



National Council of Women of New Zealand

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Submission to the Ministry of Agriculture and Forestry on the Draft National Pest Plant Accord

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 43 nationally organised societies. It has 34 branches spread throughout the country to which women from some 150 societies are affiliated.

This submission is written for NCWNZ by members of the Environment Standing Committee.

Introduction

NCWNZ members are concerned about introduced plant species encroaching into New Zealand's indigenous ecosystems and the way many of these plants have become pests. In 1992 NCWNZ passed a resolution that the Minister for the Environment "...identify, and register on a national basis, those introduced plants and animals which have become, or have the potential to become, environmentally harmful..." NCWNZ is pleased to have the opportunity to support action on this resolution.

Section 3: Scope.

This document appears to be a legal instrument rather than a management tool is trying to include in a comprehensive whole a policy that will apply throughout New Zealand for the present and future. While these aims are laudable, they need to inform council strategy in their particular planning and policy documents.

Section 4: Purpose.

NCWNZ supports fully the purpose of the Accord. Controlling the propagation, sale and distribution of plant pest has been a major issue and this document provides a means of co-operating with the "National Surveillance Plant Pests" booklet.

4.2 NCWNZ queries whether there would be regionalisation of the pest plant lists. While having a national list does away with the details required at local body level and makes their job easier, it does seem wasteful of resources to aim to inspect for and eradicate plants that are a pest in some regions but offer little problem in other areas.

Section 5: Costs.

Participation should not be limited to those who can pay. Having the costs "lie where they fall" would discriminate against those groups without large resources. The issue of costs brings problems of boundary issues and responsibilities for reserve land. The allocation of funding for pest control on an annual basis can result in the cessation of work when the money runs out rather than when the job is complete.

The group to be set up will need to have some sort of operating budget to cover the costs of implementing the Accord. NWNZ trusts that MAF Biosecurity Authority has planning for this in hand.



**Section 6: Roles.**

6.2 It is expected that all councils will be involved, as pest control; is a function under the Biosecurity Act. All councils have a staff member who goes into plant nurseries and shops to check on plants being sold – they get good co-operation.

NCWNZ suggests that leaving individual councils to decide on the nature and frequency of inspections is too vague. Some guidelines as to how often they should be done and what to look for may assist councils in performing this function effectively.

6.3 Liaison with the Environmental Risk Management Authority (ERMA) would be beneficial in the determination of unwanted organism status, which may vary in different parts of the country. NCWNZ assumes that the definition of an unwanted organism is determined by the definition of plant pest in Section 1, but this should be made clearer. Without clear agreement on what makes an organism unwanted or to whom it is unwanted there is potential for conflict between stakeholders.

6.4 The monitoring body is to be the Biosecurity Authority, but NCWNZ questions who will monitor them and suggests that this could be a task for the Ministry for the Environment. Reporting back is one method of monitoring, but how often and in what detail this is required is not clear. Some council strategies have a 10 year life cycle and for these continuous and immediate monitoring would be preferable rather than wait until the end of the time.

Section 7: Working groups

NCWNZ expects that ERMA would have a part to play here as an organisation that is already considering new organisms. Technical officers need to have adequate training but whose has the responsibility this is needs to be clarified. NCWNZ suggests that another sub-section is inserted that will make this clear.

Section 8: Amendment of the Accord.

All local bodies should be part of the Accord from the beginning, but there should be room to include others to accommodate particular circumstances e.g. Fish and Game Council for aquatic plants. The review process (Section 10.1) is a vehicle for doing this. Including all interested parties from the start would go some way towards ensuring standardisation of practice throughout the country.

Section 11: Signatories.

The proposed signatories should be publicised so that they can be commented on. NCWNZ suggests that the Department of Conservation, as a Crown agency with responsibility for large tracts of land, should be one of the initial signatories.

Conclusion

The Accord is a statement which forms part of the Biosecurity Act (1993) and seems to provide a sound basis for action. NCWNZ supports its purpose of protecting New Zealand's biological heritage from unwanted plants that threaten it. However, it is not a binding contract and will run initially for only five years, with amendments at any time under certain conditions. If this is a trial version leading to a permanent Accord, then NCWNZ looks forward to its further development. As a finished agreement NCWNZ considers that there are several ways the councils can be non-compliant and would look for these to be rectified.

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