

14 December 2018

Via email: pests@orc.govt.nz

Proposed Pest Management Plan
Otago Regional Council
70 Stafford Street
Private Bag 1954
Dunedin 9054

Dear Sir / Madam,

PROPOSED REGIONAL PEST MANAGEMENT PLAN

Thank you for the opportunity to present our submission on the proposed Regional Pest Management Plan and Biosecurity Strategy. We appreciate the huge amount of work that has gone into preparing these documents. The Queenstown Lakes District Council (QLDC) strongly supports the Otago Regional Council's monitoring and enforcement role to achieve positive results for the whole region. We attach a detailed submission to this letter in the spirit of cooperation and collaboration.

We are very pleased that the Otago Regional Council (ORC) will provide regional leadership and support of landscape scale and site-led projects, and we look forward to working closely with you to help achieve our district's pest management goals.

In terms of structure, the summary on the second page of the Pest Management guide document provides concise and clear reference material that we suggest could be included and referenced at the beginning of the Plan; for example, pest classification and a key to what type of management programme will apply to each pest.

Education is an important element to help people understand the Plan's rules, how the rules should be interpreted, and how they will be enforced. The ORC plays a vital role by providing clear information on monitoring, enforcement and penalties, in parallel with educating and incentivising landowners.

Council staff ask to be invited to present this submission verbally at any hearings that result from this consultation. Please note that the submission reflects the position of officers and has not been ratified by Council.

Thank you again for the opportunity to comment.

Yours faithfully,



Mike Theelen
Chief Executive
Queenstown Lakes District Council

1.0 Wilding Conifers

- 1.1 **Organism Declarations:** Contorta pine (page 19) has an asterisk and a sub note '5'. The removal of sub note '5' would mean that rules still apply to this species as a unwanted organism. We suggest that Contorta is classified separately as an unwanted organism so that it cannot be kept in shelter belts or plantations.
- 1.2 **Point 6.3.4 (page 45) Contorta (lodgepole) pine, Corsican pine, Scots pine, Dwarf mountain pine, Mountain pine and Larch:** the last paragraph could reiterate Contorta as an unwanted organism and reiterate the additional rules around this species.
- 1.3 **Page 45: Existing planted conifers in less than one hectare:** Mature shelter belts containing wilding species need to be removed, as they continue to infest and populate land that has been cleared. We propose an addition to the last sentence; that Contorta and other pest plant shelter belts are removed and replaced with non-spreading wilding species within five years of the Plan being adopted. The rationale for this lead-in period is to give landowners time to proactively plan and implement removal of the shelter belts.
- 1.4 **Plan rules 6.3.4.2 and 6.3.4.3:** We note a recommended clearance area of 200m, but point out that Douglas Fir, Larch or Corsican, Contorta, Mountain or Scots pines all have light seed, which can be deposited in wind events well beyond 3 kms. The risk of spread is increased when the neighbouring or downwind vegetation cover is of low stature with no or light grazing.
- 1.5 **Plan rule 6.3.4 (page 46):** We suggest an additional rule regarding existing shelter belts and plantations under one hectare, that the ORC works with landowners to replace or remove the wilding conifers within five years of the Plan becoming operative, where the shelter belt is sited next to vulnerable land.
- 1.6 We propose that the definitions of vulnerable land include:
 - Downwind vegetation cover is:
 - Forest/shrubland/tussock/grassland with few gaps
 - Open forest and/or scattered patches of dense shrubland/tussock/grassland with many gaps
 - Open slips/rockland and/or light, low-stature shrubland/tussock/grassland.
 - Downwind and use – grazing is:
 - Semi-improved grazing (sheep/cattle)/ occasional mob stocking with sheep
 - Extensive grazing only
 - No grazing.
- 1.7 **Objective 6.3.4 (page 46):** We propose an additional new rule for Contorta Pine as an unwanted organism as per the previous Regional Pest Management Plan, i.e. total control in the Lakes district area, and occupiers must destroy all Contorta Pine on their land.
- 1.8 **Plan Rule 6.3.4.1 (page 47):** The rule states that occupiers shall destroy all wilding conifers if (b) the control operations were publically funded (either in full or in part). While this rule is positive for landowners already in the programme, we have concerns it may be perceived as a barrier to entering the programme if a landowner faces ongoing liabilities.
- 1.9 **Plan Rule 6.3.4.2 (page 47):** We believe that complaints should not be restricted to the neighbouring landowner, and that other individuals should be able to report a breach of this rule. We suggest that the rule is amended to say "any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier, agency, or community group involved in wilding control".

- 1.10 **Plan Rule 6.3.4.3 (page 47):** We suggest amending the rule to say “Any action pertaining to non compliance will only be initiated upon a complaint in writing from the adjoining affected occupier, agency, or community group involved in wilding control” for the reasons given above.
- 1.11 **Point 7 Monitoring (page 82) Progressive containment programmes:** We support the spatial reduction of wilding conifers, Contorta, Corsican, Scots, Mountain and Dwarf Mountain pines and/or Larch over the life of the Plan, and propose adding, “that monitoring occurs as a response to new populations that have been recorded” i.e. adding “as appropriate”.
- 1.12 QLDC requests that the ORC consider increasing resourcing for environmental monitoring and compliance regarding wilding conifers across the Otago region. We fully support the Plan’s intent but we are concerned about interpretation, and do not want to see the rules discouraging landowners to enter into pest management programmes.

2.0 Rabbits

- 2.1 We suggest that more resources are dedicated to communicating, informing and educating the community on the the problem of rabbits, and how the Pest Management Plan will respond to rabbit infestations on smaller land parcels.

3.0 Feral goats – Proposed site-led programme

- 3.1 The following paragraphs provide an explanation for the inclusion of a feral goat site-led programme in Queenstown:
- 3.1.1 Feral goats have been present in the Queenstown surrounds for many years. In the past, small control operations have been undertaken to keep numbers down; however the presence of feral goats has rebounded within a short timeframe.
 - 3.1.2 At present, feral goats are widespread throughout the Queenstown fringes and the current populations are high. The feral goats are habituated to the presence of humans, buildings and vehicles, and have been the cause of many hundreds of complaints from the public with regard to the invasion of private land and roads, and their impact on vegetation.
 - 3.1.3 The Gorge Road area is the gateway to Queenstown when approaching from Arthur’s Point. Feral goats are present within the area and found on Queenstown Hill and Ben Lomond Station. The goats wander between the two locations, crossing the road, endangering motorists, and destroying native planting as they go.
 - 3.1.4 There are over 10 properties situated in the Gorge Road area where feral goats reside. The conditions there are ideal and their breeding cycle has increased the population to a number where they are progressively destroying conservation management activities within the Gorge Road area.
 - 3.1.5 The feral goats reside on both sides of the gorge and call out to each other, which results in them crossing the road. The bulk of the population can be found scattered on the western bank of the gorge in the QLDC forest, Department of Conservation land, and Ben Lomond Station.

3.2 The QLDC manages the Gorge Road wetlands (noted as a significant Otago wetland), which provides nesting, foraging and a resting habitat for a range of common and threatened wetland-dependant birds, in addition to a habitat for a range of endemic invertebrates. The wetlands reserve also contains a community garden situated at the northern end. This area is fenced but could potentially be damaged from browsing feral goats. The Ben Lomond Reserve contains many diverse exotic and native species.

3.3 The catchment area has special biodiversity values. An action plan is needed to reduce numbers and protect the environment from the goats' harmful impacts. The following lists the benefits of feral goat control on biodiversity values and the community.

3.3.1 Biodiversity:

- Protecting indigenous flora and fauna and enhancing regeneration:
 - Alpine – kea, rock wren, alpine flora;
 - Tussock grassland and shrub land – plants, lizards, birds, invertebrates
 - Indigenous forest – yellowhead/mohua, bats, kea, rock wren, kakariki, tomtit, brown creeper, rifleman, bellbird, tui, beech;
 - Wetlands – plant species, wetland birds, fish.
- Protecting developed pasture, horticultural land and forest.
- Avoiding accelerated soil erosion and reduced water quality.
- Reducing the spread of agricultural diseases such as footrot and other internal and external parasites.

3.3.2 Community:

- Health and safety;
- Feral goats crossing the gorge and wandering out in front of cars.

3.3.3 The goals of the proposed site-led programme are to reduce and maintain the feral goat population to a level where they do not cause significant environmental damage to the Gorge Road wetland and Ben Lomond Reserve, or significant loss of primary production on land within the catchment area, and do not cause a hazard to road users.

3.4 The following paragraphs list changes to the Plan to accommodate the proposed programme:

3.4.1 **Point 6.5.8 (page 80):** We wish to add the following site-led programme for Ben Lomond, Bowen Peak, Queenstown Hill and Gorge Road (Fernhill to Arthur's Point).

3.4.2 **Addition to point 6.5.2 (page 62):** Site-led programme for Ben Lomond, Bowen Peak, Queenstown Hill and Gorge Road (Fernhill to Arthurs Point).

3.4.3 The objective over the duration of the Plan is to sustainably control feral goats by providing ongoing control to reduce their impact and spread in the areas identified.

3.4.4 The principal measures to be used are: ORC will take a lead role in supporting the formation of a group of stakeholders, landowners and the community to bring about the desired level of environmental protection to the site. Appropriate measures are drawn from the suite of activities listed under collaboration, requirement to act, Council inspection, service delivery, advocacy, and education.

3.4.5 We do not propose introducing occupier control responsibilities at this stage. However, it may become necessary in the future to maintain public investment or where lack of cooperation could jeopardise achieving the objectives. How the ORC intends to deliver

these objectives with the community will be described in a management plan for the area as recommended in the Biodiversity Strategy.

- 3.4.6 The QLDC considered the alternative of relying solely on voluntary action without ORC support. However, this is not considered viable due to the nature of the pest, the size of the area, the effectiveness of voluntary action, and the need for a collaborative inter-agency approach, especially given that the beneficiaries of control action include the wider community.
- 3.4.7 **Proposed change to Plan Rule 6.5.6.1:** The proposed wording is that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Ben Lomond, Bowen Peak, Queenstown Hill, Gorge Road area any a) feral goat. A breach of this rule creates an offence under section 154N(19) of the Act. For the purpose of this rule, places include any building, conveyance, craft, land, or structure.

4.0 Lagarosiphon

- 4.1 **Section 6.5.7 Site-led programme for lagarosiphon management areas:** We support the progressive containment of lagarosiphon in Lake Wanaka and the Kawarau River to reduce its extent over the next 10 years.
- 4.2 **Page 79.** The ORC's support to deliver the objectives with Land Information New Zealand is described more fully in Section 3 of the Proposed Biosecurity Strategy. We suggest the information in the two documents is presented consistently for clarity.
- 4.3 We recommend that the ORC contributes financially to the Lagarosiphon programme in the Kawarau River and monitors Lake Wakatipu, as carried out by the Lake Wakatipu Aquatic Weed Management Group. This contribution will align with other stakeholder contributions and commitments.
- 4.4 We recommend that the ORC contributes financially to the Lagarosiphon programme in Lake Wanaka as carried out by the the Lake Wanaka Lagarosiphon Management Group. This contribution will align with other stakeholder contributions and commitments.
- 4.5 We also propose that the ORC provides financial support to remove the willow waste left in the Kawarau River from historical ORC operations. The willow continues to prohibit complete control of Lagarosiphon in the Kawarau River.
- 4.6 If the ORC is planning to undertake monitoring and surveying of Lagarosiphon, we suggest it directly support the Lake Wakatipu Aquatic Weed Management Group and the Lake Wanaka Lagarosiphon Management so that all parties are working collectively.
- 4.7 **Monitoring site-led programmes (page 82):** The previous Plan included the funding of annual inspections in Lake Wanaka, the Kawarau River, and Lake Wakatipu. The proposed Plan does not mention this funding continuing. We suggest that the ORC continue to contribute to funding the group undertaking the monitoring, which includes:
- known infestations of Lagarosiphon in lakes;
 - water bodies currently free of Lagarosiphon to ensure establishment does not occur;
 - responding to enquiries regarding ponds and aquariums.

5.0 Predator Control

- 5.1 The QLDC supports the work of the Wakatipu Wildlife Trust carried out in the Queenstown Lakes district. We would like to signal that this work may lead to proposing a further site-led programme in the near future.