

# SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE [WWW.FEDFARM.ORG.NZ](http://WWW.FEDFARM.ORG.NZ)



To: Hawkes Bay Regional Council  
Private Bag 6006  
Napier 4142

Submission on: **Proposed Regional Pest Management Strategy 2011.**

Submission by: Hawke's Bay Federated Farmers.

Date: 27 January 2012.

Contact: **BRUCE WILLS**  
HAWKE'S BAY PROVINCIAL PRESIDENT  
Federated Farmers of New Zealand  
P 06 834 9704  
M 027 234 1516  
[bwills@fedfarm.org.nz](mailto:bwills@fedfarm.org.nz)

Address for service: **RHEA DASENT**  
REGIONAL POLICY ADVISOR  
Federated Farmers of New Zealand  
PO Box 715, Wellington 6140  
P 04 470 2173  
F 04 473 1081  
[rdasent@fedfarm.org.nz](mailto:rdasent@fedfarm.org.nz)

**We wish to be heard in support of our submission.**

---

Hawke's Bay Federated Farmers welcomes this chance to submit on the proposed Regional Pest Management Strategy.

Pest and weed control are important to farmers and primary producers. As an organisation we regard pest and weed management as an important component in protecting our land based primary production. Federated Farmer members and other rural stakeholders, inclusive of Maori, are custodians of the land and therefore have a vested interest in protecting our natural resources from unwanted pests and diseases.

## SECTION 2: OBLIGATIONS AND RESPONSIBILITIES

### 1 Provision in the proposed Plan Change:

#### 2.2 *Occupiers*

##### Summary of reasons for this submission:

Hawke's Bay Federated Farmers recognises that occupiers of land are principal beneficiaries of control of pests that have an economic impact.

However the general public also benefit from pest and weed control in that this contributes to greater native biodiversity and the protection of significant indigenous vegetation and habitats as required by the Resource Management Act. This natural heritage is important to the identity of New Zealanders and is globally unique in the high level of endemic species. No one community of people in the region benefits more than the other from biodiversity. Farmers are already significant contributors to biodiversity in that many have areas of native bush on their property. It is well known that pests such as possums can severely impact native bird populations, and can decimate species like the native mistletoe.

The general public also benefit from pest and weed control in that it contributes to a strong agricultural-based regional economy. While Hawke's Bay Federated Farmers agrees that the primary beneficiaries of the proposed strategy are farmers and producers/processors of beef, dairy and deer the fact that New Zealand as a whole relies heavily on agricultural exports must not be forgotten.

Table 8 on page 60 of the Regional Pest Management Strategy acknowledges that the regional community at large are beneficiaries of greater indigenous biodiversity as a result of pest and weed control. Farmers already contribute to pest management through their levies to fund Animal Health Board activities, rates to local government activities and taxes to central government organisations and activities.

The requirements of the Strategy to control plant pests must not conflict with district plan provisions around disturbance of indigenous vegetation. The Central Hawkes Bay District Plan states in Standard 4.9.13 that there should be no modification to any "Site of Significant Conservation Value." A "Site of Significant Conservation Value" can include any area of woody indigenous vegetation containing tree species of at least 30 cms diameter and is over 1ha with a canopy height of 6m, or over 5ha of any canopy height. In the quest to control plant pests such as gorse in accordance with the Regional Pest Management Strategy, land occupiers could be in breach of the CHB district plan. While Standard 4.9.13 excludes "minor works" there is no specific mention of works that are required by the Pest Management Strategy. The Hastings District Plan specifically excludes activities carried out under the Regional Pest Management Strategy from the definition of "Indigenous Vegetation Modification" so it remains permitted.

Where pest and weed control is the responsibility of the occupier, the level of knowledge, techniques and equipment required should not be too specialised. This may result in low motivation or poorly executed management. If specialist expertise or equipment is required, then the Council

needs to provide this. Hawke's Bay Federated Farmers supports the Possum Control Area programme that the Council already has in place in partnership with occupiers; this is a great example of shared management responsibilities and occupier support by Council.

Education is a valuable tool for the spread of information around occupier responsible management. The pamphlets that the Council publish regarding the individual species provide some education opportunities. Lifestyle block owners may need targeted education about their pest and weed control responsibilities as they have previously lived in urban areas where pests and weeds are less apparent on small urban properties.

Relief Sought:

- That the general public are also acknowledged to benefit from pest and weed control, in that control contributes to a strong regional economy and increased indigenous biodiversity.
- That the Regional Pest Management Strategy is not in conflict with district plan rules regarding indigenous vegetation disturbance.
- That pest and weed control that is the responsibility of the occupier only requires a level of knowledge and equipment that is manageable to non-specialist people. Where expertise or special equipment is needed that this is available from the Council.
- That education about pest and weed control is undertaken by the Council, and information is freely available to occupiers.

2 Provision in the proposed Plan Change:

2.3 *Crown Land Occupiers*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers acknowledges the under the current legislative framework the Crown is not required to contribute financially to the strategy via rates, however, Federated Farmers advocates that the Crown should contribute on the same basis as any other landowner within the Region. Although funding from the Department of Conservation can be secured only by the extent to which they agree we believe that this level of funding is still grossly disproportionate to the benefits they receive from the strategy.

Hawke's Bay Federated Farmers considers that the Council should not fund pest and weed control on Crown owned land, as this should be utilised for pest and weed management on ratepayers' land.

Federated Farmers submitted to the Biosecurity Law Reform Bill in February 2011, and advocated that the Crown making an equitable contribution to pest control. On this matter Federated Farmers submits that the Bill should be unequivocal in requiring the Crown to be bound by the (Biosecurity) Act to the same extent as every other individual, group or industry. Federated Farmers also advocated for a change in the Bill that provide additional powers for councils to collect rates from crown land for pest management work. The region needs to pay a percentage for the work carried

out in that region but often that work can be for Crown land which the council cannot collect rates for meaning that ratepayers are subsidising the Crown.

It is unclear in the Regional Pest Management Strategy if the Department of Conservation (DoC) has to be a good neighbour and abide by a pest management plan, as the strategy just notes that a programme of work has to be negotiated. Hawke's Bay Federated Farmers questions whether the Department of Conservation will be required to carry out pest control, or will the Council carry out the work and then subsequently bill the Department.

Relief Sought:

- That the Council continues to strive to obtain greater levels of funding from the Crown in order to be more reflective to the benefits they receive from the Strategy.
- That Crown land occupiers are required to carry out pest and weed control in compliance with the Regional Pest Management Strategy.

3 Provision in the proposed Plan Change:

2.4 *Control of Roadside Plant Pests*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers supports the provision in the strategy which requires all occupiers including territorial authorities and the NZ Transport Agency to be responsible for pest and weed control along roads and roadsides.

A particular concern of farmers is the spread of weeds via machinery and gravel used by councils to maintain roads. Seeds can become stuck on machines and vehicles, and spread when the machines are taken to be used at a different location and re-infest new areas. Gravel that is extracted from riverbeds and has seeds or roots may be transported and used to maintain roads, and spread the weed species into new areas. A screening system should be in place to prevent the spread of weeds this way.

Relief Sought:

- That occupiers of roads and roadsides are required to carry out pest and weed control in compliance with the Regional Pest Management Strategy.

4 Provision in the proposed Plan Change:

*Section 2.5 Territorial Authorities*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers supports the requirement of territorial authorities to comply with the Strategy and to manage pests and weeds on their land. Land owned by territorial authorities must not act as a safe harbour of pests and weeds which can re-infest private land, undoing all the control and eradication work of neighbouring occupiers. As pests and weeds do not respect boundaries every land occupier has an equal part to play.

Relief Sought:

- That territorial authorities are required to carry out pest and weed control in compliance with the Regional Pest Management Strategy.

**SECTION 3: PESTS TO BE MANAGED**

5 Provision in the proposed Plan Change:

*3.3.2 Site-specific Control*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers supports the provision that Council will provide a level of assistance to land occupiers that wish to control pests at specific sites that are regionally significant for biodiversity.

Specific sites need to be identified with landowner/occupier consultation, as sustaining biodiversity relies on the goodwill, co-operation and individual commitment of landowners and land managers. Many land occupiers take pride in their proximity to significant biodiversity and their contributions to its high value needs to be encouraged and acknowledged by Council. Hawkes Bay Federated Farmers supports this spirit of partnership between occupiers and Council, and its voluntary basis.

Relief Sought:

- That Council provides a level of assistance to land occupiers that volunteer to control pests at specific sites.
- That specific sites are identified in consultation with land owners/occupiers.

6 Provision in the proposed Plan Change:

3.5 *Offences and Rules*

Summary of reasons for this submission:

Federated Farmers submitted in support of the rules outlined within the Penalties sections on the Biosecurity Law Reform Bill, inclusive of the level of fines. It is important to have strong penalties available as a means of ensuring those who choose to flout biosecurity clearance instructions and rules are effectively prosecuted.

Hawke's Bay Federated Farmers supports the provisions for offences and rules in the Regional Pest Management Strategy.

Relief Sought:

- That appropriate rules and penalties are provided for in the Regional Pest Management Strategy.

**SECTION 4: TOTAL CONTROL (SERVICE DELIVERY) PLANT PESTS**

7 Provision in the proposed Plan Change:

4.1 *African Feather Grass*

4.2 *Goats Rue*

4.3 *Nassella Tussock*

4.4 *Phragmites*

4.5 *Privet*

4.6 *Spiny Emex*

4.7 *White Edged Nightshade*

4.8 *Yellow Water Lily*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers is generally supportive of the total control (service delivery) regimes.

We support the control of Privet in the Region as we believe it has significant health implications for our members and their families.

Goats Rue is noted to be present along roadsides and railways. It is imperative that the Crown land occupiers of the railway and roadsides contribute financially, seeing that they are receiving a total control service delivery from the Council. Otherwise ratepayers are subsidising weed control work on Crown land.

Yellow Water Lilly and Phragmites as Total Control (Service Delivery) species is appropriate, as occupiers would be reluctant to use chemicals to control weeds that are in or near waterways and subject to water quality restrictions.

Relief Sought:

- That African Feather Grass, Nassella Tussock, Phragmites, Privet, Spiny Emex, White Edged Nightshade and Yellow Water Lily are total control (service delivery) plant pests.
- That the Crown contributes to the service delivery control of Goats Rue.

**SECTION 5: TOTAL CONTROL (OCCUPIER RESPONSIBILITY) PLANT PESTS**

8 Provision in the proposed Plan Change:

5.1 *Apple of Sodom*

5.2 *Australian Sedge*

5.3 *Chilean Needle Grass*

5.4 *Cotton Thistle*

5.5 *Japanese Honeysuckle*

5.6 *Pinus Contorta*

5.8 *Old Man's Beard*

5.9 *Saffron Thistle*

5.10 *Woolly Nightshade*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers is generally supportive of the management regimes, and supports the incentive schemes to meet up to 50% of the cost of an approved control programme.

However the defined control area for Japanese Honeysuckle around Lake Tutira needs to be identified in consultation with land owners/occupiers to ensure that everyone is well informed of where the honeysuckle is located and their respective responsibilities under the Strategy.

Relief Sought:

- That Apple of Sodom, Australian Sedge, Chilean Needle Grass, Cotton Thistle, Japanese Honeysuckle, Pinus Contorta, Old Man's Beard, Saffron Thistle and Woolly Nightshade are total control species.
- That Council continues the incentive scheme to meet 50% of the cost of an approved control programme.
- The defined control area for Japanese Honeysuckle around Lake Tutira is identified in consultation with land owners/occupiers.

## **SECTION 6: BOUNDARY CONTROL PLANT PESTS**

### 9 Provision in the proposed Plan Change:

- 6.1 *Bathurst Bur*
- 6.2 *Blackberry*
- 6.3 *Gorse*
- 6.4 *Nodding Thistle*
- 6.5 *Ragwort*
- 6.6 *Variegated Thistle*

#### Summary of reasons for this submission:

Hawke's Bay Federated Farmers is generally supportive of the regime, however the seeds of the Nodding Thistle and Ragwort can travel considerable distances so a total clearance rule may be more appropriate.

Dow AgroScience advises that Ragwort seeds may remain viable for over 10 years, and individual plants can produce from 30,000 to 150,000 seeds.

The pamphlets in the "Environmental Topics" series on specific plant pests are a great resource and provide good information on how to control each weed.

#### Relief Sought:

- That Bathurst Bur, Blackberry, Gorse, and Variegated Thistle are boundary control species.
- That the Council considers Nodding Thistle and Ragwort as total control species.

## **SECTION 8: REGIONAL CONTROL ANIMALS**

### 10 Provision in the proposed Plan Change:

- 8.1 *Possums*
- 8.2 *Feral Rabbits*
- 8.3 *Rooks*

#### Summary of reasons for this submission:

Hawke's Bay Federated Farmers is generally supportive of the pest control regimes.

The Possum Control Areas scheme in particular is well supported and Hawke's Bay Federated Farmers congratulates the Council on the Council/land occupier partnership, and the great results.

Where the Department of Conservation is a beneficiary of the initial Council possum control work then it needs to contribute to the funding of this work. Federated Farmers supports the Council in its

intention to recover costs from the Department. We stand alongside the Council in this issue and we have a long history of advocacy to Central Government.

Hawke's Bay Federated Farmers commends the Council on the extra assistance provided for occupiers of covenanted areas within a PCA.

Enforcement needs to be treated carefully, as possum numbers can rise to over 5% residual catch rate despite the best efforts of the occupier. To retain the goodwill and partnership spirit of the PCA scheme, enforcement needs to be appropriate for the situation.

Hawke's Bay Federated Farmers encourages the Council to consult directly with land owners/occupiers where rabbit prone areas are identified. This will ensure that information is correct and that everyone is aware of their responsibilities under the Strategy.

Relief Sought:

- That Possums, Rabbits and Rooks are Regional Control Pests.
- That the Crown contributes to the service delivery control of possums.
- That land owners and occupiers within rabbit prone areas are directly consulted with.

**SECTION 9: SITE SPECIFIC CONTROL ANIMALS**

11 Provision in the proposed Plan Change:

*Site Specific Control Animals*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers is generally supportive of the management regime. Support is given for the methods of a subsidy scheme, education, research and control.

Specific sites for animal control need to be identified with landowner/occupier consultation, as sustaining biodiversity relies on the goodwill, co-operation and individual commitment of landowners and land managers. Consultation will ensure that information is correct and that everyone is aware of their responsibilities. Occupiers will be more willing to carry out their responsibilities if their needs have been taken into account.

The subsidy scheme is commended. Many land owners/occupiers are proud of biodiversity on their land, and the subsidy for 50% of pest control costs is a great way of acknowledging their stewardship ethic and encouraging further active management.

Education is an important tool. As people gain more accurate knowledge about pests and their impacts in the region, misconceptions will reduce and people will be more willing to proactively

engage. On-going Research will gain more accurate information which can then be used in education.

Relief Sought:

- That Site specific control is identified in consultation with land owners/occupiers.
- That the subsidy scheme for up to 50% of pest control costs is retained.
- That education and research is undertaken.

**SECTION 11: REGULATORY MANAGEMENT**

12 Provision in the proposed Plan Change:

*11.2 Enforcement procedures*

Summary of reasons for this submission:

Hawke's Bay Federated Farmers generally supports the enforcement regime, and the clearly defined procedure for enforcement action. The escalating scale of enforcement procedure is appropriate.

It is important to have effective enforcement procedures as a means of ensuring those who choose to flout pest and weed control and rules are effectively prosecuted. Hawke's Bay Federated Farmers does not want to see the hard work from the majority to be undone by the few.

The exemption provisions provide an opportunity for non-compliance to be treated on a case-by-case basis as appropriate. Non-compliance may have occurred through genuine hardship or extenuating factors.

Relief Sought:

- That enforcement procedure is managed on an escalating scale of non-compliance.
- That exemption provisions are retained so non-compliance can be managed on a case-by-case basis.

## SECTION 12: FUNDING OF THE PEST MANAGEMENT STRATEGY

### 13 Provision in the proposed Plan Change:

#### *12.2. Pest Management Strategy Costs*

##### Summary of reasons for this submission:

Federated Farmers is very supportive of the Council incentive scheme which provides land occupiers with up to 50% and up to \$3,000 of the cost of control. This recognises the time and effort that individual land occupiers put into pest and weed control, for a collective benefit.

It is understood that the funding of the Proposed Regional Pest Management Strategy will be contained in the Annual Plan. Hawke's Bay Federated Farmers recognises that Council has the option of putting funding provisions in the Annual Plan. We have concerns that the consultation on the Regional Pest Management strategy began before the Annual Plan was released because it makes it difficult for submitters to read the two documents concurrently and make informed decisions. In addition, we are concerned that the Annual Plan is reviewed each year and therefore has the potential for costs to be changed dramatically within a short space of time.

##### Relief Sought:

- That the incentive scheme continues to contribute to land occupiers up to 50% of the cost of their control activities.
- That more certainty is provided around the costs and revenue of the Pest Management Strategy.

### 14 Provision in the proposed Plan Change:

#### *Section 12.4 Plant Pest Costs*

##### Summary of reasons for this submission:

Hawke's Bay Federated Farmers notes that while occupiers of properties less than 4ha are acknowledged to receive 25% benefit; they do not contribute to the targeted rate. Pests and weeds aren't confined only to farms and do not respect boundaries. Lifestyle properties can be significant exacerbators as occupiers may not have knowledge or incentive to carry out pest and weed control, and may not manage their pasture as a farmer would. Urban properties will receive service delivery by Council to control privet which is present in home gardens. This is one example of where smaller properties are exacerbators by planting privets as a garden shrub, as well as receiving the benefit of Council control activities. Small properties should contribute to the funding of pest and weed control activities.

While Hawke's Bay Federated Farmers sees that charging \$0.365 per hectare will yield less than \$1.50 from properties <4ha is uneconomic, this could be solved by changing the rating mechanism. Instead of a cents-per-hectare rate, a flat charge per property could be applied. This will mean that

smaller properties are contributing to control as both beneficiaries and exacerbators, while ensuring that the amount of revenue collected remains economic for Council.

Relief Sought:

- That properties <4ha contribute to the targeted rate by using a flat fee per property rating mechanism.

---

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that resource management and local government decisions impact on our member's daily lives as farmers and members of local communities.

---

Hawke's Bay Federated Farmers thanks the Regional Council for considering our submission to the Regional Pest Management Strategy.

