

Gilbert Smith

I DO NOT wish to be heard in support of my submission;

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

6.3 6.4

Sub-part/Provision

4.1 4.7 4.9 4.11

**(2) My submission is that:**

I oppose

Reasons

Chilean Needle Grass should be moved to progressive containment programme. Biological control (rust) to be introduced asap. Cape weed (Arctotheca calendula), broom, wilding pine should be added to Sustained control programme. Boundary control for blackberry 6.4.7, nodding thistle 6.4.9, and variegated thistle 6.4.11 should be at least 500m - seeds blow or are carried by birds even further than this!! Briar rose will become a major problem with drier climate! Especially near cities; castor oil plant(Ricinus communis), moth plant, thorn apple(Datura stramonium) and hemlock should be eradicated. And the angel trumpet tree (Datura) and opium poppy should go too. Ministry of Health might help?

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Unless you take a firm stand, noxious weeds will continue to spread across our region and our country. CNG originated in a small area near Bay View. Man has been responsible for its spread over HB (stock/machinery) and to the N. South Island (in hay sold/donated to drought affected farmers.

Margaret Symons

I DO NOT wish to be heard in support of my submission;

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

Privet control

Sub-part/Provision

No risk to health

**(2) My submission is that:**

I oppose

Reasons

We cut out our Chinese Privet. Now we have no spring runny noses and sneezing. So I dispute the results of the quoted Auckland study. Yet, if we go opposite on the Springfield Rd Rotary pathway, the symptoms all start up again. The whole area is full of privet. I would like to see all the privets cut down in winter when they are very visible amongst the deciduous willows. Then the stump could be painted with poison. Every year there are more and more privets on Springfield Rd. They started from the huge ones on the hill side of Springfield between 363 and 446 Springfield.

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Winter cut down of privets and stumps painted with strong tree killer.

**Please attach any supporting information**



Tim Gilberston

I DO wish to be heard in support of my submission;

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

all

Sub-part/Provision

Freal cats

**(2) My submission is that:**

I oppose

Reasons

the failure to address the problem of feral cats

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

that HBRC make a serious attempt to control feral cats by adopting a similar approach to the problem of stray /wandering /wild dogs and refer to my previous submission for details



Kylie Howard

I DO wish to be heard in support of my submission;

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

1

Sub-part/Provision

1

**(2) My submission is that:**

I oppose

Reasons

I want some thought into planning of drops of 1080. Not before school hoildays when we and other families can tramp and hunt on doc land. And also not dropped when hines have fawns. This is a cruel death.

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Some regulation into timing of drop.

Marie Taylor

I DO NOT wish to be heard in support of my submission;

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

6.4.3 page 57-58

Sub-part/Provision

Rabbits

**(2) My submission is that:**

I oppose

Reasons

The HBRC proposes no change to current resourcing levels surrounding rabbit control. Yet if the HBRC is to support the Hawke's Bay Biodiversity Strategy, it needs to actively encourage and demonstrate best practice rabbit control in high ecological value areas. One example is any sand dune habitat where rabbit numbers are currently decimating natural vegetation. While the HBRC is encouraging a great deal of urban and peri-urban planting, all this is compromised without appropriate rabbit control. The HBRC should be showing some leadership in this area. In the Regional Pest Management Plan discussion document it says on the "Managing Pests" page that the council actively manages rabbits, but this is patently untrue if no changes to resourcing are proposed.

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

For high ecological value areas and areas where the public are being encouraged to participate in plantings by the HBRC, then rabbits should be controlled by the HBRC, and best practice rabbit control demonstrated on a much wider scale. (I'm also adding hares in here too).

**(4) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

6.5.2 page 77

Sub-part/Provision

Feral deer

**(5) My submission is that:**

I oppose

Reasons

Currently the HBRC ranks deer control under the site-led status. I would like the HBRC to rank deer control much more highly, as they are a significant and increasing threat to virtually all high value ecological areas in Hawke's Bay. Deer remove the most palatable species first, and then continue

removing species by species. This means that very few deer can keep a lid on regenerating palatable species, and the forest is decimated of its diversity. The HBRC should be advocating strongly to landowners that greater control is necessary if we are not to lose more of naturally vegetated landscapes throughout Hawke's Bay. This needs significant resourcing, as virtually all existing reserves and covenanted areas throughout the Bay need top up deer fencing to exclude deer, and then high quality control to remove any remaining deer from inside of reserves. What is the point of adding more reserves to the network if we are not protecting the existing ones properly? There are virtually no fully functioning forest ecosystems in Hawke's Bay because of feral deer pressure.

**(6) I seek the following decisions from the Hawke's Bay Regional Council:**

Raise the emphasis on deer control to actively promote and encourage deer control; set aside significant provisions for top up fencing of covenants, council owned land and reserves.

**(7) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

6.5.3 page 78

Sub-part/Provision

Feral goats

**(8) My submission is that:**

I support

Reasons

I support creating binding goat management areas in the same way possum control has been rolled out. Why has it taken so long to roll out this successful idea through other pest species? As well as creating these management areas, I would like to see all legally protected reserves and covenanted areas fully fenced from goats. If the landowners in these areas cannot afford the fencing the HBRC should be contributing significantly to these areas. As well, there should a specialist contractor employed to continually repair the fences. If this doesn't occur, you may as well write off any positive conservation outcomes from Napier to Gisborne. I think the boundary control rule is admirable but it needs a wider scope such as helping with fencing. The HBRC should also encourage forestry companies to deer and goat fence high value ecological areas within production forestry blocks. Hunting alone will not be enough to protect these high value areas into the future.

**(9) I seek the following decisions from the Hawke's Bay Regional Council:**

Create binding goat management areas and support landowners in those areas more with fencing and fence repairs, particularly if they already have made the commitment to legally protect natural areas of vegetation by using covenants or reserves.

Rayonier Matariki Forests

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

Plan rule 10 page 62

**(2) My submission is that:**

I oppose

Reasons

Rayonier Matariki Forests (RMF) question why the residual trap catch (RTC) threshold has been reduced from 5% to 4%. As owner and manager of extensive areas of production forest in the region, which often borders DOC land we find it very difficult to maintain possum RTC densities at 5% particularly where these are not being effectively controlled by DOC or adjacent neighbours.

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Maintain residual trap catch level at 5%.

**(4) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

Plan Rule 15 page 81

**(5) My submission is that:**

I oppose

Reasons

Rayonier Matariki Forests (RMF) do not support the piecemeal approach for feral goats proposed by this rule. Feral goats are the number one pest problem for production forestry causing significant damage to our exotic plantings and indigenous ecological areas. Unified control across the region is required to be effective.

**(6) I seek the following decisions from the Hawke's Bay Regional Council:**

Council need to establish a rule that seeks to effectively control feral goats across the region. The 500m adjoining property boundary distance should be removed , with the requirement being to destroy all feral goats on a property where adjoining property ecological, recreational values or economv well-being require protection.

Ngāti Pahauwera Development Trust  
Bonny Hatami

I DO NOT wish to be heard in support of my submission

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

4.2 Page 24

**(2) My submission is that:**

I oppose

Reasons

Specifically regarding Hornwort which is an invasive aquatic pest - we believe that it should be included and regarded with higher regard to removal in 4.1 rather than in section 4.2

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

We oppose the inclusion of Hornwort in the section 4.2 that it may be controlled and would like to see it moved to the 'declared as pest' and intended to eradicate section above in 4.1

**Please attach any supporting information**

See attachment 1

**(4) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

2.5 page 18

**(5) My submission is that:**

I support

Reasons

While we support the final paragraph in this section. "The LGA requires Council to recognise and respect the Crown's responsibilities under the Tiriti o Waitangi - Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes supporting tangata whenua. These responsibilities and requirements were met while preparing this plan and will continue after it takes effect. This Plan is one of the avenues to build synergy and co-operation between Māori organisations and Hawke's Bay as partners in managing the Region's natural resources" we would like to hear how this will work practically. We re-attach the NPDT submission to the HBRC annual plan 2017.

**(6) I seek the following decisions from the Hawke's Bay Regional Council:**

Excluding JPC and Maori Committee consultation - how will HBRC support and cooperate with Tangata whenua and its Treaty Partners and how will we work as partners to manage the region's natural resources. We would like to see real partnership with HBRC on plant and pest control in the Ngati Pahauwera rohe where we can work together on removal of Hornwort from the Putere Lakes, blackberry in the pahauwera rohe, ground based possum control in forests and native bush, employment pathways for our members and opportunities for participation and education. We would like our members to be doing the mahi in our rohe.

**Please attach any supporting information**

See attachment 2

Chilean Needle Grass National Steering Group  
Warwick Lissaman

I DO wish to be heard in support of my submission

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

6.4, pages 54-56

Sub-part/Provision

6.4

**(2) My submission is that:**

I oppose

Reasons

HBRC PMP 2017 On behalf of the Chilean Needle Grass National Steering Committee, (CNGNSG), thank you for the opportunity to submit on your proposed plan. The CNGNSG wants to work alongside the Biosecurity team members in the raising awareness of the pest plant, supporting the standardization of policies and rules across all regional authorities with respect to the prevention of spread and the raising the debate for all New Zealand of the need to stop the spread and push back against the levels of infestation. Whilst the CNGNSG support the proposed plan changes, where they increase the level of response to CNG, however oppose the proposed changes where they decrease the level of response, further the CNGNSG endorse the Federated Farmers submission on this point. It is important that the following is considered by the commissioners and that arguably room for a higher status and a reclassification based on a re-working of the cost benefit analysis is considered. The opportunity to look at the data set used in this program proposal would be welcomed by the CNGNSG. The argument can be made for Eradiication (Total Control); however balancing the needs of land owners with the pest plant, means to be too draconian could result in driving the problem under ground; balancing the assessment is also important, as grouping it under sustained control risks it being seen only as a weed and a nuisance compliance problem; this risk is real and of significant concern; apathy should not be allowed to rule. Eradication would be problematic due to the lack of research of control options; my argument is that we need to have this plant pest under progressive containment programmes; for the life of this plan, enabling the door to be left open to elevating to Pests to be managed under eradication programmes 10-15 years out from now. How to elevate to progressive containment programme status; this is problematic due to the way that these programmes are determined. This is elaborated on further. It is noted that the plan allows for best management practice as opposed to a prescribed rule with the introduction of good neighbourly rule for feral goats but CNG does not warrant such a policy?; yet as attached, the Pathway management notes supplied to landowners when infestations are found contain liberal best practice advice; proving the case for introduction of best practice within regional authority policy as well as at operational level. HBRC is to be commended for acknowledging how the biosecurity team is working with groups of people, yet to date the biggest pastoral pest threat CNG,



does not have a group formed, but welcome the fact that when one has been established the HBRC will work with them. This is a 10 year plan, but you need to look further than 10 years to understand bio security risks. Critical mass of a pest species can establish slowly initially but will at some point result in exponential growth. Maybe I need to paint this picture for your future: Whole catchments, becoming all of Hawkes Bay infested; sheep systems non existent or highly modified and few and far between, no sheep processing industry, no wool industry no sheep livestock cartage of any scale. Sheep systems replaced by beef and deer systems, and forestry. Recreational use limited, conservation value negative complete loss of grassland biodiversity. Look around Melbourne in Victoria, we don't have vast areas of cheap land; interestingly the fact Chilean needle grass is a Weed of National Significance (WONS) and is considered to be one of the worst weeds in Australia because of its invasive nature, potential for spread, and economic and environmental impacts; and in the Hawkes Bay, is identified as a threat/cost to arable exports to Australia in your plan... the risk to NZ economy is 1000'sX more than arable exports to Australia from HB. Why do we need PMP to recognize CNG in the progressive control program status. We need to have hope, hope will come from awareness and education, the later will come from a recognition in the PMP that gives the pest threat status it deserves, rather than the gradual downgrading due to ignorance of the science, environmental impact, economic impact and public apathy. HBRC has a environmental strategy, and pest management strategy, and then a 10 year PMP, which contains rules, for a proposed program. The justification of those rules and that PMP are documented and include a cost benefits analysis of the proposed program as opposed to the cost and benefit to the wider NZ or Regional context of eradication(if the Pest plant is not in total control or eradication) The Cost Benefit assessment is for the proposed control program; this is based on historical knowledge of pest species and the likely success of the program, a range of values are obtained for the inputs and somehow an average is derived for the calculation, the formula has limited variables and differential weightings, and is designed to take out some of the political interference in programs of the past , whilst this is to be commended, the data set used is used to validate the program designed rather than to determine the program choice.; averages in reality do not exist and what happens is the effects are minimized rather than maximized; in addition the un-intended consequences are not recognized. MPI require this assessment, but it only calculates cost benefit of success of proposed plan, not of eradication of; history tells us these assessments are used for the wrong purpose and for this to be used for cost/benefit to NZ we have a problem. The CNGNSG wishes to be heard, and would like to present more evidence to support this submission. Warwick Lissaman Chairman CNGNSG 'Breach Oak' RD 1 SEDDON 027 457 5041

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Refer to submission.

**Please attach any supporting information**

See attachment 1

Cat foundation  
Richard Burton

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**(1) The specific provisions of the Proposal that my submission relates to are: Part and Page Number**

Cats

**(2) My submission is that:**

I oppose

Reasons

I totally disagree with Councils attempts to put cats without a microchip into a pest/ feral category! You will meet with huge opposition and unless you all want to be voted out if your positions I would change your attitude!

**(3) I seek the following decisions from the Hawke's Bay Regional Council:**

Change your attitude . Cats are the most loved companion animals all over the world. Do not try and change them into pests!

28 February 2018

Hawke's Bay Regional Council  
Proposal for the Hawke's Bay Regional Pest Management Plan  
Private Bag 6006  
Napier 4142

Email: [pestplan@hbrc.govt.nz](mailto:pestplan@hbrc.govt.nz)

Dear Council

**SUBMISSION ON PROPOSAL FOR THE  
HAWKE'S BAY REGIONAL PEST MANAGEMENT PLAN 2018-2038**

Thank you for the opportunity to provide feedback to the Proposed Hawke's Bay Regional Pest Management Plan Review. Please find below our submission.

The use of agrichemicals will be a significant tool used to meet the Objectives in this Proposed Plan. The misapplication of agrichemicals can have a negative impact on public health. The Regional Council's Resource Management Plan Rule 9 and 10 cover the discharge of agrichemicals into air or onto land arising from their use.

It is submitted that reference to these Rules should be made in Section 3.3.1 'Responsibilities of owners and/or occupiers of the Proposed Plan'.

If requested, we would be available to attend Council to speak to our feedback.

Yours sincerely



**Dr Nicholas Jones**  
Acting Clinical Director



Submission on Proposal for the Hawke's Bay Regional Pest Management Plan 2018-2038

FOR OFFICE USE ONLY

Submitter ID:

File No:

**Public information** - all information contained in this submission, including names and addresses for service, will become public information. Your information is held and administered by the Hawke's Bay Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.

**Return your signed submission by 5:00pm, Friday 16 March 2018:**

By Post:

Hawke's Bay Regional Council  
Proposal for the Hawke's Bay Regional Pest Management Plan  
Private Bag 6006  
Napier 4142

Or by email:

[pestplan@hbrc.govt.nz](mailto:pestplan@hbrc.govt.nz)

Full Name: <u>DAVID SEYMOUR BELCHER</u>	Phone (Hm): <u>877 2282</u>
Organisation* <u>NAPIER BRANCH OF ROYAL FORESTS &amp; BIRD</u>	Phone (Wk): _____
* the organisation that this submission is made on behalf of (where applicable)	
Postal Address: <u>"HOME BY", 22 FULFORD PLACE</u>	Phone (Cell): <u>021 145 8669</u>
<u>HAVELOCK NORTH</u>	Postcode: <u>4130</u>
Email: <u>dauidbelcher@xtra.co.nz</u>	Fax: _____
Signature: <u>A. S. Belcher</u>	Date: <u>8<sup>th</sup> MARCH, 2018</u>
<small>(Signature of person making submission or person authorised to sign on behalf of person making the submission – Please note a signature is <u>not</u> required if the submission is made by electronic means).</small>	

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my submission; and if so,
<input type="checkbox"/>	I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

HAWKE'S BAY REGIONAL COUNCIL.

SUBMISSION ON THE PROPOSAL FOR THE HAWKE'S BAY REGIONAL PEST MANAGEMENT PLAN,  
2018 TO 2038.

To the Principal Biosecurity Advisor  
Mr. Mark Mitchell  
Hawke's Bay Regional Council  
Private Bag 6006  
Napier. 4142.

Dear Mark,

I wish to write a submission on behalf of the Napier Branch of the Royal Forest & Bird Protection Society of NZ and myself as a Havelock North urban resident.

You are no doubt aware that I largely work as a conservation volunteer for Forest & Bird along with other reserves. As Chairman of the Napier Branch of F. & B., myself and other assistants maintain pest control in Little Bush Reserve, Puketitiri. I also maintain the pest control for the upper Karituwhenua Stream Reserve adjacent to our home property in Havelock North.

Part 1: Plan Establishment. Pg. 1.

1. Introduction.

1.1. Proposer.

On behalf of the Napier Branch of Forest & Bird along with myself, I wish to congratulate Council on the formulation of the Proposed Regional Pest Management Plan, 2018 to 2038.

1.2. Purpose.

The purpose of the proposals are good. With monitoring, these may require reviewal over the duration of the programme.

1.3. Coverage.

The operating success must cover all of the Hawke's Bay region administrative boundaries

1.4. Duration.

The duration is good but Council may need to review the programme with extension proposals especially if resources become diminished.

Part 2. Planning and statutory background. Pg. 8.

2.1.1. Council's biosecurity framework.

It remains of prime importance for Council to engage with all land owners/occupiers/guardians and the wider community to make this ongoing programme successful. Under the implementation of the Hawke's Bay Biodiversity Strategy programme it remains vitally important to halt biodiversity decline. With everybody working together, Hawke's Bay's biodiversity can be enhanced.

2.2. Legislative background and 2.2.1 Biosecurity Act, 1993.

The Biosecurity Act of 1993 with its functions, powers and duties in a leadership role will exclude, eradicate and or effectively manage pests under Regional Council leadership.

2.2.2 Resource Management Act 1991.

This act is also to promote and manage the Coastal Marine Area.

2.2.4. Wild Animal Control Act.

In full agreement.

2.2.6. Other Legislation.

In full agreement and enforce.

2.3. Relationship with other Pest Management Plans.

2.3.3. Predator Free 2050.

HAWKE'S BAY REGIONAL COUNCIL.

SUBMISSION ON THE PROPOSAL FOR THE HAWKE'S BAY REGIONAL PEST MANAGEMENT PLAN,  
2018 TO 2038.

Good, but we need to include a massive reduction with the rabbit population which is well out of hand.

2.5. Relationship with Maori.

Most important and supportive.

3. Responsibilities and Obligations. Pg. 18.

Supportive.

3.3.2.Crown Agencies.

Agree as they should be bound to responsibilities under the plan.

3.3.3 and 3.3.4.

Agree as they should be bound to responsibilities under the plan.

4. Organism Status. Pg. 21.

Agree with this section.

5. Pest Management Framework. Pg. 25.

Agree with this section.

6. Pest descriptions and programmes. Pg. 28.

6.2.9 Possums.

Continue with eradication programmes.

6.3.4.Darwin's Barberry.

We are pleased that you have included this pest within the programme.

\* 6.4.3. Rabbits.

More control required. Our Havelock North property would currently sit between 4 and 5 on the McLean Rabbit Infestation Scale. When is the new bait/poison available locally ?

6.4.4 Possums.

Continue the programme and monitor.

6.4.7 and 6.4.8 Blackberry and Gorse.

Continue the programme.

\* 6.4.11. Variegated Thistle.

Eradication required, especially in Council owned areas, eg, area of land adjacent to the TukiTuki River between Riverlands Park and the Black Bridge.

\* 6.5. Pests to be managed under site-led programmes.

All of this section. and add 6.5.8. to include Hedgehogs !

Suggest continuance with a monitored [where practical] culling /trapping programme.

7. Monitoring. Pg. 81.

Fully in support of this invaluable programme for the total Pest Management Plan to become a success.

8 Procedures. Pg.84.

Support and agree with this section.

9. Funding Analysis. Pg. 86.

Largely in support of this section.

I trust that this submission is in line of Council's request and I/we look forward to the implementation of this Management Plan.

David S. Belcher. [ Chairman of Napier Branch of Forest & Bird.] 8<sup>th</sup> March, 2018.

22 Fulford Place

Havelock North. 4130.

Hm Ph : 06 877 2283.

Cell : 021 145 8669.

E-mail : davidbelcher@xtra.co.nz

13 March 2018

*Address for Service:*

Organisation: Tangata Whenua Hawke's Bay  
Postal Address: c/- 15 Shakespeare Rd, Hill, Napier 4110  
Phone (Cell): 029 200 6532  
Phone (Wk): 06 834 3808  
Email: peter.a.eden@gmail.com

*By Post:*

Hawke's Bay Regional Council  
Proposal for the Hawke's Bay Regional Pest Management Plan  
Private Bag 6006  
Napier 4142

*By email:*

[pestplan@hbrc.govt.nz](mailto:pestplan@hbrc.govt.nz)

E aku rahi e aku iti

Please find within a collective response by multiple Mana Whenua Tangata Whenua Māori of Hawke's Bay / Te Matau a Māui.

The signatories to this submission **support** this Proposed Regional Pest Management Plan (RPMP) in principal, however have concerns around measures to be undertaken with respect to integration of

1. Māori aspirations / Worldview / Obligations to the Taiao
  - Recognising Intergenerational Māori Values
  - Ki Uta ki Tai / Mountains to Sea / Maunga to Moana
  - Integrating plans with Matauranga Māori
2. Methods of control to reach 4% residual trap catch (RTC) rate for possums aiming towards non-toxic application
3. Requirement to undertake control on 'unproductive' termed whenua
  - What are the full cost implications related to the 500m Good Neighbour Rule (GNR) on Whenua Māori & Ngā Whenua Rāhui covenants
  - COST analysis and definition of control on 'unproductive land' or Maori must be explored
4. Partnership Tangata Whenua
  - Our Maori engagement working with HBRC developing partnership in recognising and fulfilling the role, function and resourcing of Kaitiakitanga
  - Coordinated response realising Pest Management Strategy in practice by developing Maori partnerships and plans with central government organisations e.g Ospri, DoC MPI Ngā Whenua Rāhui, Ministry of Business, Innovation and Employment, Government Agencies
  - Technology compatibility, research and outcomes

**RMA preamble**

All persons exercising functions and powers under the Act are required to recognise and provide for seven matters of national importance set out in section 6. This includes section 6(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.

Section 7 of the Resource Management Act sets out 'other matters' which persons exercising functions and powers under the Act must 'have particular regard to'. This includes section 7(a) kaitiakitanga.

Section 8 requires that all persons exercising functions and powers under the Resource Management Act take into account the principles of the Treaty of Waitangi.

**Partnership**

'Particular regard to advice received from those iwi authorities on the draft document', 'local authorities must also provide iwi authorities with a copy of the relevant draft proposed policy statement or plan, allow iwi authorities adequate time and opportunity to consider the draft document and provide any advice' [Clause 4A of Schedule 1, RMA]. Section 32(4A) evaluation reports must summarise all advice reviewed from iwi authorities on the proposal, and how the proposal responds to that advice. Given the Hawke's Bay Regional Council (HBRC) has a regional leadership role under the Biosecurity Act 1993, it is somewhat alarming that tangata whenua have had to call for a regional hui for information, discussion and input into the Proposed Regional Pest Management Plan (PRMP) for the Hawke's Bay region for the next twenty years.



There are specific requirements for consultation with iwi authorities

These include considering ways in which the local authority may foster increased capacity of hapu/iwi authorities to respond to an invitation to consult, the establishment and maintenance of processes to provide opportunities for hapu/iwi authorities to consult, enabling hapu/iwi authorities to identify resource management issues of concern to them and indicating how those issues have been or are to be addressed. In order to assist with consultation, local authorities are required to maintain, for each iwi and hapu within its region or district, a record of the contact details for each hapu/iwi authority, the planning documents recognised by each hapu/iwi authority, and the area over which iwi or hapu exercise kaitiakitanga.

**Mana Whakahono a Rohe (Iwi/Hapu Participation Arrangements)**

A Mana Whakahono a Rohe must discuss: How hapu/iwi will participate in plan making processes, How required consultation with hapu/iwi will be undertaken, How council and hapu/iwi will work together to develop monitoring methodologies, How council and hapu/iwi will give effect to the requirements of any relevant hapu/iwi participation legislation (or agreements under such legislation), A process for managing conflicts of interest, A process for resolving disputes. Once a Mana Whakahono a Rohe has been finalised, councils must review their internal policies and processes to ensure they are consistent with the Mana Whakahono a Rohe.

### **Proposed RPMP**

Section 2.5 Relationship with Māori

We would like to see this resolved as suggested in the Proposed RPMP responsibilities and requirements being met in preparation of this plan, it is pleasing to note this Plan is synergistic towards co-operation between Māori organisations and HBRC as partners in managing the Region's natural resources.

Section 6.4

Review current statement how HBRC going to work with landowners covering costs of 500m GNR (A wider conversation around Section 9 RPMP). What is the impact of GNR on Whenua Māori & Ngā Whenua Rāhui covenants. How do we go about solving this?

PRODUCTIVITY in ecological terms, refers to the rate of generation of biomass in an ecosystem, usually expressed in units of mass per unit surface (or volume) per unit time, for instance grams per square metre per day ( $\text{g m}^{-2} \text{d}^{-1}$ ). For tangata whenua productivity as a concept in the Proposed RPMP requires much more interpretation. Fiscal costs borne by the interpretation of productivity do not fit the tangata whenua world view, and as such we are concerned about unjustified costs.

Section 7 Monitoring

Adding indicators to monitoring to make sure Māori aspirations are reached.

Section 8 Powers Conferred

S 33, RMA 1991 Transfer of powers. The RMA provides for local authorities to transfer their functions, powers or duties under the Act to public bodies, including hapu/iwi authorities.

Bibliography

We would like to see further reference to tangata whenua and HBRC as Treaty Partnership/s.

Glossary

More definition around Matauranga Māori, Tangata Whenua and other words in this submission that would assist with the overall understanding, protection and fulfilment of traditional obligations.

### **Matauranga Māori**

Due to the 20 year review period, integrating Matauranga Māori knowledge & tikanga into understanding & response to impacts ... climate change, global warming, extreme weather events that result in unknown biological effects based on changing terrestrial, atmospheric, aquatic and marine temperature and chemistry.

Freshwater pest fish

While not in the scope of this plan, we envisage future RPMP to integrate freshwater pest fishes as water chemistry and biophysical parameters continue to respond to global warming and climate change.

Along with working relationships with the Tangata Whenua of Hawke's Bay / Te Matau a Māui, we strongly recommend that HBRC uptake the expertise available through the Māori Biosecurity Network *Te Tira Whakamātaki* (<http://www.biologicalheritage.nz/programmes/maori-biosecurity-network>).

Free Prior Informed consent (FPIC), is to establish bottom up participation and consultation of an Indigenous Population prior to the beginning of a development on ancestral land or using resources within the Indigenous Population's territory (United Nations Declaration on the Rights of Indigenous Peoples, UNDRIP).

### **Towards a Predator Free 2050**

The "New Zealand Biodiversity Strategy 2000-2020" recognises and respects the role of Mātauranga Maori in biodiversity management while providing for its retention and protection. We support Predator Free Hawke's Bay / Te Matau a Māui with opportunities to work alongside HBRC to achieve Māori aspirations.

Hawke's Bay Tangata Whenua would like to work with HBRC towards non-toxic / zero toxicity regional pest management involving Practitioners / Contractors through to best practice technological expertise e.g. GIS.

### **Economic measures**

We can give effect to other Economic measures besides GDP, e.g. wellbeing indicators, Genuine Progress Indicator (GPI). Short, medium, longterm economic outcomes – e.g. meat, pelts from e.g goat, possum. As per the Prime Minister's instructions to Treasury to fiscal 2019 for measuring national progress on all three fronts - raising income while also improving environmental and social goods, we must work towards implementing wellbeing economics / wellbeing indicators.

We look forward to working in partnership with HBRC in its vision for Predator Free Hawke's Bay / Te Matau a Māui, mountains to sea ...

We wish to be heard in support of our submission.

Kei runga i te korowai atawhai o ngā taonga tuku iho

### **Tangata Whenua Hawke's Bay / Te Matau a Māui:**

HBRC Māori Standing Committee, HBRC Regional Planning Committee, Moteo Marae, Te Matai Trust, Te Taiwhenua o Te Whanganui a Ōrōtū, Ngāti Pāhauwera, Ngāti Kahungunu Executive, Ngāti Hinepare, Ngāti Mahu, Ngāi Taiwhao, Ngā Kaitiaki o te Awa a Ngaruroro, Kahungunu ki Te Mātau a Māui

### **Signature:**

(Signature of person making submission or person authorised to sign on behalf of person making the submission – Please note a signature is not required if the submission is made by electronic means).

## **East Coast Hawke's Bay Conservation Board Submission to the Proposed Hawkes Bay Regional Pest Management Plan**

Thank you for the opportunity for the East Coast Hawke's Bay Conservation Board to make this submission to the above proposed RPMP. We have some general statements below, with more specific comments on the following page.

- We congratulate the HBRC on front-footing regional pest management that we will endeavour to complement with our up-coming CMS.
- Support the goal of working with neighbouring Regional Pest Management Plans such as the recent Gisborne District Council.
- As the community representatives, this Board's submission is based on flora and fauna pests that directly affect the conservation estate.
- The RPMP acknowledges the vision for biosecurity management in Aotearoa / New Zealand through the release of Biosecurity 2025 and the focus on control of possums, rats and stoats.
- The RPMP continues to work with the Cape to City project established in May 2015 which offers significant advances in wide-scale suppression of predators within both private and public conservation lands.
- The Hawke's Bay Biodiversity Strategy, a community perspective with the aim of halting biodiversity decline and protecting native species and native habitats is reliant on the RPMP.
- The board supports the proposed change with inclusion of a marine pest management programme.
- Addition of wallabies as an exclusion pest. These are found in neighbouring regions.
- The inclusion of several 'good neighbour' rules for pests such as possums and feral goats.
- We also strongly support the emphasis on containment of the identified species and Sustained Control Programme.

We do not want to speak at the hearing but are available to answer any specific queries that relate to our submission.

Yours sincerely

Dr Lucy Meagher

[pestplan@hbrc.govt.nz](mailto:pestplan@hbrc.govt.nz)

Pest Management:

Wilding pine *Pinus radiata* an Organism of Interest page 29

*Pinus contorta* (lodgepole) pine\* *Pinus contorta* Progressive Containment page 49

Mediterranean fanworm\*\* *Sabella spallanzanii* Exclusion page 31

Clubbed tunicate *Styela clava* Exclusion page 31

Feral cat *Felis catus* Sustained Control Site-led page 62 and 77

Feral deer (incl. hybrids) *Cervus elaphus*, *C. nippon*, *C. dama* Site-led page 77

Rat (Norway and ship) *Rattus norvegicus*, *R. rattus* Site-led page 79

Possum *Trichosurus vulpecula* Eradication page 40 Sustained Control page 59

The marine pest management plan with all vessels entering Hawke's Bay waters to be clean of biofouling to prevent invasion of marine pests.

15 March 2018

Hawke's Bay Regional Council  
Private Bag 6006  
Napier 4142

**VIA EMAIL: [pestplan@hbrc.govt.nz](mailto:pestplan@hbrc.govt.nz)**

## **NAPIER PORT SUBMISSION ON THE PROPOSED REGIONAL PEST MANAGEMENT PLAN 2018-2038**

As a key stakeholder, Napier Port is in receipt of the Hawke's Bay Regional Council's Proposed Regional Pest Management Plan 2018-2038. We appreciate the opportunity to discuss the proposed Regional Plan with Mark Mitchell (Principal Biosecurity Advisor) on 26 February 2018, and to provide a written submission for your consideration.

Napier Port acknowledges the leadership role the Hawke's Bay Regional Council ('Regional Council') has under the Biosecurity Act 1993.

Alongside the Ministry of Primary Industries and Maritime New Zealand, Napier Port has a solid working relationship with the Regional Council on biosecurity and in particular on those matters impacting on the ports operations, its biosecurity responsibilities and the potential impacts it may have on port business and the marine environment it operates within.

As a Port organisation with border and biosecurity responsibilities, we operate under international law and therefore rely upon external agencies to maintain legal and regulatory controls for all vessels entering and leaving our international waters.

### **General Comment**

The submission by Napier Port focuses on the inclusion of the two marine pests and the objective and regulatory rule, among other methods, to programme exclude the marine pests – Mediterranean fanworm and clubbed tunicate.

The role of the Regional Council is 'post' border control and therefore we need to ensure any proposed rules in the Regional Pest Management Plan are appropriately regulated and resourced by the Regional Council and do not conflict or overlap with that rules and regulations governed by the Ministry of Primary Industries.

PART & PAGE NUMBER	SUB-PART / PROVISION	OPPOSE / SUPPORT	REASONS	FOLLOWING DECISION SOUGHT
Part Two Section 5 Page 26	5.3 Principal measures to manage pests,  Provision 4 Advocacy and Education	Support (in full)	Napier Port will be aiming to carry out, where appropriate the following; a) increase awareness of the two marine pests though internal education. b) Utilise when appropriate social media around public education around these two marine pests; and c) include identification of these two marine pests in our procedures 'on port operations' including underwater pile inspections, underwater hull inspections, navigation buoy removal and turbidly buoy removal for maintenance.	Maintain the current wording as it provides the Regional Council with a general purpose methodology to 'advocate and educate' people on pest management.
Part Two Section 6 Pages 31 to 33.	6.1 Pests to be managed under exclusion programmes	Support (in full)	Napier Port wish to ensure the two listed marines pest do not become 'resident' in the Hawke's Bay region, and therefore they fully support the proposed exclusion programme.	Accept in full the current wording.
Pages 31 and 32	6.1.8 Mediterranean fanworm and clubbed tunicate	Support (in full)	The exclusion programme of both marine pests is fully supported.	Accept in full the current wording of the description and adverse effects.
Page 32 and 33	Objective 1	Support (in full)	This objective provides for the exclusion of, among others, the establishment of Mediterranean fanworm and clubbed tunicate, and therefore Napier Port is supportive of the objective.	Napier Port is supportive of Objective 1.  Marine waterways which include the coastal marine area (CMA) will also be subject to the intent of Objective 1.
Page 33	Plan Rule 1	Support (in part)	Proposed Rule 1 <b>must</b> meet the requirements of the Ministry of Primary Industries (MPI) Craft Risk Management Standard (CRMS) for Biofouling.	It is <b>critical</b> that this rule meet the Ministry of Primary Industry standard, requirements and thresholds, as set out in the Craft Risk Management Standard (CRMS) for Biofouling, and be a 'common rule' across

				<p>the country for vessel operators. If the regional plan rule is inconsistent or more stringent than that of the MPI rule there is a risk of losing shipping calls to the detriment of Hawke’s Bay exporters.</p> <p>Ensure the intent of the proposed rule is no more stringent than the requirements of the Craft Risk Management Standard: Biofouling on Vessels Arriving in New Zealand (CRMS – Biofoul), 15 May 2014. This standard comes into effect on 15 May 2018.</p>
Page 33	Statutory obligation	Support (in part)	<p>A cross reference to the provisions of the Biosecurity Act 1993 provide for completeness purposes i.e. sections 52 and 53.</p> <p>It is therefore suggested that as noted in Section 4.1, Table 2, under section 45 of the Biosecurity Act 1993, the ‘discovery’ of the ‘Mediterranean fanworm’ is a notifiable organism. A sentence of that intent should also be added to this section, as this re-iterates the importance of the notification process.</p>	<p>Add the following sentence or similar.</p> <p><i>“The discovery of ‘Mediterranean fanworm’ is a notifiable organism under section 45 of the Biosecurity Act 1993, and must be complied with.”</i></p>

Napier Port does not wish to be heard in support of its submission.

Yours sincerely,

Todd Dawson  
Chief Executive Officer



16 March 2018

Hawke's Bay Regional Council  
159 Dalton Street,  
Napier  
4110

Dear Sir or Madam,

### COMMENTS ON THE HAWKES BAY REGIONAL PEST MANGEMENT PLAN 2018 - 2039

1. These comments are provided by Fisheries Inshore NZ Limited on behalf of the Area 2 Committee in respect of the Hawkes Bay Regional Pest Management Plan 2018 - 2039 released for consultation on 2 February 2018. These comments are specific to the Marine Pests identified in the document
2. Fisheries Inshore NZ Limited (FINZ) has a mandate from the Area 2 Committee to work directly with and on behalf of its quota owners for the management of fisheries within the region. The Area 2 Committee is a committee representing the interests of Area 2 quota owners and fishers. The focus is on stock-specific and regional issues that impact on the local fisheries they represent.
3. FINZ note that companies and other quota-holders may also make their own submissions on the proposals.

### Regional Pest Management Plan 2018 – 2039 – Marine Pests

4. We agree with the principle of stopping the spread of marine pests.
5. As such we support the inclusion of Marine Pests as part of the development of a 2018 – 2028 Regional Pest Management Plan. It is positive that the Mediterranean fanworm (*Sabella spallanzani*) and clubbed tunicate (*Styela clava*) are recognised as pests to be managed under an exclusion programme.
6. However, we would strongly assert that the success of achieving this will be dependent on how feasible it is to implement for stakeholder. Any implementation and monitoring of marine pests has to be cognisant of the realities of the maritime industry, and more specifically the NZ commercial fishing industry.
7. It is notable that marine pests are addressed on a regional scale as opposed to a more aligned national strategy. Raising concerns that regional discrepancies will impact the ability to effectively prevent the spread of marine pests. Marine pest management needs a national approach we need to determine an acceptable approach that acknowledges the complexity of implementing marine pathway management. A view supported by the current Waikato Regional Council Regional Pest Management Plan 2014-2024 which states "The council supports a national approach to examine how this responsibility would work in practice".
8. As per our submission on 7 July 2017 we would stress the importance of:
  - Developing collaborative relationships that can empower stakeholders and provide them with the skills to positively change behaviour.
  - Building on existing regional and national standards to ensure that any proposed eradication programme for marine pests is achievable in practice and reflects stakeholder views.
  - Marine pest management needs a national approach we need to determine an acceptable approach that acknowledges the complexity of implementing marine pathway management.

9. We strongly support the identification of advocacy and education as a principal measure to be used as part of the exclusion programme, we refer to our previous submission that raised the issue that any programmes developed by the Hawke's Bay Regional Council (HBRC) should complement the existing national education and awareness programmes to ensure a consistent message is provided.
10. The Management Plan and Cost Benefit Analysis (CBA) emphasises the need for an education programme and targeting engagement. As per our submission on 7 July 2017 we support this, however note that providing detail on the proposed advocacy and education process would enable stakeholders to remain informed of the HBRC approach.
11. A proactive (budgeted) education approach supported by non-regulatory methods such as voluntary registering incursions; and a public register that alerts of incursions will provide an effective way of achieving an education programme and targeting engagement.
12. We note that the CBA proposes that the general rate funds this exclusion programme.

#### Plan Rule 1

13. The plan rule associated with the exclusion programme for marine pests states:

#### Plan Rule 1

The operator of a vessel entering the waters of the Hawke's Bays Regional Council Area (Figure 6) must ensure the hull (includes hull area, niche areas and wind and water line) to be sufficiently cleaned and antifouled so that there is no more than a slime layer.

14. The current drafting of the plan rule does not provide the right balance between mitigating the spread of marine pests and the reality of the movement of vessels engaged in commercial fishing activities.
15. Any implementation and monitoring of marine pests has to be cognisant of the realities of the NZ commercial fishing industry and other maritime users. The plan rule as it is currently drafted is more onerous than the MPI Craft Risk Management Plan for vessels coming into NZ waters.
16. FINZ note that the current wording of the plan rule does not reflect section 73 6 of the Biosecurity Act 1993 (the Act) and would welcome discussion as to the drafting of the proposed rule with this in mind.
17. In line with clause c of section 73 6 of the Act, inserted below, we propose that in the first instance site led monitoring is limited to specified parts of the region, notably monitoring of the larger ports such as Napier and Ahuriri.  
*A rule may—*
  - (a) *apply generally or to different classes or descriptions of persons, places, goods, or other things:*
  - (b) *apply all the time or at 1 or more specified times of the year:*
  - (c) *apply throughout the region or in a specified part or parts of the region with, if necessary, another rule on the same subject matter applying to another specified part of the region:*
  - (d) *specify that a contravention of the rule creates an offence under section 154N(19).*
18. The draft rule text and associated supporting explanatory text in the proposed pest management plan does not adequately detail how this rule is proposed to work in practice as required by section 70 2(f) of the Act. There is not enough detail on the rule with regards to:
  - a. Its interpretation
  - b. How it will be enforced
  - c. how compliance will be achieved and who will determine / certify if a vessel is clean
  - d. what will happen if a vessel is found to be fouled

19. The proposed rule wording is not consistent with other regional council policies for managing marine pests contravening section 71A of the Act which states that in making a regional pest management plans the plan must not be inconsistent with:
- (i) the national policy direction; or*
  - (ii) any other pest management plan on the same organism; or*
  - (iii) any pathway management plan; or*
  - (iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991; or*
  - (v) any regulations; and*
20. In line with section 12B of the Act, we request a meeting with HBRC to facilitate communication and co-operation to enhance effectiveness, efficiency, and equity of the proposed marine pest eradication programme.
21. As outlined by the proposed pest management plan education is identified as a principle approach to achieving this plan. Taking this into account it is necessary that the HBRC work with vessel owners to ensure an appropriate rule is drafted.

#### Risk based framework

22. Whilst, the management plan sets out the statutory obligations and provides an explanation on the rule the information contained in the 2018-2039 Management Plan does not provide sufficient detail on the risk-based framework. The development and implementation of a risk-based management framework requires substantial collaboration with stakeholders to promote a transparent development process. Stakeholder engagement will also enable the HBRC to ensure the risk-based approach reflects the reality of maritime user operations.
23. We acknowledge that the use of risk-based management approach and a risk framework may enable effective timely management of marine pest risks posed by vessels entering Hawke's Bay waters. Further details of the scope and implementation of this risk-based framework is still required.
24. A matrix detailing the risk-based framework would assist in stakeholders providing feedback on this approach as part of the consultation process.

#### Monitoring

25. As stated in the 2018-2039 Management Plan "Both organisms are highly invasive and quickly form dense beds competing with native species for food and space." Supported by the cost benefit analysis document which specifies that *Styela* multiplies rapidly and can therefore establish itself very quickly.
26. The biological nature of these organisms and the voracity with which they can become established warrant monitoring. Based on the information in paragraph 25 we support the monitoring and reporting for *Sabella* and *Styela*.
27. Aligned with the monitoring proposal it is notable that that presence of *Styela* can be indicative of poor water quality. Given the high-risk areas associated with *Styela* anticipated to be Napier and Ahuriri ports it would be appropriate to ensure that water quality within these areas is monitored to inform the exclusion programme as declining water quality could promote the spread of *Styela* in the event that an individual is brought into the area.
28. We request the further rationale is provided to clarify:
- a. the site selection of the proposed high-risk areas identified for monitoring. As per our submission on 7 July 2017, it is rationale that marine pest surveys are conducted at both Ahuriri Harbour and Port of Napier, yet we note that MPI's targeted marine surveillance programme targeting high-risk ports does not include Napier.
  - b. Whether HBRC intend to utilise water quality monitoring as part of the exclusion programme as per the comments made in paragraph 12.

### Summary and position

29. FINZ has prepared this submission on behalf of the Area 2 Committee representing the interests of Area 2 quota owners and fishers.
30. In principal we support the development of an exclusion programme for Stylea and Sabella and note that the CBA identified that the benefits of regional intervention, outweigh the cost and exceed the benefit of an individual's intervention.
31. Whilst supportive of the principal of the exclusion programme we do not support the proposed rule as it is currently written and have reservations regarding how the rule is interpreted, implemented and enforced.
32. We request a meeting with HBRC to highlight our concerns with the proposed rule wording and provide an opportunity to get further information on this realities of implementing the proposed exclusion as highlighted in paragraphs 13 – 19.



Oliver Wilson  
Programmes Manager  
Fisheries Inshore New Zealand Ltd.



16 March 2018

Mark Mitchell  
Hawkes Bay Regional Council

Dear Mark

### **Submission on Proposed Hawke's Bay Regional Pest Management Plan**

Thank you for the opportunity to submit on the proposed Hawke's Bay Regional Pest Management Plan. Our submission is set out below.

#### **1. Consistency with the National Policy Direction**

We have not identified any inconsistencies with the National Policy Direction for Pest Management within the proposed plan or the associated Cost –Benefit and Cost Allocation analyses. However we would like to make a comment on the Good Neighbour Rule for possums (Plan rule 11).

Rules within a plan, must be clear enough that a land occupier can easily understand the obligations and whether the rule applies to them. We do not feel that plan rule 11 meets this expectation. We consider the rule needs to be edited for clarity.

#### ***Suggested wording***

“An occupier within, or adjacent to, a Possum Control Area, shall, on receipt of a written direction from an Authorised Person maintain possum densities on their land at or below 4% residual trap catch) within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also maintaining possum densities on their land at or below 4% residual trap catch, in order to protect economic well-being and environmental values. All possum control must be carried out in accordance with the Hawke's Bay Regional Possum Control Technical Protocol (PN 4969)

This rule does not apply where an occupier of land has entered into a Written Management Agreement approved by Hawke's Bay Regional Council.”

#### **2. Marine Biosecurity**

##### ***General Comment from MPI***

MPI has a leadership role for biosecurity and manages biosecurity risks offshore, at New Zealand's border and within New Zealand. This includes setting border standards for arriving vessels and goods, undertaking national high risk surveillance for high risk organisms, leading response to pest incursions, and providing leadership for pest management activities.

In our pest management leadership capacity, MPI is working with regional councils to build marine pest management capability and ensure regional pest or pathway management plan rules are consistent with, and give effect to the National Policy Direction for Pest Management and any other relevant national regulation. The New Zealand government has endorsed the “Anti-Fouling and In-Water Cleaning Guidelines – June 2013” (The Guidelines) developed jointly by Australia and New Zealand. The Guidelines aim to minimise both contamination and biosecurity risks associated with shore-based and in-water maintenance of vessels and moveable structures.

### ***Inclusion of marine pests***

#### 6.1 Pest to be managed under exclusion programmes

MPI is pleased to see that *Sabella spallanzanii* (Mediterranean fanworm) and *Styela clava* have been added to this pest management plan.

To enable the Council to take immediate action under this plan if required, MPI suggests that Council adds marine pests that are not currently in the Hawkes Bay region to the Exclusion Pests Programme. This would include *Eudistoma elongatum*, *Pyura doppelgangera*, *Charybdis* and *Undaria*.

#### Plan Rule 1 on page 34. Explanation, First sentence:

We suggest you add after the words “clubbed tunicate” “**and other unwanted organisms or pests**” as the two mentioned are not the only pests that it would be desirable to keep out of Hawkes Bay.

The Hawkes Bay discussion document refers only to vessels but perhaps the Council should include a condition about marine equipment so no new marine pests are bought into the region on aquaculture equipment. We suggest amending the wording to “a vessel, structure or navigation aid of any origin”.

Paras 2 and 3 under Explanation: The Council describes some of what a vessel owner needs to do to keep their vessel clean but it reads as if they can do this in the HBRC area, rather than before they enter. This may be what you intended, but if not, you might want to make it neutral on that and just explain what needs to be kept in mind when cleaning.

Para 2, 1<sup>st</sup> bullet: add the words: “has been applied in accordance with the coating manufacturer’s instructions” after the words “your antifouling paint”. It may also be useful to state that the cleaning method used must be in accordance with the coating manufacturer’s recommendations. In addition you may wish to reference the Anti-fouling and In-water Cleaning Guidelines (2013) which provide overarching guidance for in-water cleaning activities.

### **3. Wilding Conifers**

In relation to the management of wilding conifers we would like to make the following points regarding the inclusion of wilding conifer species with the plan.

#### **Page 51: Objective 5**

*Over the duration of the Plan, **progressively contain and reduce** the geographic distribution or extent of:*

*(i) ....., **pinus contorta**, ..... within the Hawke’s Bay region, and to prevent adverse effects on economic well-being and the environment of the Region.*

Consider including the following overarching objective taken from the NZ Wilding Control Management Strategy 2015 - 30 (the Strategy): "**To prevent the spread of wilding conifers, and to contain or eradicate established areas of wilding conifers by 2030**". Consider, also, MPI's submission on scope (below).

The National Wilding Control Management Programme has been developed to implement the Strategy. The Strategy and the Programme recognise there are numerous pest conifer species that are a risk to biodiversity and have adverse effects on economic wellbeing and the environment. The Plan and the Programme support progressive containment, and taking an integrated approach will advance shared aims and objectives.

#### **Page 49-50, Part 6.3.8 Pinus Contorta**

Support in part

MPI recommends extending the Plan's scope to include Wilding Conifers as defined below.

Recommended Wilding Conifer Definition:

**Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 1, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees.**

Table 1

<b>Common Name</b>	<b>Scientific Name</b>
Douglas fir	<i>Pseudotsuga menziesii</i>
Lodgepole or contorta pine	<i>Pinus contorta</i>
Scots pine	<i>Pinus sylvestris</i>
Dwarf mountain pine and mountain pine	<i>Pinus mugo and P.unicinata</i>
Bishops pine	<i>Pinus muricata</i>
Maritime pine	<i>Pinus pinaster</i>
Ponderosa pine	<i>Pinus ponderosa</i>
Corsican pine	<i>Pinus nigra</i>
European larch	<i>Larix decidua</i>
Radiata Pine	<i>Pinus radiata</i>

Wilding conifers are introduced conifers that have mainly established naturally as a result of natural seed spread. This process has been exacerbated by landowners failing to take action when wilding conifers first occur, and much of the ongoing wilding conifer spread in New Zealand is generated from existing areas of reproducing wilding conifers. Much of the initial wilding conifer spread originated from a range of sources, particularly historic or 'legacy' plantings, such as Crown plantings for erosion control and research; long-established shelterbelts and amenity plantings on private and pastoral lease land; and in some locations, from woodlots and forest plantations.

Wilding conifers are produced by many different introduced conifer species. Ten conifer species are recognised as currently contributing most to the wilding conifer problem in New Zealand. While some of these species now have little or no commercial value and are no longer planted, or much less frequently planted than in the past, several of these species, particularly Radiata pine (*Pinus*



radiata) and Douglas fir (*Pseudotsuga menziesii*), are highly valuable commercially grown species that contribute significantly to forestry exports.

MPI recommends extending the Plan's scope to include other conifer species. *Pinus contorta* is only one of a number of conifer species that are generally regarded to be a pest plant. In order to enable the regulatory control of at least some planted conifers where they pose a wilding conifer spread risk, and at the very least to prevent new plantings of these species, it is recommended that, in addition to specifying wilding conifers as pests using the definition set out above, the Plan also specify the following introduced conifer species as pests:

<b>Lodgepole or contorta pine</b>	<b><i>Pinus contorta</i></b>
<b>Scots pine</b>	<b><i>Pinus sylvestris</i></b>
<b>Dwarf mountain pine and mountain pine</b>	<b><i>Pinus mugo</i> and <i>P.unicinata</i></b>
<b>European larch (excluding sterile hybrids)</b>	<b><i>Larix decidua</i></b>

Some of the species that cause wilding conifers have very limited commercial value, but can be highly invasive, and therefore it may be appropriate to specify these species as pests in their planted state, in addition to being pests under the wilding conifer definition in their naturally regenerated state. This would effectively prevent new plantings of these species, as well as enable regulatory control requiring removal of these species in situations where they are planted but pose a wilding conifer spread risk.

Contorta in particular, is the most invasive introduced conifer species and represents a significant proportion of all wilding conifers and original sources of wilding conifer spread. Contorta is already an unwanted organism under the BSA, but is specified as a pest and subject to rules in only some current RPMPs.

Other low value but highly invasive conifer species that could also potentially be specified as pests are Scots pine, Dwarf mountain pine, Mountain pine, and European larch. In the case of European Larch, the intent here is to address early plantings that cause ongoing wilding spread, rather than the sterile hybrids that tend to be used in more recent plantings.

A key factor in recommending that these species be separately specified as pests is to enable control of them in their planted state where they are causing wilding conifer spread and/or threaten particular values through the spread of wilding conifers, as a means of supporting and contributing to wilding conifer outcomes. Consequently, these species would ideally be managed under the same RPMP programme as wilding conifers, but could potentially also be managed under a different programme in a different part of the region.

### **Page 43: part 6.3 Progressive Containment**

Support in part

MPI supports a modified Progressive Containment programme to include the species identified above

### **Page 52: Plan Rule 5**

*Except where an occupier of land has entered into a Written Management Agreement approved by Hawke's Bay Regional Council, an occupier of land shall:*

*(i) destroy all ....., **Pinus contorta**, ..... on their land;*

A breach of this rule is an offence under section 154N (19) of the Biosecurity Act 1993.

### Explanation

The reason for this rule is to prevent the spread of the plants to land that is currently free of infestations and to progressively increase the extent of clear land.

### Statutory obligation

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993. A breach of these rules creates an offence under section 154(O) of the Act.

### Support in part

MPI supports modified rules to include the species identified above. MPI also recommends modifying the rule to take into account where an occupier is participating in and or contributing to a Council managed or endorsed Wilding Conifer Management Plan, Strategy or Programme that specifies an approach for the progressive removal and / or management of the Wilding Conifers and other species identified in the Plan.

This advice takes into account recommended guidance prepared by MPI to assist regions in developing an integrated approach under the NZ Wilding Control Management Strategy 2015 - 30 and the National Wilding Control Management Programme.

**Page 27: part 5.4 The Plan does not expressly provide for GNR to apply to this pest.**

### Oppose

Recommend additional rule;

**“Occupiers shall destroy all wilding conifers on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers or other reasonable measures to control wilding conifers have been undertaken on the adjoining property, within 200m of the boundary, since the commencement of the Plan.”**

There is a need to ensure that public funds that have been invested in control programmes will be secured by enforceable future maintenance requirements.

Wilding conifers are produced by many different introduced conifer species. While some of these species now have little or no commercial value and are no longer planted, or much less frequently planted than in the past, several of these species, particularly Radiata pine (*Pinus radiata*) and Douglas fir (*Pseudotsuga menziesii*), are highly valuable commercially grown species that contribute significantly to forestry exports.

A regulatory back-stop is needed so that seed spread from commercially grown plantations can be managed, particularly in areas where publicly funded pest control programmes have been undertaken to the fullest extent possible. Also, any privately funded and voluntary control efforts should be similarly protected.

## 4. Other Pests

Pyp grass has been identified as an Unwanted Organism under the Biosecurity Act 1993. Pyp grass poses a significant threat to dune systems throughout New Zealand. In addition, Pyp grass was identified as a pest for eradication through the national priority pest programme exercise

completed in December 2006 and added to the National Interest Pest Response programme. This programme also includes Phragmites which is included in the proposed RPMP.

An eradication response for pyp grass in Hawke's Bay commenced at Blackhead in November 2000. The application of various herbicides has considerably reduced the plant's presence and eradication appears achievable. The last plant was found in 2011/2012. The monitoring and surveillance will end in 2020, assuming that no new plants are discovered. The Department of Conservation carries out regular surveillance and monitoring under contract with the Ministry for Primary Industries.

For consistency we recommend that pyp grass be added to the RPMP in the following ways;

## **6.2 Pests to be managed under eradication programmes**

**Add: Pyp Grass *Ehrharta villosa* to the pests under eradication programmes. Like Phragmites it is part of the NIPR programme and is also on the NPPA.**

## **Monitoring**

### **7.1 Measuring what the objectives are achieving**

**Add: Pyp Grass to the Eradication Programmes**

Thank you again for allowing us the opportunity to submit on the proposed Regional Pest Management Plan. We would like to speak to our submission.

If you would like to discuss our submission please contact Mike Harré on [mike.harre@mpi.govt.nz](mailto:mike.harre@mpi.govt.nz), or 04 894 0533.

Yours sincerely



John Sanson  
Manager, Recovery and Pest Management

**SUBMISSION ON THE PROPOSED REGIONAL PEST MANAGEMENT PLAN FOR THE HAWKES BAY REGION**

**TO:**

**SUBMISSION ON:** Proposed Regional Pest Management Plan

**NAME:** Director-General of Conservation

**ADDRESS:** Address for service:  
Department of Conservation  
56 Marine Parade  
(PO Box 644)  
Napier. 4140

Attention Connie Norgate

Telephone: 027 553 3956  
Email: cnorgate@doc.govt.nz

**SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION:**

Please refer to Attachment A. I also seek further or alternative relief to like effect to that sought in my submission, and any consequential amendments required as a result of such relief.

**ATTENDANCE AND WISH TO BE HEARD AT HEARING(S)**

I do wish to be heard in support of my submission.

**SIGNATURE**



.....  
Reg Kemper 15<sup>th</sup> March 2018  
Director, Operations, Lower North Island

Pursuant to delegated authority  
On behalf of  
Lewis Sanson  
Director-General of Conservation

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011.

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
1	Section 1.1 Plan establishment	Support	Notwithstanding some of the specific submission points that follow, I strongly support the Council's initiatives to grow pest management programs in partnership with organisations and land owners.	Note.
2	Sections 2.1 – 2.5 Strategic background.	Generally support.	I support the analysis and documentation of legislative and policy instruments summarised in the document. However, I submit that council could more thoroughly document those pest management, biodiversity and economic objectives and actions which may be better supported by legislative and policy instruments other than the Biosecurity Act.	Review the section to clearly identify those objectives that can only be achieved via the Biosecurity Act as distinct from those objectives where Biosecurity Act powers are secondary to other mechanisms.
3	Section 4. Declaration of Pests	Uncertainty that Biosecurity Act provisions have been satisfied.	I submit that the proposed plan is deficient in the detail of how the organisms to be declared pests satisfy the tests in S.71 & S.72 of the Biosecurity Act. In my Appendix to this submission the Department has identified many anomalies in the Cost Benefit Analysis examples it reviewed and is unable to be assured that "subjects" identified should be declared pests under a Regional Pest Management Plan.	Review cost benefit modelling and share results of other "tests" required to be met before a subject becomes subject to a pest management plan.
4	Section 4.	Pest fish are overlooked.	I submit that pest fish, particularly "Brown bull-headed catfish", Koi carp, Rudd, Tench and Perch that do not currently have any or any significant distribution in Hawkes Bay should have been included in the assessment of potential pests for inclusion in the plan as either exclusion or eradication pests. The importance of freshwater quality to the economy of Hawkes Bay suggests that not considering these species for inclusion is a significant over-sight.	Assessment of and inclusion of identified pest fish as exclusion or eradication pests if assessment is favourable.
5	Section 4.2 Other organisms that may be controlled.	Uncertain how "organisms of interest (ooi)" of limited distribution in Hawkes	Several organisms with limited distribution in Hawkes Bay but known to have significant costs elsewhere are included in the "OOI" list. I note in particular; Boneseed, Climbing spindle berry, Hornwort, Mothplant, Parrots feather and Purple ragwort. I submit that a more comprehensive consideration of whether or not these species should be	Review and document proposed status for Boneseed, Climbing spindle berry, Hornwort, Mothplant, Parrots feather and Purple ragwort including a cost

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
		Bay but known to have significant biodiversity costs elsewhere have been assessed for exclusion from pest status	considered as exclusion, eradication or progressive containment pests is warranted.	benefit analysis.
6	Section 4.2 Other organisms that may be controlled.	Wasps should be included as site based or sustained control	I submit that coordinated input into the control of wasps by council would have a positive benefit for the Region. It is my contention that a site-based approach involving direct control at sites administered by HBRC and sustained control via coordinated actions such as bio control and information support for landowners throughout the Region would be appropriate.	Reconsider pest status for wasp species.
7	Section 4.3 Unwanted Organisms	Support intent but recommend expansion.	I support the intent behind inclusion of commentary on “Unwanted Organisms (UO)” but submit that the section should be edited and enlarged to reduce confusion. It is my contention that the first paragraph of the section should broadly cover the restrictions imposed by UO status particularly the restrictions on sale, propagation and distribution. Detail of the National Interest Pest Response programme and the National Plant Pest Accord would then be in context as “subsets” of the UO group of pests.	Revision and reordering of section.
8	Section 4.3 Unwanted Organisms	Include Noxious fish	Some “harmful organisms” are classified as noxious fish. This classification imposes significant restrictions on persons who may wish to propagate or spread these organisms and give HBRC staff access to authority to survey for and/or destroy the organisms. It is my submission that inclusion of a description of this	Add description of pests covered by noxious fish status, what powers HBRC staff can access and summarise obligation of occupiers with respect to these

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
			classification in the plan would highlight, to occupiers, the limitations that are imposed on them by national pest management decisions and policies such as the noxious fish designation.	species.
9	Section 5.3	Clarify coverage of scope of Written Management Agreement for Crown Agencies	I submit that the proposed 'written management agreement' facility and process is currently designed to provide for resolution of single property to single property 'conflicts'. This is likely to be highly complex and costly (for both the Crown and Council) with respect to Crown Agencies because single large areas of Crown land will border multiple private properties. It is my view that section 5.3 should be reviewed to provide an effective and efficient mechanism for agreed delivery against Good Neighbour Rules by Crown agencies. (I refer Council to S.4.4. of Horizons RPMP as a possible model).	Review S. 5.3 to facilitate efficient 'written management agreement' process between Crown agencies and Council.
10	Section 5.3.3	Support Bio control	I support the sourcing and distributing of biological control agents (where appropriate) by Council.	Note support.
11	Section 6.1	Support exclusion pest programmes	Notwithstanding my concerns with the cost benefit analysis (CBA) outlined in my submission points below and in Appendix 1 and the absence of 'pest fish' from the list, I strongly support Council in its planned approach to exclude the listed pests not yet established in the Region. It is my contention that even a very conservative cost benefit analysis clearly establishes the long-term value to the Region of excluding pests that are not yet established.	Note strong support.
12	Section 6.2	Support eradication with reservation	I generally support objective 2 being the eradication of 8 identified pest plants. My reservation arises from uncertainty as to whether the cost benefit analysis supports the objective. Further to my general concerns about the CBA outlined in my submission points below and in Appendix 1, I note discrepancies between the assumptions and data in the CBA in comparison to the plan details. E.g. the CBA states that the current infested area for	Review CBA for proposed eradication plants and consider alternative program objectives if necessary.

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
			African Feather Grass is 1 hectare whereas the proposed plan states that the current known infestation is 1260 hectares. Similar variation exists for Phragmites, White-edged nightshade and yellow water lily. I am unable to identify whether the CBA analysis would be materially impacted by eradication proposals starting with greater infestation levels.	
13	Section 6.2.9	Inconsistent with National Policy Direction and confusing.	<p>In my view this objective is poorly developed and explained and is not supported by CBA. The lack of certainty for occupiers as to whether they are affected by the proposal is inconsistent with the National Policy Direction for Pest Management (NPD) and the text in both the proposed plan and the 'Possum control technical protocol' is confusing and contradictory. I note in particular;</p> <ul style="list-style-type: none"> <li>• Eradication can only be eradication. Eradication 'where possible' in the identified areas is simply a form of sustained control. It is unclear whether this discussion refers to the region as a whole or the proposed eradication areas.</li> <li>• The plan states (pg. 42) that the option of possum eradication was not included due to not having the tools to achieve this goal.</li> <li>• The possum control technical protocol references 'Map two'. This map does not exist.</li> </ul>	Review of the possum eradication proposal and associated technical protocol to clarify objectives, clearly identify the cost benefit assessment for this objective, clearly identify the affected areas and establish consistency with the NPD.
14	Section 6.2.10	Support eradication with reservation	As for proposed eradication plants I am uncertain whether the CBA supports the eradication objective. I consider there to be much greater uncertainty as to when or if eradication will be achieved than the CBA assumes. This uncertainty and the history of rook control in the region do not support the CBA's contention that the technical and operational risks of achieving the objective are low. I further note that the additional benefits of eradication (between today and 50 years time) are largely accrued by the	Reappraise CBA and review whether eradication or sustained control should be the preferred approach.



	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
			horticulture land use class. That outcome is not reflected in the CBA analysis of who should pay.	
15	Section 6.3	CBA for progressive containment not presented	I note that the CBA analysis for Japanese Honeysuckle and Old Man's Beard are described for a "site led" approach rather than progressive containment.	Clarify whether the CBA for these species has been undertaken for the correct programme.
16	Section 6.3	Progressive containment objectives not clear	I submit that a progressive containment approach to pest control should include an estimate of the reduction in range for the particular species and that none of the species identified are described in such terms. I suggest that the programmes described should be more correctly identified as "sustained control" or "site - led". Such a re-designation may impact on CBA. If progressive containment is to be pursued, then greater detail on the proposed focus of individual programmes is required.	Review inclusion of these species as 'Progressive containment' and review CBA if necessary.
17	Section 6.3.4 and Section 6.3.5	Support identified objectives with reservations	Both Darwin's barberry and Japanese honeysuckle are dispersed widely by birds and have significant impacts on natural values. While I support the identified objectives, I submit that HBRC should consider adopting wider a regional objective for these plants of minimising seed dispersal by seeking bio-control agents that reduce seed production or viability. I also submit that the CBA for Darwin's barberry would support an eradication approach but I am not confident that the calculations are correct.	Identify Darwin's barberry and Japanese honeysuckle as priorities for bio-control initiatives across the region.
18	Section 6.3.7	Concern at Old Man's Beard (OMB) proposal.	I submit that the proposed approach to OMB places significant conservation areas and water catchments at risk of forest collapse should this pest spread into sites such as the Ruahine and Kaweka Ranges. I further note the key sites in the Poutiri a tane project area are at risk from this plant under the plan proposed. I note that Horizons Regional Council have adopted an active management zone for this pest and that this zone provides a buffer of	Reconsider proposed approach to Old Man's Beard.

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
			protection for key high-country catchments including the Ruahine Range. I submit that the proposed approach by HBRC will significantly jeopardise the objectives of their neighbouring council. I further submit that describing the area out of which council will try to keep OMB from establishment as a 'containment area' area is contradictory. In my view the currently infested area should be the containment area and that a programme be designed and adopted to prevent this weed spreading further.	
19	Section 6.3.8	Pinus contorta objectives not clear.	I submit that the lack of clear objectives for Pinus contorta control will jeopardise programme success and invalidate any CBA analysis. I note that in much of the rateable area of the region this species does not have a significant economic impact. Where it is having an impact, it is one of a suite of wilding conifer species that jeopardise the values at risk. The National Wilding control strategy includes a significant investment within Hawkes Bay and it is my contention that HBRC should seek to incorporate the goals of that strategy in its RPMP.	Review P.contorta plan and extend in support of the National Wilding Control Strategy.
20	Section 6.3.1, 6.3.2, 6.3.3, 6.3.6, 6.4.9, 6.3.10, 6.3.11	Support containment	I support the council's intention to contain and reduce the impact, over time, of these 7 pests. However, I note that there is a lack of supporting evidence that the approach proposed will achieve the objective. As this approach has been applied to most of these pests over several previous versions of this plan I expected to see an analysis of progress made to date. (I note a typo in the section heading for Saffron thistle).	Consider refining proposed programmes based on progress to date.
21	Plan rule 5	Rule inconsistent with the National Direction for Pest Management (NPD)	I submit that a plan rule requiring 'all' individuals on the occupier's land to be destroyed is inconsistent with the NPD and guidance material for progressive containment programmes. It would be an appropriate rule within an eradication objective or sections of the region identified for 'roll back' of the area of infestation under a progressive containment programme but not as a blanket requirement.	Review plan rule 5

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
22	Section 6.4	Cost benefit analysis difficulty	I submit that CBAs for a sample of proposed sustained control species do not clearly identify a nett benefit to the Region of Regional intervention where those pests are already widespread.	Review CBAs and decision to proceed with a plan for widespread pests.
23	Section 6.4.1	Support inclusion for Chilean needle grass	I submit that the CBA, limited current distribution and potential impact area support a plan to contain or eradicate Chilean needle grass. However, I also submit that 'sustained control' may be the incorrect objective for this pest.	Reconsider objective for Chilean needle grass.
24	Section 6.4.2	Qualified support inclusion for Privet	I submit that while the CBA does not support planned intervention, public concern about the impact of this pest may provide sufficient justification for HBRC to take concerted action against this pest in urban areas. However, in my view the plan should provide more detail as to why council intend to impose costs on property occupiers.	Review description of justification for proposed programme.
25	Section 6.4.3	Support rule for rabbits	Notwithstanding my concern that the CBA does not adequately account for occupier costs, I submit my support for the proposed Rule "9" because this rule supports the key outcome of sustained control being the reduction of spread from one property to another.	Note support.
26	Section 6.4.4	Possum sustained control plan not supported by CBA	I submit that the proposed plan for sustained control of possums is inadequately analysed in the CBA (see my Appendix 1) particularly with respect to the cost implications for DOC arising from the proposed GNR. I further submit that the arbitrary pest level of 4% residual trap catch rate (rtc) is not adequately supported with evidence that shows that this level of control is necessary to achieve the outcomes desired. I support the philosophy behind landscape scale minimisation of possum impacts but submit that a statutory Pest Management Plan is an inappropriate vehicle for achieving this and is inconsistent with the NPD.	Review possum sustained control plan
27	Section 6.4.5	Predator control plan	I submit that the proposed plan for predator control is inadequately developed and in its	Review sustained predator plan.

	<b>Specific section/ objective/ policy/ rule this submission point relates to:</b>	<b>Position:</b>	<b>My Submission is that:</b>	<b>I seek the following relief from Council:</b>
		inadequately developed.	current form is inconsistent with the NPD for pest management. Key inconsistencies are a lack of certainty for occupiers as to whether they are affected and CBAs that are not specific to the proposal. As for possums I support the philosophy behind landscape scale minimisation of predator impacts but submit that a statutory Pest Management Plan is an inappropriate vehicle for achieving this and is inconsistent with the NPD.	
28	Section 6.5	Sites not identified	I submit that critical elements for 'site led' pest species are identification of the site and identification of the values to be protected at that site. Without that information a site led plan is inconsistent with the NPD.	Describe sites and values to be protected under a site-led plan and review objectives.

## Appendix 1

### Commentary/problems relating to Cost Benefit Analysis

#### Summary

- We are unable to reconcile calculated values in the CBA with the methodology described.
- Pest impact costs appear exaggerated
- Benefit calculations not documented
- No Possum CBA for Site Led programme and confusion as to whether the CBA for possums described is based on Eradication or Sustained Control.
- Full costs of expected programs not included in analysis for pests where the significant costs lie outside Council.

#### General comment

The background section of this document states that a regional council is ‘*required to be cognisant of .....benefits.....associated with the management of pests... ’. It is the department’s understanding that the tests in S.70 and S.71 of the Biosecurity Act go beyond ‘cognisance’ in that S.70.2.c.vii requires an analysis of the costs and benefits of the proposal for each subject (pest). Furthermore, S71.e requires that the council must be satisfied ‘*that, for each subject, the benefits of the plan would outweigh the costs, after taking account of the likely consequences of inaction or other courses of action*’. S.71.f. requires “*that, for each subject, persons who are required, as a group, to meet directly any or all of the costs of implementing the plan**

- (i) *would accrue, as a group, benefits outweighing the costs; or*
- (ii) *contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan.*

These requirements relating to analysis of costs and benefits are repeated in S.74 as matters the council must be satisfied with before it makes the plan.

I therefore contend that a positive benefit to cost analysis is a critical test that the proposal for a “subject” must pass if a plan is to be promulgated not just something the council takes into consideration.

The background section also references Section 76 of the Act, in particular S.76.k. & S.76.l. These sections (76.k & 76.l) do not exist. We conclude that there is a typographical error here.

In the ‘Management options’ section of the introduction we note that the option of ‘no management/voluntary action’ should be included as this is the option against which the benefits of other proposed options are assessed.

In the ‘General assumptions’ section of the Methods section we note that the apparent implicit assumption that voluntary action will not be taken is not stated.

We note that the CBA duration period includes a 50year assessment. We strongly support this approach as it clearly identifies the long-term costs associated with inaction during early stages of establishment of a pest in the region.

Table 5. We note that the adjustment values for low and high dispersal rates appear to have been reversed.

#### Cost benefit analysis for individual subjects

We attempted to repeat the methodology described and check the outputs given for a sample of individual pests. This was attempted because at first glance the described 10year impact costs for Wallaby appeared to be many orders of magnitude higher than we would have expected for a newly establishing pest.

We subsequently checked a sample from each of the management option types presented and are not reassured by the calculations.

## **The examples**

### **Proposed exclusion pest “Wallaby”.**

Wallabies are described as threatening Land use/habitat types Dairy, Sheep and beef, Forestry, Horticulture, Urban Native terrestrial and Coastal. These land use types total 1,388,844 Ha but the model assumes that full occupancy will total 201,536 Ha.

The model assumes that an initial 1 Ha incursion would result in full occupancy after 50 years meaning that the expansion of the infestation can be expressed as  $201,536 = 1 * (1+R)^{50}$ , where R is a constant. R can therefore be calculated as 0.276694692.

The area occupied by wallaby in any year after establishment can therefore be expressed as Hectare occupied =  $1 * 1.276694692^n$  where n=number of years since establishment. After 10 years the distribution of wallabies would cover about 13 hectares.

Because it is not possible to know where wallabies might become established, we consider it most appropriate to base the estimate of potential impact per hectare on the weighted average of potential impact for each of the land use/habitat types. For wallaby the weighted average minimum cost per hectare is \$31.46. Using this figure and the occupancy calculation above gives a minimum 10year Nett Present Value (NPV) of \$1,135.21 as opposed to \$484,442,517 reported in the CBA. Over 50 years the minimum NPV is \$3,769,125.12 as opposed to \$332,199,360,372.

Despite these anomalies, for exclusion species, we do not dispute the value of preventing establishment because the NPV calculations clearly show that the cost of investment of a small amount per year is vastly outweighed by the impact cost should the pest establish and spread to all the available range. The return on an annual investment of \$500/year for 50 years in terms of risk avoidance is approximately 2000fold.

However, we note that \$500 in any year is very unlikely to adequately address an actual or threatened incursion. We modelled the impact of an eradication event spread over two years. We modelled an expenditure of \$100,000/year in years 3 & 4. A cost of this magnitude would only increase the NPV of Council expenditure over 50 years to c. \$177,500 which remains significantly less than the 50year NPV estimate of the cost of wallabies to regional economic value.

We note that Landcare Research includes part Hawkes Bay Region within their modelled spread of dama wallaby under worst case scenario over 50 years. Given this understanding of risk we suggest that the currently proposed annual investment of \$500/year in detection, education and response is likely to be inadequate.

### **Proposed sustained control pest Feral Cat**

In the data summary cats are described as currently having an annual impact on economic value over land use types that total 1,175,322 Ha with the affected area reducing to 1,152,602 over 50 years with the exclusion of urban areas from the potential impact area. The impact per hectare is shown as increasing over time from a weighted average minimum value of \$13.83 today to \$21.29 after 50 years. However, in the “Cost benefit analysis” assumptions the current affected area is given as 1,321,293 Ha for both current and 50year points while minimum current impact is given as \$11.9 per Ha and no figure is given for the impact per hectare after 50 years. We could not reconcile these variations.

We modelled the NPV of impacts assuming that the urban area should be excluded from the calculations in year 1. Minimum impact costs per Ha increase at 0.8% p.a. derived from the current and potential data points given in the CBA. Minimum estimate of NPV of pest impacts was calculated at \$135,515,893 over 10 years and \$401,450,787 over 50 years. Comparative values from the CBA model are \$143,200,004 and \$795,959,363 suggesting that additional assumptions were made in the CBA model. While there is minimal difference over the 10 year period the variation between the 50 year calculations is surprising.

The CBA states that the proposed annual expenditure by Council is \$200,000. We assumed that this cost would be ongoing giving NPV values of \$1,622,179 for the 10year period and \$4,296,437 for the 50 year period. Comparative values from the CBA model are \$300,705 and \$306,860. We cannot reconcile these differences.

The CBA give landowners minimum NPV costs of \$1,956,530 for both the 10 and 50 year periods. We were unable to identify an assumption that cats would be eradicated after 10 years which is the only explanation for these costs being the same. We also note that the NPV cost given in the CBA for the 10 year period suggests an annual cost equivalent to the proposed Council investment (\$200,000/yr). This would suggest a per hectare investment by occupiers of about 17 cents per year. We question whether this level of investment is sufficient to achieve or sustain the 80+% reduction in feral cat impacts indicated by the CBA “No control” versus “Sustained control” pest impact values. We note that, in natural landscapes, DOC’s estimated average annual costs for cat control (2013 data) was c.\$7/Ha/yr.

We note that the proposal to operate a feral cat pest management plan is subject to a site by site landowner “buy in” process. We are unable to see how the uncertainty around that approach or the size of individual sites has been incorporated or “scaled” into the CBA calculation of NPV of impact, council or landowner costs.

### **Proposed eradication pest African Feather Grass (AFG)**

In the data summary AFG is described as currently having an annual impact on economic value over 1 Ha of sheep and beef land use type potentially spreading to a minimum infestation of 48,024 Ha over 75 years. The impact per hectare is shown as increasing over time from a weighted average minimum value of \$7.39 today to \$42.36 after 50 years. We modelled the rate of increase in potential land based on the current 1 Ha extending to a minimum of 48,024 Ha affected after 75 years as being 15.86% p.a. Applying this rate of increase to the initial 1 Ha and multiplying by the weighted average impact cost (\$42.36/Ha) allowed us to calculate a 10year NPV cost of effect as \$655.17, a 50year cost as \$73,900 and a 75year cost of \$1,063,041.29. However, in the “Cost benefit analysis” the 10year NPV cost of effect is given as \$35,222 and a 50year NPV cost of effect as \$29,956,090. We are unable to reconcile the difference between the 10 and 50year estimates.

We modelled the NPV of a Regional Council input of \$12,000 per year which gave a value of \$89,233 whereas the CBA identifies a value of \$101,224. We are unable to explain the difference.

We note that the 50year input cost of eradication is given as \$175,841. We note that no estimated time-period for eradication is given therefore we could not check the 50year NPV input cost.

We repeated our calculations of cost of impacts using the maximum extent value for infestations and the maximum values of potential impact per hectare. NPV values for the 10, 50 & 75year scenarios under these maximum settings were \$1,409, \$341,061 & \$8,359,653.

Regardless of our difficulty with the quoted figures in the CBA we consider that there is sufficient positive benefit for the region over the 50 and 75year time frames to support eradication of AFG especially if spread and impacts are higher than the described minimum levels. We also note that the 75year potential costs would justify a larger investment in eradication in years 1 – 5.

### **Progressive containment pest Darwin’s Barberry**

Using the approach outlined above we estimate the minimum 10year NPV impact cost of Darwin’s barberry to be \$1,942.28 and the minimum 50 year cost to be \$2,484,672.09. These costs compare to the CBA projections of \$77,628 and \$45,236,539.

Calculated NPV values of proposed council costs based on \$40,000/year are \$297,413 over 10 years and \$859,287 over 50 years if expenditure is maintained at that level. The CBA analysis projects \$120,993 & \$127,587 for the equivalent values.

As for other examples we are unable to reconcile the variation between our calculations and those in the CBA. However, we support the contention that there is a positive regional benefit from investing in containment of this species while it has a very limited range.

Based on the data presented we would suggest that, rather than a progressive containment objective, the positive regional benefit and the current limited distribution of this pest are sufficient to support an eradication approach. However, we understand that the current infestation area for this plant is about 5000 Ha. and that therefore progressive containment or a combined exclusion (from parts of the region) and sustained control in infested would likely be a more rational strategy.

### **Sustained control pest species Possums**

We note that the CBA assumes a maximum potential extent within the Region for possums of 45,155 Ha, increasing from a current infested area of 28,448.97 Ha. These figures contradict the description of the council's current program of 948,298 Ha. We are unable to reconcile this difference in the calculations of cost benefit for a program that is described as covering the entire region.

We also note that the proposed plan describes an eradication objective for part of the Region (presumably the 28,448 Ha noted above) but the CBA does not appear to model the costs and benefits of that approach. We modelled the costs and benefits of eradication over 10 years assuming that the area infested by possums would reduce exponentially to zero over the 10 years. We also assumed that minimum impact costs would not increase above current estimates. We estimated that the 10 year NPV of minimum residual costs would be c.\$1.9M and the 10 year NPV of minimum avoided costs (benefit) would be c.\$8.7M. Total costs including council costs would be c. \$11.3M against a benefit of c. \$7.5M (avoided costs less pest value) .

We note that the potential cost calculations for possums for Dairy and Sheep & Beef land use categories appear to be weighted heavily by inclusion of the impact of this pest on the spread of Bovine Tb. In our opinion this is an invalid approach because Bovine Tb is subject to its own National Pest Management Plan and is likely to be eradicated from the region within a few years.

Notwithstanding those concerns, using the approach outlined above for Darwin's barberry etc. and the assumptions described on page 162, we estimate the minimum 10 year NPV impact cost of possums in the programme area to be \$12,058,467.30 and the minimum 50year cost to be \$46,083,681.26 assuming that possums would spread to 45,155 Ha (potential extent described in CBA). While our estimate for 10 year NPV is similar to council's, our estimate for the 50 year NPV is significantly higher than council's.

Our calculation of NPV estimates of council costs over the 10 & 50 year period are similar to council's. However, we are not able to identify which costs apply to possum control areas and which apply to eradication areas.

We also note that no landowner costs, other than compliance costs, are included in the CBA analysis. We are also concerned that no costs have been attributed to agencies in the CBA. The Department of Conservation manages land with a boundary of about 2415 Km with private land within the region. We estimate that ongoing costs to comply with the proposed good neighbour rule (including areas managed by OSPRI for Tb control) would add approximately \$3M/year to our operating budget assuming targeted control is maintained within the proposed 500 metre "buffer". Adding these costs to Council costs as described in the CBA suggest that over the first 10 years of the proposed plan council and DOC could be spending about \$34.3M (NPV) to generate a c.\$10M benefit.

### **Site led pest species Possums**

The CBA index directs the reader to page 226 for the CBA analysis for possums. Page 226 states "Please refer to page 82 for the possum cost benefit analysis". Page 82 contains the analysis for Phragmites. We are therefore unable to assess the assumptions and proposed benefit of management of this pest on a site led-basis.



## Site led pest Rats

Using the approach outlined above for Darwin's barberry etc. we estimate the minimum 10 year NPV impact cost of rats in the programme area to be \$23,359,487.71 and the minimum 50 year cost to be \$66,922,511.98. N.B we were unable to identify why the programme area was described as 128,256 Ha but note the current and maximum infestation areas are described as 121,843 Ha.

These costs compare to the CBA projections of \$61,721,599 and \$152,305,153.

Calculated NPV values of proposed council costs based on \$4,000/year are \$29,741.33 over 10 years and \$85,928.74 over 50 years if expenditure is maintained at that level. The CBA analysis projects \$33,741 & \$89,366 for the equivalent values. We contend that the exclusion of consideration of Landowner and Agency costs from the CBA calculation invalidates the conclusions drawn.

As for other examples we are unable to reconcile the variation between our calculations and those in the CBA. The CBA does not suggest that the range of rats will be reduced over the life of the plan but suggests that the minimum cost of NPV of pest impacts will reduce by \$2,140,704 over 10 years and \$5,846,586 over 50 years. We are unable to see how these figures were derived but assume that the saving must be in prevention of cost increases for the horticulture land use because that is the only land use type whose pest cost is suggested to increase over 50 years without control. This benefit is not reflected in the analysis of funders.

The estimated reduction in pest costs reported in the CBA compared to the minimum cost of no intervention in the CBA suggests that Council expect a reduction in impact of about 3.8%, as a consequence of their expenditure. If this level of reduction is applied to rat impacts generally we do not anticipate any significant benefit for those values that have not been monetarised e.g. biodiversity.

# SUBMISSION



TELEPHONE 0800 327 646 | WEBSITE [WWW.FEDFARM.ORG.NZ](http://WWW.FEDFARM.ORG.NZ)

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**To:** Hawkes Bay Regional Council  
159 Dalton Street  
NAPIER 4110

**Submission on:** **Regional Pest Management Plan 2018-2038**

**Date:** 16 March 2018

**Name of submitter:** Federated Farmers of New Zealand  
- Hawkes Bay Province  
- Wairoa Branch of Gisborne-Wairoa Province

Will Foley  
President of Hawkes Bay Province

Sefton Alexander  
Wairoa Chair of Gisborne-Wairoa Province

**Address for service:** Rhea Dasent  
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We wish to participate in a hearing.

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The Hawkes Bay Province of Federated Farmers and the Wairoa Branch of the Gisborne-Wairoa Province of Federated Farmers (collectively referred to henceforth as Federated Farmers) welcomes the opportunity to submit on the Hawkes Bay Regional Council (HBRC) Regional Pest Management Plan 2018-2038.

Pest management is of primary concern to our members, given the impact it poses to their social and economic viability.

## INTRODUCTION

Federated Farmers understands that HBRC is responding to changes to the Biosecurity Act 1993, including a new National Policy Direction for Pest Management 2015 (NPD-PM). The NPD-PM requires councils to undertake robust cost benefit analysis to determine species for inclusion in the plan, and to develop programme objectives that are specific, measurable and realistic. Only those species that require regulatory intervention will be included in plans.

Federated Farmers would like to see a new Plan deliver timely and well-managed responses to incursions and appropriate controls of existing pests. Over the years, the focus of the Biosecurity Act 1993 and RPMSs has shifted from farm production to include landscape ecology and biodiversity protection. Pest management is acknowledged to deliver important shared benefits to the whole community, including health, indigenous biodiversity, economic production and cultural values. For this reason, we continue to push for alternative and more equitable funding sources and mechanisms for pest management.

## FUNDING

Plant and animal pests have the potential to adversely affect the production potential of farms, pose a health risk to stock and undermine farm conservation efforts. Federated Farmers thanks HBRC for the focus over the past 15 years, on pests affecting agricultural production.

Section 1.1 of the Plan states *“Although over the past 15 years approximately 80% of Council’s biosecurity budget has been spent on pests affecting agricultural production, there have been significant biodiversity gains arising from the delivery of these programmes.”*

Most farmers take the issue seriously and spend significant amounts of time and money (on average \$8 per hectare per year according to the Ministry for Primary Industries) on weed and animal pest management, whether they are required to under a Regional Pest Management Strategy (RPMS) or not.

Currently, the Regional Council collects a targeted rate for animal and plant pest control, wherein all rateable rural land containing 4.0468 hectares (10 acres) and above in the region is rated on an area basis.

Rating Units greater than 200 hectares where more than 90% of the land is covered in indigenous vegetation are excluded, which means they will be zero rated.

A differential rate will be applied to those Rating Units that have between 40 and 400 hectares where more than 75% of the land is covered in production forestry, also any production forestry Rating Units over 400 hectares.

In the 2017-18 Annual Plan, this targeted rate resulted in the following:

### Details of Rates Calculated

Details of Targeted Rates Calculated within each District and City							
Groups of Activities / Rate Type	Districts	Rates set on	Differentials	Calculation Factor	Estimated Rates Revenue 2017-18	Estimated Amount 4.0468 hectare (10acre) property	2016-17 Rate
<b>BIOSECURITY</b>							
<b>Plant Pest Strategy</b>							
	Napier City	Area Basis	4,330	48.9109	\$2,118	\$1.98	\$2,075
	Hastings District	Area Basis	361,980	48.9109	\$177,048	\$1.98	\$173,385
	Wairoa District	Area Basis	263,866	48.9109	\$129,059	\$1.98	\$125,833
	Central HB District	Area Basis	300,685	48.9109	\$147,068	\$1.98	\$145,490
	Taupo District	Area Basis	22,196	48.9109	\$10,856	\$1.98	\$10,490
	Rangitikei District	Area Basis	24,013	48.9109	\$11,745	\$1.98	\$11,711
	<b>TOTAL</b>		977,070		\$477,894		\$468,984
<b>Regional Animal Pest Management Strategy</b>							
	Napier City	Area Basis	4,330	168.11	\$7,279	\$6.80	\$7,169
	Hastings District	Area Basis	298,036	168.11	\$501,037	\$6.80	\$487,751
	Wairoa District	Area Basis	208,123	168.11	\$349,882	\$6.80	\$343,346
	Central HB District	Area Basis	293,420	168.11	\$493,277	\$6.80	\$491,807
	Taupo District	Area Basis	8,293	168.11	\$13,942	\$6.80	\$13,343
	Rangitikei District	Area Basis	24,013	168.11	\$40,369	\$6.80	\$40,462
	<b>TOTAL</b>		836,215		\$1,405,786		\$1,383,877

The general public are increasingly demanding good biodiversity outcomes, and Federated Farmers considers that all ratepayers should contribute financially. Pest and weed control is no longer just for the benefit of

farmers, but for the wider community. The Regional Pest Management Plan acknowledges this public good in Section 1.1 and we agree with the statement:

*“While in the past the majority of Biosecurity activities have been funded by the rural community, this Plan and the programmes proposed, reflect a shift which recognises that for some programmes which deliver increased biodiversity improvement the Regional Community are significant beneficiaries. Funding sources for those programmes have been reviewed to reflect this.”*

We support the shift to include the wider regional community as benefactors, and to seek funding from them. However the proposed 30% general rate still has the potential problem of collecting only very small amounts from urban properties, particularly because land value is used as a basis to strike the general rate.

To enable all ratepayers to contribute in a way that is financially viable for Council to collect, Federated Farmers recommends a hybrid rates funding model, which introduces a flat charge per property for smaller properties as well as the existing area based rate for larger. This will mean that smaller properties are contributing to control as both beneficiaries and exacerbators, while ensuring that the amount of revenue collected remains economic for Council.

Federated Farmers reminds HBRC that there may be funding streams available to the Council other than rates, including private sector partnerships and project sponsorships, and access to Crown funding. We note that to achieve the goals of predator free 2050, the Government is committing an additional \$28 million over 4 years and \$7 million each year thereafter. We would like to see some commitment from the Council to investigating these alternative funding sources to better enable it to deliver services and ensure that the current focus on production pests is upheld if not further expanded.

Federated Farmers believes that the Crown should contribute to pest management on the same basis as any other land occupier within the region. We understand that this is in line with the Department of Conservation (DOC's) “war on weeds”, in which they acknowledge that hundreds of invasive weeds are smothering our native forests, wetlands and coastal areas, harming our wildlife and transforming our natural landscapes (DOC, 2016). The challenge for HBRC is to ensure animal pests on non-rateable, Crown, DOC and Council land are adequately funded and controlled. We urge HBRC to seek more funding from non-rated and Crown occupiers to reflect their beneficiary and exacerbator status under the Plan

Submission:

1. That the wider regional community is acknowledged as receiving benefit from pest and weed control resulting in improved biodiversity outcomes.
2. That the rates funding model for pest and weed control activities includes seeking funding from the wider regional ratepayers and not just farmers.
3. That a hybrid rates model with a flat fee for small <4ha properties is introduced alongside the area-based rate for larger properties, to ensure the amount sought from smaller properties remains financially viable for Council to collect.
4. That more funding from Crown occupiers is sought to reflect their beneficiary and exacerbator status under the Plan.

## AFFECTED PARTIES

### Owners/occupiers

Federated Farmers supports owners/occupiers as being responsible for pest management. This has been the case up to now, and we expect this to continue.

With the increase of large farming operations extending across multiple properties, perhaps the risk of spreading pests and weeds via farm machinery moving between these properties has increased. Individual responsibility to lessen the risk of spread is important.

### Crown agencies

In our July 2017 submission on the discussion document, Federated Farmers asked that HBRC ensure that the central government agencies; DOC, the New Zealand Railways Corporation (Kiwi Rail), the New Zealand Transport Agency (NZTA) and Land Information New Zealand (LINZ) are identified as beneficiaries or exacerbators of pest management in the District. We are pleased to see that this has been done in Section 3.3.2.

We support the national direction that Crown, road and rail authorities carry out pest management on the land they occupy and that they are bound by the Good Neighbour Rule as stipulated by the Biosecurity Law Reform Act 2012 and mentioned in Section 2.2.1 of the Regional Pest Management Plan. The Hawkes Bay Pest Management Plan lays pest management at the feet of individual landowners/occupiers in the first instance in Section 3.3.1, crown landowners should be no different.

Support is given to HBRC's commitment in Section 3.3.2 that it will continue to pursue and maintain relationships with Crown agencies to achieve the objectives of the Regional Pest Management Plan.

On Crown land, proactive pest control is seldom undertaken to the level required, and it is often only done when an obvious problem develops - by which stage it is generally more difficult to control the pest within the boundaries. This situation causes problems for farmers and other landowners who bear the costs of poor pest control on adjoining land when it spreads to their own property. We hope that this situation will be changing for the better.

FFNZ views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and otherwise not required to directly contribute to pest management. While we acknowledge that, for example, DoC often does undertake significant pest management, we consider the good neighbour rule as applied in the Plan will provide a level of clarity and certainty that will ensure the objectives and policies are more likely to be achieved.

In our view, both Kiwi Rail and the NZTA have an important role to play in pest management. The rail corridor has long been frustration for farmers, particularly areas that have not been operational for some time such as the Wairoa-Napier line.

### Territorial Authorities

Federated Farmers supports Section 3.3.3 which binds territorial authorities by the rules of the Regional Pest Management Plan.

One aspect that has been concerning to us nationally is the increasing desire of councils to take esplanade reserves/strips for public access, and then not properly maintaining these. We are pleased that territorial authorities will be responsible for meeting the rules and costs of complying.

## Road Reserves

Federated Farmers is pleased to see that the Council has decided that roading authorities are responsible for controlling pests on the road reserves they occupy in Section 3.3.4. We expect that this includes rest areas, weigh pits and stockpile sites.

Roading contractors often spread pest plants when clearing slips or working on roadsides. They also transport seeds of noxious species with cultivation and harvesting machinery. This is a result of poor hygiene around quarries and river stockpiles, and inadequate cleaning of loaders, buckets and mowers. While of course acknowledging the natural processes of birds and wind, Federated Farmers believes activities contribute to the spread of pests. In our view, the monitoring of metal sources along with contractual obligations on sub-contractors to abide by good biosecurity practice, via a Code of Practice, are needed.

Members have observed with disappointment weeds like Thorny Apple going to seed along roadsides, when they have been busy eradicating any they find on their own properties.

We are also concerned that the use of glyphosate-based chemicals in current roadside-spraying programmes enables resistant weeds to relocate into neighbouring pasture and cropped land. Field Horsetail would be a good example of this. When burnt by glyphosate, the weed isn't killed and in fact comes back thicker.

Federated Farmers asks that the Regional Pest Management Plan state specifically when the good neighbour rule is to be applied to any specified activity, specifically via words to the effect that *"the Good Neighbour rule should be applied to any activity where one landholder's action or lack of action may impact adversely on the resources of a neighbour"*.

### Submission:

5. That Crown agencies; DOC, the New Zealand Railways Corporation (Kiwi Rail), the New Zealand Transport Agency (NZTA) and Land Information New Zealand (LINZ) are identified as beneficiaries or exacerbators of pest management in Section 3.3.2.
6. That Crown agencies are bound by the rules in the Regional Pest Management Plan.
7. Support is given to HBRC's commitment in Section 3.3.2 that it will continue to pursue and maintain relationships with Crown agencies to achieve the objectives of the Regional Pest Management Plan.
8. That Territorial Authorities are bound by the rules in the Regional Pest Management Plan.
9. That roading authorities are responsible for controlling pests on the road reserves they occupy in Section 3.3.4.

## **GOOD NEIGHBOUR RULE**

We support the national direction that Crown, road and rail authorities carry out pest management on the land they occupy and that they are bound by the Good Neighbour Rule as stipulated by the Biosecurity Law Reform Act 2012 and mentioned in Section 2.2.1 of the Regional Pest Management Plan.

We note that the RPMP's Good Neighbour Rules only specifically cover feral goats and possums as shown in Table 2 in Section 4.1, meaning that the majority of pests and weeds in the Plan are not covered by the Good Neighbour Rule.

Many farmers within the region share a boundary with Crown land. These farmers should not have to labour under the boundary control rule only to see their Crown neighbours exempt from it.

Federated Farmers considers that the Good Neighbour Rule should be extended to all pests and weeds that are currently in the Boundary Control status, being: Bathurst Burr; Blackberry; Gorse; Nodding Thistle; Ragwort; and Variegated Thistle.

This means that not only are individual landowner/occupiers responsible for boundary control of these species, the Crown will be bound too.

Plan Rule 11 proposes that possums will be subject to the Good Neighbour Rule and will need to be controlled to 4% RTC within 500m of a boundary of a neighbouring property where a possum control operation is in place.

Federated Farmers supports the Crown being bound by this possum rule as this ensures equity between landowners/occupiers and the Crown. However we're not sure how this will be monitored and enforced as possums are highly mobile animals and can move in and out of this 500m mark.

[OSPRI factsheet RD12](#) on possum home ranges reveals that forest dwelling possums typically have home ranges of 1–4 ha. Possums in more open habitats have larger ranges: 30 ha was measured in one lowland farmland site without forest remnants; and in upland dryland habitats home ranges cover between 5– 54 ha. The large home ranges in open habitats have often been attributed to possums having to cover more ground to find widely scattered resources, such as food or shelter.

Submission:

10. That the Good Neighbour Rule applies to all Boundary Control species.

11. Federated Farmers asks how Plan Rule 11 will be monitored and enforced, given that possums are mobile and move in and out of 500m from a boundary.

**YELLOW BRISTLE GRASS.**

We are pleased that Yellow bristle grass (YBG) has been given an exclusion status.

YBG is a serious concern to our farming peers in Taranaki, and we are keen to prevent its establishment in Hawke's Bay. An aggressive plant, it can quickly become dominant in a paddock. Cows do not find yellow bristle grass very palatable and therefore avoid eating it. This leads to both a serious loss in farm productivity and rapid reinfestation from stock avoidance. Stock health issues are also of concern as the seed heads can cause lesions and ulcers to the mouths of grazing cattle. Where yellow bristle grass has become established, annual feed production is reduced by up to 20%, with associated costs for replacement supplementary feed or pasture renovation.

While Taranaki farmers are making an effort to control YBG on their properties, the main issue is the way it is spreading along road verges. This problem was tackled by a co-ordinate spraying regime on the roadsides, but unfortunately, sprays were being applied incorrectly and YBG continued to move rapidly along road corridors.

One of the challenges controlling YBG in Taranaki was that it was much harder for hill country farms to spray out and re-grass in an attempt to control YBG than it was in flatter terrain. Exclusion for Hawkes Bay is the best option.

Submission:

12. Yellow Bristle Grass is given exclusion status.

## POSSUMS – PCA PROGRAMME

Federated Farmers appreciates the focus HBRC has taken to possum control, and in our view, believe it is critical that possum control still remains a primary focus, given the risk bovine TB poses to cattle, deer and human health. Over the last twenty years, rural ratepayers have contributed millions of dollars to district wide possum control delivering both farm production and biodiversity benefits, which our members are keen to retain.

Federated Farmers believes the current approach to possum control is working, i.e. land owners having two options to maintain low numbers, either via a possum contractor or undertaking their own pest control. Members have a lot of praise for the PCA.

We are disappointed to see that Figure 9 on page 61 shows DoC estate exempt from the Possum Control Areas, and therefore exempt from Plan Rule 11. DoC should play its part in the fight against possums. The Department is quick enough to advocate for more biodiversity rules in District and Regional Plans imposed on private landowners, it would be nice to see DoC carry out more actions on their own property which improves biodiversity goals.

Members have also raised concerns about the nature at which the PCA programme has been rolled out, in particular compulsory sign up to the programme without adequate consultation. We understand this has been in particular a problem for members on large land blocks previously considered OSPRI possum control areas. Federated Farmers is keen to work with HBRC to investigate this issue further, to ensure that any future changes impacting our members are managed appropriately.

We reiterate our question as to how Plan Rule 11 will be monitored and enforced.

### Submission:

13. Federated Farmers continues to support the Possum Control Area Programme.
14. That DoC estate is bound by Plan Rule 11.
15. Federated Farmers asks how Plan Rule 11 will be monitored and enforced, given that possums are mobile and move in and out of 500m from a boundary.

## CHILEAN NEEDLE GRASS

Federated Farmers is disappointed that Chilean Needle Grass has been downgraded from *total control* in the 2013 Strategy to *sustained control* in the 2018 Pest Management Plan, however we recognise that this reflects the reality of the weed in the Region.

Federated Farmers consider this pest poses a significant threat to the sustainability of farming in the Hawke's Bay Region. We note that it is currently managed in the Plan via occupier responsibility, under Rules 6 and 7 (pages 55 and 56.)

The historical control methods, such as spot spraying and spraying boundaries, are labour intensive and expensive. The control in the past has limited success, and it is far from eradication and is not even achieving containment. CNG is still spreading. A substantial study commenced in 2002 in the Hawkes Bay on CNG and later programmes were launched in Marlborough and Canterbury. Part of the national approach would ensure everyone shares their collective knowledge and we progress forward together. Information and awareness programmes have added to the tools to fight CNG. Substantial awareness programmes have been launched within Marlborough District Council and Environment Canterbury to inform farmers in those areas



without CNG of the risks posed by the pest weed and to help them with early identification and their own biosecurity measures needed to ensure it doesn't enter their properties.

In 2011 the herbicide Taskforce was registered for use in New Zealand for NT and CNG. Taskforce, washed into the soil after at least 5mm of rain, is taken up by the roots to kill the plant but also has a residual effect against germinating seeds for between 1-3 years. This result helps control the CNG as the seed bank germinates. This has been an exciting break through for affected NZ sheep and beef farmers. AgResearch has established that CNG, and many grasses were most susceptible to Taskforce while plantain, chicory, lucerne, cocksfoot and some clovers were the most resilient. In cultivatable land, combined herbicides including Taskforce, followed by drilling with cocksfoot, lucerne, clovers, and plantain have resulted in productive pastures, a substantial reduction in CNG though at a significant cost. Some infestations of CNG are in vineyards and on steep un-cultivable land. Taskforce can't be used in vineyards. On steep land Taskforce use requires over sowing of the resilient species to establish pasture post treatment and management strategies to ensure CNG is out competed. This is a promising solution but is still being trialled. Other tools in the arsenal against CNG include the importation of a bio control agent in the form of a rust from South America. Sniffer dogs have also been successfully trained to identify CNG both in its vegetative or seeding state.

We support HBRC's concerns that the current programme places a significant degree of onus on the landowner to identify the pest and alert HBRC biosecurity staff. We are committed to working with HBRC to manage the pest, and therefore support investigating further initiatives to support the current management programme.

Federated Farmers knows that Marlborough District Council has introduced a rule similar to Hawkes Bay Rule 7, Marlborough Rule 7.8.2.4 which restricts hay/silage movement off an infested property, unless it originates from an uninfected area with the agreement of the Council. Marlborough backs it up with another rule about machinery not being moved off an infested property unless its been cleaned or has only operated in uninfected areas, and domestic animals shall also not be moved when they carry seeds or plant parts.

Finally, we note that HBRC have proposed to increase the CNG surveillance programme during panicle flowering (November to December). Federated Farmers supports this proposal, and agrees that this would allow for quicker detection of new populations and a more rigorous compliance monitoring programme. We submit that the resources previously directed to the Privet campaign, could be re-directed to initiatives like this which are likely to provide a greater benefit.

Federated Farmers supports *progressive containment* status, with intensified efforts to ensure it remains on the current infested properties and does not spread further.

We have noticed that the educational material on identifying Chilean Needle Grass needs to be better. The [HBRC Factsheet](#) has no photos of the grass at all, nor does the [HBRC webpage](#). The photos on the [AgPest webpage](#) are of limited use for farmers trying to identify the grass, they either show a zoomed out picture of a paddock or extreme close-ups of the seedhead. The HBRC webpage links to a [video](#) on how to identify the grass, but for farmers with poor internet connections this is unlikely to run well on their computers. Good quality photos of the tuft of grass as well as photos of components of the grass are needed, on a handy single sheet of paper that can be taken out onto the farm. Tips on the likely habitat would be useful too, so farmers can concentrate looking in the right places.

#### Submission:

16. That Chilean Needle Grass has *progressive containment* status, with intensified efforts to ensure it remains on the current infested properties and does not spread further.

17. That educational material is improved by showing good quality photos of the grass on a single sheet of paper that the farmer can keep in their ute.

## PREDATORS – FERRET, STOAT, WEASEL AND CATS

The Plan notes that landowners have been requesting wider predator control programme similar to the Possum Control Areas. Federated Farmers applauds these keen landowners.

Federated Farmers is pleased to see that a predator control programme will operate on a voluntary basis, with Council seeking agreement from individual landowners with a trigger point of seeking 75% of the total Predator Control Area land area in agreement. Seeking individual agreements allows the Council to have direct contact with these landowners and get to know them and their unique pest issues.

We hope the Council's [subsidy on pest control products](#) remains to assist these landowners, as this is an excellent initiative.

We suggest that some of the Council factsheets are updated, as the [Possum Control Area factsheet](#) is from 2004.

### Submission:

18. That the proposed Predator Control Programmes are voluntary.
19. That the Council's subsidy on pest control products remains.
20. That some of the factsheets are updated to ensure they contain relevant information.

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Federated Farmers of New Zealand is a primary sector organisation that represents over 17,000 farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

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Federated Farmers thanks the Hawkes Bay Regional Council for considering our submission on the proposed Regional Pest Management Plan 2018-2028.



16 March 2018

Hawkes Bay Regional Council  
Private Bag 6006  
NAPIER 4142

**By email to:** pestplan@hbrc.govt.nz

**SUBMISSION ON PUBLICLY NOTIFIED PLAN  
Proposed Hawkes Bay Regional Pest Management Plan**

**NAME OF SUBMITTER:** KiwiRail Holdings Limited (KiwiRail)

**ADDRESS FOR SERVICE:** PO Box 593  
**WELLINGTON 6140**  
Attention: Rebecca Beals

**KiwiRail Submission on Proposed Hawkes Bay Regional Pest Management Plan**

KiwiRail Holdings Limited (KiwiRail) is the State Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail Holdings Limited is also the Requiring Authority for land designated "Railway Purposes" (or similar) in District Plans throughout New Zealand. The Palmerston North to Gisborne Line (PNGL) passes through the Hawkes Bay Region.

As we have previously commented rail operations face some unique challenges in respect to plant pest control. These include budget limitations, a network which is very inaccessible for work crews and equipment and therefore difficult to monitor regularly and, our corridor is often used by neighbours to dump weeds and plant pests.

KiwiRail's comments on the Proposed Hawkes Bay Regional Pest Management Plan (Proposed Plan) are set out in the attached table. Insertions we wish to make are marked in **bold** and **underlined**, while recommended deletions are shown as ~~struck out~~ text.

KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail does wish to speak to our submission, and are also happy to provide any further detail should this be required by Council in relation to the matters raised in this submission.

Regards,

Rebecca Beals  
**RMA Team Leader**  
**KiwiRail**

Submission Number	Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)
1.	3.3.1 Responsibilities of Owners and/or Occupiers	Support	<p>KiwiRail note the discussion that owners and occupiers cannot stop an authorised person from entering a site address biosecurity and pest matters.</p> <p>KiwiRail wish to ensure the Regional Council is aware that the rail land is not publicly accessible for health and safety reasons. KiwiRail operate access to the rail corridor via a permit to enter system, which is required to be obtained prior to access for inspection / pest management activities being undertaken. These can be obtained from here: <a href="http://www.kiwirail.co.nz/infrastructure/accessing-the-corridor.html">http://www.kiwirail.co.nz/infrastructure/accessing-the-corridor.html</a></p>	Retain as notified.
2.	3.3.2 Crown Agencies	Support	<p>The discussion around Crown Agencies, and noting in particular the nuance around State Owned Enterprises being bound by any rule under the Proposed Plan, and that this applies to KiwiRail is supported for clarity.</p> <p>KiwiRail also specifically support the discussion that Council will work with the agencies to pursue formal and informal relationships with them to achieve the objectives of the Proposed Plan.</p>	Retain as notified.
3.	3.3.4 Road Reserves	Support	<p>The discussion on road reserves proposes that the roading agencies are responsible for pest management in the road corridors. One of the areas listed where roading authorities are responsible for controlling pests includes '<i>road reserves adjacent to land where the landowner is undertaking programmed pest management</i>'.</p> <p>There is no specific similar provision in relation to the rail corridor, however KiwiRail would support that either 3.3.4 is amended to reflect and provide clarity that KiwiRail is responsible for pest management within the rail corridor, and that as with roads the area adjacent to land that is being actively managed is to be subject to pest management. In effect requiring KiwiRail to be a good neighbour.</p> <p>There area areas of the rail corridor that are fenced off by adjoining landowners and either legally or illegally occupied, and pest management of these areas should fall to those landowners, consistent with the similar situation in relation to roads.</p>	Consider amendment to include rail corridor as appropriate.
4.	5.3 Principal Measures to Manage Pests	Support	<p>1(b) under 5.3 identifies that Written Management Agreements are able to be entered into between the landowner and the Council, and that these will set out what is intended to be undertaken to meet the Proposed Plan. Further the discussion notes that where the landowner is complying with the agreement, no written directions will be received.</p> <p>In the event no change is identified to 3.3.4 to explicitly address rail corridor as well as road reserves, KiwiRail anticipate relying on a Written Management Agreement process. KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken within operational/financial parameters. KiwiRail therefore support the ability to prepare such an agreement. KiwiRail note above that the rail corridor is a unique environment that poses challenges for active pest management, however such an agreement process will give KiwiRail the opportunity to actively manage certain areas at any given time and review the agreement over time to ensure that the corridor is progressively managed in accordance with the Proposed Plan objectives.</p> <p>3(d) notes that Council can perform a service delivery type function, including in relation to the use of control tools and biological agents. Biological control agents have been used by KiwiRail within the rail corridor</p>	Retain as notified.

Submission Number	Proposed Amendment	Support/Oppose/Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)
			as a means of controlling pests, and KiwiRail are willing to work with the Council to further the use of such controls in the region.	
5.	Objective 2	Support	Some of the specific species identified for eradication are known to be located in or near the rail corridor, such as Goat's rue. The Proposed Plan notes that management of pests identified for eradication will be undertaken by the Council. KiwiRail support this and will facilitate access where possible to achieve this, noting the permit to enter process identified above will be required to be followed.	Retain as notified.
6.	Rule 5	Support	<p>Species identified as appropriate for progressive containment that are likely to be in the rail corridor include Australian Sedge, Cotton Thistle, Japanese Honeysuckle, and Old Mans Beard. Objective 5 sets out a range of options to achieve progressive containment of the listed species.</p> <p>Rule 5 sets out that, except where there is an approved Written Management Agreement, the occupier of land is required to destroy the listed species. KiwiRail specifically support the exception proposed in the rule as this enables those parties such as KiwiRail to prepare such an agreement to cover the entire corridor within the region and to focus pest management control activities in accordance with that.</p>	Retain as notified.
7.	Rule 6	Support	As with Rule 5, Rule 6 sets out the requirement to destroy Chilean Needle Grass except where the occupier has an approved Written Management Agreement in place. KiwiRail support this approach.	Retain as notified.



Thank you for the opportunity to make a submission on the proposed pest management plan. Having managed the first pest management plan. I've had a long-term interest in the control of plant pests in the region and in the negative effects of deer on our biodiversity. My submission is as follows:

## Section 6.2, page 35

There are three plants which I believe should be included in the Eradication section:

Hydrilla. I presume this is omitted because its being dealt with by a Government Department.

However, I believe it should be in this list as this is a pest in the Hawke's Bay region where eradication is possible. If it is not to be included in the plan there should be an explanation as to why it is not. If I have missed it my apologies.

Woolly nightshade. This plant is listed in table 6 as a plant under Progressive Containment program's. Woolly Nightshade has been under a total control programme since at least 1992. The location of every plant in Hawke's Bay that has been removed has been recorded and presumably is checked annually. There used to be annual publicity in the local papers at flowering time to ensure that the public was aware of it, I have not seen any of this type of information for a number of years.

After 16 years of intensive control I believe it is at the stage where eradication is eminently feasible and should be aimed for. Progressive containment to me as an excuse for taking the pressure off. Taking the pressure off means there is little effort put in to the eradication program and it will become more common.

How does Council plan to carry out this programme when individual plants are rare and widely dispersed?

This region is at the southern range of Woolly nightshade. It is gratifying to see the effects of the control program over the last 16 years as compared with the results of the very ineffectual programs in the Bay of Plenty, Waikato and especially Auckland. The drive from the Auckland Airport to the city center is a continual reminder of how poor management results in continuing infestations. Don't let's drop the ball on this one - go for the jugular and eradicate it.

Velvetleaf. Velvetleaf is another plant listed in table 6 page 44 under Progressive Containment. Taking into account the huge effort that has been put in in other regions of New Zealand to eradicate this plant it seems a very weak approach that this council has taken to only classify it under Progressive Containment. Surely the objective is to eradicate it. Every effort must be made to get rid of this plant completely.

## Section 6.3.7 48. Old Man's Beard.

Some background for this classification may be of interest. In the first management plan Council set out to begin a long-term program of eradicating all Old Man's Beard from the region. It was accepted that it was both a long-term project and that Council didn't have the capability of achieving it in the short term. The program decided upon was to break the region into three parts; northern, middle and southern. In the first plan Council would concentrate on the northern part - the Wairoa area - with the objective of seeing whether it was feasible to get rid it with the in-house capabilities that Council had at that time. I understand the program has been moderately successful, there is still considerable amounts up the Lake Waikaremoana road but in other areas the amount has been significantly reduced. This is especially so in urban areas.

In the second plan this policy was not continued, instead, I believe because of the amount of old man's beard in the rivers and the very significant amount of work required to control, it was decided not to continue with the programme. Counsellors are now left with a historic area of control. I presume this is better than nothing but I have always been disappointed in the lack of vision that Council had and has in this area. Council seems to give up on long term control of plants in contrast to those with animals.

Section 6.4.2. Privet. The original reason for including privet in the plan was to reduce the impact the pollen had on people's health. People I knew were confined to wheelchairs during the privet season and on a more personal note my wife, when she got within 100 m of a privet tree, developed a runny nose and very bad hay fever. My wife took the opportunity provided by Council to be tested for the privet allergy and she came out with a low susceptibility. I therefore have very little faith in the effectiveness of the test.

Very few people, if any, will get a Doctor's certificate or a positive blood test clearly showing a person to be suffering a privet allergy. If they do I presume only the privet on their section will be required to be removed or will all the privet in the adjacent sections be required to be removed? It is a very good excuse for dropping a long term programme without appearing to do so! Council is abandoning the 16 years of work that was undertaken to reduce the number of privet trees in urban areas throughout the region. In recent years underfunding has meant increasing waiting lists for contractors to remove the plants. Without appropriate funding the project will never be successful and underfunding in recent years has ensured it has not been successful. With this new classification Council should go public and tell people they only imagine that they have a reaction when they get close to a privet tree because the medical allergy tests say so and based on this Council is abandoning 16 years of work.

I'm really disappointed that Council has taken this way of getting out of a project which has cost a significant amount of money to reduce privet plant numbers in the urban areas.

Controlling plants is much more difficult than controlling animal populations for the simple reason plants drop seeds which can lay dormant for many years. Once initial control is achieved, long term monitoring is required to remove successive generations before they seed. Long term commitment is required and this commitment seems to be lacking.

Section 6.5.2 feral deer.

Feral deer are a far bigger risk to the biodiversity in Hawke's Bay than Council obviously thinks.

The biological health of the mountain ranges to the west of Hawke's Bay is essential for the wellbeing of our rivers. Intensive deer control was undertaken for many years to reverse the trend of sub- canopy and ground cover destruction leading to bare ground and the consequent long term instability of the areas. The faulted, shattered and ash mantled underlying greywacke, when exposed to the elements, resulted in massive amounts of erosion with the gravel streaming down the river's.

Since the Regional Council was formed in the early 1990s there has been no effort made to look after the health of these very sensitive mountains. The consideration has been that it is the Department of Conservation's responsibility and so Council left it to them. In recent years the underfunding of the Department of Conservation has led to decreasing emphasis being given to animal pest control in the ranges (except for possums). As a consequence, farmers are now talking of herds of 30 to 40 deer ranging farmland areas. The QE2 Trust is now advocating that members put deer proof fences around their bush covenants to protect them from predation by feral deer. The national emphasis on managing the deer herd for trophies, as promoted by Peter Dunne, will have a very detrimental long-term effect on the stability of our mountain lands in Hawke's Bay. It's a waste of time talking biodiversity protection and enhancement if we don't put a lot of effort into controlling and exterminating the deer herds. Deer and biodiversity enhancement don't go together. I would recommend that the feral deer should be moved up the list from the very weak status you've given it. Personally, I'd like to see them classified under eradication.

Monitoring



To a large part, once numbers are down to acceptable limits, the success of control programmes is dependant on monitoring. My question is how is Council monitoring the extent and spread of these plants?

Conclusion

Thank you for taking the time to listen to these comments. I appreciate that with all the work that you put in to do this plan it is unlikely any changes will be made but at least I've had my say.

Garth Eyles

Geriatric

12<sup>th</sup> March 2018

**Submission on the Hawkes Bay Regional Pest Management Plan**

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**Forest & Bird**  
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**INTRODUCTION**

1. Forest & Bird wishes to be heard in support of this submission. Forest & Bird would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.
2. The Royal Forest and Bird Protection Society of New Zealand (Forest & Bird) is New Zealand's largest independent conservation organisation. It is independently funded by private subscription, donations and bequests. Forest & Bird's mission is to protect New Zealand's unique flora and fauna and its habitat. Key matters of concern therefore relate to the protection of ecological values, particularly the sustainable management of New Zealand's indigenous biodiversity, natural landscapes, and publicly owned land, rivers and lakes.
3. Forest & Bird has a particular interest in ensuring pest management in Hawkes Bay is undertaken in a way that promotes the best outcomes for New Zealand's unique biodiversity.
4. Forest & Bird has local branches in Napier, Hastings/Havelock North, and Central Hawkes Bay. Each of the branches has taken an active role in pest management in Hawkes Bay, in particular in the Little Bush, Blowhard Bush, and the Otaia/Lindsay Bush Reserves.

## **SUBMISSION**

### **Conservation Management Strategy**

5. As proposed, the Regional Pest Management Plan (RPMP) does not include any reference to the Department of Conservation's Conservation Management Strategy (CMS) for the region. Forest and Bird consider the RPMP should note and explain the relationship between the Strategy and the CMS. The legislative basis for this inclusion is Section 66 (2) (c) (i) of the Resource Management Act, which states:

*“Matters to be considered by regional council (plans)...*

*(2) In addition to the requirements of section 67(3) and (4), when preparing or changing any regional plan, the regional council shall have regard to—*

*(c) Any—*

*(i) Management plans and strategies prepared under other Acts;”*

6. This places a responsibility on Hawkes Bay Regional Council to have regard for the outcomes, policies and objectives within the CMS when reviewing the RPMP.
7. The importance of the CMS in planning processes has recently been reiterated in case law that emerged from the Ruataniwha Supreme Court decision.

### **Predator Free 2050**

8. Forest & Bird supports the reference to Predator Free 2050 and the associated objectives and interim goals.

### **Landowner Responsibility**

9. Forest & Bird is largely supportive of RPMP section 3.3.1, which states that pest management is the responsibility of the occupier, and outlines council's ability to take legal action if pests are not managed appropriately. Council should not shy away from a regulatory or compulsory action approach in controlling pest species. Voluntary approaches are beneficial but limited in that they often result in ad hoc and inconsistent results.
10. Similarly, Council should not be reluctant to charge landowners with the costs of pest control on land for which they (the landowners) are responsible. Charging for pest control simply internalises the costs of landowners' activities, which would otherwise be borne by the environment or other landowners, which is unjust and unfair.

### **Road and Rail Reserves**

11. Road and rail verges are primary conduits for the spread of pest plants as they are more commonly disturbed (by road and rail works), which introduces seed and creates conditions

suitable for the establishment of weeds. Roading metal and rail ballast are obtained from many different sources and are often contaminated with seeds.

12. Road and rail verges also provide open corridors through which pest animals can move efficiently—and therefore spread—across long distances.
13. Forest & Bird supports Council's position in section 3.3.4 that roading authorities should be responsible for controlling pests in the road corridor.
14. It is unclear how rail corridors will be managed in the RPMP. We suggest Council adopt the same approach to rail verges as proposed for roads (if this is not already the intention), whereby the rail authority would be responsible for pest management through the rail corridor, and make this clear in the plan.
15. HBRC should encourage the roading industry to develop a code of environmental ethics to address the spread of weeds in gravel. We believe this should be extended to include all agricultural and roading machinery contractors and operators.
16. Weeds are also commonly spread from weed infested gravel. Gravel pits need to be controlled for all weed species and regular monitoring of all gravel pits should be conducted.

### **Good Neighbour Rules**

17. Forest & Bird consider it a significant failure that good neighbour rules appear to apply only to possums and goats in the proposed plan. Such poor coverage of pest species is a severe shortcoming and will be detrimental to the management of pests in Hawkes Bay. The recently adopted Gisborne District Council Regional Pest Management Plan applies a good neighbour rule to almost all listed species in the plan that present a risk in terms of their ability to disperse, including animal and plant species. Forest & Bird suggest HBRC review the Gisborne Plan and align their good neighbour rules with those in the Gisborne Plan.

### **Pest Plants**

18. Forest & Bird supports the existing list of pest plants and consider Council should add the following species to the pest plant list (or organism of interest list where appropriate, i.e. if a species is yet to be found in the region). It is particularly important to consider those species that are currently a problem in nearby regions and may spread to Hawkes Bay, existing species that could increase their spread within Hawkes Bay, and those species that may spread from Hawkes Bay into other regions, particularly with changes in climate.

- Agapanthus
- Barberry
- Bladderwort
- Blue morning glory
- Boxthorn

- Buddleia
- Burdock
- California stink weed
- Cape tulip
- Chilean rhubarb
- Chinese mugwort
- Egeria
- Eleagnus
- Fan palm (*Livistonia & Washingtonia*)
- Giant reed
- Hawthron
- Himalayan honeysuckle
- Holly leaved senecio
- Horse nettle
- Lagarosiphon
- Madeira/mignonette vine
- Mexican daisy
- Mexican water lily
- Monkey comb vine
- Pampas (common and purple)
- Pennisetum/white foxtail
- Periwinkle
- Red cestrum
- Russell lupin
- Salvinia
- Smilax
- Sweet briar
- Star thistle
- Thorn apple
- Undaria
- Water hyacinth
- Wild ginger
- Wilding pines (should be moved from the 'Organism of Interest' (OoI) list to the pest plant list)
- Yucca (species)

19. Forest & Bird views with a great deal of concern the increasing wilding pine infestation within highly vulnerable ecosystems within the Hawkes Bay region, such as that of the Kaweka Ranges. Forestry companies should provide funding for the control of Wilding Conifers and make an effort to control them themselves. We note the real impact that working collaboratively elsewhere in the country has had on reducing the wilding spread trees, e.g. Craigeburn Basin.

20. Pampas is becoming a major weed in and around some significant wetlands and sand dunes together with wildling pines. Good examples are the large wetlands near Wairoa (Whakaki Lake, Maungawhio Lagoon etc.) and Porangahau Estuary.

### **Animal Pests**

21. Forest and Bird is concerned by the effects of all animal pests. To address this Forest and Bird advocates the following policies:

- Prohibition of the farming of mustelids and wallaby.
- Creation of buffer zones around parks and reserves where certain invasive species cannot be farmed. Goats, deer and emu should not be farmed within 5 km of a reserve managed for conservation purposes.
- Prohibition of the farming of known animal pests outside their feral range.
- Control programmes for feral populations of goats, deer, pigs, and other animals as appropriate.
- Prohibition of the grazing of domestic stock in:  
Native forest and shrublands where they prevent regeneration and risk contraction of Bovine TB; and the beds and riparian margins of lakes, rivers, streams and wetlands. Such grazing results in the contamination of waterways, destroys valuable riparian vegetation protecting in-stream values, and accelerates the spread of weeds.

22. Forest & Bird support the existing list of animal pests and consider council should add the following species to the animal pest list:

- Australian magpie
- Chinchilla
- Darwin's ant
- Feral cattle
- Hare
- Hedgehogs
- Peacock
- Plague (rainbow) skink

### **Marine Biosecurity**

23. Forest and Bird is pleased that some invasive marine species have been included in the Plan, e.g. Mediterranean Fanworm and Clubbed Tunicate. However we believe the following organisms should also be included in the exclusion programme:

- European shore (or green) Crab (*Carcinus maenas*)
- Northern Pacific seastar (*Asterias amurensis*)
- Chinese mitten crab (*Eriochelone sinensis*)
- Green seaweed (*Caulerpa taxifolia*)
- Asian clam (*Potamocorbula amurensis*)

- Comb jelly (*Mnemiopsis leidyi*)

### **Napier Port**

24. The RPMP needs to be strategic regarding priorities on the actual and potential threats created by the Napier Port. Surveillance of tourism areas and container depots is a high priority. Issues include:

- Pre border and border biosecurity programmes including risk analysis.
- Marine biosecurity, in particular monitoring and the movement of pests via ballast water.
- Identifying the port of origin, both overseas and other NZ ports, and implementing the appropriate level of response.

### **Phytosanitary Disease**

25. Phytosanitary disease is given particular attention in the plan however this is largely limited to an economic perspective. Forest & Bird notes the significant impact diseases such as myrtle rust could have on the local environment and conservation efforts, as well as industries such as beekeeping, and recommend council add myrtle rust to the list of exclusion pests or OoI list as a minimum. Council needs to take a proactive approach to the risk myrtle rust poses to the region, particularly as the climate continues to change.

### **Aquatic Pests**

26. Introduced plant and animal pests have invaded a significant proportion of New Zealand's freshwater ecosystems and pose a substantial environmental and economic risk to the region. Many of these pest species have a substantial impact on ecosystems and native species, as well as on recreation and tourism opportunities/benefits.

27. The Plan should establish an aquatic pest list. Council could work with DOC to establish which species should be included on this list.

28. Council should consider the inclusion of these pest fish species in particular:

- *Ameiurus nebulosus*, Brown bullhead catfish
- *Carassius auratus*, Goldfish
- *Cyprinus carpio*, Koi carp, common carp
- *Gambusia affinis*, Gambusia
- *Gobio gobio*, Gudgeon
- *Leuciscus idus*, Orfe, golden orfe, ide
- *Perca fluviatilis*, Perch, redfin perch
- *Scardinius erythrophthalmus*, Rudd
- *Tinca tinca*, Tench

## **Deer, goats and pigs**

29. Forest & Bird believe a strong stance is required on feral pigs, goats and deer as these species in conjunction with possums are a serious barrier to indigenous forest regeneration.
30. Forest and Bird notes that the Department of Conservation's Policy Statement on Deer Control clearly states that feral deer are a serious pest. This is not incompatible with deer farming operations that maintain high standards as has been demonstrated around New Zealand.
31. Forest & Bird are concerned about the number of feral deer in some areas of Hawkes Bay and the impact they are having on native vegetation. Feral deer are largely ignored in our lowlands. Forest & Bird support the inclusion of deer in the list of pest animal species, and encourage the HBRC and the Department of Conservation to work cooperatively to control feral deer in the Hawkes Bay. Forest & Bird also believe HBRC should have the ability to manage feral deer on private property where required or work with landowners to achieve deer control on private property.
32. Forest & Bird suggest a rule requiring farmers with these species to ensure that their boundary fences are in good order, with penalties for breaches. Landowners should be charged for control operations where there are breaches of the boundaries.
33. Forest and Bird are aware of numerous illegal releases of deer and pigs throughout New Zealand which are causing significant conservation problems. A tough stance from HBRC will send strong signals that the illegal release of pest species will not be tolerated.

## **Pest Management Programmes**

34. Forest & Bird support section 5.2 'Pest management programmes' and the associated management actions available to Council.

## **Information on Animal Pest Control**

35. Forest & Bird recommend the inclusion of an explanation on the benefits and impacts of toxins used in the control of animal pests. This would inform and raise public awareness of the facts associated with tools such as 1080. This could be presented in a tabular format and be informed by the information put together by commercial and conservation organisations on the website <http://www.1080facts.co.nz/> as well as that put together by the Parliamentary Commissioner for the Environment.

## **SUBMISSION ENDS**



Donald Bauckam

I would like to bring to your attention ;

That possum control is only required where the "land owners property is greater than 4ha".  
We presently live in an area where we carry out pest control thru a contractor.  
A lot of effort is put into eradicating possums from our farm.

It is very disheartening when I drive thru "lifestyle block" areas to find dead possums on the roads and learning that these folk are exempt from possum control efforts.

When you have areas of multiple lifestyle properties backing onto one another and then bounding a large farm it makes life rather difficult for a farmer to meet his obligations when his neighbours are exempt as their properties are under your 4ha threshold.

These properties could cover 50ha or more in total with areas of bushline included

I'm not sure if enacting the "good neighbour rule" would achieve anything as it only covers 500mtrs?

Basically my arguement is if you live in a rural area you abide by the same rules as everyone else.  
No one should be exempt if you wish to have a total irradiation of possums & pests as proposed by our previous government.  
Otherwise this is another waste of ratepayer / taxpayer dollars and a half hearted attempt to do a proper job.

Yours Sincerely

Donald Bauckham

## **Hawke's Bay Regional Council Regional Proposed Pest Management Plan Submission by**

Jessi Morgan on behalf of Morgan Foundation  
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Mobile 021 241 9251  
jessi@morganfoundation.org.nz

**16 March 2018**

### **This submission is on the proposed Regional Pest Management Plan**

Firstly we'd like to commend you on a comprehensive and detailed plan. Hawke's Bay Regional Council have been involved in some inspirational landscape scale predator projects and we commend you on your work to date.

This submission is in regards to **Description of Feral cats (p.64)** which is used in two parts of the proposed plan:

**6.4.5 Managing Predators (ferret, stoat, weasel and feral cat) for sustained control p.63**

**6.5.1 Feral cats to be managed under site-led programmes p.78**

We support feral cats being included as a pest for sustained control and suggest councils accepts this inclusion in the plan.

We support feral cats being included as a site led pest and agree that there are sensitive wildlife areas where it is essential for cats to be managed to achieve desired biodiversity outcomes.

However the definition of a feral cat (p64) is not useful enough for cat control to be carried out near populated areas.

The Morgan Foundation would like to see the term "feral cat" renamed to "pest cat" (as per Auckland Council Proposed RPMP). This would ensure all unowned wandering cats were included in the definition.

We suggest council change the term "feral cat" to "pest cat".

The Morgan Foundation would also like to see a clearer definition of a feral cat so that cats can be managed in sensitive wildlife areas near populated areas. An appropriate definition would define a feral cat as any cat without a registered microchip, collar or harness. Therefore where it was determined that cat control was necessary to protect biodiversity at a site near a populated areas it would be possible to determine which cats were owned and which were unowned.

We recognise that council may not be focused on sites near populated area but are confident that you will need to be during the lifespan of this plan. There may also be community groups that are working at sites near populated areas where cats are a problem. Therefore in order to future proof the plan we would suggest improving the definition of a feral cat to ensure cat control can occur near populated areas in future.

Using a definition of a registered microchip means that near specific cats, owned cats would need to be microchipped. This would allow any cats trapped within the area to be identified as owned or pest. Any microchipped cats could be safely returned to their owners (letting

them know their cat has been found in a sensitive wildlife area), and any other cats could be rehomed or humanely euthanised.

Wandering cats have an impact on native biodiversity through the predation of native birds, reptiles and insects. Studies have shown that in populated areas cats kill native birds faster than they can breed. The damage inflicted on native lizards and invertebrates is unknown but probably even greater. This is a huge issue for our native wildlife, and one we need to deal with.

Cats are one of the biggest threats to the predator control work done by HBRC, landowners and community groups. Currently cat control near populated area is unfeasible because there is no clear means of determining if a cat is owned or not.

Microchipping and managing cats also brings many side benefits. It is good for cat welfare, which is why it is promoted by the SPCA and NZVA. Following the Christchurch Earthquake microchipped cats were far more likely to be returned to their owners.

Cats also have an affect on primary production and human health. So controlling pest cats is beneficial to all.. Cats are the primary transmission vector for toxoplasmosis, a serious illness in both humans and sheep. Most farmers immunise their sheep but the immunisation is not 100% effective and storms of toxoplasmosis can still devastate flocks. Toxoplasmosis should also be listed in the description of feral cats.

There is currently no mention about the creation or supporting of cat colonies within the region. There are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies.

Abandoning cats should also be considered an offence.

Jessi Morgan on behalf of:  
Predator Free New Zealand Trust  
190 Taranaki Street  
Wellington  
New Zealand

[jessi@predatorfreez.org](mailto:jessi@predatorfreez.org)

021 467 122

I DO wish to be heard in support of my submission; and would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing.

Dear councillors,

Firstly the Predator Free New Zealand Trust would like to commend the Hawke's Bay Regional Council on the work to date, especially with regard to maximising primary production at the same time as improving biodiversity. The involvement and consultation with landowners should also be commended. The challenge to achieve a predator free New Zealand is as much a social challenge as it a technical challenge.

The engagement with communities and landowners is important to earn trust and the licence to operate.

The Proposed Pest Management Plan is comprehensive and well thought out. Your team should be congratulated for that. In general we are very supportive of the plan that is proposed.

The plan has a comprehensive list of predators including possums, feral cats, rats and mustelids (stoats, ferrets and weasels) as pests.

Feral cats are highly skilled hunters and have been branded as 'the ultimate predators' in New Zealand. New Zealand's unique native wildlife is particularly vulnerable to predation by cats. Cats are also the major vector for the spread of toxoplasmosis which causes abortions in sheep and illness in humans.

The current plan includes feral cats but in our opinion a clearer definition of a feral cat is needed so cat control can happen as locations near populated areas. We are recommending that feral cats are termed "pest cats" to include all unowned cats. We are also recommending that "pest cats" are defined as a cat without a

microchip. Whilst we realise the current focus of the council is at more rural sites we suggest making changes to the feral cat definition will future proof the plan.

We support the recommendation to reduce the residual trap catch (RTC) rate for possums from 5% to 4%. We also support the 'good neighbour' rule for possums. These are both positive changes for those undertaking predator control.

We are really supportive of the new innovative programme that allows Possum Control Areas to be converted to Predator Control Areas where there is community support. is a great initiative to help support landowners in the the control of predators on their land.

Overall the Trust is very supportive of the plan and HBRCs ambitious plans to play their part in creating a predator free new zealand. Hawke's Bay is already leading the way in large landscape scale projects and has provided important learnings for others, and should be commended for this.

#### **4.1 Organisms declared as pests p.23**

We support the list of animals declared as pests however would like council to consider the addition of hedgehogs as a pest for site-led management.

We suggest council adds hedgehogs as a site-led pest.

#### **6.2.9 Managing Possums in eradication programmes p.41**

We support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. We support the plan to eradicate possums and for council to embrace new technologies as they become available to eradicate possums.

We suggest the council accepts this addition to the plan.

#### **Plan Rule 3 p. 42**

We support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.

We recommend that council accepts this change to the plan.

#### **6.4.4 Managing Possums for sustained control**

Objective 9 p.61

We support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
We recommend council accepts this addition to the plan.

### **Plan Rule 10 p.62**

We support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so We support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

### **Good Neighbour Rule for Possums - Plan Rule 11 p. 63**

We support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

## **6.4.5 Managing Predators (ferret, stoat, weasel and feral cat) for sustained control p.63**

### **Description of Feral cats p.64**

We support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst we understand the current focus of the council is on rural land we believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. In order to protect domestic cats and also to allow cat control to occur in areas near urban settlements we believe feral cats need to be defined as a cat without a registered microchip.

We also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

We would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

We would like council to change the definition of a pest cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

### **Managing Predators (ferret, stoat, weasel and feral cat) for sustained control - Plan rule 12 p65**

We support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. We highly commend the council in their active engagement with communities in order to establish these areas.

Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

We suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

We support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst we understand the current focus of the council is on rural land we believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. We believe feral cats need to be defined as a cat without a registered microchip.

We also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

We would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.

We recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5.5 Mustelids to be managed under site-led programmes p.80**

We support the inclusion of mustelids (stoats, ferrets and weasels) as a site-led pest.

We suggest council accepts this inclusion.

#### **6.5.6 Possums to be managed under site-led programmes p.80**

We support the inclusion of possums as a site-led pest.

We suggest council accepts this inclusion.

#### **6.5.7 Rats to be managed under site-led programmes p.80**

We agree with the inclusion of both Norway and Ship rats as site-led pests

We suggest council accepts this inclusion.

#### **6.5 Hedgehogs and mice**

We would like to see the inclusion of Hedgehogs and mice as pests to be managed under site-led programmes.

#### **Objective 13 p.80**

We support Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

We suggest council accepts this inclusion.



**Name**

Mary Gray

**Organisation (If applicable)**

E.C.O.E.D.

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council. I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region. I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

I am involved with trapping on DOC land in the Kawekas. There has been a noticeable increase in feral cats the last few years.

### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

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### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

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I have read the information above and agree to continue with this submission.

**Name**

Conor Paul

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

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Council should accept this proposed rule.

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Council should accept this proposed rule.

**Description of feral cats p.64**

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#### **Managing predators for sustained control - Plan rule 12 p65**

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I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

Urban rat problems are noticeable near Bluff Hill lookout and on the park below on the Port side.

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I have read the information above and agree to continue with this submission.

**Name**

Brendan Veale

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

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**Plan Rule 3 p.42**

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**6.4.4 Managing possums for sustained control p.69**

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Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

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Council should accept this proposed rule.

**Description of feral cats p.64**

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I would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

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#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

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I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

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I have read the information above and agree to continue with this submission.

**Name**

Karin Johansson

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

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Council should accept this proposed rule.

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Council should accept this proposed rule.

**Description of feral cats p.64**

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#### **Managing predators for sustained control - Plan rule 12 p65**

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**Name**

Martin Broadbent

**Do you wish to make an oral submission?**

- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**6.2.9 Managing possums in eradication programmes p.41**

I not support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

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I suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

Predator Free 2050 are not to be trusted about their lies about cats especially.

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I have read the information above and agree to continue with this submission.

**Name**

Mike Currie

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

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**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

**Public information – all information contained in this submission, including names and addresses for service, will become public information. Your information is held and administered by Hawke's Bay Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.**

I have read the information above and agree to continue with this submission.

**Name**

P Gilliland

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.  
Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.  
I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would NOT like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I do not support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I do not support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would NOT like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

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I have read the information above and agree to continue with this submission.

**Name**

C MCCULLOCH

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I DO NOT support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I DO NOT support the plan to eradicate possums.

I DO NOT suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I DO NOT support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.

I DO NOT recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I DO NOT support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.

I DO NOT recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I DO NOT support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I DO NOT support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should NOT accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I DO NOT support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should NOT accept this proposed rule.

**Description of feral cats p.64**

I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.

I also DO NOT suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would NOT like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would NOT like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas.

Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council DOES NOT accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also DO NOT suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would NOT like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I DO NOT recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I DO NOT support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.

I DO NOT agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I DO NOT suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would NOT like hedgehogs and mice included as a pest to be managed under site-led programmes.

I DO NOT suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

I DO NOT SUPPORT ANY NOTION OR METHODS UNDERTAKEN TOWARDS A PREDATOR FREE NZ. I DO NOT SUPPORT PREDATOR FREE NZ, NOR USING POISON TO ACHIEVE SUCH A STUPID GOAL. I TOTALLY STAND AGAINST ANY UNDERTAKING TO CLASS CATS AS PESTS AT ALL. I ALSO DO NOT SUPPORT THE UNDEMOCRATIC WAY THAT THIS SUBMISSION HAS BEEN DESIGNED...WHERE IS THE OPTION TO DISAGREE?

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I have read the information above and agree to continue with this submission.



**Name**

Keryn Parkes

**Do you wish to make an oral submission?**

- I DO wish to be heard in support of my submission; and if so

**6.2.9 Managing possums in eradication programmes p.41**

I dont support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums do not pose a threat to both primary production and biodiversity outcomes. I dont support the plan to eradicate possums.

I suggest the council doesn't accept this addition to the plan.

**Plan Rule 3 p.42**

I dont support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.

I do not recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I DO NOT support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will not minimise adverse effects on environmental values and economic well-being within the region.

I DO NOT recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I DO NOT support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to NOT monitor adherence to this rule and so I DO NOT support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should NOT accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I DO NOT support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. NOT Controlling possums protects primary production and biodiversity.

Council should NOT accept this proposed rule.

**Description of feral cats p.64**

I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and ARE NOT destructive to our native wildlife. Feral cats DO NOT differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats DO NOT exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to NOT be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.

I also suggest NOT changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to NOT rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to NOT change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.  
STOP THIS INSANE PROPOSAL ON CLASSIFYING CATS AS PESTS. THIS OBJECTIVE IS GOING TO ENCOURAGE ANIMAL CRUELTY IN SHOOTING, GIN TRAPPING, WRINGING CATS NECKS IN THE MOST INHUMANE WAY OF COMPANION SENTIENT ANIMALS. THIS OBJECTIVE HAS TO BE STOPPED. THERE IS ALREADY ENOUGH ANIMAL ABUSE IN NZ, THIS POLICY IS GOING TO ENCOURAGE IT EVEN FURTHER.

#### **Managing predators for sustained control - Plan rule 12 p65**

I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly DO NOT commend the council in their active engagement with communities in order to establish these areas.

Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I DO NOT suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I DO NOT support the inclusion of feral cats at specific sites. Feral cats DO NOT differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats DO NOT exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I DO NOT believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.

I also suggest DONT change the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to NOT rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I recommend council NOT changes the definition of a feral cat to a cat without a microchip. This would NOT allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I DO NOT support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.

I DO NOT agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I DO NOT suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would NOT like hedgehogs and mice included as a pest to be managed under site-led programmes.

I DO NOT suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

PEST FREE 2050 HAS TO BE MANAGED HUMANLY. POSSOMS ARE VEGETARIANS AND DO NOT PROPOSE A THREAT TO BIRDLIFE. THERE ARE NO FIGURES TO BACK THE CAT DEVASTATION ON BIRDLIFE. TOXIPLASMIS IS A NATURALLY OCCURRING TOXIN THAT IS PART OF THE ECOSYSTEM, AND WILL NO DOUBT INFILTRATE WATERWAYS AFFECTING MARINE LIFE - THEIR BIGGEST THREAT IS OTHER PREDATORY MARINE LIFE. INHUMANE KILLING OF POSSOMS, CATS AND HEDGEHOGS WILL INCREASE THE PUBLICS PERCEPTION OF CARING FOR SENTIENT BEINGS, PART OF THE ANIMAL ACT THAT IS NZ IS RENOWN FOR GLOBALLY. DROP OF DEVASTING 1080 AND VIRUSES ON THE ANIMAL POPULATION ALREADY EXISTS, DONT EXACERBATE ANIMAL CRUELTY.

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**who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.**

I have read the information above and agree to continue with this submission.

**Name**

Linda Mayne

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I DO NOT support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I DO NOT support the plan to eradicate possums.

**Plan Rule 3 p.42**

I DO NOT support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I DO NOT recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I DO NOT support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I DO NOT recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I DO NOT support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I DO NOT support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I DO NOT support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should NOT accept this proposed rule.

**Description of feral cats p.64**

I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DEFINITELY DO NOT believe feral cats need to be defined as a cat without a registered microchip.

I DO NOT suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I STRONGLY OBJECT TO COUNCIL RENAMING feral cats to "pest cats" to include all unowned cats -

stray and feral.

I would NOT like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I DO NOT commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.

I OBJECT TO THE SUGGESTION OF changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would NOT like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I DO NOT recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I DO NOT support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.

I DO NOT agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I SEE NO REASON WHATSOEVER WHY hedgehogs and mice included as a pest to be managed under site-led programmes.

I OBJECT TO COUNCIL placing hedgehogs and mice as a site-led pests.

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I have read the information above and agree to continue with this submission.

**Name**

Lyn Gribble

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

I DO NOT SUPPORT THIS IN ANYWAY. LEAVE THE CATS ALONE.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

WHAT ARE YOU THINKING. CATS WILL SUFFER WHEN OWNERS DONT MICROCHIP. THIS INCLUDES COLONY CATS THAT HAVE BEEN NEUTERED AND ARE BEING FED. LEAVE THEM ALONE AND LOOK AT THE EVIDENCE IT IS PEOPLE, CARS AND NOT CATS CAUSING THE DAMAGE. YOU PEOPLE GO TOO FAR AND THIS IS RIDICULOUS.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

LEAVE CATS OUT OF IT. THEY PROVIDE COMPANY TO PEOPLE AND FORM AN IMPORTANT PART IN OUR SOCIETY. IT IS RIDICULOUS AND BARBARIC WHAT IS BEING PROPOSED.

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I have read the information above and agree to continue with this submission.

**Name**

Wendy Blount

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.  
Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.  
I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.



I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest not changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to not change the name "feral cats" to "pest cats" to include all unowned cats - stray and feral.

I recommend council does not changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

With the recent malfunction of some micro chips, how would you guarantee that there would not be owned cats from being destroyed. You cant!

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I have read the information above and agree to continue with this submission.

**Name**

Greg Hart

**Organisation (If applicable)**

Mangarara - The Family Farm

**Do you wish to make an oral submission?**

- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I

believe feral cats need to be defined as a cat without a registered microchip.  
I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes.  
I suggest council adds hedgehogs and mice as a site-led pests.

#### **Other comments**

I am very appreciative of the work HBRC has completed on this farm to basically eradicate possums (not one seen in over 14 years) which has enabled us to plant over 106,000 trees on the property since 2008 which would not have been possible if possums were at previous levels. I am also grateful for the support HBRC has given us to implement a pest control trapping system in a QE2 block of native bush on the farm in partnership with other businesses and individuals. Thanks to these initiatives life is exploding at Mangarara Station.

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I have read the information above and agree to continue with this submission.

**Name**

Susan Mottram

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission
- I DO wish to be heard in support of my submission; and if so
- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**6.2.9 Managing possums in eradication programmes p.41**

New evidence from Landcare Research does not support the theory that possums damage the forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false.

**Plan Rule 3 p.42**

I do not support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.

New evidence from Landcare Research does not support the theory that possums damage the forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false.

**6.4.4 Managing possums for sustained control p.69**

I object to objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.

**Plan Rule 10 (Possum Control Areas) p.62**

I DO NOT the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I do not support Plan Rule 11 p 63

**Description of feral cats p.64**

I do not support the inclusion of feral cats for sustained control. I do not support the label pest when referencing cats.

**Managing predators for sustained control - Plan rule 12 p65**

I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. New evidence from Landcare Research does not support the theory that possums damage the forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false. i recommend the council rejects Plan rule 12.

**6.5.1 Feral cats to be managed under site-led programmes p.78**

I do not support the inclusion of feral cats at specific sites. Cats are not referenced as pests in the Animal Welfare Act and council have no power to change this legislation.

#### **6.5 Hedgehogs and mice**

I reject any management of hedgehogs and mice, its an ecosystem and mice are a valuable food source for raptors.

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I have read the information above and agree to continue with this submission.

**Name**

Kay Griffiths

**Organisation (If applicable)**

The Conservation Company

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes.

I suggest council adds hedgehogs and mice as a site-led pests.

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I have read the information above and agree to continue with this submission.

**Name**

Nick Ratcliffe

**Do you wish to make an oral submission?**

- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.



I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes.

I suggest council adds hedgehogs and mice as a site-led pests.

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I have read the information above and agree to continue with this submission.

**Name**

Blair Rossiter

**Do you wish to make an oral submission?**

- I DO wish to be heard in support of my submission; and if so

**6.2.9 Managing possums in eradication programmes p.41**

I do not support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums by other means than aerial 1080 .  
I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.  
Only through the continued use of trapping.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.  
Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.  
I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.

I would like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance. I suggest you remove deer from the list.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests. Controlled without the use of poison in the community.

#### **Other comments**

We already have the wide spread use of poisons be they baits or sprays. Zero human health studies have been undertaken on the long term effects on the environment or people living amongst these poisons.

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I have read the information above and agree to continue with this submission.

**Name**

Tim McCormick

**Do you wish to make an oral submission?**

- I DO NOT wish to be heard in support of my submission

**6.2.9 Managing possums in eradication programmes p.41**

I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums. I suggest the council accepts this addition to the plan.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.  
Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.  
I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.

I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.

#### **Managing predators for sustained control - Plan rule 12 p65**

I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.

I suggest council accepts Plan rule 12.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.

Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.

I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.

I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.

I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.

#### **6.5 Pest to be managed under site-led programmes p.80**

I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.

I suggest council accepts these inclusions and Objective 13.

#### **6.5 Hedgehogs and mice**

I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests.

**Public information – all information contained in this submission, including names and addresses for service, will become public information. Your information is held and administered by Hawke’s Bay Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.**

I have read the information above and agree to continue with this submission.

**Name**

Anne Batley Burton

**Organisation (If applicable)**

The NZ Cat Foundation

**Do you wish to make an oral submission?**

- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

**6.2.9 Managing possums in eradication programmes p.41**

i Do not support Oosdum eradication plans There is no longer a need since The TB virus is practically non Existent.

**Plan Rule 3 p.42**

I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.  
I recommend that council accepts this change to the plan.

**6.4.4 Managing possums for sustained control p.69**

I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.  
I recommend council accepts this addition to the plan.

**Plan Rule 10 (Possum Control Areas) p.62**

I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.

Council should accept this proposed rule.

**Good Neighbour Rule for possums - Plan Rule 11 p. 63**

I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.

Council should accept this proposed rule.

**Description of feral cats p.64**

I totally oppose your propositions.

Under the Animal Welfare Act, cats are sentient beings and there are many reasons ( if you took the time to think about them) as to why they should Never be categorized as pests!

There is something inherently wrong with anyone who would take this point of view. Forca syart considering the fact that Virbac have acknowledged that microchipping is faulty and there are at least 15000 cats / Pets out here between 2012 and 2017 with faulty chips it is a total disgrace and totally unacceptable that these cats could be killed through lack of a readable microchip!

What is wrong with you people? Apart from that , the stray cats already in the community are no different from the domestic cats at the end of your bed . Through no fault of their own they have become stray - largely through irresponsible people! Also the research you are basing this movement on is false and it is a sad situation when you allow the likes of Gareth Morgan and the cat haters to be more listened to than Bob Kerridge who for 35 years has been the leader in Animal Welfare in NZ and CEO of the SPCA! This is faulty research funded by cat haters.

#### **Managing predators for sustained control - Plan rule 12 p65**

I do not support the Council. They are ill informed.

#### **6.5.1 Feral cats to be managed under site-led programmes p.78**

Quite frankly you people are no different from Hitler and The Nazis .why should a cat without a microchip suddenly become a pest? Identification - don't worry that's all it is. And then we push you into the gas chambers.

Wake up ! These cats are sentient beings and you people are becoming fanatical.

#### **6.5 Pest to be managed under site-led programmes p.80**

I do not support cats being included as pests! They are the most loved companion animals in the world whether microchipped or not ( lost and stray or not) . Nz is fast becoming a joke around the world as KILLERS of defenseless animals in the Name of Conservation!

#### **6.5 Hedgehogs and mice**

i do not think hedgehogs and mice should be included as pests!

#### **Other comments**

Wake up NZ! Stop killing in the name of Conservation. And our cats - microchipped or not- are never going to be pests!!!!!!

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I have read the information above and agree to continue with this submission.

## The New Zealand Cat Foundation



### Helping The Helpless

### Submission to HBRC Regional Pest Management Plan Review

**Feline Rights New Zealand strongly opposes the inclusion of 'feral' Cats for sustained control. Cats as the apex predator are valuable assets who contribute to the control of both rodents and mustelids. Remove the apex predator from an ecosystem and this results in what is known as the mesopredator release effect. We append a paper from the Journal of Animal Ecology entitled 'Cats Protecting Birds: Monitoring the Mesopredator Release Effect' which covers the scientific perspective in detail. In New Zealand there are documented instances where the removal of Cats from a locality has resulted in a explosion of the rat population which in turn has had a marked adverse impact on birdlife.**

**In 2013 in Raglan, persons known to be birdlife enthusiasts took it upon themselves to kill all Cats they could find in Raglan West. One resident had six of her Cats murdered for the cause of 'conservation'. The local vet clinic documented a total of 16 missing Cats over a period of 12 months in Raglan West.**

**9 September 2013 - Raglan Cat Lover Wants Out As Killings Continue**

<http://www.stuff.co.nz/waikato-times/news/9142152/>

**Within three months, local ecological consultant Adrienne Livingston is on record in the media stating: "I am now observing the effect the marked absence of Cats is having on this suburban ecosystem". She expressed concern about the number of half-eaten eggs and dead chicks appearing, all killed by rodents the Cats would have dealt with were they still around to do their job.**



18 December 2013 - Raglan Cat Killings Annihilate Local Birdlife

<http://www.stuff.co.nz/environment/9531706/>

During winter 2016 DOC put the idea of a predator proof fence for Rakiura/Stewart Island on hold and decided they would first go after Cats. Media reports at the time suggested the Morgan Foundation and Predator Free Rakiura were involved in funding the mass execution of Cats on Rakiura/Stewart Island.

12 June 2016 - DOC Puts Stewart Island Predator Fence On Backburner

<https://www.stuff.co.nz/environment/80940208/>

Multiple Cat killer Phillip Smith claimed "Getting rid of all the wild Cats would change the dynamics of the island".

14 June 2016 - Stewart Island Residents Back DOC's Plan To Get Rid Of 'Feral' Cats

<https://www.stuff.co.nz/environment/81014907/>

Eight months after 'conservationists' began engaging in the Feline holocaust on Rakiura/Stewart Island, Phillip Smith was proven correct. The ecological dynamics of the island had indeed changed, but not in the way intended. The following column written by experienced trampers details their experiences on the Rakiura track and elsewhere on the island. They stated they "found large rats were everywhere, not only around huts and campsites but on all parts of the tracks". DOC staff confirmed a much higher rat count than seen for many years. While two successive rimu mast years and inadequate 'pest' control are cited as the causes, we have no doubt the wholesale execution of the islands Cats is a more likely cause of the sudden increase in the rat population on Rakiura/Stewart Island.

21 February 2017 - Rats A Symptom Of Something Rotten In Protection Of Conservation Estate

<http://www.stuff.co.nz/environment/89658201/>

Documentation provided by HBRC claims it is "estimated that feral, stray and pet cats kill up to 100 million birds in New Zealand each year". Estimate is the key word here and HBRC provide zero evidence based scientific research to support this claim. The bottom line is this figure is likely a huge overestimate provided by private environmental extremist and antifelinist groups such as Morgan Foundation, Forest and Bird and Predator Free NZ. Well known animal advocate Bob Kerridge's recent opinion piece published in the NZ Herald covered the matter of 'research' designed to demonise Cats in the interest of furthering the primary aim of the antifelinists which is the total eradication of all Cats. 1 March 2018 - Campaign Against Cats Is Using Shonky Evidence  
[http://www.nzherald.co.nz/nz/news/article.cfm?c\\_id=1&objectid=12003469](http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12003469)

Many of the misconceptions of the alleged impact of Cats on 'native biodiversity' and the suggestions on what may be done about it provided by the environmental extremist movement have been thoroughly refuted by competent common sense ecologists such as wildlife ecologist John Innes of Landcare Research:

15 January 2015 - Cats Not NZs Main Culprit Killers

<http://www.stuff.co.nz/environment/8180514/>

22 January 2013 - Gareth Morgans Cats To Go Campaign Questioned

<http://www.newshub.co.nz/environmentsci/gareth-morgans-cats-to-go-campaign-questioned-2013012300>

Consultant ecologist Mark Bellingham, who at one point was North Island Conservation Manager for Forest and Bird stated: "at night cats are actually really good at getting rid of rats and mice. That's the bulk of what they take."

10 July 2017 - Cat control - Are Councils Too 'Wimpy' To Do It Themselves?

[http://www.nzherald.co.nz/nz/news/article.cfm?c\\_id=1&objectid=11888638](http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=11888638)

Feline Rights NZ encourages councils to support public education on good Cat care and one of the main aspects of this is encouraging citizens to de-sex their Cats. We support council subsidies for low income earners to have their Cats de-sexed. A de-sexed Cat is a happier healthier Cat. We encourage councils to support and provide funding for local Cat rescue organisations and those groups who serve Cat colonies. Well cared for Cat colonies are less likely to engage in predation on native wildlife and they will defend their territory and prevent the influx of further Cats. Engage in the removal of Cat colonies and one is confronted by what is known as the 'vacuum effect'. What this means is more Cats will move in to where the initial colony once was. We append a document by Alley Cat Allies which covers the matter of the 'vacuum effect'.

Predator Free NZ has run a template on their website for the purposes of collective lobbying where they suggests collapsing the legal categories of Cats and redefining both 'feral' and 'stray' Cats under a new arbitrary term 'pest Cats' these being all Cats who do not have a functional microchip which immediately returns an ID when scanned with a microchip scanner.

HBRC has no mandate to redefine 'stray' and 'feral' Cats as 'pest Cats', only central government can do that. HBRC has an obligation to follow the definitions of Cats as defined under the Animal Welfare Act 1999 and the associated

**The New Zealand Cat Foundation**

**Helping the Helpless**

**Companion Cats - Animal Welfare (Companion Cats) Code of Welfare 2007, a code of welfare issued under the Animal Welfare Act 1999.**

**Ministry of Primary Industries Companion Cats - Animal Welfare (Companion Cats) Code of Welfare 2007**

**<https://www.mpi.govt.nz/dmsdocument/1413-companion-cats-animal-welfare-code-of-welfare-2007>**

**The judiciary presiding over a judicial review would take a very dim view of a regional council acting outside of its mandate and using the arbitrary term 'pest Cat' in official council documentation and legislation to grant itself open season to execute every Cat it can catch. Go down the path of compulsory microchipping, use the microchip ID to determine who lives and who dies and social unrest is an inevitable consequence. The media will have a field day with it and it will not be a good look for either the council as an entity or the councillors themselves.**

**While microchips can be a useful tool in facilitating the return of lost Cats it is well documented that microchips are not infallible. The recent recall of some 15,000 microchips by the supplier Virbac NZ is but one example of microchips failing en masse. We append a copy of Virbac NZ's recall notification. As it is well documented that microchips do fail, if the council chooses to follow the suggestions of Predator Free NZ, it is only a matter of time before the council kills companion Cats and the council finds itself before the court for the mass execution of companion animals.**

**While the minds of some citizens are ensnared by pest-free mass hysteria and others citizens are engaged in emotively defending their companion animals, what we have is a divide and rule scenario. Undoubtedly there is other business going on behind the scenes the hidden wannabe rulers of society are hoping we will not notice. It's the standard methodology of the stage conjurer utilised on a mass scale.**

**When one sees business terminology such as "private-public partnership" and "management strategy", etc used in a political context, that is a sure sign of the evolution of corporate power into a dangerous political form.**

**The present focus on environmental action at all costs is not about genuine conservation as such. It's a business model, albeit a thoroughly flawed one. Restoration of 'native biodiversity' = more tourism = more revenue, and if it takes a series of pogroms against any and all exotic species including our beloved Feline family members then so be it.**

**A culture that does not grasp the essential interplay between power and true moral values, which mistakes management techniques for wisdom, and fails to understand that compassion and inclusiveness, not profit, is the measure of a civilization, condemns itself to death.**

Peter Manson

Hi Natalie and Mark

Thanks for the second chance.

Very briefly re pampas:

It should at least be on the organisms of interest list.

I and others consider it to be a biodiversity risk - mainly for wetlands. There are several examples in nhb where identifiable sources on private land are spreading seeds into wetlands. This is presently controllable.

The potential problem could occur anywhere from Tutira north and it would be wise for HBRC to provide information to ratepayers so they can recognise the plant as a risk and know how to control it. Ultimately I believe we need a recommended action plan for conservation site managers and adjacent land owners.

Thanks

Peter

Paddy Maloney

To Mark Mitchell  
Principal Biosecurity Advisor  
Hawkes Bay Regional Council.

**Re the HBRC review of its pest control programme.**

Mark,

Unfortunately I was not able to make a submission before the deadline, but given my recent observations while recently away in the Northland region, I think it is important to bring to your attention the serious problem that will develop if Argentina Pampas spreads in Hawkes Bay.

I would therefore like this letter to be accepted as a late submission to your consultation process.

I am aware of several places in the Hawkes Bay Region where we have smaller plots, but some other areas are already quite large plots of pampas.

I raised this issue with the Council a few years ago, but to date this plant has not been a priority for your Council's pest control strategy.

The worst local areas that I have seen for pampas are in northern Hawkes Bay in the Wairoa, Mahia, Nuhaka area where it is seriously out of control.

You may already be familiar with this issue there.

If you are not yet aware of it, then I recommend that you drive around the northern Hawkes Bay area to see how prevalent it is, and also how much effort will be required to eradicate it.

But if nothing is done it will only get worse.

There are lesser plots/outbreaks elsewhere in Hawkes Bay.

Some of these are in the Poukawa, Pekapeka/ Paki Paki area (there seems to be an effort to eradicate pampas in this area ), in the Clive area in Lawn road and Mill Road where there are hedges of pampas, out in the Waimarama district along Waimarama road, Tiakitai road, Te Apiti road, in Hastings itself alongside Highway 2 and the railway line on the south side of Hastings.

These smaller areas are more easily dealt with before they spread to a larger area.

When you are looking out for it, pampas seems to be quite common in our region, but is generally not yet out of control – except for the northern Wairoa/ Mahia area.

Now that I have drawn your attention to this you will now see it as very common.

My recent experience of the problem in the Northland region however made it very obvious what happens when this plant gets out on control.

I have attached several photographs from my recent experience in the Northland region which shown how extensive the problem is there.

It is most prevalent in cleared forestry areas and on poorly maintained farms, and along the roadsides.

The Northland area now covered in pampas would be several hundred, and more likely several thousand hectares of previously productive land.

The problem is now so large it will be impossible for the Northland Council to control and eradicate this plant.

The cost of eradication will now be well beyond the ability of the Northland council to finance, so for them, the problem will only get worse, and the economic loss will increase as time goes by.

The value of productive land now lost to pampas in Northland would now be many millions of \$ value.

This will be a permanent loss of previously valuable productive land.

The seed from this plant is easily spread by the wind, and it will thrive in Hawkes Bay. This is why it is important to nip this problem in the bud.

As with other pest and biosecurity problems it is much better to deal with this at the earliest possible stage, and if not controlled early the problem and the costs will become much greater if it is not dealt with.

I think it is important to add this pampas plant risk to the Council's control programme, and therefore seek that this letter be accepted as a late submission by Council.

Thank you,

Yours sincerely,  
Paddy Maloney  
P O Box 8106  
Havelock North.

## Hawkes Bay Regional Council

### Pest Management Strategy Review 2018

#### Submission on Plant Pests

I have viewed the current document and commend the Council on a well-structured document. However, throughout the Plant Pest section, no mention has been made of **Moth Plant – *araujia hortorum*** – a weed with origins from South America. I am aware that this weed is well established in parts of the Auckland region and is included in their Pest Management Strategy. It may be more widespread in other parts of New Zealand.

Over the past 4-5 years, Moth Plant has become evident and increasingly troublesome in the urban areas of Onekawa/Pirimai Napier) and may be more widespread than I have observed. My concern is how quickly the spread of this plant can occur and if this proliferation continues, this weed will quickly infect large areas.

My concerns are:

1. By not being mentioned in the Council's Regional Pest Management Strategy, the public will be unaware of this weed and as a consequence, could become widespread and devastating to productive rural land and public areas – possibly worse than Oldman's Beard!
2. The seeds are spread by the wind (up to 20k) and are a very prolific producer of seeds.
3. If the weed is currently contained there is an opportunity to manage further spread and then manage eradication.

I ask that the Council gives urgent consideration to the inclusion Moth Plant into the RPMS currently being considered in order that measures can be made and directed to some form of control for the long term benefit of regional economy. I am disappointed that this invasive weed lacks recognition in this and previous RPMS's

Mike Healy

March 2018



28 March 2018

By email

Mark Mitchell  
Principal Biosecurity Advisor  
Hawkes Bay Regional Council

Via email to: [Mark.Mitchell@hbrc.govt.nz](mailto:Mark.Mitchell@hbrc.govt.nz); [campbelleckie@hbrc.govt.nz](mailto:campbelleckie@hbrc.govt.nz)

Tēnā Koe Mark,

**Submission to support in part the proposed ‘*Hawkes Bay Regional Pest Management Plan*’**

- 1 Thank you for the opportunity to provide a submission on the proposed ‘*Hawkes Bay Regional Pest Management Plan*’ – *consultation document*. Please forward your formal response and any questions or require further information, please contact our Kaiwhakahaere Matua, Shayne Walker either on [swalker@tangoio.maori.nz](mailto:swalker@tangoio.maori.nz) or phone 027 361 6377.
- 2 The Maungaharuru-Tangitū Trust (Trust) is a post-settlement governance entity, established to hold and manage the Treaty settlement assets of the Hapū and to be the representative body of the Hapū. The settlement was given legislative effect under the Maungaharuru-Tangitū Hapū Claims Settlement Act in May 2014. The Trust represents the Hapū of Tangoio Marae including Ngāti Kurumōkihi (also known as Ngāi Tatarā), Ngāti Marangatūhetāua (also known as Ngāti Tū), Ngāi Te Ruruku ki Tangoio, Ngāti Whakaari, Ngāi Tauira and Ngāi Tahu.
- 3 The takiwā (traditional area) of the Hapū extends from the Maungaharuru range in the west of Hawke’s Bay, to Tangitū (the sea) in the east, and from Pōnui Stream (north of the Waikari River) in the north to Te Whanganui-ā-Orotu (the former Napier Inner Harbour) in the south.
- 4 The natural resources (including waters, rocks, reefs and aquatic life) within their seaward takiwā are taonga belonging to the Hapū. The importance of these taonga to the Hapū is demonstrated through:
  - the whakapapa, history and customary practices of the Hapū;
  - the establishment of the rohe moana and Moremore Mātaitai Reserve within their takiwā;
  - the full range of rights, interests and values of the Hapū;

**Maungaharuru-Tangitū Trust** 1st Floor, 15 Hardinge Road, Ahuriri, Napier 4110  
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- the appointment of the Trust as an advisory committee for the Wairoa Hard (marine area based restriction); and
  - their application under the Marine and Coastal (Takutai Moana) Act for a Protected Customary Rights Order and a Customary Marine Title.
- 5 In addition, there is a wealth of evidence about the association of the Hapū to their taonga, including that set out in various statements of association in their Deed of Settlement as attached to the Maungaharuru-Tangitū Hapū Claims Settlement Act 2014.
- 6 Given the importance of the Maunga, the Waterways, Tributaries, Ngahere, Wāhi Taonga, Rivers the Lakes and seaward takiwā and responsibilities of the Hapū as kaitiaki we make the following submission.

### **Hawkes Bay Regional Pest Management Plan - Summary**

The *Hawkes Bay Regional Pest Management Plan* consultation document suggests a range of proposals that impact and effect Maungaharuru-Tangitū Trust. We have summarized our position to each relevant section where we seek clarification and change to recognize and provide for our cultural values. We also recommend and invite a process of engaging with Maungaharuru-Tangitū Tangata Whenua in order to recognize and provide for our special relationships with our Taonga and avoiding and minimizing effects on our cultural values.

Two key themes have emerged from our analysis of the draft plan:

1. Appropriate representation and engagement with Maungaharuru-Tangitū Tangata Whenua as opposed to someone who is Māori. Specifically as a Treaty Partner, HBRC are obligated to engage directly with Maungaharuru-Tangitū Tangata Whenua. Maungaharuru-Tangitū Tangata Whenua are not currently represented in the HBRC Māori Committee and the Regional Planning Committee decisions are not binding on Maungaharuru-Tangitū Trust. Specific and direct engagement is encouraged.
2. How will the plan address the affects of pests on our cultural values? This is not clear, the effects are not clear and therefore the remedies or actions are not clear eg, Kaitiakitanga, Wāhi Taonga, Wai Māori and Rongoā.

#### **2.1 Strategic Background**

- The proposer paragraph does not state your regulatory obligations with reagrd to bio security and pest management. This could be alluded to at this earliest point as opposed to later in the plan.
- Does not state your obligation to Tangata Whenua in making decisions. This is further reflected in figure 2.
- Can you please highlight how pest management impacts ‘cultural values’ when considering the strategic background to the strategy and how the HBRC and this plan intends to avoid such impacts.

- How do the complementary plans complement the strategy, what plans are these? Can you add a thematic scheme to contextualize.

#### 2.1.1

- Do Tangata Whenua not feature in the partnership?
- The framework contradicts earlier paragraphs aforementioned where Tangata Whenua are not considered part of the partnership. It is important that this is recognised throughout the plan.

#### 2.1.2

- How does the framework and the HBRC intend to protect 'cultural values' of Maungaharuru-Tangitū from pest threats?
- Figure 4 again fails to recognise and provide for Tangata Whenua as per the RMA.

## 2.2 Legislative Background

### 2.2.1 Bio Securities Act

- Part 5; How will the plan enable, recognise and provide Maungaharuru-Tangitū, our Kaitiakitanga and our Taonga? Can you please state the actions that are intended to achieve this.

### 2.2.2 Resource Management Act

- The plan fails to recognise the specific Parts of the Act where the HBRC is obligated to provide and recognise for Tangata Whenua values, namely Maungahauru-Tangitū Trust.

### 2.2.3 Local Government Act

- This is the Act on which the HBRC is based and perhaps could be the leading paragraph regarding legislative background paragraph.
- This Act also places obligations on the HBRC to enable participation of Tangata Whenua in decision making. How will the HBRC enable MTT to do so? To date, this has been poor, the Maori Committee does not represent the interest of MTT and the Regional Planning Committee decisions are not binding on MTT. HBRC are obligated to ensure that they specifically engage with MTT.

### General Legislation

- The responsibilities and obligations of HBRC are not clearly articulated. Where is the accountability for the Council?

### 2.3.6 – Te Mana Whakahono

- Consideration needs to be given either in this section or one earlier for the plans of Hapū as established in the review of the RMA.

## 2.5 Relationship with Māori

- The sentence stating that TW carry out significant pest management due to our primary sector economic interests is limiting. Our interests are broader than primary sector and economic and are primarily based on our cultural values as a priority over primary sector and economic.

### Māori Committee

- The statements here are incorrect in that this committee does not represent Maungaharuru-Tangitū Tangata Whenua therefore does not meet the Council's obligations under the Treaty and other respective Acts. This statement needs to be rectified.

## 2.6 Consultation Overview

- Direct consultation has not occurred with Maungaharuru-Tangitū Trust. As a Treaty Partner, the expectation is that HBRC will engage directly on all matters and enable such participation as per the respective Acts aforementioned.

### 3.3.3 – Post Settlement governance Entities

- A paragraph stating the role that PSGE entities have could be placed here and move the Territory authorities to 3.3.4. This should include consideration to the Legislative Acts of each settlement, the Statements of Association and Wahi Taonga.

## 3.3, Funding

Funding consideration should be given to the Tangata Whenua engagement and action in the plan.

## 3.4 Iwi, Hapū relationships

- Maungaharuru-Tangitū support the increased participation of Iwi and Hapū in the plan. The onus is on HBRC to ensure that you are engaging, consulting with the appropriate mandated Tangata Whenua, not any Māori.
- Maungaharuru-Tangitū support the inclusion of a policy to ensure that engagement is undertaken from the **OUTSET** of considered pest management in the takiwā of MTT.
- Enabling Maungaharuru-Tangitū Tangata Whenua to participate in pest control and management decisions and management. This is an example of Maungaharuru-Tangitū Tangata Whenua enacting kaitiakitanga in the form of governance, management and pest control.
- It will be beneficial for the HBRC to understand the aspirations of Maungaharuru-Tangitū Tangata Whenua with regard to pest management. This may be achieved through some dual planning and operations within our Takiwā.

Nāku noa, nā

Shayne Walker  
Kaiwhakahaere Matua - General Manager  
**Maungaharuru-Tangitū Trust**  
swalker@tangoio.maori.nz  
027 361 6377

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Mike Lusk

I note that purple ragwort, *Senecio elegant* is included in the list of plants which may become a problem. I wonder if in fact you mean to have pink ragwort, *S. Glastifolius* in the list instead. It is certainly becoming a problem in some parts of Hawkes Bay, growing well in dunes and very dry areas such as cliffs.

I believe that *Echium vulgare* and *E. plantagineum* will also become a widespread and problematic weeds locally-indeed one or other or both are becoming very visible along rural roadsides. There is now active one of the biological controls introduced to Australia many years ago (a leaf mining moth) and there is some damage showing upon plants on Te Mata Peak and in my garden.

Regards,

Mike Lusk

Pete Shaw

Comment:

Currently there are private owners of large tracts of native forest within the hinterland of Hawke's Bay that are wanting to implement pest control plans that would reduce possum numbers down to very low numbers. These properties are bounded by large tracts of Maori land, some of which have been managed pro-actively and have shown great resolve in reducing possum numbers to low levels. Tatarakina is an exception. Despite coming under a Nga Whenua Rahui Covenant, requiring pest control, the owners have resisted broadscale possum control. This is both a ticking time-bomb for adjoining landowners and also a huge compromise to any possum control for any adjoining lanowners.:

Proposal: That HBRC take a lead role in enforcing the good neighbour rule in terms of possum control, with an EMPHASIS upon large tracts of land bordered by properties which are proactive in possum control.

Pete Shaw

Manager of Pohokura and Maungataniwha

16 April 2018

To: Regional Pest Management Plan Hearing Panel

**Submission on Hawke's Bay Proposed Regional Pest Management Plan 2018-38**

Yellow Bristle Grass - page 32: Part 6.1.6 Exclusion

Yellow bristle grass is an aggressive annual plant that spreads through pasture, reducing pasture quality in late summer and autumn. It primarily impacts milk and stock finishing producers. It is difficult to identify when not seeding as it is very similar in appearance to other bristle grasses present in New Zealand. It is currently widespread throughout Taranaki, Waikato, South Auckland and Bay of Plenty. Control tools are limited, as herbicides also negatively impact desired pastures. It is currently designated as an exclusion pest in Hawke's Bay Regional Pest Management Plan. The objective of this programme (pg 33) is to exclude the establishment of yellow bristle grass within the land of the Hawke's Bay region in order to protect the region's economic well-being. For this objective to be met, yellow bristle grass cannot currently be established in the Hawke's Bay region.

Unfortunately staff recently discovered a population of yellow bristle grass in northern Hawkes Bay, primarily growing along roadside margins. It was confirmed as yellow bristle grass by the Plant Identification Service at Landcare Research on 27 March 2018. HBRC Pest Plant staff are currently undertaking a roadside delimitation survey with the current known distribution shown in map 1 below. Approximately 90% of this roadside delimitation area has been surveyed.



Map one – blue lines indicate current known infestation of yellow bristle grass

Yellow bristle grass has multiple vectors, primarily being mowers, machinery and stock. Its seeds can survive passage through the rumen and be deposited and establish in dung. It appears the main vector for the spread of the population of yellow bristle grass in northern Hawke's Bay is roadside mowers. Although the source of this incursion is unknown, yellow bristle grass is known to be present in the Gisborne Region. HBRC Pest Plant staff are in conversations with Wairoa District Council, New Zealand Transport Authority and private land owners to manage current risk pathways, primarily focusing on roadside mowers and machinery. Staff are also preparing an information package that will go out to adjacent land owners of known yellow bristle grass populations. It will contain information on its impact, biosecurity measures to mitigate spreading the pest, and options for control. Staff will continue to undertake delimitation surveys and design an annual awareness campaign to run during the high risk seeding period (December – March).

Given the current extent, number of potential vectors and limited control tools, staff believe eradication is not achievable. Eradication has not been attempted in any other region to date.

However, powers under the Biosecurity Act are still required to manage this pest, particularly for vector management. It is proposed that yellow bristle grass is moved to Sustained Control with council's main focus being on preventing its spread and assisting the community in best practice management.

### **Recommendation**

Move yellow bristle grass from Eradication to **Sustained Control**

Thank you

Darin Underhill

Biosecurity Team Leader – Plant Pest

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