



Private Bag 92021

Whangarei Mail Centre

Whangarei 0148

## **Submission on the Proposed Northland Regional Pest and Marine Pathway Management Plan 2017-2027**

### **Introduction**

Bay of Islands Maritime Park Inc. (BOIMP), through its two working groups Fish Forever and Living Waters –Bay of Islands, appreciates the opportunity to comment on the Proposed Regional Pest and Marine Pathway Management Plan 2017-2027. The Bay of Islands Maritime Park Incorporated Society began as an umbrella organisation to bring together a multiplicity of small community groups and create a coordinated approach to issues affecting the natural values of the land and waters of the Bay of Islands. From 2008 its activities have been focused through two working groups. Fish Forever<sup>1</sup> focuses on the marine environment, including the establishment of no-take marine reserves in the Bay of Islands. Living Waters-Bay of Islands Wai-Ora<sup>2</sup> focuses on the catchment, including the management of land and riparian areas to improve the water and habitat quality for both the fresh and marine waters of the Bay of Islands. Much of the work of Living Waters has involved controlling animal and plant pests to secure the restoration of native biodiversity. The vision for BOIMP mission is

*“Restoring native life on land, freshwater and the sea. Dream by dream.”*

We will propose a set of goals for biosecurity in Northland, evaluate how well the provisions in the proposed regional pest and marine pathway plan (RPMPP) address these goals, and will then comment on specific sections of the plan. While we will focus on the marine environment we will also comment on freshwater and terrestrial ecosystem biosecurity. Our submission does not address pests affecting agriculture and other human production systems.

We complement the Council for preparing a marine pathway plan in association with the new regional pest management plan. There do, however, seem to be some inconsistent and at times illogical decisions on the inclusions and exclusions of various species in the regional pest management plan. Only some of these decisions are explained in the lengthy 942 page cost benefit analysis. This document contains much useful information. It is also rather repetitive with the rationale summaries for the excluded species generally being generic and not necessarily tied to the preceding content about that species.

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<sup>1</sup> <http://www.fishforever.org.nz/>

<sup>2</sup> <http://www.livingwatersboi.org.nz/>

## Outcome statement and goals for biosecurity in Northland

Section 5 of the RPMPPP contains objectives for each class of pest as directed by the National Policy Direction. We would like to see the introductory section of the plan contain an ambitious outcome statement and a set of goals for pest management in Northland. A suggested **outcome** statement could be:

*That no new significant pest species establish in Northland's marine, freshwater and terrestrial ecosystems; and the extent and density of identified pest species significantly decreases by 2027, especially for areas of ecological value or undergoing ecological restoration.*

We would like to see the RPMPRP include outcome and process goals for biosecurity in Northland. We suggest the following or similar:

1. Pest species new to Northland and its coastal waters will be promptly detected and actions to eradicate those species will be undertaken promptly and effectively
2. Expansions in the range of existing pest species will be promptly detected and actions to contain those species will be undertaken promptly and effectively
3. Pest species that significantly affect ecological values and are relatively widespread will be excluded or intensively controlled in areas of high ecological value and/or priority areas for ecological restoration
4. There will be a process introduced whereby areas that are being actively protected and/or restored can receive some form of "protection" from nearby pests on neighbouring lands or waters.
5. That those parties with an interest in biosecurity in Northland work closely together responding promptly and effectively to environmental biosecurity crises/ issues
6. That the long-term wider community interest in prompt and efficient responses to biosecurity crises is recognised via adequate funding for: surveillance and prompt action to address regional incursions; and to protect areas of high ecological value and/or subject to ecological restoration
7. That the wider community understands the risks that plant, animal and microbial pests pose to Northland's indigenous ecosystems and takes appropriate actions to minimise these risks and adverse impacts

## How well does the proposed Northland RPMPMP address this outcome statement and goals

It is our assessment that the plan provisions are insufficient to address the outcome statement and goals. We are aware of the increased surveillance for pest species on boat hulls covering 25% of the boats in Northland over the last summer and applaud that. This needs to be accompanied by prompt action if new incursions are found. This does not seem to have been happening for new pest arrivals in the Northland marine environment. For example, *Undaria* was found in Rangaunu and Houhora Harbours two years ago. At that time the extent of *Undaria* was limited. As no effective action was taken to eradicate the *Undaria* it is now widely distributed in Houhora Harbour at least. Without adequate prompt actions to address new incursions/arrivals and range expansions the benefits of an active surveillance programme will not be realised. That is why we urge Council to allocate resources and to actively partner with other organisations to prevent: the establishment

and persistence of new pest species; and expansions in the range of those pests that currently have a limited distribution.

The list of pest species included in the plan is inadequate. The 942 page cost benefit analysis explains why some species have been excluded although we do not necessarily agree with some of these assessments. There seem to be inconsistencies as to which species were even evaluated. For example, why was monkey apple excluded and arum lily included in the species evaluated. The former is widely distributed by birds and grows well in tall native forest including mature tall podocarp/mixed broadleaved forest. Because many people are unable to identify monkey apple in native forest its true impact is not obvious to most. On the other hand Arum lily is very obvious, but it does tend to be a more localised problem, probably associated with the dumping of garden waste.

There also seems to be inconsistencies between pest species included and not included in the final plan. For example, why is *Agapanthus* included when *Tradescantia* and ladder fern (*Nephrolepis cordifolia*) are not? In our opinion all are problematic ground covers and all are banned from sale. All should be included in the Plan. The same occurs with troublesome vines- why is jasmine included but Japanese honeysuckle, smilax, climbing asparagus, and banana passionfruit all excluded from the plan? All adversely affect a range of natural environments in Northland and should be controlled as early as possible with a goal of local eradication in protection and restoration sites. For example, the Living Waters Pipiroa-Te Wahapu ecological restoration project (100ha public land and about 60+ha private land) is seeking to virtually eradicate all these vine species as a high priority.

We also fail to understand why various aquatic pest plants, such as alligator weed, hornwort and *Egeria*, are omitted from the plan. These are all serious environmental weed species that are readily spread via water bodies the Council administers. For example, during floods extensive rafts of alligator weed are transported down the Kawakawa River into the Bay of Islands. From there the alligator weed is washed ashore all over the Bay of Islands, including the outer Ipipiri Islands. Once ashore it scrambles into and can grow in wetlands, terrestrial and other aquatic environments.

Page 14 of the cost-benefit analysis (CBA) identifies the five types of pest management programmes defined in the National Policy Direction (NPD) for biosecurity. Page 18 of the CBA states that a number of species included in the 2010-2015 pest management strategy are not included in the new plan. The CBA states that pests not yet established in New Zealand, or are thought to have been eradicated, can not be included in the new regional pest management plan. This applies to a number of marine pest species including Asian clam, *Caulerpa taxifolia*, Chinese mitten crab, European shore crab, Northern Pacific seastar, Asian shore crab, Asian rapa whelk, brown mussel, black-striped mussel, European clam and golden mussel. The reason given for these exclusions is that regional pest management plans are not to be inconsistent with the National Policy Direction and so it must use one or more of five management strategies. We consider that the first management programme – exclusion – would be relevant in this context. In our opinion Northland is highly likely to be an early arrival location for a number of these species given that many vessels from overseas arrive and spend considerable time in Northland. To not include these species in the regional marine biosecurity surveillance and subsequent response action programme could result in new marine pest species establishing in Northland.

We also disagree with the plan omitting a number (but not all) species that are included in the pest plant accord. The reason given on page 21 of the CBA is to avoid duplication. We do not think that

this is a good idea as it is not clear to readers of the RPMPMP that this is what has been done. Also there are species in that accord which are included in the RPMPMP. As a result people may think that a number of serious plant pests are not considered to be a pest by Northland Regional Council. We would like to see all those species that have been excluded (list on page 19-20, CBA) reinstated into the RPMPMP. There are some additional species that also should be included (e.g. moth plant, Mexican devil).

In our opinion the plan gives insufficient attention given to the management of existing pest species. We would like to have seen some site-led as well as pest-led management. This is alluded to in the cost-benefit analyses but does not seem to have been properly developed in the plan. Even if the Council could not fully identify all such sites at this stage, we would like to see the plan contain indicative criteria and an initial set of sites. For example, the ecological values of Rangaunu Harbour are highly significant and the removal of pest species should be a very high priority. This would include the removal of *Undaria*.

## Comments on specific sections of the RPMPP

### Chapter 4 Organisms declared as pests

As discussed in the previous section of this submission we consider that the list of species classified as pests is incomplete. We discuss omitted marine species in our comments on chapter 10 of the plan. Additional terrestrial and freshwater species that should be in this plan (in either the site-led or in some cases the sustained control programmes) include Japanese honeysuckle, moth plant, Bangalow palm, loquat, monkey apple, banana passionfruit, blue morning glory, montbretia, dusky coral pea (*Kennedia rubicunda*), boneseed, Mexican devil, mistflower, *Lagarosiphon*, *Egeria*, hornwort, alligator weed, *Myriophyllum aquaticum*, climbing asparagus, smilax, arundo grass, Mercer grass, feral blackberry, grey willow, crack willow, ladder fern (*Nephrolepis cordifolia*), climbing dock, Australian sedge, *Tradescantia*, and aluminium plant (*Galeobdolon luteum*).

### Chapter 5 Programmes and attributes

We would like to see the plan include site-led programmes and pests as provided for in the National Policy Direction on Biosecurity. We propose that there be provision for site-led programmes for areas of high ecological value and for sites undergoing comprehensive ecological restoration. In the case of the latter we suggest that there be a process whereby the Council or other organisations can propose a site-led programme, such as a CPCA or similar, for an area where there is a comprehensive ecological restoration programme. For each site-led programme there should be provision for control programmes for identified site-led pest species on adjoining lands or waters. The specific provisions would vary depending on the pest species and its method and distance of spread. We would like to see a fund established to assist with this control.

### Chapter 6 Plants

We support the content of this chapter but again consider that there should be additional species included especially in the sustained control and site-led pest species lists. The rules for some sustained control species do not adequately acknowledge how far each species seeds can spread and the likely impact on native ecosystems. We would like to see the removal distances for properties adjoining places being managed for environmental values increased for the following species:

- privet (bird spread seed)
- wild ginger (bird spread seed and spread by rhizome fragments)
- wildling conifers (wind spread seed)

Woolly nightshade should also be controlled for environmental reasons. Birds carry seed into mature intact native forest where it can readily grow, especially if there is any disturbance. It should also be included in rule 6.4.2.2.

There are a number of other species that should be included in the table in chapter 6.4.1. These species, with additions as discussed in the context of chapter 4, should also be site-led pests.

### **Chapter 7: Animals**

This chapter is supported.

### **Chapter 8 Diseases and pathogens**

This chapter is supported

### **Chapter 9 Freshwater**

This chapter should contain additional plant pest species as previously discussed. These additional species include alligator weed, hornwort, *Lagarosiphon*, *Egeria* and crack willow.

### **Chapter 10 Marine: 10.1 Marine Pathway Plan**

We support the inclusion of a Marine Pathway Plan and its objective, aims and rules relating to vessels with the proviso that the term “light fouling” be clarified. We are puzzled that goose barnacles are considered acceptable fouling when it appears that the usual barnacles found on local boats are apparently not. An item has to be in the water for a long time before it collects goose barnacles. The low resolution picture on page 109 of the plan is unlabelled but appears to show a boat hull with patchy antifouling and goose barnacles. Is this meant to be acceptable or unacceptable? We suggest that the term “light fouling” be defined to include slime and juvenile common barnacles (*Elminius modestus*) less than 5mm tall.

The six or one provision used by marinas has been discussed in some of the Northland Regional Council material literature describing various plan provisions. As it is not practical to expect boat owners to haul their boat every six months for reasons of cost and time, it is important that effective antifouling paints can be continue to be used and developed for steel, fibreglass, wood and concrete boats. Antifouling paints available for aluminium hulls are less effective and so the owners need to take more care. Hopefully improved antifouling paints will also be developed for aluminium hulls. For yachts hard coat antifoul paint is probably best as this can be wiped or brushed to remove slime and juvenile barnacles while at the same time removing minimal antifoul.

We consider that the Marine Pathway Plan should also address aquaculture. The aquaculture industry moves a lot of material from place to place and has spread alien species in the past (e.g. Pacific oyster, *Undaria*). In addition the industry generates much rubbish which can be moved considerable distances. A recent Living Waters shore clean-up along 5km of inner Bay of Islands shoreline generated two cubic metres of rubbish and at least 0.5 cubic metres of materials that could be reused or recycled (after appropriate cleaning). About 10% of the rubbish obviously came from marine farms.

We would like to see the rules relating to in-water hull cleaning summarised in the pathway plan so that boat owners don't have to refer to multiple documents. We would be very cautious about the use of (inter)tidal grids (mentioned in non-plan documentation) as these may be used to circumvent travel lifts and other haul-outs where debris is collected and not discharged back into the sea. In-water boat hull cleaning (at or near where a boat is moored) is necessary to keep hulls relatively clean in the very fertile waters of many Northland Harbours. There can be a significant risk posed by boats that are usually moored in harbours where there are no haul-out facilities, travelling to harbours which have haul-out facilities. For example, boats travelling from Houhora to Bay of Islands may spread *Undaria* to the Bay of Islands. *Undaria* has been confirmed on at least some boat hulls moored in Houhora (Vince Kerr, pers. comm.).

We would also like to see Northland Regional Council undertake much more work on projects that reduce the amounts of fine sediment and nutrients reaching the harbour waters where most Northland boats are moored. All this fine sediment and nutrients encourages the rapid fouling of vessels and marine-based structures and tests the efficacy of any antifouling paint. Also the typical poor water clarity makes it difficult for owners and others to undertake full inspections of underwater hull fouling.

The plan mentions that MPI is responsible for hull biosecurity matters for vessels arriving from overseas. It would be useful to have the web link for the MPI Craft Risk Management Standard referred to in the plan.

#### **Chapter 10 Marine: 10.2 Sustained control marine pests**

This section is supported. It does however only include six taxa. As discussed earlier in this submission we think that there should also be species in the exclusion programme category. This proposed plan has removed a number of marine pest species that were in the previous Northland Regional Council biosecurity strategy. Those species should generally all be included in the exclusion programme category in the current plan. Our concern is that if these marine pest species (e.g. *Caulerpa taxifolia*) are not in the plan they would not be included as part of the regional marine pest surveillance programme. This means that they could enter New Zealand, and become sufficiently established (and possibly transported to Northland if they arrived elsewhere), so that by the time they were found eradication would no longer be practicable.

We acknowledge that MPI has a 2014 Craft Risk Management Standard (CRMS-BIOFOUL) that will become a statutory requirement by 2018. That provides strict control for vessels staying more than 21 days in New Zealand and visiting places other than ports of arrival. The biosecurity standards for vessels staying less than 20 days in New Zealand waters and only visiting ports of arrival (including Opuia and Whangarei) are less strict. There are some risks with the latter category of vessels depending on enforcement and we suggest that it would be wise for the Northland Regional Council surveillance programme to also check for identified high-risk marine pest species that are not currently known to be present in New Zealand.

#### **Attendance at a hearing**

BOIMP would like to present further information to Council at the hearing to be held in Waitangi.

Contact: Victoria Froude, [vfroude@slingshot.co.nz](mailto:vfroude@slingshot.co.nz) 021 077 3378

### **Submission process**

This submission has been prepared by Victoria Froude and approved by the co-chairs of Living Waters (Chris Richmond) and Fish Forever (John Booth).

Yours sincerely

Victoria Froude