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Tēnā koutou

**Report of the Parliamentary Commissioner for the Environment, Te Kaitiaki
Taiao a Te Whare Pāremata: Space invaders: A review of how New Zealand
manages weeds that threaten native ecosystems**

Canterbury Regional Council (Environment Canterbury) welcomes the opportunity to provide comment to the Environment Committee and the Primary Production Committee on the report and recommendations of the Parliamentary Commissioner for the Environment (PCE). Please find Environment Canterbury's submission attached.

Environment Canterbury support the main theme of the recommendations, that the system needs to be strengthened to better manage weeds that threaten native ecosystems.

We look forward to ongoing involvement as part of the review of the report and its recommendations.

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Yours sincerely



Jenny Hughey
Chair
Te Kaunihera Taiao ki Waitaha

Encl: Environment Canterbury Submission on the Report of the Parliamentary Commissioner for the Environment, Te Kaitiaki Taiao a Te Whare Pāremata: Space invaders: A review of how New Zealand manages weeds that threaten native ecosystems

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Environment Canterbury submission on the report of the Parliamentary Commissioner for the Environment, Te Kaitiaki Taiao a Te Whare Pāremata: Space invaders: A review of how New Zealand manages weeds that threaten native ecosystems

Introduction

1. Canterbury Regional Council ('Environment Canterbury', 'the Council') welcomes the opportunity to comment on the report and recommendations of the Parliamentary Commissioner for the Environment (PCE) and thanks the Environment Committee and the Primary Production Committee ('the Committees') for inviting this submission.
2. This submission is presented in relation to Environment Canterbury's roles, functions, and responsibilities under the Biosecurity Act 1993 (Biosecurity Act) and the Resource Management Act 1991 (RMA).
3. This submission provides general comments and responds to the recommendations set out in the PCE report.
4. Environment Canterbury has an important role in providing regional leadership to act early to protect indigenous biodiversity, economic production and mahinga kai from harm caused by pests and other invasive organisms.
5. Environment Canterbury also has a function under the RMA to maintain biodiversity in the Canterbury region.
6. Please note that while the recommendation headings structuring this submission have been abridged for brevity, the submission comments address the full scope of the recommendations in the report.

General Comments

7. Environment Canterbury acknowledge the valuable work undertaken by the PCE in reviewing the way in which weeds threatening native ecosystems are managed.
8. The Council supports the main theme of the recommendations, that the system needs to be strengthened to better manage weeds that threaten native ecosystems.
9. Environment Canterbury agrees with the report's observation that support and guidance in adopting a stronger te ao Māori approach to managing native ecosystem weeds would be very beneficial as part of a transparent decision-making process.

National direction and leadership

10. Environment Canterbury supports aligning the priorities for native ecosystem weeds across agencies. Working together across agencies can lead to better, aligned outcomes and reduce leadership gaps.
11. We acknowledge that deploying the native ecosystem focus of an agency like the Department of Conservation (DOC) or the Ministry for the Environment (MfE) alongside the processes and tools of Biosecurity New Zealand could have strategic benefit.
12. We encourage the Committees to carefully consider whether a single or joint agency leadership model is appropriate (considering goals around alignment, resource allocation and the streamlined and efficient delivery of outcomes). Whichever leadership model is chosen, role clarity will be critical.
13. We hold some concerns about effectiveness and efficiency issues of a joint agency leadership model when native ecosystem weeds are the intended focus. A joint management response may not result in the best deployment of resources and could continue to perpetuate a historical focus on production pests. We also note the potential for unnecessary process duplication or unclear ownership of goals and actions.
14. The Council also seeks that the Committees consider leadership implications associated with agencies that would have subsequent responsibility to deliver self-defined priorities. Accountability and transparency is needed to ensure that both the leadership and the delivery is effective, and that strong priority setting is not impacted by the ability to deliver.
15. Environment Canterbury strongly supports an approach that clearly identifies the priorities and roles of Crown agencies in managing native ecosystem weeds on the lands they administer, including land administered by Land Information New Zealand (LINZ) (including lakes, riverbeds and pastoral lease lands) and public conservation land administered by DOC.
16. The Council also notes that an overhaul of the Biosecurity Act 1993 is currently underway and that this process should consider the recommendations of the PCE. We recommend that the Environment Committee and Primary Production Committee consider the PCE report in concert with the overhaul of the Biosecurity Act and not as a separate process.

Resourcing and priorities

17. The Council agrees with the PCE report where it notes that the history of New Zealand's biosecurity interventions have stemmed from the need to manage production pests, and that this legacy remains evident in the current system, including funding and priorities. The report notes that this has meant that managing native ecosystem weeds has often been over-looked and under-resourced.

18. Actioning the PCE recommendations will require a focus on implementation, including sufficiently funding and resourcing all agencies involved. A long-term approach to implementation and funding is needed to ensure ongoing success, and this applies to all agencies and organisations with a role in managing native ecosystem weeds, including central and local government, community groups and landowners.
19. The balance of private landowner and central government responsibility and funding requires careful consideration. Rural landowners in Canterbury are undertaking significant control of production pests, as well as weeds and pests which impact their native stands of vegetation.
20. While not directly related to the native ecosystem weed focus of the PCE's report, it is also important to consider resourcing challenges across the whole spectrum of biodiversity pests. The Council also considers native ecosystem animal pest control to be under-resourced, despite this attracting greater political priority than weeds that threaten native ecosystems. For example, browsing from animals can cause significant impacts to regenerating native ecosystems, while predators continue to impact native biodiversity. Resourcing for biodiversity pests needs to be considered as a whole, and resourcing for native ecosystem weeds should occur in addition to, not at the expense of, other critical pest control work.

Response to recommendations

Recommendation 1: The Minister for Biosecurity and the Minister of Conservation should provide clearer direction on the priority to be accorded to managing native ecosystem weeds that are already present in New Zealand

21. Environment Canterbury agrees with the need to provide clear national direction on the priority to be accorded to managing native ecosystem weeds already present in New Zealand.
22. We agree with the observation that animal pests (and in particular, predators) that threaten native ecosystems have attracted greater political priority to date, compared to native ecosystem plant pests or weeds. We agree that this priority should be extended to native ecosystem weeds, which pose significant threats to native ecosystems (both new/emerging weeds and weeds that are already established in New Zealand).
23. Our comments regarding which agencies should provide this direction are covered in paragraphs 10-15.
24. National direction prioritising the management of native ecosystem weeds needs to have a clearly stated purpose. We propose that this purpose should be to support overarching national goals for native ecosystems, as articulated in Te Mana o Te Taiao/Aotearoa New Zealand Biodiversity Strategy.

Recommendation 2: The Director-General of the Ministry for Primary Industries (Biosecurity New Zealand) and the Director-General of the Department of Conservation should jointly provide leadership for managing native ecosystem weeds that are already present in New Zealand

25. Environment Canterbury supports stronger leadership from the appropriate central government agency or agencies for managing native ecosystem weeds already present in New Zealand. This will be particularly important for ensuring sufficient funding and resourcing is allocated to native ecosystem weed management.
26. Environment Canterbury encourages the Committees to closely consider the roles of agencies in managing native ecosystem weeds. Historically, significant effort and resource has been invested in managing pests (including weeds) that impact on primary production, with less priority accorded to native ecosystem weeds. Noting that managing production weeds will continue to be a critical part of New Zealand's biosecurity response, we encourage the Committees to consider the leadership model, in particular:
 - a. whether a separation of leadership between production weeds (by MPI) and native ecosystem weeds (by DOC and/or MfE) might deliver better outcomes for native ecosystems, while continuing to support management of production weeds (and other pests)
 - b. whether a single or joint agency leadership model is more appropriate (considering the goals of alignment, resource allocation and the streamlined and efficient delivery of outcomes).
27. We support a management approach that sets clear direction, plans strategically and ensures an appropriate allocation of resources between both production weeds and native ecosystem weeds.
28. We note that management of native ecosystem weeds must occur across all land tenures (include land owned and/or administered by the Crown).

Recommendation 3: In exercising that leadership, the two Director-Generals should require MPI and DOC officials to jointly develop (in collaboration with representatives from regional councils) national policy direction on native ecosystem weeds

29. Environment Canterbury supports the recommendation to develop national policy direction specific to the management of native ecosystem weeds, to apply across all land tenures. We support involvement of regional councils in developing this policy direction.
30. We note that, even when a weed has adverse effects on both primary production and native ecosystems, policy direction for managing a weed in native ecosystems will (and should) likely differ from that in the productive landscape context. As alluded to earlier,

how this would be handled under any joint agency approach (including any potential conflicts in agency priorities and policy approaches) needs to be considered carefully.

31. Under the current system, regional councils can be frustrated by limited responsibilities of the Crown to manage pests in regional pest management plans. Roles and responsibilities of all stakeholders must be considered to ensure that the management of native ecosystem weeds is comprehensive and effective.

Recommendation 4: National policy direction specifically directed to native ecosystem weeds should be provided by either rewriting the National Policy Direction for Pest Management or amending section 56 of the Biosecurity Act.

32. Environment Canterbury supports the need to amend current legislation and/or the existing National Policy Direction for Pest Management ('the NPD') to enable effective management of ecosystem weeds.
33. However, to achieve real change in the way native ecosystem weeds are managed in New Zealand, the Biosecurity Act is likely to require significant changes, especially to Sections 70 to 75 of the Act and in particular to the cost benefit analysis process that is used to assess organisms for inclusion in pest management plans. The current requirements tend to favour inclusion of pests that threaten economic values and can preclude many native ecosystem weeds from inclusion, other than at limited sites (through 'site-led' pest programmes).
34. Any pest management plan developed under the Biosecurity Act must comply with both the NPD and the Act itself. Therefore, changing or developing a new NPD alone may not be enough to address the underlying reasons why native ecosystem weeds often fail tests for inclusion in and management under regional pest management plans.

Recommendation 5: Any national policy direction that includes policy on native ecosystem weeds should require engagement with iwi and hapū and provide clear direction on national priority weeds, the management of emerging weeds, and specify national and regional implementation and funding roles

35. Environment Canterbury supports the recommended minimum content for new national policy direction on native ecosystem weeds and agrees that this policy direction should require engagement with mana whenua.
36. We support the requirements to identify national priority weeds, using relevant expertise and a robust and transparent process. There are complexities to prioritising native ecosystem weeds. Prioritisation needs to allow for both 'weed-led' prioritisation of emerging threats ('Which species pose the greatest risk to native ecosystems?') and 'ecosystem-led' or 'site-led' prioritisation to protect prioritised ecosystems and/or biodiversity sites from weeds ('Which ecosystems and sites are at greatest risk from weeds? What mix of weeds are they threatened by?').

37. Prioritisation should consider:

- a. The current position of a weed on its 'invasion curve', with priority accorded to:
 - i. intervening when weeds are at the earliest stage of occurrence and pose a risk of severe impacts on native ecosystems if they were to become widely established
 - ii. preventing high-risk weeds that are in some regions or parts of regions from spreading more widely.
- b. Protection of prioritised ecosystems (for example, Naturally Uncommon Ecosystems identified as 'at risk') and biodiversity sites from native ecosystem weeds, with consideration given to:
 - i. the potential impacts of weeds on the native ecosystems, habitats and species in question, including how transformative the weeds are (e.g., through nitrogen fixation, fire promotion)
 - ii. risks associated with weed control (e.g., by-kill)
 - iii. weed biology (e.g., shade tolerance, mechanisms of spread)
 - iv. feasibility of weed control or management.
- c. The importance of local context, noting that:
 - i. some species may be considered low risk nationally but pose a significant threat locally
 - ii. the same species may or may not be a serious native ecosystem weed, depending on the ecosystem in question. (For example, gorse and broom are considered serious weed threats in braided river environments and other non-forest ecosystems, but do not pose the same threat in forest/forest successional ecosystems).

38. Any national policy direction on native ecosystem weeds should also include:

- a. direction on which, where, and when exotic plant species are not 'native ecosystem weeds', and where or when they should not be controlled (that is, where control does not deliver benefits for native ecosystems)
- b. requirement to regularly review and update the national priority weeds list
- c. surveillance priorities and guidelines
- d. guidelines for reporting on surveillance efforts, including where results are stored and how they will be made accessible to the public.

39. National policy direction should be supported by guidance on appropriate weed control methods that minimise impacts on vulnerable ecosystems, while also avoiding introducing undue barriers to landowners, community groups, councils or others from undertaking the native ecosystem weed control that the policy direction intends to promote.

40. Careful consideration needs to be given to how the policy direction will be implemented and by whom, and where the costs of implementation will lie (including consideration of costs to landowners, who contribute significantly to weed management through action on their own land).

Recommendation 6: The Ministry for Primary Industries should work with the Department of Conservation, Ministry of Business, Innovation and Employment, regional councils and relevant Crown Research Institutes to develop, administer and maintain a single authoritative and publicly accessible database of all exotic plants in New Zealand

41. Environment Canterbury supports the development, administration and maintenance of a single authoritative and publicly accessible database of all exotic plants in New Zealand.
42. Understanding the occurrence and distribution of native ecosystem weeds is critical for making informed weed surveillance and management decisions. A national exotic plants database, as described in the report, is urgently needed and would enable weed management resources to be used more efficiently and effectively.
43. A functional and effective national database will rely on sharing of information between central government agencies, councils and other organisations involved in managing native ecosystems weeds. This will require addressing existing barriers to information sharing, including between councils.
44. Further thought needs to be given to which agencies are best positioned to lead development, administration and maintenance of a national exotic plants database. We suggest considering the potential for DOC, LINZ or Manaaki Whenua Landcare Research to having a leadership role, given the focus of and expertise within these agencies. Note Manaaki Whenua Landcare Research is already a national custodian for several plant databases.
45. We have also identified several considerations that we believe will materially impact on the success of an exotic plant database.
 - a. Privacy issues: There are likely to be concerns from landowners around publicly accessibility of information about weeds on private land. Privacy concerns will need to be managed in a way that respects individual privacy rights while retaining the utility of the database for weed management purposes.
 - b. Resourcing: The exotic plants database, and any other existing databases it draws from, will need sufficient funding to guarantee ongoing maintenance, coordination and accessibility of data. We note that many existing databases are poorly funded and maintained. We support ongoing central government commitment to investing in and maintaining an exotic plants database.
 - c. Ownership: The database needs to have a clear owner.

- d. Global relevance: We agree with the report's statement that New Zealand's information system for exotic plant species needs to link with major global online resources.

Recommendation 7: The Ministry for Primary Industries, Department of Conservation and regional councils, working with iwi and hapū and other relevant organisations, should set up an 'emerging risks team' to scan for and coordinate management of newly emerging native ecosystem weeds

- 46. Environment Canterbury supports the recommendation to establish an 'emerging risks team'. Currently, new weed populations are often detected when they are beyond the point of being easily eradicated. We support the team consisting of representatives across central government agencies, regional councils and unitary authorities, experts and mana whenua.
- 47. A national 'emerging risks team' would provide a valuable, proactive mechanism for identifying and responding to high-risk native ecosystem weeds before they become widespread, protecting native ecosystems and saving significant resource.
- 48. This approach may help compensate for the current limitations of the Biosecurity Act, which can make it difficult for regional councils to respond quickly to new threats. Regional pest management plans developed under the Biosecurity Act have limited ability to react quickly to new weed threats, where they have not been previously identified in the plan.
- 49. Environment Canterbury has also recognised the need for a similar resource or 'team', and has begun developing this capability at a regional level.
- 50. We note the following considerations to further support an effective national 'emerging risks team':
 - a. Ownership: The 'emerging risks team' should be established by the same agency or joint agencies that are leading native ecosystem weed management nationally.
 - b. Reporting: The 'emerging risks team' should undertake regular reporting, and results should be publicly accessible.
 - c. Implementation: We recommend that the 'emerging risks team' employs a range of surveillance methods (including passive and active surveillance) and develops and implements a process for rapidly responding to new detections.
 - d. Local input: We note the potential benefits of including local knowledge in the national 'emerging risks team' or as part of regional delivery and implementation. This may require funding to enable involvement of community members and mana whenua.