



Environmental  
Protection Authority  
*Te Mana Rauhi Taiao*

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## Ngā Kaihautū Tikanga Taiao Report

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# Moth Plant Application No. APP201039

21 November 2011



Application for New Organism unconditional release under section 34 of the Hazardous Substances and New Organisms (HSNO) Act 1996.

## Tēnā koutou katoa

### Introduction

My name is Nick Rahiri Roskruge and I am a member of Ngā Kaihautū Tikanga Taiao (Ngā Kaihautū). I am a descendant of the Atiawa ki Taranaki, Ngāti Tama-Ariki and Ngāti Ruanui tribes and I am a horticultural agronomist employed by Massey University.

1. This report represents the views of Ngā Kaihautū regarding the application by Waikato Regional Council to import and release from containment the beetle *Colaspis argentinensis* (Coleoptera: Chrysomelidae: Eumolpinae) as a biological control agent for the weed moth plant (*Araujia hortorum*) (APP201039). The author has examined the application along with pre-application consultation with Māori.
2. Ngā Kaihautū is charged with the responsibility of providing advice and assistance, from a Māori perspective, to the Environmental Protection Authority (EPA). As part of that role, Ngā Kaihautū has considered this application under section 6(a) of the HSNO Act 1996.
3. As part of the assessment for this application consultation with Māori was commissioned by Waikato Regional Council to assess the impacts for the release of this biological control agent on moth plant and on the relationship of the agent on Māori and their culture and traditions with the environment. This consultation was completed by Richard Hill of Landcare Research. The outcome of the consultation is, in their words: consultation resulted in seven responses. None specifically opposed the proposal. Four either did not oppose, or acknowledged that biological control was necessary. No significant positive effects were identified other than those accruing to the general population. Consultation on previous applications revealed that Māori are not generally happy with the introduction of non-native species to Aotearoa/New Zealand, but successful biological control is viewed by many as preferable to the application of herbicides that may degrade air, soil and water.
4. Ngā Kaihautū acknowledges this consultative process and other supporting documents aligned to the application. We also acknowledge that consultation with Māori appears to have been carried out in accordance with our policies. As a result of this process however, several concerns have been raised.
5. It is our view that the consultation statement, especially in regard to the generalisation taken from previous applications does not adequately identify some of the concerns given by Māori. In reaching this view, Ngā Kaihautū has taken into account concerns raised by iwi/Māori in submissions to applications for the introduction of biological control agents. In particular, section 6(d) refers to 'the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, valued flora and fauna, and other taonga'.

Some key points to note around the application are as follows:

6. Much of the iwi response to the pre-application phase of this application indicated concern about 'another' biological agent entering the ecosystem and the resulting potential for iwi/Māori to be reacting to the introduction because of the limited knowledge of the impacts prior to release. They also indicated unease about limited post-release monitoring of the biological agent as a control rather than being fully informed about consequences prior to release. Ngā Kaihautū concurs with the position.
7. The applicant states that it is expected that three control agents will be introduced for the control of moth plant over the next five years and once established, it is likely that populations of the control agents will grow for some years before approaching maximum density. Whilst we acknowledge that each application is made and determined in isolation, within Te Ao Maori the ecosystem is viewed as a whole and the prospect of multiple agents being introduced to control a single weed presents a scenario which should be considered with the appropriate caution.
8. Concerns given by Māori on biological introductions at various hui and cultural gatherings continue to stress that we need to be cognitive of how little we actually know about our ecosystem. Much of the biodiversity that exists within Aotearoa, especially at the microbe and fungal level, remains relatively unknown as biosystematics experts will testify. This means we should also recognise the element of risk that exists relative to what we do not know at the time of application.
9. The generalisation that the introduction of non-native species as biological control agents is preferred ahead of chemical controls by Māori belies the caution constantly expressed around the effect of these species on the ecosystem. Information around the alternative options relative to chemical, physical, cultural and organic controls needs to balance this generality.
10. As a final point to note, there is a likely positive effect on our 'organic' or indigenous land management systems through managed biological control options and this agent may have this effect for many Māori landowners. It is entirely likely that there is a considerable amount of the Māori land estate affected by the weed infestation as well as part of the public and Department of Conservation estate and as such considerable benefit could be incurred if the process was to satisfy the concerns identified.

## Recommendation

Ngā Kaihautū recommends that the EPA considers this application taking into account the issues outlined above and mitigation measures as appropriate.