



21 April 2017

Mr Malcolm Nicholson
Chief Executive Officer
Northland Regional Council
Private Bag 9021
Whangarei 0148

Dear Mr Nicholson,

Submission from Kiwifruit Vine Health and New Zealand Kiwifruit Growers Inc. to Northland Regional Council (NRC); concerning the proposed Northland Regional Pest and Marine Pathway Management Plan.

Thank you for your letter of 17 March 2017, inviting feedback to how pests are managed in the Northland Region. **Kiwifruit Vine Health** (KVH) is the agency established by kiwifruit growers to lead New Zealand's kiwifruit industry in managing all biosecurity threats to the kiwifruit industry. Kiwifruit includes all *Actinidia* species. **New Zealand Kiwifruit Growers Inc.** works to advocate, protect and enhance the commercial and political interests of NZ kiwifruit growers.

Approximately 5% of New Zealand's kiwifruit crop is grown in Northland, generating approximately \$80 million revenue to the Northland region. The kiwifruit industry is also a major regional employer.

KVH has worked with NRC since 2011, to identify and cost-share the removal of 10 abandoned kiwifruit orchards in the Northland region. This cooperation and prompt action between the kiwifruit industry and NRC prevented any possible *Pseudomonas syringae pv actinidiae* (Psa) infection establishing within these unmanaged kiwifruit vines and potentially infecting commercial orchards.

There remains a risk, however, that wild (or naturalised) kiwifruit plants will establish and present a biosecurity threat to commercial orchards through harbouring disease organisms; or wild kiwifruit plants further spreading through birds feeding on wild fruit and distributing seed. Wild kiwifruit is now well-established in the coastal Bay of Plenty with contractors controlling an average of 11,000 wild vines yearly. Wild kiwifruit is a declared pest plant within the Auckland, Waikato and Bay of Plenty Regional Pest Management Plans.

Although wild kiwifruit plants have not yet naturalised in large numbers in Northland, there is risk that they will do so. NRC needs the legislative ability to enforce the control of wild kiwifruit. KVH has limited ability to enforce control of wild kiwifruit, and no ability to recover costs from offending landowners – this because the National Psa-V Pest Management Plan, managed by KVH, is primarily concerned with managing the bacterial disease Psa-V. Protecting biodiversity and the regional economy are regional government responsibilities.

KVH has emailed NRC biosecurity manager, Don McKenzie, (20/07/16) asking that wild kiwifruit be declared a pest plant in any future Northland Regional Pest Management Plan; and that NRC consider a cost-share approach, with KVH, to controlling any wild kiwifruit identified within the Northland region.



Wild kiwifruit has not been named as a pest plant within the proposed Northland Regional Pest and Pathway Management Plan, but is named (as wilding kiwifruit) in section 6.4.1 (page 63) of plants banned from sale and distribution. Please be aware that five KVH-registered nurseries are established in Northland selling plants from the specified *Actinidiaceae spp.* family. Through the National Psa-V Pest Management Plan, KVH has very strict management and a certification scheme in place for any nursery (or any person or identity) selling kiwifruit plants. Current KVH rules also prevent the movement of any kiwifruit plant material including wild kiwifruit plants or any part of a plant. As specifically requested below, KVH suggests that NRC remove wilding kiwifruit from the list of plants prohibited from sale and distribution, but do include **wild kiwifruit** (with the definition below) as a pest organism. NRC could acknowledge that KVH manages the sale, propagation and distribution of all *Actinidia spp.* plant material.

KVH and NZKGI make the following requests of NRC in respect of the proposed Northland Regional Pest and Pathway Management Plan:

1. Wild kiwifruit be named as a pest organism in Section 4 “Organisms declared as pests” page 13.
2. A definition of wild kiwifruit be included within the Plan: the definition used by KVH is “Any unmanaged plant material, self-propagated or abandoned plant of the *Actinidia* genus on private or public land”.
3. “Wilding kiwifruit” be removed from the plants listed in Section 6.4.1 – plants banned from sale and distribution.
4. Wild kiwifruit be named as an Eradication Programme pest in the Plan. **Reason:** There have been low numbers of wild kiwifruit found in Northland to-date: wild kiwifruit is likely to be in the “Lag phase / Eradication” area of the Invasion curve graph, figure 5.1, page 20. In the Northland Regional Pest and Pathway Management Plan Cost Benefit Analysis Report, Proposed management, page 449, includes the following text:

Option	Explanation of benefits	Explanation of costs	Level of risk that programme will not be successful
Eradication programme	Wilding kiwifruit is uncommon in Northland but they have the potential to establish at more sites. Eradication would enable any infestations that are found to be destroyed, preventing long-term economic and environmental impacts and removing a potential "sink" for Psa.	Eradication of wilding kiwifruit would require an investment of resources to undertake surveys and control any plants that are found.	Low-Moderate. Wilding kiwifruit are only occasionally present in Northland and control methods are available. Kiwifruit Vine Health works collaboratively with Regional Councils and landowners to manage wild kiwifruit populations and abandoned orchards to reduce biosecurity risk to the kiwifruit industry. There is only a low to moderate chance of eradication failing.

5. NRC and KVH negotiate the funding amount required by NRC to undertake control work of wild kiwifruit as an Eradication pest. In the Bay of Plenty control work costs are met by KVH (37.5%), BOPRC (37.5%) and landowners (25%).

6. NRC undertake and fund surveillance for wild kiwifruit as part of NRC biosecurity and other land management activity.
7. KVH can work with NRC to undertake an awareness initiative regarding wild kiwifruit – for example asking the public to report sites of any wild kiwifruit.
8. KVH can work with NRC on any future kiwifruit industry machinery hygiene or biosecurity pathway management initiatives which include the kiwifruit industry.

Thank you for considering these requests from KVH and NZKGI. KVH can meet with you and NRC biosecurity staff to discuss any aspect of this submission.

Yours sincerely,



Barry O'Neil
Chief Executive
Kiwifruit Vine Health



Nikki Johnson
Chief Executive
New Zealand Kiwifruit Growers