

Environmental Strategy and Planning Committee

Meeting will be held in the Council Chamber, Level 2, Philip Laing House,
144 Rattray Street, Dunedin



This meeting will be livestreamed to the [ORC Official YouTube Channel](#)

Members:

Cr Lloyd McCall (Co-Chair)
Mr Edward Ellison (Co-Chair)
Ms Karen Coutts
Cr Alexa Forbes
Cr Gary Kelliher
Cr Michael Laws
Cr Kevin Malcolm
Cr Tim Mephram
Cr Andrew Noone
Cr Gretchen Robertson
Cr Alan Somerville
Cr Elliot Weir
Cr Kate Wilson

Senior Officer: Richard Saunders, Chief Executive

Meeting Support: Cara Jordan, Governance Support Officer

22 May 2025 01:00 PM

Agenda Topic

Page

1. WELCOME

2. APOLOGIES

No apologies received at time of publication.

3. PUBLIC FORUM

At the time of publishing no requests to speak had been received.

4. CONFIRMATION OF AGENDA

Note: Any additions must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

5. DECLARATION OF INTERESTS

Members are reminded of the need to stand aside from decision-making when a conflict arises between their role as an elected representative and any private or other external interest they might have. [The Register of Councillors Pecuniary Interests](#) are published on the ORC website.

6. PRESENTATIONS

At the time of printing no requests to present had been received.

7. CONFIRMATION OF MINUTES 3

That the minutes of the Environmental Science and Policy Meeting of 20 February 2025 be confirmed as a true and accurate record.

7.1 [Minutes of Environmental Science and Policy Committee](#) 3

8. [OPEN ACTIONS FROM THE RESOLUTIONS OF THE COMMITTEE](#) 6

9. MATTERS FOR CONSIDERATION 7

9.1 [Regional Pest Management Plan Review](#) 7

The purpose of this paper is to update the Committee on progress to review the Otago Regional Pest Management Plan 2019 – 2029 (RPMP) and seek endorsement of the 'RPMP Review Project Plan'.

9.1.1 [Regional Pest Management Plan Review Project Plan April 2025](#) 15

9.1.2 [Regional Pest Management Plan Review Options Paper \(4 December 2024\)](#) 33

9.2 [Rabbit Issues in Public/Crown Land](#) 40

The purpose of this paper is to provide information regarding complications faced by private land occupiers undertaking rabbit management on land bordering Public/Crown land.

10. CLOSURE



**Environmental Science and Policy Committee
MINUTES**

**Minutes of an ordinary meeting of the Environmental Policy and Science Committee
held in the Council Chamber, Level 2 Philip Laing House, 144 Rattray Street, Dunedin
on Thursday 20 February 2025, commencing at 11:00 AM.**

PRESENT

Cr Lloyd McCall	<i>(Chair)</i>
Karen Coutts	
Cr Alexa Forbes	
Cr Gary Kelliher	
Cr Michael Laws	
Cr Kevin Malcolm	
Cr Tim Mephram	
Cr Andrew Noone	
Cr Gretchen Robertson	
Cr Alan Somerville	
Cr Elliot Weir	
Cr Kate Wilson	

1. WELCOME

Chair McCall welcomed Councillors, members of the public and staff to the meeting at 11 am. Staff present included Richard Saunders (Chief Executive), Anita Dawe (GM Regional Planning and Transport), Nick Donnelly (GM Finance), Tom Dyer (GM Manager Science and Resilience), Joanna Gilroy (GM Environmental Delivery), Tami Sargeant (GM People and Corporate), Amanda Vercoe (GM Strategy and Customer, Deputy CE), Kylie Darragh (Governance Support).

2. APOLOGIES

Resolution: Cr Forbes Moved, Cr Weir Seconded:

That the apologies for Edward Ellison be accepted.

MOTION CARRIED

3. PUBLIC FORUM

No requests to address the Committee under Public Forum were received.

4. CONFIRMATION OF AGENDA

The agenda was confirmed as published.

5. DECLARATIONS OF INTERESTS

No changes to Councillor Declarations of Interests were noted.

6. PRESENTATIONS

No presentations were held.

7. CONFIRMATION OF MINUTES

Resolution: Cr Malcolm Moved, Cr Somerville Seconded

That the minutes of the (public portion of the) Council meeting held on 6 November 2024 be received and confirmed as a true and accurate record.

MOTION CARRIED

8. OPEN ACTIONS FROM RESOLUTIONS OF THE COMMITTEE

No updates were noted to the Action register for this committee.

9. MATTERS FOR CONSIDERATION

9.1. Groundwater Hydrology in the Critically Endangered Native Galaxiid Habitat, Kauru River, North Otago

[YouTube 2:41] This paper summarised findings of a study to understand the relationship between river flows and groundwater behaviour in the lower reach of the Kauru River, Kakanui catchment, North Otago. This section of river provides a habitat to the critically endangered lowland long jaw galaxiid. Ben MacKay (Manager Science) Jason Augspurger (Principal Scientist) and Pete Ravenscroft (Team Leader Biodiversity) were present to respond to questions.

Resolution ESP25-101: Cr Malcolm Moved, Cr Wilson Seconded

That the Committee

1. Notes this report.

MOTION CARRIED

Cr Laws left the meeting at 11:50 am.

Cr Laws returned to the meeting at 11:59 am.

9.2. Update on the Groundwater Science Programme

[Youtube 43:23] This paper updated the Committee on the groundwater science programme. This included recent expansions and improvements to the monitoring network, the transition to an online national wells database, technical contributions to the proposed Land and Water Regional Plan, and ongoing efforts to better understand and manage Otago's groundwater resource. Ben MacKay (Manager Science), Amir Levy (Senior Groundwater Scientist) were available to respond to questions.

Resolution ESP25-102: Cr McCall Moved, Cr Weir Seconded

That the Committee:

- 1. Notes this report.**

MOTION CARRIED

12. CLOSURE

There was no further business and Chair McCall declared the meeting closed at 12noon.

Chairperson

Date

Environmental Strategy and Planning Committee - OPEN ACTIONS FROM THE RESOLUTIONS OF THE COMMITTEE

Meeting Date	Document	Item	Status	Action Required	Assignee/s	Action Taken	Due Date
4-12-2024	Environmental Science and Policy Committee - 4 December 2024	GOV2465 Deep Lakes Technical Advisory Group update	Assigned	ESP24-116 Requests an updated report be prepared for the Committee for mid-2025.	Scientist - Lakes, Team Leader - Land, Water Quality Scientist		30-06-2025

9.1. Regional Pest Management Plan review

Prepared for: Environmental Strategy and Planning Committee
Report No. GOV2529
Activity: Governance Report
Author: Michelle Ewans, Biosecurity Specialist – Terrestrial; Libby Caldwell, Manager Environmental Implementation
Endorsed by: Joanna Gilroy, General Manager Environmental Delivery
Date: 22 May 2025

PURPOSE

- [1] To update the Committee on progress to review the Otago Regional Pest Management Plan 2019 – 2029 (RPMP) and seek endorsement of the 'RPMP Review Project Plan'.

EXECUTIVE SUMMARY

- [2] The RPMP is a statutory requirement under the Biosecurity Act 1993 (the Act). Otago Regional Council (ORC) is the 'deemed management agency' to implement Otago's RPMP under the Act. Council's current RPMP has a duration of 2019-2029.
- [3] On 4 December 2024, Council approved a full review of the RPMP to be completed by 2027. Project specific resources have been allocated, and the planning process is underway. To achieve this a project plan has been developed (attachment 1) this extends the delivery date for the refreshed RPMP from the end of 2027 until 1 July 2028.
- [4] In preparing the project plan, staff have worked with Environment Canterbury (ECan) and Environment Southland (ES) to identify ways neighbouring Councils could align, through their respective RPMP reviews. The objective in alignment is to progress and grow a collective biosecurity management programme that will improve pest management outcomes within, and across, regional boundaries. To ensure time for alignment the project timeline has been extended by 6 months. It will also provide additional time to ensure alignment with any changes to the Biosecurity Act.
- [5] ORC staff recommend Councillors establish a Councillor Reference Group to oversee the process of developing the RPMP. The team working on the review (the 'Project Team') would work with this Councillor Reference Group to provide updates on progress and ensure information provided to Council is tailored to support efficient decision making, thereby maximising the value of full Council meetings and workshops.

RECOMMENDATION

That the Committee:

- 1) **Notes** this report.
- 2) **Recommends that the Council endorse the Regional Pest Management Plan Review Project Plan as submitted (Attachment 1) (Option 1).**

- 3) **Endorses** staff progressing conversations with staff at Environment Canterbury and Environment Southland to explore an opportunity to develop a cross-region pest management plan (Option 1).
- 4) **Endorses** the establishment of a Councillor Reference Group to oversee the development of the renewed Regional Pest Management Plan Review (Option 1).
- 5) **Nominates** two councillors and one alternate to be members of the proposed Councillor Reference Group (if endorsed).

BACKGROUND

- [6] The Biosecurity Act 1993 is the national legislation that sets out how Central Government and Regional Councils deal with pests and unwanted organisms in New Zealand. It enables Regional Councils to develop Regional Pest Management Plans (RPMP) to control and manage pests in their region by setting objectives and rules. The current RPMP was established by Council resolution on 25 September 2019, with a duration of 2019-2029.
- [7] On 4 December 2024, staff presented a range of options to the Environmental Science and Policy Committee on the potential review of Otago's RPMP. Staff recommended a full review of the RPMP be undertaken prior to the current 10-year timeframe of 2029. Council approved a full review of the RPMP by the end of 2027, noting that the timing of the recommended option may be dependent on when the current Biosecurity Act is amended by Parliament.
- [8] While the review of the plan is being worked on, new pests would need to be added via a partial review. If a partial review was to be undertaken now, a full review will still be required by 2029, and so the RPMP would essentially undergo the review process twice. Commencing the review now provides an adequate timeline and room for alignment. Support for groups working in the biosecurity space can still happen now while the full review is happening and help to address any issues with emerging pests.
- [9] An additional recommendation was made for staff to be required to correct inconsistencies and errors within the existing RPMP through the minor changes process outlined under the Act. This action has since been completed by staff.
- [10] The RPMP Review Project Plan (Attachment 1) has been developed to provide a high-level summary of the process, phasing, milestones, and key delivery activities that will allow a plan to be drafted. It clearly sets out the legislative process for an RPMP review and describes the steps Council will take to ensure we meet the steps in that process. The document outlines the governance and project management structure of the project and explains the need for a Councillor Reference Group and why that oversight is critical to the success of the project delivery. The project plan also outlines a range of alignment opportunities for the review.
- [11] To ensure Council remains fully informed an update of review objectives and progress is proposed to be provided to in November 2025. Additionally, a full Council workshop is proposed in 2026 to ensure Councillors have an opportunity to discuss in detail the direction and opportunities for a refreshed RPMP.

- [12] Regular reporting on progress towards achieving the project plan timelines will be reported to the Committee and a paper will come in the near future with detail to recommend the set-up of a Councillor Reference Group.

DISCUSSION

RPMP Review Progress Update [Feb 2025 – May 2025]

- [13] The RPMP review is being led by the Environmental Implementation Team. A Project Team has been established and a regular meeting schedule implemented. The Project Teams primary activity has been development of the project plan (Attachment 1). A template for written monthly updates is the next activity to be completed. The Project Team is supported by key individuals from across the organisation including (but not limited to) legal, strategy, procurement, policy and planning, science, communications, engagement and geospatial information.
- [14] A 'Bottom of the South' RPMP staff Working Group with key staff from ORC, ECan and ES has been formed. Monthly meetings have been agreed, and an online information-sharing platform will be established. Opportunities to collaborate, share and create efficiencies will be explored and implemented where practicable.
- [15] An 'Engagement & Communications Plan' is currently in development, and processes will be designed to ensure that consultation outcomes from the plan clearly align with the consultation requirements of the Act.

Change to project timeline

- [16] To provide alignment with the RPMP review work of adjoining Councils, it is recommended that the project end-date is moved by 6 months. The 2025/26 year will be dedicated to developing and implementing cross-council engagement, facilitation of shared processes and identifying and implementing efficiencies within and across respective reviews. The end date for an operative RPMP will move from December 2027 to July 2028 at the latest. The benefits and risks of the additional 6 months are outlined below. Adding in time now, gives the best chance of alignment and cost sharing.
- [17] While the review is being undertaken, biosecurity related pest management will continue as normal. The objectives in the current RPMP will align with the Biosecurity Operational Plan 2025/26 (to be approved by Council in June 2025) and all rules under the RPMP will continue to apply. This will continue until the point where the new plan becomes operative (1 July 2028).
- [18] It is recognised that the community is interested in new rules and approaches for existing pests and to explore options for managing plants and animals that are not currently in the RPMP. Whilst the RPMP review work is underway it is proposed that new and existing pests and people/groups that are interested in managing them are supported by:
- a. Support of groups through Catchment Advisor work programmes and Community Co-ordinator team members. This would mean that any new group wanting to form to work towards managing pests would be facilitated and supported. For example, this would be used to engage with forestry companies and communities about pest management.

- b. Supporting the development of new site led areas, if the sites meet the criteria in the Biosecurity Strategy and under the Biosecurity Act.
- c. Looking at how the proposed Large Scale Environmental Fund and ECO Fund can be used to support groups who want to work to control or manage biosecurity.
- d. Supporting the development of biosecurity plans or strategies through Catchment Action Plans.
- e. Increased focus on inspections and implementation of the Compliance Policy, which includes an education first approach but supports the use of the right compliance tool at the right time.

[19] The above are all within the education and relationship building aspect of regulatory work and can all be achieved as the plan is being developed, so people are supported for any new regulatory framework.

Alignment with other Councils

[20] Extending the front-end of the timeline will enable Council to deliver a RPMP proposal that will complement those produced by neighbouring Councils and to give effect to any changes made to the Biosecurity Act. It allows the RPMP Working Group to explore cross-boundary biosecurity concerns and collectively problem-solve emerging pest management issues. Timeframes for completion of key steps will still be in advance of other Councils but will now enable an in-depth planning process prior to key stakeholder engagement.

[21] Opportunities and risks of providing the additional time, as it relates to alignment with neighbouring Council are as follows:

Opportunity	
1	Financial and time savings through the shared use of external consultants (if needed) across the three Councils. Internal resources will always be used first, but there are clear cost saving benefits of alignment if external resources are shared.
2	Financial and time savings through collaborative approaches to the development of key proposal documents. For example, there could be considerable time and cost efficiency if the RPMP Working Group were able to combine the basis of the economic cost-benefit analysis (CBA) into one document, for use within each Council review, rather than the usual three documents. The CBA makes up a component of the proposal to prepare a plan under the Biosecurity Act 1993.
3	Financial and time savings from a collaborative high-level engagement approach could also be realised. If the RPMP Working Group can engage with key stakeholders in a single setting, the efficiency of this process could be significantly increased.
4	Higher quality review outcomes are likely to be achieved through a collaborative approach to engagement. Key stakeholders can work through the engagement process with representatives from all three Councils, enabling cross-boundary issue identification and problem solving.
5	Higher quality review outcomes are likely to be achieved through undertaking collaborative high-level mana whenua consultation processes. This will ensure cross-boundary interests are identified and included in engagement processes.

6	Long-term higher quality outcomes are likely to be achieved through regional alignment of plan objectives and rules, where relevant species allow. This will ensure that pest species on boundaries, or within identified pathways, are subject to the same rules and requirements.
7	Long-term higher quality review outcomes are likely to be achieved through strengthening understanding of, and methods relating to, biosecurity management and how a collective approach can improve outcomes.
8	Time efficiencies will be realised where Councils are provided a pathway for resource, skill and expertise sharing. A collaborative approach will also support the timely capture of inconsistencies in information, shared problem solving and document review from a collaborative team with a wide range of backgrounds and experience across the three Councils.
9	Taking time for alignment with neighbouring councils will ensure community concerns about RPMP content (e.g., some pests or sites not being in the RPMP, consistency of rules) are addressed in an integrated and well considered manner.
Risk	
1	Community concerns about RPMP content (e.g., some pests or sites not being in the RPMP, consistency of rules) are not addressed as quickly as they would be with the original timeline.
2	Locally focused engagement processes may not effectively target cross-boundary issues and could result in conflicting plan outcomes.
3	Not making use of neighbouring Council resources to support plan development creating inefficiencies. Likely reinvention of existing process by ORC. Risk of missing key steps through inexperience or lack of lead in time.
4	Increased consultant costs where individual Councils secure local resource. Inconsistent or differing advice across Councils.
5	Reliance on local focus to develop plans may see inconsistent or differing objectives and rules across neighbouring plans. This lack of understanding will lead to objectives and rules that may struggle to support shared pathway management and response. This could impact negatively on local effectiveness for exclusion pest species.

- [22] Opportunities and risks to not of providing the additional time, as it relates to alignment with neighbouring Council are as follows:

Opportunity	
1	RPMP review completed, and new plan operative, by 1 December 2027.
2	Brings forward addressing the existing issues in the current RPMP and the consideration of potential pests as soon as practical.
Risk	
1	Reduced level of alignment with neighbouring Councils, leading to updated plans that lack connectiveness and cohesion.
2	Locally focused engagement processes may not effectively target cross-boundary issues and could result in conflicting plan outcomes.
3	Not utilizing neighbouring Council resources to support plan development could create inefficiencies. Likely reinvention of existing process. Risk of missing key steps through inexperience or lack of lead in time.

4	Increased consultant costs where individual Councils secure local resource. Inconsistent or differing advice.
5	Reliance on local focus to develop plans may see inconsistent or differing objectives and rules across neighbouring plans. This lack of understanding will lead to objectives and rules that may struggle to support shared pathway management and response. This could impact negatively on local effectiveness for exclusion pest species.

Joint pest management plan

- [23] There is an opportunity to explore with ES and ECan staff whether a cross-region pest management plan is desirable. Section 17A of the Local Government Act 2002 supports exploring this opportunity to see how Council might be able to streamline the delivery of the (future) RPMP and meet the needs of the communities within Otago to ensure we provide cost effective services. This has not yet been discussed in detail with these Councils. ORC staff seek endorsement from Council to explore this opportunity and once it is discussed and bring this back to Council. Longer term, there is an opportunity under Section 17A of the Local Government Act 2002 to explore joint committee or other shared governance arrangements too.

Establishing a Councillor Reference Group

- [24] The Project Team recommends Councillors establish a Councillor Reference Group to assist staff to progress the RPMP review. This group would operate like both the Climate Reference Group and the Air Quality Reference Group. Both groups had an oversight role in their respective programmes. The councillors nominated to be on this Reference Group, will work with staff to decide on membership, the terms of reference and purpose of the Group.
- [25] The Project Team anticipate that the RPMP Review Project Team would seek input from the Reference Group at no more than monthly intervals between July 2025 and November 2027.

Additional considerations for project timeline

- [26] A review of the Biosecurity Act 1993 is currently underway. This be being led by the Ministry for Primary Industries and Council staff are involved in conversations on this through Te Uru Kahika. The purpose of the review is to update and modernise the Act. The call for submissions closed on 13 December 2024 and a summary of submissions was released on 20 March 2025. Council made a submission (dated 13 December 2024). Final policy recommendations are slated to go to the Minister for Biosecurity later this year.
- [27] The ORC Indigenous Biodiversity Strategy is currently under review; this review will incorporate the existing Biosecurity strategy. This project is being managed by the Strategy Team, with a timeline like the RPMP review Project Plan. The Environmental Implementation and Strategy Teams are working closely together on both projects. Council will be seeking public feedback on the draft indigenous biodiversity strategy in August 2025. Feedback from the Biosecurity Team has been sought on how best to align the new strategy with the RPMP. The 'biosecurity' component of the strategy will focus on providing high-level strategic direction, while the RPMP will build on that direction through the alignment of objectives and rules.

- [28] A review into the effectiveness of the Otago RPMP is in its final stages. Outcomes of this review will be presented to the Environmental Implementation Committee in June 2025. The effectiveness review has a key focus on how successful ORC have been in delivery of the current RPMP. Incorporating recommendations and lessons learned from this review, into the RPMP review will ensure identified improvements are formally captured.

OPTIONS

- [29] Option 1 (recommended): **Endorse** the RPMP Review Project Plan (as attached); **endorse** the establishment of a Councillor Reference Group, **nominate** councillors to be members of this group and **endorse** staff progressing conversations with staff at Environment Canterbury and Environment Southland to explore an opportunity to develop a cross-region pest management plan
- [30] Option 2: **Reject** the RPMP Review Project Plan as attached and provide a request that staff re-work the project plan to an alternative date (to be determined in the Committee meeting).

CONSIDERATIONS

Strategic Framework and Policy Considerations

- [31] The ORC Biosecurity Strategy is being revised. This process will allow for better alignment with the RPMP.

Financial Considerations

- [32] A budget of \$1.6m of funding has been allocated in the 2028/29 Long Term Plan budget to undertake a full review of the current RPMP. The full amount of funding allocated in the 2028/29 (Year 5) budget will need to be brought forward and allocated across the 2026/27 (Year 3) and 2027/28 (Year 4) financial years.

Significance and Engagement

- [33] The RPMP Review is likely to generate a high-level of public interest. A detailed Engagement Plan and Communications Plan is in development.

Legislative and Risk Considerations

- [34] The main legislative consideration is the planned amendment to the Biosecurity Act (as per Section 22(a) above).

Climate Change Considerations

- [35] No direct considerations related to climate change. Any climate change effects will be addressed in the cost-benefit analysis for individual pest species.

Communications Considerations

- [36] An Engagement and Communications Plan specific to the RPMP review is in development.

NEXT STEPS

- [37] Should the Project Plan 2025-2028 be endorsed, the key stakeholder engagement process will commence from 1 July 2026.

ATTACHMENTS

1. Regional Pest Management Plan Review Project Plan April 2025 [9.1.1 - 18 pages]
2. Regional Pest Management Plan Review Options Paper (4 December 2024) [9.1.2 - 7 pages]



Project Plan: Review of the Otago Regional Pest Management Plan 2019-2029

1 July 2025 – 30 June 2028

Version:	V1
Date:	April 2025
Author:	Biosecurity Specialist - Terrestrial
Owner:	Otago Regional Council
Reviewed By:	Team Leader Biosecurity
Project Lead:	Manager Environmental Implementation
Project Coordinator:	Biosecurity Specialist – Terrestrial

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1. Introduction

1.1 Purpose

The purpose of this project plan is to provide an overview of the process that will be undertaken to deliver the review of the Otago Regional Pest Management Plan 2019-2029 (RPMP) as required by the Biosecurity Act 1993 [Sections 68 – 78]. This plan identifies key milestones, objectives and deliverables and provides a timeframe for completion. Critical risks to the project are identified and risk mitigations proposed. The outcomes of this review will inform the development of the new Otago Regional Pest Management Plan 2028 – 2038.

1.2 Background

The council's current RPMP was established by Council resolution on 25th September 2019, with a duration of 2019-2029. A full review of the RPMP is required every 10 years as per the Biosecurity Act 1993, Section 100D (1) (c), however, a review can be brought forward. Options for a review of the RPMP were presented to the Environmental Science and Policy Committee in a paper titled 'Regional Pest Management Review Options' on 4 December 2024. After consideration by the Otago Regional Council (ORC) a full and early review of the current RPMP was recommended.

1.3 Scope

This project plan covers the high-level requirements to deliver the RPMP review only. Details on required activities will be covered in individual activity-specific plans (e.g., engagement will have a separate, aligned planning document). While this plan does touch on other external considerations (for information purposes) detailed analysis of impacts or outcomes from those considerations will be documented separately.

1.4 Objectives

The key objective of the review is to address inconsistencies within the current RPMP, resolve implementation challenges and provide a refreshed, updated and current approach to pest management across the Otago region.

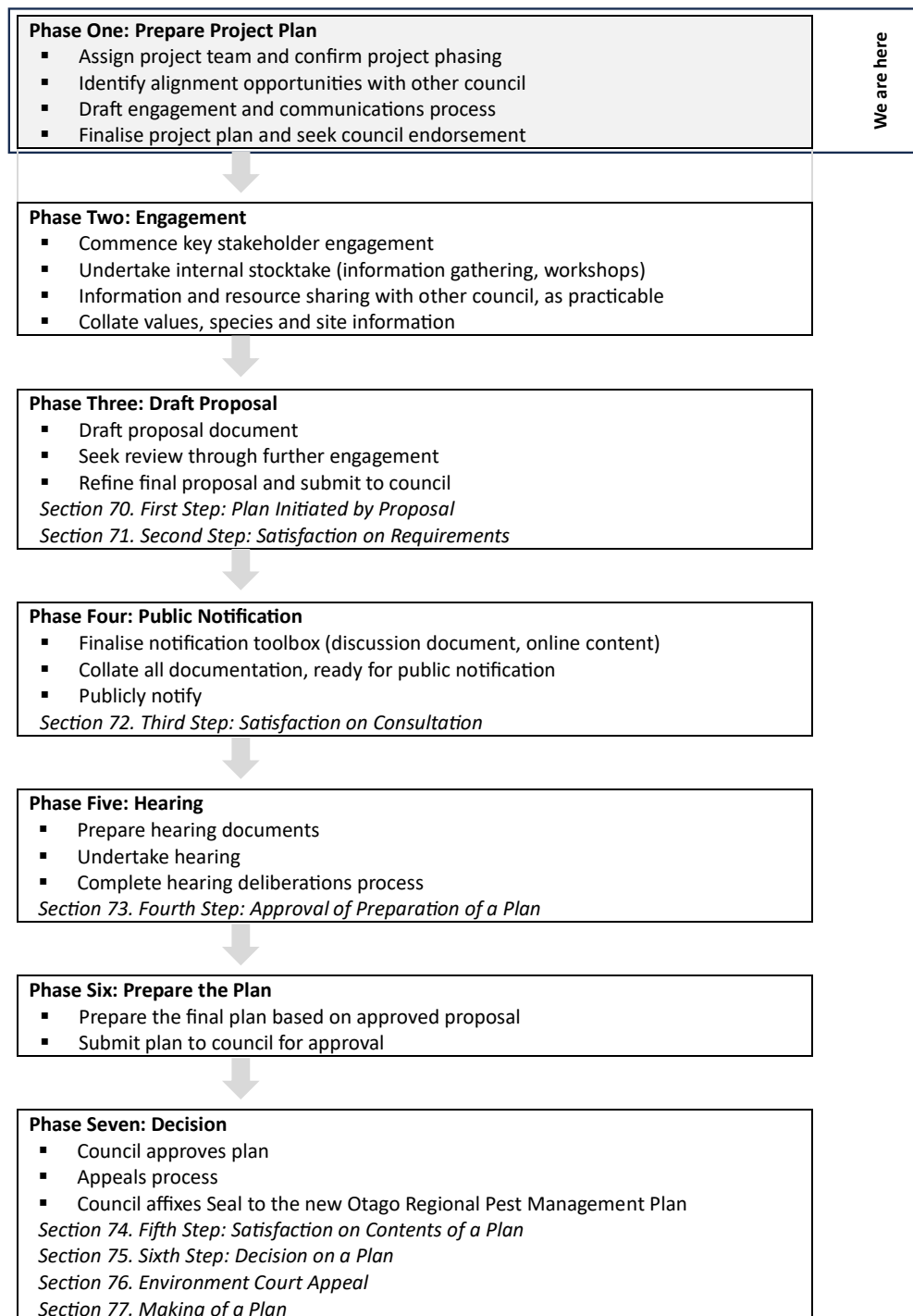
1.5 Relevant Legislation & Regulation

The Biosecurity Act 1993 is the national legislation that sets out how central government and regional councils deal with pests and unwanted organisms in New Zealand. It enables regional councils to develop regional pest management plans to control and manage pests in their region by setting objectives and rules (see Appendix 1 for detail). Pursuant to section 57(7) of the Act the making of a national policy direction is required. The National Policy Direction for Pest Management 2015 ensures that all plans developed under the Act by a regional council (or other national pest management agency) *'provide the best use of available resources for New Zealand's best interests and align with one another, when necessary'*.

1.6 Stakeholder Engagement

The Biosecurity Act 1993 [Section 72; Part (1)] describes statutory engagement requirements. This review will be conducted in collaboration with relevant ORC personnel, mana whenua, regional territorial authorities and external stakeholders. Alignment with neighbouring council reviews will occur where possible. An Engagement Plan is in development.

2. Project Method



3. Project Phasing

Phase One: Prepare Project Plan

Key Activities	Due Date
1 Assign project team and confirm project phasing	Feb 2025
2 Identify alignment opportunities with other council	Apr 2025
3 Prepare project plan	Apr 2025
Key Deliverables	
a Council Paper: Review of the RPMP	
b RPMP Review 25-27 Project Plan	
4 Submit project plan for council endorsement	Apr 2025

Phase Two: Engagement

Key Activities	Due Date
5 Prepare project communications plan/s	Jun 2025
Key Deliverables	
a RPMP Review 25-27 Engagement Plan	
b RPMP Review 25-27 Communications Plan	
6 Prepare project engagement plan	Jun 2025
7 Undertake internal stocktake and neighbouring council alignment	Jun 2026
8 Undertake engagement process	Oct 2026
Key Deliverables	
a Summary of internal stocktake	
b Summary of key stakeholder engagement	
c Summary of values, species and site information	

Phase Three: Draft Proposal

Key Activities	Due Date
9 Finalise RPMP proposal document	Oct 2026
10 Submit	
11 Prepare and submit RPMP proposal to Council	Oct 2026
Key Deliverables	
a Proposal for the Otago Regional Pest Management Plan	
b Maps to support the Proposal	
c Economic (Cost Benefit) Analysis for Species of Interest	
d Assessment of the Proposal against Section 70 of the Act	
e Summary of Stakeholder Engagement toward the Proposal	

Phase Four: Public Notification

Key Activities	Due Date
12 Finalise notification toolbox (discussion document, online content)	<i>Dec 2026</i>
13 Publicly notify and introduce all documentation (Section 70. First Step)	<i>Jan 2027</i>
14 Collate written submissions	
Key Deliverables	
a Summary of Submissions	

Phase Five: Hearing

Key Activities	Due Date
15 Council appoints hearing panel and decide on reports to be required	
16 Hearing Dates are Scheduled	
17 Prepare hearing documents	<i>Apr 2027</i>
Key Deliverables	
a Opening Presentation	
b Recommendation Report (summarise plan, key themes, recommendations)	
c Summary of Submissions (grouped by topic, note, accept/reject, reason)	
d Annotated Version of the RPMP (set out the recommended changes)	
18 Undertake hearing	<i>May 2027</i>
Key Deliverables	
a Response to Minutes issued by the Hearing Panel	
b Closing Recommendations	
19 Hearing Panel request further work	<i>Jul 2027</i>
20 Prepare and submit final proposal to hearing panel	<i>Nov 2027</i>
Key Deliverables	
a Proposal for the Otago Regional Pest Management Plan (Final)	
b Annotated Version of the RPMP (set out approved changes)	
21 Submissions on amended proposal close	<i>Nov 2027</i>
Key Deliverables	
a Hearing Panel issue a minute that they are satisfied with consultation	
22 Hearing Panel satisfied that Sections 70-73 of the Act have been met	<i>Mar 2027</i>
Key Deliverables	
a Hearing Panel Decision Report (incl. submission summary)	
b Formal Minutes of the Hearing Panel	
c Hearing Panel issue a minute that they approve the preparation of a plan	
d Hearing Panel issue a minute on the identity of the management agency	
23 Close submission process by providing a copy of the decision report to submitters	<i>Nov 2027</i>
24 Hearing process closed	<i>Nov 2027</i>

Phase Six: Draft Proposal

Key Activities

- 25 Prepare the final plan based on approved proposal *Feb 2028*

Key Deliverables

- a Otago Regional Pest Management Plan 2019 – 2029; tracked text version
- b Otago Regional Pest Management Plan 2028 – 2038
- 26 Submit documentation to council for decision *Mar 2028*

Phase Seven: Decision

Key Activities

- 27 Council satisfied that plan meets all requirements of the Act *Mar 2028*
- 28 Council approves final Otago Regional Pest Management Plan 2028 – 2038 *Mar 2028*
- 29 Council publicly notifies approval of plan and location where plan can be accessed *Mar 2028*

Key Deliverables

- a Online version of Regional Pest Management Plan 2028 – 2038 available
- 30 Environment Court appeals process opens (15 working days) *Apr 2028*
- 31 Council affixes Seal to the new Otago Regional Pest Management Plan *Jun 2028*

Key Deliverables

- a Otago Regional Pest Management Plan 2028 – 2038
- 32 Otago Regional Pest Management Plan 2028 – 2038 operative *Jul 2028*

4. Project Milestones

Key milestones are controlled activities for which the resourcing, timeframes and progress can be closely managed by the Project Team.

Key Milestone	Related Step in the Biosecurity Act	Due Date
Project Plan Endorsed by Council		May 2025
Formal Engagement Actions Complete		Oct 2026
Proposal Submitted to Council	Meet requirements under Section 70 Meet requirements under Section 71	Oct 2026
Public Notification Period Ends	Meet requirements under Section 72	Feb 2027
Final Proposal Submitted to Hearing Panel	Meet requirements under Section 73	Nov 2027
Plan submitted to Council for Decision	Meet requirements under Section 74 Meet requirements under Section 74	Feb 2028
Plan Operative	Meet requirements under Section 75 Meet requirements under Section 76 Meet requirements under Section 77	Jul 2028

5. Alignment Opportunities

5.1 Biosecurity Act 1993 Review

A review of the Biosecurity Act 1993 is currently underway. The purpose of the review is to update and modernize the Act. The call for submissions closed on 13 December 2024 and a summary of submissions was released on 20 March 2025. Final policy recommendations are to be submitted to the Minister later this year. Consideration should be given to the Act amendment date, as the approved Act may not be released prior to the submission of the RPMP proposal for council approval (*Section 71. Second Step*) in July 2026.

5.2 Otago RPMP 2019 – 2029 Effectiveness Review

A review into the Effectiveness of the Otago RPMP is in its final stages. The outcomes of this review will be presented to the Council in June 2025. The effectiveness review has a key focus on how successful ORC have been in delivery of the current RPMP. Incorporating

recommendations and lessons learned from this review, into the wider RPMP review, will ensure identified improvements are formally captured.

5.3 Otago Regional Council Elections October 2025

Council elections occur in October 2025. To ensure Council is kept informed a full update of the RPMP review, progress toward key milestones and the meeting of key deliverables is proposed to be provided to Council in November 2025. Additionally, a full Council workshop is proposed for February 2026 to ensure Councilors have an opportunity to investigate and contribute to the RPMP proposal document.

5.4 Alignment with Other Council

There is a collective agreement between neighbouring councils that alignment of RPMP reviews is considered critical to the success of the drafting of future plan objectives and rules to support a collective response to biosecurity issues.

The timeframes provided in this project plan support alignment opportunities, by ensuring that there is ample lead-in time for preparation, prior to key stakeholder engagement commencing (see Appendix 4 for detail).

Council	Current Plan	Commencement	Public Notification	Plan Operative
ORC	2019-2029	2025	2027	2028
ES	2019-2029	2026	2028	2029
ECan	2018-2038	2025	2028	2029

Key alignment opportunities are as follows:

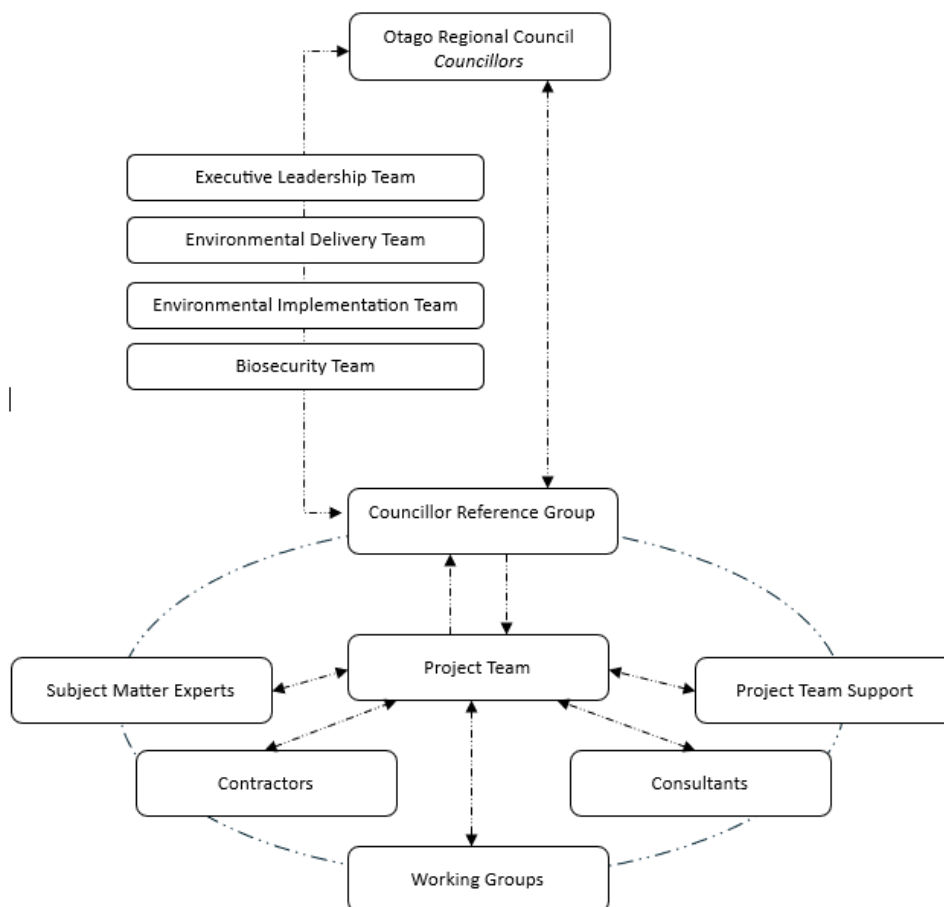
- 1 Financial and time savings through the shared use of external consultants across the three Councils. The vision of the RPMP Working Group is to collectively engage external legal and environmental planning advice to significantly reduce costs to individual councils.
- 2 Financial and time savings through collaborative approaches to the development of key proposal documents. For example, there could be considerable time (and therefore cost) efficiency if the RPMP Working Group were able to combine the basis of the cost-benefit analysis into one document, for use within each council review, rather than the usual three documents.
- 3 Financial and time savings from a collaborative high-level engagement approach could also be realised. If the RPMP Working Group can engage with key stakeholders in a single setting, the efficiency of this process could be significantly increased.
- 4 Higher quality review outcomes are likely to be achieved where external advice is obtained from an individual consultant, rather than the multitude. This will provide sought after consistency and the ability for advice to be tested by the RPMP Working Group through a collaborative engagement process, rather than individually. ORC procurement policies will be followed to enable this.

-
- 5 Higher quality review outcomes are likely to be achieved through a collaborative approach to engagement. Key stakeholders can work through the engagement process with representatives from all three councils, enabling cross-boundary issue identification and problem solving.
 - 6 Higher quality review outcomes are likely to be achieved through undertaking collaborative high-level mana whenua consultation processes. This will ensure cross-boundary interests are identified and included in engagement processes.
 - 7 Long-term higher quality outcomes are likely to be achieved through regional alignment of plan objectives and rules, where relevant species allow. This will ensure that pest species on boundaries, or within identified pathways, are subject to the same rules and requirements.
 - 8 Long-term higher quality review outcomes are likely to be achieved through strengthening understanding of, and methods relating to, biosecurity management and how a collective approach can improve outcomes.
 - 9 Time efficiencies will be realised where councils are provided a pathway for resource, skill and expertise sharing. A collaborative approach will also support the timely capture of inconsistencies in information, shared problem solving and document review from a collaborative team with a wide range of backgrounds and experience across the three Councils.
-

6. Project Management

6.1 Governance

The project management and delivery structure aligns with the ordinary structure of ORC. The Council is the RPMP review Project Owner and delivery of the RPMP project will be managed along normal lines of management, through the Project Team.



It is proposed that a **Councillor Reference Group** be formed that will incorporate the Project Team with a subset of the Council. This group will have an oversight role in project management delivery, monitor progress across key milestones and deliverables, consider risk impact and undertake assessment where necessary and audit quality against the plan.

Effective delivery of this project will produce an updated RPMP document that will contribute to the achievement of the Councils wider strategic goals through the development of clear objectives and enforceable rules for pest management across Otago.

6.2 Project Delivery

The **Project Lead** is ORC's Manager, Environmental Implementation. This role will oversee project delivery and ensure that key milestones are being met as planned. This role will also provide advice and support to the Project Coordinator and wider Project Team and will provide guidance through periods of issue management. The Project Lead will front progress updates to Council and ensure that Council requirements reach the Project Team for action.

The **Project Coordinator** is ORC's Biosecurity Specialist - Terrestrial. This role is responsible for breaking down the project into manageable phases, developing key activities and deliverables within each project phase and ensuring delivery of these activities within the required timeline and associated budget. This role is also responsible for progress monitoring and reporting on key aspects of the project (e.g., timeline, budget, deliverables).

- 6.2.1 The **Project Team** will be led by the Project Coordinator, with support from the Project Lead. ORC personnel assigned to the Project Team are:

Project Team

Project Lead	Team Leader Environmental Implementation
Project Coordinator	Biosecurity Specialist - Terrestrial
Project Team	Team Leader Biosecurity
Project Team	Policy - Freshwater & Land
Project Team	Biosecurity Specialist - Marine & Freshwater

The Project Team will be supported by ORC personnel who have specialist skills. ORC personnel assigned as **Project Team Support** are:

Legal Council
 Policy Team Leader - Freshwater & Land
 Scientist - Science Facilitation
 Principal Advisor - Strategic Engagement
 Team Leader - Media & Communications
 Spatial Analyst - Information Technology

The Project Team will be supported by ORC personnel who are experts in their field. ORC personnel assigned as **Subject Matter Experts** are:

Biosecurity – Delivery Lead
 Biosecurity – Delivery Lead
 Biosecurity Officer
 Biosecurity Officer
 Project Delivery Specialist - Biosecurity
 Project Delivery Specialist - Biosecurity

6.3 Additional Resource

Working Groups will be developed to capture, collate and distil information (e.g., value, impact, significance) on species and/or sites of interest. The formulation of these groups is under development, but the vision is for several groups, all with a special interest topic, collecting and collating information for analysis, the substance of which will feed into the RPMP proposal document.

Consultants will be required to provide specialist expertise where unavailable from internal sources (e.g., timing constraints, workload). Consultants will report directly to the Project Coordinator, who will provide progress reports and updates to the Project Team and Steering Group. Required consultants will include legal advisers, planners and experts in ecological management.

Contractors will be engaged to work as part of the Project Team. Contractors will provide supporting services across engagement, project review and information collation and analysis.

6.4 Project Budget

A forecast budget will be drafted for the project delivery, once the detailed activity plans have been approved. A budget-tracking document (forecast vs actual expenditure) will be maintained and monitored by the Project Coordinator. Financial updates will be included in monthly progress reports.

6.5 Risk Assessment & Controls

A risk matrix and a risk register are included in this project plan (see Appendix 3 for detail). This risk register will be maintained as a separate document, to be regularly updated and reviewed at each project team meeting. A current copy of the risk register will be included with the progress report.

6.6 Progress Reporting

Reporting Requirement	Responsibility	Frequency	Format
Progress Report	Project Coordinator	Monthly	Written
Risk Register Update	Project Coordinator	Monthly	Written
Finance Tracking Update	Project Coordinator	Monthly	Written
Status Report	Consultant	At key intervals (SOW)	Written
Full Progress Update	Project Coordinator	Monthly	Verbal, Team Mtg

APPENDIX 1: RPMP Review under the Biosecurity Act 1993

Section 70. First Step: Plan Initiated by Proposal

[Section 70] states that to 'make' a regional pest management plan, a proposal is required. The required content of that proposal is described in this section of the Act.

Section 71. Second Step: Satisfaction on Requirements

[Section 71] requires the Otago Regional Council to be satisfied that the proposal meets all prerequisites of Section 70, is consistent with related national policy direction, that the proposal benefits outweigh the costs, and that proposed rules would allow the council to meet stated objectives under the proposed plan.

Section 72. Third Step: Satisfaction with Consultation

[Section 72] requires the Otago Regional Council to be satisfied that key stakeholders have been adequately consulted with and that there is a suitable level of support for the proposal as submitted. The council must decide whether they require further consultation on the proposal, prior to moving on to the fourth step of the process. This step will likely require public notification of the proposal and a public hearing to hear feedback from the community.

Section 73. Fourth Step: Approval of Preparation of Plan

[Section 73] requires the Otago Regional Council to be satisfied that Sections 71 and 72 above have been met and, if satisfied, approve the preparation of a plan. The Act clearly describes the required content of the plan and sets out the process for the establishment of rules within the plan.

Section 74. Fifth Step: Satisfaction on Contents of Plan and Requirements

[Section 74] requires the Otago Regional Council to be satisfied that the plan prepared under Section 73 above has meets all requirements of Sections 70 – 73 above. The provision of adequate funding is a key consideration.

Section 75. Sixth Step: Decision on Plan

[Section 75] requires the Otago Regional Council to be satisfied that Sections 70 – 74 above have been met and provide a decision on the Final Plan.

Section 76. Application to Environment Court about Plan

[Section 76] provides a pathway for any person who submitted on the Proposal the opportunity to appeal the decision on the Final Plan through the Environment Court. An appeal must be made within 15 days after the date of public notification of the decision on the plan.

Section 77. Making of Plan

A plan is made by the Council fixing the Councils seal to the plan.

APPENDIX 2: Reference Documents

Biosecurity Act 1993	Available online
National Policy Direction for Pest Management	Available online
Otago Regional Pest Management Plan 2019-2029	Available online
Otago Biosecurity Strategy	Available online
Otago RPMP 2019-2029 Effectiveness Review	(Under review)
ORC Biosecurity Annual Operational Plan 2025-2026	(Under review)
RPMP Review Engagement Strategy	(In development)

APPENDIX 3: Risk Assessment

Likelihood (L)	Potential Consequence (PC)						
	Not significant (1)	Minor (2)	Moderate (3)	Major (4)	Severe (5)		
Almost certain (5)	Moderate	High	Severe	Severe	Severe		
Likely (4)	Moderate	High	High	Severe	Severe	Accept	
Possible (3)	Low	Moderate	High	High	Severe	Watch	
Unlikely (2)	Low	Low	Moderate	Moderate	High	Mitigate	
Rare (1)	Low	Low	Low	Low	Moderate	Act	

Risk	Without Controls			Controls	With Controls		
	L	PC	Risk Rating		L	PC	Risk Rating
Not meeting milestones	5	5	Severe	<ul style="list-style-type: none"> Clear roles and responsibilities Robust planning Timely decision making Timely provision of support to Project Team Continual review and adjustment Leadership oversight 	3	4	High
RPMP Effectiveness Review findings require significant process change	5	5	Severe	<ul style="list-style-type: none"> Council and ELT commitment Leadership oversight Robust financial forecasting Continual review and adjustment 	3	4	High
Council Elections impact on review process	5	5	Severe	<ul style="list-style-type: none"> Clear roles and responsibilities Robust planning Timely decision making Timely provision of support to Project Team Continual review and adjustment Leadership oversight 	3	4	High
Uncontrolled activities impact on timeline	5	5	Severe	<ul style="list-style-type: none"> All of team, robust planning approach Other council advice and support Continual review and adjustment 	3	4	High
Uncontrolled activities impact on budget	5	5	Severe	<ul style="list-style-type: none"> Council and ELT commitment Leadership oversight Robust financial forecasting Continual review and adjustment 	3	4	High
Not meeting milestones	5	5	Severe	<ul style="list-style-type: none"> Clear roles and responsibilities Robust planning Timely decision making Timely provision of support to Project Team Continual review and adjustment Leadership oversight 	3	4	High
Not meeting milestones	5	5	Severe	<ul style="list-style-type: none"> Clear roles and responsibilities Robust planning Timely decision making Timely provision of support to Project Team Continual review and adjustment Leadership oversight 	3	4	High

Risk	Without Controls			Controls	With Controls		
	L	PC	Risk Rating		L	PC	Risk Rating
No control over support staff priorities	5	4	Severe	<ul style="list-style-type: none"> Leadership commitment to process Leadership oversight Robust planning process Robust internal communication processes Collective understanding of priorities 	3	3	High
Misunderstanding requirements of Biosecurity Act 1993	5	5	Severe	<ul style="list-style-type: none"> Engage technical support and follow advice Leadership oversight Robust planning Documented actions and outcomes 	2	4	Moderate
Biosecurity Act review timeframes don't align with review	4	4	Severe	<ul style="list-style-type: none"> All of team, robust planning approach Other council advice and support Continual review and adjustment 	3	4	High
Poor consultation outcomes	4	4	Severe	<ul style="list-style-type: none"> Consistent branding Clear, concise and consistent key messaging Full spectrum of communication methods Allow adequate time for responses Transparent decision-making processes 	2	4	Moderate
Unplanned work impacts	5	5	Severe	<ul style="list-style-type: none"> Leadership oversight Appropriate levels of resourcing Wider team support during critical periods Collective understanding of priorities 	2	3	Moderate
Consultant or contractor delays	4	5	Severe	<ul style="list-style-type: none"> Leadership oversight Adequate timeframes allocated Robust procurement processes Robust contractor management processes Expectations described via contract conditions 	2	4	Moderate
Poor internal communication	3	4	High	<ul style="list-style-type: none"> Clear roles and responsibilities Clear reporting lines Consistent messaging Leadership commitment Individual and team engagement 	2	3	Moderate

APPENDIX 4: Forecast Timeline

Phase	Process Step	2024/2025					2025/2026					2026/2027					2027/2028													
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
1	Preparation.																													
	Council Endorse Project Plan																													
	Internal Stocktake & Council Alignment																													
	Council Update																													
	Council Update																													
	Council Update																													
	Council Update																													
2	Engagement Process																													
	Council Update																													
	Council Update																													
	Council Update																													
3	Draft Proposal																													
	Section 70. First Step.																													
	Section 71. Second Step.																													
4	Council Update																													
	Public Notification																													
	Prepare Hearing Documents																													
5	Council Update																													
	Public Hearing																													
	Hearing Panel Direct Further Work																													
	Council Update																													
	Section 72. Third Step.																													
	Hearing Panel Deliberations																													
	Prepare Final Proposal & Submit																													
	Council Update																													
	Section 73. Fourth Step.																													
	Council Update																													
6	Prepare Final Plan																													
	Section 74. Fifth Step.																													
	Section 75. Sixth Step.																													
	Section 76. Appeal.																													
	Council Update																													
7	Section 77. Making of a Plan.																													

9.1. Regional Pest Management Plan Review Options

Prepared for: Environmental Implementation Committee

Report No. GOV2443

Activity: Governance Report

Author: Murray Boardman, Performance and Delivery Specialist and Libby Caldwell, Manager Environmental Implementation

Endorsed by: Joanna Gilroy, General Manager Environmental Delivery

Date: 4 December 2024

PURPOSE

- [1] To present options for the potential review of Otago's Regional Pest Management Plan.

EXECUTIVE SUMMARY

- [2] The Regional Pest Management Plan (RPMP) is a statutory requirement under the Biosecurity Act 1993 (the Act). Otago Regional Council (ORC) is the 'deemed management agency' to implement Otago's RPMP under the Act. Council's current RPMP was established by Council resolution on 25th September 2019, with a duration of 2019-2029.
- [3] The RPMP needs to be reviewed at least once every 10 years. However, a review can be brought forward. Reasons to bring forward a review include if the plan, or part of it, is failing to achieve its objectives or that relevant circumstances have changed since the plan commenced.
- [4] To address some inconsistencies within the current RPMP, implementation challenges, along with the prescriptive approach and the time involved to prepare a new RPMP under the Act, it is recommended the Council undertake a full review of the RPMP prior to the current 10-year timeframe of 2029. This paper presents four options to review the RPMP. Given the potentially extensive requirements to issue a revised or new RPMP and resourcing associated with this, it is necessary to consider timeframes now.
- [5] To meet the 10-year requirement, funding has been allocated for the consultation and in updating the RPMP in Year 5 of the Long-Term Plan (LTP) (FY28-29). Some funding is allocated each year of the LTP to contribute to the review of the RPMP in advance of Year 5 of the LTP.

RECOMMENDATION

That the Committee:

- 1) **Notes** this report.
 - 2) **Recommends that the Council approves** the recommendation of **Option 3A** to undertake a full review of the Regional Pest Management Plan (RPMP) and **provides** staff direction as to the year this would be started.
 - a) **Notes** that the timing of the recommended option may be dependent on when the current Biosecurity Act is amended by Parliament.
-

- b) **Notes** that staff will make any necessary adjustments to budgets through the 25/26 Annual Plan process.

BACKGROUND

- [6] Regional Councils have a mandate under Part 2 of the Act to provide regional leadership in activities that prevent, reduce or eliminate adverse effects from harmful species that are present in their region. Otago Regional Council (ORC) is the deemed management agency to implement Otago's RPMP under this part of the Act.
- [7] The current RPMP was established by Council resolution on 25th September 2019, with a duration of 2019-2029. Section 77 of the Act enables a RPMP to become operative and remain in force for a period of 10 years. Consequently, the RPMP will need to be reviewed by 24th September 2029.
- [8] The RPMP may cease at an earlier date than the ten years if Council declares by public notice that the objectives of the RPMP have been achieved. It may also cease at an earlier date if, following a review, it is revoked.
- [9] Section 100D of the Act sets out the obligations to review the RPMP. In the context of this paper, the following obligations under this section are relevant:
- a) The RPMP needs to be reviewed at least every 10 years [Section 100D(1)(c)].
 - b) The RPMP may be reviewed, in part or in whole, if the Council (or Minister) has reason to believe that the plan, or part of it, is failing to achieve its objectives or that relevant circumstances have changed since the plan commenced [Section 100D(2)].
 - c) A review can be initiated by the Minister, Council or any other person [Section 100D(4)].
- [10] Minor changes can be made to the RPMP at the discretion of the Council through a resolution [Section 100G(4)] without going through the requirements of Section 100D.

DISCUSSION

- [11] The current RPMP will need to be updated by 24th September 2029. This is a statutory requirement of a review needing to be conducted within 10 years of the RPMP coming into force. To meet this requirement, funding has been allocated to review the RPMP in Year 5 of the current LTP FY28-29.
- [12] An assessment into the effectiveness of implementing the current RPMP is presently underway. Results of this assessment will be presented to Council in March 2025. The limitations identified with the RPMP (see below) relate more to the content where the effectiveness review has a focus on ORC's delivery of the RPMP. It would be timely to incorporate any recommendations from the assessment of effectiveness into a wider review of the RPMP, to ensure the lessons learnt are formally captured. For each option presented below the findings of the effectiveness review will be able to be incorporated if relevant.
- [13] Staff have identified some limitations with the current RPMP, as outlined in the table below, that reduces its effectiveness to manage pests.

Issue	Example
Rule inconsistencies between different plant species	<ul style="list-style-type: none"> Some pest plants have a Good Neighbour Rule yet are non-compliant by presence (contradictory) (e.g. Old Man's Beard). Some pest plants can be present yet compliant (e.g. ragwort).
Implementation challenges	<ul style="list-style-type: none"> wilding conifer rules are challenging to interpret (e.g. scale of the issue) and they don't acknowledge wider issues (e.g. erosion control).
Editing errors	<ul style="list-style-type: none"> The rule for gorse includes a typographical error that essentially confuses the new Gorse & Broom free areas with the old Gorse & Broom areas.
Inconsistent terminology with National direction.	<ul style="list-style-type: none"> Most rules state 'eliminate' yet this is inconsistent with the programme types in national direction.¹
Inflexible to the progression of compliance and enforcement procedures	<ul style="list-style-type: none"> The current RPMP is not flexible enough to incorporate lessons learnt during implementation.
Duplication of pests	<ul style="list-style-type: none"> Wallabies are listed as an eradication pest yet are also listed under site-led (the only pest to appear in dual programmes).
Number of declared pests in ambiguous.	<ul style="list-style-type: none"> The RPMP states there are 51 declared pests (see forward) yet Table 2 lists 46, other pages have 42.
Inflexible to add new pests	<ul style="list-style-type: none"> The inability to add new pests means the RPMP can become out-of-date.²
Changed community expectations about what pests should be included	<ul style="list-style-type: none"> Community concerns about pests that are not covered in the plan.

[14] Council also has a Biosecurity Strategy and a Biodiversity Strategy. The interaction between the RPMP and the Biosecurity Strategy is not clear and in some place's overlaps. The Biodiversity Strategy is currently being reviewed and intends to cover Biosecurity as well. This review intends to focus on ensuring there is less overlap with the RPMP and clarity is provided. Any review of the RPMP would ensure that there is improved alignment between the RPMP and the Strategy.

[15] Any review (excluding minor changes) will be a significant investment of time and funding due to the need to meet the requirements of the Act. A full, or partial review will require public consultation and a cost benefit analysis for any organism that is currently, or has the potential to be a, declared a pest in Otago.

¹ 'Eliminate' should only apply to exclusion and eradication programmes. For progressive containment, sustained control and site-led programmes, a term related to the 'reduction in pest density' would seem to be more appropriate.

² The inflexibility to add new pests is largely a restriction of the Biosecurity Act, which is currently under review.

- [16] The Biosecurity Act is currently under review and is presently out for public consultation. To ensure consistency with the amended Act, it would be preferable for any full review of the RPMP to wait until after the amended Act was passed by Parliament. This will have implications on the timings of which option is preferred. Other Councils nationally are currently, or will be reviewing their own RPMP's including Environment Southland and Environment Canterbury.

OPTIONS

Option 1: Minor changes

- [17] Section 100G(4) of the Act allows the RPMP to be amended from time to time by Council resolution without a review under section 100D. A minor change is one that does not have a significant effect on any person's rights and obligations and is not inconsistent with the national direction.
- [18] As it is likely the addition or removal of a pest, or modifying pest rules, in the current RPMP will have a material effect on someone's rights and obligations, a minor change would, essentially, be limited to correcting typographical/editing errors and improving internal processes to administer the RPMP. The findings of the effectiveness review will be able to be incorporated if relevant and considered to be 'minor'.
- [19] This option would not be able add or remove any pests, or correct any inconsistent terminology related to rules. However, it would be able to be completed in 2-3 months and be the lowest cost.
- [20] Under this option a full review would still be required prior to 2029 (e.g. Option 3A or 3B). As this is an interim option, it could be completed before the Biosecurity Act was amended.

Option 2: Partial Review

- [21] A partial review of the RPMP is permitted under the Act to address to specific issues. It would allow the opportunity to consider adding or removing specific pests and to correct any inconsistent terminology around the rules. A partial review would also include addressing the issues under Option 1.
- [22] A partial review would include public consultation and require cost benefit analysis of any pests to be added or removed. The findings of the effectiveness review will be able to be incorporated if relevant.
- [23] This option could be completed in approximately 9-12 months and would have moderate costs but would not likely require a dedicated resources to support it. However, there is the risk of duplicated costs because a full review would still be required. A partial review could be completed before the Biosecurity Act was amended.
- [24] As with Option 1, a partial review would be an interim step requiring a full review prior to 2029 (e.g. Option 3A or 3B). This would mean two processes would need to be completed between now and 2029.

Option 3A: Full Review – completed by 2027 (recommended option)

- [25] The Act does not prescribe when a full review of the RPMP can be done, except that it must be completed within 10-years of commencement. This means Council could decide to undertake a full review of the plan before 2029.
- [26] A full review would consider all regulatory³ aspects of pest management as per the direction of the Act, including the assessment of any organism that had the potential to be a declared a pest in Otago (e.g. marine pests).
- [27] This option would cover any issues that were expected to be addressed in Options 1 and 2. A full review would take into consideration any recommendations from the review into the effectiveness of the current RPMP. It would also enable pests, including marine pests that are not currently included in the RPMP to be included.
- [28] Under this option work would commence in the second half of 2025 and likely be completed by 2027. This timeline is based on experience with the timelines for the last review which took 18 months, but staff would look to ensure that the process was as efficient as possible. Undertaking a full review would require dedicated resources to deliver this work. It is also more expensive when compared to options 1 and 2, but funding is set aside for year 5 of the LTP and could be brought forward.
- [29] This option would enable the review of the RPMP to be undertaken as soon as it is possible, allow for incorporation of the findings of the effectiveness review, address the current issues with the RPMP and not result in a duplication of processes by not taking any interim steps. It would also ensure that the update to the RPMP was happening closer to when the supporting strategies are being updated.

Option 3B: Full Review – completed by 2028

- [30] This option is the same as 3A except the completion date would be in 2028. Under this option work would commence in 2026 and be completed by 2028.
- [31] This option would enable the financial cost of this review to be pushed out until the 2027/28 financial year, a year later than proposed in Option 2. Currently in the LTP this is budgeted for in year 5 which is the 2028/29 financial year which brings the review forward one year than has been signed off. However, it would mean longer until any issues with the current RPMP are addressed and may result in continued misalignment with supporting strategies.
- [32] The findings of the effectiveness review will be able to be incorporated if relevant.

Option 4: Full review – completed by 2029 (status quo)

- [33] As the current RPMP commenced in 2019, there is a requirement under the Act for the RPMP to be reviewed by no later than after 10-years of commencement. This option is the same as Option 3A/B except the date for completion would be set for no later than September 2029.
- [34] This option is, in effect, the status quo option and is when has been budgeted to complete this in the LTP. The findings of the effectiveness review will be able to be incorporated if relevant.

³ Non-regulatory actions would be included as part of the ORC Biosecurity Strategy.

- [35] Duration and resourcing would be the same as Option 3A/B.

Option Analysis and Recommended Option

- [36] Options 1 and 2 are not considered practical as they are both interim reviews and would still require a full review shortly after. Due to this reason these options are not preferred.
- [37] Option 4 is the status quo option which means the current RPMP will continue until 2029. Compared to Option 3A/B, this option delays addressing any existing issues in the RPMP and defers the consideration of other potential pests (e.g. marine pests). Consequently, this option is not preferred.
- [38] Option 3A is the preferred option. This brings forward addressing the existing issues in the RPMP and the consideration of potential pests as soon as practical. This option would also mean any interim reviews are not required. The decision for Option 3A or 3B relates solely to the completion date as guided by Council.
- [39] One challenge with Option 3A is the unknown timeframe of the Biosecurity Act review. However, this can be addressed by pre-planning to ensure the full review commences as quickly as possible after the amended Biosecurity Act comes into operational effect. Some work can start while the Act is being reviewed such as undertaking cost benefit analysis for individual pests.

CONSIDERATIONS

Strategic Framework and Policy Considerations

- [40] The ORC Biosecurity Strategy is being revised and will ensure there is better alignment with the RPMP to reduce the overlap between the documents.

Financial Considerations

- [41] \$1.5 million of funding has been allocated in 2028/29 LTP budget to undertake a full review. Depending on timing⁴, this funding may need to be brought forward. Given their interim nature, additional funding may need to be allocated for Options 1 and 2.

Significance and Engagement Considerations

- [42] Option 1 would not require any public engagement considerations. Options 2, 3A/B and 4 would require public consultation.

Legislative and Risk Considerations

- [43] The main legislative consideration is the planned amendments to the Biosecurity Act. This is likely to influence the timing of the options, especially for Options 3A or 3B.

Climate Change Considerations

- [44] No direct considerations related to climate change. Any climate change effects will be addressed in the cost-benefit analysis for individual pest species.

Communications Considerations

⁴ The most critical date is when the amended Biosecurity Act comes into force.

- [45] As a partial or full review would require public consultation, an appropriate communication plan would need to be developed.

NEXT STEPS

- [46] Prepare workplan based on agreed option, including budget re-allocations to be addressed through Annual Plan if needed.

ATTACHMENTS

Nil

9.2. Rabbit issues in Public/Crown land

Prepared for: Environmental Strategy and Planning Committee

Report No. GOV2569

Activity: Governance Report

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Endorsed by: Joanna Gilroy, General Manager Environmental Delivery

Date: 22 May 2025

PURPOSE

- [1] To provide information regarding complications faced by private land occupiers undertaking rabbit management on land bordering Public/Crown land.

EXECUTIVE SUMMARY

- [2] The feral rabbit is a pest-animal species managed under a sustained control programme within the current Otago Regional Pest Management Plan 2019 – 2029 (RPMP). Land occupiers are required to manage populations on their properties to at or below Level 3 on the Modified McLean Scale to minimise adverse effects on production and environmental values within the Otago region.
- [3] Private land occupiers whose properties border Public/Crown land have raised issues regarding rabbit populations not being controlled, leading to rabbits re-invading their properties. This issue is common near rail corridors and cycle tracks.
- [4] Land occupiers and ORC staff have had limited success engaging with public agencies to enable effective control of rabbits on their properties. The limited applicability of the rules in the RPMP to crown land restricts the ability for staff to undertake enforcement action even when rabbit infestation issues are known. To support effective engagement with Crown agencies it is proposed that Council writes a letter to the relevant Ministers about the importance of this pest control work and impacts on private land occupiers, in areas such as Waiholā.

RECOMMENDATION

That the Committee:

- 1) **Notes** this report.
- 2) **Recommends that Council endorse Option 1 that the Chair write a letter to the appropriate ministers highlighting the limited rabbit management on Crown/public land in Otago which has effects on private land occupiers' ability to manage rabbit populations on their land and opportunities for pest management approaches and programmes on Crown/public land.**

BACKGROUND

- [5] Introduced to New Zealand in the 1850's as a feral game species, rabbits have become an economic, environmental and social issue for the country. MPI, during the recent review of the Biosecurity Act 1993, commissioned an updated report (2009 - 2020) on

the cost of introduced pests to the New Zealand economy. This report was released in October 2021. After analysis, it was reported that the economic impact of feral rabbits had reached more than \$195 million per annum (up from \$61 million per annum in 2009).

- [6] Regional Councils have the primary responsibility for ensuring that rabbit populations are appropriately managed in New Zealand. Current strategic objectives for the Otago Region are contained within the Otago RPMP 2019-2029 and include the sustained control of feral rabbits in order to minimise adverse effects on production and environmental values within the Otago region.

- [7] Private land occupiers throughout Otago have raised issues regarding limited rabbit management being undertaken on Public/Crown land. There are rules in the in the RPMP that cover Crown and public land occupiers, which is a Good Neighbour rule. The Good Neighbour rules only apply to land occupiers of Crown or public land if the immediate neighbours are fully compliant on their own properties. The rule also states that control measures are only required within 500 metres of the boundary of the land occupier that is compliant and a written complaint from an affected party must be received for staff to take enforcement action in these instances. Lack of rabbit management in these areas leads to rabbit control operations on private land that borders public land being ineffective due to re-invasion of rabbits from Public/Crown land.

- [8] Compliance tools are used where appropriate and staff engage with Public/Crown land occupiers regarding pest species management on their land. However, due to budgetary constraints and good neighbour rules there is often limited ability to control pests on this land without significant additional investment. This leads to concern from adjoining neighbours about the level of work completed by Crown/Public land owners and levels of reinfestation.

- [9] The limited applicability of the rules in the RPMP to crown land restricts the ability for staff to undertake enforcement action even when rabbit infestation issues are known. To support effective engagement with Crown agencies it is proposed that Council writes a letter to the relevant Ministers about the importance of this pest control work and impacts on private land occupiers, in areas such as Waihola. There has been a recent visit to Waihola by Minister Patterson who met with a group of farmers concerned about rabbit control and the letter would support continued awareness of this issue at the national level.

DISCUSSION

Rabbit Management in Otago

- [10] Rabbits are a pest species of high importance for the Otago region, and it is critical that any management programme is effective in meeting its strategic objectives. Council is required to give effect to Objective 6.4.6 of the Otago RPMP which is the sustain control of feral rabbits to level 3 on the MMS. The rabbit inspection and compliance programme is a primary tool for this achieving this objective. It involves land occupier education, advocacy for rabbit management and inspections that target predominantly productive farmland. Inspections are followed up with formal compliance processes as required. The community rabbit programme (implemented in 2022) is an associated programme

that supports community engagement in peri-urban environments where rabbits have a high nuisance value to land occupiers.

- [11] Effective control of rabbits on properties with MMS higher than Level 3 is achieved using winter Pindone carrot poisoning followed up with secondary control using night shooting, Magtoxin, ferreting and dogs. Control of rabbits can become ineffective due to re-invasion of rabbits from adjacent land. Rabbit management is most successful if it is undertaken in a coordinated manner between land occupiers.

Crown/Public Land

- [12] Crown/Public land types include (not limited to), roadside verges and roadside reserves, public parks/reserves, conservation estate, cycle trails, railway corridors, beds and banks of rivers and lakes. Public/Crown land makes up ~22% of land in Otago.
- [13] The Crown is subject to the GNR rules in the RPMP under s 69 (5) of the Act, but not other rules in the RPMP. The National Policy Direction for Pest Management and associated guidance documentation states that:

“Binding the Crown is not the primary purpose of GNRs. In addition to GNRs, Crown agencies can contribute to regional pest management plans in other ways if they choose to do so. When plans are developed or reviewed, regional councils and Crown agencies should discuss: shared outcomes, priorities, issues and risks; where Crown activities might align with the regional pest management plan; where coordinating agency and pest management plan programmes could improve their effectiveness or efficiency; the possibilities of voluntary compliance; and opportunities for sharing information, expertise or resources.”

- [14] Private land occupiers throughout Otago have raised issues regarding limited rabbit management being undertaken on Public/Crown land. Lack of rabbit management in these areas leads to re-invasion of rabbits from Public/Crown land onto adjacent private lands. A coordinated approach to pest management is needed, with additional funding required in some Public/Crown land to support the work by private land occupiers to comply with RPMP rules across Otago.
- [15] Council uses the right compliance tool at the right time, but engagement and working together with adjoining landowners is key to successful rabbit control.
- [16] Given the guidance that supports the National Policy Direction, the need to get engagement from Crown agencies as part of the education phase of compliance and concerns from landowners, it is proposed that staff write to Ministers to emphasise the important of engagement on pest control and the need to work together on this matter.

OPTIONS

- [17] Option 1 – Council endorse the Chair writing to appropriate ministers to highlight the impact that a lack of proactive rabbit management on crown/public land is having on land occupiers in Otago and their efforts with pest control as well as the impact on Otago’s economy and environment due to this lack of management.

- [18] Option 2 – Council do not endorse staff progressing this matter further.

CONSIDERATIONS

Strategic Framework and Policy Considerations

- [19] Considerations given to the interface between Private land and Public/Crown land effected by the Otago Regional Pest Management Plan

Financial Considerations

- [20] No financial considerations to Council. Financial costs to private land occupiers who are affected by named RPMP pests on adjacent Public/Crown lands.

Significance and Engagement

- [21] There is no requirement to consult with the community. Engagement on rabbit management is ongoing to ensure effective management is achieved.

Legislative and Risk Considerations

- [22] No legislative and risk considerations

Climate Change Considerations

- [23] Climate change poses risks to biosecurity through factors such as the establishment of new pests, change in the ecological range of current pests and shifts in introduction pathways.

Communications Considerations

- [24] Staff will work with communications and engagement on biosecurity priorities actions, education and engagement on cross property biosecurity issues.

NEXT STEPS

- [25] ORC staff will support the Chair to prepare a letter to Ministers responsible for administering Public/Crown land, expressing concerns regarding pest species management affecting private property occupiers in Otago.

ATTACHMENTS

Nil