

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 6:27:20 AM

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P301

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Fionna McCormick

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

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**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I am writing to oppose the inclusion of feral cats as a pest species covered under the Regional Pest Management Plan. I find this particularly problematic in residential and urban areas as the definition of a "feral cat" is too loose and measures taken to control them other than live capture that includes a careful search for each individual cat's owner will inevitably result in the death of people's beloved pets. It is also my belief that if domestic, homed cats are not allowed to roam in residential and urban areas the rat and mouse population will skyrocket. They would no longer have predators controlling their numbers, their food source (the messy human population) will remain, and with movement of people, trucks, boats in the port etc. even if rodents are controlled by poison etc there will be constant reintroduction. There has also been a large recent increase in the number of pet cats being shot and mistreated in the Dunedin area, and these cruel vigilante attackers will see this classification as vindication of their 'right' to attack any cat that crosses their path. Cruelty to animals is an indicator of future violent behaviour that should not be ignored let alone tacitly encouraged by classifying a common pet as a pest in populated areas. Control of feral cats by kulling has also been shown in recent Australian research to boost the local population as the researchers postulated culling killed the boldest and most dominant cats. This "allowed greater access to resources by remaining cats, thus promoting an increase in juvenile survival." The study was entitled "Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania," by Billie Lazenby, N.J. Mooney, and C.R. Dickman, 13-month study from the Tasmanian Department of Primary Industries, which appeared in a recent edition of the journal Wildlife Research, 2015. I would suggest in order to lower the number of unhomed, unwanted cats that genuinely become feral as opposed to stray, the best, most effective solution is desexing. Make desexing of pet cats cheaper, and then make rules enforcing the registration and desexing of pet cats. Do not label cats as pests, all you are doing is giving rights, and the perception of righteousness to animal abusers. Those people go on to abuse people. Please do not make them feel entitled.

**Please attach your submission or any supporting pictures or documents.**

No Answer

# *FELINE RIGHTS NEW ZEALAND*

P302



*Supporting Your Right To Keep Cats  
Supporting Your Cat's Right To A Safe, Long And Happy Life*

**14 December 2018**

## **Submission To Otago Regional Council Regional Pest Management Plan Proposal Consultation**



**Antifelinism? We're Not Amused!**

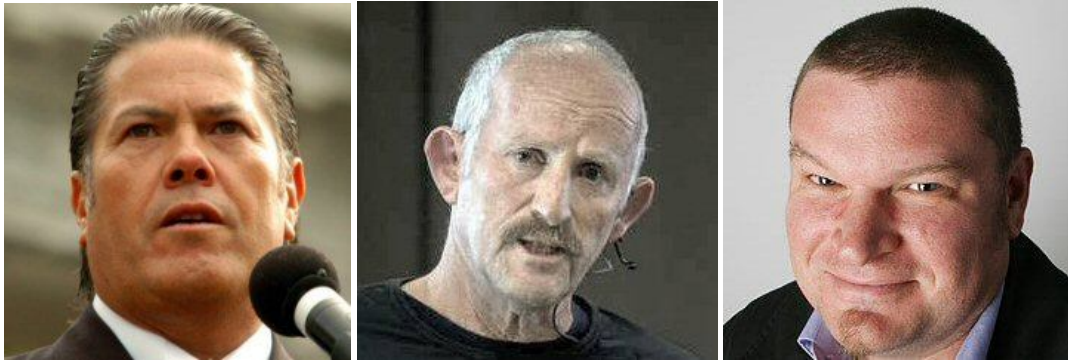
### **Introduction**

New Zealand is presently suffering from a form of mass psychosis, this has occurred due to a deliberate social engineering process intended to indoctrinate New Zealanders into a thoroughly extremist form of environmentalism. No sane person can deny that an ideology with killing as one of its core beliefs is an aberration from the norm. Players in this ongoing social engineering campaign include both Local and Central Government, Local Government New Zealand, Department of Conservation along with various private organisations, for example Forest and Bird, the Morgan Foundation, the Next Foundation, Predator Free New Zealand and others which includes the complicit mainstream media.

Of particular concern to us is the ongoing unjustified demonisation of Cats and those who are guardians of Cats. This in particular has been ongoing and incessant. We've coined the terms antifelinism and antifelinist to cover those within the community who harbor a burning hatred of Cats and those of us who keep Cats in the interest of making the connection between the discrimination directed against Jewish people which occurred in Germany under National Socialist rule. The Jewish people were valuable contributors to society, yet they were demonised and summarily dealt with. The National Socialists went so far as to compare persons of Jewish heritage to rats, subjected them to curfews, required compulsory identification and ultimately consigned millions of individuals to death. Sound familiar? You bet it does!

The comparison between what was done in National Socialist Germany and what is now being done in New Zealand is quite clear for those who have eyes to see and are not in total denial of it. Let's be clear, speciesism is a very similar aberration to racism, thus we feel the term antifelinism is an accurate representation of what is presently being conducted in New Zealand.

## Collective Lobbying By Predator Free New Zealand



Bishop Brian Tamaki - Homophobe -- Gareth Morgan - Antifelinist -- Kyle Chapman - White Nationalist

It has come to our attention that Predator Free NZ is conducting collective lobbying promoting antifelinism via online templates published on the PFNZ website. They have successfully influenced some not so smart regional councils, for example Auckland Council and Greater Wellington Regional Council to embody the arbitrary term 'pest Cats' in their RPMP proposals.

We thoroughly disapprove of collective lobbying tendered via online template because there is no way for councils to be sure such submissions are genuine. Therefore we suggest all collective lobbying from Predator Free NZ be rejected. One submission from an organisation should be sufficient and if their supporters wish to add their voice but are for one reason or another challenged to compose their own submission then all they need do is send a one line email from their own email address stating they endorse the organisation's submission.

Is the council aware that Predator Free NZ is partnered with the well known Cat hater Gareth Morgan's Morgan Foundation? Their website states the Morgan Foundation provide Predator Free NZ with funding, office space, and administration support. This suggests to us Predator Free NZ is little more than another arm of the Morgan Foundation who tirelessly act to indoctrinate New Zealand citizens into antifelinism.

When it comes to Predator Free NZ the council must be clear that what they are dealing with is an extremist group. Following their suggestions for a 'pest' management consultation is the equivalent of supporting the position of Bishop Brian Tamaki and Destiny Church in a consultation on gender diversity and LGBTQ rights, or supporting the position of the White Nationalist movement in a consultation about race relations and the value of multiculturalism. All the council will achieve is the precipitation of social unrest and the council itself being seen in the public eye as an extremist organisation itself.

### The Arbitrary Term "Pest Cats"

Predator Free NZ will ask that all Cats without a functional microchip be classified as 'pest Cats'

New Zealand law places Cats into three categories, 'companion', 'stray' and 'feral'. The definitions of the three types of Cats from a legal perspective is covered in the Ministry of Primary Industries Companion Cats - Animal Welfare (Companion Cats) Code of Welfare 2007, henceforth referred to as The Code.

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>

This is a code of welfare issued under the Animal Welfare Act 1999.

On page 10 of the Code is section 1.8, the glossary, which defines the three types of Cats as follows:

**Companion Cat** - Common domestic cat (including a kitten unless otherwise stated) that lives with humans as a companion and is dependent on humans for its welfare. For the purposes of this code, will be referred to as 'cat'.

**Stray Cat** - For the purposes of this code, means a companion cat which is lost or abandoned and which is living as an individual or in a group (colony). Stray cats have many of their needs indirectly supplied by humans, and live around centres of human habitation. Stray cats are likely to interbreed with the unneutered companion cat population.

**Feral Cat** - For the purposes of this code, means a cat which is not a stray cat and which has none of its needs provided by humans. Feral cats generally do not live around centres of human habitation. Feral cat population size fluctuates largely independently of humans, is self-sustaining and is not dependent on input from the companion cat population.

The legal opinions we have obtained are quite clear that local government has no power to define a particular species as a 'pest'. This is the role of the Governor General acting on the recommendation of the Minister of Conservation under the



Wildlife Act 1953. If the council attempts to follow the directives of Predator Free NZ and collapse the legally defined categories of 'stray' and 'feral' into a single informal category of 'pest Cat' the council will be acting outside of its mandate. This approach would be totally unacceptable to us and would leave the council wide open to legal challenge.

Next we provide evidence of bulk failure of microchips which would make the idea of using microchips to determine who lives and who dies to be totally unworkable in the field with the inevitable consequences of much loved companion Cats being put to death simply for being Cats and because their chip failed to read when scanned.

Our recommendation to the council is to reject the arbitrary term 'pest Cat' and stick with the definitions of Cats as defined under the Code in the interest of avoiding the situation where a ranger may execute a companion Cat and in the interest of avoiding the expense of defending a legal challenge.

## Failure Of Microchips

There is a belief microchips are an infallible method of providing identification. However some veterinarians disagree. Dr Alan Probert, a senior vet at Miramar Vet Hospital is on record as having noticed some microchips failing to scan. He expressed concern that "people are living with a false sense of security about the microchip's ability to track and find their 'pet' if it goes missing" and "My concern and I think it's probably every vet's worst nightmare would be that a dog or a Cat might be inadvertently euthanised, even though it's microchipped". Alan Probert also stated "the problem is occurring across a range of chip makers".

24 October 2012 - Vet Concerned At Faulty Microchips  
<http://www.radionz.co.nz/news/national/119027/vet-concerned-at-faulty-microchips>

In our second example, Dr Roger Barnard of Kerikeri Veterinary Clinic has provided the following statement about microchips to our colleagues at Northland Cats In Balance:

"To whom it may concern, microchips placed into animals can be useful for identification but there have been failures that have occurred. On occasions some expel from the animal soon after insertion, some fail to be read at some later date because of manufacturing failure and movement of microchip to other parts of the body".

The third example provides total proof that microchips are not an infallible method of identifying companion animals. In January 2018, Virbac NZ issued a recall of some 15,000 microchips which they determined are prone to failure. We append the product recall notification from Virbac NZ. We feel this is proof enough microchips can and do fail and thus microchips should not be used to determine who lives and who dies in the name of profit and environmental mass hysteria.



Auckland Protest 28 March 2018 - The shape of things to come throughout the nation

While we have already seen protest action in Auckland, thankfully the protests there have so far been peaceful events. Go down the path of using the microchip ID to determine who lives and who dies and sooner or later companion Cats will be killed and once citizens become aware of it there is no telling what enraged citizens may do. The media will have a field day with it, those elected representatives who voted for it will not escape with their political careers unscathed and social unrest will be an inevitable consequence.

## The Alleged Scourge of Toxoplasmosis Gondii

Toxoplasmosis Gondii is often cited by antifelinists as a fair reason to eradicate all Cats. This single celled parasite has been cited so often by the Cat haters of New Zealand in innumerable informal advertorials advocating politicised 'conservation' published in the compromised mainstream media, it has been likened to listening to a stuck record.

However, toxoplasmosis is not as bad as it is made out to be. Yes, Cats are part of the life cycle of the parasite and if one does not follow sensible hygiene protocol it is possible to become infected with the parasite or many other diseases

The US Centre for Disease Control in Atlanta had this to say about toxoplasmosis in humans: "While the parasite is found throughout the world, more than 60 million people in the United States may be infected with the Toxoplasma parasite. Of those who are infected, very few have symptoms because a healthy person's immune system usually keeps the parasite from causing illness. However, pregnant women and individuals who have compromised immune systems should be cautious".

So it's very common worldwide, rarely has any symptoms at all and most healthy people's immune systems tend to keep the parasite in check. CDC lists the following main sources of infection with toxoplasmosis as:

- \* Eating undercooked, contaminated meat (especially pork, lamb, and venison).
- \* Accidental ingestion of undercooked, contaminated meat after handling it and not washing hands thoroughly (Toxoplasma cannot be absorbed through intact skin).
- \* Eating food that was contaminated by knives, utensils, cutting boards and other foods that have had contact with raw, contaminated meat.
- \* Drinking water contaminated with Toxoplasma gondii.
- \* Accidentally swallowing the parasite through contact with cat feces that contain Toxoplasma.

The bottom line is providing one engages in commonsense hygiene protocol, one is much more likely to be infected with the parasite via contaminated food and water than from a Cat.

As counterpoint, we would add the very birds whom misguided 'conservationists' seek to protect via advocating draconian antifelinist proposals come with their own array of transmissible diseases.

MBIE's Health and Safety Advice states:

"Bird droppings, especially in large concentrations, present a risk of disease to humans. Bird droppings are likely to be found during the following types of work which access nesting sites such as ledges, eaves and lofts: Construction work, maintenance work, working in roof spaces and demolition work. The most serious risks arise from organisms that thrive in droppings, nesting materials and feathers. These include:

- \* Bacterial: e-coli, salmonella, listeriosis, campylobacter, psittacosis
- \* Fungal: histoplasmosis, cryptococcosis, candidiasis
- \* Viral: meningitis, Newcastle disease
- \* Parasitic/Protozoal: toxoplasmosis, trichomoniasis

There you have it, according to MBIE, the birds themselves are one of the vectors for transmission of toxoplasmosis. Should we dispose of all of the birds to deal with the supposed scourge of toxoplasmosis? Of course not, and neither should toxoplasmosis be used as an excuse to dispatch Cats and deny NZ citizens of their customary right to keep Cats in the name of the engineered environmental psychosis which presently infects the collective psyche of the nation.

## PAPP (Para-Aminopropiophenone) - The Zyklon-B Of Predator Free



Spot the difference - Two different poisons, their usage in enforcement of totalitarian political policy is the same.

Marketed by NZ company Connovation as Predastop, PAPP kills via hypoxia, coma, and death due to the inhibition of cellular respiration. Connovation's brochure states "The onset of symptoms is rapid and stoats and Cats are usually unconscious within 45 minutes", however the information we have received suggests it is a terrible inhumane poison:

Quote:

After a cat has ingested a bait containing PAPP there is a lag period before signs of toxicosis such as head nodding, lethargy, ataxia (uncoordinated movement and difficulty maintaining balance), salivation and sometimes vomiting are observed. As the toxicoses progresses, cats collapse and cannot move voluntarily. They appear unresponsive, but still show signs of awareness until they become unconscious for a short period just before death. The duration of the lag phase, duration and severity of symptoms and time to death can be highly variable.

In a pen study of 31 feral cats that ingested 78mg PAPP baits, the average time from bait consumption until signs of poisoning was 3 hours 51 minutes (range 43 minutes to 15 hours). The average time from onset of symptoms to collapse was 72 mins (range zero to around 5½ hours) and the average time from collapse to death was 107 minutes (range 30 minutes to around 8 hours). So this bait can go either relatively well, or terribly for the animal involved. Feeling deathly ill, to actual death, can range from 43 minutes to 15 hours. The period from collapse to insensibility which is identified as a time where an animal is conscious and aware, but unable to defend itself or move voluntarily, can be anything from 30 minutes to 8 hours. A poison which leaves an animal immobilised, but conscious and slowly dying for anything up to 8 hours is anything but 'humane'.

**Suffering:** The lag period is likely to be associated with minimal suffering, however after the onset of clinical signs when cats cannot coordinate body movements it is likely that they will experience some distress, confusion and anxiety as they cannot perform normal behaviours (e.g. standing, moving, feeding, drinking, defensive and escape behaviours). Lethargy and weakness are also potential sources of distress. In addition—during the later phase of toxicosis when cats are unable to move but are still conscious—if they were not able to seek appropriate shelter prior to becoming incapacitated, they are at increased risk of predation (e.g. from crows, other predators), aggression (e.g. from dogs) and environmental exposure, which could lead to further distress and suffering.

End Quote:

When sufficient beloved companion Cats have been killed by Connovation's Cat poison that the public become aware of it, social unrest will be an inevitable consequence. This could conceivably involve outraged citizens interfering with bait stations and the associated risks of such action if PAPP were to be deployed in urban and residential areas.

Our best suggestion when it comes to the inhumane Cat poison PAAP is that the council totally reject the usage of it

## Potential Adverse Ecological Consequences Of Removing Cats



Which is better for the environment? Pest control the old fashioned way via the good efforts of our Feline friends? Or the scourge of biological warfare via the RHVD virus?

### The Mesopredator Release Effect

In truth, Cats as the apex predator are valuable assets who contribute to the control of rodents, rabbits 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 an explosion of the rat population which in turn has had a marked adverse



impact on birdlife. In 2013 in Raglan, persons known to be native bird 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 the environmentalist movement 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, we have seen 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)

### The Vacuum Effect

Engage in the removal of Cats from a locality and one may also be 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' and an article from Science Alert which demonstrates the vacuum effect in action in Tasmania.

### Recommendations

- \* Collective lobbying conducted via online templates be considered inadmissible.
- \* Totally reject the prospect of total bans on companion Cats anywhere within the region.
- \* Totally reject the idea of compulsory microchipping and registration because microchips are proven to be prone to failure. Additionally, compulsory microchipping would be impossible to fully enforce and unenforceable legislation is viewed as being legally 'unreasonable' by the courts thus it is prone to being overturned via the process of judicial review.
- \* Do not embrace the arbitrary term 'pest Cats', stick with the three definitions of Cats as defined under the Companion Cats Code of Welfare 2007. Usage of the term 'pest Cats' will inevitably result in legal challenge.
- \* Biodiversity staff need to purge themselves of the 'kill them all' approach, because by going down that path they may do more harm to an ecosystem than good. Remove the Cats and a plague of rats who will do more damage to bird life than any number of Cats is a certainty.
- \* Do not waste ratepayer funds hiring private pest control operatives, to deal with the alleged problem with Cats. These people are professional killers who delight in dispensing death and are highly unlikely to engage themselves in ethical live capture activity.
- \* Totally reject the usage of the inhumane Cat poison PAPP.

Do you really want the blood of these beautiful highly sentient beings on your hands?



"If you have men who will exclude any of God's creatures from the shelter of compassion and pity, you will have men who will deal likewise with their fellow men" - St Francis of Assisi

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 2:40:58 AM

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P303

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

B

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

nunya

**Postal Address**

No Answer

**Email**

No Answer

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest



Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I don't agree with the controls you are trying to put in place. I have A cat... my cat is neither feral or stray. Cats are not a problem here in Dunedin, or in New Zealand at all.... Dogs (more to the point dog owners who haven't raised them correctly) are more of a problem. However, even those problems would never be accepted if it was suggested dogs should be culled off. I think the people in power should be culled off sometimes, but that doesn't make it ok to go and do. Feral cats keep to themselves and if I am forced to be cruel to my cat because I cannot let it be a cat then I am not ok with that and no amount of convincing is going to make me and many others change their minds about this. There will be uproar, and there will be chaos if this goes through... bare in mind if peoples cats get killed, because of your unwillingness to consider peoples pets while making your wild suggestions, you are still legally liable for damages as in the eyes of the law, a pet is someones property, so be prepared this is not going to go down well with over half of Dunedin. So, PLEASE... leave the cats out... Feral cats do us no harm leave them be.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 2:29:54 AM

P304

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Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Jason Cornell

**Organisation submission is on behalf of (if applicable)**

No Answer

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**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

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**

Yes

**Signature**

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**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I am opposed to cats being classed as pests. As a cat owner, I am afraid that the council's animal control officers will capture and kill any cat they find that is not microchipped or wearing a collar and they will most likely just use that as an excuse to say they thought the cat was feral. And I know they will have no compassion or sympathy for those people whose cats the council mistakes for feral. In the 6 years I have lived in Dunedin I am yet to see even a single feral cat. I believe those on the council who are in favour of this heartless idea of deeming cats a pest, well they're just cat hating assholes who will use it as an excuse to kill any cat who wanders off the property on which they live! If I see any animal control or council bastards go near any of the cats in my neighbourhood they should be warned I will not stand idly by and allow them to touch any cat. So, prepare for an uprising council.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 2:08:56 AM

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P305

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Geoffrey Barnett

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

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**Postal Address**

58 Bennett Rd

**Email**

geoffreybarnett@hotmail.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

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Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I am strongly opposed the plan to widen the number of species of animals considered pests to include feral cats and hedgehogs. I am someone who feeds and cares for a large number of stray cats around Dunedin. They do not have a home apart from the streets and no-one to love and care for them apart from me. They have been desexed by me at no cost to the city. I pay for their food out of my own pocket. My concern is that if feral cats are made pests, how could I be sure that the cats I care for would not be targeted either deliberately or accidentally. They do not have a home, are wary of most humans and probably wander into nearby bush, but they are NOT feral and are NOT pests. Do not change the council policy until you can guarantee me some stray cats would not become victims. And as that is impossible to guarantee, please do not change your policy. Thankyou

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 12:07:06 AM

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P306

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Stephanie Ripley

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

03 473 6214

**Postal Address**

48 Allenby Avenue, Liberton, Dunedin 9010

**Email**

No Answer

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest



Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

1. Section 4.1. - Organisms declared as pests - Hedgehog My submission is that: I oppose having hedgehogs included as a pest as the harm they can cause is little in comparison to all the other pest animals mentioned and the benefits of managing the pest would not outweigh the costs. See your own explanation for how you decide what plants and animals to include from your web page: "Plants and animals are assessed against criteria set out by law, including how much harm they can cause, where they are (distribution) and their potential to spread. A cost benefit analysis is undertaken to make sure the benefits of managing the pest would outweigh the costs. Not all pests can be in the plan and we need to be smart about the pests we choose to manage so we can provide the biggest benefit to our region. Certain pest species may already be managed by a different agency, or might be better suited to a different management approach." I would like you to not include Hedgehog as a pest in the 10 year plan.

2. Section 4.1. - Organisms declared as pests - Rook: My submission is that: The Rook seems to be included mainly because it is a non native species and because there are only 40 birds left and not because it is particularly harmful to flora or fauna. It is also beneficial by reducing harmful insects like grass grubs and reduces flies. It is also useful as a carrion eater. This intelligent bird is a welcome addition to New Zealands sparse large bird fauna. I would like you to not include Rooks as a pest in your 10 year plan.

3. Section 4.1. - Organisms declared as pests - Wilding Conifers: My submission is that the benefits of managing wilding conifers is not outweighing the costs. In other words: It is a waste of money. It is also quite clear from reading Section 6.3.4. that the aesthetics are the main reason for the wilding conifers to be included. This is something which is subjective. Therefore these are not good enough reasons to have wilding conifers managed as a pest in form of a widespread progressive containment. I would like wilding conifers to be site-led, instead of progressive containment. The local population should be able to have a say in this and partly finance it as they are mainly benefitting from it.

4. Section 4.1. - Organisms declared as pests: My submission is that domestic cats should be included as a pest and managed. I like the ORC to fund desexing programmes and microchipping of domestic cats.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 12:00:09 AM

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P307

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Hanny Pantiasih

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

7773018

**Postal Address**

98 Forbury Rd

**Email**

johanpenta@yahoo.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

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**

Yes

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I disagree with cats categorized as pest. I have come across of hundreds of cats, stray, domestic, and feral. It is not possible to tell a different between them in a day or two. Domestic cats can go 'feral' if trapped, in pain or frightened. Chips sometimes go missing or failed.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Kevin Voges](#)  
**To:** [Pests](#)  
**Subject:** ORC RPMP submission  
**Date:** 14 December, 2018 11:28:42 AM

P308

#### Name

Kevin Voges

#### Email

[kvoges@me.com](mailto:kvoges@me.com)

#### Phone Number (Mobile)

0272215607

#### 4.1 Table 2 Organisms declared as pests

I support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats.

I suggest council accepts the list of animal pests as listed in the plan.

#### 6.4 Pests to be managed under sustained control programmes

In the coming years as OSPRI withdraws their possum control from areas, where TB has been removed, ORC will need to have its own plan for possum control. Possums have a huge impact on our native flora and fauna so their control is necessary for both biodiversity reasons as well as vectors for TB

I would like to see the addition of possums to the list of pests to be managed under sustained control programmes. And for the ORC to have a plan for possum control across the region. The plan should include objectives such as Residual Trap Catches (RTCs) and rules for land occupier responsibility. Possum control across the region needs a plan similar to that used for rabbits.

I suggest the Council adds possums to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.

#### Description of Feral cats p.64

I support the inclusion of feral cats for site-led control. Cats, whether owned or unowned, are highly skilled hunters and very destructive to our native wildlife. Cats are an apex predator in New Zealand, meaning that if humans don't control them then nothing else will.

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. Microchipping is the most definitive way to differentiate between an owned and unowned cat. Controlling cats near populated areas, such as Broad Bay and Portobello on the Otago Peninsula, is difficult if you are unable to clearly identify an owned or unowned cat. Requiring all owned cats to be microchipped protects them from being incorrectly identified as unowned cats.

I would like Council to rename "feral cats" to "pest cats" to ensure all cats are clearly defined in the plan and so unowned stray cats can also be controlled. I would like Council to define a pest cat as "a cat without a registered microchip". This allows pest cats to be managed at sites where owned domestic cats may be present.

#### Inclusion of other animal pests

I support the inclusion of hedgehogs, mustelids and rats as site led pests. All these species have significant impact on our native biodiversity and need to be controlled, especially in areas with significant native ecosystems.

Council should accept the list of animal pests especially the inclusion of hedgehogs, mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control.

#### **6.5.4 Site-led programmes on the Otago Peninsula**

I support the site-led programme for the Otago Peninsula and support the objectives, principle measures and rules set out in table 26 to accomplish this.

There is no mention of releasing or abandoning cats into this area. I would like Council to include pest cats in Plan Rule 6.5.4.1.

#### **6.5.5 Site-led programmes at West Harbour – Mt. Cargill area**

I support the site-led programme for West Harbour - Mt. Cargill and support the objectives, principle measures and rules set out in table 27 to accomplish this.

There is no mention of releasing or abandoning cats in this area. I would like Council to include pest cats in Plan Rule 6.5.5.1.

#### **6.5.6 Site-led programmes on Quarantine and Goat Islands**

I support the site-led programme for Quarantine and Goat Islands and support the objectives, principle measures and rules set out in table 28 to accomplish this.

#### **Are there any other comments you would like to provide on the proposed Regional Pest Management Plan?**

There is no mention of feeding cats or establishing cat colonies on council land or on private land without the express permission of the land owner. Several councils around the country have introduced measures to prevent the establishment of cat colonies and I think this is an important inclusion in the plan.

For example in GWRC's proposed RPMP rule which states:  
"No person shall feed or provide shelter to pest cats on private or public land within the Wellington Region, without the permission of the occupier." I suggest ORC also includes a similar provision in their RPMP.

The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.

#### **Please choose one of the following options regarding the public hearing**

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

## **Submission to ORC on Proposed 10-year Regional Pest Management Plan and Proposed Biosecurity Strategy**

A & N Brown

83 Timaru Creek Road  
RD2, Wanaka 9382  
brown.hawea@actrix.co.nz

We do not wish to be heard

This submission refers particularly to the addition of new pests in ORC's Proposed 10 year Regional Pest Management Plan and Proposed Biosecurity Strategy. We are very pleased to see that Russell Lupins have been added to the list in section 4.1.

We are permanent residents of John Creek, the settlement in the eastern corner of Lake Hawea; John Creek bisects the settlement. This year the lupins completely fill the creek bed (90% of the year it runs dry) from above the light traffic bridge to the high water mark of the lake, a distance of around 200metres. They also cover most of the high banks as well.

Lupins are also growing on the lake bed from the 342masl mark, the current level of the lake to above the high water mark (346masl).

In addition Russell lupins and the yellow tree lupins (*lupinus arboreus*) cover sections of the creek reserve where native vegetation is attempting to grow. If not contained the natives will be smothered. Lupins also make good cover for rabbits which are plentiful around John Creek.

Property owners are not attempting to grow Russell lupins but some are experiencing incursions from the wild Russell lupins .Lupins are not just on the road sides of the settlement but are also spreading up the lake on Timaru Creek Road.

The policy talks about Good Neighbour rules. At John Creek the 'neighbours' are the Crown and the QLDC.

We support the addition of Russell lupins to the list of new pests.

We request the Good Neighbour rules be added to the policy for wild Russell lupins.

We urge positive action to reduce/remove the lupin infestation at John Creek. We would be concerned, however if any spraying involved toxins that could enter the waterways, either the creek or the lake.





Photo 1: Russel lupins and tree lupins in John Creek reserve



Photo 2: Lupins in John Creek lake shore to water level



Photo 3: Lupins in John Creek taken from roadside



Photo 4: Lupins on lake front looking east

**Submission on Draft Otago Regional Council Biosecurity Strategy & Proposed Regional Pest Management Plan**

To: Submission on Draft Biosecurity & Pest Management Plans  
Otago Regional Council  
Private Bag 1954,  
Dunedin

**SUBMITTER DETAILS**

**Yellow-eyed Penguin Trust**

Contact Person: David McFarlane

Email: [fieldmanager@yeptrust.org.nz](mailto:fieldmanager@yeptrust.org.nz)

Postal Address: PO Box 5409  
Dunedin 9058

Phone Number: 479 0011

Mobile Number: 021-479-116

**TRADE SUBMISSION**

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

**HEARINGS**

We would like to be heard in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

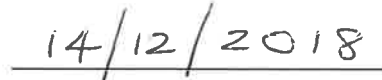
## SUBMISSION DETAILS

Please see attached



Signature of submitter

Date



(or person authorised to sign  
on behalf of submitter)

### Specific Submissions

The Trust would like to comment on the following parts of the Biosecurity Strategy and Proposed Regional Pest Management Plan.

In both cases, as a land manager the Yellow-eyed Penguin Trust (hereafter the "Trust") has a particular interest in and commitment to tackling biosecurity and pest threats as part of our commitment to coastal biodiversity conservation.

#### Biosecurity Strategy

The Trust supports the Biosecurity Strategy and appreciates the description (p.9) of the biodiverse nature of the Otago region, and the threat posed by pest plants and animals.

#### Proposed Regional Pest Management Plan

##### 1.3 Duration (p.3)

The Trust would prefer that the RPMS is subject to review after 5 years as it is quite likely that the pest scene in Otago will change, including new pest species being identified . Flexibility in dealing with potential new threats is key to a successful plan.

Failure to deal with weeds at an early stage in their invasion / naturalisation cycle is exemplified by the advance of Darwin's barberry into the Catlins over the last twenty years.

#### Part Two: Pest Management

##### 4. Organism Declarations

###### 4.1 Organisms Declared As Pests

###### Plant pests

We support the list of pest plants, in particular Banana passionfruit, Bomarea, Chilean flame creeper, Darwin's barberry, Old man's beard, sycamore, gorse and broom - all species which can be of concern in coastal settings.

However we note that Japanese knotweed (*Fallopia japonica*) - currently a weed of restricted distribution is omitted. Given its potentially disastrous impact, based on overseas experience, we ask that this species is declared a pest and subject to an eradication programme.

We also recommend the addition of aluminium plant (*Lamium galeobdolon*) to the list of pest plants. This is another shade tolerant species capable of penetrating native bush and preventing germination of native seeds, similar to *Tradescantia*

With reference to Appendix 1 Organisms of Interest the Trust believes that boxthorn (*Lycium ferocissimum*) should be elevated to Table 2 Organisms classified as pests. Boxthorn is a particular issue on dry coastal sites, including Cape Wanbrow (Oamaru), Moeraki and parts of Otago Peninsula and can become a barrier to wildlife accessing breeding and roosting areas.

In addition we note the absence of any marine plant or animal pests in the RPMS despite the 660,000 hectares of coastal sea (out to the 12 NM mark) administered by the Otago Regional Council. If these are more appropriately covered under the ORC Coast Plan this should be made clear in the introduction to the RPMS, although we note that currently this plan does not appear to address pests as such.

### **Animal pests**

We note and support the list of pest animals, especially feral cats, feral pigs, hedgehogs, mustelids, possums and rats.

The threat of feral pigs to Otago's biodiversity cannot be underestimated and at several sites in the Catlins yellow-eyed penguins are affected by probable pig predation or disturbance.

Feral cats are a particular concern for the Trust as at several important hoiho breeding sites (eg Otago Peninsula) cats are regularly dumped and augment the existing wild population. In other cases domestic cats are potentially able to wander into breeding areas. The Trust urges the Otago Regional Council to support investigations by territorial authorities, such as the Dunedin City Council into registering and microchipping domestic cats.

## **6. Pest Descriptions and Programmes (p.26)**

While supportive of the pest management programmes proposed (exclusion to site-led pest programmes) the Trust urges consideration of terrain features when prioritising and planning particular control work on plant pest species.

Coastal cliffs and bluffs are a common feature of the Otago coast line and present significant challenges for controlling yet alone eradicating plant pests. Once species such as gorse and Cape ivy have successfully established they are virtually impossible to remove.

The Trust asks that in any plant pest management programme work involving coastal sites, priority is given to first dealing with plant pests threatening any coastal cliffs present.

### **6.5 Pests to be Managed Under Site-Led Programmes**

The Trust supports the identified site-led programmes, in particular the Otago Peninsula but advocates for the possible future inclusion of other sites. In the Catlins (Long Point - Irahuka and the Tautuku Basin) for example, significant investment is being made by the Trust and Forest & Bird respectively, in conservation of a significant oceanic headland and a large (6,000ha plus) forest basin.

We ask that the RPMS identify a process whereby other site-led programmes can be established in the future.

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 10:47:01 AM

P311

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Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Karen Anderson

**Organisation submission is on behalf of (if applicable)**

n/a

**Contact phone**

[REDACTED]

**Postal Address**

[REDACTED]

**Email**

[REDACTED]

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

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**

No

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

Please see attached document.



**Please attach your submission or any supporting pictures or documents.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/d25f79027695aa53010621a0aa8944f0ba688454/file\\_answers/files/028/848/463/original/Karen\\_Anderson-Submission.pdf?1544737610](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/d25f79027695aa53010621a0aa8944f0ba688454/file_answers/files/028/848/463/original/Karen_Anderson-Submission.pdf?1544737610)

**SUBMISSION ON THE PROPOSED REGIONAL PEST  
MANAGEMENT PLAN FOR OTAGO**

P312

**To:** Proposal for a Regional Pest Management Plan for Otago  
Otago Regional Council  
70 Stafford Street  
Private Bag 1954  
**DUNEDIN 9054**

**Sent by email to:** [pests@orc.govt.nz](mailto:pests@orc.govt.nz)

**Submitter:** Land Information New Zealand  
C/- Boffa Miskell Ltd  
PO Box 110  
**CHRISTCHURCH 8140**

Attention: Marcus Girvan, Project Manager, LINZ Biosecurity  
Phone: 03 364 4760  
Mobile: 027 276 9244  
Email: [marcus.girvan@boffamiskell.co.nz](mailto:marcus.girvan@boffamiskell.co.nz)

Land Information New Zealand ("LINZ") submissions on the Proposed Regional Pest Plant Management Plan ("the plan") are set out in the **attached** document.

LINZ would like to be heard in support of its submissions.



---

**David Mole**  
Senior Portfolio Manager Biosecurity  
Land Information New Zealand  
Private Box 5501  
**WELLINGTON 6145**

Dated this 14th day of December 2018.

## Introduction

Land Information New Zealand (LINZ) administers almost 2 million hectares of land owned by the Crown, which is approximately 8% of New Zealand's total land area. LINZ's portfolio includes 1.6 million hectares of high country pastoral land in the South Island, as well as river and lake beds.

LINZ undertakes biosecurity control on unoccupied Crown land. Historically the Crown has not been bound by pest management rules under the Biosecurity Act 1993, and Pest Management Plans. LINZ has however voluntarily undertaken biosecurity control to ensure the Crown acts as a responsible landowner and good neighbour.

LINZ's biosecurity control programme focuses generally on the exclusion, eradication, and management of exotic pest plants and animals on unoccupied land such as river and lake beds. LINZ's biosecurity programmes contribute to protecting primary industries on neighbouring land, and improved biodiversity outcomes by protecting and allowing native species to regenerate. LINZ works with landowners, local authorities, community groups, and other relevant agencies to ensure its biosecurity programmes are prioritised and coordinated to achieve the maximum benefit.

Pest species currently managed by LINZ on unoccupied Crown land in the Otago region under its control programme include gorse and broom, old man's beard, *Lagarosiphon major*, rabbits, *Pinus contorta*, and other wilding tree species.

Recent amendments to the Biosecurity Act 1993 introduce changes which place a greater responsibility on the Crown to manage biosecurity risks. In particular, it provides for the ability for 'good neighbour' rules to be included in Regional Pest Management Plans which bind the Crown.

LINZ has a particular interest in the review of the Otago Regional Pest Management Plan in recognition of the potential implications for the future management of unoccupied Crown land by LINZ. It also has an interest in the implications for the management of all occupied Crown land.

LINZ in particular wishes to ensure that the pest management obligations placed on LINZ and lessees of Crown land are appropriate to the level of biosecurity risk and values to be protected and are cost effective to implement. While at the same time ensuring proposed pest management approaches will be appropriate in managing potential spread onto Crown land.

LINZ overall supports the direction and provisions of the Proposed Regional Pest Management Plan for Otago, except where detailed in the specific submissions in the attached table.

## Submissions

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
<b>Part 2: Pest Management</b>		
<b>Section 4.1 Organisms declared as pests and Table 2.</b>	<p>LINZ submits that the following species should be added to Table 2:</p> <ul style="list-style-type: none"> <li>• Egeria (<i>Egeria densa</i>)</li> <li>• Hornwort (<i>Ceratophyllum demersum</i>)</li> </ul> <p>The primary programme for egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should be exclusion from the Otago region.</p>	<ol style="list-style-type: none"> <li>1. Retain the list of organisms classified as ‘pests’ in Section 4.1: Table 2.</li> <li>2. Add the following species to Table 2: <ul style="list-style-type: none"> <li>• Egeria (<i>Egeria densa</i>)</li> <li>• Hornwort (<i>Ceratophyllum demersum</i>)</li> </ul> </li> <li>3. The primary programme for egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should be exclusion from the Otago region.</li> </ol>
<b>Definition of ‘wilding conifer’, and Table 3 – introduced conifer trees</b>	<p>LINZ supports the definition of ‘wilding conifer’ in the Plan, and the related list of introduced conifer trees set out in Table 3. LINZ supports the inclusion of naturally occurring <i>Pinus radiata</i> and Douglas fir in Table 3.</p> <p>LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, water yield and production values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to progressively contain and reduce wilding conifers in Otago, in support of the National Wilding Conifer Management Strategy 2015 – 2030.</p>	<ol style="list-style-type: none"> <li>1. Retain the definition of ‘wilding conifer’, and the list of introduced conifer trees in table 3.</li> </ol>
<b>Section 4.2 – Pest agents</b>	<p>LINZ supports the definition of wild Russell lupin as a ‘pest agent’ in section 4.2.</p> <p>LINZ submits that conifers should be defined as ‘pest agents’ in section 4.2 and that there should be pest agent rules included in the proposal to ensure the success of the related pest objective for wilding conifers.</p>	<ol style="list-style-type: none"> <li>1. LINZ supports the definition of wild Russell lupin as a ‘pest agent’ in section 4.2.</li> <li>2. Define conifers as a ‘pest agent’ in section 4.2:</li> </ol> <p>“Pest agent rules are included in the Proposal to ensure the success of the related pest objective for wild Russell lupin <i>Lupinus polypyllus</i> and for wilding conifers (<i>Pinus muricata</i>, <i>Pinus contorta</i>, <i>Pinus nigra</i> <i>Pseudotsuga menziesii</i>, <i>Larix decidua</i>, <i>Pinus pinaster</i>, <i>Pinus muco</i> and <i>P.uncinata</i>, <i>Pinus</i></p>

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
		<p><u><i>ponderosa, Pinus radiata, Pinus sylvestris and any introduced conifer species that is capable of helping the spread of wilding conifers, and is not located within a plantation forest).</i></u></p> <p>3. Include a pest-agent rule for conifers.</p>
<p><b>Section 4.3 Other organisms that may be controlled, and Appendix 1 – organisms of interest</b></p>	<p>LINZ supports in part the list of organisms of interest in Appendix 1 and the inclusion of invasive tree weed species that are becoming prevalent, particularly in the high country, including rowan (<i>Sorbus aucuparia</i>). LINZ also considers that silver birch (<i>Betula pendula</i>) and white poplar (<i>Populus alba</i>) should be added to the list of organisms of interest.</p> <p>LINZ considers that egeria (<i>Egeria densa</i>) should be classified as a pest and be subject to controls in the Plan. Accordingly, LINZ considers that egeria (<i>Egeria densa</i>) should be removed from the list of 'organisms of interest'.</p>	<ol style="list-style-type: none"> <li>1. Amend the list of organisms of interest in Appendix 1 to include Silver Birch (<i>Betula pendula</i>) and White Poplar (<i>Populus alba</i>).</li> <li>2. Remove egeria (<i>Egeria densa</i>) from Appendix 1 and classify as a pest species.</li> </ol>
<p><b>Section 6.1 Pests to be managed under exclusion programmes</b></p>	<p>LINZ supports the pests to be managed under the exclusion programme, as listed in Table 4 and described in Table 5. In addition, LINZ considers that egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should also be managed under the exclusion programme.</p> <p>LINZ considers that egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should be precluded from establishing in the region.</p>	<ol style="list-style-type: none"> <li>1. Add egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) to Table 4 as a pest to be included in exclusion programmes.</li> <li>2. Add a description of egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) and their adverse effects to Table 5 Characteristics and threats of pests in exclusion programmes.</li> <li>3. Add egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) to Plan Objective 6.1.3.</li> </ol>
<p><b>Section 6.2 Pests to be managed under eradication programmes.</b></p>	<p>LINZ supports the reduction of all infestations of Bennett's wallaby, rooks and spiny broom to zero levels within the Otago region.</p>	<ol style="list-style-type: none"> <li>1. Retain Plan Objective 6.2.3 and Plan Rules 6.2.3.1 – 6.2.3.4.</li> </ol>
<p><b>Section 6.3.2 Pests to be managed under progressive containment programmes by occupiers</b></p>	<p>LINZ supports Plan Objective 6.3.2 and Plan Rule 6.3.2.6 that require the progressive containment of the geographic distribution and extent of old man's beard.</p>	<ol style="list-style-type: none"> <li>1. Retain Plan Objective 6.3.2 and Plan Rule 6.3.2.6.</li> </ol>

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
<p><b>Section 6.3.2 Good Neighbour Rule for old man's beard</b></p>	<p>LINZ submits that a Good Neighbour Rule is required to achieve progressive containment of old man's beard.</p>	<p>1. Add the following Good Neighbour Rule to Section 6.3.2</p> <p><u>Note: This is designated as a Good Neighbour Rule</u></p> <p><u>All occupiers shall, on receipt of a written direction from an Authorised Person, destroy all old man's beard infestations on the land that they occupy within 20 metres of the property boundary where the occupier of the adjoining property has destroyed, or is destroying, old man's beard infestations within 20 metres of the boundary between the properties.</u></p> <p><u>A breach of this rule creates an offence under section 154N(19) of the Act.</u></p>
<p><b>Section 6.3.4 Progressive containment programme for wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch</b></p>	<p>LINZ supports Plan Objective 6.3.4 and Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 that require the progressive containment and reduction in the geographic distribution and extent of wilding conifers.</p> <p>LINZ considers that wilding conifers are one of the highest priority pest management issues facing the region. Wilding conifers impact on biodiversity, aesthetic, cultural, and production values. LINZ is actively supporting and assisting funding the delivery of the National Wilding Conifer Control Programme to progressively contain and reduce wilding conifers in Otago, in support of the National Wilding Conifer Management Strategy 2015 – 2030.</p>	<p>1. Retain Plan Objective 6.3.4 and Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3.</p>
<p><b>Plan Rule 6.3.4.3</b></p>	<p>LINZ supports this Good Neighbour Rule but recommends amendments to the wording for clarity and consistency. The term 'destroy' is defined in the glossary and should be used in preference to 'manage' in this rule.</p>	<p>1. Amend the wording of Plan Rule 6.3.4.3:</p> <p><u>Within the Otago Region occupiers shall destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch present on land they occupy within 200m of an adjoining property boundary prior to cone bearing where –</u></p> <p>a) <u>the adjoining land has previously been cleared through control operations since January 2016; and</u></p> <p>b) <u>the occupier of that adjoining land is taking reasonable steps to <del>manage</del> destroy wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch on their land, within 200m of the boundary.</u></p>

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
<p><b>Section 6.3.4 Pest Agent Rule for Conifers</b></p>	<p>LINZ submits that a pest agent rule is required to implement progressive containment and reduction in the geographic distribution and extent of wilding conifers.</p>	<p>1. Add a pest agent rule to Section 6.3.4</p> <p><u>Note: This is a pest agent rule</u></p> <p><u>“Within the Otago region occupiers shall, on receipt of written direction from an Authorised Person, destroy any Pest Agent Conifer that is present on land they occupy within 200m of an adjoining property boundary prior to cone bearing where –</u></p> <p>a) <u>wilding conifers, contorta, Corsican, Scots, mountain or dwarf mountain pines, larch and/or other planted conifer species have been destroyed through control operations on the adjoining property, within 200 metres of the property boundary, since January 2016; and</u></p> <p>b) <u>the control operations were publicly funded (either in full or in part).</u></p> <p><u>A breach of this rule creates an offence under section 154N(19) of the Act</u></p> <p><u>Pest Agent Conifer means any introduced conifer species that is capable of helping the spread of wilding conifers and is not located within a plantation forest.</u></p> <p><u>Explanation: Introduced conifer species that can help the spread of wilding conifers present a risk for wilding conifer management. This rule ensures that over the duration of the Plan new infestations or reinfestation of wilding conifers are prevented at sites where wilding conifers, contorta, Corsican, Scots, mountain or dwarf mountain pines, larch and/or other planted conifer species have previously been destroyed through publicly funded control operations.</u></p>
<p><b>Section 6.4 Pests to be managed under sustained control programmes.</b></p>	<p>LINZ supports the management of broom, gorse, nodding thistle, ragwort and wild Russell lupin under sustained control programmes, and the associated Good Neighbour Rules.</p>	<p>1. Manage broom, gorse, nodding thistle, ragwort and wild Russell lupin under sustained control programmes, and the associated Good Neighbour Rules.</p>

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
<b>Section 6.4.3 Sustained control programme for broom and gorse</b>	LINZ supports sustainable control of broom and gorse to ensure that land that is free of, or being cleared of, broom and gorse does not become reinfested.	1. Retain Plan Objective 6.4.3 and Plan Rules 6.4.3.1 – 6.4.3.4.
<b>Plan Rule 6.4.3.2</b>	LINZ supports this Good Neighbour Rule. An amendment to the wording of the rule is recommended for clarity.	1. Amend the wording of Plan Rule 6.4.3.2: <u>All occupiers outside of the Gorse and Broom Free Areas on rural zoned land shall eliminate broom infestations on their land within 10m of the adjoining property boundary where the occupier of the adjoining property is eliminating broom infestations within 10m of that boundary with the intention of protecting their economic well-being.</u>
<b>Plan Rule 6.4.3.4</b>	LINZ supports this Good Neighbour Rule. An amendment to the wording of the rule is recommended for clarity.	1. Amend the wording of Plan Rule 6.4.3.4: <u>All occupiers outside of the Gorse and Broom Free Areas on rural zoned land shall eliminate gorse infestations on their land within 10m of the adjoining property boundary where the occupier of the adjoining property is eliminating gorse infestations within 10m of that boundary with the intention of protecting their economic well-being.</u>
<b>Section 6.4.4 Sustained control programmes for nodding thistle and ragwort</b>	LINZ supports sustainable control of nodding thistle and ragwort on rural zoned land within specified distances of property boundaries,	1. Retain Plan Objective 6.4.4 and Plan Rules 6.4.4.1 and 6.4.4.2.
<b>Plan Rule 6.4.4.1</b>	LINZ opposes in part this Good Neighbour Rule. The management of nodding thistle within 100m of the property boundary is a significant imposition on land owners and occupiers. An amendment to the rule is recommended.	1. Amend the wording of Plan Rule 6.4.4.1: <u>All occupiers in the Otago region on rural zoned land shall eliminate nodding thistle infestations on their land within <del>100m</del> 50m of the adjoining property boundary where the occupier of the adjoining property is eliminating nodding thistle infestations within <del>100m</del> 50m of that boundary.</u>
<b>Plan Rule 6.4.4.2</b>	LINZ opposes in part this Good Neighbour Rule. The management of ragwort within 50m of the property boundary is a significant imposition on land owners and occupiers. An amendment to the rule is recommended.	1. Amend the wording of Plan Rule 6.4.4.2: <u>All occupiers in the Otago region on rural zoned land shall eliminate ragwort infestations on their land within <del>50m</del> 20m of the adjoining property boundary where the occupier of the adjoining property is eliminating ragwort infestations within <del>50m</del> 20m of that boundary.</u>



Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
<b>Section 6.4.5 Sustained control programme for Russell lupin</b>	LINZ supports the sustainable control of the extent of wild Russell lupin within specified distances from waterways to preclude establishment of wild Russell lupin and to prevent adverse effects on environmental values.	1. Retain Plan Objective 6.4.5 and Plan Rules 6.4.5.1 and 6.4.5.2.
<b>Section 6.4.6 Sustained control programme for feral rabbits</b>	LINZ supports sustainable control of feral rabbits to ensure population levels do not exceed Level 3 on the Modified McLean Scale.	1. Retain Plan Objective 6.4.6 and Plan Rules 6.4.6.1 – 6.4.6.3.
<b>Plan Rule 6.4.6.2</b>	LINZ supports this Good Neighbour Rule. An amendment to the wording of the rule is recommended for clarity.	1. Amend the wording of Plan Rule 6.4.6.2 <u>An occupier within the Otago region shall, upon receipt of a written direction from an Authorised Person, control feral rabbit densities on their land to at or below Level 3 on the Modified McLean Scale within 500m of the adjoining property boundary where the occupier of the adjoining property is also controlling feral rabbit densities at or below Level 3 on the Modified McLean Scale within 500m of <del>the that</del> boundary.</u>
<b>Plan Rule 6.4.6.3</b>	LINZ supports a prohibition on the discharge of firearms where a control operation involving bait is being planned or undertaken. LINZ submits that the rule should restrict the discharge of firearms prior to the laying of bait.	1. Amend the wording of Plan Rule 6.4.6.3: <u>Other than under the instruction or supervision of an Authorised Person, no person shall discharge a firearm within or across a property <del>prior to where a control operation involving bait is being planned or where a control operation involving bait is being undertaken on the property to manage feral rabbits.</del></u>
<b>6.5.7 Site-led programme for lagarosiphon management areas</b>	Land Information New Zealand takes a lead role in controlling and eradicating lagarosiphon in Otago's lakes and rivers that it administers. LINZ supports Plan Objective 6.5.7 and Plan Rules 6.5.7.1 and 6.5.7.2.	1. Retain Plan Objective 6.5.7 and Plan Rules 6.5.7.1 and 6.5.7.2.
<b>Plan Objective 6.5.7</b>	LINZ submits that the terms 'progressive containment' and 'sustained control' should be used in this objective for clarity and consistency.  LINZ submits that the wording of paragraphs c) and d) of this objective should be amended for clarity.	1. Amend the wording of Plan Objective 6.5.7 Over the duration of the Plan actively manage lagarosiphon to:  a) <u><del>progressively contain lagarosiphon in Lake Wanaka and the Kawarau River (Map 4 in Appendix 3) to reduce its extent over the next 10 years; reduce the extent of lagarosiphon in Lake Wanaka and the Kawarau River (Map 4 in Appendix 3) through progressive containment over the next 10 years.</del></u>

Specific Provision of the Plan	Submission	Decision Sought from the Regional Council
		<p>b) <del>sustainably control lagarosiphon in Lake Dunstan (Map 4 in Appendix 3); implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3).</del></p> <p>c) <del>preclude prevent</del> the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3);</p> <p>d) <del>preclude prevent</del> the establishment of lagarosiphon in lakes, and rivers <del>and tributaries excluding Lake Roxburgh and the Clutha River/Mata-au and its tributaries</del> where it is not already present</p> <p>to avoid, mitigate or prevent effects on the environment, and amenity and recreational values.</p>
<p><b>Appendix 1</b> <b>Organisms of Interest</b></p>	<p>LINZ supports in part the list of organisms of interest in Appendix 1 and the inclusion of invasive tree weed species that are becoming prevalent, particularly in the high country, including rowan (<i>Sorbus aucuparia</i>). LINZ also considers that silver birch (<i>Betula pendula</i>) and white poplar (<i>Populus alba</i>) should be added to the list of organisms of interest.</p> <p>LINZ considers that egeria (<i>Egeria densa</i>) should be classified as an exclusion pest and be subject to controls in the Plan. Accordingly, LINZ considers that egeria (<i>Egeria densa</i>) should be removed from the list of 'organisms of interest'.</p>	<ol style="list-style-type: none"> <li>1. Amend the list of organisms of interest in Appendix 1 to include silver birch (<i>Betula pendula</i>) and white poplar (<i>Populus alba</i>).</li> <li>2. Remove egeria (<i>Egeria densa</i>) from Appendix 1 and classify as a pest species.</li> </ol>

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 10:02:16 AM

P313

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Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Carrie Pritchard

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

021336899

**Postal Address**

41 Kent Street, Arrowtown 9302

**Email**

jase.carrie@gmail.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

No Answer

**Please attach your submission or any supporting pictures or documents.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/bcc46ef6e38f78c5f4e3e80357c278573ec8538c/file\\_answers/files/028/847/696/original/ORC\\_pest\\_management\\_plan\\_submission\\_C\\_Pritchard.docx?1544734925](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/bcc46ef6e38f78c5f4e3e80357c278573ec8538c/file_answers/files/028/847/696/original/ORC_pest_management_plan_submission_C_Pritchard.docx?1544734925)

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 10:02:10 AM

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P314

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Kathryn Jean Guthrie

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

0276445742

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2 Sunbury St, Andersons Bay

**Email**

kateguthrienz@gmail.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

2 Sunbury St, Andersons Bay

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I do not believe stray/homeless/lost/abandoned cats should be delegated as a pest species. They are not feral. They can be neutered and tamed (I have done so several times). The issue is in rehoming them. Support should be given to volunteer groups (Cat Rescue, SPCA) who are willing to take on this responsibility, with priority for live trapping/rescue in high sensitive wildlife areas, education about not abandoning unwanted pets, subsidised neutering programmes and more willingness by agencies to take unwanted kittens without condemnation if the owner can show the mother cat has now been spayed. Defining all 'strays' as pests is unwittingly giving a segment of our community social licence to shoot (airguns etc) and poison (antifreeze) any cat that wanders into their backyard. They are not saving wildlife (and probably don't care about wildlife) - they are using pets for target practice. Don't unwittingly support the loons and hoons in our community in this behaviour. It's very rewarding to rescue a stray - let's encourage more people to care about cats and do so, not condemn their compassion with legislation. Also, don't legislate in future to limit how many cats someone can have, so long as those cats are neutered, cared for and not a neighbourhood nuisance. Educate people about how they can keep cats indoors (and save on vet bills too!).

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 9:52:48 AM

P315

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Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Andrew Davis

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

0276562232

**Postal Address**

231 Arrowtown Lake Hayes Road, Queenstown

**Email**

andrew.davis@partnersgroup.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

No Answer

**Please attach your submission or any supporting pictures or documents.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/e991eacd52b2f3e3cb80049e5e8d65374a915ecc/file\\_answers/files/028/847/528/original/ORC\\_pest\\_management\\_plan\\_submission\\_A.\\_Davis.docx?1544734357](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/e991eacd52b2f3e3cb80049e5e8d65374a915ecc/file_answers/files/028/847/528/original/ORC_pest_management_plan_submission_A._Davis.docx?1544734357)

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 9:38:49 AM

P316

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Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Yolanda van Heezik

**Organisation submission is on behalf of (if applicable)**

Zoology Department, University of Otago

**Contact phone**

03 479 4107

**Postal Address**

Zoology Dept, PO Box 56, Dunedin 9054.

**Email**

yolanda.vanheezik@otago.ac.nz

**Contact name for service of person making submission (if different from above)**

N/A

**Postal address for service of person making submission (if different from above)**

N/A

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

The specific provisions my submission relates to are the following organisms declared as pests: hedgehogs, feral cats, mustelids, rats (all 3 species), brushtail possum, introduced conifers, deer, pig, goats, rabbits. I support these provisions. Hedgehogs, feral cats, mustelids, rats and possums are all significant predators of native wildlife; there is a large body of evidence to support this. Introduced conifers (wilding pines) cause a loss of native biodiversity and destroy indigenous landscapes. Deer, pigs and goats through browsing and habitat disruption result in significant negative impacts on native biodiversity. Rabbits not only cause erosion but are the primary prey of introduced mammalian predators (mustelids, cats), maintaining them at high levels in the environment. Regarding cats, the ORC has limited it's scope to feral cats. I suggest it should consider extending this provision to include stray cats. These can exist in colonies that are sometimes supported by well-meaning members of the public who do not want to take on the full responsibility of cat ownership. Although fed, these cats still prey on wildlife. They also spread disease which has been shown to have negative impacts on both native species, including marine species, and human health. Many cat advocates propose trap/neuter/return (TNR) as a method of controlling the growth of these colonies, ultimately reducing their size. There are a large number of studies that demonstrate that TNR is not effective and does not address issues of disease and predation of wildlife. I am happy to provide scientific literature to support these assertions. The outcomes that I would like to see the ORC make regarding all these provisions is to include these species as pest species in their pest management plan, but also to consider the inclusion of stray cats.

**Please attach your submission or any supporting pictures or documents.**

No Answer



**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 9:31:11 AM

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P317

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Katrina Sharples

**Organisation submission is on behalf of (if applicable)**

No Answer

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**Email**

katrina.sharples@gmail.com

**Contact name for service of person making submission (if different from above)**

Katrina

**Postal address for service of person making submission (if different from above)**

367 Stuart Street

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

Over the months of September October I have noticed rapidly increasing amounts of Darwin's Barberry in the Catlins. I understand this plant is listed as a pest, and am very concerned that it is getting out of control in that area. I think it is very important that the plan for control of this pest should be extended to include the Catlins region, particularly given this is an important tourist destination in Otago famed for its beautiful native bush and beaches. A group in the Catlins have been working hard on the control in some areas, but the extent of the task is beyond them.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 9:27:52 AM

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P318

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Ben Teele

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

0224384552

**Postal Address**

413 McDonnell Road, RD1, RD1

**Email**

benteele@mac.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

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**

Yes

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

No Answer

**Please attach your submission or any supporting pictures or documents.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/afd47b73f5998714b13ba20a20fcbdcdef0b0249/file\\_answers/files/028/847/145/original/ORC\\_pest\\_management\\_plan\\_submission\\_B\\_Teele.pdf?1544732861](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/afd47b73f5998714b13ba20a20fcbdcdef0b0249/file_answers/files/028/847/145/original/ORC_pest_management_plan_submission_B_Teele.pdf?1544732861)

**From:** [Bunty Condon](#)  
**To:** [Pests](#)  
**Cc:** [Bunty Condon](#)  
**Subject:** SurveyTool - Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 8:50:14 AM  
**Attachments:** [Cats - Culling Cats Increases their Numbers.docx](#)

P319

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Re: Otago Regional Council via (<http://yoursay.orc.govt.nz>)

Please note that your submission form is completed but it would not submit because it won't upload my attachment. I resubmitted without attachment and this has succeeded. See attachments are here. Because of the malfunctioning on your online submission form, I resent the huge amount of additional time this has caused me to spend on this important submission.

\*\* I totally endorse Feline Rights and their submission also attached.

Please understand this is very serious and all information provided is true and factual.

Do NOT cause and create the suffering, maiming and death of cats. They help people AND the birds !

The increasing suffering and cruelty and deaths of beloved family pet cats is increasing BECAUSE Councils are trying to wrongly accuse them and call them pests.

CATS ARE NOT pests !!!!

\*\* Auckland Councillors have decided NOT to classify cats as pests. Very sensible !

Thank you.

Yours sincerely,  
Sandra J. Condon

BEC CREW 8 APR 2015

## **Culling Feral Cats Actually Increases Their Numbers, New Study Finds**

**Killing them only makes them stronger.**

A new study has found that trapping and culling might not be the best solution to Australia's feral cat problem - the practice can actually cause an increase in their numbers.

See full report: <https://www.sciencealert.com/culling-feral-cats-may-actually-increase-their-numbers-study-suggests>

**From:**  
**To:** Cats are Family  
**Subject:**  
**Date:**  
**Attachments:**

---

Cats are NOT pests !!! Cats are Family.

See below an example of the public outrage of cats being treated as a pest and killed.

Cats are NOT the killers of birds as claimed. Cats ARE very effective killers of rats, mice and mustelids. People and birds NEED their services.

DO NOT KILL ANY cats !!!!! They are NOT pests !!!!!

This submission includes a link to Facebook that includes private information. The link has been withheld.

**From:** [Bruce Jefferies](#)  
**To:** [Pests](#)  
**Subject:** ORC RPMP submission  
**Date:** 14 December, 2018 8:47:56 AM

P320

#### Name

Bruce Jefferies

#### Organisation Name (If submission is on behalf of an organisation)

stems

#### Email

[brucejefferies@xtra.co.nz](mailto:brucejefferies@xtra.co.nz)

#### Phone Number (Mobile)

+6434437454

#### 4.1 Table 2 Organisms declared as pests

I support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. Hares, and hedgehogs need to be included

#### 6.4 Pests to be managed under sustained control programmes

In the coming years as OSPRI withdraws their possum control from areas, where TB has been removed, ORC will need to have its own plan for possum control. Possums have a huge impact on our native flora and fauna so their control is necessary for both biodiversity reasons as well as vectors for TB

I would like to see the addition of possums to the list of pests to be managed under sustained control programmes. And for the ORC to have a plan for possum control across the region. The plan should include objectives such as Residual Trap Catches (RTCs) and rules for land occupier responsibility. Possum control across the region needs a plan similar to that used for rabbits.

I suggest the Council adds possums to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.

#### Description of Feral cats p.64

I support the inclusion of feral cats for site-led control. Cats, whether owned or unowned, are highly skilled hunters and very destructive to our native wildlife. Cats are an apex predator in New Zealand, meaning that if humans don't control them then nothing else will.

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. Microchipping is the most definitive way to differentiate between an owned and unowned cat. Controlling cats near populated areas, such as Broad Bay and Portobello on the Otago Peninsula, is difficult if you are unable to clearly identify an owned or unowned cat. Requiring all owned cats to be microchipped protects them from being incorrectly identified as unowned cats.

I would like Council to rename "feral cats" to "pest cats" to ensure all cats are clearly defined in the plan and so unowned stray cats can also be controlled. I would like Council to define a pest cat as "a cat without a registered microchip". This allows pest cats to be managed at sites where owned domestic cats may be present.

#### Inclusion of other animal pests

I support the inclusion of hedgehogs, mustelids and rats as site led pests. All these species have

significant impact on our native biodiversity and need to be controlled, especially in areas with significant native ecosystems.

Council should accept the list of animal pests especially the inclusion of hedgehogs, mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control.

#### **6.5.4 Site-led programmes on the Otago Peninsula**

I support the site-led programme for the Otago Peninsula and support the objectives, principle measures and rules set out in table 26 to accomplish this.

There is no mention of releasing or abandoning cats into this area. I would like Council to include pest cats in Plan Rule 6.5.4.1.

#### **6.5.5 Site-led programmes at West Harbour – Mt. Cargill area**

I support the site-led programme for West Harbour - Mt. Cargill and support the objectives, principle measures and rules set out in table 27 to accomplish this.

There is no mention of releasing or abandoning cats in this area. I would like Council to include pest cats in Plan Rule 6.5.5.1.

#### **6.5.6 Site-led programmes on Quarantine and Goat Islands**

I support the site-led programme for Quarantine and Goat Islands and support the objectives, principle measures and rules set out in table 28 to accomplish this.

#### **Are there any other comments you would like to provide on the proposed Regional Pest Management Plan?**

There is no mention of feeding cats or establishing cat colonies on council land or on private land without the express permission of the land owner. Several councils around the country have introduced measures to prevent the establishment of cat colonies and I think this is an important inclusion in the plan.

Provisions in the plan need to include Possible outcomes from the Widening Predator Control across the Lake Wakatipu and Wanaka Catchments. The ORC have contributed funds for this feasibility study and provision in the plan should include policy and implementation provisions.

#### **Please choose one of the following options regarding the public hearing**

I wish to be heard in support of my submission



## Submission on proposed regional pest management plan. 14 December 2018

NAME/ORGANISATION: Ian Morison / **Papatowai Barberry Busters**  
 PHONE 021 279 7170  
 NUMBER STREET NAME 367 Stuart St  
 SUBURB/TOWN Roslyn, Dunedin 9010  
 EMAIL [ian.morison@otago.ac.nz](mailto:ian.morison@otago.ac.nz) 

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.

**Summary:**

1. We seek a more aspirational and ambitious plan for weed control in Otago, that reflects the increasing public sentiment for pest control in New Zealand and that capitalises on the enormous good-will and energy within the community.
2. We seek more emphasis on leadership and less on legislation in the war on weeds.
3. We recommend that the list of pest plants include at least all of DOC's dirty dozen.
4. We recommend coordination and partnership with DOC and local councils since plant pests cross boundaries and the current attitudes of (lack of) responsibility need to change.
5. We do not support the concept of "site-led" programmes if similar infestations in other areas of the region are neglected.
6. We describe a specific problem with Darwin's Barberry in the Papatowai, Stuarts, Mouats Saddle and Houipapa districts that requires urgent attention.

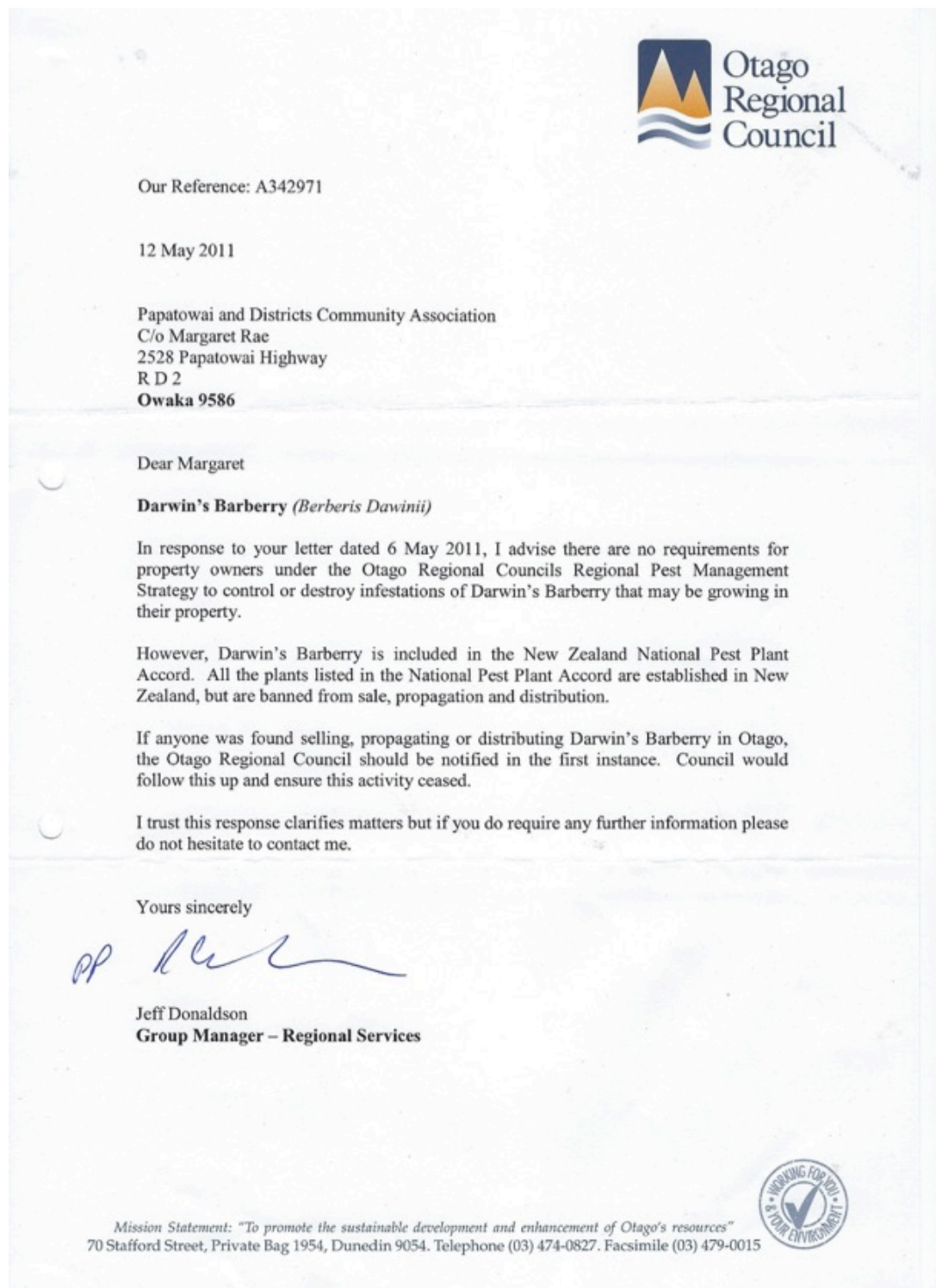
1. The Papatowai Barberry Busters is one small group that reflects the growing concern that Otago residents feel for their environment, and we seek a plan that reflects the level of concern and commitment that we have. We and other want to maintain and enhance the tracts of native forest that we treasure. We are working hard with a specific small focus to do this, but we need support, encouragement and leadership from the only organisation that has a custodial role over the land we attempt to improve. As we watch the rapid spread of invasive plants we can see with our own eyes that good control now will save a lot of work in the future. Ten years is a long time and we are desperately concerned that in 10-year's time, eradication will have been rendered impossible.

2. Each small community has limited resources. Papatowai is one of the larger centres within the Catlins, yet within Papatowai the number of able-bodied, enthusiastic volunteers who contribute to plant pest control can be counted on one hand. In recent years, the Department of Conservation have turned a corner in terms of community interaction and support and now provide encouragement and some equipment for our war on weeds. But their mandate is limited. We look to the ORC for leadership. There is tremendous good will and with the right organisation and enthusiasm, community support can be fostered in the effort to combat pests. Unfortunately we haven't yet see this style of leadership from the only organisation that has the mandate to provide it.

My impression from past correspondence is that the ORC is only concerned by the letter of the law. The copied letter on the next page illustrates the narrow legal approach that ORC has shown to use in the past. This is only one way to fight pests, and it cannot succeed alone. The ORC needs to

provide leadership, publicity, incentives to property owners, local councils and DOC to control weeds.

The way to win this war is to mobilise the community and motivate those who can make a difference. We recommend that by employing a few enthusiastic motivators you will achieve far more than can ever be achieved through legal action, which, of course you hesitate to do because of the substantial costs involved.



With respect to the latter above we suggest that the attitudes and approaches of ORC be changed from words like "requirements" to "incentives" and "encouragement".

3. In 2017 DOC declared war on weeds. They published their very top targets: the Dirty Dozen. Unless it is clear that some of these target weeds do not grow in Otago, then they must be included in ORC's containment and eradication programmes. Of the Dirty Dozen list, only three are in the ORC exclusion or containment programmes. Nine: English ivy, Japanese honeysuckle, woolly nightshade, wandering willie, buddleia, wild ginger, Darwin's barberry, climbing asparagus and banana passionfruit, are either not included on ORC's lists or the control measures are confined to very small site-led programmes.

4. As an extension of point 3, we recommend coordinated and consistent strategies for weed control that are shared by DOC and local councils within Otago.

5. While site-led programmes are laudable, control efforts must be broadened. For example, it would be tragic if the remote, unspoiled native forest of the Catlins became lined by fluoro-orange Darwin's barberry, while control efforts were focussed on the highly modified Otago Peninsula. Plants that are pests in one part of Otago are pests in the rest of it, and ORC publicity and incentives should reflect this. There may be different intensities of activity, but the pest has to be recognised as such throughout.

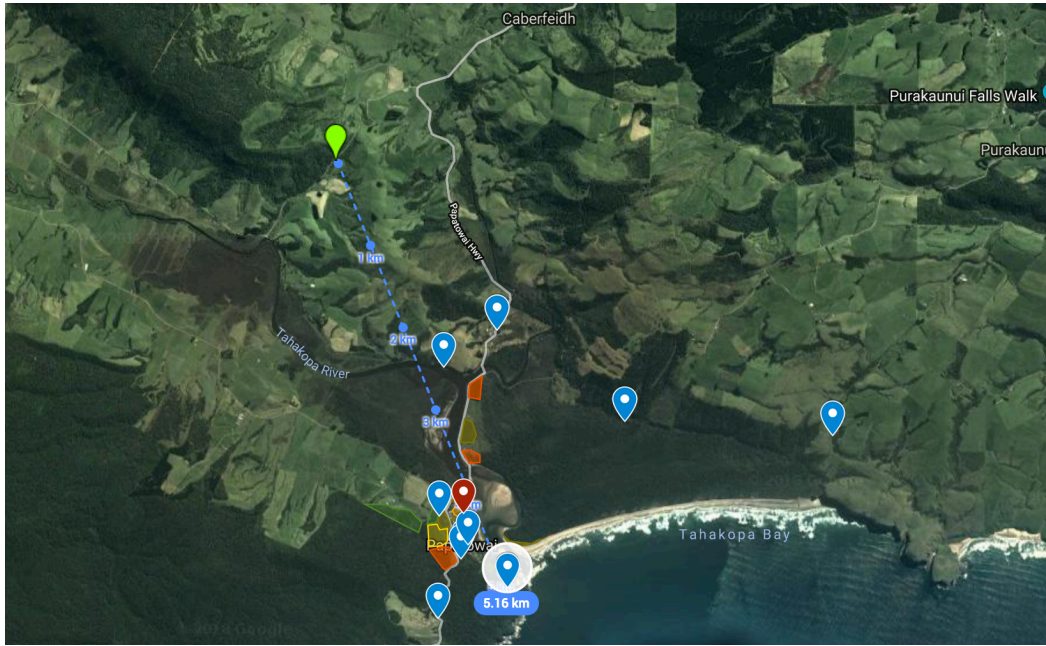
6. We wish to draw attention to the growing problem of Darwin's Barberry in the Papatowai, Stuarts, Mouats Saddle and Houipapa districts. Barberry invades the native bush, initially establishing itself on the edges or in small clearings. It is not suffocated by the regenerating bush, and can grow vine-like branches several metres in length as it seeks and finds light.

In 2001, Allen and Lee described the age and distribution of Darwin's Barberry at Mouats Saddle, one of two regions studied in Otago, presumably because of its high density. Planted in approximately 1940, the barberry had subsequently spread an estimated 30 metres per year. Our recent observations show spread from Mouats Saddle at least 5 km to the coast at Papatowai suggesting the radial spread is at least 64 m per year. In addition, McAlpine & Jesson found seed dispersal up to 450 metres in a two-year period. During our eradication efforts in Papatowai village we have studied and mapped the invasion. We maintain a descriptive map on Google maps that portrays the infestation of barberry around Papatowai only, which is shown on the next page.

A much greater density of invasion is visible around the Stuarts, Mouats Saddle and Houipapa districts. On the basis of the success of the small handful of enthusiasts who have wielded chainsaws, handsaws and loppers for hundreds of hours, we are confident that eradication is possible, but the amount of activity needs to increase and we look to the ORC for leadership. Currently eradication requires cutting and stump poisoning, but we look to others for their experience and expertise. For example, we have heard that DOC have developed a spray that might be effective and if so we all need to know about it. We have yet to hear about the success, or otherwise, of the barberry weevil that was introduced in Southland. It would be great if ORC, together with DOC, could co-ordinate and disseminate this knowledge. One observation in our favour is that barberry does not have a seed bank; that is, the seeds do not survive beyond a year. Therefore when the large "mother" plants are removed there is reasonable hope that, provided smaller seedlings are eradicated, that a region can be cleared.

Darwin's barberry is just one example of a pest weed, and we do not seek to prioritise it over other pests. However, we know from local observation that the infestation will continue to grow exponentially in the coming years and that eradication is feasible. It will be false economy to delay efforts to control this and many other obvious pest plants. All it will take is leadership.





A descriptive map that portrays the infestation of barberry around Papatowai. The bright green marker in the top figure shows Mouats Saddle, the centre of the infestation.

## References

McAlpine KG, Jesson LK. Linking seed dispersal, germination and seedling recruitment in the invasive species *Berberis darwinii* (Darwin's barberry). *Plant Ecol* (2008) 197:119–129

Allen RB, Lee WG. Woody weed dispersal by birds, wind and explosive dehiscence in New Zealand. *New Zealand Plant Protection* 54:61-66 (2001)

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 8:35:37 AM

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P322

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Ann Reynolds

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

034780162

**Postal Address**

1 Michael Ave Dunedin 9077

**Email**

haefn0@gmail.com

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

I DO NOT support the inclusion of feral cats or hedgehogs as 'regional pests'. There is little research backing the claims that these two animals contribute to the deaths of large numbers of birds and invertebrates. In fact, research that has been done suggests that the main diet of feral cats consists of rodents, In addition to the lack of supporting research, encouraging and legalising the killing of any animal on a mass public scale discourages the development of empathic thinking and behaviour. My expressed wish is that the ORC decides NOT TO INCLUDE THE INCLUSION OF FERAL CATS AND HEDGEHOGS UNDER THE CATEGORY OF 'REGIONAL PESTS'.

**Please attach your submission or any supporting pictures or documents.**

No Answer

**From:** [Otago Regional Council](#)  
**To:** [Pests](#)  
**Subject:** Anonymous User completed Proposed Regional Pest Management Plan  
**Date:** 14 December, 2018 8:25:46 AM

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P323

Anonymous User just submitted the survey 'Proposed Regional Pest Management Plan' with the responses below.

**Contact details**

Please note: all information contained in a submission, including names and addresses for service, becomes public information.

**Full name**

Sandra Jane Condon

**Organisation submission is on behalf of (if applicable)**

No Answer

**Contact phone**

0274400044

**Postal Address**

No Answer

**Email**

No Answer

**Contact name for service of person making submission (if different from above)**

No Answer

**Postal address for service of person making submission (if different from above)**

No Answer

**Public hearing - please choose one of the following options:**

I do not wish to be heard in support of my submission

**Signature**

Please note a signature is not required when making a submission by electronic means.

**Please ensure you include the following information in your submission.**

Submissions should state:  The specific provisions of the Proposed Regional Pest

Management Plan to which the submission relates;  Whether you support or oppose the specific provisions, giving reasons; and  The precise details of the decision you wish ORC to make.

**You can use the below space to write a submission on the Proposed Regional Pest Management Plan or you can attach your submission below.**

1. We strongly oppose cats included as pests. Cats are NOT pests !!!!! 2. We strongly oppose hedgehogs included as pests !!!! Hedgehogs are NOT pests !!!!! 1. All cats keep the rats and mice and mustelid numbers down and very shy. Rats and mustelids are the major predator on birds. We need the cats! They provide people and birds a very good service in keeping rodents away. People cannot reliably identify a feral, stray or domestic cat when it is trapped. Microchips are too unreliable and move around the body. DO NOT KILL ANY CATS !!! When an animal is considered a pest, people (psychopaths) believe it is ok to kill them. This is already being proved with an alarming increase in cruelty, maiming and murdering of beloved pet cats. The Council MUST prevent this - not encourage it. DO NOT allow any Ranger or anyone to kill a cat - ever ! This achieves NOTHING ! Other than more rats will live to kill more birds. More cats will come into a void territory making killing any cat VERY WRONG and blatantly stupid ! Innocent, dearly beloved pets will be killed if this plan is adopted. Much better for Council to fund SPCA and/or another cat rescue/cat caring group of people to look after any cats trapped. Please do this. Please do NOT kill any cats !!! Please see and read all of the attached document. People are outraged !!! 2. Hedgehogs. NOT pests !!! They are very good to have in suburban gardens, eating slugs and snails. Suburban and urban areas have NO ground nesting birds and therefore no eggs available for any hedgehogs. Hence, hedgehogs are NOT a pest!!! We all love the hedgehogs. DO NOT KILL THEM. There are not enough hedgehogs around ... We need more hedgehogs !! Nature looks after itself. It is wrong and far worse when people start interfering. Then more and worse problems are caused. History has proved this again and again. Leave the natural ecology alone !! We fully support the submission from Feline Rights: Cats-Feline Rights-Submission-ORC-RPMP-14.12.18.pdf

**Please attach your submission or any supporting pictures or documents.**

No Answer



**From:** [Rachel Hufton](#)  
**To:** [Pests](#)  
**Subject:** ORC RPMP submission  
**Date:** 14 December, 2018 6:02:38 PM

P324

#### Name

Rachel Hufton

#### Organisation Name (If submission is on behalf of an organisation)

Aspiring Biodiversity Trust

#### Email

[rhufton@gmail.com](mailto:rhufton@gmail.com)

#### Phone Number (Mobile)

0210510240

#### 4.1 Table 2 Organisms declared as pests

I support the list of plants and animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats.

I suggest council accepts the list of animal pests as listed in the plan.

Additionally, I would add Southern black-backed gull an avian predator increasing nationally. This species is having a negative effect on the breeding success of many endemic braided river birds in particular the nationally endangered black-fronted tern and black-billed gull.

#### 6.4 Pests to be managed under sustained control programmes

In the coming years as OSPRI withdraws their possum control from areas, where TB has been removed, ORC will need to have its own plan for possum control. Possums have a huge impact on our native flora and fauna so their control is necessary for both biodiversity reasons as well as vectors for TB

I would like to see the addition of possums to the list of pests to be managed under sustained control programmes. And for the ORC to have a plan for possum control across the region. The plan should include objectives such as Residual Trap Catches (RTCs) and rules for land occupier responsibility. I suggest the Council adds possums to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.

#### Description of Feral cats p.64

I support the inclusion of feral cats for site-led control. Cats, whether owned or unowned, are highly skilled hunters and very destructive to our native wildlife. Cats are an apex predator in New Zealand, meaning that if humans don't control them then nothing else will.

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. Microchipping is the most definitive way to differentiate between an owned and unowned cat. Controlling cats near populated areas, such as Broad Bay and Portobello on the Otago Peninsula, is difficult if you are unable to clearly identify an owned or unowned cat. Requiring all owned cats to be microchipped protects them from being incorrectly identified as unowned cats.

#### Inclusion of other animal pests

I support the inclusion of hedgehogs, mustelids and rats as site led pests. All these species have significant impact on our native biodiversity and need to be controlled, especially in areas with significant native ecosystems.

Council should accept the list of animal pests especially the inclusion of hedgehogs, mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control. The council should include Southern black-backed gull control within local areas of concern i.e. braided river habitats in relation to protection of endemic avian biodiversity.

#### **6.5.5 Site-led programmes at West Harbour – Mt. Cargill area**

#### **Are there any other comments you would like to provide on the proposed Regional Pest Management Plan?**

There is no mention of feeding cats or establishing cat colonies on council land or on private land without the express permission of the land owner. Several councils around the country have introduced measures to prevent the establishment of cat colonies and I think this is an important inclusion in the plan.

For example in GWRC's proposed RPMP rule which states:

"No person shall feed or provide shelter to pest cats on private or public land within the Wellington Region, without the permission of the occupier." I suggest ORC also includes a similar provision in their RPMP.

The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.

#### **Please choose one of the following options regarding the public hearing**

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

**From:** [Peter Dowden](#)  
**To:** [Pests](#)  
**Subject:** submission to pest plan  
**Date:** 14 December, 2018 7:36:59 PM

P325

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I support the proposed pest plan

I support the inclusion of Sycamore in site led programmes in Dunedin

Please extend sycamore to Clutha district particularly the Manuka Gorge which will have to be renamed Sycamore Gorge soon the way things are going.

I also apply to have my late submission considered.

I wish to be heard in support of my submission

--

from Peter Dowden

Residence: 12 Woodhaugh St, Woodhaugh, Dunedin/Otepoti, 9010, NZ

t: +64-3-467 9353

m: +64 21 137 2129

f: [facebook.com/peter.dowden](https://facebook.com/peter.dowden)

...please consider the environment and go by public transport...

...arohatia te taiao, haere ma runga pahi...

## Submission on the ORC Proposed Regional Pest Management Plan Dec 2018

### Wilding Conifer Group Incorporated (WCG)

Thank you for the opportunity to submit on ORC's Proposed Pest Management Plan.

The WCG would like to speak to this submission.

#### **The WCG commend the ORC for acknowledging 10 species as wilding conifers within ORC's Proposed Pest Management Plan (RPMP).**

The WCG commends ORC for the development of new Pest Management Plan in regards to rules involving Wilding Conifers.

The RPMP states on page 44 that *wilding control efforts to date have been very successful where work has been carried out*. Many areas in and around Queenstown have had seed sources removed and are now in a maintenance phase.

Large seed sources have been removed from the Roaring Meg, Skippers, Walter peak Station, Von Valley and from Kingston to Jacks Point. Work removing conifers from the Arrowtown Faces has now started by the community. QLDC is committed to removing the Coronet Forest – a major Douglas fir seed source. It is noted that there are large mature seed sources around Douglas fir and Corsican pine plantations around Queenstown which the WCG is working to contain and control.

Since the WCG creation in 2009, the goal of protecting landscapes for future generations has been achieved by halting the spread of new conifers and removing coning outliers before they start seeding. The job now is to tackle remaining seeding trees which are situated in close proximity to vulnerable Outstanding Natural Landscapes.

Queenstown's unique climate pushes Contorta to grow from a seed to a seeding tree in six years, Douglas fir in ten years, the exponential explosion requires immediate funding and control from Councils, government community, and business.

**The wilding issue in the Otago region is currently at a point where the battle to gain control of areas can be 'won' if the work is completed now – 'a stitch in time saves nine'. What is required to reach this point is support from ORC in the form of monitoring and enforcing the rules within the proposed RPMP.**

#### **1. Submission - 4. Organism Declarations - page 19 – support**

**Contorta pine** at the bottom of the page 19 has an Asterix '\*' and a sub note '5'. This can be confusing and it is hard to see that the two are separate - further clarification is required to differentiate between the two. The removal of the sub note '5' would mean that rules still apply to this species as a unwanted organism

Contorta could be classified separately as an unwanted organism so that it cannot be kept in plantations, shelter belts or plantations less than 1ha.

**2. Submission - Point 6.3.4 on page 45 - the heading of *Contorta (lodgepole) pine, Corsican pine, Scots pine, dwarf mountain pine, mountain pine and larch***

In the last paragraph about Contorta, it should be reiterated that Contorta is classified as an unwanted Organism and therefore there are additional rules around this species, as this is currently not clear.

**3. Submission Page 45 Existing planted conifers less than 1ha –**

Last sentence –*transition arrangements for long term removal of shelter belts.* – Addition that - contorta and other pest plant shelterbelts should be removed and replaced with non- spreading wilding species within a 5 years of this plan being adopted.

**Reason** - Giving the period of five years gives landowners something to work towards and encourages them to proactively start planning and implementing plans for removal of these shelter belts that spread windblown seed onto vulnerable on or low grazed land. It is vital mature shelter belts which contain wilding species are removed, as they continue to infest and populate land that has been cleared, which means that money is spent returning to areas again and again.

**4. Submission – Plan rule 6.3.4.2, and 6.3.4.3**

That occupiers shall destroy wilding conifers.....present on land they occupy within 200m of an adjoining property boundary prior to cone bearing.

The WCG want it stated that ORC have recommended a clearance area of 200m, but Douglas fir, Larch or Corsican, Contorta, Mountain or Scots pines all have light seed which can be deposited in wind events well beyond 3 kms.

The risk of spread is increased when the neighbouring or downwind vegetation cover is low stature vegetation with no or light grazing.

**5. Submission - Plan rule 6.3.4 page 46**

Addition - New rule added that in regards to existing shelter belts and plantations under 1 ha, a strong ruling is required that ORC works with the landowners to replace or remove the wilding conifers within 5 years of this plan becoming operative, where the shelter belt is sited next to vulnerable land.

**Definition of Vulnerable land**

- a) The downwind vegetation cover is:
- Forest/shrubland/tussock/grassland with few gaps
  - Open forest and/or scattered patches of dense shrubland/tussock/grassland with many gaps
  - Open slips/rockland and/or light, low-stature shrubland/tussock/grassland
- b) The downwind Land use – Grazing is:
- Semi-improved grazing (sheep/cattle)/ occasional mob stocking with sheep
  - Extensive grazing only
  - No grazing

## 6. Submission Plan objective 6.3.4 page 46

**Addition of new rule for Contorta Pine as an unwanted organism:** Contorta Pine rule as per the previous 2009 Otago RPM strategy:

- Total control in the Lakes district area; Occupiers must destroy all Pinus contorta on their land

## 7. Submission - Plan Rule 6.3.4.1, page 47 - support in part

The rule states that occupiers shall destroy all wilding conifers if  
b) the control operations were publically funded (either in full or in part).

**Reason:** The WCG wants the ORC to recognise that the RPMS needs to be a tool that compliments pest control programs by reinforcing the responsibility of control onto the landowner, without penalising landowners for carrying out work. The WCG does not want the rules to become a barrier for someone to enter the program. For example the above rule while great for people already in the program could be seen as a barrier for entering the program if a landowner could be seen to face ongoing liabilities under the RPMP

## 8. Submission Page 47 Plan Rule 6.3.4.2

Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier.

**Amend to say** - any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier, **agency, or Community group involved in wilding control.**

**Reason** – this should not be restricted to the neighbouring landowner, other individuals should be able to report a breach of this rule.

## 9. Submission - Page 47 Plan Rule 6.3.4.3

Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier.

**Amend to say** - any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier, **agency, or Community group involved in wilding control.**

**Reason** – this should not be restricted to the neighbouring landowner, other individuals should be able to report a breach of this rule.

## 10. Submission Point 7. Monitoring – page 82.

Progressive containment programmes

Support –spatial reduction of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch over the life of the Plan.

**Comment** – we support the annual inspection program funded by ORC, but would like this inspection to be collaborated with the WCG which ORC are a stakeholder of.

#### **11. Submission – Monitoring**

The WCG wish to add into Monitoring for Wilding Conifers - that monitoring occurs as a response to new populations that have been recorded. - - therefore addition of – also as appropriate.

#### **12. Submission** -WCG request that ORC increase their resourcing for environmental monitoring and compliance of wildings across Otago.

QLDC support and agree with what ORC is trying to achieve within the proposed RPMP framework for wilding conifers, and QLDC support the intent of the rules, but we worry about the interpretation. We do not want to see the rules discouraging landowner to buy into pest programs.

#### **13. Submission 6.3.4** - Increased education and information on wildings. WCG supports that ORC should take the lead on education and advocacy, by providing information on biodiversity and sharing information

#### **14. Submission** - WCG recognises the importance of ORC staff members to be fully involved in every aspect of wilding control in a stakeholder capacity, ORC staff and Councillor representation on WCG executive add to the operational auditing of ORC financial inputs which is noted within poin6.3.4 of the plan.

**From:** [Shayde Bain](#)  
**To:** [Pests](#)  
**Subject:** FW: Pest Strategy Submission  
**Date:** 17 December, 2018 3:37:39 PM

P327

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**From:** Alex Kerr <alexkerr05@gmail.com>  
**Sent:** Monday, 17 December 2018 3:13 p.m.  
**To:** Shayde Bain <Shayde.Bain@orc.govt.nz>  
**Subject:** Fwd: Pest Strategy Submission

Hi Shayde

I got your message thank you. I rang Scott on Friday and Scott texted back and gave me your email address for my submission to be included but I have also sent it to the address you gave me to send it to. In addition last night I sent it to all the ORC Councillors and Stephen Woodhead emailed me back saying he would forward it. So hopefully between all these addresses it gets there. P.S. Hopefully I heard the address you gave me correctly but I will ring you.

Cheers and Kind regards Alex

### **Cover letter sent**

Dear Council

Please consider this my submission on your Pest Management Strategy Survey. I am submitting by email because I could not get the submission link to work on Friday the 14th on the ORC website. I tried three times during the day only to finally see that ' the survey had been concluded' about 7.30pm on the 14th.

Please note I had already written out my submission on the forms sent out by the ORC but was just not able to drop them down and as I was sure I could make my submission online. I chose that medium, as the ORC site said submissions would be accepted until the 14th December. Of course I assumed that meant that it included the 14th otherwise I'm assuming the site would have said by 'midnight on the 13th'

Assuming this is acceptable

### **"My Submission"**

**I oppose the following animals being categorised as pests ( I think it's section 4.1 )**



**feral cats**

**hedgehogs**

**feral goats**

**feral deer**

**possums**

**I would like to be heard regarding the above but some of my reasons are as follows:**

**Feral Cats** - Truly feral cats live in forested areas and according to an article from Predator Free NZ ( article references available ) the environment a cat finds himself in dictates their prey catch and in one study in Auckland, prey captured by cats in more natural forested areas consisted mainly of rodents. Therefore it could be argued that cats in this setting proved positive for natives.

Predator Free NZ also acknowledged that they had no idea how many cats there were in NZ casting into doubt all estimates of their predation and impact on native wildlife in the country. Indeed suggesting all estimates are really guesstimates!

Therefore I argue that more research needs to be done before we deem cats to be pests and start killing them.

Councillors the name 'Pest' demonises an animal and once declared a pest that animal is no longer valued as a sentient being ( a term only recently included into our animal welfare Act and an addition lauded by progressive law makers worldwide ). In fact Pests are devalued to the point that their suffering is no longer a concern. Not even considered an animal that the spirit of the Animal welfare Act may apply to. Evidence of this is the escalating animal cruelty due in New Zealand due to a three year attack on cats by Foundations like the Morgan Foundation and Media. In fact animal cruelty toward cats of all categories and other animals ranging from dogs to sheep is rising. All can be attributable to the notion that some animals are pests and do not need to be considered at all and it is changing people for the worse. Every week now there is news of a domestic cat being shot by people in communities, or worse. A fact that was commented on by Gareth Morgan who stated tghat of course these people should be charged. But sadly he and others campaigning against cats can't see their part in the devaluing and demonising of cats and can't see that cruelty is rising as a result of their campaigns and that people are getting worse and empathy is getting less.

In Wanaka GPS led one cat owner to their neighbors garbage bin to find her moggy dead from a bullet. No charges were laid. In spite of a gun being fired in a built up area and his assertions that he thought it was a possum which didn't really ring true. Which means normal cat owning

people are in 'fear' of loved pets being viciously killed by those that feel that Govt and Local Govt have given them some sort of Green light to do so. Cat owners are literally living under the sword of Damocles, fearing their neighbors, 'fearing their Councils' as well as hostile attacks by many on Social Media or even passers by. Such attacks on cats are actually an attack on families. And an attack on those with that have 'a regard for ALL life'.

Predator Free NZ suggests that Dunedin ( Otago's biggest City ) may have up to 35 per cent of households owning one or more cats. And suggests refraining from treating these households as irresponsible and suggests working with cat owners for better management. Other stats are that 95 per cent of people in NZ think a cat should have access to outside. With very low support for cats kept inside 24/7. And that not all cats are avid killers.

Councillors, why am I talking about domestic cats when the ORC strategy targets Feral Cats? The reason is it is not known how the ORC will "define" Feral Cats. The Morgan Foundation want a determination that any cat without a microchip is a feral cat. A dangerous proposition as a) microchips fail. b) kill traps and shooting do not allow for scanning prior to death ( Auckland City has decided to hold non microchipped cats for a period of time to allow for families to claim ) c) a trapped cat cannot be reliably identified as feral as different cats react different to being trapped d) no proven impact on native life ( the fact that a cat may kill a bird does not suggest that the whole population is threatened. In fact overseas research suggests that cats mostly catch what they call 'the doomed surplus' i.e those sick and injured that are grounded. And e) studies of the impacts of killing feral cats suggest that it actually increases the population of feral cats ( article available on request). In the cities landlords not allowing tenants with cats is seeing tenants try to rehome cats, with many cats running away from new owners. And of course leaving cats behind, dumping cats, ALL a predictable spinoff from Govt and media devaluing cats. f) there is an amazing study that has actually found that as feral cat populations are killed native life in the area also drops. Native life rises as cat numbers increase. ( this article is archived but I can find it ) The relationship is probably due to other so called Predators stepping up when the son called Alpha Predator is taken out. g) there is a rising body of evidence that is being taken to the United Nations currently about the down side of eradication, calling animals Pests, the inhumane treatment afforded Pests, the effectiveness of such killing and the influence killing is having on people. A quick policy decision may see the ORC on the wrong side of history.

A loss of empathy is occurring among the young at a time when anti violence, anti bullying, anti rape agencies are calling for more empathy to be taught. I mention this because animals are often the first place children learn empathy and a regard for life. Teach a child to kill and the loss of empathy that occurs is often a loss of empathy overall. The child learns that lives can be devalued depending on public opinion be it women, migrants, race, gender.

Another question surrounding the term feral cats is that It is not known where the ORC might start killing cats whether it be outside cities or inside them or around them including buffer zones, reserves and town belts.

It is not known how the ORC plans to kill them. Papp poison smeared on trees ( a microchip wouldn't help ) or kill traps. Three years ago I found out about volunteers working under a contractor placing Fenn traps around Dunedin. Breaching the Act by not inspecting daily leaving cats to die slow agonising deaths due to Fenn traps being inappropriate True Feral cats live independant of people unlike lost or abandoned cats that live closer to cities. Most of the cats that live around cities are able to be trapped, desexed and rehomed after a socialisation or re-socialisation period. Trap, Neuter, Rehome or Return and Manage has been proven internationally to be the only 'humane' way of dealing with feral andc stray cats. The United Nations agree. And Great organisations like Cat Rescue are already doing this in Otago. Responding to calls from all over Otago. If ORC wanted to do something positive it would be to help fund this excellant work.

### **Hedgehogs**

In spite of some knowledge of hedgehogs being omnivorous their impact on natives has no evidence base to suggest its even remotely significant. Hedgehogs are liked by many and many people would oppose a 'good neighbor' approach that compelled killing these little animals on their property. Indeed any animal talking about this 'good neighbor' act. Sounds like something straight out of Nazi Germany. Its Draconian.

### **Feral Goats, Feral Deer, Possums**

All herbivores and all scapegoats for declines in areas regularly treated with 1080 over 60 years. Originally an insecticide only the zealot and the naive would imagine that this chemical would not affect natives. The worst I would go to with these animals would be 'managed' even though many ex forestry workers tell you the forest grows faster than these animals ability to eat it. Because populations or breeding in areas without 1080 are controlled naturally by season, food availability etc....and hunters in areas ( I'm not a hunter ). so eradication definitely not. Eighty five per cent of the population want poison gone and they will win.

Lastly I believe any man that does not respect sentient life has a lack of awareness about life and man's progress is dependant on that changing. Accomodation is the future. I know many think the only good cat, possum, ..etc are dead ones but many farmers said that about Kea. And of course these people have to know that these are not the values of every New Zealander. Trying to get people to kill will eventually work against Conservation. I myself cancelled subscriptions to Forest and Bird and Green Peace because of their support for Predator Free. These are not my values and i don't want to pay for things I don't want.

I would like to be heard. My view is my own but there are many better things that could be done to help natives without demonising animals and calling them pests. De-sexing partnerships for Cats and funding for organisations that are already making a difference is just

one.

Thank you

Alexander Kerr

73 Glen Road

Dunedin

0274 316 045



OTAGO REGIONAL COUNCIL  
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14 DEC 2018  
FILE No. ....  
DIR TO .....



# SUBMIT ON THE PROPOSED REGIONAL PEST MANAGEMENT PLAN

SHARE YOUR FEEDBACK BY  
14 DEC 2018

You can either:

Email your completed submission to pests@orc.govt.nz by 5.00pm 14 December 2018.

Alternatively, post your signed submission to:  
**Proposed Pest Management Plan**  
Otago Regional Council  
70 Stafford Street  
Private Bag 1954  
Dunedin 9054

RECEIVED  
14 DEC 2018  
BY: *[Signature]*

You can also deliver your submission to Otago Regional Council's office at 70 Stafford St, Dunedin.

## CONTACT DETAILS

### NAME/ORGANISATION

Josie Harris

### PHONE

0223 156334

### NUMBER STREET NAME

73 Bayfield Road

### SUBURB/TOWN

Andersons Bay

### POSTCODE

### EMAIL

josieharris@hotmail.co.nz

Contact name and postal address for service of person making submission (if different from above):

### NAME/ORGANISATION

### NUMBER STREET NAME

### SUBURB/TOWN

### POSTCODE

### SIGNATURE

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

*[Signature]*

Please note: all information contained in a submission including names and addresses for service, becomes public information.



**PUBLIC HEARING**

Please choose one of the following options:

- I do not wish to be heard in support of my submission; or
- 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. Please ensure you provide a phone number if you wish to be heard in support of your submission

<p><b>THE SPECIFIC PROVISIONS MY SUBMISSION RELATES TO ARE:</b></p> <p><i>Please specify the rule or section number and title your submission point refers to.</i></p>	<p><b>MY SUBMISSION IS THAT:</b></p> <p><i>Please include whether you support, oppose or wish to amend each separate provision you have listed in column 1 and the reasons for your views.</i></p>	<p><b>THE DECISION I WOULD LIKE OTAGO REGIONAL COUNCIL TO MAKE IS:</b></p> <p><i>Please give details of the outcomes you would like to see for each provision.</i></p>
<p><b>EXAMPLE</b></p> <p>Section 4.1 – Organisms declared as pests - Hedgehog</p> <p>Section 2.5</p>	<p><b>EXAMPLE</b></p> <p><input type="radio"/> Support    <input type="radio"/> Oppose    <input type="radio"/> Amend</p> <p><b>REASONS:</b> Hedgehogs do not have an impact on the environment.</p> <p>-disappointed with the level of public participation in the development of the plan. Drop in session at ORC seemed to lack any staff who could adequately answer questions beyond an extremely basic level. The public were excluded from the Stakeholder forum. Concerns from Invermay vet staff and the public re inhumane methods of pest control were largely ignored and were not considered important. Only key stakeholders were invited to discuss the development of pest management strategies.</p>	<p><b>EXAMPLE</b></p> <p>Hedgehogs should not be included as a pest animal.</p> <p>'Pests' are animals and when labelled a 'pest' have no animal welfare rights due to Nick Smith's amendments to the Animal Welfare Act. I and many people I know find this deeply disturbing as it leaves animals to be subject to 'moderately humane' cruel poisoning that can mean they suffer horribly before death. I would like to see poisons that are slow acting &amp; that cause non-target casualties to be excluded from use.</p>
<p style="text-align: right;">= Inadequate public consultation &amp; input.</p>		



<p><b>THE SPECIFIC PROVISIONS MY SUBMISSION RELATES TO ARE:</b></p> <p>Please specify the rule or section number and title your submission point refers to.</p>	<p><b>MY SUBMISSION IS THAT:</b></p> <p>Please include whether you support, oppose or wish to amend each separate provision you have listed in column 1 and the reasons for your views.</p>	<p><b>THE DECISION I WOULD LIKE OTAGO REGIONAL COUNCIL TO MAKE IS:</b></p> <p>Please give details of the outcomes you would like to see for each provision.</p>
<p>6.3.4 Wilding Pines</p> <p>pg 51 lupins</p>	<p>I consider that widespread poisoning of pines is a short sighted fix. In the first instance emphasis should be placed on containment. It has been shown that planting of natives around pine plantations can stop dispersal and can also act as corridors for native species. I consider the ORC as having considerable interest economically in pine forests &amp; therefore should be planting native barriers around all areas. Subject to downwind seed dispersal. I oppose the use of poison to control wilding pines. These plants have become naturalised &amp; should not be considered a pest species.</p>	<p>= No poisoning Manual removal focus on Containment.</p>



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Please give details of the outcomes you would like to see for each provision.

9.3.6

I consider that the use of poison in pest control has the potential to negatively affect both the environment's subject to receiving them and also on NZ's 'clean green' image

Exclude the use of poisons where at all possible and look to move sustainable environmentally practises eg trapping bounties on pests etc.



<p><b>THE SPECIFIC PROVISIONS MY SUBMISSION RELATES TO ARE:</b></p> <p>Please specify the rule or section number and title your submission point refers to.</p>	<p><b>MY SUBMISSION IS THAT:</b></p> <p>Please include whether you support, oppose or wish to amend each separate provision you have listed in column 1 and the reasons for your views.</p>	<p><b>THE DECISION I WOULD LIKE OTAGO REGIONAL COUNCIL TO MAKE IS:</b></p> <p>Please give details of the outcomes you would like to see for each provision.</p>
<p>Staffing</p> <p>Use of pesticides/ Insecticides</p> <p>lack of explanation overall in strategy as to preferred Methods for pest control</p>	<p>I consider the ORC to be seriously understaffed and as a result can only resort to poisoning as 'The only tool in the box'</p> <p>I oppose the use of poisons as they have the potential to adversely affect health of ecosystems &amp; humans</p>	<p>= Require a team of people qualified in environmental management who can look more into site specific variables &amp; therefore more targeted pest control using methods that exclude pesticides/insecticides as these are proven to be harmful to both animal &amp; human/biota health.</p> <p>exclude the use of poison where at all possible</p>



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Section 9.3.2

The use of various poisons have not been adequately evaluated with respect to public health. The current practise of dropping into catchments & water supplies against manufacturers guidelines is unacceptable and has the potential to affect the health of children & unborn children & therefore Public Health boards should have to be consulted & should provide actual studies and data to ensure poisoning method in no way detrimentally affect public health.

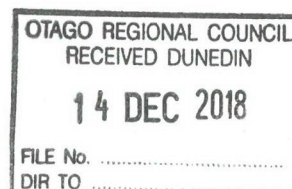
- requirement for any contractors to remove dead poisoned carcasses from waterways & bury the dead from Catchment areas. All waterways to be avoided where possible. Public Health Standards to be adequately evaluated & justified.

9.3.4.

I consider that the public's enjoyment & recreation eg dog exercising / tramping etc is also affected & should be considered

Otago Regional Council  
Private Bag 1954  
Dunedin 9054

11 December 2018



Dear Sir/Madam

We are pleased to enclose our submission on the Proposed Regional Pest Management Plan. We trust you will appreciate the intent of our submission and allow the adjustment.

We wish to back up our submission with a plea to the Council to enforce compliance with the plan. We represent over 80 landowners who are our members and we all rely on a "good neighbour" policy of co-operation. It is extremely disheartening for our members to have neighbours who have no intention, or enforced obligation, to control their pests.

We also note with some concern that control of both white and Canada geese is not incorporated in the Pest Management Plan. The thousands of geese that foul the land and water, particularly in the South Eastern Maniototo, (Styx area ) must surely be a concern now and more so in the future. With the public's concerns over water quality and faecal contamination we believe geese must be incorporated into the Pest Management Plan. Our organisation will co-operate and participate in any strategies to control and enforce compliance with the Pest Management Plan.

We look forward to viewing the new plan and will be happy to assist in any way we can.

Yours faithfully



C M Hore – Chair  
Maniototo Pest Management Inc



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**Proposed Pest Management Plan**  
Otago Regional Council  
70 Stafford Street  
Private Bag 1954  
Dunedin 9054

You can also deliver your submission to  
Otago Regional Council's office at 70 Stafford St, Dunedin.

## CONTACT DETAILS

### NAME/ORGANISATION

MANIOTOTO Pest MANAGEMENT INCORPORATED

### PHONE

03-470-3615

### NUMBER STREET NAME

PATEAROA - Waipioa Road

### SUBURB/TOWN

PATEAROA

### POSTCODE

### EMAIL

Steve@bhas.co.nz

Contact name and postal address for service of person making submission (if different from above):

### NAME/ORGANISATION

STEPHEN J. BROCKLEBANK

### NUMBER STREET NAME

103 EASTHER CRESCENT

### SUBURB/TOWN

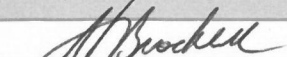
DUNEDIN

### POSTCODE

9054

### SIGNATURE

(Signature of person making submission or person authorised to sign on behalf of person making the submission)



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<p><b>EXAMPLE</b></p> <p>Section 4.1 – Organisms declared as pests - Hedgehog</p> <p>An exception to ; Objective 6.4.6 as set out in Section 78 of the Act.</p>	<p><b>EXAMPLE</b></p> <p><input type="radio"/> Support    <input type="radio"/> Oppose    <input checked="" type="radio"/> Amend</p> <p><b>REASONS:</b> Hedgehogs do not have an impact on the environment.</p> <p>Please refer to attached letter</p>	<p><b>EXAMPLE</b></p> <p>Hedgehogs should not be included as a pest animal.</p> <p>Please refer to attached letter.</p>



Otago Regional Council  
Private Bag 1954  
Dunedin 9054

12 December 2018

Dear Sir, Madam

**Application for exception to rules relating to the District Plan's Pest Management in Maniototo by Maniototo Pest Management Incorporated (MPMI).**

MPMI has been operating in the Maniototo area for the past 20 years, initially as a company. Its primary purpose has been to provide pest control services (mainly rabbits) to its 80+ members representing the majority of landowners in the Maniototo. MPMI operates as a "user pays" business with its members paying six monthly levies which are recorded into their individual property accounts. These funds are then utilised for control services carried out by MPMI along with administration and monitoring costs.

The services provided by MPMI have seen rabbits kept under control in the area to the extent that there have been no major 1080 poisoning operations required for over ten years, which is a significant change in the history of rabbit management in the area.

MPMI is currently assisting the Otago Regional Council with the identification and control of wallaby incursions into the region. MPMI regard the wallaby pest as a major threat to biodiversity and the financial viability of farmers in the region and will continue to provide whatever support it can to ORC in its objective of eradicating the wallabies from the region.

MPMI notes the rule set out in Part Two of the proposed District Plan and wishes to apply for an exception to the requirement that would see a "trigger point" of Maclean Scale 3 (Plan Objective 6.4.6) applied to its members. MPMI would see Maclean Scale 4 as an appropriate level for its members.

MPMI's reasons for seeking an exemption:

1. Our request will not significantly prejudice the attainment of the plan's objectives.
2. The requirement has been substantially complied with. (Action can and will be taken on individual member properties where regular monitoring indicates the necessity to do so.)
3. The recent history of rabbit control in the Maniototo indicates that the requirement is unnecessary or inappropriate in this particular case.



Maniototo  
PEST MANAGEMENT

Maniototo Pest Management Incorporated  
PO Box 5848  
Dunedin 9058

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M PMI requests that all members of the Incorporated Society be exempted from the requirement as they are all being regularly monitored to identify the need for control services. All members are "neighbours" under Plan Rule 6.4.6.2 and are therefore likely to report any threat from neighbouring properties to M PMI management.

Based on the above information M PMI request that Otago Regional Council grant an exception to all its members from the requirements to maintain their rabbit numbers at Maclean Scale 3, thereby accepting Maclean Sale 4 as the trigger point for any Compliance action by the Council.

Thank you for your consideration

Your faithfully

Charles Hore  
Maniototo Pest Management Inc.  
Chairman

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*Please give details of the outcomes you would like to see for each provision.*

Objective 6.4.6



SHARE YOUR FEEDBACK BY

14 DEC 2018

# SUBMIT ON THE PROPOSED REGIONAL PEST MANAGEMENT PLAN



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**Proposed Pest Management Plan**  
 Otago Regional Council  
 70 Stafford Street  
 Private Bag 1954  
 Dunedin 9054

You can also deliver your submission to  
 Otago Regional Council's office at 70 Stafford St, Dunedin.

### WANT TO GIVE FEEDBACK ON THE BIOSECURITY STRATEGY?

You can do this by filling out the feedback form on [yoursay.orc.govt.nz/pestplan](http://yoursay.orc.govt.nz/pestplan) or give us a call on 0800 474 082 and we can send a form out to you.



### CONTACT DETAILS

#### NAME/ORGANISATION

Daana Suzanne Tomlin

#### PHONE

020 415 94742

#### NUMBER STREET NAME

12 Surrey Street

#### SUBURB/TOWN

North Balclutha

#### POSTCODE

9230

#### EMAIL

moongodesssverb@gmail.com

Contact name and postal address for service of person making submission (if different from above):

#### NAME/ORGANISATION

#### NUMBER STREET NAME

#### SUBURB/TOWN

#### POSTCODE

#### SIGNATURE

(Signature of person making submission or person authorised to sign on behalf of person/organisation making the submission)

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<p><b>EXAMPLE</b></p> <p>Section 4.1 – Organisms declared as pests - Hedgehog</p>	<p><b>EXAMPLE</b></p> <p><input checked="" type="radio"/> Support <input type="radio"/> Oppose <input type="radio"/> Amend</p> <p>REASONS: Hedgehogs do not have an impact on the environment.</p>	<p><b>EXAMPLE</b></p> <p>Hedgehogs should not be included as a pest animal.</p>
<p>I Am an Animal Welfare Advocate; I Do not like Intensive Hunting</p>		



I'm a Goat Enthusiast - Do not want  
All Goats eradicated,  
Hedgehogs are not a threat - I have a  
pet one; not all Deer I eradicated or Pigs;  
I am against poisoning / suffering of  
Animals;

Do not like Birds being poisoned - gotten  
by ferrets - ferrets Read pest and Rats;  
crops and foliage need to be well grown  
& not eaten down too much - Even Eco System  
D. S. online

fold  
here

You can also write or  
email your submission to:



Proposed Pest  
Management Plan  
Otago Regional Council  
Freepost 497  
Private Bag 1954  
Dunedin 9054



pests@orc.govt.nz



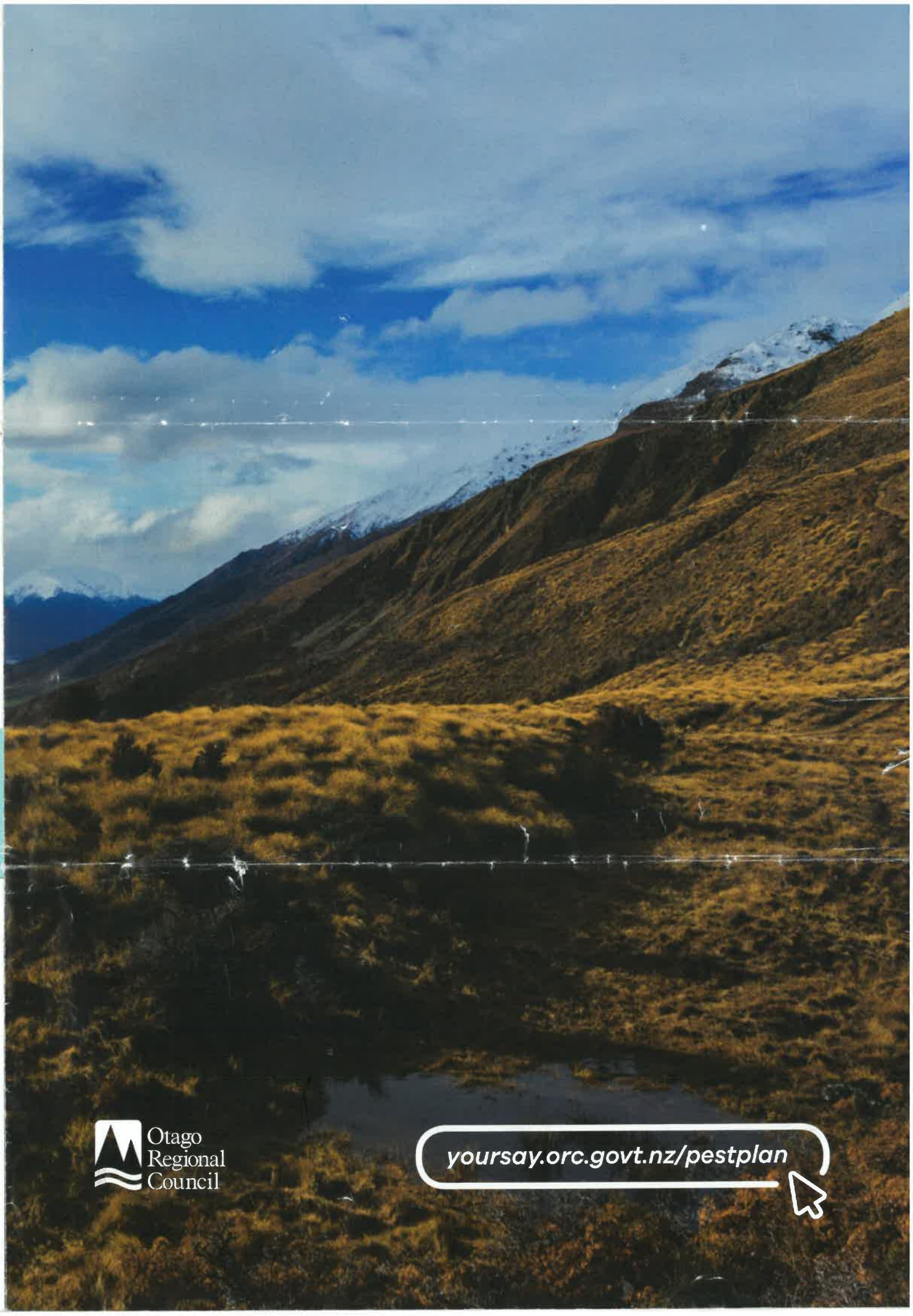
Free



Proposed Pest Management Plan  
Otago Regional Council  
Freepost 497  
Private Bag 1954  
Dunedin 9054



[yoursay.orc.govt.nz/pestplan](https://yoursay.orc.govt.nz/pestplan)



**SUBMISSION ON THE PROPOSED REGIONAL PEST  
MANAGEMENT PLAN FOR OTAGO**

**To:** Proposal for a Regional Pest Management Plan for Otago  
Otago Regional Council  
70 Stafford Street  
Private Bag 1954  
**DUNEDIN 9054**

**Sent by email to:** [pests@orc.govt.nz](mailto:pests@orc.govt.nz)

**Submitter:** Lake Dunstan Aquatic Weed Management Group  
C/- Boffa Miskell Ltd  
PO Box 110  
**CHRISTCHURCH 8140**

Attention: Marcus Girvan, Biosecurity Project Manager  
Phone: 03 364 4760  
Mobile: 027 276 9244  
Email: [marcus.girvan@boffamiskell.co.nz](mailto:marcus.girvan@boffamiskell.co.nz)

The Lake Dunstan Aquatic Weed Management Group (LDAWMG) makes the submissions on the Proposed Regional Pest Plant Management Plan (“the plan”) in the **attached** document.

The LDAWMG would like to be heard in support of its submission.



---

**David Mole (Group Chair)**  
Director Biosecurity/Biodiversity  
Land Information New Zealand  
Private Box 5501  
**WELLINGTON 6145**

Dated the 14th day of December 2018.

## **Introduction**

The Lake Dunstan Aquatic Weed Management Group (LDAWMG) was formed to agree an integrated approach to the management of lagarosiphon at Lake Dunstan, provide strategic oversight of the control programme and support the implementation of the Ten Year Management Plan for Lagarosiphon at Lake Dunstan 2016-2025.

The group comprises representatives from Land Information New Zealand, Contact Energy, Otago Regional Council, Central Otago District Council, Cromwell and Districts Community Trust, Guardians of Lake Dunstan, Otago Fish and Game Council and The Clutha Fisheries Trust.

The group is supported by the National Institute of Water and Atmospheric Research (NIWA), who provides technical advice on lagarosiphon management, and Boffa Miskell Limited (BML), LINZ's biosecurity strategic partner, who provides project management expertise including stakeholder consultation and the operational management of control activities.

The LDAWMG is responsible for setting the direction of work to be completed within the Ten Year Management Plan to:

- establish the desired outcomes required for the programme
- objectively evaluate and review options presented
- be champions and advocates for the programme within their organisations/groups
- identify and manage issues and risks and remove barriers for the implementation of the programme.

This submission is endorsed by the group and its members, and is submitted by Dave Mole (LINZ), Group Chair.



Specific Provision of the Plan	Submission	Decision sought from the regional council
Section 4.1 Organisms declared as pests and Table 2.	<p>The LDAWMG submits that the following species should be added to Table 2:</p> <ul style="list-style-type: none"> <li>• Egeria (<i>Egeria densa</i>)</li> <li>• Hornwort (<i>Ceratophyllum demersum</i>)</li> </ul> <p>The primary programme for egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should be exclusion from the Otago region.</p>	<ol style="list-style-type: none"> <li>1. Retain the list of organisms classified as 'pests' in Section 4.1: Table 2.</li> <li>2. Add the following species to Table 2: <ul style="list-style-type: none"> <li>• Egeria (<i>Egeria densa</i>)</li> <li>• Hornwort (<i>Ceratophyllum demersum</i>)</li> </ul> </li> <li>3. The primary programme for egeria (<i>Egeria densa</i>) and hornwort (<i>Ceratophyllum demersum</i>) should be exclusion from the Otago region.</li> </ol>
6.5.7 Site-led programme for lagarosiphon management areas	The LDAWMG supports Plan Objective 6.5.7 and Plan Rules 6.5.7.1 and 6.5.7.2.	1. Retain Plan Objective 6.5.7 and Plan Rules 6.5.7.1 and 6.5.7.2.
Plan Objective 6.5.7	The terms 'progressive containment' and 'sustained control' should be used in this objective for clarity and consistency.	<ol style="list-style-type: none"> <li>1. Amend the wording of Plan Objective 6.5.7</li> </ol> <p>Over the duration of the Plan actively manage lagarosiphon to:</p> <ol style="list-style-type: none"> <li>a) <del>progressively contain lagarosiphon in Lake Wanaka and the Kawarau River (Map 4 in Appendix 3) to reduce its extent over the next 10 years; reduce the extent of lagarosiphon in Lake Wanaka and the Kawarau River (Map 4 in Appendix 3) through progressive containment over the next 10 years.</del></li> <li>b) <del>sustainably control lagarosiphon in Lake Dunstan (Map 4 in Appendix 3); implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3).</del></li> <li>c) <del>prevent preclude</del> the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3);</li> <li>d) <del>prevent preclude</del> the establishment of lagarosiphon in lakes, <del>and</del> rivers and tributaries <del>excluding Lake Roxburgh and the Clutha River/Mata-au and its tributaries</del> where it is not already present</li> </ol>

		to avoid, mitigate or prevent effects on the environment, and amenity and recreational values.
Appendix 1 Organisms of Interest	The LDAWMG considers that egeria ( <i>Egeria densa</i> ) should be classified as an exclusion pest and be subject to controls in the Plan. Accordingly, the LDAWMG considers that egeria ( <i>Egeria densa</i> ) should be removed from the list of 'organisms of interest'.	1. Remove egeria ( <i>Egeria densa</i> ) from Appendix 1 and classify as a pest species.

## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

The specific amendments sought are listed below. Text to be deleted is shown as ~~strikethrough~~. Replacement text is shown underlined.

We also seek any consequential amendments necessary to give effect to the amendments sought.

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Section 2.1.2 – Wider biosecurity framework</b>	Under National strategies and programmes, 3 <sup>rd</sup> to last line, sentence starts “The proposal seeks to ....”  Please clarify whether this is that intended to mean “This proposed Otago Regional Pest Management Strategy....”?	The current terminology creates uncertainty.
<b>Section 2.2- Legislative Background</b>	The following statute and policy documents should be recognised and added to Section 2.2 “Legislative Background” of the plan.  <ul style="list-style-type: none"> <li>• Ngāi Tahu Claims settlement Act 2008</li> <li>• Kāi Tahu ki Otago Natural Resources Management Plan</li> <li>• Ngāi Tahu Freshwater Policy</li> </ul>	Kāi Tahu are partners to the Treaty of Waitangi and therefore this relationship should be acknowledged within statutory documents such as this pest management plan. A partnership relationship is not the same as that of a stakeholder.  Thus, the legislative background chapter of this plan should acknowledge Kāi Tahu as treaty partners and should also reference relevant Acts and Kāi Tahu Resource management policy documents to give effect to this relationship.
<b>Section 2.3.2 Resource Management Act Plans</b>	Reference should be made to planning documents recognised by an Kāi Tahu as an iwi authority such as:  <ul style="list-style-type: none"> <li>• Kāi Tahu ki Otago Natural Resources Management Plan (2005)</li> <li>• Ngāi Tahu Freshwater Policy</li> </ul>	This will be consistent with provisions of the RMA such as section 66.2(A)(a) that recognised planning documents be taken into account
<b>Section 2.4 Relationship with Māori</b>	This proposed plan is a policy instrument for the Otago Region. As such, after initial reference to Māori interests in a statutory context, the proposed plan should then specify that Māori interests in the Otago region are represented by the four	Adoption of this submission will differentiate between the generic term of Māori and the Kāi Tahu rūnaka who have mana whenua in the Otago region covered by this plan.

## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

	<p>rūnaka of Kāi Tahu ki Otago, being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otakou, and Hokonui Rūnanga.</p> <p>These rūnaka are the mana whenua of the region and should be defined as such. Further references to Māori should then be replaced with ‘mana whenua’</p>	
<b>Section 2.4 Relationship with Māori</b>	<p>Paragraph 2: The reference to ‘considering ways to help Māori to contribute’ should be amended in such a manner that the level of participation by Kāi Tahu ki Otago is consistent with sections 11.3 -11.5 (incl) of the Kāi Tahu ki Otago Natural Resources Management Plan (2005)</p>	<p>Taking into account the identified provisions of the Kāi Tahu ki Otago Natural Resources Management Plan (2005) will recognise Kāi Tahu ki Otago aspirations for the degree of participation proposed within the framework of this proposed plan</p>
<b>Section 2.4 Relationship with Māori</b>	<p>To recognise the Crowns responsibilities under the Treaty of Waitangi we submit that a mandated representative should be enabled on behalf of Kā Rūnaka to act in a capacity relevant Otago Regional Council governance board.</p>	<p>Kā Rūnanga have an intergenerational perspective and are concerned about the long term effects of the ORC Pest Management Plan on the mauri and mana of the environment around them.</p> <p>It is currently uncertain how Kāi Tahu ki Otago will be recognised as a treaty partner within the framework of the proposed pest management plan, hence the request for definitive representation in the decision making frameworks.</p>
<b>Section 6.3 Pests to be managed under progressive containment programmes</b>	<p>Currently <i>Undaria pinnatifida</i> (Undaria) is classified under the ‘Organisms of interest’ table in Appendix 1.</p> <p>We submit that Undaria should be reclassified and declared as a pest organism and subsequently managed under a ‘progressive containment’ programme.</p>	<p>Kāti Huirapa Rūnaka ki Puketeraki is concerned with the spread of undaria and sees it as more than a future potential threat – it is already threatening our mahika kai around our coastine (Huriawa and the East Otago Taiāpure area) and research carried out by the University of Otago Marine Science School has indicated that the presence of undaria has increased substantially over the last 10 years.</p> <p>We would like this to be reclassified to the “Progressive Containment” category because of the</p>



## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

		established and growing threat to our mahika kai and customary gathering of taonga species. Systematic monitoring of these invasive species has been on-going since the first discovery of Undaria in our takiwā and we consider that the ‘progressive containment’ approach is more fitting management approach.
<b>Plan Rule 6.4.6.2 (Designated Good Neighbour Rule)</b>	<p>The following text should be amended to allow for representative bodies to also initiate complaints.</p> <p>‘Explanation of rule: Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier and <u>affected representative bodies</u>’</p>	This plan rule should also be expanded to support any district wide farming initiative that targets integrated rabbit control measures over multiple adjoining farms. In the instance of such community initiatives the ORC should be required to assist in achieving collaboration across multiple properties, thus enables to initiate actions on behalf of the body representing the community initiative
<b>Section 7.0 Monitoring</b>	We support annual review of the management agencies performance as per s.7.2 as well as systematic monitoring of the plans effectiveness.	<p>Most of the things we do are dynamic processes and responses to living documents for management and governance will change intergenerationally.</p> <p>As such we support and require yearly review to ensure that our cultural, environmental, social and economic development interests are not being detrimentally impacted and/or there is no future breach of our post-settlement obligations and responsibilities as mana whenua within our recognised takiwā.</p>
<b>Section 8.3 Power to issue exemptions to plan rules</b>	We wish to have consideration under ‘Exemptions to Plan Rules’ to exercise our mana whenua rights to continue to customary harvest and use undaria as part of our customary gathering practices	Undaria has become a significant species for Kāti Huirapa for environmental and social reasons although it also recognised that Undaria has economic potential internationally. Undaria has also

**Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1**

		<p>been subject to locally initiated research initiatives and has been harvested and therefore managed in accordance with customary harvesting practices Undaria has useful properties in enhancing our māra kai (food gardens) which we are developing for sustainable food supplies under our climate change policy and we wish to continue in this practice both in our mara kai as well as hapū member gardens in our takiwā.</p> <p>This submission is based on section 78 (2)(b)(ii) of the Biosecurity Act 1993 which allows for exemptions to be granted if the council is satisfied that:</p> <p>‘the action taken on, or provision made for, the matter to which the requirement relates is as effective as, or more effective than, compliance with the requirement’</p> <p>Thus by making an exemption for customary harvest of undaria we will be able to enhance our ethic of guardianship over our ancestral areas. Furthermore, the ability to utilise this species in accordance with principles of informed sustainable management and the pursuit of food resilience will provide a means for enhanced environmental, social and economic outcomes for Kāti Huirapa Rūnaka ki Puketeraki.</p> <p>We note that other introduced species have been integrated into our customary harvesting practices over time, for example black swan egg harvests in Taumutu and Waihou has become a customary</p>
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## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

		practice and subject to management under tikanga Māori
<b>Section 8.3 Power to issue exemptions to plan rules</b>	We wish to have consideration under 'Exemptions to Plan Rules' to exercise our mana whenua rights to continue to customary harvest and use perennial nettle as part of our customary gathering.	<p>This submission is based on section 78 (2)(b)(ii) of the Biosecurity Act 1993 which allows for exemptions to be granted if the council is satisfied that:</p> <p><i>'the action taken on, or provision made for, the matter to which the requirement relates is as effective as, or more effective than, compliance with the requirement'</i></p> <p>Perennial nettle has become an important part of our customary harvests in the context of our mara kai and soil improvement products and therefore we want to maintain customary harvesting of this species.</p>
<b>Section 9.3.1 Effects on Māori</b>	<p>This statement is supported by Te Rūnanga o Ōtākou given the potential for pests to adversely impact upon taonga species and mahika kai.</p> <p>In the second paragraph Kāi Tahu should be changed to <u>Kāi Tahu ki Otago</u> in both instances</p>	Kāi Tahu values are aligned with initiatives that reduce the incidence of pests and predation on native species. Such initiatives can recognise the expression of kaitiakitaka or the customary duty of care for the natural environment and the biodiversity of flora and fauna within it.
<b>General</b>	To recognise the Crown's responsibilities under the Treaty of Waitangi we submit that a mandated representative should be enabled to represent Kā Rūnaka on the relevant Otago Regional Council governance board.	<p>Kā Rūnaka have an intergenerational perspective and are concerned about the long term effects of the ORC Pest Management Plan on the mauri and mana of the environment around them.</p> <p>It is currently uncertain how Kāi Tahu ki Otago will be recognised as a treaty partner within the framework of the proposed pest management plan, hence the request for definitive representation in the decision making frameworks.</p>

**Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1**

<b>General</b>	Prior to finalisation the document should be given to Aukaha to review the use of Kāi Tahu dialect and appropriate translations.	This will ensure that mana whenua dialect is reflected in policy documents pertaining to their ancestral takiwā
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## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<b>General:</b>	<p>We submit that all existing rūnaka and community partnerships, collaborations and management agreements currently held with Kā Rūnaka be respected and held independent from the Pest Management Plan as currently constituted.</p> <p>This submission relates to existing frameworks and agreements such as:</p> <p>Hikaroroa: An existing Pest Management partnership between Kāti Huirapa Rūnaka ki Puketeraki and DCC</p> <p>Huriawa: Co-managed/Partnership between Kāti Huirapa Rūnaka ki Puketeraki and DoC and Heritage New Zealand</p> <p>Other existing collaborations:</p> <ul style="list-style-type: none"> <li>• East Otago Taiāpure and Kāti Huirapa Rūnaka ki Puketeraki currently <b>collaborate</b> with local community preservation restoration groups (waterways and shorelines)</li> <li>• Existing DCC contract in the Waikouaiti forest area for replanting following recent DCC deforestation programme</li> </ul> <p>Again, it is submitted that these existing agreements are not subject to limitations that may be imposed by adoption of the Pest management plan, without negotiation and agreement between the parties to the existing agreements.</p>	<p>Such agreements currently accommodate to an extent values such as kaitiakitaka and rakatirataka, and recognise our treaty partner status.</p> <p>In terms of Huriawa, the existing relationship agreement is protected through the Ngāi Tahu Claims Settlement Act 1998, as well as the site being a recognised wāhi tapu under the Pouhere Taonga Heritage New Zealand Act 2014.</p>

## Submission of Kai Tahu Ki Otago on the Proposed Regional Pest Management Plan: Appendix 1

<p><b>General:</b></p>	<p>In any instances that will have a direct impact on recognised wahi tapu or cultural landscapes we recommend that the Kāi Tahu ki Ōtago Natural Resource Management Plan (2005) be referenced and taken into account.</p>	<p>Cultural landscapes such as Pukekura, Huriawa, Hikaroroa and the Moeraki/Kātiki Peninsula for example are significant to Kāi Tahu. Reference to the Kāi Tahu ki Otago Natural Resource Management Plan (2005) will provide guidance on associated values to inform decision making processes.</p>
<p><b>Glossary (p.105)</b></p>	<p>Kāi Tahu – descendants of Tahu, the tribe, <del>tangata whenua</del> <u>who maintain manawhenua within Otago and much of Te Waipounamu, the South Island.</u></p>	<p>The use of ‘tangata whenua’ in this context is not considered to be appropriate as it is a generic term that does not reflect the mana whenua status of Kāi Tahu in the Otago region.</p>
<p><b>Glossary (p.105)</b></p>	<p>Suggest addition of a definition for <u>Kāi Tahu ki Otago</u> as referenced below:</p> <p><u>Kāi Tahu ki Otago - The collective term Kāi Tahu ki Otago is used to describe the four Papatipu Rūnaka and associated whānau and rōpū of the Otago region, The four Rūnaka are Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.</u></p>	<p>This addition will differentiate between the overall tribal structure that is Kāi Tahu and the more localised tribal interests as represented by the four runaka of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.</p>



Our reference: A441798  
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11 December 2018

Proposed Pest Management Plan  
Otago Regional Council  
70 Stafford Street  
Private Bag 1954  
Dunedin 9054

Dear Sir/Madam

***Environment Southland (ES) Submission on Otago Regional Council (ORC) Proposed Pest Management Plan***

ES commends Otago Regional Council on the development of its proposed Biosecurity Strategy (the Strategy) and the proposed Otago Regional Pest Management Plan (the Plan). ES appreciates the significance of these documents for pest management within and around the region. ES would like to acknowledge the collaborative approach undertaken by ORC to ensure issues of shared interest were discussed with ES throughout the development the Strategy and the Plan.

ES is supportive of the Plan and the Strategy and particularly supports ORC's commitment to eradicate Wallabies and Rooks. Eradication in the Otago region will contribute to the success of ES's exclusion programmes for these species.

ES notes that the Strategy addresses marine pest management approaches and acknowledges ORC's position on marine pests. ES also supports the development of national and multi-regional marine pest approaches. In the absence of national or multi-regional approaches, ES considers that the Plan should include enforceable rules on marine pests to prevent their movement across the coast. This is especially important now that the haul-out facility at Port Otago has been closed. Bluff has one of the only alternative facilities for haul-out and we are expecting to see an increase in vessel traffic through Otago into Southland for maintenance. This increases the risk of contamination and the transfer of marine pests such as *Styela clava*, which ES is proposing to exclude from Southland.

ES would like to see more information on the costs and benefits of managing Moth Plant and False Tamarisk. ES also seeks clarification of the exemption of planted conifer blocks less than 1 ha on page 45 of the Plan. ES is interested in reasoning for why the Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 do not include the exemption.

For now  
& our future

ES would also highlight that the proposed regional pest management plans of Southland and Otago share similar monitoring measures. Hence ES supports monitoring measures specified in the Plan. ES has a particular interest in the idea of “aerial monitoring: for both Gorse and Broom and what this approach could involve.

Lastly, ES notes that the scientific name of African Feather Grass is now “*Cenchrus macrourus*” not “*Pennisetum macrourum*”.

ES looks forward to collaborating with ORC in the future for efficient pest management in both Southland and Otago regions.

ES would like to speak to its submission if there is an opportunity to be heard.

Yours sincerely

A handwritten signature in black ink, appearing to be 'A Meade', with a long horizontal stroke extending to the right.

Ali Meade  
**Biosecurity and Biodiversity Operations Manager**