

# PROTECT



THE OFFICIAL NEWSLETTER OF THE INSTITUTE OF NOXIOUS PLANTS OFFICERS INC.

Issue No. 12, October 1989

## E D I T O R I A L

Already I have fallen behind my intended schedule in producing my second edition of Protect. I can only hope that it has been worth the wait.

There has been a steady flow of items received for inclusion in Protect, and I thank those of you who have contributed. The majority of you though have yet to make a contribution, so come on, pull finger. To date there have only been about fifteen individual contributors so there is scope for a better coverage.

Some minor complaints arose out of the first edition notably with reference to the funnies and rude bits. My humble apologies to any of you who were offended, but I believe the majority of the readers were not upset by the minor content. I am not a censor and I will continue to publish what I am sent from the members.

Should any of you wish to be a little provocative why don't you write a few letters to yours truly and I will start off a column. I am prepared to publish a nom de plume, but you must sign your name for my information.

And just harking back to items for Protect. I am particularly interested in receiving items from the earlier days of the Institute so if you can oblige I will try to start up a regular column of blasts from the past.

There is also interest in what the respective branches are doing so how about each Executive Member or Secretary keeping me informed of branch happenings. A year between conferences is a long time to wait to find out what everyone has been doing.

Reorganisation is almost upon us and as from 1 November 1989 New Zealand will have but 14 city councils, 59 district councils and one remaining county council. The largest populations will be Auckland 301,000, Christchurch 286,000 and Manakau 206,000.

Anyone interested in further information on the biology and control of wild garlic (see item, this edition) can contact me. I have an Australian paper on the subject.

Remember now, keep the items rolling in. I can't guarantee I will publish everything but I sure will try.

Keith Crothers  
EDITOR

Note: The views expressed in this newsletter do not necessarily reflect the views of the Institute.

Co-ordinating Editor: Keith Crothers, PO Box 903, Invercargill

## FROM THE NEWS DESK

### Withholding Tax Deductions

The Institute Treasurer wishes to acknowledge the work done by Don Rhodes in sending the appropriate documentation to him (Murray Turner), thus ensuring the Institute is exempted from paying deductions on any interest or dividends. Good to see that some people are thinking about things other than their own situations. Well done Don.

### National Roads Board Policy

In response to enquiries from Don Rhodes and Des Trafford as to the National Roads Board attitude to the control of noxious plants on its state highways the following is taken from a letter dated 22 February 1989 written by R A Smith, National Roads Board, Auckland.

"The Board policy on this is set out in Section 1.2(8) of the NRB Policy and Procedure Manual as well as Section 3.8(4) of that same manual. The former states:

'Under the Noxious Plants Act 1978, the Board is responsible for controlling noxious plants on all board owned land that is not within a road reserve. Section 50 of the Act places the responsibility for noxious plant control within a road reserve on the adjoining owner.'

The latter states:

'Maintenance of roadside vegetation should be minimised and confined to grass cutting once or twice a year, with the spraying against noxious weeds in rest areas and encroachment growth as and when required. Sight distance lines are to be maintained by trimming as necessary.'

This office rigidly follows this policy and noxious weeds and plants should only be controlled within the road reserve when they limit sight distance, cause an obstruction to the drainage facilities or are in rest areas, otherwise the responsibility is on the adjacent land owner and we rely on the local authority noxious plant inspector to ensure and maintain control."

Don believes they are wrong because of the reference to Crown Land in Sections 2 and 4 of the Noxious Plants Act 1978. Any comments?

### Retirement

The Auckland-North Noxious Plants Officers recently presented the Mt Albert DSIR Botanist, Alan Esler, with a farewell gift on his retirement 17 July 1989. In thanking him for his past valued help Alan was told it had been a privilege to have been associated with him, for his plant identification and guidance which was always in such a humble, approachable, advisory manner.

Alan was presented with a book on 'Weeds of Australia' (referred to in previous issue of Protect) and immediately identified a garden escape which had puzzled him for years.

Alan's association with NPO's began in Palmerston North prior to 1970 when he moved to the Auckland region.

#### South African Connection

Neville Daniel has recently returned from a two month visit to South Africa. Through the New Zealand Wool Board Neville was successful with an application for a study award. Up against some stiff competition, Neville's proposal to undertake a study into nassella tussock in South Africa was accepted and he left New Zealand in late August.

I hope to be able to give you a report on Neville's visit in a future edition.

#### Airfares Flying High

There have been murmurings among members as to why the full Executive are not asked to attend emergency meetings.

Perhaps the fact that to have done so in the past would have cost the Institute \$3,974.00. That is more than a full year's subscriptions.

#### Thames/Coromandel Newcomers

Keith Anstis moved his family to Thames in May. He was made redundant from Taumarunui last Christmas.

In August, Phillip Dawson from the Northern KCPD Board at Otorohanga was appointed as the other Noxious Plants/Pest Destruction Officer for the Thames/Coromandel District Council.

He will be based at Whitianga, Mercury Bay, (in time for the America's Cup contest). Phillip originated from the deep south and has worked in pest destruction amongst the tussock country of Tarras - Hawea Flat.

Phillip is married to Phillipa and is already looking at Trailer Sailors. Aquatic weeds in Whitianga harbour???

#### Request from Oz

The Secretary has received a request from Ms Ursula Worts in Western Australia concerning a campaign she is running to highlight the dangers associated with all DATURA (Angels Trumpets) and her bid to have them banned from home gardens.

Ms Worts' letter is brief and a little vague but I gather that she would like New Zealand to follow Western Australia's lead to have Datura banned here. Anyone wishing to correspond with Ms Worts on the subject can do so by writing to her at this address:

R.M.B. 383  
Kojonup 6395  
WESTERN AUSTRALIA

#### Nassella Pamphlets

Remember those lovely glossy pamphlets entitled 'Can you recognise Nassella Tussock'. Lovely colour photographs on a four page format. Well Rob McCaw of Waimate and Graham Strickett would be very grateful to any of you who can supply them with a few copies. It appears MAF have no more available so if you can spare just a few please send them to Rob or Graham.

#### Aquatic Wonderland

Recently, an NPO in the northern region discovered a garden pond site of water poppy, which is one of MAF's 'latent' noxious plants. With the landowner's permission it was duly removed and when asked the landowner said that he had got the plant off an old lady in a neighbouring DNPA. This fact was reported to the NPO at the neighbouring DNPA who in turn went to see the supplier of the water poppy. Well, this trip not only located several other undesirable aquatic species but also unearthed the fact that this little old lady was the mother of his DNPA's Chairman. A case of "some mothers do have 'em?"

#### Field-days Display Unit made use of in Public Shopping Area

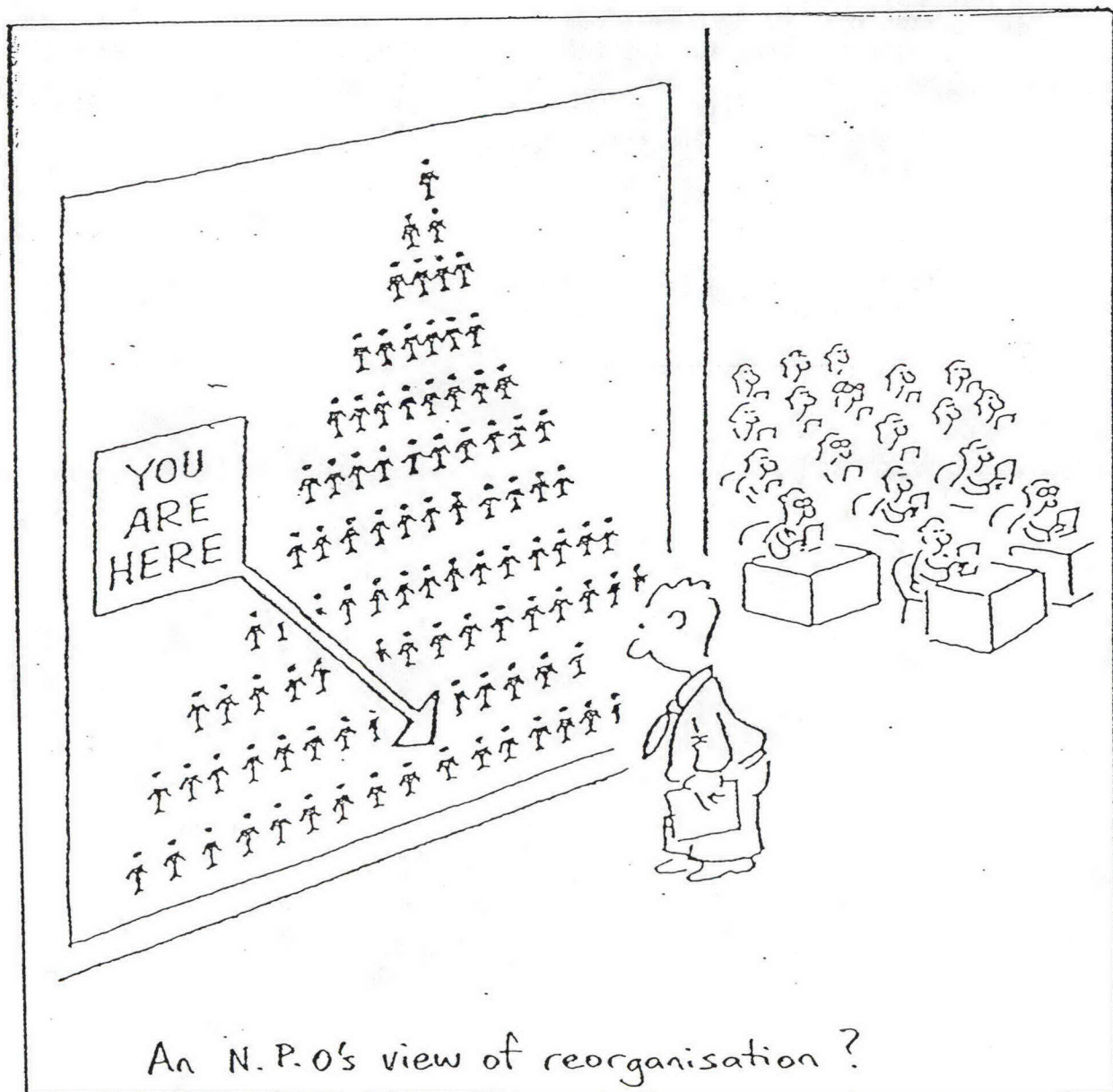
The South Auckland Branch of the Institute of Noxious Plants Officers in conjunction with Aquatics division of MAF has made good use of the display unit in Centre Place, Hamilton.

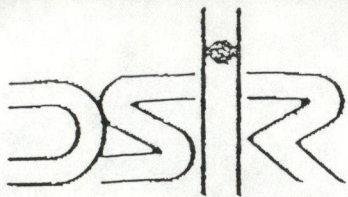
This is a large shopping complex in the centre of Hamilton with many people using the thoroughfare.

While the numbers viewing the display were not as great as at Field-days the quality of questions asked and interest shown was of good value.

Advertising over the radio had people calling with samples for identification or questions - some of which were problem-posers.

The stand was manned for half a day each by Noxious Plants Officers and MAF staff from Monday to Friday.





Department of Scientific and Industrial Research

Botany  
Division

MJP:ST

REF: BD 11/1/3

28 July 1989

Mr Eric J Eden  
National Secretary  
The Institute of Noxious Plants  
Officers Inc  
PO Box 3127  
Richmond  
NELSON

Dear Mr Eden

I am delighted to tell you that Botany Division, DSIR has changed their policy on charging for identifying plants. We feel that an important source of information, particularly on weedy species, was being lost by charging and stifling the free flow of information between the Noxious Plants Officers and Botany Division.

I would like to circulate the enclosed letter and information sheet to the members of the Institute of Noxious Plants Officers Inc.

Would it be possible to have a list of the current members of the Institute and their addresses?

Many thanks for your help.

Yours sincerely

Dr Murray J Parsons  
Herbarium Keeper

July, 1989

To all Botany Division Staff:

To all persons requiring the identification of plants:

In September 1986 the general government policy of recovering costs for services was implemented (the "User Pays" policy). From this date Botany Division, DSIR has charged for plant identifications unless the plant specimen was retained in the Herbarium for further scientific use. The net result of this policy has been that the numbers of plant identifications have dropped dramatically and we feel that we are now losing valuable scientific specimens and information as a consequence.

In 1985 we identified 1177 specimens; in 1986 (the charges began in September) this dropped to 619 and in 1987, our first full year of charging, we determined only 204 specimens.

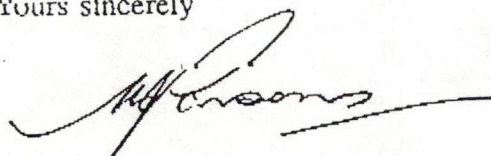
Since we are losing valuable specimens and information on possibly new and unusual plants and on plant distributions, and little revenue is generated, the identification of plants will now be free.

Identification of plants suspected of poisoning humans or animals has always been free.

Only when clients gain commercially from the information provided by the division will a charge for plant identification of \$30.00 plus GST be made for each specimen or \$90.00 per hour plus GST for bundles of specimens. A charge will also be made for any forensic analysis or forensic plant determination.

I enclose information that will assist any person wishing to have plants identified to provide us with the best material for an accurate determination.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'M. J. Parsons', with a long horizontal flourish extending to the right.

Dr Murray J. Parsons  
Herbarium Keeper for Director

CONTRACTORS FEDERATION  
RURAL ASSID CONTRACTORS SECTION  
ANNUAL CONFERENCE JUNE 1989

In June I attended part of the Annual Conference of the Contractors Federation (Rural Assid Contractors Section) which was held in Nelson.

In my address I used a portion of my opening address to our own Institute Conference in Timaru in which mention was made of the changes that were happening in Local Government and the need to encourage the farming community to control weeds on land before things became worse than they are.

I also touched on the application of herbicides in urban and amenity areas. This was based on the code of practice put out by a central Auckland D.N.P.A. and I reiterated my own thoughts that I saw no problems in herbicides being applied in the urban areas provided that the work was done by a registered applicator and that all reasonable precautions were taken when carrying out the work.

The main thrust of my paper was the Institute's submission on pesticides issues and options. This was well received by all delegates and the section agreed with many of the points we had raised especially in relation to training.

Unbeknown to me at the time of my address was that the speaker following was from the Pesticides Board and whilst they acknowledged the good value of our submission they were somewhat sceptical about the part on biological control.

In thanking me for the address by one of their executive members, he touched on briefly the hardy annual of noxious plants officers carrying out spraying work which I let go without comment.

In the afternoon the Contractors carried out their spraying competition which unfortunately was held in weather conditions less than desirable.

N.Z. PEST DESTRUCTION OFFICERS INSTITUTE  
ANNUAL CONFERENCE - BLENHEIM SEPTEMBER 1989

At the beginning of the month, I attended the Annual Conference of the N.Z. Pest Destruction Officers Institute, which was held in here in Blenheim.

Whilst I was only able to attend for a short period of time, I listened to three papers on honey production and its associated problems, rabbit farming, and possums as a pest.

My address to Conference was only of a limited time due to them running late however I was able to give them some insight to our submissions on the review of weed and Animal Pest Management legislation, this was quite well received as their submissions had been based on much the same lines.

I raised the question with regard to amalgamation of the two Institutes. At present we have agreed to allow things to settle down as far as local Government amalgamation is concerned to see where we are all heading and to keep our options open. We will review the situation about next April but suggested that we should have an ongoing slot at each others Conference, which they agreed. In some ways I feel that this should have happened years ago because when you think of it we tend to have similar problems.



D.J. BROWN,  
NATIONAL PRESIDENT.

### From the Field Officer's Desk

The pace of change is gaining and by now some Noxious Plants Officers are identified with positions for the future. Congratulations to those who have secured a place of prominence in the new administration.

Doug and I hope to have our future positions established soon. With the endorsement of Council as to the value of our experience and knowledge of the District Noxious Plants administration and general noxious plant operations, a position in the National organisation may be appropriate.

Since my last article, the response with annual reports has been good. Thank you to those Officers who readily acknowledged the reminder and submitted their report. To date I have on hand copies from 24 of the total 39 authorities which is a lot better than the previous four, but still a long way short of them all.

I would emphasise that any lack of discipline in the past administration will be the biggest change many Noxious Plants Officers will need to address, as I can see the off handed way Officers have met their commitment to Council's policies and criteria without being hounded in some cases may be their downfall in the future. The commitment must be to "Do a better job than before" and not to sit on an achievement gained some time back. A thorough and consistent approach will assist in the long term gains and the "On again off again" attitude will not help. As Officers we have always been critical of Governments who continually change the rules and systems, so why should we be seen to be any different.

All District Noxious Plants Authorities will have by now received a set of Mini Posters with the Council's information text for your use. I am confident they will assist officers in their work of education and promotions. With the season of plant growth now here, many undesirables will be raising their ugly heads. The posters will help to identify any new finds. I noticed last week Cape Tulip is well developed in growth and *Pennisetum macrourum* looking pretty lively. I hope in the midst of all the change and uncertainty, the needs of the weeds will not be overlooked. Hopefully the planning for control is completed and the monitoring of known sites with the surveillance of other areas that may have an infestation of an undesirable nature has commenced at this time.

New finds of plants continue to be made and one can only hope that with the support of all involved with the land, this trend will continue in future to consolidate the effort made to date.

The profile Department of Conservation is giving *Clematis vitalba* at present is good and similar to that which Noxious Plants Council did in 1982 and has continued to a lesser degree until this time. The longer serving officers will recall the Council's survey undertaken to establish the extent of infestation, the research project on the plant and of course the thousands of posters and pamphlets distributed to all District Noxious Plants Authorities and other agencies, with a realisation that some areas infested will likely stay that way until a more suitable control with herbicide or a biological agent is found. Nevertheless one must continue to preserve the conservation values of our land and flora and continue to implement sound based strategies on those appropriate infestations. Until next time - good weeding.

GRAHAM STRICKETT, FIELD OFFICER

# FROM THE COURTS



This has been a long and drawn out affair which started back in August 1986 and goes as follows.

In August 1986 notices were served on a local farmer for the eradication of gorse on his land. Five separate sections in all.

These notices were set to expire at the end of November 1986.

The due date arrived and no work had been carried out, so the matter was placed in the hands of the solicitor.

The case was brought before the Courts in July 1987 at which the defendants solicitor stated that they would be happy to sign up agreements, which we agreed to.

The Judge told both parties to go away and work out their differences, which was done with the signing of the agreements.

These agreements had difference expiry dates for individual properties set on them depending on the degrees of infestation.

These agreements also allowed for the owner to slash areas of the gorse because of his poor financial state.

However when the expiry dates for all agreements had been passed no work had been completed so it was decided that fresh notices should be issued.

This was duly done and the expiry dates were set down for August 1988 with the provision for him to slash the gorse.

The owner came back at the expiry dates claiming that the equipment and labour had broken down so extensions to the notices were given. These were set to expire in November 1988.

Inspections were carried out on the expiry dates and no work had been carried out.

The matter was again placed in the hands of the solicitor and the case was finally heard in the New Plymouth District Court in August 1989 after it had been remanded on two occasions.

His honour Judge Nicholson stated that these were serious matters and further that the defendant had been given a lot of latitude by the authorities and his efforts to date had been ineffective.

Judge Nicholson requested an indication from the DNPA's solicitor regarding the penalty being sought.

The DNPA exercised the option of the continuing fine.

The Judge then convicted the defendant on all five charges and fined him \$50.00 on each charge for every day during which the offence continued from the 3rd August, plus \$65.00 Court costs on each charge and solicitors fees of \$300.00.

The Judge indicated that he expected the Noxious Plants Officer in view of the nature of the penalty to perform daily inspections of the gorse and of Mr Corric's efforts at eradication.

Subsequently the Judge then informed us that he was in error when he fined the defendant for failing to comply into the future and that the defendant could only be fined for the period from the expiry of the notices until the final court appearance.

The case was recalled on the 31st August where the Judge imposed a fine of \$100.00 plus \$65.00 court costs for one particular section that had been completed. On each of the other four sections he was convicted and fined \$200.00 and \$65.00 court costs.

Further the defendant was ordered to pay solicitors fees of \$400.00 for a total fine of \$1,625.00.

Added to this the defendant also paid a bond of \$1,500.00 to the Authority should the work not be completed to the NPO's satisfaction by 30th October 1989.

(Oh by the way the work has nearly been completed with only about one to two days control work left).

There was a little humour to come out of this story. The day before the court case an inspection was made of the defendants properties to ascertain the amount of work that had been carried out.

Accompanying the defendant and myself on the inspection was the chairman of the DNPA and the defendants solicitor.

After the inspection had been completed we were standing around discussing the issue when the defendant spoke out.

"Well David, I think you have done me a favour be serving these notices on me."

How is that I replied.

"Well he said now that I have been made to start spraying the gorse I will have to continue otherwise it will have been a waste of time and money."

Needless to say I felt like driving my boot into his backside, but being the professional that I was trained to be I stood there calmly and told him that I was sorry that it had to come so far down the track for him to realise this.

However the conviction was a good one and it received good publicity both on the radio and through the newspaper throughout Taranaki.

David Bayly  
NOXIOUS PLANTS OFFICER

Large or small, however, the removal of property leaves beret owners very grumpy indeed.

*Rural News* 5/6/89

Nelson farmers support keeping noxious plant control at the grassroots level.

*Nelson Evening Mail* 23/6/89

So play it safe — get a ride home with a sober driver. Or get a taxi. Or see if you can crash for the night.

*Tairi Herald* 20/6/89

#### CAVEAT

On the disposition and dispersal of public assets and rights. I am indigenous to New Zealand and therefore native to some. I have a family or tribe. As a parent I lead this group. I am therefore a native chief with a native tribe or family. I hereby claim rights as a peer under the Treaty of Waitangi. Barry Cowlshaw, peer to all Kiwis.  
PS Might I suggest referenda.

*N.Z. Herald* 19.7.89.

## NOXIOUS PLANTS

A man who admitted breaching the 1978 Noxious Plants Act by failing to comply with the requirements of a notice served on him by the Silverpeaks Combined District Noxious Plants Authority, was convicted and fined when he appeared before Judge R. L. Young.

Andrew Millar Beamish, builder, had been required by the authority to control the class B noxious plants, gorse and broom, on property bounded by Hocken St, Havelock St and Stone St, Dunedin.

Beamish was served with the notice at the end of October last year and did not comply with its requirements within the 14 days specified.

Charged with breaching the Noxious Plants Act, he pleaded not guilty. But after appearing before Judge Young he was convicted of the offence.

He cleared the gorse and broom after receiving the court summons, Beamish told the judge.

Beamish was fined \$300 and ordered to pay court costs \$65 and a solicitor's fee of \$200.

Mr Beamish over the last three years did not do any boundary clearances, but left it up to goats to control. The goats were not fenced correctly and control was not achieved.

He finally hand cleared a 10 metre boundary clearance over some 300 metres one or two days after he received the summons to appear in court.

Mr Beamish's property fronts onto six urban properties free of any noxious plants growth.

The District Court Judge was very up with the Noxious Plants Act 1978 and was well aware of the penalties (Section 56) \$150.00 a day during which the offence continues and he felt that all occupiers have a responsibility to stop the spread of all Class B noxious plants if they possibly can.

## REVIEW OF WEED and ANIMAL PEST MANAGEMENT LEGISLATION.

In the beginning was the Discussion Document and then came the submissions  
and the submissions were filed and ignored.  
and the plan was without substance  
and there was darkness upon the faces of the Noxious Plants Officers  
They spoke unto their District Managers saying:

"It is a crock of shit and it stinketh!"

And the District Managers went unto their District Councils and sayeth:

"It is a pail of dung and none may abide the odour thereof."

And the District Council went unto the Regional Manager and sayeth unto them

"It is a container of excrement and it is very strong such that none  
abide it."

And the Regional Manager went unto their NPC Field Officers and sayeth unto them:

"It is a vessel of fertilizer and none may abide it's strenght"

And the NCP Field Officers went unto their Director-General and sayeth:

"It contains much of that which aids plant growth, and it is very  
strong."

And the Director-General went unto the Associate Minister and sayeth unto  
him:

"It promoteth growth and it is very powerful."

And the Associate Minister went unto the Minister and sayeth unto  
him:

"This powerful new plan will actively promote the growth and  
efficiency of the department and will attract appropriations.

And the Minister looked upon the Document and saw that it was good.

And the Document became law.

## FOOD FOR THOUGHT:

Three young women were attending a class in logic, and the professor  
stated he was going to test their ability at situation reasoning.

"Let us assume," he said, "that you are aboard a small craft  
alone in the Pacific, and you spot a vessel approaching you with  
several thousand sex starved sailors on board. What would you do  
in this situation to avoid any problems?"

"I would attempt to turn my craft in the opposite direction,"  
said the redhead.

"I would pass them, trusting my knife to keep me safe," said  
the brunette.

"Frankly," murmured the blonde, "I understand the situation  
but I fail to see the problem."

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July 21 1989

**FELLOW MEMBERS** Promotion and control of old mans beard in the Wellington region.

A joint approach has been undertaken by Noxious Plants Authorities, Department of Conservation, the Wellington Regional Council the N.Z. Natural Heritage Foundation and other local bodies within the region for a co-ordinated approach to promote awareness and instigate control measures to contain and eradicate this plant.

The organisations met and set up a working party to assess the magnitude of the problem and lay out guide lines for the utilisation of all resources available fiscal and manual.

Guide lines set out by the working party were as follows;

1. A central agency for receiving and distributing information was arranged.
2. N.P.O.s were to verify reported infestations and advise on control measures.
3. Information on site density No of plants and topography to be reported and recorded at the main information centre (sample cyclostyled report and return forms were formulated).
4. An information sheet was distributed to all staff members in local bodies informing them of the project.
5. The campaign has been promoted through the local media and soon to be advertised through the televisions central region.
6. A free phone has been set up to receive all queries and complaints which in turn will be referred to the N.P.O.s in that area to verify and advise on control methods and returning control and site data to the central co-ordinating body who will correlate the data to form an overall map of infestations throughout the area.
7. New posters and brochures have been printed and are displayed in Schools, Libraries, Councils and other public places.
8. The establishment of a code of practice for chemical/physical removal of old mans beard to be developed.

#### SUMMARY.

Despite having some doubt as to the ability of all these departments to work together, all obstacles have been overcome and the project is proceeding swiftly and smoothly with total commitment and co-operation of all parties involved. With the regional overview an accurate picture should emerge of infestation and progress achieved by the control measures applied.

**While government departments wrangle over the ownership of a 100km strip of Northern Southland land, noxious weeds flourishing on it threaten surrounding farms.**

The Southland County Council has already spent \$30,000 on plant control, but much more is required to eradicate the problem.

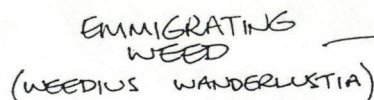
Last November the Railways Corporation denied responsibility, claiming the land was transferred five years ago to the Department of Lands—that government agency also rejects ownership.

Transfer of the Garston line from New Zealand Railways to the Department of Lands and Survey was begun in 1984 at about the same time as the department was being reorganised into Landcorp and the Department of Lands.

An oversight meant the final transfer of the line was never completed and now the various departments are attempting to sort out the ownership issue.

As the bureaucratic wheels turn slowly searching for a solution, the weeds on the Garston line continue to flourish. ~~~~~

July 1989



# Nassella tussock seed 'far from eradicated'

By  
**HEATHER CHALMERS**  
in Rangiora

Fifty years ago, nassella tussock was a major threat to the productive agricultural land in North Canterbury.

Large areas of dense nassella tussock covered Waipara, Waiau and, to a lesser degree, Cheviot. About 17,000ha of land was matted with nassella tussock which had taken over pasture land.

Public concern about the problem led to the establishment of a nassella tussock committee in North Canterbury in 1941. This was followed by the passing of a Nassella Tussock Act in 1946 allowing nassella tussock boards to be established.

Only two such boards were formed in New Zealand, one in North Canterbury, covering the Amuri, Hurunui and Cheviot counties, and the other in Marlborough.

The boards will be abolished in October as a result of local body restructuring.

It is one of many special purpose bodies such as pest destruction boards, noxious plants authorities and catchment boards which will disappear with their functions taken over by the new Canterbury Regional Council.

Nassella tussock was introduced into New Zealand in the early 1900s, probably as an impurity in seed imported from South America.

It is an aggressive weed with a high reproductive rate — one mature plant is able to produce 120,000 seeds. These seeds can lie dormant in the ground for between 20 and 30 years. The nassella tussock has little nutrient value and

its fibrous leaves make it mostly unpalatable to stock.

The North Canterbury board's operations manager, Mr Dudley McLellan, said there was still a large store of seed in the ground in particular areas and the board was dealing with seed from plants grown from years ago.

Nassella tussock is a small plant and is only visible to people with informed eyes, Mr McLellan said.

"One of our biggest problems is convincing people that we have got it, that it's still around."

In fact, the nassella tussock is far from eradicated and in North Canterbury, 400,000ha still has infestations of the noxious plant. The heavy infestations of the past have gone, however, thanks to a variety of eradication methods since the board was set up.

Afforestation of pinus radiata was the first method used but it was principally discontinued after 1950 because of concern over the loss of agricultural land.

Herbicide was used until about 1970, to reduce dense areas of nassella tussock to a grubbable state. The main weapon then became the "old fashioned grubber," Mr McLellan said.

Hand grubbing began in earnest from 1960. It was a very labour intensive job and the board's staff numbers rose as a result. At its peak in 1968, the board had 200 seasonal workers in grubbing gangs working nine months a year; a total of 120,000 hours.

The grubbing gangs started to decline from 1975 as farmers began to find it difficult to meet

the cost of the scheme. The board now employs only 20 people for three months of the year. The board's permanent staff has dropped from 34 to 23 in the last three to four years.

About half the 500 properties infested with nassella tussock in North Canterbury now participate in a hand grubbing subsidy scheme. Under this scheme farmers are subsidised by the board for grubbing on their properties. Farmers still spend a total of 70,000 hours on eradication a season.

"So it has turned right around from us doing the job to farmers doing the job," Mr McLellan said. Board staff now mainly supervise the hand grubbing subsidy scheme.

The board is funded by contributions from the Amuri, Cheviot and Hurunui counties, a Government subsidy and grubbing recoveries. In 1988 the board received \$623,000 in Government subsidy and \$66,000 from the three councils. The Government is gradually cutting back its share, contributing \$296,000 this year and the counties, \$100,000.

Since the board was formed it has spent \$15 million on eradication in North Canterbury. Mr McLellan said this was not a big amount considering the time since the board was established, the work it had done and the amount of agricultural land it had returned to production.

It is not yet known how much funding the board will receive after restructuring but the Canterbury Regional Council was very sympathetic to its cause, he said.

"Any relaxation of control for any length of time could be disastrous. One year's seedlings could be 10 years of problem."

The board has two members each from the Amuri and Cheviot counties, four from the Hurunui County, four from Government departments and up to three co-opted members. It had attracted practical people with a lot of foresight and common sense, Mr McLellan said.

One of the co-opted members is Mr Arthur Healy. When working for the Botany Division of the D.S.I.R. in 1941 Mr Healy made a survey, writing a bulletin shortly after which is still the "Bible" for the board.

The board hopes that once it is dissolved, its role will be taken over by the new Hurunui District Council, an amalgamation of the three contributing county councils, although the Canterbury Regional Council will have ultimate responsibility.

"It is hoped we will more or less remain intact," Mr McLellan said.

31 August 1989

# Manufacturer defends Roundup

A recent Times article headed 'Second Coast TAG meeting hammers common weedkiller' made a number of references to Roundup herbicide that were sourced from a report by David Munroe, U.S. consultant in environmental toxicology and public health.

Mr Munroe has been proved wrong.

Regulatory authorities around the world require comprehensive studies of the toxicology and environmental effect of pesticides before they can be marketed.

Roundup has been subjected to all these tests and falls within the required guidelines.

The conclusions of the World Health Organisation and Food and Agriculture Organisation are that glyphosate 'is of low oral toxicity, low chronic toxicity, is not teratogenic in rats or rabbits, is without mutagenic activity and that there is no evidence of carcinogenicity'.

Therefore Mr Munroe's assertion that 'the most critical data gap is the near total absence of toxicological and environmental fates studies' is not accurate.

On accepted toxicity ratings, the surfactant in Roundup is more toxic than the glyphosate. However, the toxicity of the surfactant is comparable to the toxicity of commonly used household detergents, which really puts into perspective the low toxicity rating of Roundup.

Formaldehyde was quoted as being a breakdown product of Roundup. It is not.

The U.S. Environmental Protection Agency's incident report monitoring system referred to monitors all reported exposures to pesticides in the U.S.

Glyphosate-based products accounted for 35 of those incidents reported over the 14 years monitoring has been carried out.

None of these exposures were life threatening, and the majority - eye splashing - were treated locally and discharged.

The low incident rate or lack of any reported severe or complicating symptoms point out the very low risk of



adverse health effects occurring as a result of accidental exposure.

Environmental and toxicological studies have been carried out by a number of organisations world-wide and all conclude that Roundup is of low toxicity.

It is of concern that the Rodney County Council is expected to form its opinion on herbicide and pesticide use based on misinformation.

**Murray Willocks,  
Product Manager,  
Mansanto.**

*R & W Times, Tuesday, August 15, 1989.*

## ARA to take on Shore pest

North Shore local bodies are getting together to battle noxious pests — both animal and vegetable.

The area's transition committee has accepted the Auckland Regional Authority's offer to take over the job of controlling the area's pests — especially opossums.

While the North Shore has its own noxious plants authority, administered by Takapuna city, it has no authority to deal with the increasing opossum problem.

The ARA plans to deal with noxious plants and animals.

Birkenhead city's opossum trapping contractor catches about 100 a month, and Northcote is investigating a similar scheme.

Coastal pohutukawa trees are being severely damaged by the pests.

*Auckland Star, Wednesday, September 6, 1989*

# Spray causes alarm

Waikato county residents who believe chemical spraying affects their health may soon be able to receive notification when spraying is to take place in their area.

The Waikato District Noxious Plants Authority, which covers the Waikato county area this week decided to consider notifying individuals particularly concerned about chemical spraying if spraying was to take place near their property.

## Individuals notified

The authority cannot afford to let every household know when such operations are scheduled, but it will consider informing people who register a particular concern.

Councillor Bob Dawson raised the issue, saying he had been approached by a neighbour who believed his health was ad-

versely affected with side-effects from spraying.

Residents received information about operations such as power cuts, and in light of recently-reported public concerns about chemical spraying, some system to warn people when spraying operations were scheduled for their area could be useful,

said Mr Dawson.

Noxious plants officer David Fullerton said providing notification to every household would raise the costs associated with spraying operations.

"To deal with the issue on a wholesale basis would make the operation too costly," he said.

However, low numbers

of individuals could be notified by telephone before spraying operations took place, he said.

"If individuals, rightly or wrongly, believe they have a problem with spraying we can accommodate them."

When a contractor was about to spray an area, people who had registered their concern with the county about chemical sprays could be contacted by telephone, said Mr Fullerton.

## Kikuyu spread alarms

A grass species which could prove toxic to stock if eaten in large amounts is spreading through the Waikato, the Waikato District Noxious Plants Authority heard yesterday.

Waikato County councillor Bernie McGovern told the plants authority meeting that kikuyu grass was spreading through the Waikato, with three times as many infestations now as there had been about five years ago.

"It's spread three-fold in the past four to five years," he said.

While stock appeared to thrive on kikuyu grass at first, it could prove toxic if eaten in large amounts, said Mr McGovern.

The grass suited places like Northland where it could be used to hold together erosion-prone sandy beaches, but it would be detrimental to the Waikato.

People should take action to spray it before it got a hold, he said.

"If it can be approached at the present time it can be stopped," said Mr McGovern.

Noxious plants officer David Fullerton said kikuyu grass was just one of many species which were causing problems, and increasing, in the Waikato.

Woolly nightshade, inkweed, and pampas grass were among other weed pests, he said.

Warmer temperatures, whether linked to what was claimed to be the greenhouse effect or not, were the likely cause, he said.

WAIKATO TIMES, THURSDAY, AUGUST 31, 1989

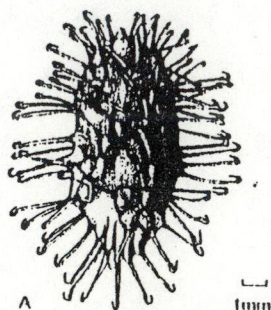
BATHURST BUR  
(*Xanthium spinosum*)

This South American weed has spread widely throughout the world and has long been established in Australia, notably at Bathurst in New South Wales, and was introduced into New Zealand in about 1890. This plant is common in the North Island, especially in the Auckland Province and on the east coast where the majority of the maize seed is produced. This weed is spreading into the South Island, the seed being a contaminant of maize seed, and is found in the Tasman and Marlborough districts and infestations have been found in maize crops as far south as Canterbury.

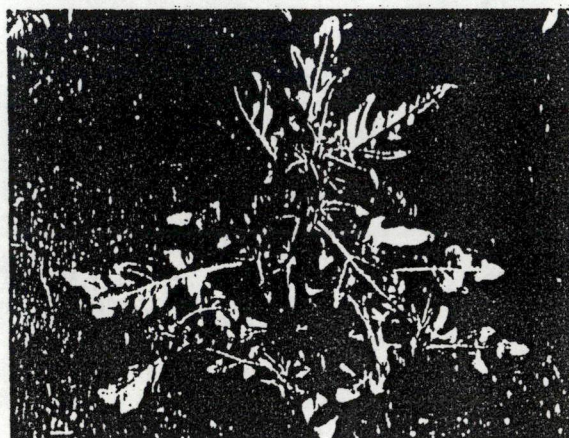
It is a shrubby annual up to one metre tall, with uniform botanical features, stems upright, usually well branched and each joint or node of the stem is studded with sharp spines arranged in opposite groups of three. Both the stem and underside of the leaves are whitish. The leaves are lance-head shaped, cut into three lobes, the central lobe being the longest. Flowering occurs December - April, and are greenish, inconspicuous, in clusters in the axils of the leaves, and the seed is encased in a very hard oval burr thickly studded with hooked prickles.

It is not a competitive species in pasture and therefore pasture improvement offers the best method of control. Chemical control is best obtained by spraying young plants in established pasture with Hi-ester 24 - D at the rate of 1.5 litres a hectare. Young pasture can be sprayed with MCPB at 6 litres per hectare.

In maize crops Bathurst bur can be controlled by boom spraying with Versatill (clopyralid) at the rate of 1 litre per hectare. Mature plants should be hand grubbed and burnt.



Fruit of Bathurst bur



Bathurst bur plant

# Wild Garlic (*Allium vineale*)

BOTANY SERIES

No. 2

## The problem

Wild garlic is spreading in Victoria. Its offensive "garlicky" odour taints agricultural produce, lowering its quality and value.

Wild garlic "heads" contain a large number of bulbils which may be harvested with cereal grains. Being of very similar size to the grain, the bulbils cannot be effectively separated. Under the receival standards of the Australian Wheat Board wild garlic is classed as a contaminant for which there is nil tolerance. Contamination of wheat with wild garlic bulbils will lead to rejection at the silo. Other grains so contaminated will probably be rejected or incur dockages.

When stock eat contaminated grain, hay or pasture, their products such as milk, meat or eggs will be tainted.

Rejection of exported produce may occur if it is contaminated by wild garlic.

Wild garlic is difficult and expensive to eradicate. Control takes several years.

## History

Wild garlic originated in Europe, North Africa and Asia Minor. It now causes problems in most temperate regions of the world. It was first proclaimed a noxious weed for Victoria in 1960.

## Distribution

Small infestations are widely distributed over much of Victoria. The most serious infestations are at Castlemaine, Daylesford, Dimboola, Dunolly, Geelong, Maryborough, Ouyen and Woomelang. Other infestations occur near Bendigo, Cranbourne, Donald, Hamilton, Kyneton, Port Fairy and Werribee.

## Spread of Wild Garlic

Movement of contaminated hay, grain and machinery can spread bulbils and seeds of wild garlic. Animals can spread seed in their faeces. Water can carry seeds or bulbils to new areas.

The planting and transporting of contaminated wheat has greatly contributed to the weed's wide distribution.

## Description

Wild garlic is an erect, strong smelling perennial. Stems are cylindrical and unbranched. Leaves are slender, hollow, almost cylindrical but channelled on one side, emerging from the lower half of the stem. Flowers are white, pink or greenish. Seeds are infrequent, about 2 or 3 millimetres long, black and flattened on one side. Stems may produce clusters of aerial bulbils and/or flowers. Individual bulbils are similar in size and shape to wheat grains, being oval, smooth and shiny. Bulbils sometimes germinate in the head. Up to six bulbs are formed at the base of the plant around the old bulb. Some bulbs have soft white shells, others have hard brown shells and can remain dormant in the soil for several years. Diffuse fibrous roots make the plant difficult to pull up.

## Life Cycle

Wild garlic bulbs and bulbils sprout after the first autumn rains. During winter and spring, the leaves and stems develop while underground bulbs form at the base of the plant. Heads are produced in late spring through to summer. Most heads produce bulbils only, but some heads produce both bulbils and flowers. Some seeds are formed by the flowers but reproduction by seeds is of minor importance. When the aerial parts of the plant die in late summer the bulbils are shed on to the ground.

## Control

Wild garlic is well adapted for survival as it has three effective methods of reproduction – aerial bulbils, bulbs and seeds. Dormancy of some of the underground bulbs and variation in time of sprouting make control difficult.

Control is most likely to be economically feasible on small patches. Do not allow wild garlic to take over large areas before starting a control programme.

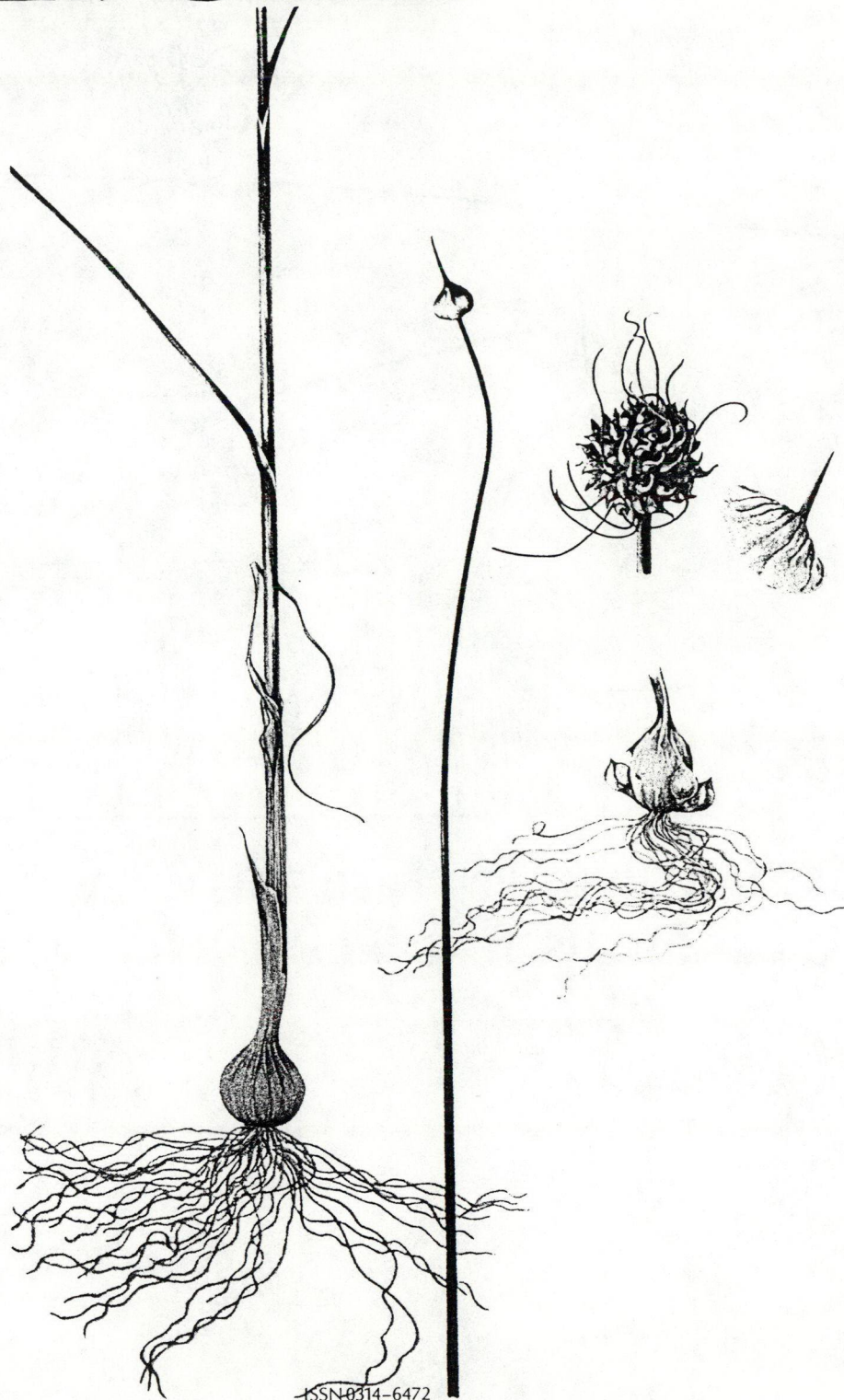
A main aim of control should be to prevent formation of aerial bulbils and seed to avoid further spread of infestations. Heavy grazing by cattle or especially sheep achieves this but does not kill the underground bulbs. Frequent tillage in late autumn and spring reduces the food reserves of the bulbs but care must be taken to avoid dragging bulbs to new areas.

A number of herbicides are recommended for wild garlic control, but will kill all legumes and may prevent their re-establishment for 12 months or more. Grasses are normally unaffected and will re-establish quickly.

Follow-up spray treatment will be necessary to control wild garlic regrowth over the next few seasons.

A management programme incorporating grazing, cultivation and chemical control extending over at least five years should eradicate the weed.

# Wild Garlic



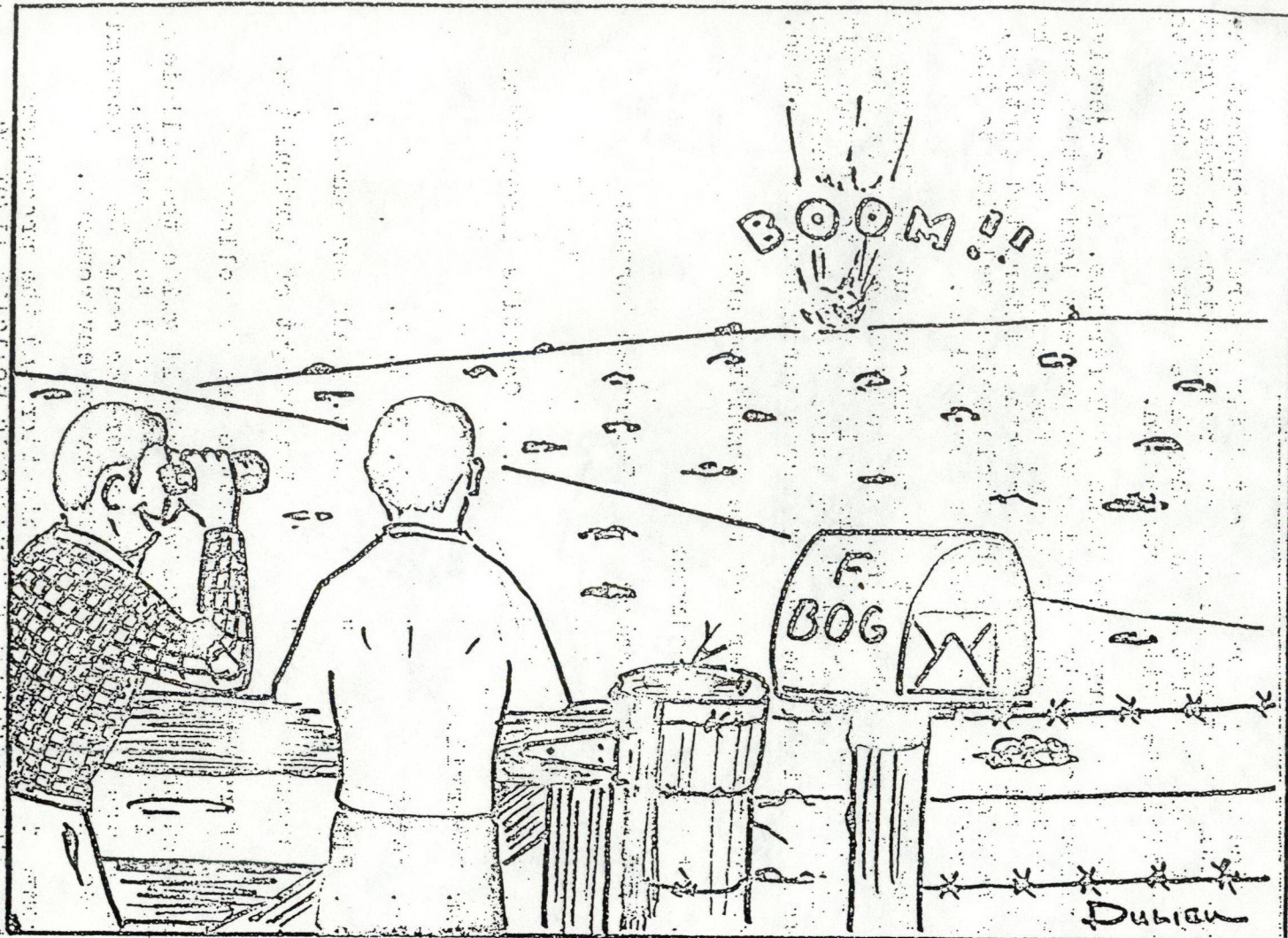
Painting: Betty Conabere

ISSN 0314-6472

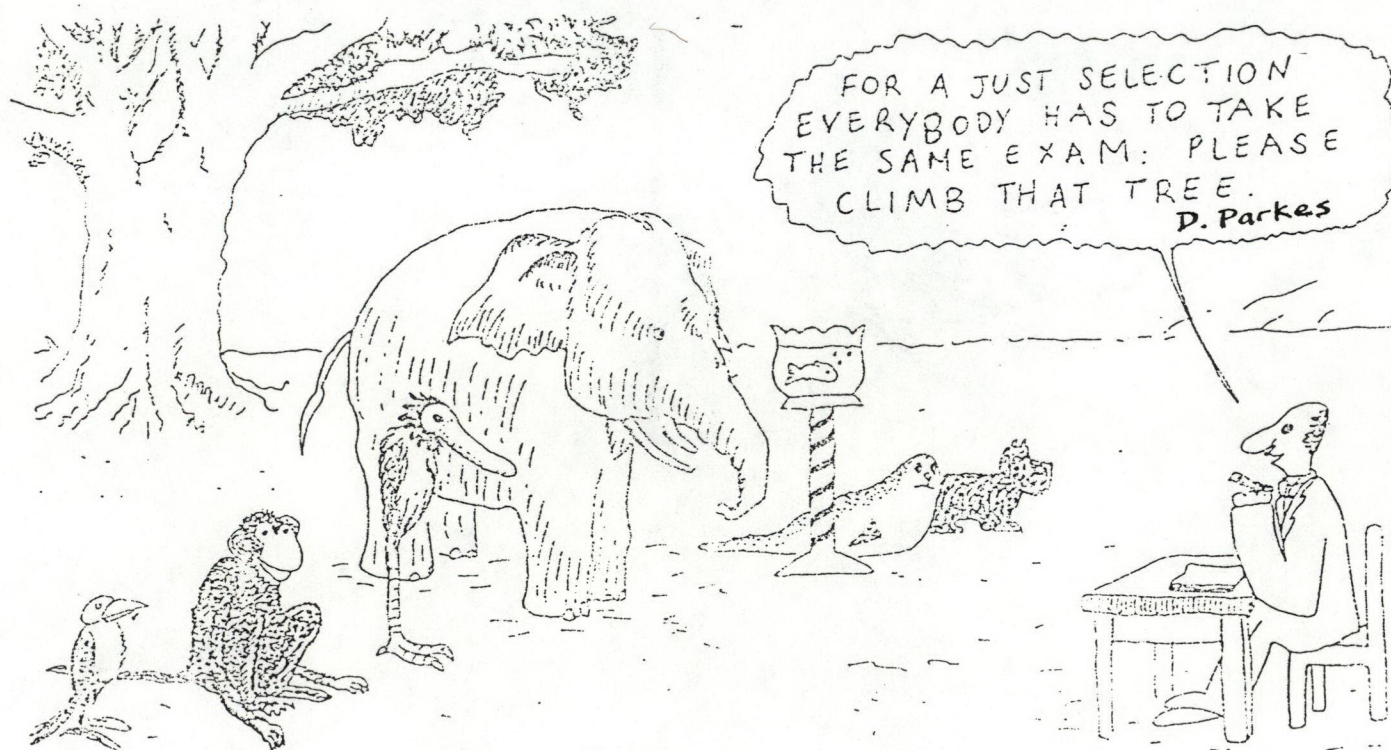
Pamphlet No. 85

September 1981

Department of Crown Lands and Survey, Victoria



"I'll SAY ONE THING FOR FRED - HE'LL TRY ANYTHING  
TO GET RID OF THAT OLD-MAN RAGWORT!"



C.O.P. ? — an N.P.O's nightmare before the exam

# The Institute of Noxious Plants Officers Inc.

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RICHMOND

## SUMMARY OF SUBMISSIONS - MAF DISCUSSION DOCUMENT

### REVIEW OF WEED AND ANIMAL PEST MANAGEMENT LEGISLATION

1. One specialist Act needed, in two parts. MAFQual to administer nationally gazetted pests, with Regional Councils free to declare such regional pests as they see fit, within the criteria laid down by a nationally representative body.
2. This legislation must contain powers of entry and inspection, enforcement including the authority to do work and recover costs and the securing of debt as a charge on land, and penalties for non-compliance.
3. At national level, intervention should be taxpayer funded. At regional and local level intervention should be funded by rates. Exact funding ratios below national level should be a matter for district and regional negotiation.
4. Regional pest classification criteria to allow for eradication and/or containment of some species, and boundary clearance of other aggressive but more common species, to satisfy community requirements.
5. The Act must bind the Crown. D.O.C. responsibilities must be shouldered in equitable manner.
6. The Act should more properly be called "Land Protection Act" or similar title, to reflect the protection it only will give to all land from invasive weed and animal pests.
7. Provision is needed to allow Regional Councils to devolve powers to District/City Councils for service delivery functions. Regions must retain policy, monitoring, audit and accountability functions.
8. Industry-based, specialist technical training to national certification and registration standard, must be mandatory for all officers involved in service delivery work. This training is of great benefit to central, regional and local government, so therefore should be jointly funded by those groups. No exemption what-so-ever should be made in the awarding of qualifications. Central government must assume responsibility for re-establishment of a nationally representative committee for pest control training.
9. Conservation values and environmental concerns to be adequately accommodated within the legislation and criteria for pest classification.
10. Responsibility for pest control/eradication on all lands, including roads, lies with the occupier.

# The Institute of Noxious Plants Officers Inc.

## COMMENTS ON DISCUSSION DOCUMENT

Although the document contains many commendable suggestions and has a number of excellent policy recommendations - notably the creation of a single, specialist, Act - the Institute is disappointed at the lack of detail overall. For instance, the composition and role of N.A.S.S. is not fully explained despite the service already being in existence. Also the inclusion of the N.A.S.S. pest profiles that have been completed would have given an indication as to MAFQuals assessment of such factors as environmental and economic impact, risk to primary production, biological characteristics, etc.

The Institute agrees with the documents stated aspects of the New Zealand situation to be considered when pest management policies are to be formed, in particular :

- 4.1    b) The heavy reliance on exported primary produce and the linkage between production/market access and pest concerns.
- c) The unique biota, habitats, and pest concerns and their vulnerability; the protection of native plant and animal communities.
- d) The lack of respect shown by pests towards political or administration boundaries.
- e) The dynamic state of biological knowledge and technology.
- f) The principles common to pest management irrespective of the focus of the intervention.

The acceptance that "a standardised process and response mechanism is impossible" (4.2) shows awareness of the complexity of pest management programming.

In Section 4.3.1 the most likely sources of proposals to intervene in respect of a particular pest - local authorities and private individuals - are overlooked, although an oblique reference to the "community" is made. Likewise in Section 4.3.2, the most common forms of intervention are also not mentioned. These include boundary protection enforcement for common pests and "target" eradication programmes for less common but aggressive pests in certain areas (e.g. Class B target plants, rooks).

Indeed, this section is symptomatic of MAFQuals past and present performance shortcomings in the administration of pest management schemes, i.e. lack of consultation with local authorities and the community, and aversion to making decisions (particularly regarding classification) for local application.

However, the statement in section 4.5 "all concerned with pest management need to think and behave proactively, skillfully, synergistically and cost effectively" is indeed, well put.

Section 6.1 contains good criteria for compiling information on likely pests and potential pests. The Institute is concerned however, on several points.

1. How is the necessary information being gathered? Is data from resource organisations other than MAF (e.g. DSIR Botany Division, DNPAs, APDC, DOC) being used? Or can MAF source all of this data accurately itself?
2. What weight is being given to those considerations of an environmental nature, or affecting conservation values? The Institute is extremely concerned that, through reasons of cost, some environmentally damaging pests may be left out of the reckoning.
3. Item 6.1 (e) raises the issue of cost. Costs vary widely depending on who undertakes the control work. Estimates of control costs can be most inaccurate when they are collated at national level. Control costs are normally both cheaper and more accurately assessed when the work is being conducted from a local base.

It may be intended that the profiles be produced only for likely pests of national importance. Section 6.1 does refer only to ".... the national level, within the area of MAF responsibilities ....". However, any list of nationally gazetted pests will obviously affect the size of corresponding regional lists. Therefore it is essential that the national policy, profiles and decisions be made public before regional management policies are formulated.

Section 8.2 refers to the 1987 MAFQual discussion paper on noxious plants administration, and in particular to one of its recommendations "control of other weeds should be at the discretion of individual land or water managers. If groups of land or water managers wish to take concerted action against weeds, then this should be encouraged ...." etc. This ill-defined suggestion was justifiably dismissed by most other interested parties. Most individual land managers lack the information to make reasoned long-term decisions regarding weed management and in any case the great majority make their decisions based only upon direct economic grounds, ignoring wider issues such as overall weed spread, environmental and conservation values, and the economic implications for other groups. The community as a whole demands that standards be set for nil or low weed infestation levels and that enforcement should be part of the means by which these standards are maintained.

The general thrust of the submissions received as stated, "that the collective action needed to limit the spread of weeds would be best achieved if goals and areas of responsibility are clearly defined and if all concerned had strong commitment to the goals," is clearly agreed with. Local authorities have to date shown the strongest commitment of any of the involved parties and this has been evidenced by their willingness to fund entire programmes, their initiation of control programmes and changes in weed status, and their effectiveness, all in the face of evaporating central government assistance. When compared to the rather poor performance of the Class A eradication management

schemes (Cape tulip, water hyacinth, Johnson grass and Salvinia sites not under adequate surveillance), weak policy (fitches now released and established in the wild), and compromising management decisions (knowingly allowing grain contaminated with Johnson grass into New Zealand), it is apparent that commitment becomes greater the closer an organisation is placed to the actual problem.

Section 8.3 refers to pests of national significance as "those whose potential effects extend beyond localities and regions". Application of this criterion would exclude the present Class A aquatic noxious plants, which threaten probably no more than three regions. Perhaps only Cape tulip, Johnson grass and Opposum would satisfy this criterion. However we are confident that eradication schemes for all present Class A plants could be easily and cheaply administered at Regional level. Conversely, a number of pests with lesser or no current status might satisfy every criteria for inclusion as pests of national significance, e.g. Manchurian rice grass, common wasp, nassella tussock.

The statements regarding training are endorsed by the Institute. Training of professional pest control officers must be mandatory, nationally co-ordinated, to a national certification and registration standard, and be industry based. We believe that for Noxious Plants Officers, the Certificate of Proficiency currently satisfies the job requirements to a good intermediate level, although the correspondence course should be updated more frequently. Central government accepts the Certificate of Proficiency as the necessary qualification for all individuals involved in tendering for and carrying out of national pest eradication/surveillance schemes.

It is agreed most emphatically with the documents statement "that pests of local significance should be handled locally, for reasons of accountability, flexibility and efficiency". This is a key principle, reinforced by the R.M.L.R. dictum that responsibility for decision making shall be close to the people directly affected by these decisions.

#### Specific Pest Definitions and Criteria

It is disappointing that these definitions are offered only as suggestions rather than as firm proposals, as in essence they are very good indeed.

In particular the phrase ".... or capable of causing ...." is noteworthy. Pests must be assessed and qualified immediately they appear, not after they have become established and following public pressure for action. In Section 9.2 (c) "a high likelihood of effective geographical containment" would need specific definition in each case, with very firm management policy and subsequent high level of enforcement and surveillance needed.

Section 9.2 (d) hints that if a regional programme could eradicate a pest (regardless of its nature) then no national programme would be considered. This is a sound criterion and again fits R.M.L.R.

principles, which are themselves supported by the Local Government Commission's requirement for policy creation at local level. The "ultimate criterion" also alludes to this principle.

Placing a quantitative value on conservation items will prove extremely difficult. It is recommended that DOC have significant input into any decision made at this juncture.

Intervention proposals must always be assessed as much with the long term future in mind as the present state of pest density or spread. Therefore intervention "only when the benefits outweigh the costs" must take into account the future and long lasting benefits of that pests' eradication or containment/control.

The limiting criterion that, for regions, "the concept of controlling only pests of limited regional distribution but with the potential to spread widely ...." would not be acceptable to any regions, districts or communities, and in any case runs contrary to the "local pay-local say" principle espoused by this and other documents. Local communities will always demand a measure of neighbouring boundary protection for the aggressive and expensive-to-treat pests such as gorse. This matter warrants further discussion, even given that Regional Rural Services Committees will surely adopt boundary clearance programmes for some common pests. Of course some common pests currently declared noxious plants will probably disappear from some future management programmes (e.g. blackberry, barberry).

Spillover control effects do have to be considered in every proposal for intervention but they are seldom, if ever, likely to present barriers to such intervention. A pest in any one region is hardly likely to be of nett benefit in any other, but of course the possibility must always be considered. Consultation between regions appears the logical course, not legislative constraint.

#### Responsibilities and Roles

The Institute agrees with the principle stated in Section 10 "a land occupiers pest control objectives need concern no-one else unless the pest control, or lack of it, has spillover effects which could significantly affect neighbours, district, region or the nation." The Noxious Plants Council identified with this principle, and adopted sound sensible policies accordingly, i.e. boundary clearance for common plants adjacent to clear land, "target" eradication plans for aggressive but uncommon plants, "monitor" status for plants unproven in terms of invasiveness, etc.

Collective action is needed to both encourage and compel occupiers to adopt reasoned pest management practices. Decisions on control objectives are, indeed, best taken at the level closest to the community affected. This document's contention that local government should both manage and fund local control programmes is irrefutable. The integration of pest control programmes with other land management programmes is a vital issue and one that is clearly best addressed by regional government, which has catchment and planning responsibilities. Indeed, the connection is so all-encompassing as to render the name of the proposed legislation too limiting in connotation. A better name might be "Land Protection Act". It must be borne in mind that for all the

land and water in New Zealand outside of Crown ownership (and under the administration of DOC) there is no-one else to protect that land from invading animals and plants but the local weed and pest control staff. The new legislation must be seen by the public to address the conservation ethic which is becoming ever more prevalent in New Zealand. The Act must be created to satisfy not just the demands of the next five or ten years, but those of a generation of New Zealanders.

Section 10.1 states that central government "often has the only access to the expertise which can predict whether a pest is likely to become a major problem in the future". There has been little evidence of this attribute manifesting itself in MAF weed policy to date and it would be erroneous to assume that MAF is the only central government agency with this expertise. DSIR Botany Division staff have produced, and continue to produce, excellent data on adventive plant species. Institute members refer to both DSIR and MAF for specialist advice on plant invasiveness. However the conclusion that central governments main pest policy should be directed at plants of very limited distribution is sound.

#### Regional Pest Management Plans

The concept of regional resource management policies and mandatory pest management plans is excellent. Pest management plans must be mandatory, and a regulatory approach is vital to the success of any efforts at a local level. The integration of pest management into resource and environmental management is best done by way of regional policy statements. These statements must commit the regions to a high standard of :

1. Environmental and conservation protection.
2. Neighbouring boundary protection for widespread pests that are invasive to a marked degree.
3. Eradication measures for those pests which can be eradicated.
4. Advisory service to the community on pest control methods and their impact.
6. Community awareness and education, by way of publicity and back-up.
7. Achievement of objectives within specific time frames.

It is to be hoped that management plans commit regions to act on policy in much stronger fashion than did district programmes. District programmes as previously approved by MAF acted more as statements of intent rather than as objectives. Time frames for achievement must be written into all management plans where appropriate.

The details as stated for probable management plans are very good. They stress accountability, objective-setting and achievement, cost-effectiveness and follow-up surveillance.

Criteria for regional classification will need to be very tight and specific, so that all control programmes are sustainable. Aspects which must be considered include :

1. Classification of some pest species for prevention of sale, distribution etc.
2. Consultation with community, user groups.
3. Varying requirements for different areas within regions, e.g. urban versus rural demands.
4. A full range of control/eradication options, including integrated pest management and biological control.
5. Statutory powers to be used in cases of advocacy failure.
6. Surveillance capability.

#### Some Other Aspects

The Resource Management Planning Act and the proposed pest management legislation must bind the Crown. Crown agencies must be treated exactly equally as private individuals, and for that matter, local authorities also. Although D.O.C. manages very large tracts of land, this does not place them apart from organisations such as Timberlands and Landcorp. To alter the rules for one body on account of cost is both inequitable and setting a dangerous precedent. In any case the proposition does not fit the pest problems that currently exist, at least as far as weeds are concerned. Common weed problems would only be subject to boundary protection measures (which are inexpensive to administer) and those weeds growing further inside D.O.C. lands would be of no concern to any other authority. Targetted weed species would only exist in low densities or in small areas (if at all) and in any case would usually present negative conservation values of their own which require addressing.

It is thoroughly unreasonable to exempt only a central government agency from the provisions of legalisation, merely on the premise that money could be saved by this move. We are sure that D.O.C. would not favour any move towards a lower standard of land management, especially considering that D.O.C. lands are more at risk from pests (e.g. Clematis vitalba, wild ginger, wandering jew, opossums, buddleia, common wasp, spartina) than they are from anything else. Inequitable treatment would also be bad for D.O.C. from a public relations viewpoint and would indicate to the public that central government did not consider conservation a priority issue.

The statement in Section 11 "The extent of intervention should not be written into law, but must be flexible to allow for changing circumstances" to fit changing objectives, is somewhat ambiguous. There must be statutory enforcement back-up in the event of occupier failure, but management plans should state firmly the prior steps to be taken by regulatory authorities to encourage voluntary compliance. Such steps should include :

1. Initial publicity, advising the community of the hazard posed by the pest and the probable cost/benefit equation, identification data.

2. Availability of free advice concerning all control options, including costs.
3. Individual contact with occupiers firstly on an "encouragement to act" basis, rather than on an enforcement basis. Also that this contact be on an overall area basis (e.g. every property in a given Ward) or an overall pest species basis (e.g. every property with nodding thistle) so that the authority may be seen to be acting evenly and impartially.
4. Control by enforcement as a stated last resort.

Most DNPAs presently act in this fashion but the community has a right to know why certain actions are taken and that they are taken equitably.

The comment in Section 11.3 regarding nassella tussock meeting the criteria for national pest classification is endorsed, as is the suggestion that shared policies and costs will be necessary to ensure containment.

#### Policy Implementation

It is not considered appropriate for central government to have input into regional policy implementation, other than a "call in" function for the collating of every regions pest situation. The "user pay - user say" principle dictates that both advocacy and policy should be driven by the dictates of regional communities.

Service delivery for national pests is most effectively done by locally based trained staff because :

1. The policing of policy and management strategy and the carrying out of control work overlap to such a marked degree that properly trained staff can fulfill both functions simultaneously and continuously.
2. Only territorial local authorities have instant access to current property information (ownership, occupancy, boundaries, legal description, value and subdivision data).
3. Local placement means drastically lowered travelling and accommodation costs, easier co-ordination of effort and less time wastage taking into consideration factors such as weather, availability of occupiers when needed, local contractor hiring, mapping, accessibility, other local knowledge.
4. Fully trained and capable staff are already based at district/city level.
5. Only locally based staff are likely to discover new sites, other than those reported by occupiers. This reporting is almost always directed to known personnel at local level. Many occupiers in fact knowingly neglect to report infestations through reasons of their own. This leaves only local staff to act in detection work.

6. Occupiers and the community prefer local contact and co-ordination. This enhances advocacy aspects.

Management of national pests will require nationally allocated funds for control work and administration, rights of access and inspection, audit and penalties for non-compliance. It is not recommended that any costs for the management of national pests be imposed upon occupiers, if rapid progress towards eradication is the goal. Maximum co-operation, particularly regarding reporting of infestation sites, is the key to progress in this field and the imposition of occupier-funding would significantly hinder and possibly even prevent achievement of the ultimate goal.

The subject of compensation is well put in the document. We do not believe that any useful purpose would be served by the establishment of compensation provisions. Indeed there would be a real prospect of compensation leading to "pest-farming".

Service delivery of regional pests is best handled, again, by trained staff employed at local level, for the same reasons as outlined for national pests, but with the added factor of direct accountability. Regional staff based in local offices would not succeed over time because of poor direct supervision of officer activities. Service delivery based solely from Regional offices would not be satisfactory for the following reasons :

1. Service to outlying areas would be lessened dramatically and in any case would be expensive in terms of travelling costs.
2. Occupiers would not have ready access to staff.
3. Staff would not have access to property information, as described above.

Clearly, occupiers must be responsible for pest control work in most instances, because :

1. Pest problems are only a part of the entire land management scenario, each factor influencing the other. Only occupiers can have control over all factors, therefore they should be responsible for each individual factor.
2. It would not be fair to have outside organisations do work and impose charges that in most cases would be costlier to occupiers than doing the work themselves. Questions of efficiency would immediately arise, especially considering the considerable beaurocracy that would inevitably be created.

Shared effort methods would also be inefficient. Subsidies create false impressions of true cost and often waste money and other resources. It is an inescapable fact that in the large majority of cases, occupiers are the cheapest and most efficient managers of pest control work on their own land.

Regions will require clear-cut policies for intervention into pest management, particularly as a result of community demand. Inspectorate, advisory and enforcement functions will need to be funded. Considering the equitable nature of rating and the fact that District Councils wish to retain and fund pest control activities, also that these activities benefit the entire community, then funding by rates is the preferred option.

The Institute agrees with the list of fields of expertise needed as stated. The benefits to central government in having access to trained specialist inspectors/operators locally based are obvious. Joint funding for training would give central government a nett positive return on investment. It is recommended that MAFQual, the NPC Training Committee, INPO and the Local Government Association discuss cost-sharing of future training. Involvement of highly trained NPOs in a number of tutoring positions could cut costs substantially. Training as stated earlier, must be industry-based. This ensures that it is practical, up-to-date, technical, wide ranging and cheap to administer. It must be borne in mind that the Local Government Training Board is to be abolished in December 1989 so alternative arrangements need to be put in place now. The discussion documents comments on training are indeed excellent.

The principle of regional or local government charging for advisory services offered by staff, opens up the questions of effective double charging, as all occupiers are already subject to rates. Because much of the advice is sought for reasons other than commercial ones, it is not felt that charging for advice would be either fair or practical. Conservation aspects can never be properly quantified as they have a value beyond mere dollars.

#### Legislation

The obvious requirement is for a single Act, appropriately named to encompass the pest management aspects of all land and water in New Zealand. This Act should be of two parts, one concerning the responsibilities, rights etc of the organisation charged with the administration of national pests, and the other concerning the responsibilities, rights etc of regional government in its administration of regional pests. We believe that MAFQual should administer the national pest part of the Act. Each part of the Act should include its own set of criteria within which MAFQual and regional government can declare its own pests, subject obviously to the proviso that a pest cannot be declared both a national and regional pest. Regional government should be involved in the drafting of the proposed Bill, not merely at the Select Committee stage.

The Act must contain powers of entry, enforcement, penalties for non-compliance and the authority to undertake work and recover costs by way of securing debt as a charge on the land. It is recommended that "occupier" be better defined than is previously the case in the Noxious Plants Act 1978. Furthermore, it is recommended that registration of charges on land be by way of a standard statutory land charge form, attached as a schedule to the proposed Act. Service of notices

on land owners outside of New Zealand is difficult under present legislation so this aspect should be carefully addressed. The Act must bind the Crown. Regional Councils should have a legal responsibility to inform MAFQual (or whomever) of property occupancy changes where they concern national pests.

The advantages of one Act, rather than two, include the ability for pests to be reclassified national or regional as necessary without delay. Penalties, powers and regulations will also be similar. Officers will need to be warranted, for public and occupier protection.

The Act may need to spell out specific emergency response measures and powers, in respect of national pests. In this regard NASS may need to adopt a "Civil Defence" styled plan, to include staff from MAFQual, Regional and District Councils.

Because there will be a clear need for regional standards to be maintained, and for these standards to be consistent between regions, it is imperative that a national representative co-ordinating body be formed. This body should consist of representatives from MAFQual, D.O.C. and Regional Councils, and would assist regions in ensuring that :

1. equitable Regional Pest Management plans are implemented, and that these plans are consistent with those from other regions.
2. guidance is being given in classification.

Conversely, the national body will assist MAFQual in ensuring consistency amongst the Regional Councils and making MAFQual aware of the various and different Regional problems. In this regard the Institute thoroughly endorses the resolution adopted unanimously at the 1987 Lincoln Weed and Pest Administration Seminar, which called for such a national body to be formed.

In conclusion, the Institute believes that the key link in the pest management chain is the Rural Services Committee. This Committee will not only set most policy but it will account for effort and expenditure.

Our last word is a reminder that in both MAF-sourced discussion documents, no mention has ever been made (or worth assessed) of the "pre-emptive" work that is done by locally based officers, eliminating many small pest outbreaks at the first sign of appearance, without fuss or fanfare, in a very cost efficient manner (to the local community). This alone is reason enough to confirm the need for stand-alone Regional policies, with service delivery offered to a good standard at District or City level.