

# Taranaki Regional Council

## SUMMARY OF SUBMISSIONS

### Proposed Regional Pest Management Plan for Taranaki

and

### Taranaki Regional Council Biosecurity Strategy

The *Proposed Regional Pest Management Plan for Taranaki* (the Plan) and draft *Taranaki Regional Council Biosecurity Strategy 2017–2037* (the Strategy) was publicly notified for submissions on 20 May 2017. As a non-statutory document, the Council was not required to consult on the Strategy. However Members agreed that it would be useful for the public to be given an opportunity to have input into the development of a Strategy that covers the full range of biosecurity work undertaken by Council.

The following is a summary of the submissions received and decisions requested by the submitters.

A total of 10 submissions were received. This document, which summarises the decisions requested in the submissions, has two parts:

- **Part One** **Submitter format:** the submissions are presented in the order that the Taranaki Regional Council received them. An index gives the submission number (1 – 10), the name of the person or organisation who made the submission and the relevant page number(s) of this document where the summary of decisions requested in the decision can be found.
- **Part Two** **Plan / Strategy format:** the submissions are presented in the order of the part of the Plan /or Strategy to which they relate. An index gives the section of the document to which each submission relates and the relevant page number(s) of this document where the summary of decisions requested in the decision can be found.

For ease of use, there are separate sections for each document



**PART ONE**

**SUBMITTER FORMAT**



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Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
1	Murray Hancock	P	Section 4 – Organisms declared as pests	Include Sycamore tree as a pest plant.
		P	Section 6.10 – Old man's beard	Control Old man's beard promptly in urban as well as rural areas.
		S	Question: Increased focus on eradicating certain named pests	Supported. Agrees with focus and notes an involved and better informed public could help with eradication.
		S	Question: Rules requiring land occupiers to maintain low predator numbers.	Supports extension of Self-Help Programme to rats and mustelids and more involvement of urban as well as rural land occupiers.
2	Waikato Regional Council	P & S	General comments:	Overall, WRC supports the approach and intent of both Plan & Strategy.
				WRC supports the division of current and future biosecurity policy matters into 10-year duration regulatory and 20-year non-regulatory documents. TRC's streamlined approach "has set the benchmark for clear-cut and concise splits of the various biosecurity policies and matters in both documents."
		P		WRC 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.
		P	Alignment between RPMPs: Two issues relating to Pampas and to changes in good neighbour rule boundary clearance distances.	See later comment re Pampas. Boundary clearance distance issues are a historical legacy that WRC will work through in impending review.
		P	3.1 – The Management Agency	Supported in part. Suggests amending section by adding reference to section 5.3 (Principal Measures to Manage Pests).
		P	4 – 'Organisms declared as Pests' and 'Rules'.	Supported in part. Suggests: <ol style="list-style-type: none"> <li>1. Expand text box in Section 4 by adding third bullet point referring to the application of Exemptions under section 78 of the Act.</li> <li>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."</li> </ol>
		P	4.1 – Other Harmful Organisms	Supports Council's management approach to Yellow bristle grass.
		P	5.3.3 – Service delivery	Supported in part. Suggests a clearer link could be made between Plan & Strategy. Suggests adding a sentence to make that link.
		P	6.1 – Climbing Spindleberry	Supported.
		P	6.2 – Giant reed	Supported.
		P	6.3 – Madeira vine	Supports eradication objective despite difficulty.
		P	6.4 – Senegal tea	Supported.
		P	6.5.1 – Possums	Supported in part. Suggests more clarity needed in wording. Suggests amend text box to clarify wording and add linkage Predator Free 2050 Limited and Strategy.
		P	6.6.4 – Giant buttercup	Supported in part. Suggests alignment of wording of heading with other similar sub-sections.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		P	6.11.2(c) – Pampas	Suggests change management programme to site-led (protecting values in places) category in order to provide service delivery on Key Native Ecosystems. WRC does not support specified buffer distance and is looking to change the management programme for Pampas during their next review.
		P	6.11.4.1 – Pampas	Delete reference to bird spread from this rule.
		S	General comments: Linkage of RPMP and Biosecurity Strategy.	Supported. Biosecurity Strategy complements RPMP well.
		S	1.4 and 3.3 – Five key priority areas.	Supports five key priority areas, which are well aligned with WRC's philosophy on pest management.
		S	2.3.4 – Management of pest pathways.	Strongly supports both regulatory and non-regulatory approaches to enable better management of pest pathways.
		S	2.4.2 – Department of Conservation.	Amend typo in first line.
		S	3.1 – Vision for biosecurity in Taranaki	WRC strongly supports vision identified by Council.
		S	4 – Pathways and exclusion	Suggests benefits of including a specific Exclusion category of pests in the RPMP to cover, for instance, rooks and wallabies. Including them allows TRC officers to access powers under the Act to intervene on private land in case these pests are discovered in Taranaki. Risk may be low but a cautionary approach is suggested, which would also align better with other North Island councils.
		S	4.3 and 2.3.4 – Pathway and exclusion targets	Supports active surveillance for high risk pathways and requests 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.
		S	Question 10 – Community and site-led targets	Suggests cautionary approach to extending self-help predator control to rodents or mustelids in line with predator control of possums. Characteristics of rodents and mustelids make it difficult to enforce rules for these species. However WRC supports the concepts underpinning the Predator Free 2050 concept and hopes to work with TRC on mutually beneficial projects.
3	Federated Farmers	P & S	General comments: Combination of strategies into one Plan and addition of Strategy.	Supports combination and the addition of a non-regulatory Strategy document.
			Detailed cost benefit analysis	Supports the development of a detailed cost benefit analysis.
			Eradication targets	Supports rigorous nature of process to identify pests that should be eradicated.
			Good Neighbour Rules	Strongly supports good neighbour rules and application of them to Crown and private land.



Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
			Pampas grass.	Does not support a sustained control management programme for Pampas. Recommends that Pampas be removed from sustained control list and placed in Strategy, with those pests for which regulatory intervention is not considered appropriate. Notes that education of landowners on the best way to manage pampas will likely be all that is required going forward.
		S	Extension of Self-help possum programme	Supports TRC for their SHP programme and support the Council in their intention to extend the programme to urban areas and to seek co-funding for Wild for Taranaki and Taranaki Mouna projects to support extension of self-help programme to rats and mustelids.
		P	Old man's beard	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 TRC is recognised for in the farming community and thanks the Council for their proactive engagement on the issue.
		P & S	Yellow bristle grass	<p>Recognises that eradication is no longer feasible, however considers it is still possible to prevent its spread into large areas of the eastern hill country, where control is much more difficult. Protecting this area is a priority. Acknowledges work up till now but states that sprays are still being applied incorrectly and YBG continues to move rapidly along road corridors. Notes that this does not meet the Strategy objective of preventing spread in the Taranaki region.</p> <p>Two options are suggested: 1. Put Yellow bristle grass in Plan under Sustained Control category. Notes that this has financial implications for Council and farmers. OR 2. Keep Yellow bristle grass in the Strategy in a list of 'other harmful options' for which regulatory control is not appropriate.</p> <p>Current control measures are not working. Remains open to both options identified, but either one requires refocusing and intensification of effort as continuation of previous measures have been largely ineffective.</p>
		S	Strategy Vision, principles and priority areas	Supports focus of vision and the cooperative, integrated, scientific and social mandated approach. Supports principles and priority areas.
		S	2.4 – Wider biosecurity framework outside Council	Supports approach of not duplicating work of other agencies but to add value where appropriate.
		S	4.2.1 – Risk assessments and contingency planning	Agrees in principle with the Strategy's increase in focus on surveillance and pathways. 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.
		S	8 – Other leadership responses	Supports promotion of alignment of regional pest management.
		P	3.3.4 – Road reserves	Supports approach of making roading authorities responsible for formed roads and land occupiers responsible for any paper roads on their land.
4	Morgan Foundation	P	General comments	Commends Council on a comprehensive and detailed Plan.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		P	6 – Pest descriptions and programmes and Table 8/9 Appendix 2.	<p>Support inclusion of feral cats in the Plan as a site-led pest and agree that there are sensitive wildlife areas where it is essential for cats to be managed to achieve biodiversity outcomes.</p> <p>Seeks changes to Table defining 'feral cat'. Morgan Foundation 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.</p> <p>Also seeks mention of toxoplasmosis in the definition.</p> <p>Notes that there is no mention about the creation or support of cat colonies, or cat abandonment, in the Plan [or Strategy]. Notes that "there are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies."</p>
		S	General comments	<p>Supports expansion of self-help possum control programme to include other predators however feral cats are not included "despite the devastating effect they have on our native species and the disease risk they bring to primary production". Cats will undermine the biodiversity outcomes of any predator control work if they are not included.</p>
5	Predator Free New Zealand Trust	P	General comments	<p>Commends Council on a thorough and detailed Plan.</p>
		P	6 – Pest descriptions and programmes and Table 8/9 Appendix 2.	<p>As for Submission 4, this submitter 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. Suggests we need ecologically sensitive areas to be defined as such so that cats can be managed in and around those areas.</p> <p>Also seeks a clearer definition of feral cat to include one without a microchip or with a microchip that is caught more than once. Also wants mention of toxoplasmosis in the definition.</p>
				<p>Submitter would also like to see rules preventing the establishment or maintenance of cat colonies. Notes that other councils (Tasman and Greater Wellington) are proposing including cat colonies in their plans. Also seeks rules about abandoning unwanted cats.</p>

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		S	Expansion of self-help possum control to other predators.	Supported. But seeks targeting of feral cats at a landscape scale given their devastating effect on biodiversity. Notes that in HB area they are catching many more feral cats than mustelids. Would support extension of SHP to cats and encourages Council to explore options. Recognises that farmers are busy and may not have time to do the feral cat control work sought.  Suggests there may be options to charge an additional levy on rateable land and use the funds to pay contractors to maintain predator levels. Notes that other councils (Hawke's Bay and Northland regional councils) have done similar things.
		S	7.2.3 - Urban Projects	Seeks extension of the SHP project to other predators, specifically, rats, mustelids and feral cats in urban areas. Wants TRC to support urban communities to control a range of predators and to support that control in joint programmes.
		S	7.2.5 – Community and Site-led biodiversity programmes	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.  Seeks that where TRC 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."
		S	Riparian planting benefits	Notes that PCE report 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.
		S	Appendix 1: Summary of the means for achieving individual pest management objectives	Seeks inclusion of rats and hedgehogs in list.
		S	Strategy: General	Seeks an approach by TRC to Government to develop national cat management legislation. At a minimum this would include compulsory de-sexing, microchipping, limits on cat ownership, breeder registration, rules on cat abandonment and establishment and maintenance of cat colonies.
6	Department of Conservation	P	Section 1.2: Purpose – Plan Establishment	Seeks changed wording for purpose statement at identified section as it misrepresents the purpose of having a plan and the rationale described contradicts the proposed interventions with respect to plans for eradication or exclusion subjects.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		P	Section 2.1: Strategic background	Seeks enlarged description of 'strategic landscape' that the plan sits in: "Review paragraph and more clearly describe the regional economic, biodiversity and cultural planning instruments that provide the rationale for pest management."
		P	Section 2	Supported in part. Seeks identification of the wider Taranaki pest management "landscape" – ie contributions from other publicly-funded agencies, such as DOC, who will supply spatial data on its programs" if the submission is accepted.
		P	Section 2.2: Legislative Background – 'Part 5: 'Managing pests and harmful organisms' and 'Part 2: Functions, powers and duties in a leadership role'	Supported in part. Seeks expanded comments on "Unwanted Organisms" including powers and reference to NPPA: descriptions of how unwanted organism and noxious fish status can provide added layer of regional pest management strategy, the powers TRC staff can access, and a summary of occupier obligations in respect to these species.
		P	Section 2.2.4 – Wild Animal Control Act 1977 and Wildlife Act 1953	Seeks correction or clarification of text in 2.2.4b concerning ferrets.
		P	Section 2.3 – Relationship with other pest management plans	Seeks addition of reference to collaboration.
		P	Section 3.3.2 – Crown Agencies	Seeks correction of description of good neighbour rule to more accurately reflect the Act and the NPD and correction of syntax to record that a GNR is a response to unreasonable costs.
		P	Section 3.3.2.1 – Department of Conservation	Seeks review and amendment of second paragraph of this section to include description of restrictions on spreading or holding particular pest fish.  Also seeks review of decision to remove status and rules for Brown Bull-headed catfish and include as 'Exclusion' pest.  Seeks amendment of this section (3.3.2.1) or section 7 (other harmful organisms) to include an undertaking that Council will support management of pest fish species in conjunction with DOC to either exclude, eradicate, or contain them.
		P	Part Two: Pest Management: Section 4: Brown bull-headed catfish.	Seeks re-inclusion of Brown bull-headed catfish as a pest in the region.
			Darwin's barberry	Seeks re-inclusion of Darwin's barberry as an eradication pest in the region, at least to the west of the pest management line.
			Climbing asparagus	Seeks inclusion of Climbing asparagus as an eradication pest in that part of the region west of State Highway 3.
		P	Section 4 and 4.1 – Other harmful organisms	Supports site management or pathway approach for pests noted [table since removed] especially mention of feral cats, notwithstanding advocacy for inclusion of pest fish, Darwin's barberry and Climbing asparagus.
				Supported in part. Seeks consideration of expansion of Table 4 [since removed] to add additional information on management approach for each species and to identify existing restrictions.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		P	Section 5 – Pest management framework	Supported. Particular support for provisions under 5.3.4 and 5.4.
		P	Section 6.1 – Climbing spindleberry	Supported.
		P	Section 6.3 – Madeira (Mignonette) vine	Supported.
		P	Section 6.4 – Senegal tea	Supported.
		P	Section 6.5 – Possums	Supported in part. Seeks more certainty about boundary to which the plan applies.
		P	Section 6.6 – Giant buttercup	Seeks deletion of good neighbour rule for Giant buttercup as considered inappropriate.
		P	Section 6.7 – Giant gunnera	Supported in part. Seeks limitation of management plan and occupier obligations to land above the coastal cliff edge. Also seeks new principal measure of developing and implementing a joint management plan/strategy for Gunnera on the coastal cliffs in association with DOC.
		P	Section 6.8 – Gorse	Seeks to exclude Gorse from a sustained control management programme and /or removal of the associated good neighbour rule.
		P	Section 6.10 – Old man's beard	Supports management approach for Old man's beard. Suggests the addition of reference to biological control to suite of 'service delivery' activities.
		P	Section 6.11 – Pampas	Seeks the development of separate pest management plans for Pampas east and west of the pest management line. Suggests that CBA analysis does not apply to the hill country. Seeks that occupiers should be required to prevent Pampas from seeding in areas <b>west</b> of the pest management line.
				Seeks removal of the GNR rule for Pampas in areas <b>east</b> of the pest management line.
		P	Section 6.12 – Wild Broom	Seeks to exclude Wild broom from a sustained control management programme and/ or removal of the associated good neighbour rule.
		P	Section 6.13 – Wild ginger	Supports management approach for Wild ginger.
		P	Section 6.14 – Yellow ragwort	Seeks to exclude Yellow ragwort from a sustained control management programme and/ or removal of the associated good neighbour rule. Notes especially recent advances in biological control agents.
		P	Section 7.1 – Other harmful organisms	Seeks clarification of existing rules and regulations that may apply, especially legal restrictions on ownership, dispersal, or sale.
				Seeks reconsideration of objectives for some species: in particular seeks establishment of exclusion or eradication objective for some species eg Plague skink, Wallaby, and Gambusia.
				Seeks addition of a principal measure of cooperating with other agencies on matters of surveillance, exclusion and eradication, as a significant additional measure supporting achievement of the objectives.
		P	Section 7.2 – Management of other harmful organisms	Supports inclusion of goats as harmful organisms.
				Supports Council's approach to management of feral cats (principal measures) including direct control in KNEs.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
7	Taranaki Mounga Project Limited	P	Section 6	Seeks definition of goats as a pest in a halo around the mountain (mounga) sufficient to contain the area to the west of the SH3/3A.
		P	Section 6	Seeks inclusion of rules that allow goats to be controlled within the halo area to as near as zero as practically possible to reduce the risk of goat reinvasion to the Mounga.
		S	General comments	Supports the Council's intention to support Community and Site-led biodiversity programmes in its Regional Pest Management Strategy
		S	Vision	Supports Council's vision for biosecurity as set out in the Strategy.
		S	Focus on surveillance and pathways	Supports and notes that pathway approach is likely to be more economically efficient to prevent the establishment of new pests.
		S	Increased focus on eradication of named pests.	Supports eradication of four named species in RPMP.
		S	Extension of Self-Help programme to rats & mustelids	Supports proposal and notes that the measure would reduce the number of predators that currently affect the biodiversity of the region. Taranaki Mounga Project considers that a self-help programme that targets a wider range of predators would provide positive social and ecological benefits to Taranaki.
		S	Support for Community and Site-Led Biodiversity Projects	Requests that the Council amend its Strategy to identify the Taranaki Mounga Project as a key biodiversity programme that the Council supports.
		S		Requests that the Council amend its Strategy to include a specific programme of actions to support the implementation of the Taranaki Mounga Project.
8	KiwiRail Holdings Limited (KiwiRail)	P	General	Thanks the Council for opportunity to comment. Seeks development of 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.
		P	Whole Plan development process	Supported in part. Suggests alteration to the Plan to include provisions which allow the development of alternate management approaches, including management plans.
		P	3.3.2.3 – KiwiRail	Supports clause.
		P	5.4 – Memoranda of Understanding	Supported in part. Suggests alteration of the clause to include alternate management approaches such as management plans, as well as MOUs.
		P	5.5 – Rules	Supports good neighbour rules "for all occupiers to manage externalities".
		P	6.8 – Gorse, 6.9 – Nodding thistle and 6.12.4 – Wild broom	Supports the use of biological control methods for Gorse, and all types of thistle. Seeks the addition of reference to biological control for Wild broom.
		P	10.3 – Powers conferred.	Supported in part. Suggests the addition of reference to agreed Management Plans in the paragraph referring to the exemptions register.
9	Fish & Game New Zealand, Taranaki Region	P	General	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.

Submission No	Submitter	Plan or Strategy?	Section of Plan or Strategy to which submission relates	Decision sought / comment
		P & S	Old man's beard: 6.10.3 and 7.2.4 in Strategy	Supports objectives and intention. Notes inclusion of Kaupokonui Stream catchment reference in Strategy but not in Plan. Suggests oversight and amendment of Plan to align with Strategy.
		P	Management regime for other harmful organisms.	Supported.
		S	General and other support	Supports Vision, Priorities and Outcomes of Strategy. Also supports expansion of predator control for mustelids, <b>feral cats</b> , and rats.
		S	Action 2: Section 7.2.2, and Action 5 - points 46-48	Supports Action 2 and proposed Action 5(a) (Community and site-led biodiversity programmes) & 5(b) (Other support and Assistance Services).
10	Royal Forest & Bird Protection Society (North Taranaki branch)	P	6 – Pest Descriptions & Programmes	Seeks addition of Moth plant ( <i>Araujia sericifera</i> ) to list of pest species as it has recently appeared in the New Plymouth urban area.





**PART TWO**

**PLAN AND STRATEGY FORMAT**



The following abbreviations are used for the submitters on the Plan and Strategy whose submissions are described in this part of the document:

DOC	Department of Conservation
FF	Federated Farmers
FG	Fish & Game New Zealand, Taranaki Region
KR	KiwiRail Holdings Limited (KiwiRail)
MH	Murray Hancock
MF	Morgan Foundation
PFNZT	Predator Free New Zealand Trust
RFB	Royal Forest and Bird Protection Society (North Taranaki Branch)
TMPL	Taranaki Mouna Project Limited
WRC	Waikato Regional Council

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**PROPOSED REGIONAL PEST MANAGEMENT PLAN**

Section of Plan to which submission relates	Decision Sought	Page No
General comments	<p>Supports the approach and intent of both Plan and Strategy. WRC supports the division of current and future biosecurity policy matters into 10-year duration regulatory and 20-year non-regulatory documents. TRC's streamlined approach "has set the benchmark for clear-cut and concise splits of the various biosecurity policies and matters in both documents." WRC 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. (WRC)</p> <p>Alignment between RPMPs: Two issues relating to Pampas and to changes to good neighbour rule boundary clearance distances. See later comment re Pampas. Boundary clearance distance issues are a historical legacy that WRC will work through in impending review. (WRC)</p> <p>Combination of strategies into one Plan and addition of Strategy: Supports combination and the addition of a non-regulatory Strategy document.            Cost Benefit Analysis: Supports the development of a detailed cost benefit analysis.            Eradication targets: Supports rigorous nature of process to identify pests that should be eradicated.            Good Neighbour rules: Strongly supports good neighbour rules and application of them to Crown and private land. (FF)</p> <p>Commends Council on a comprehensive and detailed Plan (MF)</p> <p>Commends Council on a thorough and detailed Plan (PFNZT)</p> <p>Seeks development of 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. In respect of the whole Plan development process: Seeks alteration to the Plan to include provisions which allow the development of alternate management approaches, including management plans. (KR)</p>	NA
Section 1 - Purpose	Amend wording for purpose statement at identified section as it misrepresents the purpose of having a plan and the rationale described contradicts the proposed interventions with respect to plans for eradication or exclusion subjects. (DOC)	1
Section 2 – Strategic Background	Enlarge the description of 'strategic landscape' that the plan sits in: "Review paragraph and more clearly describe the regional economic, biodiversity and cultural planning instruments that provide the rationale for pest management." Identify the wider Taranaki pest management "landscape" – ie contributions from other publicly-funded agencies, such as DOC, who will supply spatial data on its programs" if the submission is accepted. (DOC)	2
Section 2 – Legislative Background: Part 5 and Part 2	Section 2.2: Supported in part: Expand comments on "Unwanted Organisms" including powers and reference to NPPA: descriptions of how unwanted organism and noxious fish status can provide added layer of regional pest management strategy, the powers TRC staff can access, and a summary of occupier obligations in respect to these species.(DOC)	4
Wild Animal Control Act 1977 and Wildlife Act 1953	Correct or clarify text in 2.2.4b concerning ferrets. (DOC)	4
Relationship with other pest management plans	Section 2.3: Add reference to collaboration.(DOC)	4
Section 3 – The Management Agency	Supported in part. Suggests amending section by adding reference to section 5.3 (Principal Measures to Manage Pests) (WRC)	6
Section 3 – Crown Agencies	Section 3.3.2 – Correct description of good neighbour rule so as to more accurately reflect the Act and the NPD. Correct syntax to record that a GNR is a response to unreasonable costs. (DOC)	6, 7

Section of Plan to which submission relates	Decision Sought	Page No
	<p>3.3.2.3 – KiwiRail: None needed. Supports. (KR)</p> <p>3.3.4 – Supports approach of making roading authorities responsible for formed roads and land occupiers responsible for any paper roads on their land. (FF)</p>	
Section 3 - Department of Conservation	Section 3.3.2.1 – Review and amend second paragraph of this section to include description of restrictions on spreading or holding particular pest fish. Review decision to remove status and rules for Brown Bull-headed catfish and include it as ‘Exclusion’ pest. Amend this section (3.3.2.1) or section 7 (other harmful organisms) to include an undertaking that Council will support management of pest fish species in conjunction with DOC to either exclude, eradicate, or contain them. (DOC)	7
Section 4	<p>Re-include Brown Bull-headed catfish as a pest in the region. (DOC)</p> <p>Re-include Darwin’s barberry as an eradication pest in the region, at least to the west of the pest management line. (DOC)</p> <p>Include Climbing asparagus as an eradication pest in that part of the region west of State Highway 3. (DOC)</p> <p>Include Sycamore tree as a pest plant. (MH)</p> <p>Supported in part. Suggests expand text box in Section 4 by adding third bullet point referring to the application of Exemptions under section 78 of the Act. (WRC). And 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.” (WRC)</p>	10, 25-45
Section 4.1 – Other harmful organisms	<p>Supports site management or pathway approach for pests noted [table since removed] especially mention of feral cats, notwithstanding advocacy for inclusion of pest fish, Darwin’s barberry and Climbing asparagus. (DOC)</p> <p>Supported in part. Consider expansion of Table 4 [since removed] to add additional information on management approach for each species and to identify existing restrictions. (DOC)</p> <p>Supports Council’s management approach to Yellow bristle grass. (WRC)</p>	11
Section 5 – Pest Management Framework	<p>Supported in part. Suggests clearer link could be made between the Plan and the Strategy in 5.3.3. Suggests adding sentence to make that link. (WRC)</p> <p>Supported. Particular support for provisions under 5.3.4 and 5.4. (DOC)</p> <p>5.4 – Memoranda of Understanding: Seeks alteration of the clause to include alternate management approaches such as management plans, as well as MOUs. (KR)</p> <p>5.5 – Rules: Supports good neighbour rules “for all occupiers to manage externalities”. (KR)</p>	12, 13
Section 6 – Pest descriptions and programmes	<p>Cats: Also refers to Table 8/9 Appendix 2. Support inclusion of feral cats in the Plan as a site-led pest and agree that there are sensitive wildlife areas where it is essential for cats to be managed to achieve biodiversity outcomes. Seeks changes to Table defining ‘feral cat’. Morgan Foundation 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. Also seeks mention of toxoplasmosis in the definition. Notes that there is no mention about the creation or support of cat colonies, or cat abandonment, in the Plan [or Strategy]. Notes that “there are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies.”(MF)</p> <p>Wants 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. Also seeks a clearer definition of feral cat to include one without a microchip or with a microchip that is caught more than once and wants mention of toxoplasmosis in the definition. Notes that there is no mention about the creation or support of cat colonies, or cat abandonment, in the Plan [or Strategy]. Notes that “there are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies.” (PFNZT)</p>	14

Section of Plan to which submission relates	Decision Sought	Page No
	Goats: Seeks definition of goats as a pest in a halo around the mountain (mounga) sufficient to contain the area to the west of the SH3/3A. Also wants rules that allow goats to be controlled within the halo area to as near as zero as practically possible to reduce the risk of goat reinvasion to the Mounga. (TMPL)	
Section 6 – Eradication pests	Supports inclusion of Climbing spindleberry, Madeira vine, and Senegal tea as eradication pests. (DOC)  Supports inclusion of Climbing spindleberry, Giant Reed, Madeira vine, and Senegal tea as eradication pests.(WRC)	16-23
Sustained control pests	Possums – Qualified support. Wants more certainty about boundary for self-help scheme. (DOC)  Possums: Supported in part. Suggests amend text box to clarify wording and add linkage to Predator Free 2050 Limited and Strategy (WRC).	25-27
	Giant buttercup – Wants removal of GNR as not appropriate. (DOC)  6.6.4 – Giant buttercup: Supported in part. Suggests align wording of heading with other similar sub-sections (WRC).	29
	Giant gunnera – qualified support. Wants limitation of management plan and occupier obligations to land above the coastal cliff edge. Also wants new principal measure of developing and implementing a joint management plan/strategy for gunnera on the coastal cliffs in association with DOC.(DOC)	30-31
	Gorse - Exclude from a sustained control management programme and /or remove the associated good neighbour rule. (DOC)  6.8 – Gorse: Supports the use of biological control methods (KR).	32-33
	6.9 – Nodding thistle: Supports the use of biological control methods (KR).	34-35
	Old man's beard - Supported. Suggests add reference to biological control to suite of 'service delivery' activities. (DOC)  Control Old man's beard promptly in urban as well as rural areas. (MH)	36-37
	Pampas - Develop separate pest management plans for Pampas east and west of the pest management line. CBA analysis does not apply to the hill country. Require occupiers to prevent Pampas from seeding in areas west of the pest management line. Remove the GNR rule for Pampas in areas east of the pest management line. (DOC)  6.11.2(c) and 6.11.4.1 – Pampas: Change management programme to site-led (protecting values in places) category in order to provide service delivery on Key Native Ecosystems. WRC does not support buffer distance and is looking to change the management programme for Pampas during their next review. Delete reference to bird spread from the rule.(WRC)  Pampas: Wants removal of Pampas from sustained control list and inclusion in Strategy. (FF)	38-39
	Wild broom - Exclude Wild broom from a sustained control management programme and/ or remove the associated good neighbour rule. (DOC)  6.12.4 – Wild broom: Supports the addition of reference to biological control for Wild broom. (KR)	40-41
	Wild ginger – Supports management approach for Wild ginger. (DOC)	42-43
	Yellow ragwort - Exclude Yellow ragwort from sustained control management programme and/ or remove the associated good neighbour rule. Notes especially recent advances in biological control agents. (DOC)	44-45

Section of Plan to which submission relates	Decision Sought	Page No
Section 7.1 – Other harmful organisms	<p>Yellow bristle grass: Recognises that eradication is no longer feasible, however considers it is still possible to prevent its spread into large areas of the eastern hill country, where control is much more difficult. Protecting this area is a priority. Acknowledges work up till now but states that sprays are still being applied incorrectly and YBG continues to move rapidly along road corridors. Notes that this does not meet the Strategy objective of preventing spread in the Taranaki region. Two options are suggested: 1. Put Yellow bristle grass in Plan under Sustained Control category. Notes that this has financial implications for Council and farmers. OR 2. Keep Yellow bristle grass in the Strategy in a list of 'other harmful options' for which regulatory control is not appropriate. Current control measures are not working. Remains open to both options identified, but either one requires refocusing and intensification of effort as continuation of previous measures have been largely ineffective.(FF)</p> <p>Clarify existing rules and regulations that may apply, especially legal restrictions on ownership, dispersal, or sale. Reconsider objectives for some species: in particular establishment of exclusion or eradication objective for eg Plague skink, Wallaby, and Gambusia. Add a principal measure of cooperating with other agencies on matters of surveillance, exclusion and eradication, as a significant additional measure supporting achievement of the objectives. (DOC)</p>	47-49
Section 7.2 – Management of Other harmful organisms	<p>Supports inclusion of goats as harmful organisms. (DOC)</p> <p>Supports Council's approach to management of feral cats (principal measures) including direct control in KNEs. (DOC)</p>	48-49
Section 10 – Powers conferred.	Seeks the addition of reference to agreed Management Plans in the paragraph referring to the exemptions register. (KR)	56



## DRAFT BIOSECURITY STRATEGY

Section of Strategy to which submission relates	Decision Sought	Page No
General comments	<p>Supports the approach and intent of both Plan and Strategy. (WRC)</p> <p>Combination of strategies into one Plan and addition of Strategy. Supports combination and the addition of a non-regulatory Strategy document. Strategy Vision, principles and priority areas supported. Remove Pampas from sustained control list in Plan and place in Strategy. (FF)</p> <p>Seeks an approach by TRC to Government to develop national cat management legislation. At a minimum this would include compulsory desexing, microchipping, limits on cat ownership, breeder registration, rules on cat abandonment and establishment and maintenance of cat colonies. (NZPFT)</p> <p>Supports Council's intention to support community and site-led biodiversity programmes in its Strategy. Requests that the Council amend its Strategy to identify the Taranaki Mounga Project as a key biodiversity programme that the Council supports and to include a specific programme of actions to support the implementation of the Taranaki Mounga Project. (TMPL)</p>	NA
Vision, principles and priority areas	<p>Supports Council's vision for biosecurity as set out. (TMPL)</p> <p>Supports focus of vision and the cooperative, integrated, scientific and social mandated approach. Supports principles and priority areas (FF).</p>	
Focus on surveillance and pathways	Supports and notes that pathways are likely to be more cost effective to prevent the establishment of a new pest. (TMPL).	
Increased focus on eradication of named pests	Supports eradication of four named species in RPMP. (TMPL)	
Question: Increased focus on eradicating certain named pests	Agrees with focus and notes an involved and better informed public could help with eradication. (MH)	NA
Question: Rules requiring land occupiers to maintain low predator numbers.	Supports extension of Self-Help Programme to rats and mustelids and more involvement of urban as well as rural land occupiers.	NA
1.4 and 3.3 – Five key priority areas	Supports five key priority areas. Well aligned with WRC's philosophy on pest management (WRC)	8, 20
2.3.4 – Management of pest pathways	Strongly supports both regulatory and non-regulatory approaches to enable better management of pest pathways. (WRC)	14
2.4 – Wider biosecurity framework outside Council	Supports approach of not duplicating work of other agencies but to add value where appropriate. (FF)	
2.4.2 – Department of Conservation	Amend typo in first line. (WRC)	16
3.1 – Vision for biosecurity in Taranaki	WRC strongly supports vision identified by Council (WRC)	19
4 – Pathways and exclusion	Suggests benefits of including a specific Exclusion category of pests in the RPMP to cover, for instance, rooks and wallabies. Including them allows TRC officers to access powers under the Act to intervene on private land in case these pests are discovered in Taranaki. Risk may be low but a cautionary approach is suggested, which would also align better with other North Island	21

Section of Strategy to which submission relates	Decision Sought	Page No
	councils. (WRC)	
4.2.1 – Risk assessments and contingency planning	Agrees in principle with the Strategy’s increase in focus on surveillance and pathways. 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. (FF)	22
4.3 and 2.3.4 – Pathway and exclusion targets	Supports active surveillance for high risk pathways and requests 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. (WRC)	14, 27
7.2.1 – Working with others (community and site-led initiatives)	<p>Extension of Self-help possum programme: Supports TRC in their intention to seek co-funding for Wild for Taranaki and Taranaki Mounga projects to support extension of self-help programme.(FF)</p> <p>Supports expansion of self-help possum control programme to include other predators however feral cats are not included “despite the devastating effect they have on our native species and the disease risk they bring to primary production”. Cats will undermine the biodiversity outcomes of any predator control work if they are not included (MF).</p> <p>Expansion of self-help possum control to other predators. Supported but wants targeting of feral cats at a landscape scale given their devastating effect on biodiversity. Notes that in HB area they are catching many more feral cats than mustelids. Would support extension of SHP to cats and encourages Council to explore options. Recognises that farmers are busy and may not have time to do the feral cat control work sought. Suggests there may be options to charge an additional levy on rateable land and use the funds to pay contractors to maintain predator levels. Notes that other councils (Hawke’s Bay and Northland regional councils) have done similar things. (NZPFT)</p> <p>Extension of Self-Help programme to rats &amp; mustelids: None needed. Supports proposal. (TMPL)</p>	37-38
7.2.3 - Urban Projects	Seeks extension of this project to other predators, specifically, rats, mustelids and feral cats. Wants TRC to support urban communities to control a range of predators and to support that control in joint programmes. (NZPFT)	41
7.2.5 – Community and Site-led biodiversity programmes	<p>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. Seeks that where TRC 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.” (NZPFT)</p> <p>Riparian planting benefits: Notes that PCE report 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. (NZPFT)</p>	43
8 – Other leadership responses	Supports promotion of alignment of regional pest management. (FF)	47-54
Question 10 – Community and site-led targets	Suggests cautionary approach to extending self-help predator control to rodents or mustelids in line with predator control of possums. Characteristics of rodents and mustelids make it difficult to enforce rules for these species. However WRC supports the concepts underpinning the Predator Free 2050 concept and hopes to work with TRC on mutually beneficial projects. (WRC)	46
Old man’s beard	Supports extension of self-help programme principles to Old man’s beard along Kaipokonui Stream and Waingongoro River.(FF)	42
Yellow bristle grass	Yellow bristle grass: Recognises that eradication is no longer feasible, however considers it is still possible to prevent its spread into large areas of the eastern hill country, where control is	53

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	<p>much more difficult. Protecting this area is a priority. Acknowledges work up till now but states that sprays are still being applied incorrectly and YBG continues to move rapidly along road corridors. Notes that this does not meet the Strategy objective of preventing spread in the Taranaki region. Two options are suggested: 1. Put Yellow bristle grass in Plan under Sustained Control category. Notes that this has financial implications for Council and farmers. OR 2. Keep Yellow bristle grass in the Strategy in a list of 'other harmful options' for which regulatory control is not appropriate. Current control measures are not working. Remains open to both options identified, but either one requires refocusing and intensification of effort as continuation of previous measures have been largely ineffective. (FF)</p>	
Appendix 1: Summary of the means for achieving individual pest management objectives	Seeks inclusion of rats and hedgehogs in list. (NZPFT)	63