

9. COUNCIL RESPONSE TO THE PRELIMINARY FINDINGS AND RECOMMENDATIONS OF THE WILDLIFE PROTECTION REVIEW WITH REGARD TO CANADA GOOSE

General Manager responsible:	General Manager City Environment, DDI 941-8608
Officer responsible:	Transport & Greenspace Manager
Authors:	Derek Roozen, Kay Holder and Andrew Crossland

PURPOSE OF REPORT

1. The purpose of this report is to seek Council approval of a response (**attached**) to the Department of Conservation on the Department's report "Review of Level of Protection for Some New Zealand Wildlife – Preliminary Findings and Recommendations on Canada goose" ("the report").

EXECUTIVE SUMMARY

2. The Department of Conservation ("the Department") is reviewing the status of Canada goose under the Wildlife Act 1953 ("the Act"). The Department has prepared recommendations for approval by the Minister of Conservation. They are seeking the views of the Council and other key stakeholders prior to the Minister making his decision.
3. Canada goose is currently listed in Schedule 1 of the Act. This means the species is managed as a game species by Fish and Game New Zealand and is protected, except to holders of game licences. Fish and Game undertake their management role pursuant to the South Island Canada Goose Management Plan. This plan requires Fish and Game to manage the Canada goose population primarily in the interests of recreational hunters.
4. The population of Canada goose has been increasing for many years and exceeds the maximum thresholds set by the plan. The adverse effects have grown with the population. The effects include damage and soiling of urban parks, crop damage in rural areas, reduced water quality and significantly increased risk of aircraft bird strike.
5. Past attempts to control numbers have been controversial and have not resulted in lasting reductions. Objections have been raised by both hunters and those wishing to prevent harm to Canada geese. The increasing adverse effects, however, have led to calls for greater control; hence the current review.
6. Council decisions are sought on three components of future management of Canada goose. The first is to determine in which schedule of the Act they should be listed (and hence who is able to undertake management and for what purpose); second, whether or not the Council wishes to be the lead agency for Canada goose management within the Christchurch urban area, and; third, whether or not legislative reform is required to provide better future Canada goose management and accountability.
7. The relevant schedules of the Act are:
 - Schedule 1: Status quo, with management as a game species by Fish and Game.
 - Schedule 3: Allows for management by another agency, subject to approval by the Minister of Conservation. This would allow for management based on a wider set of objectives than management as a recreational game species.
 - Schedule 5: Canada goose would no longer be protected and could be controlled by any individual or agency.
8. Schedule 1 (the status quo) is resulting in increasing population and adverse effects. The Council has previously recommended Schedule 5, which would allow the Council or others to undertake Canada goose management to reduce adverse effects. Subsequent information has, however, suggested that this option may not be effective as the geese are intelligent and mobile, and uncontrolled hunting is likely to result in shifting the population and the birds learning how to avoid control measures. Schedule 3 is now recommended as it retains sufficient powers for effective management, but allows for a wider set of objectives to be met in addressing adverse effects.

9. It is also recommended that the area subject to Schedule 3 be greater in coverage than just the Christchurch urban area to allow more effective control, particularly for managing air safety (birdstrike risk). This is due to there being significant goose habitat relatively close to Christchurch, but outside the City boundary.
10. Options for Council participation (and funding) of Canada goose management methods are:
 - Option 1: Council indicates its interest in working with other parties to ensure effective Canada goose management, but not taking the responsibility of the lead agency.

or

 - Option 2: Council indicates that it is prepared (subject to any required consultation) to accept responsibility as the management agency for Canada goose within the Christchurch urban area.

or

 - Option 3: Council indicates that it does not wish to have involvement in the management of Canada goose.
11. The first option is recommended. To implement this option it is proposed that discussion be held with Environment Canterbury (which already has extensive pest species management operations for a variety of bird, animal, insect and plant species), Christchurch International Airport Limited (CIAL) and other potentially interested parties.
12. The review report by the Department of Conservation highlights the limitations of the Wildlife Act, with respect to Fish and Game needing to take account of wider community objectives and being held to account where management plan objectives are not met. It is recommended that the Minister consider legislation changes to address these issues.
13. A legal opinion concludes that there is only a low risk of liability to the Council, if it took on the management of Canada goose in the Christchurch urban area, provided it carries out appropriate practices.
14. There is currently no financial provision for Council to take on the role of lead agency for Canada goose management. If this was the preferred direction, a detailed costing would be required and it is likely to require further public consultation.
15. CIAL has shown support for moving Canada goose from Schedule 1 to Schedule 3, and for Environment Canterbury to take the lead role in Canada goose management.
16. Staff reported to the Council's Submissions Panel at its meeting on 27 February 2009. The Submissions Panel resolved to recommend the Council respond to the Department of Conservation to (a) express support for Canada goose to be listed on Schedule 3 of the Wildlife Act 1953, (b) suggest Environment Canterbury be the lead management agency for a proposed area that includes the Christchurch urban area, Banks Peninsula, and part or all of the Selwyn and Waimakariri Districts, and (c) suggest legislative changes to support more effective Canada goose management within areas covered by Schedule 1.
17. A proposed response to the Department of Conservation is **attached**.

PUBLIC CONSULTATION

18. In its review report, the Department of Conservation advises that Canada goose attracted the greatest number of public submissions. Fish and game councils, hunting organisations and supporting individual submitters want the game status of the species to remain unchanged. They see Canada goose as a national recreational asset and consider that game management has controlled Canada geese effectively in most parts of the country. Farming, aviation, horticultural and regional council submitters generally see Canada geese as having unacceptable impacts on landowners, and most of these submitters favour a change of status of the species to enable more landowner control.
19. No consultation has been done directly with the Christchurch public by the Council on this issue.

SUBMISSIONS PANEL RECOMMENDATION

The Submissions Panel recommends that the Council responds to the Department of Conservation that the Council:

- (a) Supports Canada goose being listed on Schedule 3 of the Wildlife Act 1953.
- (b) Agrees to consider to be a member of a Canada Goose Management Group administering the management of Canada geese, but to not be the lead management agency.
- (c) Suggests that Environment Canterbury be the lead management agency for an area covered by a Canada Goose Management Group as it is best positioned to manage effectively an area across several territorial jurisdictions, and that the Council be able to recover any extra costs, over and above the Council's current level of expenditure, resulting from Canada goose management from the lead management agency.
- (d) Proposes for the area to be covered by a Canada Goose Management Group to include the Christchurch urban area, Banks Peninsula, and part or all of the Selwyn and Waimakariri Districts.
- (e) Supports legislative change to enable the Minister of Conservation to be fully informed on whether or not ongoing management of Schedule 1 species is meeting the needs of non-hunting sectors of the community, and have the power to ensure that the management of Schedule 1 species does meet these needs.

BACKGROUND

20. At its meeting on 8 February 2007, the Council approved a submission to the Department of Conservation on the Department's review of the level of protection afforded to some species of New Zealand wildlife under the Wildlife Act 1953 ("the Act"). The Council's submission referred to a number of specific wildlife species in relation to the Act. One of these was Canada goose. The Council's view was that the status quo management of Canada goose is not working and it indicated in its submission its preference for Canada goose to be moved from Schedule 1 of the Act (game species) to Schedule 5 (unprotected species).
21. Canada goose was introduced to New Zealand from North America in 1905 to provide a hunting resource, and this species is now well established in the South Island, particularly in eastern areas from Marlborough to Otago. Key sites for Canada geese to congregate at during the moulting season (from December to January) are, in the case of the Christchurch urban area, the Avon-Heathcote Estuary (in particular, the Bromley oxidation ponds area). Key sites for juvenile and older Canada geese for the whole of the eastern South Island are Lake Ellesmere/Te Waihora and Lake Forsyth/Te Wairewa (breeding Canada geese tend to moult in more remote parts of the South Island with the young they are raising). Outside the moulting period, Canada geese return to their preferred living and feeding areas for the rest of the year. The Avon-Heathcote Estuary area is also popular for Canada geese outside the moulting period.
22. On 8 January 2009, the Department of Conservation forwarded to Council staff its report on the preliminary findings and recommendations of the wildlife protection review in regards to Canada goose. This includes the recommendation of moving Canada goose from Schedule 1 to Schedule 3 (species that can be hunted or killed, subject to conditions specified by the Minister of Conservation) of the Wildlife Act for parts of the North Canterbury Fish and Game Region to allow Canada geese to be managed in ways that balance the objectives of all community sectors, including the management of urban parks, ensuring aviation safety and allowing recreational hunting of Canada geese to continue to be feasible.
23. The Department advises that, before Canada goose can be managed under Schedule 3, there needs to be an organisation or group of interests, with the capability and funding to undertake goose control, willing to manage geese to a balance of objectives, including the ones referred to in paragraph 22 above, in the area where a Schedule 3 listing is proposed. The Department says that if no organisation or group of interests is willing and able to do this, then the option of listing Canada geese on Schedule 3 will not be viable. It asks if the Christchurch City Council is willing to become the management agency for Canada geese in the Christchurch metropolitan area (broadly defined by the Department as those parts of Christchurch City within the area bounded by Waimairi Beach, Belfast, Christchurch International Airport, Islington, Halswell, Lyttelton and Taylors Mistake, and inclusive of those areas), perhaps in conjunction with Christchurch International Airport Limited (CIAL).
24. The Department notes that the review it has undertaken has found that Canada goose control is required in North Canterbury (and the Christchurch metropolitan area, in particular) to reduce risks to aviation safety and impacts on urban parks and sports grounds, and that the required management options would reduce Canada goose hunting opportunities. It points out the reasons why the following organisations are not in a position to take up the required management role. These are, firstly, that Fish and Game Councils have a statutory obligation to maximise hunting opportunities; secondly, that the Minister and Department of Conservation currently have no power to direct that aviation safety or urban park management take priority in Canada goose management.
25. Further to noting the limitations of the Department of Conservation in setting, and Fish and Game in meeting, objectives that can be met in Canada goose management in those areas where Canada goose is listed in Schedule 1, the review report notes that there are legislative impediments to the Minister of Conservation, firstly, being fully informed on whether or not ongoing management of Schedule 1 species is meeting the needs of non-hunting sectors of the community and, secondly, being able to ensure that the management does meet these needs.

26. The review report considers the option of moving Canada goose to Schedule 5 and determines that this would not provide for the overarching management oversight necessary for efficient Canada goose control. Furthermore, the option of regional councils including Canada goose as a pest in regional pest management strategies is discounted in the report on the grounds that this would first require a statutory public notification process, which would result in unwanted delay to the time Canada goose would become part of an operational pest management strategy.
27. In addition, the Department of Conservation makes the preliminary recommendation to the Minister of Conservation that Canada goose be moved from Schedule 1 to Schedule 3 for Lake Ellesmere/Te Waihora and Lake Forsyth/Te Wairewa, and the land areas within two kilometres of the shores of these lakes, and remain listed in Schedule 1 for the remainder of the North Canterbury Fish and Game Region (except metropolitan Christchurch). The rationale for this is to allow landowners affected by Canada geese to undertake cost-effective operations to reduce the regional Canada goose population when required (it will require, though, for these landowners to have the capability and funding to undertake Canada goose control, and be willing to manage Canada geese to a balance of objectives, as referred to in paragraph 22 of this report). For the parts of the region where Canada goose remains listed on Schedule 1, the North Canterbury Fish and Game Council will continue to have statutory responsibility for managing Canada geese.
28. With Canada goose listed in Schedule 1, Fish and Game New Zealand manages this species as game pursuant to Section 4 of the Wildlife Act 1953. Under Section 15 of the Act, Fish and Game can declare an open hunting season for game, including Canada goose, according to national and regional regulations, which are reviewed, approved by the Minister of Conservation and a notice published in the New Zealand Gazette annually. In the event Canada goose is listed in Schedule 3, for those areas covered by this listing, Section 6 of the Act applies. This Section specifies that Canada goose is wildlife that may be hunted or killed, subject to the Minister's notification. Under this section, the Minister may, by notification, declare that Canada goose may be hunted, killed or possessed, subject to conditions (subsection (1)), and prescribe other conditions, including who may do so, the numbers of Canada geese involved, where in New Zealand, when, and by which methods (subsection (2)).

NORTH CANTERBURY CONTEXT

29. The 2006 Canada goose population count for the North Canterbury Fish and Game Region was 17,509. This exceeds the South Island Canada Goose Management Plan threshold levels for the region of a maximum of 10,500 (1995 plan) and a range of 12,250 to 17,200 (2000 draft plan) (source: Page 35, Review of Level of Protection for Some New Zealand Wildlife – Technical Analysis on Canada goose. Department of Conservation. 31 July 2008). For the same year, Christchurch City Council Park Ranger staff counted in the city environs an average of around 2,800 Canada geese (from ten countings throughout the year) (source: Christchurch Large Waterfowl Counts. Unpublished Christchurch City Council report. Updated January 2009).
30. Table 1 shows game bird complaints made to the North Canterbury Fish and Game Council from 2001 to 2007. The total number of complaints is about average compared with fish and game regions around the country, but more than half (53 per cent) of these are complaints about Canada geese. There are more than three times as many complaints about Canada geese than for any other game species (source: Page 84, Review of Level of Protection for Some New Zealand Wildlife – Technical Analysis on Canada goose. Department of Conservation. 31 July 2008).

Table 1 North Canterbury Fish and Game Region Game Bird Complaints 2001–2007

	2001	2002	2003	2004	2005	2006	2007	Total
Canada goose	8	5	9	36	12	23	12	105
Paradise shelduck	4	0	1	0	0	4	7	16
Mallard duck	5	1	3	3	3	0	3	18
Black swan	1	8	9	0	2	3	7	30
Pukeko	9	4	5	8	0	2	1	29
Pheasant	0	0	1	0	0	0	0	1
Total	27	18	28	47	17	32	30	199

31. As Canada goose management is a matter Fish and Game New Zealand is responsible for, with all complaints to the Christchurch City Council of Canada geese causing problems on private land being referred to Fish and Game, no records are kept of RFSs (Requests For Service) received on Canada goose.
32. In the North Canterbury Fish and Game Region, submissions from Christchurch International Airport, Christchurch City Council, Environment Canterbury and Federated Farmers advise that the current impacts from Canada geese are unacceptable from their perspective and numbers need to be reduced (source: Page 17, Review of Level of Protection for Some New Zealand Wildlife – Preliminary Findings and Recommendations on Canada goose. Department of Conservation. 12 September 2008).
33. Since the North Canterbury Fish and Game Council is the statutory decision-maker for management decisions on game species, the Christchurch City Council and CIAL are unable to undertake goose management in ways that minimise urban impacts and risks to aviation safety. The North Canterbury Fish and Game Council is unwilling to accept the Canada goose management proposed by the Christchurch City Council, on the grounds that this would reduce recreational hunting opportunities (from the same source as paragraph 32).
34. The Canada geese that affect the Christchurch urban and International Airport areas spend time in places mainly outside these areas. Paragraph 21 of this report refers to the places Canada geese frequent.

ASSESSMENT OF OPTIONS

35. The Department of Conservation's preliminary finding and recommendation to move the listing of Canada goose from Schedule 1 to Schedule 3 of the Wildlife Act for the Christchurch metropolitan area (see paragraph 23 of this report for the Department's definition of this), and for Lake Ellesmere/Te Waihora and Lake Forsyth/Te Wairewa and the lakes' surrounds, and its suggestion that the Christchurch City Council take on the role for Canada goose control in the metropolitan area, is at variance to the position the Council presented in its submission in 2007. This submission supported Canada goose being listed as an unprotected species in Schedule 5, indicated that the Council is reluctant to support hunting as the first and primary method of Canada goose control, and implied support for Environment Canterbury to declare the Canada goose to be a 'pest species' in the Canterbury Regional Pest Management Strategy 2005-2015.
36. Christchurch City Council staff have considered the current situation for Canada goose in Christchurch and the surrounding areas and, following initial discussions with staff of other agencies with an interest in the management of Canada goose in the North Canterbury Fish and Game Region, including CIAL and Environment Canterbury, conclude that a multi-agency integrated approach to Canada goose management will be most effective for the parts of the region of mutual interest. This is because Canada geese travel across the region, so they may impact on particular places and come from other places in the region. Managing Canada geese well in one place will be ineffective if they are not equally well managed in another.

37. Staff suggest there is merit in having discussions between agencies in the North Canterbury Fish and Game Region in and around the Christchurch District who have an interest in Canada goose management in the area, with the view to forming a Canada Goose Management Group to administer Canada goose management in that area. This will mean that, for this area, Canada goose is listed in Schedule 3 of the Wildlife Act. The members of this group could include Environment Canterbury, Christchurch City Council, CIAL, Federated Farmers, Selwyn District Council and the Waimakariri District Council. Environment Canterbury would be requested to take the lead role in Canada goose management for the area covered by the proposed group, as its role already includes pest species management and it has in place an operative pest management strategy and operational plan. There is the option of Environment Canterbury listing Canada goose as a pest species in this strategy.
38. Table 2 summarises options for the Christchurch City Council to consider for its reply to the Department of Conservation's request for the Council to take over Canada goose management in the Christchurch metropolitan area, and implications for taking each option.

Table 2

Option	Implications
<p>1. The Council acknowledges the need for Canada goose to be listed on Schedule 3 of the Wildlife Act 1953 for the Christchurch metropolitan area, but considers management of Canada goose in this area should primarily lie with Environment Canterbury, as the agency with a key pest species management role. The Christchurch City Council could be involved as a member of a Canada Goose Management Group of agencies with an interest in Canada goose management. This proposed Group would address Canada goose management over an area that includes and surrounds the Christchurch metropolitan area, with Canada goose management led by Environment Canterbury.</p>	<ul style="list-style-type: none"> • This is about the Council acknowledging the appropriateness of a Schedule 3 listing of Canada goose for the Christchurch metropolitan area, but pointing out that, due to the fact Canada geese travel across, and use, a wider area, it is important to address the management of this species in an integrated and cooperative way over that wider area. Therefore, it is considered appropriate for a regional agency with an existing role in pest species management (Environment Canterbury) to take responsibility for Canada goose management in that wider area or, at least, lead a group of agencies dealing with this management. • A grouped, cooperative approach can mean a spread of the costs, risks and activities, with enhanced benefits (in terms of effectiveness, tactics and cost) from the economy of scale having multiple partners can provide. • This requires negotiation between, and agreement of, the relevant agencies to commit to a Canada Goose Management Group model for the longer term (including contributing to, and working cooperatively towards, achieving agreed balanced objectives for Canada goose management). • In addition, many of the implications listed for Option 2 below also apply to Option 1, but would be subject to agreement between the agencies involved.
<p>2. The Council accepts the offer to take responsibility for Canada goose management in the Christchurch metropolitan area, thereby enabling the Department of Conservation to move Canada goose to Schedule 3 of the Wildlife Act.</p>	<ul style="list-style-type: none"> • Taking over Canada goose management responsibility for the Christchurch metropolitan area is contrary to the position the Council took in its submission to the Wildlife Act review in 2007. Yet, Council staff, after consideration of the preliminary findings of the review, acknowledges the appropriateness of a Schedule 3 listing of Canada goose for the Christchurch metropolitan area. • Means Canada geese are being managed in one area only, though – a regional perspective and management approach would be more sensible, given the movement of this species. • The Council is able to focus on Canada goose population management, and not have to give emphasis to the provision of recreational hunting opportunities.

Option	Implications
	<ul style="list-style-type: none"> • The Council is able to meet the need for protection of the city's parks and waterways, and the needs of any partners, in directly managing the impacts of Canada geese in a manner that is appropriate, effective and sustainable. • It may be possible to concentrate Canada geese at certain sites, such as Travis Wetland, and reverse the recent trend of dispersal and colonisation of new sites, which has probably occurred due to shooting pressure at the estuary. With Canada geese concentrated at such sites, they are then not causing crop predation problems on private land or degrading turf/water environments elsewhere in the Christchurch metropolitan area. • Enables the utilisation of a wide range of effective control options. • Opens up possibilities for partnership models involving: <ul style="list-style-type: none"> ○ <i>Funders</i> (for example, CIAL, Federated Farmers). ○ <i>Land owners and occupiers</i> (for example, Christchurch City Council, lessees and private landowners). ○ <i>Control</i> (private contractors and exclusive-access private hunters). ○ <i>Monitoring</i> (Christchurch City Council rangers, CIAL and North Canterbury Fish and Game Council) • Better able to manage the negative impacts of control measures on other bird species (especially hunting disturbance), and reduces disturbance to the public. • Would need to risk manage for adverse publicity on Canada goose control undertaken. • The Council would need to meet the cost of Canada goose management in the Christchurch metropolitan area, and this is likely to be around \$15,000 annually. Currently, it does not budget directly for any Canada goose management. • The Council is taking over a role that should lie with Environment Canterbury instead, considering that this agency has a regional pest management strategy. Environment Canterbury has already targeted potential 'nuisance' birds (for example, Environment Canterbury staff shot a pair of Common Mynas at Lyttelton in 2004 before they could breed).
<p>3. The Council declines the opportunity to take any statutory responsibility for Canada goose control in the Christchurch metropolitan area, and accepts that Canada goose may then remain listed in Schedule 1 of the Wildlife Act.</p>	<ul style="list-style-type: none"> • Initially, at least, no direct costs of Canada goose control would be imposed on the Council. Indirect staff costs of monitoring would continue and the Council would need to budget for direct operational costs of future Canada goose control to address existing issues of Canada geese in the Christchurch metropolitan area (and need to seek permission from the North Canterbury Fish and Game Council to do so), if Canada goose remains listed on Schedule 1 of the Wildlife Act. • If Canada goose is shifted to Schedule 3, and an agency other than the Christchurch City Council takes over management responsibility for Canada geese in the Christchurch metropolitan area, that agency may seek to recover some of the costs of Canada goose control in the urban area from the Council.

Option	Implications
	<ul style="list-style-type: none"> In the event Canada goose remains listed on Schedule 1, the Council is reliant on the North Canterbury Fish and Game Council to manage the Canada goose population in the City and address the current issues with this species (increasing local populations and redistributions of Canada geese, resulting in the species becoming a nuisance by feeding on crops and pasture, fouling land and waterways, and occupying urban parkland and sports fields).

FINANCIAL CONSIDERATIONS

39. As the North Canterbury Fish and Game Council holds statutory responsibility for the management of Canada goose in its region, including in the Christchurch metropolitan area, the Christchurch City Council does not undertake, and therefore does not budget for, any Canada goose management. The Council has been monitoring Canada goose populations and movements within the city for more than 20 years (an average of 2,800 Canada geese in 2006 and 3,000 in 2008). Most of this has been done by Park Rangers, as part of their normal work programmes, and has not been separately budgeted for.
40. The potential financial implications for the Christchurch City Council are discussed for each of Options 1, 2 and 3 (see paragraph 38 and Table 2 in this report) in paragraphs 41, 42 and 43, respectively.
41. Option 1 (Canada goose is listed in Schedule 3, and managed by a group of agencies, with the lead management role undertaken by Environment Canterbury): Staff recommend that the Council supports Canada goose being listed on Schedule 3 of the Wildlife Act for an area greater than, and including, the Christchurch metropolitan area, and for those agencies with an interest in Canada goose management for that area being requested to form a Canada goose management group, with Environment Canterbury asked to take the lead role. Staff, following discussions proposed to be held between these agencies, can report back on the potential additional costs and obligations placed on the Council in the event the Council becomes a member of the proposed management group. The level of costs is subject to the discussions taking place and is not known at this time. This is not currently budgeted for in the Long-Term Council Community Plan. In this situation, the North Canterbury Fish and Game Council, unless it is a member of the proposed group, no longer has statutory responsibility for the management of Canada goose in the area and, therefore, is not subject to making a financial contribution.
42. Option 2 (Canada goose is listed in Schedule 3, and the Christchurch City Council has responsibility for the management of this species in the Christchurch metropolitan area): It is difficult to determine what the costs to the Christchurch City Council could be for Canada goose management in the Christchurch metropolitan area if Canada goose was listed on Schedule 3 of the Wildlife Act for this area, and the Council agreed to take on the role, but it could be around \$15,000 per annum. The work would include monitoring of Canada goose and, as necessary, control of the species in the Christchurch metropolitan area, with the Council employing appropriate methods. The Council would need to budget for taking control of this matter, which would include ongoing costs, including having staff (one or more Park Rangers) involved in this work. This is not currently budgeted for in the Long-Term Council Community Plan.
43. Option 3 (Canada goose remains listed in Schedule 1, and the North Canterbury Fish and Game Council retains statutory management responsibility for Canada goose): The North Canterbury Fish and Game Council needs to resource Canada goose management in its region (see paragraph 44 for expenditure nationwide). The Christchurch City Council's position on Canada goose management, as described in paragraph 39, stands. There is currently no budget in the Long-Term Council Community Plan for any Canada goose management work.

44. Christchurch International Airport Limited (CIAL) advises in its submission to the Wildlife Act review that it has spent \$50,000 over three years on Canada goose monitoring work and cull operations to reduce the hazard Canada geese pose to aircraft. This equates to 14.5 per cent of the amount spent nationwide by fish and game councils over the same period (around \$115,000 per year in direct costs (excluding the costs of staff time)) (source: Page 10, Review of Level of Protection for Some New Zealand Wildlife – Preliminary Findings and Recommendations on Canada goose. Department of Conservation. 12 September 2008). The level of CIAL's expenditure is probably high due to the use of aircraft in their operations.

LEGAL CONSIDERATIONS

45. On the matter of the legal implications and potential liability for the Christchurch City Council, with the Council agreeing to take over management of Canada goose in the Christchurch metropolitan area, legal advice has been provided by the Council's Legal Services Unit. This advice concludes that there is only a low risk of liability to the Council, when and if it takes over management of Canada goose in the Christchurch metropolitan area, provided it carries out appropriate practices.