

11 October 2011

Submission on proposed Environmental Reporting Bill
Ministry for the Environment
PO Box 10362
Wellington 6413

Dear Sir

The Mid Dome Wilding Trees Charitable Trust would like to make a submission on the discussion document "Measuring Up: Environmental Reporting" released August 2011.

The Trust supports the aims and objectives of the Environmental Reporting Bill for New Zealand and would like to make a specific suggestion to include monitoring the impacts of wilding conifers and their management as part of national State of the Environment reporting.

Our proposition

The Trust suggests that the extent and measured impacts of wilding conifers could be used as a key indicator of the state of the environment over extensive areas of vulnerable land in both the South (805,000 ha) and North Islands (approx. 300,000 ha).

Standardised information about wilding tree risks and management collected and reported regularly from active wilding conifer work programmes across New Zealand would provide valuable insights to a range of important environment parameters. These would include indigenous biodiversity, pastoral production, water yields, recreational use and social values, especially in the high country and drier inland areas of the country.

Issues posed by wilding conifers

There are strong indications that wilding conifer spread is increasing in spite of significant control efforts in many affected parts of New Zealand, e.g. Central North Island, Hawkes Bay, Marlborough Sounds, Hanmer Springs, Craigieburn/Flock Hill, Lake Coleridge, Mackenzie Basin, Queenstown, Northern Southland - Mid Dome, etc.

Wilding conifers have the following impacts:

- they disrupt and displace indigenous biodiversity – by invading native tussock grasslands, shrub lands and wetlands and even some types of native forests;
- they reduce productivity of extensive pastoral farming by reducing grass production and by imposing ongoing control costs to remove unwanted trees and to stop further spread;



- they reduce the attractiveness of commercial forestry by contaminating potential new plantation sites and reducing the productivity of existing plantations;
- wilding conifer infestations once they become established as dense cover within a catchment significantly reduce water yield. This will become a critical problem in rain-shadow areas of New Zealand as demand for water increases;
- wilding conifer forests degrade natural landscape values by replacing New Zealand's unique indigenous character with a foreign one akin to that of Europe and North America from where these trees originate;
- affect social and recreational values - particularly tramping, hunting, fishing, mountain biking, etc.

The rationale for using wilding conifers extent and impacts as a key environmental indicator is that ongoing wilding tree management activities over large areas of New Zealand will generate a considerable amount of data. This has the potential to provide a range of information relating to the state of land and water resources and the biodiversity values. As such it could be readily collated to help build up a national picture.

This could be achieved if State of the Environment monitoring set national data requirements and standards for the collection and reporting for agencies, organisations and land owners involved in wilding conifer management. This would require them to regularly provide specific information from their programmes which could involve:

- area of land being managed under a programme;
- conifer species present and their measured distribution and densities;
- values being impacted by wilding conifers – biodiversity, economic (primary production), water yield, social, cultural, etc quantified where possible;
- areas of land where control or other management is being undertaken and measures of the effectiveness of the intervention (i.e. inputs and outputs);
- regular monitoring of specifically defined attributes which can be used as key indicators to measure progress toward desired programme outcomes. (Currently national research is being undertaken to develop a set of standard biodiversity monitoring indicators).

Recording and reporting this information would not only contribute to State of the Environment monitoring but would also ensure that programmes made provision to record important information about wilding conifer distribution, density and risk etc. This is an essential element of good work programme management.

Background

The Mid Dome Wilding Trees Charitable Trust was formed in 2006 as a community based group committed to the protection of indigenous plant cover on the high country in southern

New Zealand and specifically to address the threats posed by wilding conifers spreading from planted stands on Mid Dome in Northern Southland.

The Trust's primary focus is the funding and management of its 12 Year Wilding Tree Eradication Programme at Mid Dome. It also recognises the need to manage the threats posed by wilding conifers across vulnerable areas of native grasslands, shrub lands and forests throughout New Zealand. As such it has taken an active role in promoting the need for more resources for this widespread and growing problem. In this regard the Trust has supported the Ministry of Agriculture and Forestry's recent initiative to nationally co-ordinate wilding conifer management as part of its Future of Pest Management Plan of Action programme.

One of the initial findings of this MAF initiative is the lack of access to information at a national level about the presence of wilding conifers, their current impacts and the future threats they pose to vast areas of land across New Zealand. Setting national reporting requirements and standards for wilding conifer management would not only close this information gap but would also potentially provide important information about the State of the Environment.

We trust this submission is helpful.

Yours sincerely