Regional Pest Management Plan

Proposal made by Council on 19 September 2019 to incorporate a programme for pest conifer

Staff report and recommendations on submissions

Record number: 202481

29 January 2020

Opening date: 6 November 2019

Closing date: 29 November 2019

Number of submissions received: 21

Note – some submission points may have been paraphrased. For full detail, please see the copy of submissions received.

Submitter no.	Name	Support/Oppose	Submission point		Staff Recommendation	Reason/comment
1	Clapham, Martin	Support	1a	Desire for volunteers to play an important role, particularly on public land, including support via training and physical resources. Information to be captured for project managers and coordinators.	Noted	Given the management of pest conifers occurs at such large scales, it can be difficult to determine where and how volunteer inputs can be effective and sustainable. However, when operational plans are being prepared, Council could advocate for the project manager to acknowledge and/or identify where volunteer inputs may contribute to the overall operation in an effective way.
2	Davies, Olly	Support			Noted	
3	Evans, Geoff	Support in part	3a	Firstly and foremost we must acknowledge that adequate funding has not yet been allocate from Central Government. That means that the budgets created for this project are impossible to implement at present. Therefore the “status quo” must remain and the new changes to plan should be reconsidered.	Reject	The submitter has identified a key issue in terms of adequate level of funding. That is a key reason why the proposed programme objective is Progressive Containment as opposed to an objective such as Eradication. At the present time, the status quo is no regional regulatory framework for pest conifers. Through the 2018 RPMP review process, this proposal process and also consultation with the community and respective agencies over the last 2-3 year period, there has been a consistent and strong desire to see a framework put in place.

			3b	The new rules 5.22.2. (1 to 4) may fit in some areas but do not fit all. One size does not fit all. They do not fit the identified legacy areas where responsibility must remain that of territorial Authorities i.e. Council and Central Government. The High Risk pest Conifer Area Map on page 13 is, in my view, far too broad and inevitably will contribute to unrestricted spread. This has happened in the past with the much smaller Containment Control Zone. The proposed rules are not adequate to restrain this growth within the mapped area.	Noted	The purpose of the proposed programme Rules are aimed at putting in place some baseline obligations. Rules themselves are not intended to steer or direct all actions or activities. The proposed means of achievement are measures that are intended guide what occurs to achieve the programme objective, with Rules being part of that. There are also exemption provisions available under section 78 of the Biosecurity Act 1993 for any case-by-case situations where an occupier may feel the obligation is clearly unreasonable or inappropriate. The proposed High Risk Pest Conifer Management Area (Map 10), is tied to specific Rule 5.22.2.2. The purpose of the Rule is to place an obligation of occupiers outside of this mapped area. It is not intended to guide or direct management interventions inside the defined area. The active operational plans and management activities delivered by the National Wilding Conifer Control Programme (NWCCP), Community Trusts, agencies or landowners themselves will determine what occurs in these areas.

			3c	Thirdly, the approximately 8000 ha adjacent to the Wye river reserve comprising the former Catchment Control Zone and the areas that were planted by central and local Government must remain and be sustained. Included in this zone is 650 ha approx of private land. This area is detailed in my previous submission. For the Evans family this is an area of major concern. The High Risk Pest Conifer Management Area map on page 13 and the proposed rules do not supply the certainty to reduce conifer infestations. They do not allow certain relief for those who have previously had Catchment Control zone imposed on their properties. These Catchment Control zones were created by Council at the suggestion of their consultants. The concept behind this zoning was to allow infill of trees in unproductive lands and reduce Council responsibility. There were very few wildings originally in this zone. In the years since zoning was implemented substantial infill has occurred. Conditions were designed and agreed in conjunction with other works to control spread of conifers from the sources and with consultation with affected landowners as to the zone boundaries (ref Ledgard Report). These conditions were not funded and did not happen. Removal of this zoning means that private landowners could be potentially liable in the future for removal of all wildings. The new mapped area apparently leaves enforcement as discretionary to Council. Private land owners need the certainty of legal protection as was afforded by the former zoning. The growing lack of trust between Government and affected landowners demands this.	Noted	The submitter makes reference to the mapped "Containment Control Area" (CC identified as part of the programme for *Pinus contorta* in the former 2007 Regional Pest Management Strategy (RPMS). These provisions were retained as part of the 2012 'roll-over' of the RPMS pending legislative change. When the new Regional Pest Management Plan was made operative on 1 October 2018, as a result of decisions during the review process to not include a programme for 'wilding conifers', this in effect removed all regulatory provisions, including the former CCAs. The provisions in the proposed programme for pest conifers does not place any obligation on occupiers of land affected by the former CCAs given they all occurred in areas inside the proposed High Risk Pest Conifer Management Area. As to certainty over what occurs for infestation inside the High Risk Pest Management Area, active operational plans and management activities delivered by the National Wilding Conifer Control Programme (NWCCP), Community Trusts, agencies or landowners themselves will determine this. Given the complexities involved, it would be extremely difficult to articulate this in the proposed programme. Upon producing, and updating annually, the required Operational Plan for the RPMP, Council will endeavour to provide further detail as it becomes clear what will be occurring.
			3d	The upper Waihopai catchment needs a much wider plan or the mistakes of the past will inevitably be compounded. These are very fragile mountain lands and removal of any vegetation could have adverse effects on water quality, quantity and sedimentation. Collateral damage to biodiversity and indigenous vegetation is inevitable with the "boom spray" techniques that would have to be used. Flooding on the Wairau plain was the main reason these trees were established by local authorities in the first place. There needs to be a plan to revegetate the areas that are "boom sprayed". This is not covered by the RPMP. If nothing is planned nature will fill the vacuum. These downstream effects have not been considered. A comprehensive plan is essential for the environmental health of the catchment and the Wairau plain itself.	Noted	The submitter correctly notes that these matters are not addressed by the RPMP but are considered as an operational planning matter.

			3e	Finally the Evans family have spent many years trying to cooperate with the local authorities, trying to resolve the issues created by Governments establishment of these forests. Our suggestions are noted in my attached 2018 submission. While a member of Council I arranged for the Mayor, Councillors and staff take a helicopter flight to see and gain an understanding of the size and scope of this issue. The flight was cancelled. I suggest it would now be really worthwhile for the decision makers (hearing panel and the Mayor) to take this flight.	Noted	
			3f	Relief sought: That the Wye Containment Control Zone be sustained as originally intended as a separate entity.	Reject	The submitter makes reference to the mapped "Containment Control Area" (CC identified as part of the programme for *Pinus contorta* in the former 2007 Regional Pest Management Strategy (RPMS). These provisions were retained as part of the 2012 'roll-over' of the RPMS pending legislative change. When the new Regional Pest Management Plan was made operative on 1 October 2018, as a result of decisions during the review process to not include a programme for 'wilding conifers', this in effect removed all regulatory provisions, including the former CCAs. As to certainty over what occurs for infestation inside the former CCAs, active operational plans and management activities delivered by the National Wilding Conifer Control Programme (NWCCP), Community Trusts, agencies or landowners themselves will determine this. Given the complexities involved, it would be extremely difficult to articulate this in the proposed programme. While it may not be defined in the RPMP policy, 'containment areas' may continue to be utilised as an operational tool depending on the nature and feasibility of managing an infestation.
			3g	That the responsibility for control of legacy infestations remain that of the authorities who created the problem in the first place.	Accept in part	As a primary means of achievement, the National Wilding Conifer Control Programme (NWCCP) has been identified as a key intervention measure. The NWCCP is funded via a joint central government budget across the Ministry for Primary Industries, Department of Conservation and Land Information NZ. The matter of "legacy plantings" has been the premise of central government investment. However, in terms of effectively delivering management programmes, a forward looking approach is taken that includes many other local stakeholders who may benefit or also exacerbate the issue.

			3h	That a Council led review of the whole catchment and all issues be implemented.	Noted	A decision to look at a broader catchment approach is a matter outside of the scope of this proposed programme. Of note is that Council did instigate such a review and look at broader catchment matters in 2019. As a result of that, the feedback received by Council tended to focus on the wilding conifer issue which was perceived by the community to be the greatest issue at the time facing the catchment. The other matters such as erosion and land sustainability continue to be part of the science and land management work programmes at Council.
4	Federated Farmers	Support	4a	The Marlborough province of Federated Farmers (FFNZ) welcomes this opportunity to submit on the Marlborough District Council's (MDC) proposal to amend the Regional Pest Management Plan to include wilding conifers. Pest and weed control is important to farmers and primary producers. As an organisation, we regard pest and weed management as an important component in protecting land based primary production. FFNZ members and other rural landholders are custodians of the land and have a vested interest in protecting natural resources from unwanted pests. FFNZ supports the inclusion of wilding conifers in the RPMP The New Zealand Wilding Conifer Management Group developed a Management Strategy for wilding conifers in 2014. However, as this Strategy is non-statutory, it is appropriate to include wilding conifers in the Regional Pest Management Plan to ensure there is regulatory oversight of activities to control these trees.	Noted	

			4b	FFNZ commends the MDC for the inclusion of a Good Neighbour Rule (GNR) for wilding conifers. Early intervention with wilding spread is the most cost-effective method as it avoids much higher future costs as infestations spread and become denser. Increased control is needed to reduce the area of wilding conifer affected land and to stop their spread. Relief sought FFNZ seeks that the proposed GNR distance is increased to **500m** for Douglas fir and larch. We are seeking this amendment as these two species are shade tolerant and their seed can spread over large distances easily. Most wilding conifer species do not pose a significant threat to established native forest; however, Douglas fir has a higher shade tolerance than other introduced conifer species and can consequently spread into shrub lands, regenerating native forest and mature forest where there are canopy gaps and a relatively sparse understory. This can be particularly problematic where these areas of native forest are on the property boundary and are part of a Significant Natural Area (SNA). FFNZ acknowledges and supports the funding that MDC provides for SNAs, and by incorporating the relief sought will augment the investment in SNAs.	Reject	One of the early pieces of work after the New Zealand Wilding Conifer Strategy 2015-2030 was released was the production of guidance material for developing pest management plan programmes and rules. This was part of Objective 4.1 of the Strategy: Promote consistency in policy across organisations. Within the guidance, a distance of 200m was based on consideration of the most common spread characteristics of conifers (wind borne and gravity seed dispersal) and the distance within which the majority of seed dispersal occurs, even though it is possible, under certain conditions, for conifer seed to be dispersed over much greater distances[1] (also see relevant extracts in Appendix 1). It is acknowledged that this guidance did not go into species-level distances but utilised a number of information sources listed in Appendix 1 of the guidance document. The ultimate aim of the good neighbour provisions, and distance, was to address the fringe spread from sources – in other words the area where the bulk of seed, not all, will fall. The other issue with greater setback distances is consideration of the requirements for Good Neighbour Rules in accordance with clause 8 of the National Policy Direction for Pest Management. A greater setback distance – in this case > 2 times larger than proposed – would make the Rule more difficult to justify in terms of clause 8(1)(d) – thus placing a requirement greater than what may be required by the adjoining occupier. Is also needs to be noted that the proposed Good Neighbour Rule does not capture plantation forests of Douglas fir and non-hybrid European larch due to the definition of the subjects of the pest conifer programme.

[1] Page, Tamsin (2016). Wilding Conifer Pest Management Plan Rule Development Project. Guidance, and recommended template provisions and narrative for use in wilding conifer pest management programmes within Regional Pest Management Plans throughout New Zealand. Prepared for Ministry for Primary Industries by Tamsin Page. April 2016.

5	Forest & Bird	Support	5a	Forest & Bird supports inclusion of all listed subjects. There are concerns that some species of pine aren't included, and it has been suggested they are less risky, e.g. *Pinus attenuata*. However, we have heard that wilding problems may still exist with that species, and therefore suggest it should be included in Table 2.	Reject	Many plant species, including conifers are able to self-reproduce, even at distance, but the nature and degree of this 'spread' determines the level of concern from a biosecurity perspective. There has been no such evidence provided of *Pinus attenuata* showing invasive characteristics with the suggestion that no addition to Table 2 takes place at this time. Note - Should further species be added to Table 2, this has the result of the wilding form of those species being declared a pest and proposed Rules 5.22.2.1, 5.22.2.3 and potentially 5.22.2.4 applying.
			5b	In the section "why are they a threat", there is no mention of the threat posed by Douglas fir to existing established native forest. This should be acknowledged, as controlling Douglas fir in native forests poses significant control issues.	Accept	While the "why are they a threat" section is very much for context, this section is also used in the resulting Plan material. As such, further text specifically referencing the shade tolerance of Douglas fir can be easily added. Suggested addition: "Pest conifers grow faster and taller than low-stature vegetation so can easily out-compete these species. The likes of Douglas fir, being shade tolerant, can also readily establish in closed forest ecosystems. This can make control operations additionally challenging. Soil and soil fauna…"
			5c	We support the objective of Progressive Containment.	Noted	
			5d	Funding by Council should be included as a measure to achieve the objective.	Reject	The structure of proposing and making pest management plans (see sections 70 – 77 Biosecurity Act 1993) means costs and funding are addressed as separate matters. Principle measures and/or means of achievement are those tangible 'things' that are intended to be done physically to deliver the programme. When Council is making a decision on levels on funding or other resources available – both from Council and more importantly other parties for pest conifer management – the nature and scale of those principle measures and/or means of achievement get determined.
			5e	Support Rule 5.22.2.1	Noted	
			5f	Support Rule 5.22.2.2	Noted	

			5g	Support the intention of Rule 5.22.2.3 - although 200m seems a very short distance, and should be increased to at least 500m Support Rule 5.22.2.4 - although again the distance should be increased.	Reject	One of the early pieces of work after the New Zealand Wilding Conifer Strategy 2015-2030 was released was the production of guidance material for developing pest management plan programmes and rules. This was part of Objective 4.1 of the Strategy: Promote consistency in policy across organisations. Within the guidance, a distance of 200m based on consideration of the most common spread characteristics of conifers (wind borne and gravity seed dispersal) and the distance within which the majority of seed dispersal occurs, even though it is possible, under certain conditions, for conifer seed to be dispersed over much greater distances[2]. It is acknowledged that this guidance did not go into species-level distances but utilised a number of information sources listed in Appendix 1 of the guidance document. The ultimate aim of the good neighbour provisions, and distance, was to address the fringe spread from sources – in other words the area where the bulk of seed, not all, will fall. The other issue with greater setback distances is consideration of the requirements for Good Neighbour Rules in accordance with clause 8 of the National Policy Direction for Pest Management. A greater setback distance – in this case > 2 times larger than proposed – would make the Rule more difficult to justify in terms of clause 8(1)(d) – thus placing a requirement greater than what may be required by the adjoining occupier. Is also needs to be noted that the proposed Good Neighbour Rule does not capture plantation forests of Douglas fir and non-hybrid European larch due to the definition of the subjects of the pest conifer programme.
6	Leigh, Chandra	Oppose	6a	Trees absorb and store carbon dioxide which is driving climate change, threatening the survival of life on earth.	Noted	As part of the analysis for the proposal, carbon sequestration was acknowledged as a benefit of conifers both growing and expanding. However, when balanced against the negative impacts of unabated spread, they were determined to outweigh the benefits from carbon sequestration. In areas such
			6b	Removing trees that threaten ecosystems is short sighted and counterproductive as those ecosystems won't exist unless radical efforts are made to save our planet.		

[2] Page, Tamsin (2016). Wilding Conifer Pest Management Plan Rule Development Project. Guidance, and recommended template provisions and narrative for use in wilding conifer pest management programmes within Regional Pest Management Plans throughout New Zealand. Prepared for Ministry for Primary Industries by Tamsin Page. April 2016.

			6c	Conifers ability to self-seed and grow its own forest is a tool which we should be using in our favour. Reforestation is implicit to our survival by way of reversing greenhouse gas emissions.		as the Marlborough Sounds, regeneration of native woody vegetation has shown to be both rapid and create a more sustainable carbon sink. The vision for the National Wilding Conifer Strategy 2015 is “The Right Tree in the Right Place”. The issue proposed to be addressed via the programme, in conjunction with the National Wilding Conifer Control Programme is aimed at managing conifers that are the wrong tree, wrong place or both.
			6d	Every conifer removed is releasing carbon dioxide back into the atmosphere and discarding a tool to remove and store carbon dioxide. Understand the threat to slow growing NZ natives but the plant must be restored.		
7	Marlborough Sounds Restoration Trust	Support	7a	MSRT agrees with the definition of wilding conifers (proposed Section 5.22, Table 1 & 2). Douglas fir, Bishops pine, maritime pine, radiata pine and Mexican weeping pine are all present in the Sounds and have demonstrated wilding characteristics. It is submitted that the species in Table 1 that constitute high-risk species should be identified.	Noted	
			7b	MSRT strongly supports the Rules proposed in the Plan (proposed Section 5.22.2). The rules give MSRT the opportunity to hand over the management of any of its management sectors back to the landowners. Presently, MSRT is active in six of fourteen management sectors in the Marlborough Sounds, but in order to progress into new sectors, it needs an exit strategy from those sectors it is currently active in.	Noted	
			7c	With regard to Rule 5.22.2.1, it is submitted that the definition of a control operation be amended to read “*control operation means an operation to remove pest conifers from the land to a point where there are no mature, coning trees remaining which pose a seeding threat and also no seed rain from adjacent land that could cause unreasonable levels of re-infestation.*” This amendment is proposed as the Trust often leaves trees within control operations, such as those adjacent to houses, roads etc, where these trees either have some amenity value or are difficult to remove safely, but which pose little risk of on-going wilding conifer recruitment because of their location. Alternately, a control operation could be defined as one where “*wilding conifer infestations have been managed to a level where coning trees are at, or close to, zero density and also where there is no seed rain from adjacent land that could cause unreasonable levels of re-infestation*”	Accept	The submitter draws attention to a reality in control operations where some mature trees may not be removed yet not pose an ongoing threat. The proposed explanatory note for rule 5.22.2.1 not allow for this meaning any such situation would need to be managed by way of a section 78 exemption to the rule. Given this situation would likely occur on a fairly common basis, exemptions may not be an appropriate method to address this scenario. Suggested alteration: Note: For the purposes of Rule 5.22.2.1, control operation means an operation to remove pest conifers from the land to a point where infestations have been managed to a level where coning trees are at, or close to, zero density and there is also no seed rain that could cause unreasonable levels of re-infestation. Occupiers will be notified by the management agency should a control operation meet this threshold, triggering the obligation under Rule 5.22.2.1.

			7d	With regards to Rule 5.22.2.3, it is unclear why the rule requires removal prior to cone bearing age. The good neighbour obligation should equally apply to mature pest conifers as well. Just removing immature plants, while leaving mature plants, will provide minimal mitigation for neighbours. As this may create unreasonable obligations for many landowners, the scope of the rule can be limited to high-risk species only. It is submitted that the wording for the rule be amended to read "*Occupiers shall destroy all pest conifers identified as high-risk species in Table 1 present on land they occupy within 200m of an adjoining property boundary, ~~prior to cone bearing~~, where that adjoining property has previously been cleared through control operations and that adjoining occupier is taking reasonable steps to manage wilding [pest] conifers, within 200m of the boundary*." Table 1 should be amended accordingly to identify the following as high-risk species - contorta, Scots, mountain, Corsican pine. Such an amendment is in line with the risk classifications adopted through the National Wilding Conifer Programme and in The Management and Control of Wilding Conifers in South Marlborough 2017-2030 (Macalister, 2017).	Accept in part	The submitter correctly notes that the inclusion of a limitation of "prior to cone bearing" results in the proposed rule not capturing for example the large quantity of mature coning wilding conifer infestations in existence at the time the amendment RPMP may become operative. The submitter also correctly notes that the simple removal of that limitation would result in an extremely large, and potentially disproportional obligation on occupiers – particularly in the Marlborough Sounds. These costs were not factored into the analysis as part of the proposal and this change would require a new analysis of benefits and costs to be undertaken. The submitter suggests to limit this obligation but narrowing the scope of Rule 5.22.2.3 to the subjects in Table 1 only and narrowing that even further by denoting particular high-risk species. Suggested alteration to Rule 5.22.2.3: "Occupiers shall destroy all pest conifers present, listed as individual subjects in Table 1, on land they occupy within 200m of an adjoining property boundary, ~~prior to cone bearing,~~ where that adjoining property has previously been cleared through control operations and that adjoining occupier is taking reasonable steps to manage wilding conifers, within 200m of the boundary." With the example of mature wilding radiata, this alteration would mean they would still not be captured by Rule 5.22.2.3 but continue to be captured by the pest declaration. This means Council would have the ability to use administrative powers under Part 6 of the Act to take action where it is considered necessary. It needs to be noted that the suggested alteration above captures all the subjects within Table 1, not narrowing the scope further as requested by the submitter. The impact of this, in terms of generating obligations on occupiers that may have stands species such as *Pinus ponderosa*, *Pinus patula* etc, may need to be explored. Keeping in mind that this Rule is requiring only the 200m setback, not compete destruction.

8	Marlborough Tramping Club	Support	8a	Recognises that goals need to be set, and a coordinated approach needs to be made to realise these goals. We see wilding conifers as an extreme threat to the landscape and biodiversity values in Marlborough that we value highly. We have observed the gradual encroachment of the conifers in the wild lands in which we recreate, and call for a halt in that encroachment.	Noted	
			8b	We support the councils statement that this needs to be a long term plan, with gains made backed up so there is no re-infestation. We would like to see complete eradication eventually, but realise progressive containment is most appropriate in the short term at least, providing this includes a halt to the spread of the problem in the many areas they are spreading at present.	Noted	
			8c	Even within the 'heartland' of the conifer plantings: the Branch/Leatham area, control efforts need to be made – and can be effective in retaining the landscape and biodiversity values. We consider it imperative that the wilding conifers not be allowed to spread to presently clear areas of the Raglan Range. We are also very concerned with the Conifer problem in the Upper Waihopai Valley, and have communicated these concerns to the council previously.	Noted	The Waihopai Management Unit is recognised by the National Wilding Conifer Control Programme as being of priority. However, the current level of funding available has meant that the substantial investment required to commence the progressive containment approach has not been able to commence. An issue in the Branch/Leatham Management Unit is the sustainability of commencing operations inside the catchment without adequate levels of resources and a clear plan. In both these areas, Council is not singularly responsible for operational decisions. However, Council (as Management Agency for the RPMP) can advocate for any operational planning to align with the overall progressive containment approach, where this is both a sustainable use of resource and also feasible.

			8d	Suggest Douglas fir planting be banned, and existing plantations should be phased out as they mature. May also need to be included in Table 1 as a wilding conifer along with radiate pine.	Reject	The National Environmental Standard for Plantation Forestry (NESPF), made under the Resource Management Act 1991 addresses afforestation, including that of Douglas fir. This regulation prevails over any inconsistency that may occur with the Biosecurity Act 1993 or rules within a Regional Pest Management Plan (see sections 7 and 69 of the Biosecurity Act 1993. The subjects listed in Table 1 would subsequently be declared pests in all their forms. To include both Douglas fir and Radiata pine in this table would in effect prevent all sale, propagation and communication [movement, planting] under section 52 and 53 of the Biosecurity Act 1993. While this would address the submitter's request, however it would also derogate from the provisions of the NESPF which must not occur under section 7 of the Biosecurity Act 1993.
			8e	The proliferation of plantings of any conifer pests in the name of carbon sinks or carbon credits for climate change prevention should also be discouraged in favour of more suitable species of trees, and there should be requirements for landowners registering wilding conifers for carbon credits to manage those wildings in a way that prevents further spread, or be responsible for the spread.	Reject	The National Environmental Standard for Plantation Forestry (NESPF), made under the Resource Management Act 1991 addresses afforestation. Of note however is the definition of a 'plantation forest' can easily be interpreted to exclude afforestation for the purposes of carbon sequestration. As a result, the default regulation for afforestation for the purpose of carbon sequestration only falls back to the Proposed Marlborough Environment Plan, Wairau Awatere Resource Management Plan and/or Marlborough Sounds Resource Management Plan. It is recommended that afforestation is addressed as a land use matter as opposed to regulation via the Regional Pest Management Plan. This is to both avoid duplication and also cross-statue inconsistencies/derogations.
			8d	We would like to commend the work done by the Mid Dome Wilding Trees Trust as an example of what should be considered for Marlborough. We also commend work that has also been carried out for decades in the central North Island with good results. Without it parts of the Tongariro National Park would now resemble the infested areas of Marlborough! In both these areas work has been carried out by contractors and landowners, as well as large volunteer efforts.	Noted	Collaborative then centralised delivery of operations is the direction supported by Council.
9	Mason, Bernie	Support	9a	Every effort should be made to prevent their spread and reduce infested areas over time wildling pines are infesting all alpine areas in Marlborough not just well known places. For example the Ferny Gair area between the Awatere and Waihopai above the bush line there are thousands of seedling trees, areas like this need to be dealt with before seeders become established. All boundaring farmland should be inspected and dealt with as per Nassella tussock.	Noted	Monitoring and surveillance of currently clear land, surrounding infested areas is intended to be factored into operational delivery programmes. This would both inform active operations and play a part ensuring occupiers comply with such rules that may require the destruction of pest conifers.

			9b	With modern techniques such as aerial spraying it is possible to control and eventually eradicate these trees. High country farmers with heavy infestations will need assistance but there is no excuse for not making an effort. I worked as a DOC ranger for 4 months on Molesworth managing tourists coming through and in my spare time cut by hand over a thousand trees so I have first-hand experience of what can be achieved.	Noted	
10	Ministry for Primary Industries	Support	10 a	Rule 5.22.2.1 Recommend identifying the date that responsibility for continued control begins. For example, the addition of 'undertaken since this plan became operative' (or other date relevant for the Council) after '...land which has had a control operation'.	Reject	The explanatory note for Rule 5.22.2.1 outlines that occupiers will be notified by the management agency should a control operation meet the threshold of triggering the obligation for ongoing management. It would also be a fair assumption that up until that point, the occupier will be aware of the control operation itself. For control operations that commenced before the plan becoming operative, the management agency is able to use discretion with the notification process to agree on a 'handover' process and/or timeframe. As a result, suggest not adding a requirement to incorporate a date reference.
			10 b	Suggest clearer guidance on how 'unreasonable levels of re-infestation' will be defined. Suggest this assessment be undertaken in accordance with recognised methodology or calculator that takes into account risk of seed dispersal, location, topography.	Accept	Agree that adding further guidance would be beneficial. Suggesting wording: "…unreasonable levels of re-infestation. This assessment to determine unreasonable levels of re-infestation will take into account risk of seed dispersal from sources that can affect the property, vulnerability and nature of the land cover on the property."
11	Nicholson, Dianna	Support			Noted	
12	Pointon, Don	Support			Noted	
13	Smith, Brian	Support	13 a	Control of wilding pines should extend to those growing on private property in residential zoned areas with the land owners being legally required to control them by removing them.	Noted	All occupiers of land with Marlborough, rural or residential, are obliged to comply with any Rules that may apply to them. Each situation that may occur would be assessed to determine whether an obligation applies. It needs to be noted the Rules may not require all pest conifers to be destroyed. However, Council would have the ability to use administrative powers under Part 6 of the Act to take action where Council considers it necessary.

14	South Marlborough Landscape Restoration Trust	Support	14 a	The South Marlborough Landscape Restoration Trust submits that the Awatere Management Unit needs to be added to the High Risk Pest Conifer Management Area. During our 2018 and 2019 operations in the Awatere Management Unit we have found and treated more than 20 new contorta infestations. As Contorta is already seeding into the area, and is a high risk wilding conifer species, the RPMP needs to reflect this high risk in the Awatere. As we estimate the nearest seed source is more than 20 kms away, this points to "seed rain" caused by significant wind events.	Reject	By way of the explanation of the High Risk Pest Conifer Management Area, as proposed it is considered reasonable for occupiers outside of the currently defined area, including the Awatere Management Unit, to destroy high risk species from Table 1. This is given the appearance of these species outside of the proposed High Risk Pest Conifer Management Area is sporadic and at relatively low levels. There are also exemption provisions available under section 78 of the Biosecurity Act 1993 for any case-by-case situations where an occupier may feel the obligation is clearly unreasonable or inappropriate. It is noted that by way of the current Rule wording, it excludes any more mature cone-bearing trees (although these are obviously the key initial target of any existing operations).
			14 b	Even though the SMLRT was consulted during a workshop on 22 November 2018, we want to reiterate our support including wilding conifers into the RPMP and any "on the ground" initiatives which help to control wilding conifers. We have just hosted the Minister of Conservation to view wilding conifer infestations in South Marlborough and particularly the urgency to begin wilding control operations in the Branch Leatham. Here is Eugene Sage MP's Facebook post 27 November 2019: *"Wilding conifer spread in Marlborough's Wairau valley is impacting on native forests, river flows, and pastoral farming.* *Tenacious and focused work by the South Marlborough Landscape* *Restoration Trust to control wildings is impressive. It has kept* *tussocklands clean, restored steeplands, and prevented the infestations getting so much worse, The Trust has an ambitious plan to remove dense wilding infestations in the Leatham valley and beyond to protect native landscapes from Molesworth to Nelson Lakes. My job is to find some serious funding to tackle a serious problem."*	Noted	
15	Spooner, Jill	Support	15 a	I am a recreational hiker living in Marlborough. The uncontrolled spread of wilding pines is of major concern from an economic and a landscape/environmental perspective. I have been involved in manual wilding pine control activities both here and in Canterbury. Something far more intense and co-ordinated needs to be done.	Noted	

16	Stonehouse, Jack	Oppose	16 a	“What is a weed? A plant whose virtues have not yet been discovered.” I do not see pine trees as being the harmful organisms referred to in the Biosecurity act but unfortunately I haven't had time to study the act lately.	Noted	The proposal for this amendment contains an analysis to covers impacts of pest conifers as part the reasoning for the programme. The Biosecurity Act 1993 itself does not outline which organisms are harmful but allows for tools such as National and Regional Pest Management Plans to be made which detail specific organisms to be identified and managed.
			16 b	It may be different in other areas but in my opinion in Nydia Bay Pine trees need not be considered a pest but should be utilised as a resource where practical. Pine trees planted as a shelter belt are not in fact a pest & should not be defined as if they were.	Noted	If the trees the submitter refers to are wilding Radiata pine, while they may be captured by the declaration of the listed subjects being ‘pests’, there is no proposed obligation by way of Rules for their destruction. However, while the Rules may not require destruction, Council does have the ability to use administrative powers under Part 6 of the Act to see pest destroyed or direct other action, but only where Council considers it necessary. In the environment of the likes of many parts of the Marlborough Sounds, it would be difficult to justify the use of such powers and suggest Council support community-led approaches.
			16c	The attempt to eradicate spartina may well be a contributing factor to the PSP happening in Nydia Bay in recent years. Clear felling or poisoning pine trees are likely to be factors as well. The environmental cost of such ignorant interference with nature is too high. The erosion resulting from the destruction of pine trees in this area will be costly.	Noted	
			16 d	Has the cost of the carbon emission climate change that will result been taken into account? Have you taken into account the requirements of The Climate Change Response Act 2002?	Noted	As part of the analysis for the proposal, carbon sequestration was acknowledged as a benefit of conifers both growing and expanding. However, when balanced against the negative impacts of unabated spread, they were determined to outweigh the benefits from carbon sequestration. In areas such as the Marlborough Sounds, regeneration of native woody vegetation has shown to be both rapid and create a more sustainable carbon sink. The vision for the National Wilding Conifer Strategy 2015 is “The Right Tree in the Right Place”. The issue proposed to be addressed via the programme, in conjunction with the National Wilding Conifer Control Programme is aimed at managing conifers that are the wrong tree, wrong place or both.
			16 e	Poisoning pine trees while you might claim cost effective is a **dangerous** thing to do on occupied land. What about the cost when somebody is injured or killed by random falling branches? This is not reasonable.	Noted	It is noted that in all control operations, the safety of workers or other people is considered. As a result, it is common place for some trees to be identified as being higher risk if left to decay standing and they are either left or an alternate method of control chosen. These matters are addressed at the operational level.

			16f	People who do not live here must not be permitted to decide what should happen on my property. I know the suitable course of action to take as I have lived here & observed what happens for more than 30 years. Marginal farmland that may be better utilised as forestry any way could be different but I don't see why.	Noted	
17	Queen Charlotte Sounds Residents Association	Support	17 a	This submission is from the Queen Charlotte Sound Residents Association. Support for the proposed amendment, with some suggestions, is based upon 30 years of attempting to control wilding pines in QCS via a variety of schemes. Working with MSRT via financial and other contributions; encouraging both community and individual initiatives to control and where possible remove pest conifers. This submission is therefore to request better consideration for the Marlborough Sounds	Noted	The extent of the proposed programme is for the whole Marlborough region. While the specific Rules may not require destruction or other obligations specifically in the Sounds, Council does have the ability to use administrative powers under Part 6 of the Act to see pest destroyed or direct other action. However, this can only occur where Council considers it necessary. In the environment of the likes of many parts of the Marlborough Sounds, it would be difficult to justify the use of such powers and suggest Council support community-led approaches in the first instance.
			17 b	Subjects of the pest conifer programme – background to wilding pines on or near the foreshore reserve. Consequently under page 9 “description" this should include "nearby land" to specifically mention Sound Foreshore reserve and Conservation land in the Sounds.	Reject	The description for ‘wilding conifers’ in Table 1 is to clarify which forms of those species in Table 2 are captured by the definition of a pest conifer. This description and the resulting class of subjects is not affected by land tenure.
			17c	In addition these issues would also be better addressed by adding to page 15 “impacts". As per the Sounds both: a) Water quality many of us draw our house water from streams in the area. b) Water safety navigational issues. Access for many in the Sounds is via water only (See separate Sounds Administrative rates Area). Safe water access in the Sounds can be adversely affected if wilding pines are not removed from areas adjacent to the CMA. Such control and removal should be prior to the anticipated sea level increase with this review process giving weight to that anticipated sea level raise.	Noted	The material in the analysis of benefits and costs (page 14-19) is used to solely justify the proposal, and does not appear as part of any amended RPMP. Given the submitter supports the proposal, and is not objecting based on a component of the analysis, suggest that the submission point is noted.
			17 d	Progessive Containment - a plan for this should be initiated ASAP for the Sounds.		

			17 e	Providing Regional Leadership - this association was one of the first to work with MSRT. Collectively this Association raised funds from individual property owners, supplied free accommodation etc a couple of decades ago. Prior to that the local home owners both permanent and holiday home owners worked with a Doc employee to carry old fashioned tools and supplies to try a "test regime" re pine tree poisoning. Consequently Regional Leadership must give “weight" to the acknowledged view of Council over previous regional resource Management Plans that the Marlborough Sounds is the jewel in the crown of Marlborough Regional Area. Consequently via this proposed amendment the Marlborough Sounds should be identified as a separate area which will have its own map as per 'High Risk Pest Conifers Management Area”.	Reject in part	It is noted that Council has been for >10 years and plans to continue to support the Marlborough Sounds Restoration Trust MSRT) in their endeavours to manage pest conifers. This is part of the ‘regional leadership’ Council wishes to build upon. Moving forward, should the proposed programme become operational, it is anticipated that Council’s involvement would need to increase to have a more active role in seeing the likes of the MSRT succeed to a greater level. – ultimate objective being the Progressive Containment of pest conifers. In reference to Map 10 referred to by the submitter - this is solely for the purposes of Rule 5.22.2.2, not to define particular areas of ‘importance’. There is no limitation proposed as to the extent of the RPMP, and proposed pest conifer programme, as a whole. This remains as the entire Marlborough region. Note that while the proposed programme may apply to the whole Marlborough region, and the listed subjects may be captured by the declaration of ‘pests’, any specific obligation is specified in the proposed Rules. These may not apply everywhere to all people and/or to all occupiers. However, while the Rules may not place an obligation, Council does have the ability to use administrative powers under Part 6 of the Act to see pest destroyed or direct other action, but only <u>where Council considers it necessary.</u>
			17f	Page 15 regarding impacts - gives a passing reference to the Marlborough Sounds; It would be more appropriate for issues as per this area to be researched as per the effects of historic allowed conifer plantation and thus the spread of wilding conifers. In respect to this I believe that the Marlborough Sounds should be included in the high-risk management area I doubt that MDC has undertaken any research or has any cumulative knowledge. So a "precautionary" approach with respect to the Marlborough Sounds must become mandatory.	Noted	The material in the analysis of benefits and costs (page 14-19) is used to solely justify the proposal, and does not appear as part of a potentially amended RPMP. Given the submitter supports the proposal, and is not objecting based on a component of the analysis, suggest that the submission point is noted.

			17 g	Map 10 high-risk pest conifer management areas - with regard to the Marlborough Sounds it is apparent that no research has been conducted regarding historic plantation conifer plantations that were subsidized and now may also receive further support. This suggested review proposal must address the totality of effects in this remote and isolated area. Such should be inclusive of historic concerns and complaints regarding issues in various areas in the Marlborough Sounds.	Reject	In reference to Map 10 referred to by the submitter - this is solely for the purposes of Rule 5.22.2.2, not to define particular areas of 'importance'. There is no limitation proposed as to the extent of the RPMP, and proposed pest conifer programme, as a whole. This remains as the entire Marlborough region. Note that while the proposed programme may apply to the whole Marlborough region, and the listed subjects may be captured by the declaration of 'pests', any specific obligation is specified in the proposed Rules. These may not apply everywhere to all people and/or to all occupiers. However, while the Rules may not place an obligation, Council does have the ability to use administrative powers under Part 6 of the Act to see pest destroyed or direct other action, but only <u>where Council considers it necessary.</u>
			17 h	It is strongly recommended that the view that the spread of wilding conifers to adjacent areas, inclusive of public areas, in the Marlborough Sounds is inevitable is not acceptable. Consequently there MUST be both rules and monitoring as per the Marlborough Sounds re wilding conifers. The costs of independent analysis, which will be summarised annually, be at the cost allocation to be decided every 5 years.	Noted	The proposed Rules do not specifically require the destruction of all pest conifers. The cost obligation this would place on occupiers, including those in the Sounds, would be untenable and entirely unreasonable. However, the current proposed Rules do apply in all parts of the Marlborough region. As does the proposed commitment of Council to both provide regional leadership and both monitor and report of the pest conifer programme.
			17i	This report fails to address that in the Marlborough Sounds the pest conifer issue has significant impacts for a variety of reasons. It is obvious that in this area analysis will cost more and that because of same a "citizens science" approach could be an appropriate approach. Many years ago an academic told me that In QCS he had studied the wind currents and was able to decide that the wilding conifers originated from the then plantation in BOMC. Of course other block plantings in Hitaua Bay etc have also had many adverse effects. Such analysis and anticipated costs per group in table (page 21) depends upon the Council records etc and the accuracy of same.	Noted	By way of the fact the proposed programme does not limit its extent (akin to previous frameworks); the proposed programme is essentially 'including' the Marlborough Sounds for the first time. This is an acknowledgement of the issue that does occur in the Marlborough Sounds and really brought to the forefront by the community over the last 10+ years.

			17j	Certainly in the Sounds where so much land is held by DoC a separate way of allocating costs may need to be considered. However the principal of the proposal is supported.	Reject	There are limitations in which costs can be allocated (covered) with a RPMP. The two primary ways are sourcing fund from ratepayers through the Local Government (Rating) Act 2002 and by placing an obligation of occupiers to destroy pests. Given the Crown can only be bound via Good Neighbour Rule, and no other obligation (see sections 5 and 69(5) of the Biosecurity Act 1993). It is suggested that Council continues to seek and secure voluntary investment or additional funding from Crown agencies toward the regional pest conifer programme. The funding secured through the National Wilding Conifer Control Programme is an example of this – noting that while administered under “Vote Primary Industries”, is a joint-agency funding bid across the Ministry for Primary Industries, Department of Conservation and Land Information NZ.
			17k	Programme Monitoring - I believe that in the Sounds such is vital and an annual analysis takes place. However in order to reduce costs in this area of difficult access MDC could enlist the help of the Sounds Advisory Group and the MSRT as they both travel the area fairly regularly and have historic/current knowledge where large groups of wilding conifers exist.	Accept	Given the additional regional leadership and programme monitoring tasks are somewhat new for Council, particularly for the Sounds, it is anticipated that the likes of MSRT and Sounds Advisory Group (among others) will be key partners to work with in this respect.
			17l	Assessment of adverse effects - this should be amended as per the Sounds. As raised previously there are issues re navigational safety which could be addressed under human health and also issues for both fresh and coastal water quality so a “yes" should be in each of those columns for the Sounds.	Noted	The material in Appendix 2 – Assessment of adverse effects is used to solely justify the proposal, and does not appear as part of a potentially amended RPMP. Given the submitter supports the proposal, and is not objecting otherwise based on this assessment, suggest that the submission point is noted.
18	Te Atiawa Manawhenua Ki Te Tau Ihu Trust	Support	18 a	Biosecurity measures such as those found in the proposed changes to the RPMP are a means of expressing kaitiakitanga within the rohe in which Te Ātiawa are mana whenua. Wilding pines, as the proposal outlines, present a significant threat to a range of values of importance to Te Ātiawa. While threats to specific values such as biodiversity and landscape are highly relevant, a more holistic view sits around the ultimate health of *Te Taiao* (the natural world) and its ability to support a healthy indigenous-communities based eco-web. Pest conifers pose a threat to this eco-web and therefore we support the measures outlined in the proposal for their progressive containment.	Noted	

			18 b	There remain two concerns that that will no doubt be duly considered within the operational component of the plan: The use of toxins and their wider impact on non-target native species, ecosystems and waterways;	Noted	It is noted that in all control operations, by agencies or others, any agrichemicals used are regulated by the Environmental Protection Authority, NZ Food Safety and on also local resource management plans. All products being used must registered and controls placed on their use as part of that registration. The application of agrichemicals must also then comply with any local rules outlined in applicable resource management plan(s). These matters are addressed at the operational level.
			18c	There remain two concerns that that will no doubt be duly considered within the operational component of the plan: Aspects of health & safety resulting from dead trees left standing following treatment and hazards arising from falling decayed branches and trunks. This is relevant in areas bordering the coast, and where members of the public may have access.	Noted	It is noted that in all control operations, the safety of workers or other people is considered. As a result, it is common place for some trees to be identified as being higher risk if left to decay standing and they are either left or an alternate method of control chosen. These matters are addressed at the operational level.
			18 d	**Contemporary KAITIAKITANGA in Rohe Management** Founded on Te Ao Māori Directed by Tikanga Acknowledging / respecting the Atua All whakaaro tested against Mātauranga Māori Implemented through Kaitiakitanga Focused on Mauri All mahi to result in *Net Enduring Restorative Outcomes* Mana before Money / Ecology before Economy Heal the People / Heal the Planet **Healthy Planet = Healthy People:** ***Iwi hauora ao hauora*** ***A healthy balanced natural world (which includes the human species), people with a quality sustainable lifestyle, which is underpinned by socio-cultural equity and justice.*** Ko te taumata, ko te taumata, kia toa tatou, kia manawanui *With perseverance may we achieve our visions, ambitions and dreams.*	Noted	
19	The Westervelt Company (NZ) Ltd	Support	19 a	The inclusion of pest conifers as a plant to be manged within the RPMP is supported. Significant adverse effects occur as a consequence of the spread of wilding conifers within the region. These species are spreading rapidly and coordinated intervention is required.	Noted	

			19 b	We support the objective of progressive containment. If this objective is to be achieved the plan needs to provide certainty to stakeholders while demonstrating that an enduring result is possible. The proposed objective sounds good but is neither measurable nor time limited other than being limited to the life of the plan. What does success look like under this plan? The measures seem to rely very heavily on the efforts of stakeholders yet this objective is hardly inspirational. It seems council is reluctant to make statements for which it may be held accountable. This is, however, a plan for the region and needs to be more aspirational to achieve buy in from stakeholders.	Noted	The nature of pest management plans, programme descriptions and objectives are guided by both the provisions in the Biosecurity Act 1993 and more specifically the National Policy Direction for Pest Management. Within these statues, the nature of programme descriptions and objective are required to in effect be realistic and matched to the anticipated level of resourcing (section 74(d) of the Act). The submitter is correct in that the measure proposed does rely heavily on a collaborative approach. This is due to the large issue at hand in Marlborough which for sound reasons, cannot nor should not be solely resolved by a single party. However, with the resources available to a small unitary authority such as Council, the proposed framework and role for Council is a direction that is anticipated to provide a degree of clarity and coordination previously lacking.
			19c	The principle measures indicate how Council will support community led initiatives and among other things ensure that landowners meet their obligations. There is reference to service delivery but while the proposed plan is very specific about landowner obligations it is very generic when it comes to committing council to action. In this regard there are no measures to encourage or support landowners if they were to initiate control action on their land. Council is limited to what it can achieve on its own but it could provide measures that actively support landowners who choose to do something.	Noted	The largest measure within the proposed programme is that of the National Wilding Conifer Control Programme (NWCCP). This is the primary mechanism for action (and service delivery) and for which Council is anticipated, in its role, to continue to be actively involved with. Where the NWCCP operates, it is tenure-neutral and commonly involves landowners and their efforts and/or contributions. Where landowners commit to take action themselves, Council with encourage this to be via a coordinated fashion with surrounding landowners. This is where the likes of community-led Trusts (which Council supports) have a key role.
			19 d	The rules seem to be the chief mechanism for handing over obligations to landowners. I feel it's appropriate to remind ourselves of the origins of these species. In the main they were deliberately introduced to the region by the action of authorities. The trigger for the handover seems to be the completion of a control operation. I am concerned that the measures in rule 5.22.2.1 do not adequately protect landowners.	Noted	What can be difficult to reflect in such a proposed programme is the quantum of work that would occur before any such handover takes place as outlined in Rule 5.22.2.1. This may make the 'handover' obligations seem more at the forefront than what they me in reality.

			19 e	The scale of the high risk pest conifer management area seems to be a double edged sword. On the one hand it removes obligations for landowners to control pest conifers yet on the other it appears a barrier to making any really progress with this issue. I question whether a more localised or granular approach should have been taken to ensure that further spread is prevented. It seems to be too large an area to effectively give up.	Noted	By way of the explanation of the High Risk Pest Conifer Management Area, as proposed it is considered reasonable for occupiers outside of the currently defined area, to destroy high risk species from Table 1. This is given the appearance of these species outside of the proposed High Risk Pest Conifer Management Area is sporadic and at relatively low levels. In terms of inside the defined area, that will be the area where the primary service delivery actions, such as the NWCCP, will be focussed.
			19f	In general the plan sounds fine until you try and work out with certainty what will result from it. Pest conifers are an issue that threaten to change the character of the Marlborough high country for ever. The general tenor of seeking progressive containment sounds great and the large high risk area gives comfort to landowners. The issue is unless there is external funding or inclusion within the National Wilding Conifer Control Programme it is hard to see that anything will occur that makes a difference.	Noted	The submitter identifies key points that will determine the success of the proposed programme, and also factors that places the programme at risk of not achieving the desire objective of Progressive Containment.
20	Williams, Philip Pat	Support	20 a	Must include Council owned/managed land. Example road reserve and foreshore land. Also DOC land.	Reject in part	The extent of the proposed programme, and any applicable obligations as a result of Rules apply to the whole Marlborough region. The only exception, as outlined by sections 5 and 69(5) of the Biosecurity Act 1993, is the Crown can only be bound to the extent of the proposed Good Neighbour Rule 5.22.2.3.
			20 b	Commercial forests to have a post-logging land management plan to include removal/prevention of wild pine infestation within 5 years of logging.	Reject in part	Matters relating to plantation forestry are addressed through regulation such as the National Environmental Standard for Plantation Forestry (NESPF), made under the Resource Management Act 1991. However, any non-planted regeneration of the likes of Radiata pine or Douglas fir would be captured by the definition of ‘wilding conifers’ and be captured by the pest declaration. While no proposed Rules require destruction of these wildings in such cases, Council would have the ability to use administrative powers under Part 6 of the Act to see pests destroyed or direct other action, where Council considers it necessary. For areas of regenerating conifers in an area previously part of a plantation forest, it may be difficult to justify the use of such powers and suggest Council support community-led approaches.

			20c	Council must develop a strong field activity. Owners of land containing wilding pine may not have the expertise required to act upon such instructions as "remove the wilding pine trees".	Noted	Council will need to assess how it delivers the various aspects of the programme it has control over, although this may not extend to creating operational delivery capacity. Notwithstanding the proposed changes, Council is currently able to offer technical advice to those wishing to remove pest conifers or assist in finding a suitable contractor to deliver such works.
21	Wilson, Kevin	Support	21 a	All Marlborough is high risk see below. The review talks about Marlborough as a whole but the map in the review doc excludes Marlborough Sounds. The doc needs to explicitly include Marl Sounds.	Noted	The map (Map 10) referred to by the submitter is solely for the purposes of Rule 5.22.2.2. There is no limitation proposed as to the extent of the RPMP, and proposed pest conifer programme, as a whole. This remains as the entire Marlborough region. Note that while the proposed programme may apply to the whole Marlborough region, and the listed subjects may be captured by the declaration of 'pests', any specific obligation is specified in the proposed Rules. These may not apply everywhere to all people and/or to all occupiers. However, while the Rules may not place an obligation, Council does have the ability to use administrative powers under Part 6 of the Act to see pest destroyed or direct other action, but only where Council considers it necessary.

Appendix 1

Extracts from:

Wilding Conifer Pest Management Plan Rule Development Project. Guidance, and recommended template provisions and narrative for use in wilding conifer pest management programmes within Regional Pest Management Plans throughout New Zealand. Prepared for Ministry for Primary Industries by Tamsin Page.

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Background

The Wilding Conifer Pest Management Plan Rule Development Project (the project) has been initiated as part of the Implementation Programme for the NZ Wilding Conifer Management Strategy 2015-2030[3] (the Strategy).

The development of the Strategy was led by the Ministry for Primary Industries (MPI) in collaboration with a multi-stakeholder working group. The Strategy establishes an agreed Vision for wilding conifer management in New Zealand, and identifies that achieving the Vision will require a multi-faceted approach centred round four principles: individual and collective responsibility, cost-effective and timely action, prioritisation and co-ordination. In relation to each principle, a number of objectives and a range of associated actions have been identified.

The Strategy seeks to address some of the critical issues that have at times hindered progress around wilding conifer management and control. These include clarification of the roles and responsibilities of central government, local government, and land occupiers; and development of a cost-share framework that suggests cost shares for scenarios of different origin or source plantings (legacy plantings, post-RMA plantings, future plantings), and land tenure[4].

This project aims to contribute to actions and objectives under the 'Coordination' principle in the Strategy. Specifically, Objective 4.1 aims to promote a consistent policy approach, and Actions contributing to achievement of this include working collaboratively to develop agreed regional pest management plan rules, and promoting consistent regulation relating to wilding conifer management at the local government level (Actions 4.1a and 4.1c). The project aims to give effect to these Actions.

OBJECTIVE 4.1: Promote consistency in policy across organisations
ACTION 4.1a:
Work collaboratively to develop agreed best practice regional pest management plan rules, or local strategies, which address wilding conifer spread across boundaries without capturing appropriate plantings, that is, investigating new regulatory options such as development of site-led rules.
ACTION 4.1c:
Promote consistency across local government including exploring national policy mechanisms to ensure consistent regulation relating to wilding conifer management.

The project was initiated by MPI and undertaken by an independent contractor working with a multi-stakeholder Working Group consisting of representatives from MPI, LINZ, DOC, Regional Councils, Federated Farmers, and forest owners.

The timing of the project aimed to align with finalisation of the National Policy Direction for Pest Management (the NPD) so that consistent provisions for wilding conifers may be incorporated into Regional Pest Management Plans as they are reviewed in response to the NPD.

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"…The proposed 200m setback is based on consideration of the most common spread characteristics of conifers (wind borne and gravity seed dispersal) and the distance within which the majority of seed dispersal occurs, even though it is possible, under certain conditions, for conifer seed to be dispersed over much greater distances[5] (also see Attachment 1 for further information). In addition, when consideration is given to the various conditions that must be satisfied for a GNR (set out above), these become potentially more difficult to satisfy with a greater setback distance."

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Appendix 1

1. From: Ledgard, N.J. 2004: Wilding conifers – New Zealand history and research background. In Hill, R.I.; Zydenbos, S.M.; Bezar, C.M. (Eds) "Managing wilding conifers in New Zealand – present and future". Proceedings of a workshop held in conjunction with the annual general meeting of the NZ Plant Protection Society in Christchurch on August 11, 2003. ISBN 0-478-10842-7 Published by NZPPS: 1-25

   The major dissemination agent for conifer seed in New Zealand is wind. Field evidence indicates considerable differences between species in the distances seed can be carried. A pilot trial involving eight conifer species, in which the dispersal distance of winged seed was compared after dropping through a fixed-speed airflow, indicated that seed wing loading, or mass unit per wing area, was more closely related to distance of dispersal than seed weight alone (Ledgard, unpublished data)… contorta pine had the lightest seed and seed wing loading, and was dispersed furthest (along with Douglas fir), while ponderosa pine had the heaviest seed.

2. From: Ledgard, N.J. & Langer, E.R. 1999: Wilding Prevention guidelines. ISBN 0-477-02186-7 Published by Forest Research.

   Most wildings grow close to the parent seed source and are termed 'fringe spread'. Wildings further afield are termed 'distant spread'. They grow from seed often sourced from take-off sites and usually occur as scattered outlier trees.

   'Fringe spread' – from 1m to 200m, usually dense (where most seed falls)

3. Wilding Conifer Spread Risk Calculator requires scoring for downwind land management within 200m AND within 200-400m OR if 3 or 4 scored in '3.Siting', score out to 2km.

4. DSS1 Calculating Wilding Spread Risk from New Plantings

   'Long distance spread' – is quite possible if a score of 3 or 4 is scored in '3.Siting', especially if Douglas fir, Larch or Corsican, Contorta, Mountain or Scots pine are involved (all have light seed which is readily dispersed greater distances by wind). In these circumstances the risk of spread

[3] *The right tree in the right place: New Zealand Wilding Conifer Management Strategy 2015-2030*, December 2014
http://www.wildingconifers.org.nz/images/stories/wilding/Articles/2014_new_zealand_wildin200mg_conifer_management_strategy_2.pdf

[4] The cost-share model is set out at p17 of the Strategy, and explained in Appendix II and III of the Strategy.

relative to '4.Grazing' and '5.Vegetation cover' needs to be scored out to beyond the 'fringe' area, to a distance of 2km ('Fringe' infers a distance from seed source of 1-200m).

5. DSS2 Calculating Risk of Wilding Tree Spread Into/Within New Sites

   'Long distance spread' – is likely if a score of 3 or 4 in '3.Siting' is followed by a 2 or greater in '5.Grazing' and '6.Vegetation', especially if Douglas fir, Larch or Corsican, Contorta, Mountain or Scots pine are involved (all have light seed which is readily dispersed greater distances by wind). In these circumstances, the risk of spread may need to be considered out beyond 5km.