosecurity Act. A map of the area which NZTA takes responsibility for would be useful. By implication, the local councils would generally be responsible for other formed roads.

Decision

Reject

Reason

The submitter is correct that formed roads that are not state highway are the responsibility of local councils and that road verges may need to be cleared of pest plants under the strategy rules. Section 2.3 already identifies roading authorities - which are the local councils.

Decision Requested: 2.2

Submitter

6

WCCB

The Board queries the functionality of the 'adjoining neighbour complaint' in this clause (2.3). A land occupier might well be concerned about the spread of, for example giant buttercup along the road verge, but it is unclear whether he is entitled to complain until it is directly opposite his land. The Board wishes this clause to be removed, and will discuss this issue at the hearing.

Decision

Reject

Reason

The existing structure of this rule is considered to have worked well to date and the Council is not inclined to allow any person to complain about a boundary control pest plant unless there is a real risk that the plant's presence is actually going to affect that person directly. Such a change could result in a rash of complaints and enquiries by members of the public who are not directly affected by pest plant spread, but may wish to 'get at' a neighbour, for example.

3: Pest Management Programmes

Decision Requested: 3.1

Submitter 1 DOC

Total Control Rules are appropriate and the inclusions are supported.

Decision

Support noted.

Decision Requested: 3.2

Submitter 1 DOC

All Progressive Control Rules should apply equally to all land regardless of tenure. If the rules are to be of benefit to the region then they should not only require the Crown to comply. Simply "encouraging" occupiers of non-Crown land to comply is inadequate and will greatly reduce the effectiveness of Progressive Control Rules.

Decision

Reject

Reason

Applying the Progressive Control Rules to all landowners would be unfair, as Crown land is at this stage not bound by these rules. Once Crown land is bound, Council can reconsider the application of the Progressive Control Rules to all landowners, equally.

Decision Requested: 3.3

Submitter 1 DOC

All Progressive Control Rules should read, *"Occupiers of any land within the control areas shaded on Map X are required to EITHER a): destroy any listed Progressive Control species on their land at their own expense OR b): allow any pest plant control officer of a Crown or Council agency access to their land in order to destroy any listed Progressive Control species at the expense of the agency."*

This would be appropriate as it gives landowners an element of choice. They can either control the species themselves or have a pest plant officer come and do it for them. The Crown or Council agency should not be limited to "Department of Conservation staff" as in the current proposed Strategy.

Decision

Reject

Reason

The current rules mention this 'second option' (allowing access to DoC staff) as a note beneath the rule. Neither Council staff, nor other Crown Agency staff, are currently engaged in weed control activities in these Progressive Control Areas. It is not clear therefore why the rule needs to be broadened to include Council or other Crown agencies as no other agency is currently involved, nor intending to become involved.

Decision Requested: 3.4

Submitter 1 DOC

Section 3.2 third bullet point, Progressive Control. Delete the words "of Crown land".

Decision

Accept

Reason

The submitter is correct in that some progressive control areas, for two pest plants, private land owners are now bound by the rules. For accuracy these three words will be deleted.

Revised text

- Progressive Control – these rules require occupiers of Crown land to destroy pest plants in certain locations.

Decision Requested: 3.5

Submitter 1 DOC

Provision should be made that an occupier may not use this rule to force an agency to control a species on private land where control of the species is deemed to be in the interests of the occupier. In such a case the species should be controlled at the expense of the occupier, or if by an agency only at the discretion of that agency. In particular gorse and broom on private land in a Progressive Control Area are examples of where this issue may arise.

Decision

Accept in Part

Reason

The Progressive Control Rules cannot be used by a land occupier to force the Department of Conservation to do work on their own land or anybody else's land. The rule only applies to occupiers of Crown land. The bullet point below the rule is a note to the rule and as such has no legal status. In any case, the Department is not bound to the Strategy under the Biosecurity Act. For Rules 3.17.3, 3.17.5, and 3.17.7 the bullet point notes have been amended for clarity, in response to another submission (3.19). This may also assist with this submitter's concerns.

Revised text

3.17.3

- ~~Note that, for Gunnera and Wild ginger, land occupiers have the choice of either paying for their own weed control or asking Conservation staff to do the control for them, at no cost to the landowner.~~
- The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.

3.17.5

- ~~Note that, for Gunnera and Wild ginger, land occupiers have the choice of either paying for their own weed control or asking Conservation staff to do the control work for them, at no cost to the landowner.~~

- The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.

3.17.7

- ~~Note that land occupiers have the choice of either paying for their own Gunnera control or asking Conservation staff to do the control for them, at no cost to the landowner.~~
- The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.

Decision Requested: 3.6

Submitter

6

WCCB

The Board considers that these rules are not ordered logically and should be rearranged as described earlier. The Board would like to see more context about each category at this point in the strategy. For instance, progressive control is further described in 3.17, but the Board considers some of that text would be more appropriate earlier in the document. Suggested information on each category at this point would include the rationale and long term goal for each category, and perhaps a list of plants in each category. Table 1.4 should align completely with this outline on the three control types.

Decision

Accept in Part

Reason

There is no reason why the document should be re-structured, and a re-structure will not affect the achievement of the strategy objectives.

However, there are some changes that could be made to the order of Table 1.4 to be consistent with the order of pest plants in the document.

Table 1.4 order has been reviewed as far as is practical.

Decision Requested: 3.7

Submitter

6

WCCB

The Board supports the Strategy of 'Progressive Control' but makes two recommendations:

1. That an intention is stated towards Total Control in these areas over time, and
2. That the progressive control rule should apply equally to all land occupiers. The Board sees no logical reason why a pest plant is regarded as a pest on one portion of land and not on an adjoining parcel.

Decision

Reject

Reason

The submitter makes no case as to why total control should be the goal for these plants in these areas. However, clearly the rules would logically lead to eradication over time within these areas if the Crown land and private land are progressively cleared of these plants. This depends to some extent on how well the Crown funds their weed control programme in terms of these progressive control areas.

The Strategy explains the logic behind the Crown taking the lead in these progressive control areas under section 3.17. The Department of Conservation is the dominant landowner in the region and is an advocate for the control of these plants. Many, if not most, of these progressive control pest plants occur on Crown land, and the benefits of such control accrue nationally.

Applying the Progressive Control Rules to all landowners would be unfair, as Crown land is at this stage not bound by these rules. Once Crown land is bound, Council can reconsider the application of the Progressive Control Rules to all landowners, equally.

Decision Requested: 3.8

Submitter 5 TDC

The Tasman-Nelson Regional Pest Management Strategy 2007-2012 includes a provision for the control of Old Man's Beard in the Upper Buller Catchment, where it is classified as a Progressive Control pest and landowners are required to destroy all forms of Old Man's Beard on land that they occupy. This work is largely undertaken by the Department of Conservation with funding from LINZ on Crown land adjoining the Buller and its major tributaries.

Relief Sought:

To incorporate Old Man's Beard in part or all of the Lower Buller catchment adjoining the Tasman District as a Progressive Control pest.

Decision

Reject

Reason

DoC West Coast have advised that they do control old man's beard in the upper Buller River catchment and other areas in the region and it is a high priority weed for Department control. The plant is nearing eradication in some locations and there does not appear to be any need for the Strategy to include rules at this late stage of the control programme as DoC have this weed well in hand. Including the plant in the Strategy will have no material effect on Old Man's Beard control programmes so no change is necessary.

Decision Requested: 3.9

Submitter 6 WCCB

Broom is a potentially huge problem for parts of the region currently unaffected. The strategy should strengthen or add any method which prevents incursion, and preferably decreases its current range. The Board contends that parts of the region should be Progressive Control for broom.

A map of Broom Presence (or Broom Absence) would be extremely useful for monitoring progress in controlling its spread. For instance the eradication of broom north of an including the Karamea Bluffs is achievable, but categorising it as Boundary Control is not strong enough.

Decision

Reject

Reason

The submitter has presented their opinion but no supporting information. There are already Boundary Control Rules for broom. The Council's advice from Landcare Research does not advocate broom control as this plant is well established and the costs of control would not be justifiable. The

Section 72 tests in the Biosecurity Act are not met for this plant region-wide.

Decision Requested: 3.10

Submitter 6 WCCB

3.4 - 3.16: A similar approach for each of these plants would be desirable. It is highly desirable to know the present limits of these plants. It is also desirable for local communities to know these limits and to be involved in monitoring any incursions. Local maps should be readily available to communities identifying all pest plants. These could be readily available on the council website.

Decision

Reject

Reason

With respect to the submitter, there has not been a high level of public interest in the Strategy review, and it would seem unlikely in Councils opinion that local communities would want to be involved in 'monitoring incursions'. The submitter appears to have an interest that perhaps exceeds that of other local West Coasters. The Council may wish to fund the preparation of maps showing weed distributions, but it may be more efficient for the Department to do so as they hold more information.

There is no evidence to suggest that maps on the website will enhance the speed of achievement of Strategy objectives, and there has been no demand for such maps until this submission was received. The Strategy has delivered reasonably well so far with no maps or 'community monitoring of incursions'. There is no reason to doubt that further progress on the achievement of objectives will occur under the 2nd generation strategy, at the same speed as it did under the first.

Decision Requested: 3.11

Submitter 3 INTA

3.12: Cape Ivy. The description of the leaves needs to be elaborated. It is hard to see the leaf form from the photo.

Decision

Accept

Reason

Staff will look for a more detailed description and photographs.

Decision Requested: 3.12

Submitter 3 INTA

3.16: Tree privet (*Ligustrum lucidum*) is not eradicated from the Coast. There are several incidences of it in the Seddonville area therefore it should not be considered as eradicated.

Decision

Reject

Reason

The Department of Conservation expert has suggested the submitter is confusing her privet species and that the submitter is mistaking the more common (on the Coast) and less invasive chinese privet (*Ligustrum sinense*) or privet (*Ligustrum ovalifolium*) for tree privet. These other species are also small trees or shrubs, but have smaller leaves and flowers than *Ligustrum lucidum* and are often found in old gardens and near old settlements where they were often used as hedges.

The only known infestation of *L. lucidum* was at Waimangaroa and was eradicated about 10 years ago. The submitter is invited to communicate to Tom Belton at DoC Hokitika the more precise locations of the privet she has seen so that he can verify whether they are in fact tree privet, or not.

Decision Requested: 3.13

Submitter

6

WCCB

3.17: This section on Progressive Control Areas has begun to work well in the past strategy. The Board strongly supports this section in general.

However as described earlier, the Board considers that more information on Progressive Control should be earlier in the document at 3.2. The Board also considers that the emphasis in this section is too heavily biased towards DOC, when in fact this is a region-wide issue for which WCRC is the lead agent and has statutory responsibility.

Benefits accrue to all West Coast ratepayers especially tourist operators and land-owners. The Board considers that WCRC should be at least an equal partner in the pest control effort. Wording should reflect this. WCRC should offer alternative control operators such as 'approved contractors' to undertake control work.

A statement to the effect that DOC offers a free service in some instances is still useful but should be offered as an alternative.

The Board wishes to be involved in assisting with wording on this section.

Decision

Noted - no change required.

Reason

The Crown has a direct interest in pest plant control as the plants are primarily a threat to the conservation values of their estate. The Council has a statutory role under the Biosecurity Act, and is fulfilling that role by administering this Strategy. There is no statutory role that specifies that ratepayers should provide weed control services. Council has not to date offered any weed control services free of charge and funded by general ratepayers. Ratepayers do fund the Strategy review process which is not an insignificant cost.

Decision Requested: 3.14

Submitter

6

WCCB

The Board supports the stated Means of Achievement (Method?) of monitoring the effectiveness of control work that has been undertaken, but the document does not say how, who or when that will happen. Mapping and regular release of monitoring information will achieve this aim. This should be stated somewhere in the strategy, possibly in 7.3.

Decision

Noted – no change required.

Reason

Further text is not considered to be necessary. The monitoring is undertaken every time a complaint is made that relates to Strategy rules. All complaints from the last five years were analysed prior to the review of the document and that analysis proved useful to assess the level of 'problem' for each pest plant. The Department have also provided very useful information as they are the main holders of plant distribution information. Further mapping of weed species may assist but this is costly and we understand the department prioritises actual control work above mapping (which is supported).

Decision Requested: 3.15

Submitter 3 INTA

Origins of problem plants (original habitat) would be an informative inclusion.

Decision

Noted

Reason

The informative role of the Strategy is accepted but only needs to be taken as far as plant identification. This information would not assist in achieving the objectives of the Strategy.

Decision Requested: 3.16

Submitter 1 DOC

For the Haast Progressive Control Area the downstream boundary could be moved upstream from the current mapped area to Greenstone boundary so as to avoid placing an unnecessary burden on private landowners around snapshot creek where gorse is common. This will not unduly effect the progressive control programme as the intention is to keep the main Haast Valley free of gorse and broom.

Decision

Accept

Reason

The submitter is correct in regards to altering the mapped area. The progressive control area at Haast will be re-mapped to exclude the lower area.

Decision Requested: 3.17

Submitter 4 NEWT

I wish to have amendments made to the area of progressive control for Old Man's Beard and Banana Passionfruit. Both these weeds will have huge impact on landscape values, biodiversity value in particular important tourist corridors, Buller Gorge and Coastal Highway.

There has been a lot of money and resources over the years from both Tasman District Council and Department of Conservation working to keep Old Man's Beard, particular out of the Buller catchment and from gaining a hold on the West Coast.

Extend Progressive Control area from Tasman boundary and all between Karamea to Rapahoe.

Decision

Reject

Reason

DoC have indicated that they are controlling old man's beard, annually by helicopter, and they have indicated infestations are now well in hand in the region. Banana passionfruit is of a similar nature (a climber) that affects bush margins, and primarily presents a risk to conservation areas. DoC are controlling this in priority areas also. Therefore no amendments are considered necessary.

Decision Requested: 3.18

Submitter

4

NEWT

Have amendments made to increase area of progressive control from Karamea to Rapahoe or even coastwide for *Cortaderia jubata*. This is a major weed in parts of the North Island. This weed spreads readily by wind, can grow in sites from sand dunes to waste land such as quarries, mine waste areas.

Good work on pampas is already happening with Holcim and Department of Conservation taken a leading role in control around the Cape Foulwind area. This is a weed that's not too widespread to achieve control

I seek that the Progressive Control area for Pampas, *Cortaderia jubata* be enlarged to take in the whole West Coast.

Decision

Reject

Reason

The control of pampas region wide is not seen as having a positive cost-benefit, as required by S72 Biosecurity Act. Pampas is in many parts of the region and is not low on the infestation curve. It is used as an amenity planting in some areas and is not considered to be a weed that is high risk in terms of its adverse effect in undesirable areas.

Decision Requested: 3.19

Submitter

6

WCCB

Progressive Control Rules (3.17.1 to 3.17.9 and Maps 1 to 5)

The Board strongly supports these rules and the production of these maps. The Board makes the following general comments on these sections:

The Board recommends that no distinction be made between 'occupiers of crown land' and 'occupiers of non-crown land'. These references should be amalgamated such that all rules reflect those as suggested to the Crown land status.

That all references to Conservation staff should be worded differently. This could be as follows: *The WCRC can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.*

The Board supports all inclusions on the progressive control areas.

Decision

Accept in part

Reason

Applying the Progressive Control Rules to all landowners would be unfair, as Crown land is at this stage not bound by these rules. Once Crown land is bound, Council can reconsider the application of the Progressive Control Rules to all landowners, equally. However, for the purpose of clarity, bullet points in the Progressive Control Rules 3.17.3, 3.17.5, and 3.17.7 are to be amended as recommended by the submitter.

Revised text

3.17.3

- ~~Note that, for Gunnera and Wild ginger, land occupiers have the choice of either paying for their own weed control or asking Conservation staff to do the control for them, at no cost to the landowner.~~
- *The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.*

3.17.5

- ~~Note that, for Gunnera and Wild ginger, land occupiers have the choice of either paying for their own weed control or asking Conservation staff to do the control work for them, at no cost to the landowner.~~
- *The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.*

3.17.7

- ~~Note that land occupiers have the choice of either paying for their own Gunnera control or asking Conservation staff to do the control for them, at no cost to the landowner.~~
- *The Council can provide a list of approved pest plant contractors available to undertake control work at the land occupier's expense. Alternatively, the Department of Conservation may be able to provide a free service in certain circumstances.*

Decision Requested: 3.20**Submitter**

6

WCCB

Karamea – Little Wanganui PCA (13.17.4)

This is supported but the Board considers that broom and pampas should be included in the list. These plants are relatively rare and should be controllable. DOC currently engages in eradication of these plants.

Decision

Reject

Reason

The submitter has not provided any information showing the prevalence of the two plants mentioned in the Karamea area. In the absence of such information it is difficult for the council to properly apply Section 72 of the Biosecurity Act. The plants cannot be included in the Strategy unless the Section 72

tests have been applied.

Decision Requested: 3.21

Submitter 6 WCCB

Map 4

The Board recommends that the southern boundary of the Karamea area should extend to the southern side of the Karamea Bluff. If this is not accepted, then the Bluff summit should be the limit. Pest plants arriving in Karamea generally invade via the road corridor and this scenic drive should not be compromised.

Decision

Reject

Reason

The submitter has not provided any technical evidence supporting a new boundary.

4: Funding of the Strategy

Decision Requested: 4.1

Submitter 6 WCCB

The Board considers that a generic category of 'Ratepayers–Occupiers', or 'Non-Crown land occupiers' should be mentioned at the start of 5.1. This firmly states that the ratepayers, through their rates, are contributors and both beneficiaries and exacerbators. All other headings refer to Crown agencies.

Decision

Accept

Reason

Council accepts the addition of the heading of 'Ratepayers-Occupiers' above the second paragraph in Section 5.1 as this part of the Strategy does refer to funding by ratepayers for services provided by the Strategy.

Decision Requested: 4.2

Submitter 6 WCCB

Local authorities are not listed as a source for funding. Surely as administrators of road reserves there should be an acknowledgement of their input along the lines of that attributed to NZTA? The Board requests some wording to reflect the responsibility of local authorities.

Decision

Noted

Reason

Local authorities are responsible for any pest plants that occur on lands they occupy exactly the same as all other land occupiers.

5: Other Methods

Decision Requested: 5.1

Submitter

2

FEDF

Federated Farmers is concerned that there may be a lack of understanding by landowners of which plants are included in the strategy, how to recognise them and appropriately remove and dispose of them. We seek that Council consider greater education programs for landowners in rural parts of the West Coast on which plants are considered pests, how to recognise them and how to appropriately remove and dispose of them to avoid ongoing spread.

Federated Farmers considers that one cost effective method of providing education is to include information and perhaps photos of pest plants with the rates newsletter which is already published and posted to all ratepayers.

Decision

Noted

Reason

The current newsletter has such an article with colour photos and further articles can be arranged.

Decision Requested: 5.2

Submitter

3

INTA

Section 7 mentions public education but I have seen no evidence of this since the strategy was implemented. Therefore I advocate including the following as part of the strategy.

Good practice in the use of weedsprays:

- Use of high-odour sprays e.g. Tordon is low-odour and should be discouraged as adverse effects of the herbicide (e.g. spraydrift on humans) are not noticed until symptoms appear, and by then it is too late to take evasive action.
- The use of sprays where the side effects are at least known in comparison to those whose side effects are unknown and unacknowledged.
- The use of dyes in weedspray, in order to reduce the amount of spray used, and to create awareness that weedspray has recently been used (mainly on roadsides and near-roadside areas). People with adverse reactions to weedsprays would then be able to take evasive action before advanced adverse reactions occur.

Other methods (applies more to residential areas):

- Finely shredding bulbs, rhizomes, tubers and corms of plants that are not likely to regenerate from this shredding;
- Burying all weed parts more than a metre deep;
- Disposing of pest plants that regrow from small fragments e.g. tradescantia, selaginella, morning glory, by drying out in the sun and then composting; or rotting down anaerobically in plastic bags; or covering well with plastic to rot; or producing liquid fertilizers from these weeds by immersing in water in a covered water container.

Practices to avoid:

- Tipping the contents of aquariums, goldfish bowls etc into waterways;
- Disposing of any pest plants onto wasteland, roadside verges, esplanades waterways and banks, and other places where they may gain hold.

This last practice should have fines attached to it as it may be one of the prime aggravators of introducing pest plants to the wider environment. In the Buller it is a common practice to dump

unwanted plants from residential gardens along river banks and along estuarine areas. This outrageous practice needs to be highlighted to arrest it.

Mention should be made somewhere in the strategy of the dangers of:

- Plants that can propagate by tiny fragments, e.g. *tradescantia*;
- Plants that smother and exclude some species of native seedlings from sunlight, and thus alter native ecosystem balance e.g. *tradescantia*, honeysuckle.

Decision

Accept in part

Reason

There has been substantial public information on weeds provided by the Council over the past five years. The intent is to continue with the dissemination of public information. The Council website has a wealth of information on pest plants. The Council has also participated in the weedbusters group which has produced educative information that is distributed by the Council's information officer. The Council will consider further education to be included on the website on the points raised by the submitter.

Decision Requested: 5.3

Submitter

3

INTA

Roading authorities and contractors should be encouraged to leave indigenous vegetation in place along roadsides where it is not causing a roading hazard. Removal of indigenous vegetation encourages the establishment and spread of weeds, and this needs to be included in the strategy.

Decision

Reject

Reason

This is not a matter for this Strategy. It is a matter for road controlling authorities.

Decision Requested: 5.4

Submitter

3

INTA

Since the Pest Plant Strategy was introduced weeds have spread and established on the West Coast, especially along roadsides, which is a good vector to land beyond. There should be emphasis put on the cleaning of machinery between jobs and/or areas, to prevent weeds from being transferred from one area to another that has none of the weed. Contractors need to be aware of their role in the spread of weeds in the District.

Decision

Accept in part

Reason

There is mention of cleaning of machinery in the Strategy. See clause 7.5.

Decision Requested: 5.5**Submitter**

6

WCCB

The Board supports this section. It particularly emphasises the importance of the second paragraph's procedures and stresses the need to engage with communities at a local level. The communities will readily identify and provide information on particular pest plants. The council needs to undertake a roadshow and promote its work in local publications such as the Karamea Chronicle and Reefton Clarion. Money should be set aside for one roadshow during the life of the plan, and for local promotion.

Decision

Accept in part

Reason

Support for this section is noted. However, there has been substantial public information on weeds provided by the Council over the past five years. The Council website has a wealth of information. The Council has also participated in the weedbusters group which has produced educative information that is distributed by the Council's information officer, therefore roadshows are not considered necessary at this time. The Council will however, consider using publications such as those suggested by the submitter, to explain the new rules when the Strategy is made operative.

Decision Requested: 5.6**Submitter**

6

WCCB

As indicated earlier, the role of district councils should be broadened to include planning and identification (in 7.3).

Decision

Noted

Reason

The Regional Council is not in the position to dictate to the District Councils. However the District Councils are involved through the Strategy as a land owner, and have been included in the development of the Strategy through the public notification process.

Decision Requested: 5.7**Submitter**

6

WCCB

The Board considers that an annual planning and review meeting should take place which would include major stakeholders including DOC, NZTA, local councils, NZ Rail Corp, LINZ, WC Conservation Board. This would review mapping, the previous year's work, identify any new incursions, coordinate a regionwide approach to control for the coming year, and identify areas needing public input or information to be shared (in 7.5).

Decision

Reject

Reason

Annual planning and review meetings are considered unnecessary for this Strategy. The Council

and Department of Conservation are the lead agencies for the Strategy and communicate regularly. The 5 year review period for the Strategy is considered sufficient for the involvement of the wider agencies identified by the submitter.

Decision Requested: 5.8

Submitter

6

WCCB

These plants (in 7.7) need to be itemised separately as 7.7.1, 7.7.2, and 7.7.3 or similar. The order needs to be reflected in the Appendix Two.

Decision

Reject

Reason

There is no further benefit gained from reformatting the Strategy as requested by the submitter.

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