

## **Submission to the Mackenzie District Council on Proposed Plan Change 29**

### **Rule - NOISE**

Zero Invasive Predators (ZIP) is submitting this in support of the Te Manahuna Aoraki Project (TMAP).

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Zero Invasive Predator wishes to speak on this submission.

If others make a similar submission, we do not want to present a joint case.

## About the Te Manahuna Aoraki Project

Te Manahuna Aoraki Project is a partnership between the Department of Conservation (DOC); mana whenua including Te Rūnaka o Arowhenua, Te Rūnaka o Moeraki, Te Rūnaka o Waihao; high country landowners, philanthropists, and other Crown agencies including Toitū Te Whenua | Land Information New Zealand (LINZ). Together, these organisations are protecting and revitalising a vast 310,000 hectare area in the Upper Mackenzie Basin and Aoraki | Mount Cook National Park, so that native plants and animals can thrive.

Zero Invasive Predators (ZIP), on behalf of Te Manahuna Aoraki Project (TMAP), is developing an approach to protect native species by eliminating possums, rats, rabbits, hares, ferrets, stoats, hedgehogs and feral cats which are widespread throughout the Mackenzie District. Their ongoing presence has put the native plants and animals that inhabit this area under threat of local extinction, and diminishes the mauri (life force) of these iconic alpine and farmland environments. Predators such as possums, rats, ferrets, stoats and feral cats prey upon native birds like kea, kakī and tūke (rock wren), along with lizards and invertebrates such as scree wētā. Browsing by possums has a significant impact on alpine shrublands and herb fields.

Rabbits and hares thrive in dryland environments and damage the sensitive habitats of this area. They are also a food source for introduced predator populations, keeping predator numbers high and putting our native species at risk. The Mackenzie Basin has been considered the most rabbit prone district in the Canterbury region and rabbit populations had been steadily increasing since 2004.<sup>1</sup>

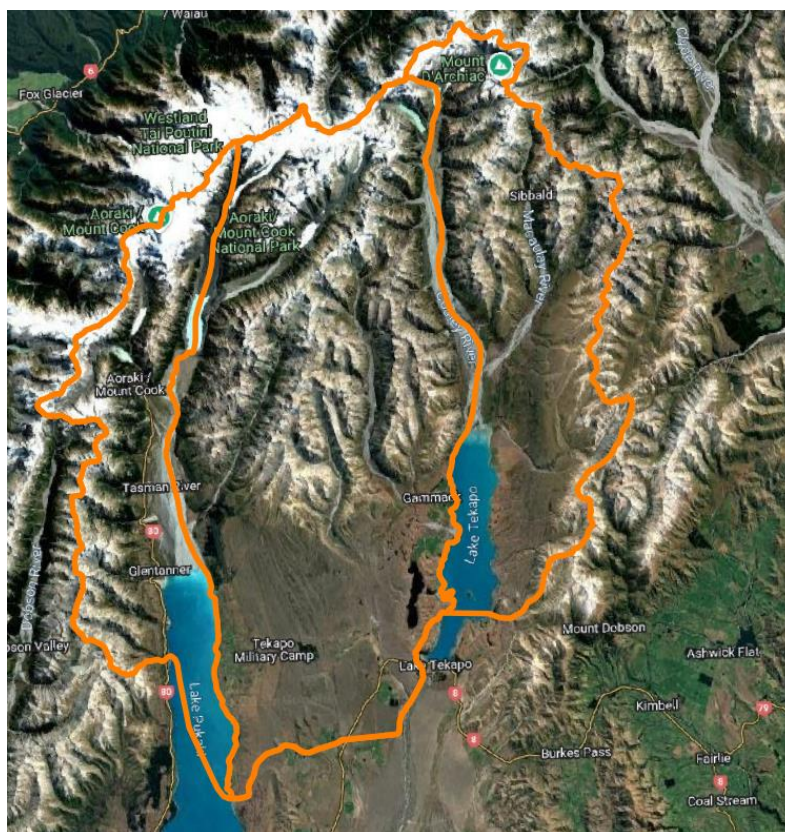


Figure 1 showing extent of the Te Manahuna Aoraki Project

<sup>1</sup> <https://www.mpi.govt.nz/dmsdocument/16870-The-current-state-of-rabbit-management-in-New-Zealand-Issues-options-and-recommendations-for-the-future>

Prior to completing a pest control baiting operation, permission is required from Te Whatu Ora | Health New Zealand before undertaking any work with specific poisons. Consent is also required from all property owners of the land where the pest elimination work is being completed. Neighbours, along with other affected parties are also consulted with as a requirement of the Te Whatu Ora | Health New Zealand permission process.

### **Impact of the restrictions on aircraft movements on Predator Elimination Field Work**

The proposed rules regarding the very restricted number of aircraft movements per site per day will have a significant impact on ZIP's ability to undertake pest elimination work in the Mackenzie District. The proposed rule limiting of the number of aircraft actions per day per site will mean that pest control work will become a controlled activity. It goes against the exemptions previously granted to enable this kind of work in the Resource Management (Exemption) Regulations 2017.<sup>2</sup>

Zero Invasive Predators (ZIP) uses multiple aerial and ground-based methods to target all individual pests which include:

- Application of Vertebrate Toxic Agents (bait) by helicopter. As an example, a larger rabbit elimination operation may involve 40-60 aircraft movements per day from a single load site.
- Use of helicopters to access remote backcountry areas to service cameras, traps and other elimination devices. This work may involve 40-60 aircraft movements per day across a number of device locations/access points, several times a year.

Helicopters are the most economical method of dispersing vertebrate toxic agents (VTAs) across large areas of land. They also provide fast access to remote areas where the terrain makes it extremely difficult and time consuming to access via other methods.

Please note that helicopter load sites need to be in proximity to the operational area, as such will change with each new operational area.

### **Other Impact of the restrictions on aircraft movements on Predator Elimination Work**

The Assessment section of *PC29 and Variations s32 Report and Appendices* includes a statement that the implementation of the proposed noise rule will have *no unjustifiably high costs on the community or any part of the community and that the proposal has an acceptable level of uncertainty or risk*. This statement is incorrect and the proposed rule would have a considerable financial impact on the Te Manahuna Aoraki Project and Zero Invasive Predators.

The proposal to restrict aircraft actions to four per site per day would only allow for aircraft movements for the setup and dismantling of the operation on the day of an aerial operation.

If the proposed rule regarding the restricted number of aircraft landings is confirmed an operation would need to take place over several weeks to attain the same level of bait distribution that we can currently achieve in a single day. This would have a greater level of negative impact on any noise sensitive areas than the completion of work in a shorter time span.

Requiring a resource consent, in addition to Te Whatu Ora | Health New Zealand and DOC, is a significant extra workload and cost. Some operations can be time sensitive as pests can breed quickly. A delay due to having to apply for and process a resource consent would be significant to a pest control operation and the number of pests that need to be eliminated. There will be a time cost for both the

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<sup>2</sup> <https://legislation.govt.nz/regulation/public/2017/0021/latest/DLM7104033.html#DLM7104015>

Mackenzie District Council and Zero Invasive Predators to establish and maintain an on-going active resource consent.

The proposed restriction on aircraft actions per site per day would likely increase safety risks when undertaking aerial pest control operations due to:

- a) Pressure being put on the team to complete their work with less aircraft movements, ie more “hover exits” rather than landings.
- b) Responses to technical and mechanical issues e.g., bucket issues or challenges with the GPS tracking system not being addressed immediately as it would use ‘aircraft actions’ which could mean the end of work for the day at a considerable expense to project.

### **Aircraft Noise in the Mackenzie Basin**

The airspace above the Mackenzie Basin is very active so aircraft noise is common. This is mostly by tourism operators along with other activities such as sky diving, heli-skiing, hunting parties, climbers and such. The airspace in and around the National Park is particularly active with flights leaving from Tekapo/Takapo, Glentanner, Mount Cook and Pukaki airports. Anecdotally, the Liebig Glacier is one of the most landed on place in New Zealand.

The draft Aoraki Mount Cook National Park Management Plan<sup>3</sup> (Sept 2018) allows for up to 200 landings per day per site (400 aircraft actions) in some areas, while some areas are allowed unlimited aircraft landings. This is a significant contrast to the proposed NOISE rule which proposes a very limited number of aircraft movements in areas adjacent to the national park.

### **Request for change to the proposed Plan Change 29 NOISE rules**

We are seeking that MDC deem aerial work in support of pest management work to be a permitted activity within the district plan. This would align with the RMA exemption regulations<sup>4</sup> which exempts the discharge of vertebrate toxic agents from compliance with the Resource Management Act.

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<sup>3</sup> <https://www.doc.govt.nz/contentassets/7604d89909144a0b9e0bc556dc8d84f9/aoraki-mt-cook-draft-npmp.pdf>

<sup>4</sup> <https://legislation.govt.nz/regulation/public/2017/0021/latest/DLM7104033.html#DLM7104015>