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2 June 2022

Clerk of the Environment Committee  
Environment Committee and the Primary Production Committee  
[en@parliament.govt.nz](mailto:en@parliament.govt.nz)

Dear Sir/Madam

**Submission on 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”**

Thank you for the opportunity to provide comment on the discussion document regarding the review of how New Zealand manages weeds that threaten native ecosystems.

Please find the West Coast Regional Council's (WCRC or the Council) feedback attached. Council consulted with its iwi partners, Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu or PNT), who are mana whenua on the West Coast/Tai Poutini, in the development of this submission.

We welcome the opportunity to respond to this consultation.  
Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our submission.

Yours faithfully

Rachel Vaughan on behalf of  
Heather Mabin  
**Chief Executive Officer**

## **West Coast Regional Council Submission on “Space invaders: A review of how New Zealand manages weeds that threaten native ecosystems”**

### **List of Feedback**

#### **Feedback 1**

Any leadership should be accompanied by the appropriate level of resourcing. Funding needs to be provided to support weed control, especially when the sources of uncontrolled weeds are not on private or locally managed land.

#### **Feedback 2**

Whatever policy direction is developed to give national directives, the WCRC supports:

- a) Working with regional councils to define what national priority weeds should be addressed by the region;
- b) Providing clear direction on the management of emerging weeds, including a requirement for regular, coordinated scanning and surveillance by Government Departments on Crown land;
- c) Appropriate funding support for any additional WCRC scanning and surveillance required for private land;
- d) Specifying roles to define what is to be done nationally, including any financial contributions by central government, and what is to be done regionally.

#### **Feedback 3**

Council does not support including a requirement for regular, coordinated scanning and surveillance of pest plants by regional councils, beyond what is already undertaking to deliver legislative functions under the Biosecurity Act, without additional support and resources.

#### **Feedback 4**

WCRC supports MPI and DOC officials working with regional councils to define what national priority weeds should be addressed by the region. WCRC believe that the Crown and DOC should be better resourced to address native ecosystem weeds on their own land.

#### **Feedback 5**

WCRC supports Recommendation 5 but seeks that Recommendation 5 includes:

- a) A provision that a national approach would account for specific risks to local Communities from different weed species;

- b) Crown entities are better resourced to control weeds on their properties;**
- c) Regional scanning and surveillance to be resourced by central government;**
- d) Iwi and hapu are appropriately resourced to contribute to national policy direction on scanning and surveillance;**
- e) Training schemes are established to ensure rangitahi are appropriately trained and resourced to contribute to the national approach.**

#### **Feedback 6**

**WCRC supports Recommendation 6 and would contribute expertise and local knowledge to a database.**

#### **Feedback 7**

**WCRC supports Recommendation 7 but seeks that Recommendation 7 includes:**

- a) A provision that a national database would account for the local risk of newly emerging native ecosystem weeds;**
- b) Recognition that Crown entities are better resourced to identify newly emerging weeds on their properties;**
- c) Regional scanning and surveillance to be resourced by central government;**
- d) Iwi and hapu are appropriately resourced to contribute to scanning and co-ordinated management of newly emerging native ecosystem weeds.**

## **Introduction**

The West Coast Regional Council (the WCRC) appreciates the opportunity to submit on “Space invaders: A review of how New Zealand manages weeds that threaten native ecosystems.”

The Council recognises some of the concerns and risks raised about exotic weed species. The specific areas of concern for the West Coast Community are:

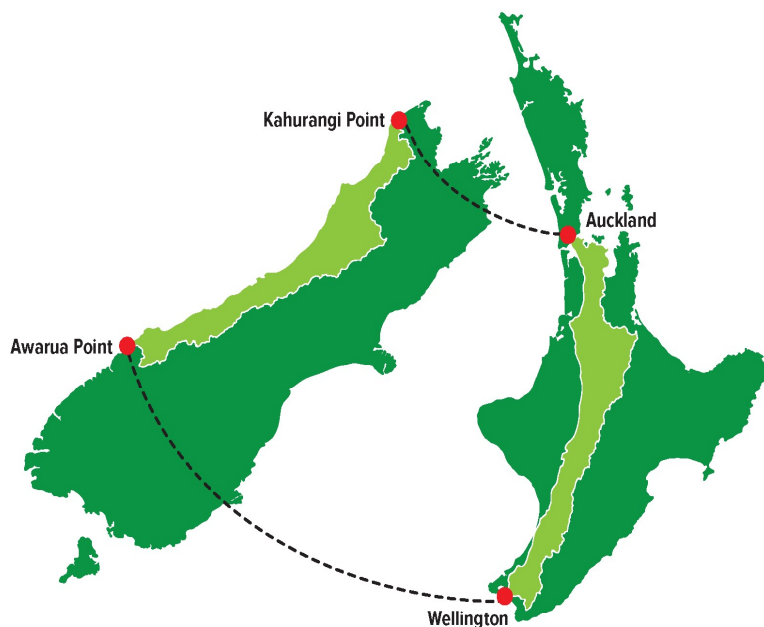
- 1) Effects of uncontrolled weed growth on Department of Conservation and Crown land affecting production land. Crown land includes reserves, national parks, roads and riverbeds.
- 2) Department of Conservation land can be a significant source of weed growth. It is unsustainable for local ratepayers to be expected to meet national direction when the seed source is unrateable land.

- 3) The lack of co-ordination between the biosecurity advantages of Crown concessions and leases, and the Acts that provide for such concessions and leases.
- 4) The direct cost to the West Coast Community to fulfil national pathway and directions.

### **About the Submitter**

The West Coast Regional Council (WCRC) is the local authority for a region covering a vast area with a sparse population. Extending from Kahurangi Point in the north to Awarua Point in the south, this is the approximate distance from Wellington to Auckland.

### **Map of New Zealand to highlight 600km length of West Coast Region compared to distance between Auckland and Wellington**



**The West Coast region stretches the equivalent distance of that between Auckland and Wellington**

The West Coast is predominantly rural and sparsely populated. WCRC works closely with the regions' three territorial authorities (the Buller, Grey and Westland District Councils). Outside of the main towns of Westport, Greymouth, Reefton and Hokitika, the region's relatively low population of approximately 32,600 is spread across smaller settlements and rural communities. It is important that any changes to the way weeds are currently managed is beneficial to the

social, economic, and cultural well-being of all West Coast communities and the natural environment.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). Our Mana Whakahono ā Rohe (Resource Management Act - Iwi Participation Arrangement) captures the intent of the Council and Poutini Ngāi Tahu to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown.

The Conservation Estate comprises 84.17% of the West Coast land area, with an additional 1.55% administered by Land Information New Zealand (LINZ). This leaves 14.28% of land available for private ownership. The land in the Conservation estate and Crown ownership is not rateable by local authorities.

Primary industries account for 23% of the Region’s economy.

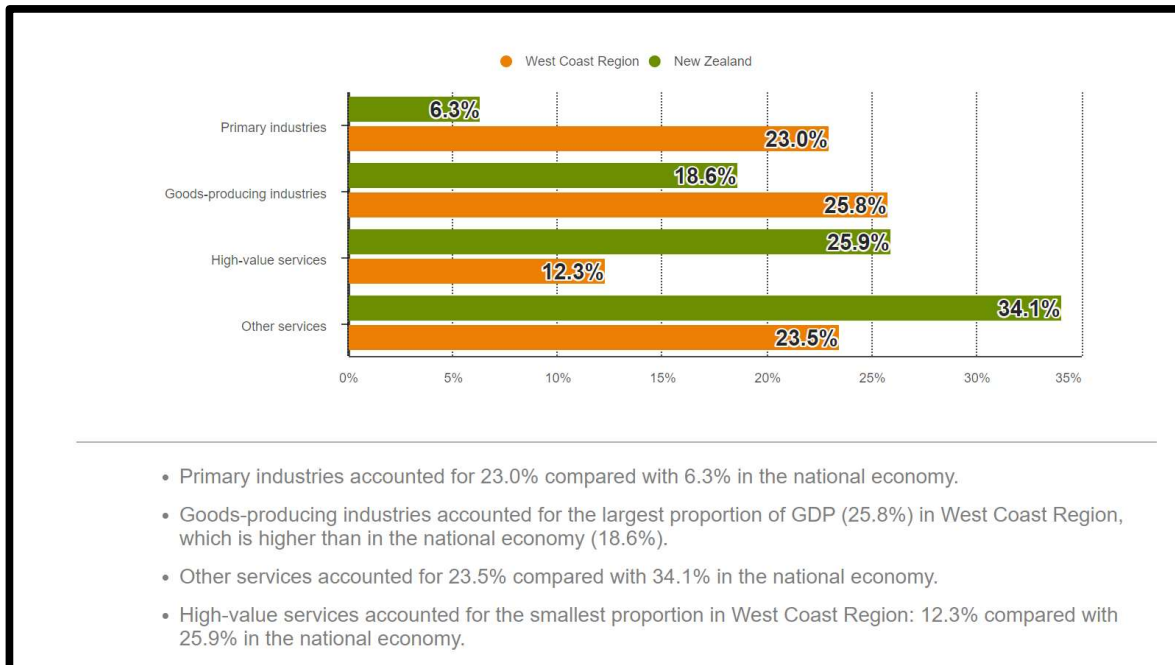


Figure 1 West Coast Annual Economic Profile 2021 Share of total GDP. Source: Infometrics

**Specific West Coast Issues**

*Uncontrolled weed growth on Department of Conservation (DOC) and Crown land affecting production land*

Note that Crown land includes reserves, national parks, roads and riverbeds.

Given that the West Coast has extensive areas of DOC estate, weed growth is noticeable to adjacent private landowners. This is especially apparent where landowners adjacent to DOC and Crown Land are undertaking extensive weed control for things like gorse, buddleia, broom and wilding conifers<sup>1</sup>. DOC land is a significant source of weed growth, it is unsustainable for local ratepayers to be expected to meet national direction for weed control when the seed source may be from unrateable land.

With more land being retired from farming due to Government putting an end to the tenure review and seeking to reclassify stewardship land, more land will need to be managed by already scarce DOC resources. The Council does not wish to be in a position of increasing their functions for biosecurity management when the source of weeds is from land that the Government has taken out of production.

*The lack of co-ordination between the biosecurity advantages of crown concessions and leases, and the Acts that provide for such concessions and leases*

Some uses of Crown land are effective at controlling unwanted weeds such as gorse, broom and buddleia, on 'river run' grazing lease blocks in remote braided rivers in South Westland. Unfortunately, stock fencing regulations, law changes on Crown pastoral land and Conservation policy does not support this practice. Landowners are concerned that if more land goes out of production through revoking of leases, weed control of DOC and Crown land may be compromised due to a lack of resources.

Likewise, there is an impact on the Conservation estate from private land. This is because the pest plants are often planted as ornamentals on private land, and subsequently spread into conservation land negatively affecting the environment.

WCRC are concerned that any additional responsibilities given to the Council for weed control as required by national directive will need to be funded by property rates. This is a direct cost to the West Coast community to fulfil potential national pathway and directions. Bearing in mind that the West Coast has an extremely small and sparse population, and an extensive land area to administer, any additional functions will create a noticeable increase in the rating burden.

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<sup>1</sup> <https://www.stuff.co.nz/business/farming/opinion/125742579/farmers-a-cut-above-doc-in-caring-for-crown-land>

### **Comment on Specific recommendations in the report**

*“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.”*

WCRC comment: A national priority system with a focus on native ecosystem weeds may not gain the support of communities. The clear direction would allow focus on specific weed species, however, there is a risk that a national approach would not account for specific risks to local communities from different weed species. The risks are that regional climate variation or production needs would not be taken into account.

The other issue is a national approach requires support from local communities. There are several reasons for a national approach not gaining support from a local community, such as:

- New Zealand has a range of climates, this means many weeds thrive in some areas, but will never create an impact in others. This can only be known by people who understand local conditions.
- Weeds may impact communities differently depending on the types of production undertaken on land. For example, weeds impacting or spreading due to pastoral production differ from the risk in forested areas.
- There is a perception that crown agencies should focus on managing Crown owned land and properly manage any risk to ratepayers from weed control.
- Private landowners can take an equal role to assess the risk of weed species on private land, but private landowners are unlikely to support additional biosecurity costs through regional council rates.

*“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.”*

### **Feedback 1**

**Any leadership should be accompanied by resourcing. Funding needs to be provided to support weed control, especially when the sources of uncontrolled weeds are not on private or locally managed land.**

Page 5 of the report states that: *“If national resources need to be called upon, it is much harder to mount an economic case.”* This infers that any national leadership will be requiring additional responsibility to be taken on by regional councils, which creates a burden on local Communities.

#### **Feedback 2**

**Whatever policy direction is developed to give national directives, the WCRC supports:**

- e) Working with regional councils to define what national priority weeds should be addressed by the region;**
- f) providing clear direction on the management of emerging weeds, including a requirement for regular, coordinated scanning and surveillance by Government Departments on Crown land;**
- g) Support for any additional WCRC scanning and surveillance on private land;**
- h) specifying roles to define what is to be done nationally, including any financial contributions by central government, and what is to be done regionally.**

#### **Feedback 3**

**Council does not support including a requirement for regular, coordinated scanning and surveillance of pest plants by regional councils, beyond what WCRC already does under its Biosecurity Act functions, without additional support and resources.**

*“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.”*

#### **Feedback 4**

**WCRC supports MPI and DOC officials working with regional councils to define what national priority weeds should be addressed by the region. The WCRC do consider that the Crown and DOC should be better resourced to address native ecosystem weeds on their own land.**

*“Recommendation 4: National policy direction specifically directed to native ecosystem weeds should be provided either:*



*(a) by rewriting the existing National Policy Direction for Pest Management 2015 to include several targeted sections on the management of different pests already present in New Zealand*

*– predators, browsers, invertebrates, pathogens, plants*

*– including one specifically devoted to the management of native ecosystem weeds; or:*

*(b) by amending section 56 of the Biosecurity Act 1993 to allow for multiple targeted national policy directions.”*

WCRC comment: The WCRC is concerned about the effect of directives from either method. Whatever method is used will affect the functions of the WCRC and the ultimate cost to the community. The document is not clear on administration of the required outcomes and who will resource any additional directives from either the National Policy Direction for Pest Management 2015 (NPD) or changes to the Biosecurity Act 2015 (the Act).

Under the NPD, if the National Direction requires additional drafting of pest and pathway management plans and small-scale management programmes for the WCRC, this will create costs in drafting of plans and programmes, as well as the cost to implement and administer the programmes.

Under the Act, Section 56(2) allows for the national policy direction to ensure that activities under this Part provide the best use of available resources. This assumes a more targeted directive within available costs. The WCRC does not currently plan any increase to its biosecurity budget due to higher priority matters such as hazard and freshwater management. The WCRC urges the Committee to be mindful of ratepayer burden and resourcing when considering changes to the national biosecurity programme. If Councils are given more responsibilities for weed control at the local/regional level, such as expanding the RPPMP to include widespread weeds, Council would need more resourcing.

If the additional programmes were to be resourced similar to the Jobs for Nature funding, then there may be an advantage to the WCRC as this could be resourced through the Council-owned VCS Business Unit.

*“Recommendation 5: Any national policy direction that includes policy on native ecosystem weeds should require engagement with iwi and hapū and contain the following minimum content:*

- provide clear direction on national priority weeds by:*
- requiring a group of experts to identify national priority weeds using a robust and transparent prioritisation process by a certain date;*

- *requiring coordinated management of national priority weeds, once they have been determined;*
  - *providing clear direction on management when conflicting values arise;*
- *requiring regular, proactive and coordinated surveillance and monitoring of the national priority weeds;*
- *provide clear direction on the management of emerging weeds, including a requirement for regular, coordinated scanning and surveillance; and*
- *specify roles to define what is to be done nationally, including any financial contributions by central government, and what is to be done regionally.”*

#### **Feedback 5**

**WCRC supports Recommendation 5 but seeks that recommendation 5 includes:**

- a) A provision that a national approach would account for specific risks to local Communities from different weed species;**
- b) Crown entities are better resourced to control weeds on their properties;**
- c) Regional scanning and surveillance is resourced from central government;**
- d) Iwi and hapu are resourced to contribute to national policy direction on scanning and surveillance;**
- e) Training schemes are established to ensure rangitāhe are trained and resourced to contribute to the national approach.**

*“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.”*

#### **Feedback 6**

**WCRC supports Recommendation 6 and would contribute expertise and local knowledge to a database.**

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

**Feedback 7**

**WCRC supports Recommendation 7 but seeks that Recommendation 7 includes:**

- e) A provision that a national database would account for local risk for newly emerging native ecosystem weeds;**
- f) Crown entities are better resourced to identify newly emerging weeds on their properties;**
- g) Regional scanning and surveillance is resourced from central government;**
- h) Iwi and hapu are resourced to contribute to scanning and co-ordinated management of newly emerging native ecosystem weeds.**

This ends our feedback.