



Environment and Primary Production committees
Parliament Buildings
Wellington

17 August 2022

Dear committee members

Thank you for inviting me to respond to the oral and written submissions made by the Ministry for Primary Industries (MPI), Department of Conservation (DOC) and regional councils concerning my report, *Space invaders: A review of how New Zealand manages weeds that threaten native ecosystems*.

At their core, my recommendations are a call for greater leadership. However, nothing in my interaction with ministers and officials or in their submissions gives me confidence that that call will be answered any time soon.

MPI's and DOC's responses are a litany of caveats and caution for not progressing faster. While they apparently agree with the recommendations, this agreement is couched in a way that avoids any clear commitment to implement them.

That is the opposite of leadership. In this case, leadership would entail acknowledging the shortcomings that currently bedevil weed management, spelling out what can be achieved to improve the situation with a timeframe and a game plan to get there, and identifying who is accountable for what. While MPI did not acknowledge any shortcomings in its submission, DOC, for the most part, accepted the criticisms about its weed management.

I am conscious that agencies are resource constrained and that there is not a lot of capacity for large reform, especially given how much other reform is going on in the environmental space and other echelons of government at the moment. I deliberately made recommendations that could be progressed without heavy claims on financial or human resources.

But they *do* require appropriately qualified staff to do some thinking, make connections with the wealth of expertise that exists in New Zealand, and set about spelling out priorities and identify the resources that will be needed to effect a minimum of progress.

While I would like to see all my recommendations actioned, MPI and DOC could focus on four discrete things to start with. It would show that they are taking leadership seriously. Those four things are:

- Setting about improving the information system for weeds. This is foundational both for prioritising existing weeds and identifying emerging risks.

- Creating an expert team to scan for emerging risks – we need to nip problems in the bud (literally and figuratively).
- Revising national policy direction.
- Developing a more genuine and deliberate partnership with regional councils.

Weed information system

In their submission, regional councils recommended that “if one action is taken from this report it would be to address Recommendation 6 [a database of all exotic plants in New Zealand].” Councils further recommended that “the conversation is not about any specific database per se, but the type of information collected and how it can either be fed into or drawn from existing platforms.” In other words, they are calling for a fully integrated weed information system. From what I have heard, researchers are keen to provide their expertise and be involved with this initiative.

Ironically, this seems to be the recommendation about which officials in Wellington have expressed the greatest doubts. MPI’s response states that “Developing a single authoritative weed database for NZ is likely to be challenging, given the large and increasing number of weeds in New Zealand and the costs associated with maintaining such a database in the long term.” MPI officials also stated that they “need to understand the clear need or purpose of such a database alongside [other] publicly-available databases”. DOC’s submission states that “DOC is yet to form a view on this recommendation.”

It is extraordinary that the agency responsible for managing New Zealand’s biosecurity cannot see the value of a tool that front-line staff around the country have said is the most important recommendation in this report. It appears that MPI really does not appreciate the practical problems that weed managers face. It is also remarkable that DOC, the department with the leadership role for protecting native biodiversity, is yet to form a view.

The currently fragmented nature of information resources, with gaps in weed data and taxonomic issues undermining information flow, is unacceptable. Making progress on recommendation six does not necessarily mean a brand-new construction from the bottom up. Progress would be more in the nature of developing an information system where the existing elements we have are joined up, and all available information is automatically supplied to a user on request.

The committees should ask MPI and DOC to report back within six months with a detailed explanation of *what it would take to set in train a process that will improve the weed information system* and lead to the construction of a database of all exotic plants in New Zealand. That system needs to avoid muddles over names (taxonomy), be kept up to date, and over time enable a wide range of parties to contribute information in real time on status, distribution and spread.

This is a foundational tool to underpin effective management and leadership in one of the weediest countries in the world. Progress needs to be made.

Emerging risks team

We cannot afford to have a succession of naturalised exotic plants stand in line to become the next wilding conifers. A more modest upfront investment in that case would have saved taxpayers hundreds of millions of dollars and counting.

A small team made up of experts from MPI, DOC, the research community and regional councils, meeting quarterly and drawing on international, regional council, DOC and MPI monitoring and surveillance data would be a simple, low-cost place to start. But once again, a much-improved national weed information system is an essential tool to support such collaborative activity.

Revised national policy direction

National direction helps provide consistency nationally and between regions. Key starting points for national policy direction on weed management would be (i) setting out a prioritisation process, and (ii) providing direction on how to balance emerging risks with tackling already widespread weeds.

I agree with the regional councils' comment on the importance of national policy direction but not overregging it at the expense of practical initiatives.

I deliberately provided an option for this that did not require legislative change. MPI's statement that it is "considering best options to provide better national direction" is a non-committal start. I worry that this could imply a long, drawn out and complex policy process. It need not be. MPI and DOC have talented policy advisors on staff that could provide this direction if given the mandate and priority by their leaders. It is a simple way for both MPI and DOC to live 'leadership'.

Partnership with regional councils

I commend the submissions made by regional councils. The councils clearly identified what would make a practical difference on the ground and the support central government could usefully provide.

Regional councils are calling for a stronger partnership with central government. Partnership means more than MPI and DOC attending a few joint meetings a year. It is about actively collaborating with regional councils on all of the recommendations, especially on the three key actions I have identified above.

I would like to acknowledge the interagency biodiversity/biosecurity leadership group recently formed at the initiative of the director-generals of DOC and MPI. I understand regional councils are also part of that group. While its focus is wider than weeds, it could be a good vehicle through which to progress my recommendations.

Next steps

I will continue to follow up my report with ministers, MPI, DOC and regional councils. To help energise some action, I plan to co-host a workshop this year between biosecurity experts in the regions, the research community, MPI and DOC staff to discuss how best to take key recommendations forward and collectively focus our efforts.

I would like the committees to keep the *Space invaders* report on their radar. I wrote it because it appears to me that weeds threatening our native ecosystems are a poor cousin to pest predators and are in danger of falling off the agendas of the agencies theoretically responsible for managing them. I suggest that you place DOC and MPI on notice that you will follow up with them and their ministers when they appear for annual reviews and estimates hearings.

You may like to consider scheduling a further follow up in six to nine months' time specifically to review progress on the priority issues I have identified above, the report's other recommendations and how the partnership with regional councils is developing and evolving.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Simon Upton', with a stylized flourish at the end.

Simon Upton

Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata