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# **Report to the Hearing Committee on submissions to the Proposed Regional Pest Management Plan and Taranaki Regional Council Biosecurity Strategy**

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This report has been prepared by officers of the Taranaki Regional Council.

The Taranaki Regional Council has not adopted the recommendations contained within this report. A 'Hearing Committee' of the Council will consider this report, together with written and oral submissions when making its recommendations to the Council.

Taranaki Regional Council  
Private Bag 713  
Stratford

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## **Part One: Introduction**

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## 1. Purpose

The purpose of this report is to present and analyse the decisions sought in submissions on the **Proposed Regional Pest Management Plan for Taranaki** ('the Proposed Plan') and the draft **Taranaki Regional Council Biosecurity Strategy 2017-2037** ('the draft Strategy') to make recommendations for consideration by a 'Hearing Committee' constituted by the Taranaki Regional Council.

## 2. Format of this report

This report is divided into two parts. This part of the report – Part One – introduces the report including its purpose, format, background, an overview of submissions and a brief outline of the approach taken in the reports on submissions contained in Part Two.

Part Two, which constitutes the main body of the report, addresses, for each submission made on the Proposed Plan and draft Strategy:

- the decisions sought in submissions;
- the officers' response to the requests including reasons; and
- the officers' recommendations to the Hearing Committee.

## 3. Background

Under the Biosecurity Act 1993 (the Act), the principal means for undertaking and obtaining funding for future pest management is through the preparation and implementation of pest management plans.

### The Proposed Regional Pest Management Plan

The *Proposed Regional Pest Management Plan for Taranaki* (the RPMP) is the fourth Proposed Plan to be prepared by the Taranaki Regional Council (the Council). It commences a statutory review of the current pest animal and plant strategies. This review ensures the regulatory management of pests in Taranaki remains focused and relevant to the community's expectations for pest management. Once operative, the Proposed

Plan empowers the Taranaki Regional Council to exercise the relevant enforcement and funding provisions available under the Act.

Pursuant to the 2012 amendments to the Act (via the *Biosecurity Law Reform Act 2012*), Council is no longer legally required to publicly notify the RPMP (Section 72). However, given the wide public interest in such matters, Council agreed to the public notification of the proposal to test its proposals against community expectations and address any feedback received. This process involves the receipt of public submissions and a hearing of submissions prior to Council making its final determinations.

The Proposed Plan builds on the success of the current strategies. It identifies and sets out management programmes with respect to the 17 pest species that the Council believes warrant regional intervention and therefore the imposition of obligations and costs on individuals and the regional community (other harmful species will be managed under the Taranaki Regional Council Biosecurity Strategy – refer below). Based upon its section 71 analysis under the Act, the Council is satisfied that:

- the candidate animal and plant species are capable of having adverse effects of regional significance,
- the benefits of their control outweigh the costs, and
- the benefits accrue principally to the region.

Some prioritising has necessarily been required to identify those harmful species of most concern and which meet the 'tests' required of the Biosecurity Act. In its prioritising, the Council recognises that other harmful animals or plants may still be addressed by other forms of intervention, including non regulatory methods, voluntary control, small-scale management programmes (as provided for under section 100V of the Act), or by other parties pursuant to the Biosecurity Act or other relevant legislation.

### The Draft Taranaki Regional Council Biosecurity Strategy 2017–2037

As part of the RPMP review process the Council decided to expand the scope of the

Plan review to also include the preparation of a non-statutory biosecurity strategy. The Council is not required by law to have such a document. However, it does support and complement the Council's RPMP (which only represents a small part of Council activities in relation to 'pest' management. The draft *Taranaki Regional Council Biosecurity Strategy 2017–2037* (the Strategy) covers all of the Council's biosecurity activities and programmes, whether statutory or non-statutory. Most activities undertaken by the Council are discretionary and regulation is only a small part of the Council's overall pest management response.

The Strategy relates to that part of the biosecurity system for which the Council has a mandate to be involved. Other agencies, such as the Ministry for Primary Industries and the Department of Conservation, have separate roles and responsibilities.

The Strategy addresses not only the 17 species for which rules and regulation are deemed appropriate, but also the thousands of other harmful species that warrant different forms of intervention (ranging from advice, biological control, regulation, to the Council itself undertaking direct control).

The Strategy represents a change in business for the Council. Over time, the Council has committed significant resources to the management of legacy (widespread and established) pests impacting on production and biodiversity values. However, through the Strategy, the Council is also seeking to develop initiatives and actions that target harmful organisms before they become a problem (recognising that other agencies also have responsibilities) and to better target Council responses to sites and places where they threaten particular values. The document's overall aim is to identify Council actions that should help the region to become more resilient to pest impacts.

## 4. The submissions

The Proposed Plan and draft Strategy were publicly notified for submissions on 20 May 2017. A total of 10 submissions were received. The closing date for submissions was 20 June 2017.

Of the 10 submissions received, four were from persons or organisations in the region. Three of the four submissions received from persons or organisations in the region were

from organisations representing industry or environmental interests (Federated Farmers, North Taranaki Forest and Bird, and Fish and Game New Zealand. One submission came from a local individual.

Of the six submissions received from outside the region, the Council received submissions from Waikato Regional Council, Taranaki Mouna Project Limited, Predator Free New Zealand Trust, the Morgan Foundation, the Department of Conservation, and KiwiRail Holdings Limited.

In general, the submissions received have been positive. Most indicate support for the RPMP and Strategy, as well as the overall vision, and management approach used to achieve objectives set out in both documents. The main issues raised by submitters related to:

- the species identified as pests and their inclusion in the RPMP (or otherwise)
- support/opposition for Good Neighbour Rules
- new or additional programmes, methods, or rules, or changes to certain rules, and/or wording in the RPMP and Strategy.

## 5. Report on submissions

Part Two of this document contains a report on each of the submissions received.

In some submissions, submitters have not explicitly stated the decision that they wish the Taranaki Regional Council to make. In such cases, the intent of the submission has been considered or inferred from the available information and a response made accordingly. There will be opportunity for submitters to clarify their submissions (if need be) at pre-hearing meetings or at the Hearing.

Changes of a minor nature or to correct errors have been made and included in the re-drafted versions of both the RPMP and Strategy. These include grammatical and typographical errors, and information changes of minor effect. No specific recommendations regarding these changes have been made.

The recommended changes to the RPMP and Strategy by Officers in response to matters



raised in submissions are identified in this document under each individual submission. In addition, all proposed changes can be found in the redrafted version of the RPMP and Strategy.

All changes made in the re-drafted documents are either shown in contrasting typeface (where there are word changes or additions) or by a bubble with deleted text in the margin. The acronym of the submitter requesting the change is given in brackets after the change.



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## **Part Two: Report on submissions**

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# Submission No. 1

Murray Hancock  
4c Antonio Street  
Stratford

## Decision sought

### Section 4 of RPMP: Organisms declared as pests

- (a) Include Sycamore tree as a pest plant.

#### Officers' response

The submitter's comment is noted. Officers agree that Sycamore trees have potential 'pest' characteristics, particularly in relation to biodiversity values. However, the application of rules requiring land occupiers across the region to control the species is considered unnecessarily onerous.

Notwithstanding that, an alternative approach is recommended whereby the Council will provide support and assistance to land occupiers to control the species, particularly in those sites and places identified as regionally significant for their indigenous biodiversity values. Of note, Section 7 of the Strategy includes a suite of non-regulatory measures involving the management of harmful species such as Sycamores, on a site-led basis. Further changes to the Strategy are recommended to explicitly identify Sycamore trees as a harmful species in Appendix 2 (Table 4) of the Strategy for which site-led management programmes are proposed.

#### Recommendation

**Grant the relief in part by amending the Strategy to identify Sycamore trees as a harmful species.**

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## Decision sought

### Section 6.10 of RPMP: Old man's beard

- (b) Control Old man's beard promptly in urban as well as rural areas.

#### Officers' response

The submitter's comment is noted. Submitter's comments have been referred to the Council's Environmental Services Department for action.

#### Recommendation

**No relief necessary.**

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## Decision sought

### Question: Increased focus on eradicating certain named pests

- (c) Support Council increasing its focus on the proposed eradication programme. The submitter further notes that an involved and better informed public could help with eradication.

#### Officers' response

The submitter's comment and support are noted.

#### Recommendation

**No relief necessary.**

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## Decision sought

### Question: Rules requiring land occupiers to maintain low predator numbers

- (d) Supports extending the scope of the Self-Help Possum Control Programme to address other predators such as rats and mustelids and more involvement of urban as well as rural land occupiers.

#### Officers' response

The submitter's comment and support are noted.

#### Recommendation

**No relief necessary.**

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## Submission No. 2

### Waikato Regional Council

Private Bag 3038

Hamilton 3240

## Decision sought

### General:

- (a) Supports the approach and intent of both RPMP and Strategy.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General:

- (b) Supports the division of current and future biosecurity policy matters into 10-year duration regulatory and 20-year non-regulatory documents. The submitter suggested that the Council's streamlined approach *"has set the benchmark for clear-cut and concise splits of the various biosecurity policies and matters in both documents."*

### Officers' response

The submitter's comments and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### General:

- (c) Endorses Council's approach to good neighbour rules and states that, in its opinion, the RPMP's good neighbour rules comply with the National Policy Direction.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### General:

- (d) Notes differences in alignment between the Waikato and Taranaki RPMPs in respect of Pampas management and good neighbour rule boundary clearance (buffer) distances.

### Officers' response

The submitter notes that boundary clearance distances adopted in the Waikato RPMP are different from those proposed in the Taranaki RPMP. The submitter notes that the issues are a historical legacy that the Waikato Regional Council will work through in its impending review.

The submitter further suggested amending Pampas from a sustained control management programme in the RPMP to making it site-led programme in the Strategy. The submitter noted Waikato Regional Council is looking to change its management programme approach for Pampas during their next review.

The submitter's comments are noted. Officers note that the situation regarding Pampas will be dealt with later on in section (o) of this report.

### Recommendation

**No relief necessary.**

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## Decision sought

### Section 3.1: The Management Agency

- (e) Seeks amendment to section 3.1 of the RPMP to add references to section 5.3 (Principal Measures to Manage Pests), Part 3 (Procedures), and to the Council's Operational Plan.

### Officers' response

The submitter supports this section in part but suggests amending section 3.1 of the RPMP to reference section 5.3 (Principal Measures to Manage Pests), Part 3 (Procedures), and the Council's Operational Plan.

Officers agree to amend the references as submitted.

### Recommendation

**Relief is granted.**

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## Decision sought

### Section 4: 'Organisms declared as Pests'

- (f) Seeks following minor amendments to section 4 of the RPMP:
1. Expand text box in Section 4 by adding third bullet point referring to the application of Exemptions under section 78 of the Act.
  2. For each sustained control pest, after the words "Contravention of this rule ... of the Biosecurity Act" add reference to application of Exemptions as outlined elsewhere in the Plan."

### Officers' response

The submitter supports this section in part but suggests minor amendments to section 4 of the RPMP for the purposes of certainty and clarity.

Officers agree in part to the submitter's relief. It is recommended that the text box is amended to refer to exemptions to rules however Officers do not recommend adding references to exemptions in the explanation of every rule as they consider this would be unnecessary detail (given such references are already adequately provided for elsewhere in the RPMP) and would be repetitive.

### Recommendation

**Relief is granted in part.**

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## Decision sought

### Section 4.1: Other Harmful Organisms

- (g) Supports Council's management approach to Yellow bristle grass.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### Section 5.3.3 Service delivery

- (h) Seeks a clearer link age statement in section 5.3.3 of the RPMP in relation to the RPMP and the Strategy.

### Officers' response

The submitter supports this section 5.3.3 of the RPMP in part but suggests a clearer link could be made between the RPMP and the Strategy by addition of a sentence.

The submitter's comment is noted. Officers agree to add additional wording as follows:  
"For further information on surveillance, monitoring, and direct control actions to be taken and eradication targets, refer to section [5] of the *Taranaki Regional Council Biosecurity Strategy 2017–2037*."

### Recommendation

**Relief is granted.**

---

## Decision sought

### Section 6.1: Climbing spindleberry

- (i) Supports Council's management approach to Climbing spindleberry.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.2: Giant reed

- (j) Supports Council's management approach to Giant reed.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.3: Madeira vine

- (k) Supports Council's management approach to Madeira vine despite difficulty in achieving eradication objective.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### Section 6.5: Senegal tea

- (l) Supports Council's management approach to Senegal tea.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### Section 6.6.1: Possums

- (m) Seeks minor amendments in section 6.6.1 of the RPMP to clarify wording and add linkage to Predator Free 2050 Limited and Strategy.

### Officers' response

The submitter supports section 6.6.1 of the RPMP in part but suggests more clarity is needed in the wording. Suggests amend text box to clarify wording and add linkage to Predator Free 2050 Limited and Strategy.

Officers agree to the relief sought and recommend amendments in the text box that delete the final sentence in the second paragraph and the addition of new wording suggested by the submitter.

### Recommendation

**Relief is granted.**

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## Decision sought

### Section 6.7.3: Giant buttercup

- (n) The submitter supports this section in part. Submitter suggests alignment of wording of heading with other similar sub-sections.

### Officers' response

The submitter's comment is noted and agreed to. The heading for Giant buttercup now reads "Plan rules requiring land occupiers and other persons to act".

### Recommendation

**Relief is granted.**

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## Decision sought

### Section 6.11: Pampas

- (o) Seeks amendments to section 6.11 of the RPMP to:
1. delete Pampas as a sustained control management programme in the RPMP and include as a site-led programme in the Strategy; or
  2. in the event that relief to the above is not granted, delete reference to bird spread from the Good Neighbour rule.

### Officers' response

It is the submitter contention that it may not be possible to achieve sustained control of Pampas in the Taranaki region by relying on a Good Neighbour rule. The submitter notes that Pampas seed can blow for up to 25km and therefore the 2km buffer proposed by the Council may not be a realistic way to reduce or minimise adverse impacts. The submitter notes that Pampas continues to thrive in the Waikato region, despite progressive containment management and total control rules in southern areas, including adjacent to the Council's boundary.

The submitter suggests that the site-led (protecting values in places) category in the Strategy is the more appropriate intervention and supports the Council's service delivery programmes in relation to Key Native Ecosystems. The submitter is opposed to the specified buffer distance and notes that the Waikato Regional Council is looking to change their management programme approach for Pampas during their next review.

The submitter's comments are noted. Officers note that other submitters (these being Submission numbers 3 and 6) have sought alternative management programmes for Pampas given concerns around the



efficiency and effectiveness of the proposed compliance programme.

Officers agree that the current Pampas rules impose compliance cost on land occupiers with Pampas on their land. Historically these compliance costs have principally fallen on farmers using Pampas for hedging and shelter belts. Of note farmers are not significantly affected by Pampas because their land is vegetated and Pampas does not grow well on vegetated or modified land. Pampas does not grow well in sub-alpine, or alpine areas either, so it has little impact on the Egmont National Park.

Officers recommend that Pampas is removed from sustained control management under the RPMP and instead be addressed under the Biosecurity Strategy through site-led programmes and activities including pathway management, advice and education, liaison and advocacy, and biological control. The Council would still monitor and control Pampas on Key Native Ecosystem sites.

### Recommendation

**Grant the relief sought by removing Pampas from sustained control management under the RPMP and including it as a "harmful organism" to be managed under the Strategy.**

---

## Decision sought

### General: Linkage of RPMP and Biosecurity Strategy

- (p) Supports the linkages between the two documents and notes that the Biosecurity Strategy complements the RPMP well.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Strategy: Sections 1.4 and 3.3 – Five key priority areas

- (q) Supports the five key priority areas identified in Section 3.3 of the Strategy, which are well aligned with the Waikato Regional Council's own philosophy on pest management.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### Strategy: Section 2.3.4 – Management of pest pathways

- (r) Strongly supports both the regulatory and non-regulatory approaches adopted in the Strategy to enable better management of pest pathways.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Strategy: Section 2.4.2 – Department of Conservation

- (s) Seeks amendment to section 2.4.2 of the Strategy to correct a typo in the first line.

### Officers' response

The submitter's comment is noted and the typo has been amended.

### Recommendation

**Relief is granted.**

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## Decision sought

### Strategy: Section 3.1 – Vision for biosecurity in Taranaki

- (t) Strongly supports the vision proposed in the Strategy.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Strategy: Section 4 – Pathways and exclusion

- (u) Seeks amendment to the RPMP to include a specific Exclusion category of pests to cover, for instance, rooks and wallabies.

### Officers' response

The submitter suggests the benefits of including a specific Exclusion category of pests in the RPMP to cover, for instance, rooks and wallabies. The submitter suggests that including them in the RPMP allows Council officers to access powers under the Act to intervene on private land in case these pests are discovered in Taranaki. The submitter suggests that the risk may be low but a cautionary approach would align better with other North Island councils.

The submitter's comments are noted. Officers note section 4 of the Strategy already includes pathway and exclusion programmes that address the plethora of harmful species, including rooks and wallabies, not yet present in Taranaki. Pursuant to that Strategy the proposed exclusion and pathway programmes focus on the Council undertaking risk assessments, contingency planning and surveillance activities to avoid the introduction or establishment of harmful organisms present in New Zealand but not yet present in the region.

Officers note that access to Part 6 regulatory powers to undertake planning and surveillance activities is not necessary to achieve the objectives of the Strategy in relation to exclusion and pathway programmes. As noted in the Strategy, in the event that a new harmful organism is identified in the region and access to regulatory powers is considered appropriate Council would be able to initiate small-scale management programmes under section 100V of the Act without needing to initiate a Plan review. This is the preferred course of action and provides greater pest resilience to

the region rather than trying to accurately predict which harmful species might emerge in Taranaki over the life of the RPMP.

### Recommendation

**Decline the relief sought.**

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## Decision sought

### Strategy: Section 4.3 and 2.3.4 – Pathway and exclusion targets

- (v) Supports active surveillance for high risk pathways and seeks inclusion of one additional pathway – that of cartage contractors (machinery, stock and equipment) – particularly agricultural contractors who travel between the 3-4 central North Island regions.

### Officers' response

The submitter's comments are noted. Officers suggest amendments to sections 4 and 4.2.2 of the Strategy to highlight pathway risks associated with cartage/agricultural contractors and activities that address those risks.

### Recommendation

**Relief is granted.**

---

## Decision sought

### Question 10 – Community and site-led targets

- (w) Suggests a cautionary approach in the Strategy to extending self-help predator control to rodents or mustelids in line with predator control of possums.

### Officers' response

The submitter suggests a cautionary approach in the Strategy to extending self-help predator control to rodents or mustelids in line with predator control of possums. The submitter notes that the characteristics of rodents and mustelids make it difficult to enforce rules for these species. However, the submitter supports the ideas underpinning the Predator Free 2050 concept and hopes to work with the Council on mutually beneficial projects.

The submitter's comments and support are noted. No change to the Strategy is required. Officers note that pursuant to section 7.2.2 of the Strategy, any predator control rules are subject to public support and

technically feasibility, which would be considered as part of a review or variation to the RPMP in accordance with the Act.

## **Recommendation**

**No relief necessary.**

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## Submission No. 3

### Federated Farmers – Taranaki Province

PO Box 422  
15 Young Street  
New Plymouth

### Decision sought

#### General:

- (a) Notes support for:
  - a. combination and the addition of a non-regulatory Strategy document
  - b. the development of a detailed cost benefit analysis
  - c. the rigorous nature of the process used to identify pests that should be eradicated.

#### Officers' response

The submitter's comments and support are noted.

#### Recommendation

**No relief necessary.**

---

### Decision sought

#### General:

- (b) Notes strong support for the good neighbour rules contained in the RPMP and their application to Crown and private land.

#### Officers' response

The submitter's comments and support are noted.

#### Recommendation

**No relief necessary.**

---

### Decision sought

#### Pampas grass

- (c) Seeks the removal of Pampas from sustained control list and inclusion in Strategy instead.

#### Officers' response

The submitter is opposed to a sustained control management programme for Pampas and recommends that Pampas be removed from the RPMP and instead be addressed by targeted site-led programmes in the Strategy alongside other harmful environmental plants. The submitter highlighted that the plant was not a problem in most areas (and has beneficial attributes) yet the two kilometre buffer distance in the good neighbour rule captures most properties in Taranaki. The submitter suggests that the education of landowners on the best way to manage Pampas will likely be all that is required going forward.

The submitter's comments and concerns are noted. Officers note that other submitters (these being Submission numbers 2 and 6) have also sought alternative management programmes for Pampas given concerns around the efficiency and effectiveness of the proposed compliance programme.

Officers agree that current Pampas rules create significant compliance cost on land occupiers with Pampas on their land. Historically these compliance costs have principally fallen on farmers using Pampas for hedging and shelter belts. Of note farmers are not significantly affected by Pampas because their land is vegetated and Pampas does not grow well on vegetated or modified land. Pampas does not grow well in sub-alpine, or alpine areas either, so it has little impact on the Egmont National Park.

Officers recommend that Pampas is removed from sustained control management under the RPMP and instead be addressed under the Biosecurity Strategy through site-led programmes and activities including pathway management, advice and education, liaison and advocacy, and biological control. The Council would still monitor and control Pampas on Key Native Ecosystem sites.

#### Recommendation

**Grant the relief sought by removing Pampas from sustained control management under the RPMP and including it as a "harmful organism" to be managed under the Biosecurity Strategy.**

---

## Decision sought

### General: Extension of Self-help Possum Control Programme

- (d) Supports proposals in the RPMP and Strategy to expand the Self-help Possum Control Programme to urban areas and to target rats and mustelids. The submitter further supports Council's intention to seek co-funding for Wild for Taranaki and Taranaki Mounga projects.

### Officers' response

The submitter's comments are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Old man's beard

- (e) Supports extension of self-help programme principles to Old man's beard along Kaupokonui Stream and Waingongoro River. Notes this is an excellent example of the partnership approach that the Council is recognised for in the farming community and thanks the Council for their proactive engagement on the issue.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Yellow bristle grass

- (f) Seeks support that the Council either:
- Make Yellow bristle grass (YBG) a sustained control management pest in the RPMP; OR
  - Accept its inclusion in the Strategy, in the list of 'other harmful organisms', for which regulatory control is not deemed appropriate.

### Officers' response

The submitter notes that YBG is a serious concern to many Taranaki farmers. Although the submitter recognises that eradication is no longer feasible, it considers that there is still an opportunity to prevent the further spread of YBG, particularly into the eastern hill country. This area is of particular concern because the usual control options of spraying out and re-grassing are much harder or impossible in the hill country.

The submitter acknowledges the financial implications, both to Council and farmers, if rules (via the RPMP) were to apply. The submitter suggests an alternative to including YBG in the RPMP would be to place YBG in the Strategy. However, the submitter is seeking an intensification of efforts on controlling the spread of YBG into new areas noting that they need to be confident that such an approach is not simply a monitoring response or a continuation of previous (so-far largely ineffective) measures. The submitter notes that the current list of actions mentioned in the Strategy may be a useful starting point.

The submitter's comments and concerns are noted. Officers agree with the submitter that not all effective pest plant management needs to be subject to regulatory management. The inclusion of YBG and the application of rules to control the plant would indeed impose significant costs on farmers and others despite limited effective control options being available to land occupiers. Officers therefore prefer the submitter's alternative option of addressing YBG via the Strategy with a suite of programmes and actions that intensify efforts of working with others to prevent the further spread of the plant.

Officers recommend the inclusion of a new section 8.2.5 of the Strategy (and other consequential changes) that explicitly addresses managing the spread of YBG through a suite of dedicated programmes and activities that represent an intensification of efforts to prevent the further spread of YBG in the region.

### Recommendation

**Grant the relief by amending the Strategy to include new section on programmes and activities explicitly targeting YBG.**

---

## Decision sought

### General: Strategy Vision, principles and priority areas

- (g) Supports the Strategy's vision, principles and priority areas and the Council's cooperative, integrated, scientific and socially-mandated approach..

### Officers' response

The submitter's comments and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Strategy: Wider biosecurity framework outside Council

- (h) Supports the Council's approach of not duplicating work of other agencies and adding value where appropriate.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Strategy: Risk assessments and contingency planning

- (i) Agrees in principle with the Strategy's increased focus on surveillance and pathway management. Supports proactive work on potential invasive pests as long as there are existing resources to do this without compromising effective management of important pests already in Taranaki.

### Officers' response

The submitter's comments are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Strategy: Other leadership responses

- (j) Supports the Council's promotion of alignment of regional pest management.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Plan section 3.3.4: Road reserves

- (k) Supports Council's approach of making roading authorities responsible for formed roads and land occupiers responsible for any paper roads on their land.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

# Submission No. 4

## Morgan Foundation

PO Box 19218  
Wellington 6149

## Decision sought

### General:

- (a) Commends Council on a comprehensive and detailed Plan.

### Officers' response

The submitter's comment is noted.

### Recommendation

**No relief necessary.**

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## Decision sought

### Section 6: Feral cats: Pest descriptions and programmes

- (b) Supports inclusion of feral cats in the RPMP (Appendix 2 of the Proposed Plan) as a site-led pest and agrees that there are sensitive wildlife areas where it is essential for cats to be managed to achieve biodiversity outcomes.
- (c) Seeks changes to Table in Appendix 2 of the RPMP to define 'feral cat' and would like to see a clearer definition of feral cat so that cats can be managed in sensitive wildlife areas near populated areas. Noted that an appropriate definition would define a feral cat as any cat without a microchip, collar, or harness.
- (d) Seeks mention of toxoplasmosis in the description of the problem for feral cats.

### Officers' response

The submitter's comments are noted.

Officers recognise the submitter's concerns relating to feral cat management and in response to submissions are recommending changes to the Strategy to ensure site-led and landscape predator control programmes target feral cats. Cats will also be controlled directly by the Council, through the Strategy, in Key Native Ecosystems. However as a result of the pest management review undertaken since 2013, Officers do not recommend the imposition of rules for feral cats in the RPMP due to their widespread dispersal, the unenforceability of rules pertaining to abandonment,

release, and control, and their assessment that land occupiers and other interested parties are better placed to make decisions on whether or not it is necessary to undertake control.

Officers note that in accordance with section 100G(4) of the Act, inconsequential amendments have been made to the revised Proposed Plan to focus more clearly on only those species declared to be pests and for which a regulatory approach has been adopted. Accordingly material in the Table relating to other harmful organisms including feral cats has been transferred and inserted into Appendix 2 of the Strategy. In response to the submitter's comments, officers have enhanced that material to include reference to toxoplasmosis.

Officers have further inserted a definition of 'feral cat' into the Biosecurity Strategy based upon that proposed in the *National Cat Management Strategy (2017)*, which reads as follows:

Feral cats: these cats are unowned, unsocialised, and have no relationship with or dependence on humans.

### Recommendation

**Grant the relief in part by amending the Strategy.**

---

## Decision sought

### Section 6: Feral cats: Pest descriptions and programmes

- (e) Notes that there is no mention about the creation or support of cat colonies, or cat abandonment, in the RPMP or Strategy and that "*there are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies.*"

### Officers' response

The submitter's comments are noted. No changes to the RPMP are considered necessary.

Officers share the submitter's concerns around the risks posed by cat colonies to nearby biodiversity values. It is suggested that section 8.2.4 of the Strategy be amended to provide for this Council to support local government advocacy for extra powers to protect wildlife from cats including microchipping, de-sexing and registration. Officers recommend, where the opportunity arises, that Council submit to central government to support initiatives to develop national cat management legislation.

### Recommendation

**Grant the relief in part by amending the Strategy.**

---

## Decision sought

### General: Expansion of predator control

- (f) Seeks expansion of the Self-Help Possum Control Programme to include feral cats.

### Officers' response

The submitter supports expansion of the Self-Help Possum Control Programme to include other predators however it notes feral cats are not included. The submitter questions this given "*... the devastating effect they have on our native species and the disease risk they bring to primary production*". The submitter suggests that feral cats will undermine the biodiversity outcomes of any predator control work if they are not included.

The submitter's comment is noted. Officers recommend that section 7.2.2 of the Strategy be amended to identify and include feral cats within Council programmes related to landscape predator control on the ring plain.

### Recommendation

**Grant the relief by amending the Strategy to identify and include feral cats within Council programmes related to landscape predator control on the ring plain.**

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## Submission No. 5

### Predator Free New Zealand Trust

C/- Rebecca Bell

Level 1, 190 Taranaki Street

Wellington 6011

## Decision sought

### General:

- (a) Commends Council on a comprehensive and detailed RPMP.

### Officers' response

The submitter's comments are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6: Feral cats: Pest descriptions and programmes

- (b) Supports inclusion of feral cats as a site-led pest in the RPMP (Appendix 2 of the RPMP)
- (c) Seeks management of feral cats near populated areas
- (d) Seeks a clearer definition of feral cat to include one without a microchip or with a microchip that is caught more than once.
- (e) Seeks mention of toxoplasmosis in the description of the problem.

### Officers' response

Submitter supports inclusion of feral cats in the RPMP as a site-led pest and seeks management of feral cats near populated areas as *"there is currently no easy way to manage unowned cats in areas of ecological significance that are near populated areas."*

Submitter further seeks a clearer definition of feral cat to include one without a microchip or with a microchip that is caught more than once. The submitter also wants mention of toxoplasmosis in the description of the problem.

Officers recognise the submitter's concerns relating to feral cat management and in response to submissions are recommending changes to the Strategy to ensure site led and landscape predator control programmes target feral cats. Cats will also be controlled directly by

the Council, through the Strategy, in Key Native Ecosystems. However as a result of the pest management review undertaken since 2013, Officers do not recommend the imposition of rules for feral cats in the RPMP due to their widespread dispersal, the unenforceability of rules pertaining to abandonment, release, and control, and their assessment that land occupiers and other interested parties are better placed to make decisions on whether or not it is necessary to undertake control.

Officers note that in accordance with section 100G(4) of the Act, inconsequential amendments have been made to the revised Proposed Plan to focus more clearly on only those species declared to be pests and for which a regulatory approach has been adopted. Accordingly material in the Table relating to other harmful organisms including feral cats has been transferred and inserted into Appendix 2 of the Strategy. In response to the submitter's comments, officers have enhanced that material to include reference to toxoplasmosis.

Officers have further inserted a definition of 'feral cat' into the Biosecurity Strategy based upon that proposed in the *National Cat Management Strategy (2017)*, which reads as follows:

Feral cats: these cats are unowned, unsocialised, and have no relationship with or dependence on humans.

### Recommendation

**Grant the relief in part by amending the Strategy.**

---

## Decision sought

### Section 6: Feral cats

- (f) Seeks that ecologically sensitive areas be defined as such so that cats can be managed in and around those areas.

### Officers' response

The submitter suggests that ecologically sensitive areas need to be defined as such in the RPMP so that cats can be managed in and around those areas.

In relation to the RPMP or Strategy defining ecologically sensitive areas officers recommend declining the relief sought. A definition may have been necessary for the purposes of legal certainty and clarity if linked to a rule in a RPMP. However as noted in the response to submission point (g) below, Officers do not recommend the imposition of rules for feral cats.

For the purposes of the Strategy (in which rules do not apply) a legal definition of ecologically sensitive areas is also not necessary or appropriate. The Strategy refers to Council programmes and activities that will address

the protection of 'ecologically sensitive areas', (which includes Key Native Ecosystems, wetlands, dunelands, native forests and scrublands) not just at a site level but at a landscape level. This provides for more comprehensive feral cat control and it would not be useful to limit feral cat control to a small finite number of legally defined areas.

#### **Recommendation**

**Decline the relief sought.**

---

## **Decision sought**

### **General:**

- (g) Seek the inclusion of rules in the RPMP preventing the establishment or maintenance of cat colonies and for the abandonment of unwanted cats.

### **Officers' response**

The submitter would like to see rules in the RPMP preventing the establishment or maintenance of cat colonies. It is stated that other councils (Tasman and Greater Wellington) are proposing to include cat colonies in their plans. The submitter seeks additional rules about abandoning unwanted cats.

Officers do not recommend the inclusion of rules in the RPMP to prevent the establishment or maintenance of cat colonies. It is the Officers' view that such rules could be more appropriately addressed by district councils through bylaws and would be difficult to enforce under the BSA.

Officers note that in respect of the current rule in Greater Wellington's RPMP, the ability to protect biodiversity values is dependant upon the land occupier's preferences: *"No person shall support or encourage feral and/or unwanted cat colonies on private land without the landowners/occupier's express permission.* If a land occupier is 'sympathetic' to supporting or encouraging a cat colony there is no ability to enforce this rule. If a land occupier does not support or encourage the cat colony the rule is redundant. In Taranaki, land occupiers who wish to control cats can do so at any time and the Council already provides support, including traps and advice and information.

Notwithstanding the above, officers share the submitter's concerns around the risks posed by cat colonies to nearby biodiversity values and recommend alternative actions to discourage the establishment or maintenance of cat colonies and allow more effective feral cat control. It is suggested that section 8.2.4 of the Strategy be amended to provide for this Council to support local government advocacy for extra powers to protect wildlife from cats including microchipping, de-

sexing and registration. Officers recommend, where the opportunity arises, that Council submit to central government to support initiatives to develop national cat management legislation. Officers further recommend that section 7.2.2 of the Strategy be amended to identify and include feral cats within Council programmes related to landscape predator control on the ring plain.

#### **Recommendation**

**Decline the relief.**

---

## **Decision sought**

### **General: Strategy: Expansion of self-help possum control to other predators**

- (h) Seeks expansion of predator control programmes to target feral cats at a landscape scale.

### **Officers' response**

The submitter support expansion of the Self-help Possum Control Programme to include predator control but would also seek the targeting of feral cats given their devastating effect on biodiversity. The submitter notes that in similar programmes undertaken in the Hawke's Bay area they are catching many more feral cats than mustelids.

The submitter recognises that farmers are busy and may not have time to do the feral cat control work sought. They suggest a funding option might be to charge an additional levy on rateable land and use the funds to pay contractors to maintain predator levels. They note other councils (Hawke's Bay and Northland regional councils) have done this.

The submitter's comments and support are noted. As noted above, Officers recommend that section 7.2.2 of the Strategy be amended to identify and include feral cats within Council programmes related to landscape predator control on the ring plain.

#### **Recommendation**

**Grant the relief by amending the Strategy to identify and include feral cats within Council programmes related to landscape predator control on the ring plain.**

---

## Decision sought

### Strategy: 7.2.3 – Urban projects

- (i) Seeks that the Urban Possum Control Programme be expanded to include rats, mustelids and feral cats in urban areas.

### Officers' response

The submitter seeks Council support for urban communities to control a range of predators rather than the current focus in section 7.2.3 of the Strategy on possums.

The submitter's comments are noted. Sections 7.2.2 and 7.2.3 of the draft Strategy currently address landscape predator control (which includes rats, mustelids and now feral cats) and urban possum control. Officers recommend minor changes to these sections to clarify that predator control is proposed across both rural and urban landscapes.

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Strategy: 7.2.5 – Community and Site-led biodiversity programmes

- (j) Supports Council's work with community groups and individuals to control predators on private land and agrees that Council has a key role to play in providing education and advice and potentially access to equipment.
- (k) Seeks that where Council is funding conservation groups, that it takes the recent comments of the Parliamentary Commissioner for the Environment (PCE) into account (in the report *Taonga of an Island Nation*), which states that "*funding organisations should give priority to groups that have already made significant conservation gains to ensure the gains are not lost.*" Also comments that funding should be secure over a number of years and that "targeted support for, and better coordination of, community groups would make this great collective effort more effective and more rewarding for those involved."

### Officers' response

The submitter's comments and support are noted.

With respect to funding, Officers note the Council's record of working with other groups to promote biodiversity outcomes across that region as demonstrated by the development, review and

implementation of its Biodiversity Strategy (2008 and 2017), the establishment and support for the Taranaki Biodiversity Accord and Wild for Taranaki, and through its funding and provision of other support to groups undertaking biodiversity work and projects of regional significance. It is the Council's long and established practice to fund groups that have already made significant conservation gains. Such examples include the Taranaki Tree Trust, the Rapanui Petrel Trust, Rotokare Trust and East Taranaki Environment Trust. In effect this Council has been implementing the PCE's recommendation for sometime. Council will continue to explore any opportunities to enhance the coordination of community groups involved in this work.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Strategy General: Riparian planting benefits

- (l) Seeks the inclusion of riparian planting initiatives to provide bird corridors for safe migration of bird species in Council's plans.

### Officers' response

The submitter notes that PCE report referred to above also discusses the potential for riparian planting to provide bird corridors for safe migration of bird species and seeks inclusion of this in Council's plans and encourages the Council to consider this in their plans.

The submitter's comment is noted. Officers note that the Council has, for some time, been implementing the Taranaki Riparian Management Programme. This non regulatory programme is international in scale involving 2687 properties and 14,921 kilometres of streambanks. To date the programme has resulted in 4,650 kilometres of additional fencing and 2,554 kilometres of riparian planting. The Programme is already identified and supported in the Council's Long Term Plan, Regional Policy Statement, Regional Freshwater Plan, Soil Plan and Biodiversity Strategy.

Of note, the potential for riparian planting to provide bird corridors for safe migration of bird species is explicitly recognised in the Council's Biodiversity Strategy 2017.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Strategy: Appendix 1: Summary of the means for achieving individual pest management objectives

- (m) Seeks inclusion of rats and hedgehogs in list of harmful species for site-led programmes set out in Appendix 1 of the Strategy.

### Officers' response

The submitter's comment is noted. Officers note that Appendix 1 of the Strategy has been supplemented by a more comprehensive table of material transferred from the RPMP. This list includes rats and hedgehogs.

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Strategy General:

- (n) Seeks that Council approach Government to develop national cat management legislation that, at a minimum, would include compulsory de-sexing, microchipping, limits on cat ownership, breeder registration, rules on cat abandonment and establishment and maintenance of cat colonies.

### Officers' response

Officers agree to the submitter's relief. Officers suggest that section 8.2.4 of the Strategy be amended to provide for this Council to support local government advocacy for extra powers to protect wildlife from cats including microchipping, de-sexing and registration. Officers also recommend, where the opportunity arises, that Council submit to central government to support initiatives to develop national cat management legislation.

### Recommendation

**Grant the relief sought.**

---

# Submission No. 6

## Department of Conservation

55A Rimu Street  
New Plymouth 4312

## Decision sought

### Section 1.2: Plan Establishment:

#### Purpose

- (a) Seek amendment to paragraph 2 of section 1.2 of the RPMP to state:  
*"Many organisms in the Taranaki region, or which could infest the Taranaki region, are considered undesirable or a nuisance. For some of those organisms it is considered that a pest management plan will add significant value to the region by providing for their eradication or effective management, and that value will exceed the value derived from uncoordinated individual actions (or inaction)."*

#### Officers' response

The submitter considers that the following statement misrepresents the purpose of having a plan: *"There are many organisms in the Taranaki region considered undesirable or a nuisance. However, it is only where an individual's pest management actions or inaction impose undue effects upon others that regional management is warranted."* The submitter's contention is that the wording misrepresents the legislation and seeks the following wording:

*"Many organisms in the Taranaki region, or which could infest the Taranaki region, are considered undesirable or a nuisance. For some of those organisms it is considered that a pest management plan will add significant value to the region by providing for their eradication or effective management, and that value will exceed the value derived from uncoordinated individual actions (or inaction)."*

The wording sought to be replaced by the submitter was developed as part of a sector approach to promote alignment in the content matter of RPMP across New Zealand. There is a risk that too many minor wording changes across RPMP processes across New Zealand may ultimately undermine that alignment. Notwithstanding that the word changes sought by the submitter are minor so it is recommended that the relief be granted.

#### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 2.1: Strategic background

- (b) Seek amendments to section 2.1 of the RPMP to more clearly describe the regional economic, biodiversity and cultural planning instruments that provide the rationale for pest management.

#### Officers' response

The submitter considers that the place of the RPMP in the strategic landscape for Taranaki could be enlarged upon.

The submitter further considers that the following statement is an incorrect representation of the relationship between values and pest management planning: *"Several planning or operational activities contribute to the overall efficiency in reducing pest impacts on the region's economic, environmental, social and cultural values."* The submitter suggests the paragraph need to be reviewed to more clearly describe the regional economic, biodiversity and cultural planning instruments that provide the rationale for pest management.

Officers suggest that the more appropriate place for describing the strategic landscape for Taranaki is in the Strategy, which includes such a description. Section 2.1 of the RPMP aims to be a high level overview, rather than a detailed description of the strategic pest/biosecurity framework.

Officers note that they have reviewed the relevant section and, as a result, amendments have been made to remove unnecessary detail in this section of the RPMP (noting that the additional material sought by the submitter is covered in the Strategy). This is consistent with changes elsewhere for the final RPMP to align with the content requirements of a Plan as set out in section 73 of the Act.

#### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 2: Planning and statutory background

- (c) Seeks amendment to Section 2 of the RPMP to identify the wider Taranaki pest management “landscape” and to include a textural or pictorial link to the full picture of pest management undertaken or contributed to by publicly-funded agencies in Taranaki.

### Officers’ response

The submitter suggests identifying the wider Taranaki pest management “landscape”, in the RPMP and submits that the Plan could be enhanced by providing a textural or pictorial link to the full picture of pest management undertaken or contributed to by publicly-funded agencies in Taranaki. The submitter offers to supply spatial data relating to its programmes if the submission is accepted.

Officers suggest that material similar to that sought by the submitter is already included in the Strategy and do not believe it is necessary to replicate it in the RPMP. Refer to previous discussion in (b) above.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 2.2.1 – “Part 5: Managing pests and harmful organisms” and “Part 2: Functions, powers and duties in a leadership role”

- (d) Seeks expanded commentary in section 2.2.1 of the RPMP on “Unwanted Organisms” including a description on additional layers of pest management provided by National Pest Plant Accord (NPPA) and noxious fish status, powers of TRC staff to access, and a summary of occupier obligations with respect to unwanted organisms and noxious fish.

### Officers’ response

The submitter seeks expanded commentary in section 2.2.1 of the RPMP on “Unwanted Organisms” including a description on additional layers of pest management provided by National Pest Plant Accord (NPPA) and noxious fish status, powers of Council staff to access, and a summary of occupier obligations with respect to unwanted organisms and noxious fish.

The submitter contends that a description of the linkages between the classifications would enhance the linkages between the RPMP and these other mechanisms for managing harmful organisms. Such descriptions would highlight to occupiers the limitations that are imposed upon them by national pest management decisions / policies.

Officers suggest that additional commentary sought by the submitter has already been separately provided for in sections 2.3.5 (Small-scale management programme), 2.4.1 (Ministry for Primary Industries), and 2.4.2 (Department of Conservation) of the Strategy, which includes linkages to further information. Officers do not believe it is necessary to replicate it in the RPMP. Refer to previous discussions in (b) and (c) above.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 2.2.4: Wild Animal Control Act 1977 and the Wildlife Act 1953

- (e) Seeks correction of clause 2.2.4(b) of the RPMP to delete reference to ferrets being able to be kept and bred in captivity even if they are declared a pest.

### Officers’ response

The submitter seeks amendment to section 2.2.4 of the RPMP to recognise that as ferrets are classified as unwanted organisms, they cannot be kept in captivity and bred without specific authority. Officers agree and will delete reference to ferrets in this sub-section.

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 2.3: Relationship with other pest management plans

- (f) Seeks the addition of the word “collaboration” after “consultation” in the second paragraph of section 2.3 of the RPMP.

### Officers’ response

The submitter seeks the addition of the word “collaboration” after “consultation” in the second paragraph of section 2.3 of the RPMP to read “... will be



achieved through a process based on consultation, collaboration, and communication between the Taranaki Regional Council and the relevant agency." The submitter contended that "collaboration" would add strength to the suite of actions proposed to ensure coordination in pest management matters in Taranaki.

The wording sought by the submitter to be amended was developed as part of a sector approach to promote alignment in the content matter of RPMP across New Zealand. There is a risk that too many minor wording changes across RPMP processes across New Zealand may ultimately undermine that alignment. Notwithstanding that the word changes sought by the submitter are minor so it is recommended that the relief be granted.

## Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 3.3: Crown agencies

- (g) Seeks amendment to the description of a good neighbour rule set out in section 3.3 of the RPMP.

### Officers' response

The submitter suggests that the description of a good neighbour rule contained in this section is incorrect and suggests amended wording as follows: "*A good neighbour rule responds to the issues caused when a land occupier imposes unreasonable costs on an adjacent land occupier who is actively managing a certain pest, by not undertaking management, or sufficient management, of that pest.*" It is the submitter's contention that the rewording more accurately reflects the Act and the National Policy Direction 2015.

The wording sought by the submitter to be replaced was developed as part of a sector approach to promote alignment in the content matter of RPMP across New Zealand. There is a risk of too many minor wording changes across RPMP processes across New Zealand may ultimately undermine that alignment. Notwithstanding that the word changes sought by the submitter are minor and do not change the Council's intent so it is recommended that the relief be granted.

## Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 3.3.1: Department of Conservation

- (h) Seeks amendment to the second paragraph of section 3.3.1 of the RPMP to include a description of restrictions on spreading or holding particular pest fish.

### Officers' response

Item 8 of the submission relates to the treatment of pest fish previously covered in the current RPMP. The submitter suggests that the second paragraph of this section needs to be reviewed and amended to include a description of restrictions on spreading or holding particular pest fish.

Officers have reviewed the section and as a result suggest minor amendments to include a description of restrictions on spreading or holding particular pest fish of concern to the Department of Conservation. Officers also note that Council programmes and activities relevant to pest fish management are addressed in the Strategy

## Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 3.3.1: Department of Conservation

- (i) Seeks that the current pest status and rules for Brown bull-headed catfish be retained.

### Officers' response

Item 9 of the submission relates to the treatment of pest fish previously covered in the current RPMP. The submitter submits that Council should consider maintaining the current pest status and rules for Brown bull-headed catfish, recognising that the species could be deliberately spread to waterways from adjacent regions, and that Council manage the pest by way of an 'exclusion' management programme.

As outlined in section 3.3.1 of the RPMP the Department of Conservation has statutory responsibilities for managing freshwater fisheries. Lead responsibility for pest fish incursions more appropriately lies with the Department rather than the Council.

Officers do not therefore recommend making changes to the RPMP. Notwithstanding that, pathway and

exclusion management are one of five priority areas included in the Strategy.

Officers note that this Council has regularly supported and assisted the Department of Conservation with respect to pest fish surveillance and eradication activities in Taranaki and proposes to continue to do so through exclusion and pathway programmes outlined in section 4 of the Strategy. Officers therefore recommend making an amendment to section 4.2.2 of the Strategy to include a new action that states this Council will work with relevant biosecurity agencies such as the Department of Conservation on surveillance and exclusion of harmful species not present yet in Taranaki, including Brown bull-headed catfish. If the Department is interested, it is proposed that Council work with the Department to carry out a risk assessment, including the identification of appropriate management responses pursuant to section 4.2.1 of the Strategy.

### **Recommendation**

**Grant the relief sought in kind by amending section 4.2 of the Strategy.**

---

## **Decision sought**

### **Section 3.3.1: Department of Conservation**

- (j) Seeks that Council exclude pest fish species in conjunction with the Department of Conservation from the region, if it is not present, or to eradicate it from the region if it is present and it is feasible to do so, or otherwise contain the species.

### **Officers' response**

The submitter submits that either former section 3.3.2.1 or section 7 of the RPMP be amended to include an undertaking that Council will support the management of pest fish species in conjunction with Department of Conservation to either exclude a species from the region, if it is not present, or to eradicate it from the region if it is present and it is feasible to do so, or otherwise contain the species.

As per Officer comments in (h) and (i) above, Officers recommend making minor amendment to section 4.2.2 of the Strategy to include a new action that states this Council will work with relevant biosecurity agencies such as the Department of Conservation on surveillance and exclusion of harmful species not present yet in Taranaki, including Brown bull-headed catfish. If the Department is interested it is further proposed that Council work with the Department to carry out a risk assessment, including the identification of appropriate management responses by the relevant

parties pursuant to section 4.2.1 of the Strategy. This may include the development of a Memorandum of Understanding.

### **Recommendation**

**Grant the relief sought in kind by amending section 4.2 of the Strategy.**

---

## **Decision sought**

### **Section 4: Organisms declared as pests – Brown bull-headed catfish**

- (k) Seeks that Brown bull-headed catfish be included as a pest in the RPMP.

### **Officers' response**

The submitter's comment is noted. As per the comments in (h), (i) and (j) above, Officers do not recommend changes to the RPMP and suggest that such matters are more appropriately addressed in the Strategy. Officers recommend minor amendment to section 4.2 of the Strategy to include a new action that states this Council will work with relevant biosecurity agencies such as the Department of Conservation on surveillance and exclusion of harmful species not present yet in Taranaki, including Brown bull-headed catfish.

### **Recommendation**

**Decline the relief sought.**

---

## **Decision sought**

### **Section 4: Organisms declared as pests – Darwin's barberry**

- (l) Seeks that Darwin's barberry be included as an eradication pest in the RPMP, at least to the west of the pest management line.

### **Officers' response**

No change to the RPMP is recommended. Officers do not believe the eradication objective sought for Darwin's barberry is technically achievable given the species is well established in the region (unlike the other proposed eradication species). Also of note is that many infestations are in difficult to access locations and control is costly.

Officers note that there are a plethora of issues and intervention options for managing the thousands of potentially harmful species. Eradication type objectives and/or the regulatory approaches are not always appropriate and any decisions must be balanced



against other priorities. As part of this Plan review Officers assessed future management and funding options for Darwin's barberry. It is the view of Officers that Darwin's barberry is better addressed through site-led programmes as part of the Strategy.

### **Recommendation**

**Decline the relief sought.**

---

## **Decision sought**

### **Section 4: Organisms declared as pests – Climbing asparagus**

- (m) Seeks that Climbing asparagus s be included as an eradication pest in the RPMP, west of State Highway 3.

### **Officers' response**

The submitter suggests that considerable progress has been made to eradicate Climbing asparagus in the Kaitake Ranges and that by declaring the plant to be an eradication pest it would encourage nearby private land occupiers to undertake proactive control.

No change to the RPMP is recommended. Officers do not believe that the programme as outlined by the submitter is likely to achieve any eradication objective. Climbing asparagus is already too widespread in the region to support an eradication objective and reliance on advocacy (and/or private land occupiers to undertake the control to the level required) is unlikely to be effective.

Of note under section 7.2.5 of the Strategy Council has set out a suite of programmes and actions where this Council is willing to work with relevant biosecurity agencies such as the Department of Conservation on the control of harmful species, including Climbing asparagus.

### **Recommendation**

**Decline the relief sought.**

---

## **Decision sought**

### **Section 4.1: "Other Harmful Organisms – Feral cats**

- (n) Supports the site management or pathway approach for species not otherwise classified as pests, including feral cats.
- (o) Seek amendments to section 4.1 of the RPMP to include more detail identifying the likely pest management approach to be taken for other harmful organisms and by noting any existing restrictions on ownership or spread of these pests that may exist as a consequence of them being classified as Noxious Fish or Unwanted Organisms.

### **Officers' response**

The submitter supports for the site management or pathway approach for species not otherwise classified as pests, including feral cats (notwithstanding their advocacy for inclusion of pest fish, Darwin's barberry, and Climbing asparagus as pests) is noted.

The submitter suggests that section 4.1 of the RPMP could be enhanced by the inclusion of more detail identifying the likely pest management approach to be taken – i.e. whether pathway or site-led - and by noting any existing restrictions on ownership or spread of these pests that may exist as a consequence of them being classified as Noxious Fish or Unwanted Organisms. Officers note that Table 4 has been removed to keep the Plan solely regulatory, and transferred to the Strategy, as Appendix 2. The Strategy provides the detail sought by the submitter in terms of likely management approaches.

### **Recommendation**

**No relief necessary.**

---

## **Decision sought**

### **Section 5: Pest management framework**

- (p) Supports the structure and content of section 5 of the RPMP, particularly provisions 5.3.4 and 5.4.

### **Officers' response**

The submitter's comment and support are noted.

### **Recommendation**

**No relief necessary.**

---

## Decision sought

### Section 6.1: Eradication species: Climbing spindleberry

- (q) Supports the eradication approach towards Climbing spindleberry.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.3: Eradication species: Madeira vine

- (r) Supports the eradication approach towards Madeira (mignonette) vine.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.5: Eradication species: Senegal tea

- (s) Supports the eradication approach towards Senegal tea.

### Officers' response

The submitter's comment and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.6: Sustained Control species: Possums

- (t) Seeks that the extent of the Self-help Possum Control Programme be confined to the boundary as it stands at present.

### Officers' response

The submitter provides qualified support for the sustained control programme for possums as described in section 6.6 of the RPMP and the Council's ongoing commitment to the restoration programme for Taranaki Mounga. The submitter's qualification relates to concerns that the boundaries of the Self-help Possum Control Programme may expand over time and there is insufficient certainty to land occupiers as to whether a rule applies to them.

The submitter's qualified support is noted. In relation to confining the boundaries of the Self-help Possum Control Programme, which may expand over time, Officers recommend declining the relief. Officers note that this Plan is the fourth plan of its type. The current extent of the Self-help Possum Control Programme provides effective and sustained possum control over much of the ring plain and coastal terraces. This was achieved over the life of four plans whereby Council has been able to incrementally increase the extent of the area covered by the Programme over time. To date there have been no issues with land occupiers not being clear as to whether possum control rules apply to them and/or uncertainty as to where the Programme boundary lies.

Officers note that it is Council practice, as set out in section 6.3.3 of the RPMP that any new areas included in the Programme are contingent upon 75% of private land occupiers covering 75% of the land area targeted agreeing to be in the Programme.

As part of that land occupier engagement all private occupiers are individually contacted and consulted with, in relation to being in the programme and the application of rules, with this contact being maintained on an ongoing basis. The submitter may be concerned that additional good neighbour responsibilities may be applied to them through the potential expansion of the Programme. However, the implications of any obligations on the submitter arising from any Programme expansion are likely to be very minor given that the ring plain is already covered by the Programme and that the rule specifically excludes properties east of the Programme.

### Recommendation

**Decline the relief sought.**

---

## Decision sought

### Section 6.7: Sustained control species: Giant buttercup

- (u) Seeks the removal of the Good Neighbour Rule for Giant buttercup.

#### Officers' response

It is the submitter's contention that the good neighbour rule for Giant buttercup is inappropriate and inconsistent with legislation and the National Policy Direction.

Officers disagree with the submitter's views and do not recommend granting the relief. Council's impact evaluation and cost benefit analysis, including assumptions, underpinning the proposed good neighbour rule are documented in the Section 71 report. The submitter has not provided any additional information to demonstrate that the underpinning assumptions were wrong or incorrect.

Of note, in order to ensure costs are indeed reasonable, the Council on behalf of all regional councils commissioned *Landcare Research* to provide advice on the appropriate boundary distance to manage pest plant species, having regard to their biological characteristics and dispersal distances. The 5m buffer distance proposed for Giant buttercup is consistent with that advice.

The submitter's comments that the spread of Giant buttercup is principally due to seed distribution in hay or hay balers, does not mean that other forms of dispersal do not apply, or preclude the application of Good Neighbour Rules.

Good Neighbour Rules are intended to prevent a land occupier imposing unreasonable pest management costs on their neighbour where they are managing the relevant pest. The submitter questions the reasonableness of having Good Neighbour Rules for a number of production pests but does not challenge the reasonableness of having Good Neighbour Rules for environmental pests. It is important to note that the RPMP is a regional plan that should address a broad range of values of importance to this community, including economic.

#### Recommendation

**Decline the relief sought.**

---

## Decision sought

### Section 6.8: Sustained control species: Giant gunnera

- (v) Seeks that rules relating to Giant gunnera not apply to coastal sites.

#### Officers' response

The submitter notes qualified support for the management approach adopted for Giant gunnera but suggests that the requirement imposed on land occupiers to destroy all gunnera present on their land may have unintended consequences on the coastal cliffs of the region. The submitter seeks that these sites be excluded from the Plan and that Council and the Department of Conservation develop a joint management plan/strategy for the plants in these areas.

Officers note the submitter's concerns and suggest an alternative relief. As suggested by the submitter, the Council and Department of Conservation could investigate developing a joint management plan for the management of Giant gunnera along coastal cliffs. Where that plan identifies sites and localities where the control of the plant would be inappropriate there is an opportunity to grant an exemption to the rule under section 78 of the Act.

#### Recommendation

**Grant the relief sought in part by investigating the application of exemptions to the rule subject to an agreed management plan.**

---

## Decision sought

### Section 6.9: Sustained control species: Gorse

- (w) Seeks the removal of the Good Neighbour Rule for Gorse.

#### Officers' response

The submitter does not support the sustained control programme or Good Neighbour Rule for Gorse and submits that it be removed from the RPMP. The submitter notes that Gorse seeds are extremely long-lasting in the soil and it is not possible to distinguish if infestations on neighbouring properties are from pest spread or germination from the seed bank.

Officers disagree with the submitter's views and do not recommend granting the relief. Council's impact evaluation and cost benefit analysis, including assumptions, underpinning the proposed good

neighbour rule are documented in the Section 71 report. The submitter has not provided any additional information to demonstrate that the underpinning assumptions were wrong or incorrect.

Of note, in order to ensure costs are indeed reasonable, the Council on behalf of all regional councils commissioned *Landcare Research* to provide advice on the appropriate boundary distance to manage pest plant species, having regard to their biological characteristics and dispersal distances. The 10m buffer distance proposed for Gorse is consistent with that advice.

The submitter's comments relating to seedbank do not preclude the application of Good Neighbour Rules. Officers recognise that Gorse can act as a nursery for native plant species and there will be occasion when the control of Gorse would be undesirable for conservation reasons. Officers note that under such circumstances there is an opportunity to grant an exemption to the rule under section 78 of the Act. Of further note the proposed 10m buffer distance is a reduction from the current rule which involves a 25m buffer.

Good Neighbour Rules are intended to prevent a land occupier imposing unreasonable pest management costs on their neighbour where they are managing the relevant pest. The submitter questions the reasonableness of having Good Neighbour Rules for a number of production pests but does not challenge the reasonableness of having Good Neighbour Rules for environmental pests. It is important to note that the RPMP is a regional plan that should address a broad range of values of importance to this community, including economic.

## Recommendation

**Decline the relief sought.**

---

## Decision sought

### Section 6.11: Sustained control species: Old man's beard

- (x) Supports the inclusion of Old Man's beard in the RPMP.
- (y) Seeks the addition of biological control to the suite of listed "Service delivery" activities.

### Officers' response

The submitter's comment and support are noted. Officers agree to minor amendments to section 6.11.3 of the RPMP to include biological control programmes in the suite of measures for controlling Old man's beard.

## Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 6: Sustained control species: Pampas

- (z) Seeks amendment to the rules for Pampas in the RPMP whereby Good Neighbour rules apply only west of the pest management line and only require the occupier to prevent seeding.

### Officers' response

The submitter notes that Pampas seed is prolific and may be wind dispersed for 10-25km. Given this spread the submitter questions the reasonableness of a Good Neighbour Rule to control Pampas. The submitter proposes an alternative management programme whereby Good Neighbour rules apply only west of the pest management line and only require the occupier to prevent seeding.

The submitter's comments are noted. Officers note that other submitters (these being Submission numbers 2 and 3) have raised similar concerns and have sought that Pampas be deleted from the RPMP,

Officers agree that the prolific seeding of Pampas and seed dispersal distances is likely to impose significant compliance cost on land occupiers with Pampas on their land. Historically these compliance costs have principally fallen on farmers using Pampas for hedging and shelter belts. Of note farmers are not significantly affected by Pampas because their land is vegetated and Pampas does not grow well on vegetated or modified land. Pampas does not grow well in sub-alpine, or alpine areas either, so it has little impact on the Egmont National Park.

Officers recommend that Pampas is removed from sustained control management under the RPMP and instead be addressed under the Biosecurity Strategy through site-led programmes and activities including pathway management, advice and education, liaison and advocacy, and biological control. The Council would still monitor and control Pampas on Key Native Ecosystem sites.

## Recommendation

**Grant the relief sought by removing Pampas from sustained control management under the RPMP and including it as a "harmful organism" to be managed under the Biosecurity Strategy.**

---

## Decision sought

### Section 6.12: Sustained control species: Wild broom

(aa) Seeks the removal of the Good Neighbour Rule for Wild broom.

#### Officers' response

The submitter does not support the sustained control programme or Good Neighbour Rule for Wild broom and submits that it be removed from the RPMP. The submitter notes that Wild broom seeds are extremely long-lasting in the soil and it is not possible to distinguish if infestations on neighbouring properties are from pest spread or germination from the seed bank.

Officers disagree with the submitter's views and do not recommend granting the relief. Council's impact evaluation and cost benefit analysis, including assumptions, underpinning the proposed good neighbour rule are documented in the Section 71 report. The submitter has not provided any additional information to demonstrate that the underpinning assumptions were wrong or incorrect.

Of note, in order to ensure costs are indeed reasonable, the Council on behalf of all regional councils commissioned *Landcare Research* to provide advice on the appropriate boundary distance to manage pest plant species, having regard to their biological characteristics and dispersal distances. The 10m buffer distance proposed for Wild broom is consistent with that advice.

The submitter's comments relating to seedbank do not preclude the application of Good Neighbour Rules. Officers are aware that Wild broom can act as a nursery for native plant species and there will be occasion when the control of the plant might be undesirable for conservation reasons. Officers note that under such circumstances there is an opportunity to grant an exemption to the rule under section 78 of the Act. Of further note the proposed 10m buffer distance is a reduction from the current rule which involves the whole property.

Good Neighbour Rules are intended to prevent a land occupier imposing unreasonable pest management costs on their neighbour where they managing the relevant pest. The submitter questions the reasonableness of having Good Neighbour Rules for a number of production pests but does not challenge the reasonableness of having Good Neighbour Rules for environmental pests. It is important to note that the RPMP is a regional plan that should address a broad range of values of importance to this community, including economic.

## Recommendation

**Decline the relief sought.**

---

## Decision sought

### Section 6.13: Sustained control species: Wild ginger

(bb) Supports the sustained control objective for Wild ginger.

#### Officers' response

The submitter's comment and support are noted.

## Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6.14: Sustained control species: Yellow ragwort

(cc) Seeks the removal of the Good Neighbour Rule for Yellow ragwort.

#### Officers' response

It is the submitter's contention that the good neighbour rule for Yellow ragwort is inappropriate and inconsistent with legislation and the National Policy Direction. The submitter believes that a regulatory approach that meets the section 71(e) tests could only apply where it is "*to prevent spread onto land that has never had the species present.*" The submitter further believes recent advances in biological control for this plant has significantly reduced its "*pestiness*".

Officers disagree with the submitter's views and do not recommend granting the relief. Council's impact evaluation and cost benefit analysis, including assumptions, underpinning the proposed good neighbour rule are documented in the Section 71 report. The submitter has not provided any additional information to demonstrate that the underpinning assumptions were wrong or incorrect.

Of note, in order to ensure costs are indeed reasonable, the Council on behalf of all regional councils commissioned *Landcare Research* to provide advice on the appropriate boundary distance to manage pest plant species, having regard to their biological characteristics and dispersal distances. The 20m buffer distance proposed for Yellow Ragwort is consistent with that advice.

The submitter suggests that the “*pestiness*” of Yellow ragwort has significantly reduced in recent times. However, it is Officer’s contention that the reduction in the “*pestiness*” of the plant in Taranaki is more to do with a strong regulatory regime than biological control. Notwithstanding that the Council already undertakes biological control of Yellow ragwort and will continue to do so.

Good Neighbour Rules are intended to prevent a land occupier imposing unreasonable pest management costs on their neighbour where they managing the relevant pest. The submitter questions the reasonableness of having Good Neighbour Rules for a number of production pests but does not challenge the reasonableness of having Good Neighbour Rules for environmental pests. It is important to note that the RPMP is a regional plan that should address a broad range of values of importance to this community, including economic.

### Recommendation

**Decline the relief sought.**

---

## Decision sought

### Section 7.1: Other harmful organisms

(dd) Seeks the clarification of existing rules and regulations on ownership, dispersal, or sale of harmful organisms.

### Officers’ response

The submitter seeks the clarification of existing rules and regulations on ownership, dispersal, or sale of harmful organisms identified in section 7.1 of the RPMP and suggests a reconsideration of objectives for some species. The submitter further suggests the addition of “*cooperation*” as a measure to support achievement of the objectives.

Officers recommend granting the relief in part by minor amendments to the Strategy, which is the preferred policy instrument for dealing with such matters.

Officers note that in accordance with section 100G(4) of the Act, inconsequential amendments have been made and incorporated into the revised Proposed Plan to focus more clearly on only those species declared to be pests and for which a regulatory approach has been adopted. Accordingly material in the Table relating to other harmful organisms has been transferred and inserted into Appendix 2 of the Biosecurity Strategy. The Table now includes an indication of the Management response in relation to each organism.

### Recommendation

**Grant the relief sought in part through amendments to the Biosecurity Strategy.**

---

## Decision sought

### Section 7.2: Management of other harmful organisms - Goats

(ee) Supports the inclusion of goats in section 7.2 of the RPMP as harmful organisms.

### Officers’ response

The submitter notes that it is currently supporting a programme to eradicate goats from Egmont National Park and the eradication goal is likely to involve proactive removal of goats from land surrounding the park where those goats are wild animals and are jeopardising the achievement of eradication. The Department is aware of other submissions that goats should be categorised as pests in the RPMP and encourages such mechanisms to the extent that policies and rules in the RPMP can assist in achieving and sustaining a goat-free Egmont National Park through control of feral and non-farmed goats.

The submitter’s comments and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 7.2: Management of other harmful organisms – Feral cats

- (ff) Supports the management approach for feral cats in section 7.2 of the RPMP (principal measures), including direct control in KNEs.

### Officers' response

The submitter's support is noted. Officers note further changes have been made to the Biosecurity Strategy to enhance feral cat control.

### Recommendation

**No relief necessary.**

---



## Submission No. 7

### Taranaki Mounga Project Limited

C/- The Business Advisory Group  
Level 14, 34 Shortland Street  
AUCKLAND 1010

## Decision sought

### Section 6 and goats

- (a) Seeks amendments to the RPMP to:
- define goats as a pest in a 'halo' around the Mounga involving land west of the SH3/3A; and
  - include rules that control goats within the halo area.

### Officers' response

The submitter notes that Taranaki Mounga Project Limited is an ambitious conservation project seeking to transform the mountain, ranges and islands of Taranaki through a large-scale ecological restoration project.

The submitter notes that one of its initial objectives is to eradicate goats from Egmont National Park and make the Park the first national park in New Zealand to be ungulate free. Eradication activities are likely to commence in 2019 or early 2020. The submitter notes that one of the key risks to the feasibility of goat eradication is that goats might invade the Park from the surrounding ring plain. The risk includes not just feral goats but also semi-domesticated goats (often of feral origin) tethered on the roadside outside of the farm gates.

The submitter suggests that while the Wild Animal Control Act 1977 provides for the hunting and killing of feral goats, there is uncertainty around the legal status of these semi-domesticated and tethered goats which are often kept as pets. The submitter is therefore seeking amendments to the RPMP to establish a regulatory 'halo' area around the boundary of the park to exclude farmed or domesticated goats.

The submitter is currently assessing the feasibility of achieving its goat eradication objective and has submitted on the RPMP because it considers the BSA may be the appropriate legislative and management vehicle to provide ongoing assistance and support.

There are a range of issues being raised by the submitter and a range of interventions relevant to goat management. Officers have been in pre-hearing discussions with the submitter to canvas the regulatory and non-regulatory options for excluding farmed or domesticated goats in support of their goat eradication objectives. Non-regulatory options exist. With respect to regulatory options there are a number of options

involving different players to address the risks. They include not only the Biosecurity Act but also potentially the Resource Management Act 1991, the Wild Animal Control Act 1977, and the Local Government Act 2002. For example all three District Councils have bylaws that restrict goats in halo or buffer zones of different sizes around the Mounga.

In the Officers' initial opinion it is highly unlikely that the BSA is the appropriate mechanism for managing the control of farmed or tethered goats owned by private individuals and treated as pets. Officers suggest further discussions and investigations are required, which precludes making immediate changes to the RPMP at this time. Notwithstanding that, Officers recommend amendment to the Strategy to include a new section that identifies a suite of Council activities and programmes in support of the Taranaki Mounga Project. This includes Council support of, and assistance to, the submitter's development of a goat eradication programme which may include Council undertaking joint advocacy and communication activities with the submitter to inform key stakeholders and agencies of the goal and methods.

If at a later date the requirement for rules in respect of goats on the ring plain has been sufficiently demonstrated, it is recommended that the matter be brought back to the Council for its consideration. Of note, recent changes to the BSA provide for partial reviews of a RPMP, and such a review should be a relatively simple exercise.

### Recommendation

**Decline the relief sought in relation to the RPMP but note amendments to the Strategy to include a new section identifying Council programmes and activities in support of the Taranaki Mounga Project.**

---

## Decision sought

### General:

- (b) Supports the Council's intention to support Community and Site-led biodiversity programmes in the RPMP.

### Officers' response

The submitter's support is noted.

### Recommendation

**No relief necessary.**

---



## Decision sought

### General: Vision

- (c) Supports Council's vision for biosecurity as set out in the Strategy.

### Officers' response

The submitter's support is noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Focus on surveillance and pathways

- (d) Supports the Council's pathway approach noting that this is likely to be more economically efficient to prevent the establishment of new pests.

### Officers' response

The submitter's comment is noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Increased focus on eradication of named pests

- (e) Supports eradication of four named species in RPMP.

### Officers' response

The submitter's support is noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Extension of Self-Help programme to rats and mustelids

- (f) Supports proposal for a self-help programme that targets a wider range of predators.

### Officers' response

The submitter notes support for Strategy proposal for a self-help programme that targets a wider range of predators. The submitter notes that the measure would reduce the number of predators that currently affect the biodiversity of the region and would provide positive social and ecological benefits to Taranaki.

The submitter's support is noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Support for Community and Site-Led Biodiversity Projects

- (g) Seeks amendment to the Strategy to identify the Taranaki Mounga Project as a key biodiversity programme that the Council supports.

### Officers' response

The submitter's comment is noted. Officers recommend amending the Strategy to include a new section setting out Council programmes and activities in support of the Taranaki Mounga Project. Of note this new section would include a Council commitment to work with the submitter to develop appropriate advisory and extension programmes in support of their objectives, including investigating regulatory and non regulatory options relating to the control and exclusion of goats in and around the Mounga (refer to previous comments in (a) above).

### Recommendation

**Grant the relief sought. See Section 7.2.6 in the Strategy.**

---

## Decision sought

### General:

- (h) Seeks amendment to the Strategy to include a specific programme of actions to support the implementation of the Taranaki Mounga Project.

### Officers' response

The submitter's comment is noted. Refer to comments in (g) above.

### Recommendation

**Grant the relief sought. See Section 7.2.6 in the Strategy.**

---

## Submission No. 8

### KiwiRail Holdings Limited (KiwiRail)

Pam Butler  
Senior RMA Advisor  
PO Box 593  
Wellington 6140

## Decision sought

### General:

- (a) Notes interest in developing workable and pragmatic approaches to pest management peculiar to its operational limits and circumstances.

### Officers' response

The submitter notes that it is keen to work with the Council and develop workable and pragmatic approaches to pest management peculiar to its operational limits and circumstances. This includes seeking an alternate management approach (such as a Specific Management Plan) as an agreed method of compliance with the RPMP.

The submitter's comments are noted and Officers refer to changes made in response to submissions on the whole plan development process and memoranda of understanding.

### Recommendation

**No relief necessary.**

---

## Decision sought

### General: Whole plan development process

- (b) Seeks alteration of the RPMP to include provisions which will allow the development of alternative management approaches, including Management Plans, as a method of compliance with the RPMP.

### Officers' response

The submitter's comments are noted. Officers recommend minor changes to the RPMP to recognise alternative management approaches (such as a Specific Management Plan), as an agreed method of compliance with the RPMP, and agree that the submitter and the Council will work together to target priorities and to adapt management activities to its unique operational limits and circumstances.

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 3.3.3: KiwiRail

- (c) Supports section 3.3.3 of the RPMP (formerly clause 3.3.2.3).

### Officers' response

The submitter notes support for section 3.3.3 of the RPMP (formerly clause 3.3.2.3). The submitter notes there are unusual practical challenges associated with managing pests along the rail corridor such as physical accessibility due to terrain, limited access points, difficulty identifying pest plants from the track, the need for specialist equipment and in planning and staging work between operational train activities.

The submitter's comments and support are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 5.4: Memoranda of Understanding

- (d) Supports section 5.4 of the RPMP provided it is altered to allow alternative management arrangements as well as memoranda of understanding.

### Officers' response

The submitter's comments are noted. Officers have altered the heading to read "Alternative Pest Management Arrangements" and amended the section to reflect the changed wording.

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Section 5.5: Rules

- (e) Supports the use of Good Neighbour Rules for all stakeholders and occupiers.

### Officers' response

The submitter supports the use of Good Neighbour Rules for all stakeholders and occupiers as a pragmatic approach to the management of pest plants. The submitter considers that pests should be controlled to a level that is acceptable between adjoining landowners but reasonable, and where certain criteria are met. The rules should provide for both 'neighbours' to actively manage pests.

The submitter's comments and support for Good Neighbour Rules are noted.

### Recommendation

**No relief necessary.**

---

## Decision sought

### Section 6: Pest Management framework for Gorse, thistles and Wild broom

- (f) Supports the use of biological control for Gorse, all forms of thistle, and seeks that biological control be applied for Wild broom.

### Officers' response

The submitter's comments and support are noted. Officers agree that biological control is available for Wild broom and reference to this has been added in the appropriate section of the RPMP (6.12.3).

### Recommendation

**Grant the relief sought.**

---

## Decision sought

### Part 3 (Procedures) – Powers conferred

- (g) Seeks alteration for section 8.3 of the RPMP (formerly 10.3) to provide for exemptions in relation to any agreed Management Plans.

### Officers' response

The submitter notes broad support for section 8.3 of the RPMP (formerly 10.3), however seeks alteration of the clause to provide for exemptions in relation to any agreed Management Plans, already referred to in respect of section 5.4.

The submitter's comments and support are noted. Officers agree to alter the clause in line with the changes already made to section 5.4.

### Recommendation

**Grant the relief sought.**

---

## Submission No. 9

Fish and Game New Zealand, Taranaki  
Region

PO Box 4152  
Whanganui 4541

### Decision sought

#### General:

- (a) Supports intention to combine rules for animal and plant pests into a single document, the list of species included, and the proposed Objectives, Principal Measures and Rules.

#### Officers' response

The submitter's comments and support are noted.

#### Recommendation

**No relief necessary.**

---

### Decision sought

#### Old man's beard: 6.10.3 and 7.2.4 in Strategy

- (b) Supports objectives and intention for Old man's beard as set out in section 6.10.3 of the RPMP and section 7.2.4 of the Strategy.

#### Officers' response

The submitter supports objectives and intention for Old man's beard as set out in section 6.10.3 of the RPMP and section 7.2.4 of the Strategy however notes inclusion of Kaupokonui Stream catchment reference in Strategy but not in RPMP. The submitter suggests this is an oversight and RPMP should be amended to align with Strategy.

Officers note that the RPMP is silent on Kaupokonui Stream because the initial control has already been completed in that area and there is therefore no need to refer to it in the rule.

#### Recommendation

**No relief necessary.**

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### Decision sought

#### Management regime for other harmful organisms

- (c) Support proposed management regime for other harmful organisms.

#### Officers' response

The submitter's support is noted.

#### Recommendation

**No relief necessary.**

---

### Decision sought

#### Management regime for other harmful organisms

- (d) Supports the management regime for other harmful organisms.

#### Officers' response

The submitter's support is noted. Officers note that the section on 'Other Harmful Organisms' initially included in the RPMP has been removed to keep the Plan solely regulatory, and transferred to the Strategy, as Appendix 2. The Strategy provides the detail sought by the submitter in terms of likely management approaches.

#### Recommendation

**No relief necessary.**

---

### Decision sought

#### General and other support

- (e) Supports Vision, Priorities and Outcomes of Strategy. Also supports expansion of predator control for mustelids, feral cats, and rats.

#### Officers' response

The submitter's support is noted.

#### Recommendation

**No relief necessary.**

---

## Decision sought

### Action 2: Section 7.2.2, and Action 5 - points 46-48

- (f) Supports Action 2 and proposed Action 5(a) (Community and site-led biodiversity programmes) and 5(b) (Other support and Assistance Services) of the Strategy.

### Officers' response

The submitter's support is noted.

### Recommendation

**No relief necessary.**

---

## Submission No. 10

Royal Forest & Bird Protection Society  
(North Taranaki Branch)

C/- Janet Hunt  
11 Tawa Street  
Inglewood 4330

### Decision sought

#### Section 6 – Pest Descriptions & Programmes

- (a) Seeks addition of Moth plant (*Araujia sericifera*) to list of eradication pest species as it has recently appeared in the New Plymouth urban area.

#### Officers' response

The submitter's comments are noted. Officers have undertaken an impact evaluation and cost benefit analysis in accordance with requirements set out in the Act and the National Policy Direction (refer Appendix I) and recommend that Moth plant be added to the list of eradication plants to be managed under the RPMP.

#### Recommendation

**Grant the relief sought and include Moth plant (*Araujia sericifera*) as an eradication pest.**

---

# Appendix I: Impact assessment and cost benefit analysis for Moth Plant

## Moth Plant (*Araujia sericifera* syn. *A. hortorum*)

### a. Pest attributes and distribution

#### Relevant biology

Attribute	Description
Form	Moth plant is a rampant evergreen, climbing vine growing up to 10m high with smelly, milky sap and twining flexible stems that are covered in down and woody near the base. Dark green leaves are hairless and dull on the top, greyish-downy underneath, and alternate on the stems. Clusters of 2-4 bell-shaped white flowers, occasionally with pink streaks, appear from December to May, followed by distinctive thick, leathery, pear-shaped choke-like pods containing kapok-like pulp, which splits open to disperse many black, thistle-down-like seeds
Habitat	Moth plant prefers loose, fertile soils, in warmer climates with moderate to high rainfall. Plants establish freely in semi-shade and grow up onto the canopy of shrubs and trees. Moth plant grows in a range of habitats, including forest margins, disturbed forest, hedges, wasteland, coastal sites and urban gardens. It can become a dominant species in urban environments.
Regional distribution	Limited distribution, confined to areas near the coast (18 known sites). Most sites located in urban areas.
Competitive ability	Rapid growth to canopy, forming large, heavy, long-lived masses. Tolerant of shade, very tolerant of drought or damp, wind, salt and many soil types. Poisonous and irritant-inducing. Germinates in light wells or semi-shade inside established forest, often long distance from seed source, and smothers and kills plants up into the canopy, preventing the establishment of native plant species.
Reproductive ability	Produces masses of viable seeds that can drift long distances on air currents.
Dispersal methods	Wind spreads seed from gardens, roadsides, orchards, hedges, plantations, vacant and industrial land.
Resistance to control	Poisonous, causes dermatitis, protect skill against contact with sap. Destroy ripe pods first to minimise seeding. Options for control include pull up seedlings (all year round), stump swab (best in summer-autumn), remove all pods and dispose of at refuse transfer state, burn or bury deeply, leave remains cut material on site to rot down, or spray (Summer-autumn).
Benefits	No benefits

#### Where is it a problem?

Land use type	Current land use infested*	Potential land use infested*	Pest significant problem on this land type**
Dairy	-	-	False
Sheep and beef (intensive)	-	-	False
Hill country (sheep)	-	-	False
Forestry	-	Low	False
Horticulture	-	-	False
Native / conservation	Low	High	True
Urban / Non productive	High	High	True

\* High = Most infested/preferred land use(s), Low = Less infested/preferred land use(s), - = Unsuitable land use. Source: Wildlands 2017

\*\* True = Most 'at risk' or impacted land use(s), False = Less 'at risk' or impacted land use(s) based upon impact assessment overleaf.



## b. Impact evaluation

### How is it a problem?

Category	Current	Potential	Comment	Source
<b>Production</b>				
Dairy	-	L	Negligible at a regional level although property impacts on farm riparian margins is possible	
Sheep and beef	-	-		
Forestry	-	M	Smother trees in plantation forests.	
Horticulture	-	-		
Other	-	-		
International trade	-	-		
<b>Environment</b>				
Soil resources	-	-		
Water quality	-	-		
Species diversity	M	H	Stems strangle host, overtop most canopies and cause collapse. Heavy infestations can alter successional patterns and prevent native regeneration, thus modifying the structure of the ecosystem.	
Threatened species	L	H	Could invade open habitats occupied by threatened species and spread into nesting areas of sand dune fauna	
<b>Social/Cultural</b>				
Human health	-	-		
Recreation	-	L	Layering stems can become very dense and obstruct access	
Maori culture	-	-		

L – 'low' impact (1–4% reduction in the economic value per ha per annum); M – 'moderate' impact (5–9% reduction in the economic value per ha per annum; H – 'high' impact (10–50% reduction in the economic value per ha per annum)

### How much does it cost?

For the purposes of this report, the monetarised impacts of Moth Plant are calculated as the current or anticipated proportional impact on environmental (native / conservation), production and social and cultural values across the region. However, this is a conservative estimate. The potential impacts are likely to be much higher with significant additional non-monetised costs being incurred where habitat degradation impacts on nationally threatened or regionally distinctive native species (and given the 'value' of these species).

Land use type	Current impact per ha	Potential impact per ha
<b>Production</b>		
Dairy	\$0	\$0.45 – \$1.96
Sheep and beef	\$0	\$0
Forestry	\$0	\$0.45 – \$1.96
Horticulture	\$0	\$0
<b>Native / conservation</b>	<b>\$4.43 – \$7.81</b>	<b>\$46.95 – \$284.20</b>
<b>Social/Cultural</b>	<b>\$0.07 – \$0.29</b>	<b>\$0.16 – \$1.67</b>

## c. Cost-benefit analysis

### CBA assumptions and inputs

Pest assumptions	Values	Programme assumptions	Values
Current area infested:	0.5 ha	Proposed Programme:	<b>Eradication</b>
Maximum potential area infested: <sup>o</sup>	45,760 ha	Proposed annual expenditure by Council:	\$15,000
Time to reach maximum extent: <sup>†</sup>	75 years	Repeated inspections and works required:	Annually
Current impacts (\$):*	\$6.30 / ha (\$4.50 – \$8.09 / ha)	Discount rate:	4%

<sup>o</sup> The potential extent the pest is predicted to achieve in the absence of regional management based upon LCDB

<sup>†</sup> The time a pest is predicted to take between first going wild in the region and reaching 90% of its potential maximum extent (in the absence of regional intervention)

\* Current impact is for the current area of the pest, averaged across the impacts on all land uses within this area.

### CBA assessment

The Council has calculated a cost-benefit scenario over 50 years for Moth plant.

The CBA shows that regional intervention in the form of an eradication programme is cost beneficial through the avoidance of pest impacts that would otherwise occur for forestry and conservation land uses/values as Moth plant spreads across its full potential extent. Potential habitat includes coastline/cliffs, scrublands, and inshore and offshore islands, forest margins, disturbed forest, hedges, wasteland, coastal sites and urban gardens. The net monetarised benefit of regional intervention over 50 years is estimated to be **\$10,823,041**. However, this does not take into account the non-monetarised 'value' of protecting biodiversity values, including some nationally threatened or regionally distinctive native species in Taranaki that would otherwise be impacted upon by this plant.

Scenario	Pest impacts*	Benefits	Council costs <sup>o</sup>	Compliance costs <sup>†</sup>	Net benefit
No regional intervention	\$10,954,230 min: \$1,873,933 max: \$56,193,115	\$0	\$0	\$0	
Eradication (preferred option)	\$45 min: -\$34 max: -\$61	\$10,954,185 min: \$1,873,967 max: \$56,193,176	\$131,144	\$0	<b>\$10,823,041</b> min: \$1,742,823 max: \$56,062,032

\* Includes economic costs and conservatively valued environmental, social and cultural costs

<sup>o</sup> Council costs refer to the administration and implementation costs incurred by the Council through the programme

<sup>†</sup> Compliance costs refer to any costs of control imposed on land occupiers through the programme

#### d. CBA statement and risks to success

If Moth plant were to become established it could seriously affect plantation forests, farm shelterbelts, riparian margins, and indigenous biodiversity. Eradication is technically feasible. The species has a very confined habitat range and occurs at very low densities in the region, and there is a high probability that infestation levels can be reduced to zero densities in the short to medium term.

The CBA for Moth plant suggests that the eradication programme will be net beneficial over the long term. There are public good benefits in preventing Moth plant from becoming established and avoiding the possibility of more significant costs for the region in the future.

#### Risks of the programme being unsuccessful in achieving objectives

Risk	Level of risk	Explanation
Technical risk	Low to Medium	Increased focus is required on surveillance and public awareness to identify sites of interest. There is a risk of previously unknown infestation sites being discovered over the life of the Plan and that the distribution and abundance of the species precludes eradication.
Operational risk	Low	The eradication of known Moth plant is technically feasible and cost-effective over a 50-year timeframe. Public intervention (whereby land occupiers do not incur the cost of control) should encourage the public reporting of infestation and the application of control techniques that will result in the effective control of the species.
Legal risk	Low	
Socio-political risk	Low	To be tested through the remainder of the Plan review process.
Other risks	Low	

#### e. Who should pay?

##### Beneficiaries and exacerbators

Group	Beneficiary	Exacerbator	Change behaviour	Assess costs & benefits	Control cost effectively
Forestry sector	Minor	Minor	No	Yes	Yes
Anyone intentionally dumping or incorrectly disposing the plant		Major	Yes	No	No
Regional community†	Major		No	Yes	Yes

##### Who should pay for the proposed management approach?

Moth Plant is a major threat to conservation values. Given the benefits of an eradication objective and the protection of indigenous biodiversity values are a public good rather than a private good, it is appropriate that the costs are paid for directly by the Council on behalf of the regional community. The regional community is able to assess the cost and benefits and effectiveness of the programme through the annual planning and reporting processes under the Local Government Act 2002 and through the review of future pest management plans.