

19 SEPTEMBER 2019

ITEM 10.7 - RECOMMENDATIONS FROM THE HEARING PANEL ON THE REGIONAL PEST  
MANAGEMENT PLAN AND BIOSECURITY STRATEGY REVIEW

APPENDICES

Appendix 1 – Plan, Tracked Text Version

Appendix 1a – Strategy, Tracked Text Version

Appendix 1b – Plan

Appendix 1b – Strategy

Appendix 2 – Pest Plan Communications and Engagement Strategy

Appendix 2 – Summary of Panel Recommendations

Appendix 3 – Panel Minutes

Appendix 4 - Assessment 73 74 of the Act

Appendix C – Public Notice



Otago  
Regional  
Council

# OTAGO REGIONAL PEST MANAGEMENT PLAN 2019-2029

Explanatory note:

Additions are illustrated with underlining. Deletions are illustrated with ~~strikethrough~~.



## Foreword

The ecosystems and landscapes across our large and diverse region are unique and provide benefits to us both economically and environmentally.

Many of New Zealand's introduced species have significant effects on our environment, biodiversity and economy. Pests such as rabbits, wallabies, gorse, broom, ragwort and nassella tussock have an adverse effect on our production land, impacting our economy and rural communities.

Our landscape, amenity and recreation values are affected by the spread of wilding conifer trees, and aquatic weeds like lagarosiphon. Our environment and habitats of indigenous species are impacted by pest plants such as old man's beard, which smothers and kills native vegetation, and predator pests which kill our indigenous wildlife.

The Biosecurity Act 1993 is the national legislation that sets out how central government and regional councils deal with pests and unwanted organisms in New Zealand. It enables regional councils to develop regional pest management plans to control and manage pests in their region by setting objectives and rules.

~~Otago Regional Council has a long history of managing pests in our region. The last Pest Management Plan took effect in 2009. Since this time, changes to the Biosecurity Act 1993 and the introduction of the National Policy Direction for Pest Management 2015 mean there are new requirements Otago Regional Council must meet.~~

The ~~Proposed~~ Otago Regional Pest Management Plan identifies ~~49~~ 51 species to be managed by land occupiers, often with the involvement of Otago Regional Council. It builds on the 2009 Pest Management Plan by introducing new objectives and rules for a range of new species including wilding conifers, wild Russell lupin, and other plant and predator pests, and introduces new rules and controls for many of the existing species such as rabbits and gorse and broom.

In developing the ~~Proposed~~ Otago Regional Pest Management Plan, as well as ensuring this meets the new Biosecurity Act requirements, the council has consulted and engaged with many different stakeholders, groups and individuals. Their feedback has shaped our ~~Proposed Pest Management~~ Plan, and our associated Biosecurity Strategy. Together these seek to protect the things we treasure from the impacts of harmful organisms.

Thank you to all those who have contributed their feedback to this review and have assisted in developing the ~~Proposed~~ Otago Regional Pest Management Plan.

A handwritten signature in black ink, appearing to read 'S Woodhead', written in a cursive style.

Stephen Woodhead

Chairman

Otago Regional Council

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## Otago Regional Council Regional Pest Management Plan

There are five programmes that are used to manage pests in Otago

**Exclusion Programmes:** to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet in an area.

<b>Plants</b>	<u>African feather grass</u>	<u>Chilean needle grass</u>	<u>Egeria</u>
	<u>False tamarisk</u>	<u>Hornwort</u>	<u>Moth plant</u>

**Eradication Programmes:** to reduce the infestation of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term.

<b>Plants</b>	<u>Spiny Broom</u>		
<b>Animals</b>	<u>Bennett's wallaby</u>	<u>Rook</u>	

**Progressive Containment Programmes:** to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time.

<b>Plants</b>	<u>African love grass</u>	<u>Bomarea</u>	<u>Boneseed</u>
	<u>Bur daisy</u>	<u>Cape ivy</u>	<u>Nassella tussock</u>
	<u>Old man's beard</u>	<u>Perennial nettle</u>	<u>Spartina</u>
	<u>White-edged nightshade</u>	<u>Wilding conifers</u>	

**Sustained Control Programmes:** to provide ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties.

<b>Plants</b>	<u>Broom</u>	<u>Gorse</u>	<u>Nodding thistle</u>
	<u>Ragwort</u>	<u>Wild Russell lupin</u>	
<b>Animals</b>	<u>Feral rabbits</u>		

**Site-led Programmes:** that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place.

<b>Plants</b>	<u>Banana passionfruit</u>	<u>Chilean flame creeper</u>	<u>Darwin's barberry</u>
	<u>Gunnera</u>	<u>Lagarosiphon</u>	<u>Sycamore</u>
	<u>Tradescantia (wandering willie)</u>		
<b>Animals</b>	<u>Bennett's wallaby</u>	<u>Feral cat</u>	<u>Feral deer (incl. hybrids)</u>
	<u>Feral goat</u>	<u>Feral pig</u>	<u>Hedgehog</u>
	<u>Mustelids (ferret, stoat, weasel)</u>	<u>Possum</u>	<u>Rat (Norway, ship and Kiore)</u>

The maps illustrating the site-led areas are provided in Appendix 3 to the Plan.

In accordance with section 100B of the Biosecurity Act 1993, Otago Regional Council will prepare an Operational Plan to implement this Regional Pest Management Plan. This Operational Plan will be reviewed annually in accordance with the Act and the monitoring principles outlined in Section 7 of this Plan.

# PART ONE: PLAN ESTABLISHMENT

*Broom*



# 1. INTRODUCTION

## 1.1 ~~PROPOSAL FOR A REGIONAL PEST MANAGEMENT PLAN FOR OTAGO~~

~~Otago Regional Council (ORC) has a regional leadership role under the Biosecurity Act 1993 (the Act) and intends to establish a Regional Pest Management Plan (the Plan/Proposal). The first formal step is notification of the Proposed Regional Pest Management Plan for the Otago Region for 10 years. This builds on the 2009-2019 Pest Management Strategy for Otago and previous pest management programmes.~~

~~This document has been prepared in accordance with Part 5 of the Act. It forms the Proposal required to be developed by ORC to “make” the Regional Pest Management Plan for Otago. When the new Plan commences it will replace the existing Pest Management Plan.~~

~~In conjunction with the Plan, ORC has also prepared a Biosecurity Strategy (the Strategy) which sets out ORC’s objectives for biosecurity management in the region using the full range of statutory and non-statutory tools available. How ORC manages biosecurity, including the management of organisms capable of causing adverse or undesirable effects is covered in the Biosecurity Strategy. The Biosecurity Strategy discusses all tools available to ORC, both regulatory and non-regulatory, to manage biosecurity risks for any organism, not just those formally specified as pests in the proposed Regional Pest Management Plan.~~

~~ORC is undertaking consultation on the Proposal and will notify the Proposal for public submissions during the period of 1 November and 14 December 2018. A hearing panel will hear submissions received on the Proposal. Following the hearing, ORC will release a written report, which will set out its decisions on the Plan and the reasons for accepting or rejecting the submissions on the Proposal. Any person who made a submission on the Proposal may make an application (similar to an appeal) to the Environment Court on any aspect of the Plan.~~

## 1.2 PURPOSE OF THE PLAN

Regional councils have a mandate under Part 2 of the Biosecurity Act 1993 to provide regional leadership in activities that prevent, reduce, or eliminate adverse effects from harmful species that are present in their region. Otago Regional Council (ORC) holds this role in the Otago region.

The purpose of the ~~proposed~~ Plan is to outline the framework to efficiently and effectively manage or eradicate specified organisms in the Otago region. Doing so will:

- minimise the actual or potential adverse or unintended effects associated with those organisms; and
- maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach.

Many organisms in the Otago region are considered undesirable or a nuisance. This Plan manages pests where individual action or inaction in managing pests imposes undue economic, social, cultural or environmental effects and where efficient and effective pest control methods are available.

The Act has prerequisite criteria that must be met to justify such intervention. ~~This proposal identifies those organisms classified as pests to be managed through the Plan.~~

~~Once operative, the~~ The Plan will empower the ~~Otago Regional Council~~ORC to exercise the relevant advisory, service delivery, regulatory, monitoring and funding provisions available under the Act to deliver the specific objectives identified in Part Two: Pest Management.

~~The public can make submissions on the proposed Plan. The ORC will issue decisions after reviewing these submissions. Decisions can be appealed through the Environment Court.~~

### 1.3 DURATION

The ~~proposed~~ Plan will take effect on the date on which the ORC affixes its seal and it becomes operative as a Regional Pest Management Plan under section 77 of the Act. It is proposed to remain in force for a period of 10 years following it becoming operative. The Plan may cease at an earlier date if the ORC declares by public notice that the objectives of the Plan have been achieved. It may also cease at an earlier date if, following a review, it is revoked. A review of the Plan as a whole must be undertaken after 10 years.

### 1.4 COVERAGE

The ~~proposed~~ Plan will operate within the administrative boundaries of the Otago region and covers a total area (land and sea) of approximately 32,000km<sup>2</sup> (see map below). The exclusion, eradication, progressive containment and sustained control programmes outlined in the Plan apply to the entire Otago region unless a specific, smaller area is described within the relevant programme.

### 1.5 THE BIOSECURITY STRATEGY

In conjunction with the Plan, ORC has also prepared a Biosecurity Strategy (the Strategy) which sets out ORC's objectives for biosecurity management in the region using the full range of statutory and non-statutory tools available. How ORC manages biosecurity, including the management of organisms capable of causing adverse or undesirable effects is covered in the Biosecurity Strategy. The Biosecurity Strategy discusses all tools available to ORC, both regulatory and non-regulatory, to manage biosecurity risks for any organism, not just those formally declared as pests in the Plan.

Figure 1: The Otago Region



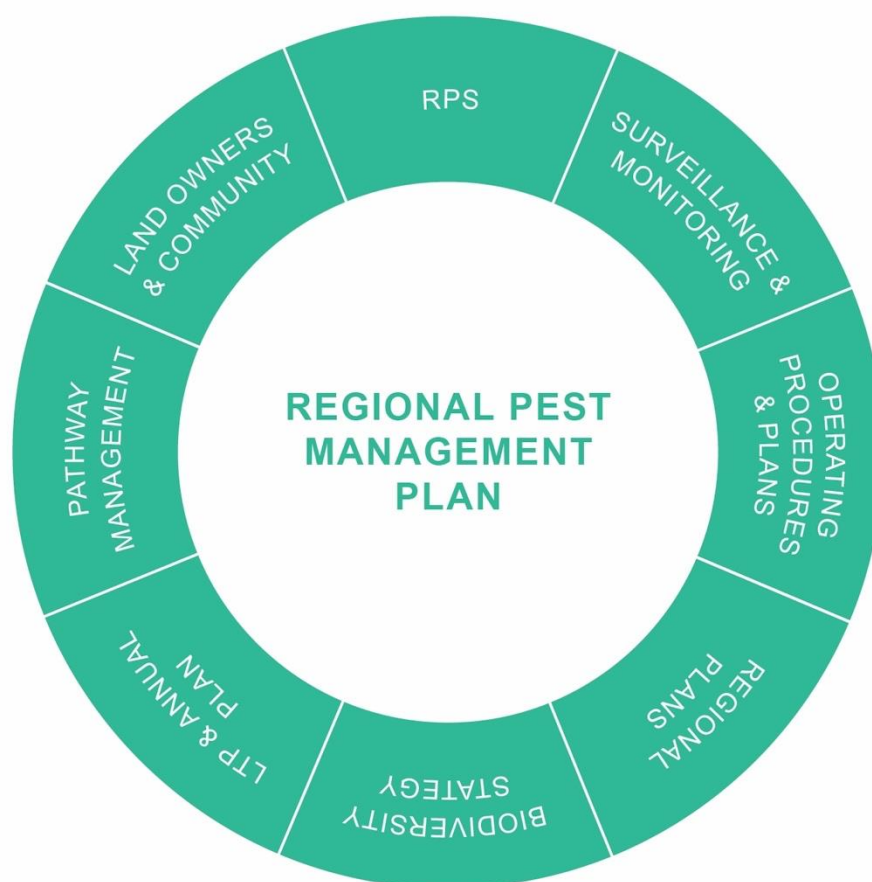
## 2. PLANNING, STATUTORY AND STRATEGIC BACKGROUND

### 2.1 STRATEGIC BACKGROUND

#### 2.1.1 Otago Regional Council's biosecurity framework

Regional pest management sits within an integrated biosecurity framework for the Otago region. The Plan is supported by a number of complementary policies, plans, duties and functions, as illustrated in Figure 2 below. Landowners and/or occupiers and the wider community, either as beneficiaries or exacerbators (the person aggravating or contributing to a particular pest management problem by action or inaction) or both interact with these policies, plans, duties and functions.

Figure 2: Otago Regional Council's Biosecurity Framework



**Proposed Biosecurity Strategy:** ~~At the same time as notifying the Plan, feedback will be sought on the proposed Biosecurity Strategy (the Strategy).~~ The purpose of the Biosecurity Strategy is to set out the ~~Otago Regional Council's~~ ORC's wider biosecurity approach and to prioritise a programme of action to be implemented for effective biosecurity management across the Otago region.

The Biosecurity Strategy is a non-regulatory document that has been prepared by the ORC as part of a 'whole of Council approach' for biosecurity in the Otago region. It integrates the

ORC's statutory and non-statutory biosecurity functions, including guiding the delivery, monitoring and review of the Plan ~~once operative~~.

**Regional Policy Statement and Regional Plans:** The Regional Policy Statement for Otago (RPS) and the Regional Water and Coast plans contain objectives, policies, rules and methods that support and complement the Plan.

In particular, the RPS contains policies and methods to:

- Control the adverse effects of pest species, prevent their introduction and reduce their spread, particularly where pests adversely affect lakes, rivers and wetlands, the coastal environmental, soil, ecosystems and indigenous biodiversity;
- Control the adverse effects of pest species, prevent their introduction and reduce their spread to safeguard indigenous species and their habitats, ecosystem services that support economic activities, water quality and quantity, soil quality, human and animal health, recreation values, landscapes, seascapes and natural character;
- Encourage, facilitate and support activities which control pests; and
- Prioritise pest management activities in areas of significant indigenous biological diversity and habitats of significant fauna.

**Long Term and Annual Plan:** The Otago Regional Council Long Term Plan (LTP) and the Annual Plan are developed by the ORC in accordance with the Local Government Act 2002 (LGA) and Local Government (Rating) Act 2002. These plans guide the spending of rates, including spending for biosecurity purposes. The Annual Plan sets out the annual operational budgets for the ORC's biosecurity functions.

**Otago Regional Council Biodiversity Strategy:** The Biodiversity Strategy is a high-level document prepared in accordance with the ~~Local Government Act 2002~~ LGA. The Strategy guides how the ORC will support the maintenance of indigenous biological diversity in the region.

The Biodiversity Strategy outcomes seek to reduce the impact of pests on indigenous species, provide more pest management information and support community-led initiatives.

**Operational plans and procedures:** The Act requires that an operational plan be prepared and reported on annually in accordance with section 100B. An operational plan sets out how the Plan is to be implemented and the report on the operational plan sets out ORC's progress towards meeting the Plan objectives.

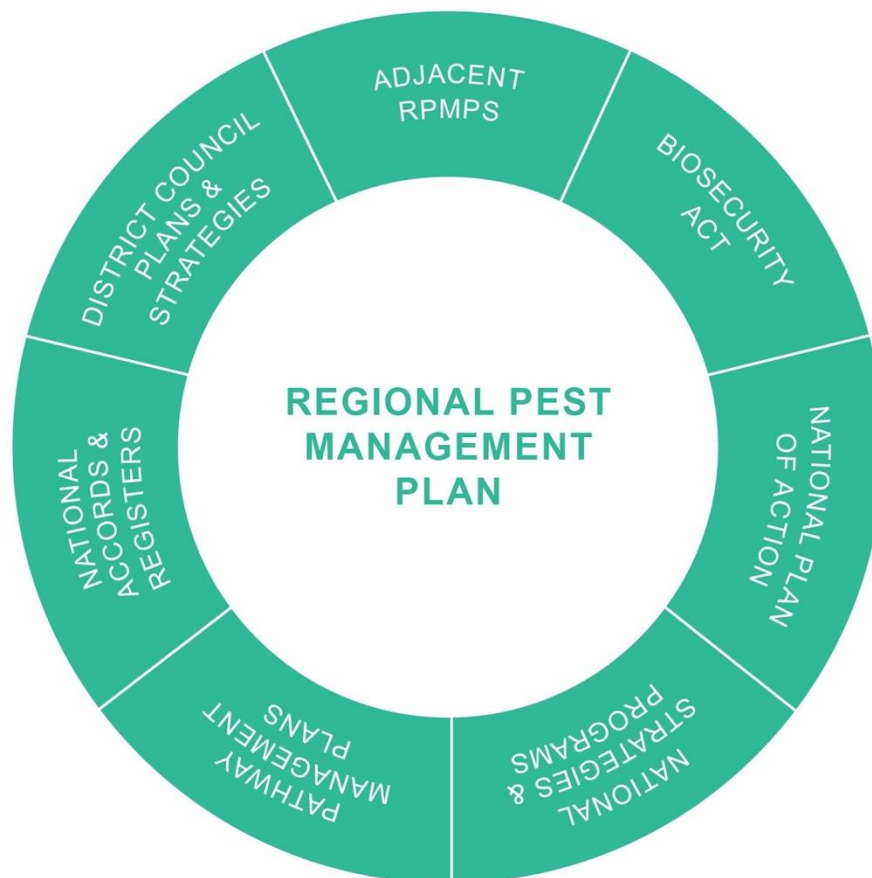
**Surveillance and monitoring program:** ~~Otago Regional Council~~ ORC undertakes monitoring and surveillance activities in order to measure the progress made in managing pests. This may also include monitoring the Organisms of Interest in Appendix 1, and any other organisms that may present a threat to the region.

**Pathway management plans:** Like pest management plans, the Act enables the establishment of pathway management plans which focus on managing the movement and incursion routes of pests. These can be established at a regional or national level. No national pathway management plans are currently in place. No pathway management plan is proposed for Otago at this stage, but this will be explored in the future in accordance with the ~~proposed~~ Biosecurity Strategy.

### 2.1.2 Wider biosecurity framework

An effective biosecurity framework not only works at a regional level, but at a local and national level. Central Government is responsible for preventing pests from entering New Zealand and providing national leadership, coordination and implementation of pest incursions for eradication purposes. Other regional pest plans, pathway management plans and national legislation, policy and initiatives influence the Plan. The plans and strategies of territorial authorities also have a complementary role in biosecurity. As a result, a regional pest management plan is an integral component of a comprehensive biosecurity framework that protects New Zealand's environmental, economic, social and cultural values from pest threats.

Figure 3: Wider biosecurity framework



**District council plans and strategies:** There are a number of district council plans and strategies that are relevant to the Plan and ~~have been~~ were taken into account during its development. In particular,

- The Dunedin City Council Environment Strategy 2016 seeks that pest management activities benefit Dunedin's natural ecosystems and that the best technology is used to manage pests.

- The Waitaki Biodiversity Strategy 2014 seeks to support community and voluntary actions for pest management, work collaboratively with other agencies, and to provide information on pest control and prevention measures.
- The Queenstown Lakes District Council Parks and Open Space Strategy 2017 seeks collaborative action on pest management activities in the district, and The Wakatipu Wilding Conifer Control Strategy 2013-2017 outlines goals and actions to manage wilding conifers in the district.

**Adjacent regional pest management plans:** The Canterbury, West Coast and Southland regions adjoining the Otago region also have regional pest management plans in place ~~or under review~~ that are relevant to the Otago Plan. This includes the Fiordland Regional Marine Pest Pathway Plan which restricts the spread of marine pests into Fiordland.

**National accords and registers:** The National Pest Plan Accord (NPPA) and National Pest Pet Biosecurity Accords (NPPBA) are cooperative agreements. The NPPA have agreements between Ministry for Primary Industries (MPI), Department of Conservation (DoC), regional councils and New Zealand Plant Producers Incorporated. The NPPBA have agreements between Ministry for Primary Industries (MPI), DoC, regional councils, Pet Industry Association and the New Zealand Companion Animal Council. The approximately 207 plant species identified in the NPPA are declared Unwanted Organisms in accordance with Part 9 of the Biosecurity Act and banned from propagation, sale and distribution. The NPPBA seeks to regulate the domestic trade of high-risk pets and encourage responsible pet ownership.

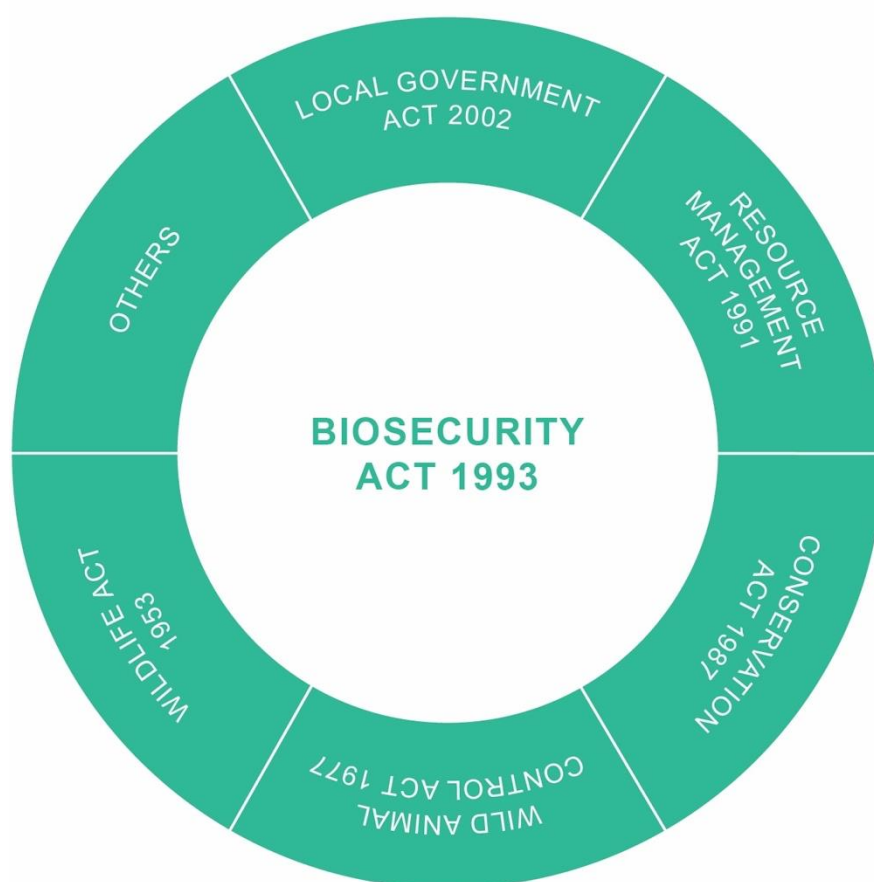
**National plan of action:** The Pest Management National Plan of Action sets out a number of national improvements to improve how pest management is implemented across the country including improving collective action and consistency, goal setting and measurement and pest management outcomes overall.

**National strategies and programmes:** The New Zealand Wilding Conifer Management Strategy 2015 – 2030 sets objectives to improve the management of wilding conifers at a national level. The New Zealand Biodiversity Action Plan 2016 and the Predator Free 2050 Programme set ambitious goals to manage the effects of pests (particularly animal predators) on indigenous biodiversity. ~~The proposal Plan~~ seeks to support these national objectives by managing pest species that impact on biodiversity and indigenous flora and fauna. MPI's Freshwater Biosecurity Partnership Programme aims to reduce the spread and impacts of freshwater pests, increasing understanding of freshwater pests among all freshwater users and for freshwater users to adopt behaviour that prevents the spread of pests. MPI's Velvetleaf Management Programme aims to stop the spread of velvetleaf within and between farms, increase knowledge on how to effectively manage this weed and to support landowners and rural contractors to control velvetleaf.

## 2.2 LEGISLATIVE BACKGROUND

There are a number of different Acts that govern regional council functions and duties. Pest management is not dependent on one particular statute, however the Biosecurity Act 1993 is the key legislative instrument to efficiently and effectively manage specified harmful organisms through the development and implementation of regional pest management plans. This is supported by other legislative statutes which supports effective pest management in the region.

Figure 4: Biosecurity legislation



### 2.2.1 Biosecurity Act 1993

The Act is purpose-built for pest management. A regional council can use the Biosecurity Act to exclude, eradicate or effectively manage pests in its region, including unwanted organisms. A regional council is not legally obliged to manage pests, unless it chooses to do so. As such, the Act's approach is enabling rather than prescriptive. It provides a framework to gather intervention methods into a coherent system of efficient and effective actions.

A number of amendments have occurred since 1993. Changes of relevance to regional pest management, and particularly advanced through the Biosecurity Law Reform Act 2012, include:

- Regional pest management strategies are to be redeveloped as regional pest management plans. Provision has also been made for explicit pathway management plans in addition to specified pest management plans.
- The Crown will be bound to the requirements of the Good Neighbour Rules (GNRs) specified in a regional pest management plan. Such rules apply to all occupiers within the area over which the rules apply but they can only address pests spread across a property boundary.



- The Act provides for the National Policy Direction for Pest Management 2015 (NPD). Regional pest management plans must not be inconsistent with the NPD. Further details of the NPD are provided under section 2.2.2 below.
- A mandatory plan review need not occur before 10 years. However, review of a whole plan or part of a plan can take place at any time if necessary.

Three sections of the Act are particularly pertinent to regional councils:

## **Part 2: Functions, Powers and Duties in a Leadership Role**

Regional councils are mandated under Part 2 (functions, powers and duties) of the Act to provide regional leadership for biosecurity activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in its region.

Section 12B(1) of the Act sets out how regional councils provide leadership. It includes ways that leadership in pest management issues can help to prevent, reduce or eliminate adverse effects from harmful organisms. Some of these activities include helping to develop and align regional pest management plans and regional pathway management plans in the region, promoting public support for managing pests, and helping those involved in managing pests to communicate and cooperate so as to make programmes more effective, efficient, and equitable.

Section 13(1) of the Act sets out powers that support regional councils in this leadership role. This includes:

- Monitor and survey pests, pest agents, and unwanted organisms;
- Provide for the assessment and eradication or management of pests in accordance with relevant pest management plans;
- Prepare proposals for, “make” and implement regional pest management plans;
- Appoint a management agency for a plan;
- Disallow an operational plan or part of it;
- Review, amend, revoke and replace, or revoke a plan;
- Declare and implement small-scale management programmes, and
- Gather information, keep records and undertake research.

## **Part 5: Pest Management**

Part 5 of the Act specifically covers pest management, including regional pest management. Its purpose is to provide for the eradication or effective management of harmful organisms. A harmful organism is assigned pest status when it is included in a regional pest management plan. Sections 69–78 of the Act prescribe the process for developing regional pest management plans, involving six steps from initiating a plan (by a proposal), to ensuring affected parties are consulted, and develop efficient regulatory and funding mechanisms.

While a regional council may initiate a regional pest management plan, it is also required to assess and undertake decision-making responsibilities in relation to all proposed pest management plans put forward by any another person or organisation.

## Part 6: Administering a Regional Pest Management Plan

Once a regional pest management plan has commenced, the management agency specified in the plan may exercise the powers in Part 6 of the Act to implement the plan where the plan provides for the agency to exercise the power. These powers include the necessary regulatory powers, instruments and cost recovery mechanisms needed for administering the plan.

### 2.2.2 National Policy Direction for Pest Management 2015

The Act provides for the National Policy Direction for Pest Management 2015 (NPD). The purpose of the NPD is to ensure that activities under Part 5 of the Act (Pest Management) provide the best use of available resources for New Zealand's best interests, and align with each other (when necessary), to contribute to the eradication or effective management of harmful organisms present in New Zealand (the purpose of Part 5). The NPD does this by:

- (a) clarifying requirements for Part 5 regulatory instruments; and
- (b) ensuring consistent application of these requirements nationally and between regions, as appropriate.

Regional pest management plans must not be inconsistent with the NPD, which requires that:

- Objectives must follow a prescribed content;
- Management outcomes must align with one of five programmes: Exclusion, Eradication, Progressive Containment, Sustained Control or Site-led;
- Benefits and costs must be analysed in a prescribed manner and must be documented;
- Allocation of costs must be analysed in a prescribed manner; and,
- The construction of ~~Good Neighbour Rules~~ GNRs must address specified criteria.

Table 1: NPD requirements and the steps taken to comply with them

NPD requirements	Steps taken to comply
Objectives are set	The structure of the objectives used in Section 5 of Part 2 of the <u>Proposal Plan</u> align with the requirements of clause 4 of the NPD.
The use of programmes	The types of programmes (described in Part 2 of the Proposal) match those set out in clause 5 of the NPD.
Benefits and costs are analysed	An analysis of the costs and benefits has been undertaken in accordance with clause 6 of the NPD. <del>The results are summarised in Section 9 of this Proposal and the full analysis is published in the reports <i>Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits October 2018 and Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management</i></del>

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	<u>2015: Additional analysis of costs and benefits August 2019 (the CBA Reports).</u>
Funding rationale is noted	<del>Checked the</del> The funding rationale described in Section 9 of the <del>Proposal Plan</del> has been developed in line with clause 7 of the NPD.
Good Neighbour Rules are described	GNRs have been developed in line with clause 8 of the NPD. <del>Feedback was sought from Department of Conservation and Land Information New Zealand.</del>

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### 2.2.3 Resource Management Act 1991

Regional councils have functions and duties under the Resource Management Act 1991 (RMA) to sustainably manage the natural and physical resources of the region, including the Coastal Marine Area (CMA). These responsibilities include sustaining the potential of natural and physical resources, safeguarding life-supporting capacity and protecting environmentally significant areas and habitats (section 5(2) and section 6(c)).

The RMA sets out the functions of regional councils in relation to the maintenance and enhancement of ecosystems in the CMA of the region (section 30(1)(c)(iia)), the control of actual or potential effects of use, development or protection of land (section 30(1)(d)(v)), and the establishment, implementation and review of objectives, policies and methods for maintaining indigenous biological diversity (section 30(1)(ga)).

The focus of the RMA is on managing adverse effects on the environment through regional policy statements, regional and district plans, and resource consents. The RMA, along with regional policies and plans can be used to manage activities so that they do not create a biosecurity risk or those risks are minimised. While the Biosecurity Act is the main regulatory tool for managing pests, there are complementary powers within the RMA that can be used to ensure the problem is not exacerbated by activities regulated under the RMA.

The Biosecurity Act cannot over-ride any controls imposed under the RMA, for example, bypassing resource consent requirements.

### 2.2.4 Local Government Act 2002 and Local Government (Rating) Act 2002

The ~~Local Government Act 2002~~ (LGA) provides “a framework and powers for local authorities to decide which activities they undertake and the manner in which they will undertake them”. The Local Government (Rating) Act 2002 is a companion Act, which provides local authorities with flexible powers to set, assess, and collect rates to fund local government activities; ensures rates are set in accordance with decisions that are made in a transparent and consultative manner; and enables ratepayers to identify and understand their liability for rates.

Both of these Acts support the ~~Otago Regional Council~~ ORC’s biosecurity activities, particularly through the ORC’s ability to access rates as a funding source and to differentiate rates into both general and targeted categories.

## 2.2.5 Wild Animal Control Act 1977 and the Wildlife Act 1953

The Wild Animal Control Act 1977 and the Wildlife Act 1953, the Freshwater Fisheries Regulations 1983 (both administered by the Department of Conservation) have a role in relation to managing animals.

- (a) The Wild Animal Control Act 1977 (WAC Act) controls the hunting and release of wild animals and regulates deer farming and the operation of safari parks. The Wild Animal Control Act 1977 empowers the Department of Conservation to control wild deer, chamois, thar, wild goats and wild pigs. It also gives local authorities the power to destroy wild animals under operational plans that have the Minister of Conservation's consent.
- (b) The Wildlife Act 1953 (WL Act) controls and protects wildlife not subject to the WAC Act. It identifies which wildlife are not protected (e.g., mustelids, possums, wallabies, rooks, feral cats); which are to be game (e.g., mallard ducks, black swan); and which are partially protected or are injurious.
- (c) The Freshwater Fisheries Regulations 1983 place controls on people who possess, control, rear, raise, hatch or consign noxious fish without authority.

## 2.2.6 Other legislation

Other legislation, such as the Reserves Act 1977 and the Conservation Act 1987, contain provisions that support pest management within a specific context. The role of regional councils under such legislation in relation to pest management is limited to advocacy.

## 2.3 RELATIONSHIP WITH OTHER PLANS AND REGULATIONS

### 2.3.1 Pest Management Plans

~~The Proposal~~ A regional pest management plan must not be inconsistent with:

- (a) any national pest management plan or regional pest management plan that is focused on the same organism; or
- (b) any pathway management plan; or
- (c) any regulation.

There are no known inconsistencies with other pest management plans on the same organism or any pathway management plan. A number of organisms included in the Canterbury, West Coast and Southland councils' ~~current~~ regional pest management ~~strategies~~ plans are not included in this Plan Proposal. However, the test is in relation to any other pest management plan on the same organism. If the organism is not in the Plan Proposal, then there is no inconsistency.

Possums and mustelids are subject to the National Pest Management ~~Strategy Plan~~ Strategy Plan for Bovine Tuberculosis (TB). The objective for the National ~~Strategy Plan~~ Strategy Plan is the eradication of TB. This affects the context for each region and does not constitute an inconsistency between plans.

### 2.3.2 Resource Management Act Plans

The ~~Plan Proposal~~ must not be inconsistent with the Otago Regional Policy Statement (RPS) or any regional plan developed in accordance with the RMA. The RPS signals that

ORC will address pest management issues through a regional pest management plan developed under the Act. There is no inconsistency between the Plan Proposal and the RPS.

### 2.3.3 Regulations

There are no known inconsistencies with any regulations.

## 2.4 RELATIONSHIP WITH MĀORI

One specific purpose of a regional pest management plan under the Act is to provide for the protection of the relationship between Māori and their ancestral lands, waters, sites, wāhi tapu, and taonga, and to protect those aspects from the adverse effects of pests. Māori involvement in biosecurity is an important part of exercising kaitiakitaka. Māori also carry out significant pest management through their primary sector economic interests and as land owners and/or occupiers.

The LGA requires councils to recognise and respect the Crown's responsibilities under the Tiriti o Waitangi - Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes considering ways to help Māori to contribute. These responsibilities and requirements were met while preparing this Plan and will continue after it takes effect.

In Otago, the Kāi Tahu ki Ōtago Natural Resource Management Plan 2005 outlines particular issues in relation to pest management and biodiversity and includes particular areas or sites of value. Using this plan as a basis, ongoing consultation will be maintained during the life of the Plan to discuss pest species that are having an impact on sites of value to rūnanga.

Ongoing consultation is also required to ensure implementation of the Plan provides for the customary harvesting of species.

## 2.5 CONSULTATION OVERVIEW

~~This Plan proposal has been prepared to provide opportunity for public feedback and submissions as part of the formal consultation process under the Act. A hearing will be held to consider all submissions prior to the "making" of the Plan and its approval by ORC.~~

~~The Plan proposal is the outcome of the review of the existing Pest Management Strategy 2009, which has included opportunities for informal feedback by the public and stakeholders.~~

~~Stakeholder engagement on the development of a new Regional Pest Management Plan commenced in October 2017.~~

~~A stakeholder forum on biodiversity and pest management was held on 31 October 2017. This provided information about developing the new Plan and sought feedback on pest management issues in Otago. 42 stakeholders and partners from local government, statutory authorities, Kāi Tahu, environmental groups and industry groups attended the session.~~

~~ORC also held pop-in sessions in four locations across the region. These pop-in sessions were held in Cromwell, Dunedin, Balclutha and Oamaru. The purpose of the pop-in sessions was to provide an opportunity for people to provide their feedback in person~~

about what should be included in the new Plan and what the ORC should be doing more of to manage pests in Otago.

During November 2017, the Otago Regional Council ORC webpage also included an online questionnaire. This sought people's views on the important pest management issues in Otago, pests in the current Pest Management Strategy, pests they may wish to see in the new Plan, and any other comments they had about pest management in Otago.

Feedback received during this period was summarised and published in December 2017 *A summary of community feedback on the development of a new Regional Pest Management Plan for Otago*. This feedback informed the development of the Plan and the supporting Biosecurity Strategy.

All key stakeholders were further consulted on the draft pests and programmes for the Plan. Further meetings and workshops were undertaken with key stakeholders who had an interest in discussing the development of the Plan further with ORC.

For a full outline of all consultation please refer to the full consultation summary titled *Summary of consultation on the development of the Proposed Pest Management Plan and Biosecurity Strategy (2018)*.

### **3. RESPONSIBILITIES AND OBLIGATIONS**

#### **3.1 THE MANAGEMENT AGENCY**

It is proposed that Otago Regional Council will be is the management agency responsible for implementing the Proposal and the resultant Plan because:

- ~~(a) Otago Regional Council ORC is accountable to the Plan funders, including Crown agencies, through the requirements of the LGA 2002;~~
- ~~(b) it is acceptable to the funders and those persons subject to the Plan's provisions because it has implemented previous regional pest management strategies; and~~
- ~~(c) it has the capacity, competency and expertise to implement the Plan.~~

In addition to implementation methods detailed in the Plan Proposal, Otago Regional Council ORC maintains an internal set of operating procedures and ~~these shall be updated~~ to guide the delivery ~~on~~ of the Plan.

Pest management in Otago is a shared responsibility and, while Otago Regional Council ORC will be the management agency, pest management will be undertaken by many different stakeholders, agencies, community groups and individuals. This approach will result in effective and enduring pest management outcomes for the region.

#### **3.2 COMPENSATION AND DISPOSAL OF RECEIPTS**

The Plan ~~will~~ does not provide for compensation to be paid to any persons meeting their obligations under its implementation. However, should the disposal of a pest or associated organism provide any net proceeds, a person will be paid disbursement in the manner noted under section 100I of the Act.

### 3.3 AFFECTED PARTIES

#### 3.3.1 Responsibilities of occupiers (including owners)

Pest management is an individual's responsibility in the first instance because generally occupiers contribute to the pest problem and in turn benefit from the control of pests. The term "occupier" has a wide definition under the Act and includes:

- the person who physically occupies the place; and
- the owner of the place; and
- any agent, employee, or other person acting or apparently acting in the general management or control of the place.

Under the Act, "place" includes: any building, conveyance, craft, land or structure and the bed and waters of the sea and any canal, lake, pond, river or stream.

Occupiers must manage pests in accordance with the rules. If they fail to meet the rules' requirements, they may face legal action. For example, some rules specify that a contravention of the rule creates an offence under section 154N(19) of the Act. Occupiers (and other persons) must not sell, propagate, breed or distribute pests.

An authorised person may enter and inspect any place, at any reasonable time, to:

- find out whether pests are on the property;
- manage pests; or
- ensure the owner and/or occupier is complying with biosecurity law.

While the occupier may choose the methods they will use to control any pests, they must also comply with the requirements under other legislation (for example the RMA and/or the Hazardous Substances and New Organisms Act 1996).

This ~~Plan Proposal~~ treats all private land equitably and emphasises the responsibilities and obligations of all occupiers. ~~Otago Regional Council~~ ORC acknowledges the complexity around Māori land which is multiply owned. Where occupiers are unknown, the Māori Land Court or the Registrar of Companies may help to identify and assist in communication with owners.

#### 3.3.2 Crown agencies

Under section 69(5) of the Act, the Crown is liable to meet the obligations or costs that are required to meet GNRs contained within regional pest management plans. A GNR addresses situations where a pest may spread across a property boundary, where that spread impacts a neighbouring property where that pest is being controlled.

#### 3.3.3 Territorial authorities

Five territorial authorities are wholly or partly contained within the Otago region. They are:

- Dunedin City Council
- Clutha District Council
- Central Otago District Council

- Queenstown Lakes District Council
- Waitaki District Council - straddles both the Otago and Canterbury regions.

Territorial authorities are required to control pests on land that they occupy, in accordance with the rules of the Plan Proposal, and to meet the costs of doing so.

### 3.3.4 Road reserves and rail corridors

For the purposes of this Plan, the control of pests on roads is the responsibility of occupiers of roads.

For formed roads, the person responsible for the general management or control of the main carriageway is the occupier. Where the road reserve of a formed road is occupied by a neighbouring private landholder, the person responsible is the person physically occupying that area of the road reserve. For unformed roads, the person responsible is the person physically occupying the unformed road or, if it is unoccupied, the owner or person acting in the general management or control of that place.

The New Zealand Transport Agency (NZTA) is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to provisions applicable to a land occupier for the purposes of obligations for pest control, on road reserves or verges in terms of the Act (as described in Part Two of this Plan).

For the purposes of the Act, KiwiRail is also treated separately to the Crown, and comes within the definition of an occupier of land under the Act. Accordingly, it has obligations and responsibilities for pest management on the land that it occupies, equal to those of other occupiers.

~~KiwiRail and Otago Regional Council~~ ORC will work with NZTA and Kiwirail by agreement to manage mutual obligations and expectations. This may include the development of agreements which provide a comprehensive approach to the management of pests in the rail corridor and road corridors in accordance with the Objectives and Rules of the Plan and any exemption/s in accordance with section 78 of the Biosecurity Act 1993.



# PART TWO: PEST MANAGEMENT



*Tradescantia*

## PART TWO: PEST MANAGEMENT

### 4. ORGANISM DECLARATIONS

#### 4.1 ORGANISMS DECLARED AS PESTS

The organisms listed in Table 2 are classified as pests. The table also indicates what management programme or programmes will apply to the pest and if a Good Neighbour Rule (GNR) applies.

Attention is also drawn to the **statutory obligations** of any person under section 52 and section 53 of the Act. Those sections ban anyone from selling, propagating or distributing any pest, or part of a pest, covered by the Plan. Not complying with section 52 and section 53 is an offence under the Act and may result in the penalties noted in section 157(1).

Table 2: Organisms classified as pests

Common Name	Scientific Name	Primary Programme	Good Neighbour Rule
<b>Plants</b>			
African feather grass*	<del><i>Pennisetum macrourum</i></del> <i>Cenchrus macrourus</i>	Exclusion	
African love grass*	<i>Eragrostis curvula</i>	Progressive containment	
Banana passionfruit	<i>Passiflora tripartita</i> var <i>mollissima</i> <i>P. tripartita</i> var <i>azuayansis</i> <i>P. tarminiana</i> * <i>P. pinnatistipula</i> <i>Passiflora x rosea</i> <i>P. caerulea</i>	Site-led	
Bomarea*	<i>Bomarea caldasii</i> B. <i>multiflora</i>	Progressive containment	
Boneseed*	<i>Chrysanthemoides monilifera</i>	Progressive containment	
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>	Sustained control	Yes
Bur daisy	<i>Calotis lappulacea</i>	Progressive containment	
Cape ivy	<i>Senecio angulatus</i>	Progressive containment	
Chilean flame creeper	<i>Tropaeolum speciosum</i>	Site-led	
Chilean needle grass*	<i>Nassella neesiana</i>	Exclusion	

Contorta (lodgepole) pine* <sup>5</sup>	<i>Pinus contorta</i>	Progressive Containment	Yes
Corsican pine <sup>5</sup>	<i>Pinus nigra</i>	Progressive Containment	Yes
Darwin's barberry*	<i>Berberis darwinii</i>	Site-led	
<u>Egeria</u>	<u><i>Egeria densa</i></u>	<u>Exclusion</u>	
False tamarisk	<i>Myricaria germanica</i>	Exclusion	
Gorse	<i>Ulex europeus</i>	Sustained control	Yes
Gunnera	<i>Gunnera tinctoria</i>	Site-led	
<u>Hornwort</u>	<u><i>Ceratophyllum demersum</i></u>	<u>Exclusion</u>	
Lagarosiphon*	<i>Lagarosiphon major</i>	Site-led	
Larch (excl. sterile hybrids) <sup>5</sup>	<i>Larix decidua</i>	Progressive Containment	Yes
Moth plant*	<i>Araujia hortorum</i>	Exclusion	
Mountain pine and dwarf mountain pine <sup>5</sup>	<i>Pinus uncinata</i> <i>Pinus mugo</i>	Progressive Containment	Yes
Nassella tussock*	<i>Nassella trichotoma</i>	Progressive containment	
Nodding thistle	<i>Carduus nutans</i>	Sustained control	Yes
Old man's beard*	<i>Clematis vitalba</i>	Progressive containment	<u>Yes</u>
Perennial nettle	<i>Urtica dioica</i>	Progressive containment	
Ragwort	<i>Senecio jacobaea</i>	Sustained control	Yes
Scots pine <sup>5</sup>	<i>Pinus sylvestris</i>	Progressive Containment	Yes
Spartina	<i>Spartina spp</i>	Progressive containment	
Spiny broom	<i>Calicotome spinosa</i>	Eradication	
Sycamore	<i>Acer pseudoplatanus</i>	Site-led	
Tradescantia*	<i>Tradescantia fluminensis</i>	Site-led	
White-edged nightshade*	<i>Solanum marginatum</i>	Progressive containment	

Wilding conifers <sup>3</sup>	See Table 3	Progressive containment	Yes
Wild Russell lupin <sup>4</sup>	<i>Lupinus polyphyllus</i>	Sustained control	<u>Yes</u>
<b>Animals</b>			
Bennett's wallaby <sup>1,2</sup>	<i>Macropus rufogriseus rufogriseus</i>	Eradication	
Feral cat	<i>Felis catus</i>	Site-led	
Feral deer	<i>Cervus elaphus, C. nippon, C. dama</i>	Site-led	
Feral goat	<i>Capra aegagrus hircus</i>	Site-led	
Feral pig	<i>Sus scrofa</i>	Site-led	
Feral rabbit	<i>Oryctolagus cuniculus</i>	Sustained control	Yes
Hedgehog	<i>Erinaceous europaeus</i>	Site-led	
Mustelids (ferret, stoat, weasel)	<i>Mustelo furo, M. ermine, M. nivalis</i>	Site-led	
Possum	<i>Trichosurus vulpecula</i>	Site-led	
Rat (Norway, ship and Kiore)	<i>Rattus norvegicus, R. rattus, R. exulans</i>	Site-led	
Rook*	<i>Corvus frugilegus</i>	Eradication	

\* Classified as Unwanted Organisms

1. Also included in Site-led programmes.

2. Unwanted Organism status expires 20/09/2021.

3. Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1ha or more of predominantly planted trees. This also excludes planted conifers of less than 1ha, such as windbreaks and shelterbelts existing before March 2019.

4. Wild Russell lupin are Russell lupins that are established by natural means.

5. Does not include specimens used or intended to be used for plantation forestry purposes in a plantation forest. ~~as defined by regulation 3(1) of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.~~

Table 3: Introduced conifer trees

Common name	Scientific name
Bishops pine	<i>Pinus muricata</i>
Contorta (lodgepole) pine*	<i>Pinus contorta</i>
Corsican pine	<i>Pinus nigra</i>

Douglas fir	<i>Pseudotsuga menziesii</i>
Larch	<i>Larix decidua</i>
Maritime pine	<i>Pinus pinaster</i>
Mountain pine and dwarf mountain pine	<i>Pinus mugo and P.uncinata</i>
Ponderosa pine	<i>Pinus ponderosa</i>
Radiata pine	<i>Pinus radiata</i>
Scots pine	<i>Pinus sylvestris</i>

## 4.2 PEST AGENTS

There are some organisms specified as pest agents in the ~~Plan Proposal~~. These are distinct from other organisms which are classified as pests. Pest agents are defined in the Biosecurity Act:

*Pest agent, in relation to any pest, means any organism capable of-*

- (a) *helping the pest replicate, spread, or survive; or*
- (b) *interfering with the management of the pest.*

Pest agent rules are included in the ~~Plan Proposal for Russell lupin *Lupinus polypyllus* to ensure the success of the related pest objectives.~~ ~~for wild Russell lupin *Lupinus polypyllus*.~~

### **Pest agents:**

Russell lupin

*Lupinus polypyllus*

Pest agent conifer

Means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.

## 4.3 OTHER ORGANISMS THAT MAY BE CONTROLLED

The organisms specified as pests in the Plan are those that are capable of causing ‘*adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga*’.

Section 70(2)(d) of the Act also provides for the specification of ‘*any other organisms intended to be controlled*’ but not accorded pest status. There are many further organisms capable of causing adverse effects, particularly to biodiversity values. A number pose a sufficient future risk to warrant being watch-listed for ongoing surveillance or future control opportunities. These organisms have been categorised as ‘Organisms of Interest’ (OOI). OOIs are not accorded pest status but future control of them could arise, for example through site-led programmes. A review of the Plan may be necessary to include them as

pests. However, OOs may be controlled in other ways in accordance with the ~~Proposed~~ Biosecurity Strategy. A list of all OOs is provided in Appendix 1.

#### 4.4 UNWANTED ORGANISMS

A number of species have been declared nationally as Unwanted Organisms. For the most up-to-date list of Unwanted Organisms, visit the MPI website at <https://www.mpi.govt.nz>.

The National Pest Plant Accord (NPPA) currently targets 113 plant species, all of which are declared Unwanted Organisms. NPPA is a cooperative agreement between the Nursery and Garden Industry Association, regional councils and Government departments with biosecurity responsibilities. It seeks to prevent the sale and/or distribution of the specified plants where either formal or casual horticultural trade is the most significant way of spreading the plants in New Zealand. The most up-to-date list of Accord species is also available on the MPI website.

Unwanted Organism status means that such an organism is prohibited from sale, propagation and distribution in accordance with sections 52 and 53 of the Act. Where this restriction is considered sufficient for their management they are not included as pests in this Plan. However, unwanted organisms may be controlled in other ways in accordance with the ~~Proposed~~ Biosecurity Strategy.

## 5. PEST MANAGEMENT FRAMEWORK

### 5.1 OBJECTIVES

Objectives have been set for each pest or class of pests. As required by the NPD, the objectives include:

- the particular adverse effect/s (section 54(a) of the Act) to be addressed;
- the intermediate outcomes of managing the pest;
- the geographic area to which the objective applies;
- the level of outcome, if applicable;
- the period for achieving the outcome; and
- the intended outcome in the first 10 years of the Plan (if the period is greater than 10 years).

### 5.2 PEST MANAGEMENT PROGRAMMES

One or more pest management programme(s) will be used to control pests and any other organisms covered by this Plan. The types of programme are defined by the NPD and reflect outcomes in keeping with the extent of the invasion within the region and whether it is possible to achieve the desired control levels.

The intermediate outcomes for the five programmes are described below.

1. **Exclusion Programme:** to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet established in an area.
2. **Eradication Programme:** to reduce the infestation level of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term.
3. **Progressive Containment Programme:** to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time.
4. **Sustained Control Programme:** to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties.
5. **Site-led Pest Programme:** that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place.

### 5.3 PRINCIPAL MEASURES TO MANAGE PESTS

The principal measures used in the Plan to achieve the objectives are in ~~four~~five main categories. Each category contains a suite of tools to be applied in appropriate circumstances.

## 1. Requirement to Act

Land owners and/or occupiers or other persons ~~may~~ shall be required to act where Plan rules dictate:

- (a) pests are to be controlled;
- (b) management plans are to be prepared and submitted;
- (c) the presence of pests is to be reported;
- (d) actions are to be reported (type, quantity, frequency, location, programme completion); or
- (e) pests are not to be spread (propagated, sold, distributed), and pathways are to be managed (eg, machinery, gravel, animals).

## 2. Council Inspection

Inspection by Council may include staff:

- (a) visiting properties or doing surveys to determine whether pests are present, or rules and management programmes are complied with, or to identify areas that control programmes will apply to (places of value, exclusion zones, movement control areas);
- (b) managing compliance to regulations (rule enforcement, action on default, prosecution, exemptions);
- (c) taking limited control actions, where doing so is effective and cost efficient; or
- (d) monitoring effectiveness of control.

## 3. Service Delivery

Council may deliver the service:

- (a) where it is funded to do so within a rating district;
- (b) on a user pays basis;
- (c) by providing control tools, including sourcing and distributing biological agents, or provisions (eg, traps, chemicals).

## 4. Advocacy and Education

Council may:

- (a) provide general purpose education, advice, awareness and publicity activities to land owners and/or occupiers and the public about pests and pathways (and control of them);
- (b) encourage land owners and/or occupiers to control pests;
- (c) facilitate or fund community and land owners and/or occupier self-help groups and committees;
- (d) help other agencies with control, advocacy, and the sharing or sourcing of funding;



- (e) promote industry requirements and best practice to contractors and land owners and/or occupiers;
- (f) encourage land owners and/or occupiers and other persons to report any pests they find or to control them; or
- (g) facilitate or commission research.

## 5. Collaboration

~~Otago Regional Council~~ ORC will collaborate with other agencies and land occupier groups, which may include the development of agreements, for the effective management of pests to protect the values of specific sites, corridors and areas.

### 5.4 RULES

Rules play an integral role in securing many of the pest management outcomes sought by the ~~proposed~~ Plan. They create a safety net to protect land owners and/or occupiers from the effects of the actions or inactions of others where non-regulatory means are inappropriate or do not succeed. Importantly, amendments to the Act arising from the [Biosecurity Law Reform Act 2012](#) now make the Crown bound by those rules identified as **Good Neighbour Rules** (GNR) in regional pest management plans.

Section 73(5) of the Act prescribes the matters that may be addressed by rules, and the need to:

- specify if the rule is to be designated as a ‘Good Neighbour Rule’;
- specify if breaching the rule is an offence under the Act;
- specify if an exemption to the rule, or any part of it, is allowable or not; and
- explain the purpose of the rule.

Rules can apply to owners and/or occupiers or to a person’s actions in general.

The NPD and accompanying guidance notes provide extra requirements to include in the rules of a new GNR. Of particular note, the GNR will:

- (a) identify who the GNR applies to - either all owners and/or occupiers, or a specified class of owner and/or occupier;
- (b) identify the pest to be managed;
- (c) state that the pest must already be present on the owner’s and/or occupier’s land;
- (d) state that the owner and/or occupier of the adjacent or nearby land must, in the view of the management agency, be taking reasonable measures to manage the pest on their land; and
- (e) (if relevant) state the particular values or uses of the neighbouring land that the pest’s spread affects, and that the GNR is intended to address.

## 5.5 COMMUNITY ENGAGEMENT

ORC works with the community to deliver pest management outcomes. This may include acknowledging, working with and supporting the work done by community organisations; and seeking community advice on plan implementation to inform the operational local inspection requirements, information and service delivery needs and identification of new pest issues. Community engagement on site-led initiatives is also another way for the pest objectives to be achieved.

## 6. PEST DESCRIPTIONS AND PROGRAMMES

Section 6 lists the pests to be managed under the Plan under the programme(s) to which they are assigned together with the Plan's objectives and the principal measures to be taken to achieve the objectives. ~~The Plan proposal is required to describe, for each pest listed:~~

- ~~• its adverse effects;~~
- ~~• the reasons for a Plan;~~
- ~~• the objectives to be included in the Plan (see Section 5.1 above);~~
- ~~• the principal measures (including rules) to be used to achieve the objectives (see Section 5.3 above); and~~
- ~~• any other measures that would be reasonable to take to achieve the objectives.~~

## 6.1 PESTS TO BE MANAGED UNDER EXCLUSION PROGRAMMES

### 6.1.1 Introduction

The pests listed in Table 4 below are not known to be present in the Otago region and preventing their establishment is of benefit to the Otago community.


Table 4: Pests to be included in exclusion programmes

Common name	Scientific name
African feather grass	<i>Pennisetum macrourum</i> <i>Cenchrus macrourus</i>
Chilean needle grass	<i>Nassella neesiana</i>
<u>Egeria</u>	<i>Egeria Densa</i>
False tamarisk	<i>Myricaria germanica</i>
<u>Hornwort</u>	<i>Ceratophyllum demersum</i>
Moth plant	<i>Araujia hortorum</i>

### 6.1.2 Description and adverse effects of pests to be managed under exclusion programmes

The characteristics of each pest to be managed through the exclusion programmes, and threats that they pose, are set out in Table 5 below.

Table 5: Characteristics and threats of pests in exclusion programmes

Description of the pests and adverse effects	
<p><b>African feather grass</b> is a tussock-like grass forming dense clumps up to 2m high. The leaves are whitish green on top, distinctively ribbed, and dark green in colour underneath. The leaf edges feel rough when touched. The leaf sheath is covered in hairs. African feather grass produces fibrous roots and rhizomes that will form new shoots. It flowers from December to April. The flowers form a long narrow spike, straw yellow in colour, and sometimes have a purplish tinge. The seeds have bristles which allow them to become easily attached to clothing, animal hair or wool.</p> <p>The extensive root system makes it difficult to remove. It produces large amounts of seeds which are easily dispersed by wind and can be carried on clothing. The plant can spread quickly, crowding out other low growing plant species. It can also adversely impact production and economic values.</p> <p><del>For these reasons, it is included in the Plan Proposal.</del></p>	 <p>Source: Weedbusters</p>

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**Chilean needle grass** is a tufted perennial plant growing up to 1m. Its leaves are bright green and harsh to the touch. Identification within grazed pasture is difficult. The flowers appear in October, and have a purple tinge and ripen into hard, sharp seeds with long twisting tails. These aid the seed in the penetration of the animal's skin and the soil. It also produces viable seeds in its mid and basal stem regions (cleistogenes).

Plants will grow into dense stands and exclude other indigenous and exotic grassland species. It reduces the livestock carrying capacity of pastures due to the production of masses of unpalatable flower stalks. The sharp penetrating seeds injure livestock and result in the downgrading of wool, skins and hides. The seed can move through an animal's skin into body muscles, causing abscesses and the downgrading of carcasses. Lambs are particularly vulnerable to seeds penetrating their eyes causing blindness.

The point of the seed is extremely sharp and hairy so catches onto passing animals, vehicles, and humans. As a result, it can be transported considerable distances to new sites.

Chilean needle grass can cause adverse effects to pastoral production and economic well-being. ~~Due to this it is included in the Plan~~ Proposal.



Source: Environment Canterbury

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Egeria is a slender, brittle aquatic plant with buoyant stems (3 millimetre diameter). Its linear, dark green leaves (15-30 by 4 millimetres) are in whorls of 4-6. From November to January it produces white flowers (20 millimetre diameter) that are 3-petalled with yellow stamens, that sit on the surface of the water. As only male plants are found in New Zealand, no seed is set, however new plants form from stem fragments which break off. It grows in most still or slow-moving, highly lit submerged sites, and tolerates a wide range of temperatures.

Large clumps can dislodge from the underwater meadows, causing flooding. Rotting vegetation stagnates water, killing fauna and flora. Egeria has adverse effects on environmental and recreational values. It is included in the Plan because of its impacts on other species by crowding them out, affects recreational values and has the potential to cause flooding.



Source: Auckland Council

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**False tamarisk** is a deciduous shrub (to 1.5m) with upright branches and small, narrowly triangular leaves (up to 5.5mm x 1.6mm) held close to its branches that appear bluish-green due to salt secretions on the underside. Small, pink, 5-petalled (3.2mm) flowers are in hanging clusters from January and are followed in February and March by small grey capsules containing seeds (0.7-0.9mm). The seeds are spread by wind and water.



Source: A Rebergen

False tamarisk alters the natural environment of stony river beds by reducing the habitat available for birds that nest in braided riverbeds, while also providing cover for the predators that attack them. ~~It is included in the Plan Proposal for these reasons.~~

**Hornwort** is a submerged, free-floating or lightly anchored perennial that grows in water up to 16 metres deep. Its stems (30-150 centimetres long) are floating or submerged, branched, stiff and brittle. Thin dark green leaves (1-4 centimetres long) in whorls of 7-12 are densely crowded at the stem tip, increasingly spaced down the stem, and equally forked once or twice into stiff tapering segments with teeth on the outer edge. It produces minute green or white flowers, but is not known to fruit in New Zealand. New plants can form from each piece of the easily broken stems. It rapidly invades water of varying clarity, temperature, light and nutrient level. Its dense growth habit crowds out native species, can block waterways, and rotting vegetation stagnates water, killing fauna and flora. This plant threatens most submerged plant communities, adversely affecting the environment and recreational values.



Source: Auckland Council

**Moth plant** is a perennial, broad-leaved, herbaceous climber and can grow to over 5m tall. It has almost-oblong leaves measuring 3-11cm, flowers profusely but fruit set is low. The choko-like fruits, as big as a fist, contain about 400 parachute-like seeds, and mature fruits normally remain for long periods on the vines.



Moth plant can adversely impact environmental and human health values. It climbs over shrubs and small trees, smothering and breaking them down. It also spreads over the ground, smothering native plants of small stature and regenerating seedlings. Both fruits and stems exude a caustic milky sap when crushed or broken. This white latex is sticky, causes skin irritation in susceptible people and is poisonous to humans.

~~It is included in the Plan Proposal because of these impacts.~~

### 6.1.3 Eradication Exclusion programmes

The management aims, and the range of methods to be used to accomplish those aims or the pests to be excluded, are set out in Table 6 below. ~~An explanation of alternative means is also provided.~~

Table 6: Aims and means of achievement for exclusion programmes

Objective, Principal Measures and Rules	
<b>Plan Objective 6.1.3</b> Over the duration of the Plan, preclude establishment of African feather grass, Chilean	<b>Principal measures to be used</b> Otago Regional Council <b>inspection, service delivery, advocacy and education and</b>

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needle grass, egeria, false tamarisk, hornwort and moth plant within the Otago region to prevent adverse effects on economic well-being and environmental values<sup>1</sup>.

**collaboration** described in section 5.3 of the ~~Plan Proposal~~ will be used to achieve Plan Objective ~~4-6.1.3~~.

Otago Regional Council will be responsible for any incursion control of African feather grass, Chilean needle grass, false tamarisk and moth plant should it arise. Otago Regional Council anticipates that any incursion response to egeria and hornwort would be undertaken collaboratively with other parties which could include the Ministry for Primary Industries, Department of Conservation, Land Information New Zealand, and land occupiers. Persons will be encouraged to notify Otago Regional Council of the presence, or possible presence, and location within the Otago region of any of these pests.

**~~Alternatives considered~~**

~~Excluding establishment of pests is a specialised activity involving surveillance systems and the capacity to act quickly to destroy any incursions. The Otago Regional Council has better access to the necessary skills and resources for this than do individual persons. Therefore, relying on or requiring individual action as a means of achieving Plan Objective ~~4-6.1.3~~ is not considered a viable alternative.~~

~~There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.~~

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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<sup>1</sup> For a definition refer to Glossary.

## 6.2 PESTS TO BE MANAGED UNDER ERADICATION PROGRAMMES

### 6.2.1 Introduction

There are three pests in the Otago region where the infestation levels are low enough to make eradication possible within the proposed 10-year duration of the Plan. These pests are listed in Table 7 below.

Eradicating Bennett's wallaby will be supported by a collaborative approach involving Otago Regional Council ORC, Environment Canterbury, the Sustainable Farming Fund (led by Landcare Research) and the Ministry of Primary Industries.

In the case of rooks, while preventing rooks from breeding within the duration of the Plan is relatively straightforward, it may take longer to eliminate all remaining birds.

Table 7: Pests to be included in eradication programmes

Common name	Scientific name
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus</i> ,
Rook	<i>Corvus frugilegus</i>
Spiny Broom	<i>Calicotome spinosa</i>

### 6.2.2 Description and adverse effects of pests to be managed under eradication programmes

The characteristics of each pest to be managed through the eradication programmes, and the adverse impacts they cause, are set out in Table 8 below.

Table 8: Characteristics and threats of pests in eradication programmes

Description of the pests and adverse effects	
<p><b>Bennett's wallaby</b>, often called red-necked wallaby, is a marsupial that stands up to 80cm with a tail length around 62cm. Males can reach over 20kg in weight with females reaching 14kg. They have a greyish-brown upper body, pale grey chest and belly and reddish-brown (rufous) colour on the shoulders. Their hind feet and tail are black tipped. Solitary in nature, they commence breeding at about 24 months.</p> <p>Outside of the Otago region, Bennett's wallabies occupy approximately 450,000 hectares of land in South Canterbury, centred in the Hunter Hills, but including the Two Thumb Range, the Kirkleston and the Grampian mountains. Populations also occur in Kakahu Forest near Geraldine and Pioneer Park south-east of Fairlie. However, despite the efforts in Canterbury to contain this species within that region, ingress into North Otago has occurred.</p> <p>Wallabies are capable of causing significant adverse environmental effects. These include preventing the regeneration of native bush, depletion of forest understorey and possible impacts on water quality. They</p>	



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also damage tall tussock grasslands, including the inter-tussock vegetation which can become depleted with a consequent increase in bare ground and higher risk of soil erosion.

Adverse economic effects include damage to pasture with anecdotal evidence of complete clearance of cover in places. There is evidence of wallabies grazing on green feed crops, particularly where these border suitable cover. Wallabies also damage exotic forests, particularly at the establishment stage, with damage being more serious in areas bordering native bush or scrub areas.

~~They are included in the Plan Proposal for the reasons outlined above.~~



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**Rooks** are large, glossy, purplish-black birds. They have a prominent, powerful beak with whitish patches of skin around the base. Highly gregarious, their presence is announced with a distinctive 'kaah', and as they fly they 'caw' to keep in contact with each other. Rooks forage, often up to 20km daily, from either rookeries or communal winter roosts. During breeding (August-January), all birds live in rookeries, often the same sites as used in the previous breeding seasons.



Rooks show a strong preference for foraging in fields of cereals at all stages of the crop, in recently cultivated land, and in stands of walnut trees. The effect of large flocks of rooks is to severely damage or destroy newly emerging crops and pasture.

There are thought to be less than 40 birds remaining in Otago.

Successful control has been achieved through a coordinated approach at times of favourable weather conditions and limited food sources. Unsuccessful control can lead to rooks becoming wary and much more difficult to control. Rookeries can fragment, and new rookeries establish.

~~For the above reasons, they are included in the Plan Proposal.~~

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**Spiny broom** is a much-branched spiny shrub <3m tall. Ridged stems with sharp spines. Dark or grey-green leaves, 3 leaflets hairy underneath and may occur in clusters. Bright yellow flowers followed by flattened seedpods.

An invasive plant that is capable of rapidly colonizing and displacing pasture species or disrupting indigenous ecosystems. Spiny broom is included in the Plan Proposal to prevent impacts on conservation values.



### 6.2.3 Eradication programmes

The management aims and the range of methods to be used to accomplish those aims for the pests to be excluded are set out in Table 9 below. ~~An explanation of alternative means is also provided.~~

Table 9: Aims and means of achievement for eradication programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.2.3</b></p> <p>Over the duration of the Plan, reduce all infestations of Bennett’s wallaby, rooks and spiny broom to zero levels within the Otago region to prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>The <b>requirement to act, council inspection, service delivery, advocacy and education and collaboration</b> described in section 5.3 of the <del>Plan</del><del>Proposal</del> will be used to achieve Plan Objective 6.2.3.</p> <p>Otago Regional Council will take responsibility for undertaking the eradication programmes for rooks and spiny broom.</p> <p>For Bennett’s wallaby, control will be a shared responsibility between Otago Regional Council and land occupiers. This will allow flexibility in designing the most effective and efficient control mechanisms to be used.</p> <p>While persons are required to report the presence, or possible presence, and location within the Otago region of Bennett’s wallaby to the Otago Regional Council, persons will also be encouraged to notify Otago Regional Council of the presence of rooks or spiny broom.</p> <p><del><b>Alternatives considered</b></del></p> <p><del>Relying solely on occupiers to undertake voluntary action or requiring them to act to prevent adverse effects for Bennett’s wallaby, rooks and spiny broom, is not considered viable. This is because spiny broom is difficult to identify and the low levels of infestations may result in many plants not being removed in a timely manner. The uneven spread of invasions places an inequitable burden on those occupiers whose properties are infested.</del></p> <p><del>Similarly, an inequitable burden exists for in relation to Bennett’s wallaby and rooks because of their dispersibility, the need for coordinated control techniques and the uneven distribution of habitat.</del></p> <p><del>It is therefore preferable for beneficiaries rather than exacerbators to bear the responsibility for eradication.</del></p>
<p><b>Plan Rule 6.2.3.1</b></p> <p>Other than under the instruction or supervision of an authorised person, no person shall:</p> <p>(a) poison, capture or trap any rook; or</p>	<p><b>Explanation of rule</b></p> <p>The purpose of this rule is to prevent humans hindering the control of rooks. The birds are wary and require a settled environment for successful control. They are also easily dispersed.</p>

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- (b) discharge any firearm at any rook; or
  - (c) discharge any firearm at or within 500m of any tree containing a rookery; or
  - (d) damage, disturb or interfere in any way with a rookery.

A breach of this rule or any part thereof creates an offence under section 154N(19) of the Act.

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**Plan Rule 6.2.3.2**

All occupiers within the Otago region shall destroy all Bennett's wallaby on the land they occupy.

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

**Explanation of rule**

The reason for this rule is to prevent wallabies from becoming established in the region and causing adverse effects on economic and environmental values.

Occupiers are required to control Bennett's wallaby on their land where this can be undertaken quickly and effectively. However, due to their range and low population numbers in Otago, if an occupier observes a Bennett's wallaby on their land, but is not able to destroy it, then they are required to report the sighting immediately to Otago Regional Council in accordance with Rule 6.2.3.3 below. Otago Regional Council will then either be able to support the property occupier to destroy the wallaby or undertake the control works itself.

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**Plan Rule 6.2.3.3**

Any person who detects or suspects the presence of Bennett's wallaby, whether dead or alive, within the Otago region, must immediately report the pest's presence and location to the Otago Regional Council.

This is required even if the Bennett's wallaby is destroyed in accordance with the above Rule 6.2.3.2.

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

**Explanation of rule**

The reason for this rule is to assist Otago Regional Council in detecting the presence of any wallabies in order to help the Council to effectively achieve the eradication programme outcomes.

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**Plan Rule 6.2.3.4**

No person, other than an authorised person, shall keep, hold, enclose or otherwise harbour any Bennett's wallaby.

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

**Explanation of rule**

The reason for this rule is to prevent humans actively attempting to establish a wallaby population within the Otago region.

Exemptions to the rule will cater for case-by-case applications to keep wallabies for public benefit, eg. research, zoos, or any other use.

It is in the long-term interests of the region's inhabitants that biodiversity and economic well-being values are protected from the adverse effects brought about by the presence of wallabies.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

## 6.3 PESTS TO BE MANAGED UNDER PROGRESSIVE CONTAINMENT PROGRAMMES

### 6.3.1 Introduction

There are a number of pests that are well established in the Otago region, but it is still feasible to reduce their present infestation levels through progressive containment programmes. In some cases, the programmes will result in fewer sites infested, or in others, the overall density of the pest will reduce over the ~~proposed~~ 10 year duration period. These pests are listed in Table 10 below.

Table 10: Pests to be included in progressive containment programmes





Common name	Scientific name
<b>Plants</b>	
African love grass	<i>Eragrostis curvula</i>
Bomarea	<i>Bomarea caldasii</i> <i>B. multiflora</i>
Boneseed	<i>Chrysanthemoides monilifera</i>
Bur daisy	<i>Calotis lappulacea</i>
Cape ivy	<i>Senecio angulatus</i>
Nassella tussock	<i>Nassella trichotoma</i>
Old man's beard	<i>Clematis vitalba</i>
Perennial nettle	<i>Urtica dioica</i>
Spartina	<i>Spartina spp</i>
White-edged nightshade	<i>Solanum marginatum</i>
Wilding conifers <sup>1</sup> , contorta, Corsican, Scots, mountain and dwarf mountain pines and larch	<i>Wilding conifers, Pinus contorta, P. nigra, P. sylvestris, P. uncinata, P. mugo and Larix decidua.</i>

<sup>1</sup> Refer to the definition of Wilding conifer in the Glossary.

### 6.3.2 Pests to be managed under progressive containment programmes by occupiers

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 11 below.

Table 11: Characteristics and threats of pests in progressive containment programmes

Description of the pests and adverse effects	
Plants	
<p><b>Bomarea</b> is a shade tolerant, multi-stemmed vine that arises from short underground rhizomes, which bear numerous tubers. The flowers are clumped in a dense, pendulous bunch of 15 to 20. The flowers are reddish on the outside and yellow with red spots on the inside and develop into capsules about 2cm in diameter. When ripe, they split open to reveal bright fleshy orange seeds, which can be dispersed over long distances by birds.</p> <p>Known to be present, or has been present, across 650 properties in Dunedin City, Otago Peninsula, and West Harbour areas.</p> <p>An ornamental garden escapee, it invades alongside streams and river banks, shrublands, forest edges, forest remnants and intact low canopy forest. The vines grow into the forest canopy, forming large masses, which overtop and smother supporting trees. Large infestations can alter light levels in forests, kill mature trees and prevent seedlings from establishing.</p> <p><del>For these reasons, it is included in the Plan Proposal.</del></p>	 
<p><b>Boneseed</b> is an evergreen shrub reaching up to 3m tall. The leaves are dull green, toothed and covered with a cottony down. Daisy-like flowers are produced in bright yellow clusters from late winter until late summer. Up to 50,000 seeds per plant can be produced in one year and can remain viable for up to 10 years. Seed dispersal occurs locally by birds and by water.</p> <p>Boneseed is established in several sites in and around Dunedin including Portsmouth Drive, Forbury, Port Chalmers, and Aramoana and at Taieri Mouth and Moeraki.</p> <p>A tolerance of dry, infertile soils allows boneseed to colonise and establish easily in coastal areas. While thought to be restricted to frost-free areas, that may not be the case. Absence of grazing animals also aids its establishment.</p> <p>Boneseed's vigorous growth will displace desirable plants, shade out native seedlings and reduce or prevent public access to coastal and beach areas. It is highly flammable and will regenerate prolifically after fire. It can cause adverse effects to environmental and recreational values.</p> <p><del>For these reasons, it is included in the Plan Proposal.</del></p>	 

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**Bur daisy** is a small, perennial herb (up to 40cm tall and 1m in diameter) with many fine, green branches. Its green, thin (almost linear) leaves are fairly insignificant. The plant produces small, pom pom-like clusters of bright yellow flowers for most of the year, but are most prolific over the summer. Flowers develop into very hard, brown burs, covered in tiny hooks.



It is found on one 10 hectare block of land at an active site near Georgetown in the Waitaki Valley.

Bur daisy is a serious threat to pastoral farming, particularly causing wool contamination. Left uncontrolled, bur daisy replaces other plant species. It produces many seeds that are quickly spread by stock movement and remain viable for many years.

~~It is included in the Plan Proposal for the above reasons.~~

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**Cape ivy** is a scrambling perennial, often forming a dense tangled shrub 2-3m tall, with wiry to woody stems that are sparingly branched. Very fleshy, leathery leaves have 1-3 coarse serrations on each side, and the uppermost leaves are smaller, narrower and occasionally smooth edged. Dense clusters of yellow, ragwort-like flowers (11mm diameter) are produced from March to August, followed by fluffy seeds.



The plant produces many long-lived seeds that are dispersed a long way from parent plants. Moderate growth rate and layering stems, scrambles over shrubs and ground, forms dense, tall thickets. Tolerates salt, wind, drought, semi-shade and damage.



It is found mainly in the Dunedin City and Otago Peninsula areas at 65 active sites.

Wind spreads the seed, and seed and fragments are spread in dumped vegetation and soil movement. Cape ivy smothers ground and low-growing plants to 3m tall, forming dense, long-lived mats that prevent the establishment of native plant seedlings. Coastal, rocky areas, cliffs, bush edges, regenerating lowland forests and inshore islands are at risk from this plant.

~~For the above reasons, it is included in the Plan Proposal.~~

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**Nassella tussock** is a tufted, perennial, tussock grass with a swollen stem. Its fine, tightly rolled, light green or yellowish-green leaves feel needle-like and very tough when fingers are run along the leaf. The plants are erect when young but slightly drooping with age and grow up to 70cm high and 80cm wide. Flowering usually commences in October and is characterised by purplish tinge. Each mature plant can produce up to 100,000 seeds per year. Roots are deep, matted and fibrous. They have been found growing 1.7m below the soil surface.



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Its presence is confined to the Roxburgh, Alexandra, Cardrona and Waitaki Valley areas.

Nassella tussock adversely affects production values due to reduced pasture quality and it also affects environmental values by displacing native species in tussock grassland. It can be difficult to identify amongst other tussocks.

~~For these reasons, it is included in the Plan Proposal.~~



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**Old man's beard** is a deciduous, perennial, climbing, layering vine to 20m tall with very long, woody stems with six prominent ribs (appear as furrows in older vines) and pale, easily rubbed-off bark. Leaves are arranged in opposite pairs on the stems and are made up of five (sometimes three) widely spaced, thin, papery leaflets. Creamy white, fragrant flowers (2-3cm diameter) are produced from December to May, followed by grey, hairy seeds (2-3mm long) with distinctive white plumes (3-4cm long) in dense, fluffy clusters persisting over winter (hence the 'old man's beard'). Native clematis usually has 3 leaflets per stem, smooth stems, and is evergreen.

It is found in exotic forest, native forest remnants, shelterbelts and hedgerows, waste ground, on riverbanks and in gardens. The plant is found on 2600 urban properties across the region and is known to occupy several hundred hectares of rural land, riverbeds and margins across the region.

It is capable of smothering and killing all plants to the highest canopy and prevents the establishment of native plant seedlings. Its seeds are both wind and water borne.

~~For these reasons, it is included in the Plan Proposal.~~



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**Perennial nettle** can grow up to 1.5m high. Its stems are woody, its flowers are green and its leaf is a lighter colour green than common stinging nettle (*Urtica urens*). It grows taller than common stinging nettle and it has an extensive system of underground rhizomes, whereas common nettle does not have rhizomes. The seeds are 1-1.5mm long, flat, oval and yellow to greyish in colour. Its underground rhizomes can spread 2.5m in a season.

It is a particular problem in South Otago, mainly Balclutha, Lawrence and Clydevale (along the Clutha River).

The sting causes itching and burning which may last for several days. Animals shy away from the plant because of its stinging hairs. The pollen from this plant may cause hay fever.

Perennial nettle's extensive system of underground rhizomes, and its ability to form tall dense stands means it can easily invade paddocks and dominate good



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pasture. It tolerates a wide range of conditions, soil types and localities from shade and damp, to very dry. It can be found in pastures, in areas where stock shelter or congregate, waste areas, river banks, roadsides and old house sites.

~~It is included in the Plan Proposal for the above reasons.~~

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**Spartina** is a perennial estuarine sward grass, commonly 1m tall and growing in shallow saltwater. It has stiff, upright stems, originating from thick rhizomes. The stems have broad, pointed leaves from their base to the top, where several long fingers contain the seed. New growth occurs from either root pieces or seed. Shoots rapidly sprout from belowground rhizomes, while the seed falls into the water and floats away.



Scattered infestations occur in Pleasant River Estuary, Karitane Estuary, the Lower Taieri Gorge and Catlins Lake.

Colonies of spartina form dense grassy clumps, and these can spread laterally from underground rhizomes, or by over ground side shoots (tillers). Within the estuarine area, vast meadows can form causing a build-up of sediment. This can increase the risk of flooding and also alter the habitat for wading bird species and other estuarine flora and fauna.



~~For these reasons, it is included in the Plan Proposal.~~

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**White-edged nightshade** is a quick growing perennial shrub that can grow up to 5m tall. The large woody stems and green oak-shaped leaves are covered in nasty sharp spines. Its leaves have white veins on the upper surface and dense chalky-white hairs on the underside. In summer white or pale mauve flowers bloom in clusters at the end of branches. Green-yellow tomato-shaped berries grow on the ends of prickly stalks.



It is confined to one site near Hampden, but is also known to have existed on Quarantine and Goat Islands in the Otago harbour.

The shrub is well adapted to dry areas. Once established, it forms dense thickets that are impenetrable to stock. It also prevents the establishment of native understory on margins of native bush. White edged nightshade adversely affects economic well-being and environmental values. ~~and is included in the Plan Proposal for these reasons.~~

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The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained (private occupier responsibility) are set out in Table 12 below. An explanation of alternative means is also provided.

Table 12: Aim and means of achievement for pests in progressive containment programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.3.2</b></p> <p>Over the duration of the Plan progressively contain and reduce the geographic distribution or extent of bomarea, boneseed, bur daisy, cape ivy, nassella tussock, old man’s beard, perennial nettle, spartina and white-edged nightshade at known sites within the Otago region to minimise or prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, advocacy and education, and collaboration</b> described in section 5.3 of the <del>Plan Proposal</del> will be used by Otago Regional Council to achieve Objective 6.3.2.</p> <p>Generally, occupiers will carry out the necessary control work to remove these plant pests.</p> <p><b>Alternatives considered</b></p> <p><del>Otago Regional Council could take on the responsibility for these plant pests. However, their extent or infestation densities are such that the logistics of carrying out the control programmes would be difficult to integrate with individual property occupier management requirements. It is also unlikely to be cost effective. This alternative is therefore rejected. Relying on voluntary individual action to minimise adverse impacts of these plant pests would not be effective due to inadequate incentives to do so.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>
<p><b>Plan Rule 6.3.2.1</b></p> <p>All occupiers within the Otago region shall eliminate bomarea infestations on the land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant’s ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.</p>
<p><b>Plan Rule 6.3.2.2</b></p> <p>All occupiers within the Otago region shall, upon receipt of a written notice from an Authorised Person, eliminate boneseed infestations on the land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant’s ability to set viable seed.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.</p>

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

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**Plan Rule 6.3.2.3**

All occupiers within the Otago region shall eliminate bur daisy infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being are minimised.

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**Plan Rule 6.3.2.4**

All occupiers within the Otago region shall eliminate cape ivy infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.

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**Plan Rule 6.3.2.5**

All occupiers within the Otago region shall eliminate nassella tussock infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being and environment values are minimised.

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**Plan Rule 6.3.2.6**

All occupiers within the Otago region shall eliminate old man's beard infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.

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**Plan Rule 6.3.2.7**

**Note: This is designated a Good Neighbour Rule**

All occupiers within the Otago region shall, on receipt of a written direction from an Authorised Person, eliminate old man's beard infestations on their land within 20m of the property boundary where the occupier of the adjoining property is eliminating old man's beard infestations within 20m of that boundary with the intention of protecting environmental values.

**Explanation of rule**

The reason for this rule is to manage the spread of old man's beard having unreasonable costs to an adjacent occupier where active old man's beard management is being undertaken by that land occupier.

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

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For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Plan Rule 6.3.2.8**

All occupiers within the Otago region shall eliminate perennial nettle infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being are minimised.

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**Plan Rule 6.3.2.9**

All occupiers within the Otago region shall, upon receipt of a written notice from an Authorised Person, eliminate spartina infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being and environment values are minimised.

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**Plan Rule 6.3.2.10**

All occupiers within the Otago region shall eliminate white-edged nightshade infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic wellbeing and environment values are minimised.

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**Advice Note**


Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.3.3 Pests to be managed under progressive containment programmes by Otago Regional Council

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 13 below.

Table 13: Characteristics and threats of pests in progressive containment programmes

Description of the pests and adverse effects	
Plants	
<p><b>African love grass</b> is a vigorous, clump-forming, perennial grass up to 1.5m tall. It is densely tufted with narrow leaves (harsh to touch) and usually curly at the tips. The leaves are bright green to blue-green (leaves turn bronze-red after a hard frost). Leaf margins rolled inwards and are usually hairless. It has fibrous roots, up to 50cm deep. The flower heads (panicles) are pyramid-shaped with small, white flowers. Its blackish, olive-purple seeds are attached to arching stems over 1m long.</p> <p>Infestations are limited to 20 active sites across the Otago region. The plant is capable of rapidly invading bare and disturbed sites. Once established, it forms dense stands and suppresses other herbaceous species. It is a prolific seeder, has low palatability for grazing animals and is difficult to detect.</p> <p><del>For these reasons, it is included in the <u>Plan Proposal</u>.</del></p>	

The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained (ORC responsibility) are set out in Table 14 below. ~~An explanation of alternative means is also provided.~~

Table 14: Aim and means of achievement for pests in progressive containment programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.3.3</b></p> <p>Over the duration of the Plan, progressively contain and reduce the geographic distribution or extent of African love grass at known sites (as shown on Map 1 in Appendix 3) within the Otago region to minimise or prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the <u>Plan Proposal</u> will be used by Otago Regional Council to achieve Objective 6.3.3.</p> <p>Generally, Otago Regional Council will carry out the necessary control work to remove African love grass. It is useful however for occupiers to report the presence of African love grass at sites outside of the known sites.</p> <p><del><b>Alternatives considered</b></del></p> <p><del>Relying on occupiers to undertake voluntary action or requiring them to act to prevent</del></p>

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~~adverse effects caused by African love grass is not considered viable. African love grass is difficult to identify and the low levels of infestations may result in many plants not being removed in a timely manner.~~

~~It is therefore preferable for beneficiaries rather than exacerbators to bear the responsibility for this programme.~~

~~There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.~~

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.3.4 Progressive containment programme for wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch

The characteristics of wilding conifers to be managed under this programme, and adverse effects that they pose, are set out in Table 15 below.

Table 15: Characteristics and threats of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch

#### Description of the pest and adverse effects

**Wilding conifers** can have significant impacts on native ecosystems, particularly those with low-stature vegetation<sup>2</sup>. Wilding conifers grow faster and taller than low-stature native plants and so can shade out many of these species. Where there is dense wilding conifer growth, this can lead to local extinction of native plant communities, the drying of wetlands and riparian areas, and resulting impacts on native fauna through the loss of habitat. Soil and soil fauna are also altered when wilding conifers replace native ecosystems.

Otago's iconic landscape is vulnerable to the invasion of wilding conifers. If not controlled, they would significantly change the landscape and impact on our recreational, hydrological and conservation values. Particularly at risk is our high country and tussock grasslands. The growing problem has been recognised for some years, and as a result, the Wakatipu Wilding Conifer Control Group and the Central Otago Wilding Control Group established themselves solely to fight wilding conifers.

A National Wilding Conifer Control Programme has been developed and funded by government agencies, landowners, and local communities to address infestations. The extent within Otago ranges from very dense wilding infestations in the Wakatipu area, through to very low wilding conifer numbers scattered over thousands of hectares. Control efforts to date have been very successful where the work has been carried out, but will require an ongoing effort for many years to come in follow-up work, and in areas where control is yet to be undertaken. The seed source for spread is in some cases from planted conifers in the form of shelterbelts and forestry plantations.

Most wilding conifer species do not pose a significant threat to established native forests, however some species are adapting to new areas and in particular, Douglas fir has a higher shade tolerance than other introduced conifer species and can consequently spread into shrublands, regenerating native forest and mature



<sup>2</sup> Indigenous ecosystems at particular risk from wilding conifer invasion include: tussock and other indigenous grasslands, alpine ecosystems, subalpine and dryland scrub and shrublands, frost-flats, wetlands, turf communities, geothermal areas, dunelands, ultramafic/serpentine areas, rockfields and herbfields, riparian areas, coastal margins, bluffs and cliffs.

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forest where there are canopy gaps and a relatively sparse understory.

Wilding conifers can adversely affect amenity and landscape values, particularly where the valued landscapes are characterised by extensive low-stature vegetation such as high country tussock grasslands. These landscapes are important for tourism and large-scale landscape changes could impact on this. Dense wilding conifer spread can impact water availability lead to the blocking and/or changing of valued views and vistas, and can impede access to, and enjoyment of, recreational areas.

In areas where there is long-term, seasonal soil moisture deficits, dense wilding conifers can contribute to reductions in surface water flows, potentially impacting on water availability and aquatic ecosystems. Wilding conifers can also increase the risk posed by wild fires.

In areas of extensive pastoral farming, wilding conifer infestations adversely impact economic well-being by reducing available grazing land and limiting future land use options due to the high costs of control.

~~Wilding conifers are included in this Plan Proposal for the above reasons.~~

#### **Contorta (lodgepole) pine, Corsican pine, Scots pine, dwarf mountain pine, mountain pine and larch**

In addition to the adverse effects listed above for the wilding offspring of these conifers, wilding conifers often occur as a result of seed spread from planted conifer trees. It can be difficult to successfully control or manage the spread of wilding conifers over the long term if the seed source is not removed or appropriately managed and contained. This set of conifers has ~~very~~ limited commercial value and they are also highly invasive. It is therefore appropriate to specify these organisms as pests in their own right, in addition to being pests under the wilding conifer definition in their naturally regenerated state. As set out in Tables 2 and 3 it would effectively prevent new plantings of these species, and ensure where these species are cleared using publicly funded control operations that they stay clear.

Contorta in particular, is an unwanted organism, is the most invasive introduced conifer species and represents a significant proportion of all wilding conifers and original sources of wilding conifer spread.

#### **Existing planted conifers less than 1ha**

Existing contorta shelter belts and other conifer shelterbelts are often used to provide shelter for stock.

It can be difficult to successfully control or manage the spread of wilding conifers over the long-term if the existing planted seed sources are not removed or appropriately managed and contained. The Plan does not include rules requiring the removal of existing shelter belts and other existing planted conifers less than 1ha. Rather, transition arrangements for their long-term

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removal, starting with the removal of contorta shelter belts, are outlined in the ~~proposed Biosecurity Strategy attached to this Plan Proposal.~~

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The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained are set out in Table 16 below. ~~An explanation of alternative means is also provided.~~

**Table 16: Aim and means of achievement for wilding conifer progressive containment programmes**

<b>Objective, Principal Measures and Rules</b>	
<p><b>Plan Objective 6.3.4</b></p> <p>Over the duration of the Plan, progressively contain and reduce the geographic extent of wilding conifers<sup>3</sup> within the Otago Region to minimise adverse effects on economic well-being and the environment. This may involve the destruction of contorta, Corsican, Scots, mountain and dwarf mountain pines and larch.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, collaboration, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the <del>Plan Proposal</del> may be used by Otago Regional Council to achieve Plan Objective 6.3.4.</p> <p>Plan Objective 6.3.4 is also achieved under The National Wilding Conifer Control Programme – a collaborative funding model for wilding conifer control. Parties to this programme could include the Ministry for Primary Industries, Department of Conservation, Land Information New Zealand, Otago Regional Council and private land holders.</p> <p><b>Alternatives considered</b></p> <p><del>Relying on voluntary action of individuals to achieve Plan Objective 6.3.4 is not considered viable due to the nature of the pest and the lack of incentives for voluntary action. Otago Regional Council could take on the responsibility for region-wide wilding conifer control. However, the extent of infestations is such that it is beyond the financial resources of the ratepayers. Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>

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<sup>3</sup> Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1ha or more of predominantly planted trees. This also excludes existing planted conifers of less than 1ha, such as windbreaks and shelterbelts existing before March 2019.



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**Plan Rule 6.3.4.1**

Within the Otago Region occupiers shall destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch present on land that they occupy prior to cone bearing, if –

- a) the wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines, and/or larch are located within an area which has had control operations carried out to destroy wilding conifers since January 2016; and
- b) the control operations were publicly funded (either in full or in part).

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

**Explanation of rule**

The purpose of this rule is to ensure that ~~new~~ reinfestations of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch are prevented from ~~re~~-establishing at sites where wilding conifers have previously been destroyed through publicly funded control operations.

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**Plan Rule 6.3.4.2**

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, if –

- a) wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property; and
- b) the control operations on the adjoining property were within 200m of the boundary and were undertaken since January 2016.

A breach of this rule or any part thereof creates an offence under section 154N(19) of the Act.

**Explanation of rule**

Over the duration of the Plan, to ensure that the spread of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch does not cause unreasonable costs to the occupiers of adjoining properties, where wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property.

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

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**Plan Rule 6.3.4.3****Note: This is designated a Good Neighbour Rule**

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 –

- a) the adjoining land has previously been cleared through control operations since January 2016; and
- b) the occupier of that adjoining land is taking reasonable steps to manage wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch on their land, within 200m of the boundary.

A breach of this rule creates an offence under section 154N(19) of the Act

**Explanation of rule**

Over the duration of the Plan, to ensure that the spread of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch does not cause unreasonable costs to the occupiers of adjoining properties, where wilding conifers have previously been destroyed through control operations on the adjoining property and the adjoining occupier is undertaking active wilding conifer management.

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

The rule is required in addition to Plan Rule 6.4.3.2 as the National Policy Direction requires that before a rule can be identified as a good neighbour rule, the Otago Regional Council must be satisfied that the adjacent occupier is taking reasonable measures to manage the pest or its impacts.

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#### **Plan Rule 6.3.4.4**

##### **Note: This is a pest agent rule**

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 –

- a) wilding conifers: contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property; and
- b) the control operations on the adjoining property were within 200m of the boundary and were undertaken since January 2016.

#### **Explanation of rule**

Introduced conifer species are capable of contributing toward the establishment and 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 and contorta, Corsican, Scots, mountain or dwarf mountain pines, larch and/or other planted conifer species 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.

#### **For the purpose of this rule**

**Pest Agent Conifer** means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.

**Plantation forest** means a forest deliberately established for commercial purposes, being at least 1 hectare of continuous forest cover of forest species that has been planted and has or will be harvested or replanted.

**Forest species** means a tree species capable of reaching at least 5 metres in height at maturity where it is located.

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

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#### **Advice Notes**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

Occupiers may make an application to the Otago Regional Council for an exemption from the rules under section 78 of the Biosecurity Act 1993. This section should be referred to in full in the Act.

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## 6.4 PESTS TO BE MANAGED UNDER SUSTAINED CONTROL PROGRAMMES

### 6.4.1 Introduction

There are a number of pests that are securely established in the Otago region and therefore containing their presence is the most appropriate form of management. In some cases, spread from infested areas across property boundaries to neighbouring areas that are clear or being cleared will be prevented eg. gorse or nodding thistle. For others it is a case of holding population levels to acceptable limits eg. feral rabbits. The pests that are subject to sustained control programmes are listed in Table 17 below.


Table 17: Pests to be included in sustained control programmes

Common name	Scientific name
<b>Plants</b>	
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>
Gorse	<i>Ulex europeaus</i>
Nodding thistle	<i>Carduus nutans</i>
Ragwort	<i>Senicio jacobaea</i>
Wild Russell lupin	<i>Lupinus polyphyllus</i>
<b>Animals</b>	
Feral rabbits	<i>Oryctolagus cuniculus</i>

### 6.4.2 Description and adverse effects of pests to be managed under sustained control programmes

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 18 below.

Table 18: Characteristics and threats of pests in sustained control programmes

Description of the pests and adverse effects	
<p><b>Broom</b> (common) is a leguminous, branched perennial shrub up to 2.5m tall with bright yellow flowers. Stems are green and woody, five ribbed and hairless. Montpellier broom, while somewhat smaller in stature, except for slightly smaller yellow flowers, is very difficult to distinguish from common broom. They are therefore treated together. Dark ripened seedpods explode during summer, propelling hard seed up to 5m from the parent plant. The seed may also land on stock, particularly sheep, or in water and be transported much further. Seed can remain viable for many years (&gt;50 years) in soil and gravel. Transport of such infested material can contribute to spread over longer distances.</p>	

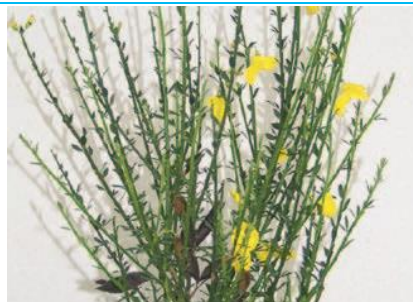
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Broom is capable of establishing on land throughout the region. However, large areas of Central Otago and the Queenstown Lakes are predominantly clear of infestations. Where it is present, density varies from light to heavy depending upon the intensity of grazing management. It is most prevalent on lightly grazed or non-grazed areas.

Broom seedlings are unable to compete with productive pasture. Where insufficient grazing pressure is exerted, the plants can establish dense stands that can shade out most other herbaceous species and destroy pasture.

Provided taller tree species can become established within broom colonies, they will eventually displace broom.

~~Broom is included in the Plan Proposal for the above reasons.~~



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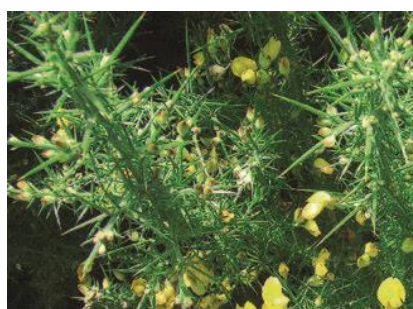
**Gorse** is a sharply spinous, woody, deeply rooted, leguminous perennial shrub. It grows up to 4m tall with thick stems. Seeds can be ejected up to 5m from pods and the plant may seed twice a year. Seed may survive in the soil for more than 50 years.

Gorse is capable of establishing on land throughout the region. However, large areas of Central Otago and the Queenstown Lakes are predominantly clear of infestations. Density varies from light to heavy depending upon the intensity of grazing management. It is most prevalent on lightly grazed and non-grazed areas.

Gorse forms dense thickets that prevent stock from grazing infested areas. Seed may be spread by water, birds, road-making, gravel extractions, animals and machinery.

It is generally perceived as a threat to pastoral values and low stature indigenous vegetation. However, if left undisturbed and in the presence of a seed source, tall indigenous vegetation particularly can overtop and suppress gorse.

~~Gorse is included in the Plan Proposal primarily because the adverse effects, overall, outweigh its beneficial attributes.~~



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**Nodding thistle** is an annual or biennial thistle that grows from an over-wintering rosette and is similar to the Scotch thistle, although more erect and spiny. Its flowering stems grow up to 1.5m high bearing large crimson flower heads that droop or “nod” when mature.

Nodding thistle is found on sheep farming areas in many parts of Otago. A single mature plant is capable of producing up to 10,000 seeds. It is not readily grazed because of its spiny foliage. Single rosettes can occupy an area greater than one square metre, so large infestations can seriously reduce the stock carrying capacity of affected pasture. The plant is resistant to drought and seed can remain viable for up to 20 years.

~~It is included in the Plan Proposal for these reasons.~~



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**Ragwort** is an erect biennial or perennial herb that is commonly 45-60cm tall but can grow to almost 2m high. It produces bright yellow flowers in clusters, from November to April.

The plant is toxic to grazing cattle, deer and horses because its poisonous alkaloids cause liver cirrhosis, photosensitisation, jaundice and wasting. Poisoned animals may take some months to die. They do however electively avoid grazing it.

Sheep will eat Ragwort without any apparent adverse effects, unless they are continually exposed to it in large quantities, or if they are not used to feeding on it.

It can dominate pasture once established, almost completely excluding other pasture species in the worst instances, and significantly reducing the amount of grazing available to stock. Also, the plant is invasive in riverbeds, disturbed forest and shrubland, coastal areas, bare land and other short-stature vegetation types. It forms dense stands in these areas as it does in pasture. However, it usually disappears when a canopy forms, which decreases light levels reaching the ground layer.

~~For these reasons, it is included in the Plan Proposal.~~



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**Russell lupin** is a quick growing perennial herb, up to 1m tall, with multiple, erect, hairy stems with clusters of 8-15 leaflets (3-13 x 1-3cm) that are usually hairless above and silky below. Produces an erect flowerhead spike (15-60cm long) bearing many slightly scented and multiple coloured flowers (12-20mm) from September to February. The plant produces a large amount of mottled dark brown seed that are spread mainly by water and also by humans distributing them along roadsides. The seed remains viable for many years.

Russell lupin tolerates wind, warm to cold, flooding and drought, low fertility (fixes nitrogen) and fire. Intolerant of moderate shade. It rapidly invades shingly braided river systems and the dense, self-replacing stands provide hiding places for predators of the (often endangered) birds that would usually nest safely on these bare islands. The dense infestations also interfere with water flow along these rivers, changing the ecosystem for the birds and aquatic species that rely on this habitat. ~~live there.~~ Increased soil nitrogen may induce change in species composition in plant communities from low fertility species to weed species. Causes sand and gravel to build up, altering shape of rivers and contributing to flooding and erosion. Increased cover may prevent some birds (eg. dotterels, wrybills) nesting, and may increase predation by cats, mustelids, etc. on birds.

Disturbed lowland and sub-alpine shrubland, short tussock-land and wetlands are susceptible to invasion.

~~For these reasons, wild Russell lupin is included in the Plan Proposal.~~



### 6.4.3 Sustained control programme for broom and gorse

The management aims and the range of methods to be used to accomplish the aims for broom to be managed under the sustained control programme in Otago is set out in Table 19 below. ~~An explanation of alternative means is also provided.~~

Table 19: Aim and means of achievement for sustained control of [gorse and broom](#)

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.3</b></p> <p>Over the duration of the Plan, <del>implement</del> <u>sustained control of</u> <del>sustainably control</del> broom and gorse to ensure land that is free of, or being cleared of, broom and gorse does not become infested, to prevent adverse effects on production values and economic well-being.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, collaboration, service delivery, advocacy and education, and collaboration</b> described in section 5.3 of the <del>Plan Proposal</del> may be used by Otago Regional Council to achieve Plan Objective 6.4.3.</p> <p>Generally, occupiers will be responsible for control of broom although Otago Regional Council may provide some assistance e.g. sourcing and releasing biological control agents.</p> <p><del><b>Alternatives considered</b></del></p> <p><del>Relying on voluntary action of individuals to achieve Plan Objective 6.4.3 is not considered viable due to the nature of the pest and the lack of incentives for voluntary action.</del></p> <p><del>Otago Regional Council could take on the responsibility for region-wide control. However, the extent of infestations is such that it is beyond the financial resources of the ratepayers.</del></p> <p><del>Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community.</del></p> <p><del>This alternative is therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>
<p><b>Plan Rule 6.4.3.1</b></p> <p>All occupiers within the Gorse and Broom Free Areas as shown on Maps <del>32</del> in Appendix 3 shall eliminate all broom infestations on the land that they occupy.</p> <p>This rule shall not have legal effect <del>for</del> <u>within</u> the New Gorse and Broom Free Areas as illustrated on Map 2 in Appendix 3 until <del>March 31</del> <u>31 October</u> 2024.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to maintain the past investment by occupiers in establishing areas clear of broom within properties.</p> <p>Otago Regional Council will proactively support all land occupiers within the New Gorse and Broom Free Areas to clear these areas prior to Rule 6.4.3.1 having legal effect <del>in</del> <u>from</u> <u>31 October</u> 2024.</p>

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**Plan Rule 6.4.3.2****Note: This is designated a Good Neighbour Rule**

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 and/or environmental values.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to manage the spread of broom causing unreasonable costs to an adjacent occupier where active broom management is being undertaken by that land occupier.

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

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**Plan Rule 6.4.3.3**

All occupiers within the New Gorse and Broom Free Areas as shown on Map 2 in Appendix 3 shall eliminate all gorse infestations on the land that they occupy.

This rule shall not have legal effect for the New Gorse and Broom Free Areas as shown on Map 2 in Appendix 3 until March 31 October 2024.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to maintain the past investment by occupiers in establishing areas clear of gorse within properties.

Otago Regional Council will proactively support all land occupiers within the New Gorse and Broom Free Areas to clear these areas prior to Rule 6.4.3.3 having legal effect ~~in~~ from 31 October 2024.

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**Plan Rule 6.4.3.4****Note: This is designated a Good Neighbour Rule**

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 and/or environmental values.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to manage the spread of broom causing unreasonable costs to an adjacent occupier where active broom management is being undertaken by that land occupier.

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

#### 6.4.4 Sustained control programmes for nodding thistle and ragwort

The management aims and the range of methods to be used to accomplish the aims for nodding thistle and ragwort to be managed under the sustained control programme in Otago is set out in Table 20 below. ~~An explanation of alternative means is also provided.~~

Table 20: Aims and means of achievement for the sustained control of nodding thistle and ragwort (boundary control)

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.4</b></p> <p>Over the duration of the Plan, <del>implement</del> <u>sustained control of nodding thistle and ragwort on rural zoned land within specified distances of property boundaries throughout the Otago region to prevent their spread in order to minimise adverse effects on production values and economic well-being.</u></p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, collaboration, council inspection, advocacy and education</b> described in section 5.3 of the <del>Plan Proposal</del> will be used by Otago Regional Council to achieve Plan Objective 6.4.4.</p> <p><del><b>Alternatives considered</b></del></p> <p><del>Relying on voluntary action of individuals to achieve Plan Objective 6.4.4 is not considered viable due to the nature of the pest and the lack of incentives for voluntary action. Otago Regional Council could take on the responsibility for controlling the spread of nodding thistle and ragwort. However, the extent of the infestations are such that the logistics of carrying out the control programmes would be difficult to integrate with individual property occupier management requirements. It is also unlikely to be cost effective.</del></p> <p><del>Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>
<p><b>Plan Rule 6.4.4.1</b></p> <p><b>Note: This is designated a Good Neighbour Rule</b></p> <p>All occupiers in the Otago region on rural zoned land shall eliminate nodding thistle infestations on their land within 100m of the <del>adjoining</del> property boundary where the occupier of the adjoining property is eliminating nodding thistle infestations within 100m of that boundary.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to manage the spread of nodding thistle causing unreasonable costs to an adjacent occupier who is undertaking active nodding thistle management within 100m of their property boundary.</p> <p>Any action pertaining to non-compliance will only be initiated upon a complaint from the adjoining affected occupier.</p>
<p><b>Plan Rule 6.4.4.2</b></p>	<p><b>Explanation of rule</b></p>



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**Note: This is designated a Good Neighbour Rule**

All occupiers in the Otago region on rural zoned land shall eliminate ragwort infestations on their land within 50m of the adjoining property boundary where the occupier of the adjoining property is eliminating ragwort infestations within 50m of that boundary.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

A breach of this rule creates an offence under section 154N(19) of the Act

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The reason for this rule is to manage the spread of ragwort causing unreasonable costs to an adjacent occupier who is undertaking active ragwort management within 50m of their property boundary.

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

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

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#### 6.4.5 Sustained control programme for Russell lupin

The management aims and the range of methods to be used to accomplish the aims for Russell lupin to be managed under the sustained control programme in Otago as set out in Table 21 below. ~~An explanation of alternative means is also provided.~~

Table 21: Aims and means of achievement for the sustained control of wild Russell lupin

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.5</b></p> <p>Over the duration of the Plan, <u>implement sustained control of</u> <del>sustainably control</del> the extent of <del>wild Russell lupin and wild Russell lupin</del> within specified distances from waterways <u>and property boundaries</u> to preclude establishment of wild Russell lupin and to prevent adverse effects on environmental values.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, service delivery, advocacy and education, and collaboration</b> described in section 5.3 of the Plan will be used to achieve Plan Objective 6.4.5.</p> <p><b>Alternatives considered</b></p> <p><del>Relying on voluntary action of individuals to achieve Plan Objective 6.4.5 is not considered viable due to the nature of the pest and the lack of incentives for voluntary action. Otago Regional Council could take on the responsibility for controlling the spread of wild Russell lupin. However, the extent of the infestation is such that it is also unlikely to be cost effective and is beyond the financial resources of Otago Regional Council.</del></p> <p><del>Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p>

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There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.

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#### **Plan Rule 6.4.5.1**

##### **Note: This is a pest agent rule**

On rural zoned land within the Otago region, no ~~wild~~ Russell lupin shall be planted within:

- (a) 200m of the outer gravel margin of a braided river as measured at the time of planting, or if there is no outer gravel margin beyond the active channel, 200m from the edge of the active channel of a braided river;
- (b) 50m from any non-braided river; except where this may be reduced to 10m from any intermittent non-braided river which is not located within an at-risk catchment and the planting is in accordance with a certified Russell Lupin Management Plan;
- (c) 10m from any artificial watercourse; or
- (d) 10m from an adjoining property boundary.

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

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#### **Explanation of rule**

The reason for this rule is to prevent wild Russell lupin establishing within the specified distances from waterways and adjoining property boundaries.

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For the purpose of ~~this rule~~ Rules 6.4.5.1-3:

**Artificial watercourse** means a watercourse that is created by human action. It includes an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal channel. It does not include artificial swales, kerb and channelling or other watercourses designed to convey stormwater.

**Braided river** means any river with multiple, successively divergent and rejoining channels separated by gravel islands.

**Non-braided river** means a continually or intermittently flowing body of fresh water that is not a braided river; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).

**River** means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).

**At risk catchment** means the Dart, Rees, Matukituki, Makarora, Hunter and Shotover (downstream of Arthurs point) river catchments.

**Russell Lupin Management Plan** means a management plan prepared by an occupier, and certified by the Council, which:

- Identifies all rivers on a property, including all intermittent rivers of a property where the property occupier may plant Russel lupin up to 10m from the river; and
  - Identifies where Russell lupin may be planted on a property; and
  - provides information on how the sowing of Russell lupins on the property will avoid encroaching within the identified 10m setback areas; and
  - provides information on the ongoing farm management practices that will be applied to avoid Russell lupin spreading into the identified 10m setback areas.
-

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The Russell Lupin Management Plan must be submitted to the Otago Regional Council at least 90 working days prior to planting for certification that it contains the matters listed above and does not compromise the achievement of Plan Objective 6.4.5.

When certifying the Russell Lupin Management Plan the Otago Regional Council shall consider:

- The extent to which the sowing and farm management practices proposed will avoid the spread of Russell lupins in and along rivers;
- The intermittence of the river (how frequently the river flows);
- The aquatic species that may be present in the river or downstream of the river;
- The bird habitat provided by the river or downstream of the river; and
- Any other environmental values associated with the river or downstream of the river.

The maximum duration of a Russell Lupin Management Plan is 10 years.

A Russell Lupin Management Plan may be reviewed by the ORC at any time for the purposes of ensuring that the achievement of Plan Objective 6.4.5 is not compromised.

A Russell Lupin Management Plan may also be reviewed by the occupier at any time. Any amendments resulting from the review that are more than minor must be certified by the Council prior to implementation.

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#### **Plan Rule 6.4.5.2**

All occupiers on rural zoned land within the Otago region shall eliminate all wild Russell lupin within:

- 200m of the outer gravel margin of a braided river ~~as measured at the time of planting~~, or if there is no outer gravel margin beyond the active channel, 200m from the edge of the active channel of a braided river;
- 50m from any non-braided river;
- 10m from any artificial watercourse; or
- 10m from an adjoining property boundary.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set seed.

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

#### **Explanation of rule**

The reason for this rule is to prevent wild Russell lupin establishing and seeding within the specified distances from waterways and adjoining property boundaries.

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#### **Plan Rule 6.4.5.3**

##### **Note: This is designated a Good Neighbour Rule**

All occupiers on rural zoned land and crown owned and public conservation estate land within the Otago Region shall, on receipt of a written notice of direction from an Authorised Person, eliminate all wild Russell lupin within 10m of the adjoining property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate wild Russell lupin within 10m of that boundary.

#### **Explanation of rule**

The purpose of this rule is to manage the spread of wild Russell lupin causing unreasonable costs to an adjacent occupier where active wild Russell lupin management is being undertaken by that land occupier.

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

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#### 6.4.6 Sustained control programme for feral rabbits

The characteristics of feral rabbits to be managed under sustained control, and adverse effects that they pose, are set out in Table 22 below.

Table 22: Characteristics and threats of feral rabbits under a sustained control programme.

##### Description of the pests and adverse effects

**Feral rabbits** (wild European) are a small mammalian herbivore, grey-brown (or sometimes black) in colour ranging in length from 34 to 50cm and weighing approximately 1.1 to 2.5kg. They have a high capacity for reproduction and females may be pregnant for 70% of a year. Early-born does may breed in their natal year. They can produce a total of 20 – 50 young per adult doe. Females are also capable of adjusting litter sizes to food supply, so rabbit populations are capable of rebounding quickly from natural disasters or control pressures.

The rabbits' preferred habitat is grassland below about 1000m altitude, with free draining soils, sunny aspect, and less than 1000mm annual rainfall. They are common throughout the rural areas of the region with such habitat but may also be found in and around lifestyle blocks, rural townships and urban areas. Refer to the rabbit proneness map below (Figure 5) for more information on their distribution in Otago.

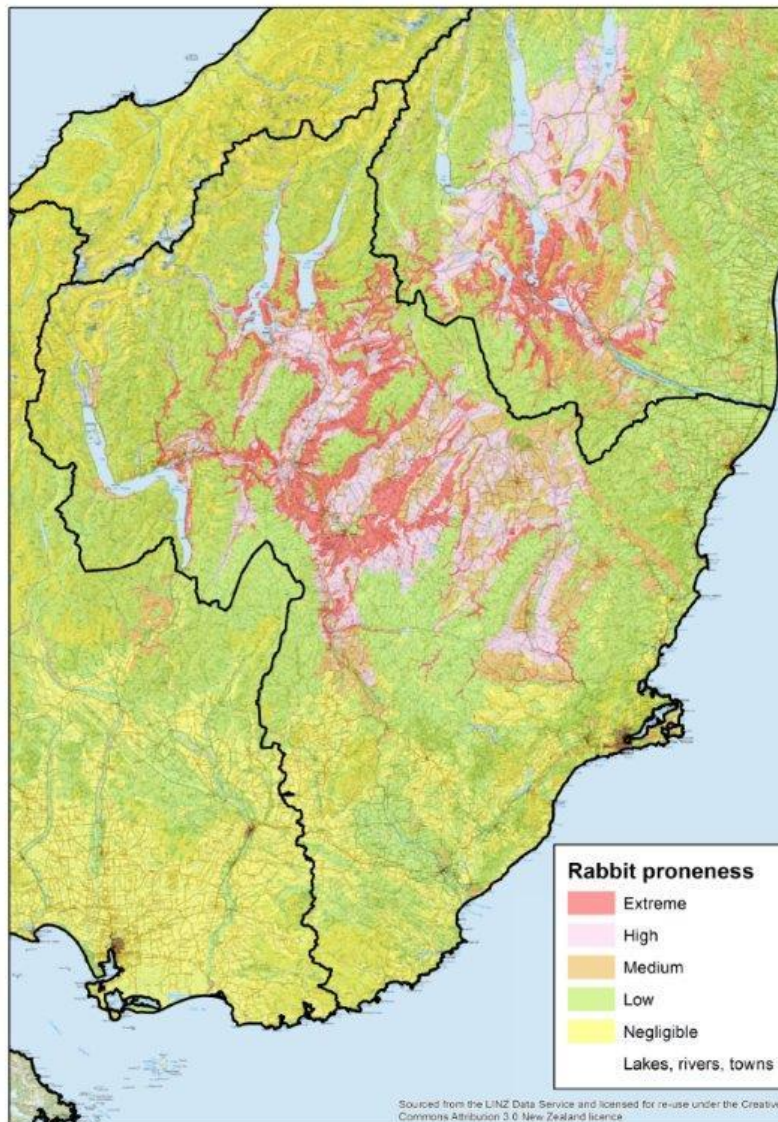
Rabbit Haemorrhagic Disease (RHD) is capable of significantly reducing population levels. However, over time, surviving populations become increasingly resistant to the disease. It is therefore important that alternative control techniques continue to be employed by land occupiers in tandem with RHD to minimise resistant build up. A further RHD strain (K5) has been released during the autumn of 2018.

In general, rabbits compete for pasture and crops with other farm animals and cause land degradation. Rabbits also graze on native vegetation, impacting ecological values. Loss of vegetation reduces soil organic matter, and soils with low organic matter have reduced water-holding capacity and permeability, and therefore reduced soil fertility. Rabbit grazing can also cause soil erosion and stream bank erosion, which can in turn affect water quality. Rabbits may affect native invertebrates and birds by causing changes to habitat and altering predator-prey relationships.

Feral rabbits are included in the Plan Proposal for these reasons.



Figure 5: Rabbit proneness in Otago



The management aim and the methods to be used to achieve that aim are set out in Table 23 below.

Table 23: Aim and means of achievement for sustained control of feral rabbits

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.6</b></p> <p>Over the duration of the Plan, <del>implement sustained control of</del> <del>sustainably control</del> feral rabbits to ensure population levels do not exceed Level 3 on the Modified McLean Scale<sup>4</sup> in order to minimise adverse effects on production and environmental values within the Otago region.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, advocacy and education</b> described in section 5.3 of the <del>Plan Proposal</del> will be used by Otago Regional Council to achieve Objective 6.4.6.</p>

<sup>4</sup> Refer Appendix 2 for Modified McLean Scale.

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Exemptions may be granted in appropriate circumstances where these meet the criteria in accordance with section 78 of the Act.

**Alternatives considered**

~~Relying on voluntary action of individuals to achieve Plan Objective 6.4.6 is not considered viable due to the nature of the pest and the lack of incentives for voluntary action. Otago Regional Council could take on the responsibility for region-wide rabbit control. However, the extent of rabbit infestation is such that the logistics of carrying out the control programmes would be difficult to integrate with individual property occupier management requirements. It is also unlikely to be cost effective.~~

~~Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community.~~

~~This alternative is therefore rejected.~~

~~There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.~~

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**Plan Rule 6.4.6.1**

An occupier within the Otago region shall control feral rabbit densities on the land they occupy to at or below Level 3 on the Modified McLean Scale.

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

**Explanation of rule**

The reason for this rule is to maintain the population levels of feral rabbits to that which prevents adverse effects on the economic values of occupiers, and in so doing, prevent the possible adverse effects on wider environmental values.

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**Plan Rule 6.4.6.2**

**Note: This is designated a Good Neighbour Rule**

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 ~~the~~ that boundary.

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

**Explanation of rule**

The reason for this rule is to manage the spread of feral rabbits causing unreasonable costs to the adjacent occupier where active feral rabbit management is being undertaken by that occupier.

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

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**Plan Rule 6.4.6.3**

Other than under the instruction or supervision of an Authorised Person, no person shall discharge a firearm within or across a property ~~where prior to 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.~~

**Explanation of rule**

The purpose of this rule is to prevent human interference prior to any necessary control operations by Otago Regional Council.

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

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## 6.5 PESTS TO BE MANAGED UNDER SITE-LED PROGRAMMES

### 6.5.1 Introduction

Site-led programmes seek to manage pests whose presence, at or nearby, threaten the values that are special to particular sites (protecting the values at the place). The sites themselves can be determined in two main ways. In the first instance, there are sites within the Otago region that have already been identified through a variety of ways at a district or local scale as having particular values, primarily non-production. In the second instance, there is opportunity for individuals or community groups to promote and pursue further sites that they consider hold values of importance to those people.

Sites managed through site-led programmes may range in extent from small areas within a property to larger areas covering thousands of hectares. Likewise, their values can be threatened by individual or multiple organisms and pest management regimes specifically tailored to each site will be necessary.

This ~~Plan Proposal~~ identifies three sites that manage a range of species encompassing the geographic areas of the Otago Peninsula, West Harbour – Mt. Cargill, and Quarantine and Goat Islands (Map 3 of Appendix 3).

The ~~Plan Proposal~~ also ~~identifies~~ a site-led programme for the management of lagarosiphon in specified lakes and rivers (Map 5 of Appendix 3).

### 6.5.2 Site-Led Programmes

The **Otago Peninsula** is 9,000ha in area and stretches parallel to the Dunedin mainland along the southeast of the Otago Harbour. It joins to the mainland at its southwest end by a narrow isthmus of approximately 1.5km. The Otago Peninsula is home to a number of rare and threatened indigenous species including the yellow-eyed penguin, the New Zealand Sealion, the northern Royal Albatross, and is home to many other indigenous bird, reptile and invertebrate species. Its forest remnants are important habitats.

The **West Harbour – Mt. Cargill area** is an area of approximately 12,500ha north of Dunedin City following the western side of the Otago Harbour, extending from Mt. Cargill and Ravensbourne to Blueskin Bay, Long Beach and Aramoana. This area is home to 11 different ecosystem types containing diverse indigenous flora and fauna. This includes threatened and at-risk plant species, including nationally critical, endangered and at-risk bryophytes. The area is home to rare and threatened indigenous species including the yellow-eyed penguin, the New Zealand sea lion, and many other at-risk and threatened shore birds. It is also home to many other indigenous bird, reptile and invertebrate species, including the South Island kākā, South Island robin, and South Island fern bird.

**Quarantine and Goat Islands** / Kamau Taurua and Goat Island are located within the Otago Harbour between Port Chalmers within the West Harbour – Mt. Cargill area on the western side of the harbour and Portobello on the Otago Peninsula on the eastern side of the harbour. The island provides a stepping stone between these two areas.

The **Lagarosiphon** site-led programme supports the management of lagarosiphon within Lake Wanaka and the Kawarau River, Lake Dunstan and to preclude the re-establishment of lagarosiphon in Lake Wakatipu, and to prevent spread from infested waterways to protect environmental, recreational and amenity values.

More information on these site-led areas and ~~Otago Regional Council~~ ORC's role in their management is available in the ~~proposed~~ Biosecurity Strategy.

The following organisms are classified as pests specifically for the sites outlined above, ~~some at only one site, some at two and the rest at all three sites.~~

Table 24: Pests and their applicable sites (\*) being managed under site-led programmes

Common name	Scientific name	Otago Peninsula	West Harbour – Mt. Cargill	Quarantine and Goat Islands	Lagarosiphon Management Areas
<b>Plants</b>					
Banana passionfruit	<i>Passiflora tripartita var mollissima</i> <i>P. tripartita var azuayansis</i> <i>P. tarminiana</i> <i>P. pinnatistipula</i> <i>Passiflora x rosea</i> <i>P. caerulea</i>	*	*	*	
Chilean flame creeper	<i>Tropaeolum speciosum</i>	*	*	*	
Darwin's barberry	<i>Berberis darwinii</i>	*	*	*	
Sycamore	<i>Acer pseudoplatanus</i>	*	*	*	
Gunnera	<i>Gunnera tinctoria</i>	*	*	*	
Tradescantia (wandering willie)	<i>Tradescantia fluminensis</i>	*	*	*	
Lagarosiphon	<i>Lagarosiphon major</i>				*
<b>Animals</b>					
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus</i>	*	*	*	
Feral cat	<i>Felis catus</i>	*	*	*	
Feral deer (incl. hybrids)	<i>Cervus elaphus</i> , <i>C. nippon</i> , <i>C. dama</i>	*	*	*	
Feral goat	<i>Capra aegagrus hircus</i>	*	*	*	
Feral pig	<i>Sus scrofa</i>	*	*	*	


Hedgehog	<i>Erinaceus europaeus</i>	*	*	*
Mustelids (ferret, stoat, weasel)	<i>Mustelo furo</i> , <i>M. ermine</i> , <i>M. nivalis</i>	*	*	*
Possum	<i>Trichosurus vulpecula</i>	*	*	*
Rat (Norway, ship and Kiore)	<i>Rattus norvegicus</i> , <i>R. rattus</i> <i>R. exulans</i>	*	*	*

Note – In addition, if any other pest contained in this Plan Proposal is present at any site, occupiers remain responsible for their management in accordance with the respective programmes outlined earlier in Chapter 6 unless the site-led programme determines otherwise.

### 6.5.3 Description and adverse effects of pests to be managed under site-led programmes

The characteristics of each of the pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 25 below.

Table 25: Characteristics and threats of pests in site-led programmes

Description and adverse effects	
Plants	
<p><b>Banana passionfruit</b> species are virtually all identical in their characteristics and appearance. They are tall, climbing vines that grow in forest and shrubland margins, stream sides, coastline cliffs, consolidated sand dunes and in domestic gardens. The plants produce large pink tubular flowers throughout the year. These develop into oval fruit that turn yellow to orange-yellow when ripe.</p> <p>This plant produces fruit that is eaten and spread by animals, birds and humans. It is capable of smothering other plants and dominating the canopy. It grows rapidly and its stems will layer. Due to this it poses adverse effects to environmental and biodiversity values of the region.</p> <p>For these reasons, it is included in the <u>Plan Proposal</u>.</p>	

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**Chilean flame creeper** is a climbing, hairless perennial, with a thick rootstock. It has slender stems with curling tendrils (<7cm long) and watery sap. The dull, soft, light green leaves have five leaflets (10-35 x 5-16mm). Solitary, tubular scarlet flowers (15mm diameter) with five irregular petals with the bottom three having a very slender claw (7-8mm long) appear from November to April. A thin, fleshy, deep blue seed capsule (1cm wide) made up of three round parts follows flowering.



Effectively dispersed by birds, established plants are moderately long-lived and develop a scrambling habit. It tolerates warm to cold temperatures, salt, wind, many soil types, and damp to dry conditions.

Within disturbed forest and shrubland, its ability to climb to canopy height and depress light levels causes smothering of bush areas and the prevention of native species establishment.

~~For these reasons, it is included in the Plan Proposal.~~

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**Darwin's barberry** is an evergreen, spiny, yellow-wooded shrub (less than 4m tall) with woody and densely hairy stems that have tough, 5-pronged, needle-sharp spines. Hairless, glossy, dark green leaves (10-30mm x 5-15mm) are usually spiny-serrated along edges. Hanging clusters (7cm long) of deep orange-yellow flowers (5-7mm diameter) appear from July to February followed by oval purplish-black berries (5-7mm diameter) with a bluish-white surface.



This long-lived plant tolerates moderate to cold temperatures, damp to dry conditions, high wind, salt, shade, damage, grazing (not browsed), and a range of soils. Birds and possibly possums eat the berries and subsequently spread the seeds. Berries are also occasionally spread by soil and water movement.

It is capable of invading pasture, disturbed forest, shrubland, tussockland, along roadsides and other sparsely vegetated sites. The plant forms dense colonies that replace existing vegetation and prevent the establishment of desirable plants. Darwin's barberry will also establish under canopy in forest and shrubland. It can grow more rapidly than native species when suitable conditions arise, allowing it to dominate sites where it establishes.

~~For these reasons, it is included in the Plan Proposal.~~

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Gunnera is a large, clump-forming, summer-green herb (up to 2m) growing from stout horizontal rhizomes with large sized leaves (80 cm x 1 m) on sturdy stalks. Both leaves and leaf stalks are covered in rubbery red prickles. Gunnera dies down over winter in cold climates and grows new leaves in spring from large, lobed, scaly buds (25 cm long) that are pinkish-green when fresh and dry to brown. It produces small densely packed green flowers in summer on long, erect, conical spikes which develop into reddish, oblong fruit (1.5-2mm long), each containing a single oblong seed.



Source: Weedbusters

It is known in other regions in New Zealand to shade out other plants, form dense stands/clumps and to spread to bluffs, wet cliffs and near waterways. It is present on the Otago Peninsula.

~~For these reasons, it is included in the Plan Proposal.~~

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**Sycamores** are a deciduous tree (<20m tall) with smooth grey bark and hairless green shoots. Large buds (<5cm long) have pinkish inner scales. Bluish-green 5-lobed leaves (8-14 x 10-20cm) are in opposite pairs on reddish stems. Flowerheads (October-November) are narrow drooping clusters (5-15cm long) of many dense, green flowers (2-4mm long), followed by reddish, winged, 'helicopter' seed capsules (2-4cm long) containing two seeds (5-10mm long).



Source: Environment Southland

The plant is persistent and forms dense (often pure) stands. Produces many long-lived seeds that are well dispersed by wind and water. Seedlings are shade tolerant. It tolerates warm to very cold, moist to dry, most soils, wind and salt. Possibly able to release toxins into the soil to stop other plants growing near it.

It invades disturbed and intact forest and shrubland, short tussockland, fern-land, river systems and bare land. The dense stands prevent recruitment of other species.

~~For these reasons, it is included in the Plan Proposal.~~

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**Tradescantia** (wandering willie) is a trailing, soft, hairless, perennial groundcover with succulent, soft, creeping stems that root at all nodes touching the ground. Dark green, shiny, smooth and slightly fleshy leaves (3-6cm long) are oval with pointed tips. White flowers (2cm diameter) produced from December to January are 3-petaled and in small clusters. No fruit or seed is produced in New Zealand. It rapidly establishes from fragments.



The plant is very tolerant of dense shade, severe damage and grazing, wet, most soil types and high to low temperature, but intolerant of frost and drought. Stem fragments are spread by water movement, livestock, dumped vegetation, soil movement, boots and mowers.

The plant invades most damp shaded habitats, especially disturbed and previously grazed forest, shrubland, stream sides, river systems, alluvial

terraces, fern-land, wetlands, and anywhere downstream or adjacent to existing infestations. It smothers ground in light to deep shade, preventing the seedlings of native species from establishing. Causes habitats to open and be invaded by exotic shrubs and vines. Mats growing on riverbanks can break away with water flow and contribute to flooding.

~~For these reasons, it is included in the Plan Proposal.~~



**Lagarosiphon** is a submerged, bottom-rooted perennial, which can form monospecific growths up to 5m tall upon reaching the water surface. The leaves are dark green (16 x 2mm) and have minute serrations along the edges. They are arranged spirally around the stem and are curved backwards or downwards. Tiny pinkish flowers are produced, but, as only female plants are found in New Zealand, no seed is set. It propagates through stem fragments being carried on water currents, boats, fishing gear, aquarium and pond escapes and deliberate planting.

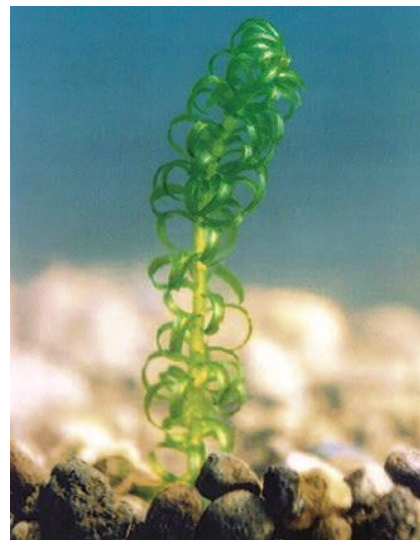
This plant is present in Lakes Dunstan and Roxburgh and parts of Lake Wanaka. It is also present in the Clutha River/Mata-Au and the Kawarau River. Isolated, individual plants are regularly removed from Frankton Arm in Lake Wakatipu, which is thought to be a result of weed transfer by boats from other waterways in the region.

This plant is a potential threat to the aquatic environment because its vigorous growth displaces and shades out aquatic native plants. Dense areas of lagarosiphon may impede water flows and cause local deoxygenation of water. Aesthetic values, recreational activities (such as boating, water-skiing and swimming), and water supply intakes may all be adversely affected where lagarosiphon chokes and blocks water bodies. If lagarosiphon is left uncontrolled, large beds can form, come adrift and leave unsightly heaps on the shore.

~~For these reasons, it is included in the Plan Proposal.~~



Source: NIWA



## Animals

**Bennett's wallaby** – see pest description in section 6.2.2 of the Plan Proposal, Eradication Programmes.



Feral cats are cats that are wild or otherwise unmanaged. Feral cats are not reliant directly on human activities for survival. Feral cats resemble domestic cats in both size and colouration. Adult male cats are generally larger than the females and can weigh up to 5kg. They tend to be solitary and territorial compared to domestic stray or unwanted cats that tend to form colonies. Feral cats are mainly active at night.

Feral cats inhabit a wide range of urban, rural and forest habitats. Diet is wide-ranging and includes small mammals, fish, birds and invertebrates. They have 2-3 litters per year with an average of 4 young in each.

Feral cats have been branded as 'the ultimate predators' in New Zealand and have been nominated as among 100 of the "World's Worst" invaders. New Zealand's unique native wildlife is particularly vulnerable to predation by cats. Feral cats kill young and adult birds and occasionally take eggs, prey on native lizards, fish, frogs and large invertebrates.

Feral cats are implicated in a small way in the spread of Bovine Tuberculosis, with the potential to infect cattle. They also carry parasites and toxoplasmosis that causes abortions in sheep and illness in humans.

Feral and stray cats can be aggressive towards pet cats. Through fighting they cause severe injuries, sometimes resulting in the pet cat having to be put down. Stray cats are likely to interbreed with the un-neutered domestic cat population and may spread infectious diseases.

For these reasons, feral cats they are included in the Plan Proposal.



Source: Environment Southland



Source: DOC

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**Feral deer** are medium to large-sized ungulates ranging in weight from 40kg (female white tailed) to 450kg (wapiti male). Red deer have a reddish-brown coat, while wapiti are chestnut brown with a distinctive cream rump. ~~The coats of sambar are dark brown with a tan-rust red rump, while rusa are dark reddish-brown.~~ Sika deer have a black dorsal stripe, white rump, chestnut brown sides with white spots. The coats of white tailed deer are light brown with white undersides and rump. Fallow deer have coats of varying brown colours.



Source: DOC

Feral deer are a valued recreation resource for hunters.

Feral deer live in a wide range of habitats, particularly forest. They consume large quantities of native seedlings and saplings which reduces vegetation biomass and leads to failure in recruitment of a range of woody and herbaceous species and alters habitat for native fauna.

Heavy and selective browsing on trees and shrubs can change forest structure and the composition of the understorey. Palatable plant species such as schefflera/pate, broadleaf, three-finger, lancewood, and hen and chicken fern can be all but removed from the ground tier. Sika deer often target species considered unpalatable to other deer.

~~They are included in the Plan Proposal for the above reasons.~~

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**Feral goats** are sheep-sized animals with short hair, pointed horns and a beard. Colour can be white, black, brown or a combination of these. Males average 39kg, are about 680mm tall and about 1.3m long. Females average 30kg, are about 620mm tall with a body length of 1.2m. Their hooves are leaved with pointed, slightly incurved tips and their eyes are greenish blue.



Source: DOC

They are social animals, disperse slowly, and do not voluntarily cross large rivers. This results in patchy distribution. However, their high birth rates, when in good condition, enable population size to roughly double every two years. The major cause of mortality is hunting, although feral pigs may prey on young goats.

Goats are browsing generalists and feed on woody species in forests. Feral goats impact on indigenous ecosystems through their concentrated browsing and trampling. Even in low numbers, their impacts on forest and scrublands can be serious – they destabilise forest ecosystems, and defoliate and eat the stems of palatable under-storey species, bark saplings, and prevent regeneration of seedlings. Unpalatable shrubs increase, and on some islands, forest ecosystems have been converted to grassland.

Feral goats have few economic impacts, although they may occasionally compete with sheep for feed, and they have a wide range of parasites and diseases in common with sheep. Their range is limited however, and they are controlled relatively easily, so it is not



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considered that they have any significant economic impact.

~~They are included in the Plan Proposal for their adverse effects on indigenous ecosystems.~~

**Feral pigs** can measure 90-200cm in length and weigh 50-90kg. Their colour varies from dark grey to brown or black. Adult males develop tusks that protrude from their mouth. Sexually mature at two years of age, they breed once per year with litter size ranging from 4-6 piglets. Vegetation forms 70% of a pig's diet. Pig rooting can reduce the diversity of seedlings and saplings and cause a dramatic reduction in leaf cover on the forest floor.

Feral pigs can have major effects on native flora and fauna. They eat the tops of native plants and dig up their roots, resulting in the decline of some species. Also eaten are many native invertebrates, native land snails and large quantities of native earthworms. Pig predation of flightless and ground-dwelling birds (e.g. kiwi) has been suggested but rarely confirmed.

~~They are included in the Plan Proposal for their adverse effects on indigenous ecosystems.~~



Source: Environment Southland

**Hedgehogs** are nocturnal insectivores. Their back and sides are completely covered with spines and they roll into a prickly ball when disturbed, or when hibernating. They are widespread through lowland areas, occupying a wide range of habitats.

These animals eat mainly insects however they eat a wide range of food if the opportunity presents itself. They are a potentially serious predator of native invertebrates, lizards, and ground nesting birds.

~~They are included in the Plan Proposal for their adverse effects on indigenous ecosystems.~~



Source: DOC

**Mustelids** (ferrets, stoats, weasels) are small to medium sized carnivores with large home ranges. Ferrets are the largest of the three. Male ferrets grow up to 44cm and females up to 37cm in length. The undercoat is creamy yellow with long black guard hairs that give the ferret a dark appearance. A characteristic black face mask occurs across the eyes and above the nose. Stoats have long, thin bodies with smooth pointed heads. Ears are short and rounded. Males grow up to 30cm and females up to 25cm in length. Their fur is reddish-brown above with a white to yellowish underbelly. Stoats have relatively long tails with a distinctive bushy black tip. Weasels are the smallest and least common mustelid. Males grow to about 20cm. Their fur is brown with white undercoat, often broken by brown spots. Their tails are short, brown and tapering.

Although habitat loss and modification remain the most serious threat to native biodiversity, introduced predators, such as ferrets, stoats, and weasels also pose a significant threat. Mustelids are implicated in the extinction of some indigenous bird species and as the



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major cause of decline of many others. Ferrets are also a threat to agriculture, particularly through their role as a vector (carrier) of Bovine Tuberculosis. Mustelids are a threat to poultry farms and carry parasites and toxoplasmosis, which can cause illness in humans and livestock.

They are included in the ~~Plan Proposal~~ for their adverse effects on indigenous ecosystems.



Source: DOC

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**Possums** are marsupials and the males and females are similar in size; between 650 and 930mm, including a tail of 250 to 405mm. They weigh between 1.4 and 6.4kgs, have a furry body, a long prehensile, bushy tail, a pointed snout, pink nose, long dark whiskers and brown eyes. Possums begin breeding at one to two years of age and juveniles disperse an average of 6km from their home range. Primarily herbivores, they feed on a variety of leaves, flower buds, fruit, ferns, and fungi. They feed also on invertebrates and opportunistically on the eggs and nestlings of birds.

Therefore, they cause extensive defoliation of favoured plant species and progressive change in forest composition to less favoured species occurs. Damage is not however uniform across habitats. Possums can also impact native animals by predation of insect species, snails, and birds.

Possums cause economic effects by damaging exotic forests, eating pasture, and through the spread of Bovine Tuberculosis. However, the possum browsing on pasture is likely to be a minor problem apart from pasture/bush margins. Possums can also damage winter feed and other crops especially on bush/pasture margins. The damage to exotic forests tends to be limited but they are known to damage tree crops and domestic gardens.

Possums are included in the ~~Plan Proposal~~ to address adverse effects to conservation values and to protect the past economic investment Bovine Tuberculosis control. There is evidence to support the link between possums and Tuberculosis in farmed animals. Recent studies show that cattle and deer may lick and nuzzle Tuberculosis-infected possums in the terminal stages of the disease as the possums wander around open ground in daylight.



Source: DOC

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### **Rat (Norway, ship and Kiore)**

Ship rat is a slender rat with large hairless ears, grey-brown on the back with a similarly coloured or creamish-white belly, or black all over. Adults usually weigh 120-160g but can exceed 200g.

Norway rat has brown fur on its back and pale grey fur on its belly. Adults normally weigh 150-300g, may reach up to 500g, and are up to 390mm long. Tail is shorter than head-body length. Breeding commences as early as 3-4 months of age. Females can produce 15-20 young per year.

Kiore has brown fur, white-tipped grey fur on belly, pale feet with dark mark on outer edge of the hind feet. They are smaller than other rats in New Zealand, with a maximum body length of 180mm without tail, and they usually weigh 60g - 80g, maximum 180g.

They occupy a wide range of urban, rural and forest habitats. Ship rats are more common within forest areas.

Omnivorous and opportunistic feeders eating 10% of their body weight per day. This makes them a competitor for food with many species and predators of others. They eat a variety of native flora and fauna, in particular native birds (eggs and fledglings), lizards, and invertebrates. They eat large quantities of native seeds, which reduces regeneration of native plants.

~~They are included in the Plan Proposal because of these adverse effects.~~



Source: Environment Southland

## 6.5.4 Site-led programmes on the Otago Peninsula

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under the site-led programme for the Otago Peninsula are set out in Table 26 below. ~~An explanation of alternative means is also provided.~~

Table 26: Aims and means of achievement for site-led programmes on the Otago Peninsula

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.4.a</b></p> <p>Over the duration of the Plan:</p> <ol style="list-style-type: none"> <li>preclude establishment of feral deer, feral goats, feral pigs and Bennett's wallaby; and</li> <li>eradicate possums; and</li> <li><del>implement sustained control of sustainably control</del> feral cats, <del>rats</del>, hedgehogs and;</li> <li><del>progressively contain</del> mustelids</li> </ol> <p>on the Otago Peninsula (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p> <p><b>Plan Objective 6.5.4.b</b></p> <p>Over the duration of the Plan, progressively contain:</p> <ol style="list-style-type: none"> <li>banana passionfruit;</li> <li>Chilean flame creeper;</li> <li>Darwin's barberry;</li> <li>Sycamore</li> <li>Gunnera; and</li> <li>tradescantia</li> </ol> <p>on the Otago Peninsula (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the <del>Plan</del> <u>Proposal</u> will be used by Otago Regional Council to achieve Objectives <del>6.5.4 and 6.5.5</del> <u>6.5.4.a and 6.5.4.b</u>.</p> <p>It is not proposed to introduce occupier control <del>responsibilities</del> <u>rules</u> at this stage. However, this may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the Objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the <del>proposed</del> Biosecurity Strategy.</p> <p><b><del>Alternatives considered</del></b></p> <p><del>Relying solely on voluntary action without Otago Regional Council support to achieve Plan Objectives 6.5.4.a and 6.5.4.b is not considered viable due to the nature of the pests, the scale of the programme, the effectiveness of voluntary action and the need for a collaborative inter-agency approach, especially given that the beneficiaries of control action lies with the wider community.</del></p> <p><del>It is likely that Otago Regional Council does not have the financial resource to fully fund the programmes. Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>

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**Plan Rule 6.5.4.1**

No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Otago Peninsula (identified on Map 3 in Appendix 3) any:

- a) Bennett's wallaby;
- b) feral deer;
- c) feral goat;
- d) feral pig;
- e) mustelid;
- f) feral cat;
- g) hedgehog; or
- h) possum.

For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

**Explanation of rule**

The reason for this rule is to help achieve the exclusion, ~~or~~ eradication or control of these pests from the Otago Peninsula.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under the site-led programme at West Harbour – Mt. Cargill are set out in Table 27 below. ~~An explanation of alternative means is also provided.~~

Table 27: Aims and means of achievement for site-led programmes at West Harbour – Mt. Cargill

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.5.a</b></p> <p>Over the duration of the Plan:</p> <ul style="list-style-type: none"> <li>a) preclude establishment of feral deer and Bennett’s wallaby; and</li> <li>b) <del>implement sustained control of sustainably control</del> feral cats, feral goats, feral pigs, <u>rats</u>, hedgehogs; and</li> <li>c) <u>progressively contain</u> mustelids; and</li> <li>d) progressively contain possums to achieve a 2% RTC</li> </ul> <p>at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p> <p><b>Plan Objective 6.5.5.b</b></p> <p>Over the duration of the Plan, progressively contain:</p> <ul style="list-style-type: none"> <li>a) banana passionfruit;</li> <li>b) Chilean flame creeper;</li> <li>c) sycamore;</li> <li>d) <u>gunnera</u>;</li> <li>e) Darwin’s barberry; and</li> <li>f) tradescantia</li> </ul> <p>at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the <del>Plan</del> <u>Proposal</u> will be used by Otago Regional Council to achieve Objectives 6.5.5.a and 6.5.5.b.</p> <p>It is not proposed to introduce occupier control <del>responsibilities</del> <u>rules</u> at this stage. However, it may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the Objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the <del>proposed</del> Biosecurity Strategy.</p> <p><b><del>Alternatives considered</del></b></p> <p><del>Relying solely on voluntary action without Otago Regional Council support to achieve Plan Objectives 6.5.5.a and 6.5.5.b is not considered viable due to the nature of the pests, the scale of the programme, the effectiveness of voluntary action and the need for a collaborative inter-agency approach, especially given that the beneficiaries of control action lies with the wider community.</del></p> <p><del>It is likely that Otago Regional Council does not have the financial resource to fully fund the programmes. Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>

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**Plan Rule 6.5.5.1**

No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) any

- a) Bennett's wallaby;
- b) feral deer;
- c) feral goat;
- d) feral pig;
- e) mustelid;
- f) feral cat;
- g) hedgehog; or
- h) possum.

For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

**Explanation of rule**

The reason for this rule is to help achieve the exclusion, eradication or control of these pests from West Harbour – Mt. Cargill.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under site-led programmes at Quarantine and Goat Islands are set out in Table 28 below. ~~An explanation of alternative means is also provided.~~

Table 28: Aims and means of achievement for site-led programmes on Quarantine and Goat Islands

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.6a</b></p> <p>Over the duration of the Plan:</p> <ol style="list-style-type: none"> <li>preclude establishment of Bennett's wallaby, feral cats, feral deer, feral goats, feral pigs, mustelids, hedgehogs<sup>5</sup> and possums; and</li> <li>eradicate rats</li> </ol> <p>on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p> <p><b>Plan Objective 6.5.6b</b></p> <p><u>Over the duration of the Plan, progressively contain:</u></p> <ol style="list-style-type: none"> <li><u>banana passionfruit;</u></li> <li><u>Chilean flame creeper;</u></li> <li><u>Darwin's barberry;</u></li> <li><u>Sycamore</u></li> <li><u>Gunnera; and</u></li> <li><u>tradescantia</u></li> </ol> <p><u>on Quarantine and Goat Islands (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</u></p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the <u>Plan Proposal</u> will be used by Otago Regional Council to achieve <del>Objective 6.5.6. Objectives 6.5.6a and 6.5.6b.</del></p> <p>It is not proposed to introduce occupier control <del>responsibilities</del> <u>rules</u> at this stage. However, it may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the <del>proposed</del> Biosecurity Strategy.</p> <p><b>Alternatives considered</b></p> <p><del>Relying solely on voluntary action without Otago Regional Council support to achieve Plan Objective 6.5.6. Objectives 6.5.6a and 6.5.6b is not considered viable due to the nature of the pests, the scale of the programme, the effectiveness of voluntary action and the need for a collaborative inter-agency approach, especially given that the beneficiaries of control action lies with the wider community.</del></p> <p><del>It is likely that Otago Regional Council does not have the financial resource to fully fund the programmes. Furthermore, the consequences of occupiers no longer owning the problem could lead to over-optimistic expectations on the part of both occupiers and the wider community. This alternative is therefore rejected.</del></p>

<sup>5</sup> Existing information suggests that hedgehogs are not present on Goat Island, however if further research demonstrates that they are, then the objective for hedgehogs on Goat Island will be eradication.



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There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.

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**Plan Rule 6.5.6.1**

No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) any:

- a) Bennett's wallaby;
- b) feral cat;
- c) feral deer;
- d) feral goat;
- e) feral pig;
- f) mustelid;
- g) hedgehog;
- h) possum; or
- i) rat.

For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

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**Explanation of rule**

The reason for this rule is to help achieve the exclusion or eradication of these pests from Quarantine and Goat Islands.

**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.5.7 Site-led programme for lagarosiphon management areas

The management aims and the range of methods to be used to accomplish the aims for lagarosiphon to be managed under site-led programmes within the lagarosiphon management areas are set out in Table 29 below. ~~An explanation of alternative means is also provided.~~

Table 29: Aims and means of achievement for site-led programmes for lagarosiphon management areas

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.7</b></p> <p>Over the duration of the Plan actively manage lagarosiphon to:</p> <ul style="list-style-type: none"> <li>a) <del>progressively contain lagarosiphon in Lake Wanaka and the Kawarau River (Map 5 in Appendix 3) to reduce its extent over the next 10 years</del> <u>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;</u></li> <li>b) <del>sustainably control lagarosiphon in Lake Dunstan (Map 5 in Appendix 3) implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3);</del></li> <li>c) <del>preclude prevent</del> the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3);</li> <li>d) <del>preclude prevent</del> the establishment of lagarosiphon in lakes, and rivers <u>and tributaries</u> <del>excluding Lake Roxburgh and the Clutha River/Mata-au and its tributaries</del> where it is not already present</li> </ul> <p>to avoid, mitigate or prevent effects on the environment, and amenity and recreational values.</p>	<p><b>Principal measures to be used</b></p> <p>Land Information New Zealand will take a lead role in controlling and eradicating lagarosiphon in Otago's lakes and rivers that it administers. Otago Regional Council will work collaboratively with Land Information New Zealand and other partners in the preparation, administration and delivery of 10-year Management Plans for the control of lagarosiphon and in other initiatives to deliver the outcomes in the objectives.</p> <p><del>Land-Occupiers</del> will be responsible for eradicating lagarosiphon within private ponds and aquariums.</p> <p>The <b>requirement to act, service delivery, advocacy, education, and collaboration</b> described in section 5.3 of the Plan, will be used primarily to achieve Plan Objective 6.5.7.</p> <p>How the Otago Regional Council intends to support the delivery of these objectives with Land Information New Zealand is described more fully in Section 3 of the <del>Proposed</del> Biosecurity Strategy.</p> <p><b>Alternatives considered</b></p> <p><del>Otago Regional Council could take on the total responsibility for controlling lagarosiphon. However, Land Information New Zealand is the land occupier of most lakes and rivers in Otago that are affected by lagarosiphon. Relying on voluntary individual action to minimise adverse impacts of lagarosiphon would not be effective due to limited available incentives to do so and the associated risk of spread. These two alternatives are therefore rejected.</del></p> <p><del>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</del></p>
<p><b>Plan Rule 6.5.7.1</b></p> <p>Any person leaving the waters of Lakes Dunstan, Wanaka or Roxburgh or from the Clutha River/Mata-Au and the Kawarau River must immediately remove and safely dispose of all fragments of lagarosiphon from boats,</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to protect waterbodies not currently infested with lagarosiphon from becoming infested and threatening environmental and recreational values.</p>

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equipment and all other items in their possession.

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

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**Plan Rule 6.5.7.2**

Occupiers must destroy and safely dispose of all lagarosiphon in any pond or aquarium on their land.

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

**Explanation of rule**

The reason for this rule is to protect waterbodies not currently infested with lagarosiphon from becoming infested and threatening environmental and recreational values.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.5.8 Adding new site-led programmes to the Plan

The process that will be followed for adding a new site-led programme to the Plan is dependent on whether the programme will have effect on a person's rights or obligations.

If such effects are not significant, the Plan may be amended by Council resolution to include the site in accordance with section 100G of the Act. For example, where minimal regulation is required and there is substantial support among the parties for its inclusion. Guidelines setting out how site-led programmes may be included in the Plan by Council resolution are provided in Appendix 2 of the ~~Proposed~~ Biosecurity Strategy.

In cases where such effects are considered to be significant, the addition will be by a more comprehensive process including appropriate consultation, notification and appeal provisions as required under the Act.

## 7. MONITORING

### 7.1 MEASURING WHAT THE OBJECTIVES ARE ACHIEVING

Anticipated result	Indicator	Method of monitoring	Frequency of monitoring	Reporting to Council
<b>Exclusion Programmes</b>				
Absence of African feather grass, Chilean needle grass, false tamarisk, <u>egeria</u> , <u>hornwort</u> and moth plant from the region	Absence in the Otago region	Reporting by occupiers or other persons	As reported	Annual
		Surveillance programmes	Annual surveillance programme	Annual
<b>Eradication Programmes</b>				
All spiny broom removed	Absence of spiny broom in the Otago region	Population assessment based on inspections	Annual inspection programme	Annual
		Reporting by occupiers or other persons	As reported	Annual
All rooks destroyed	Absence of rooks in the Otago region	Population assessment based on rookery inspections	Annual inspection programme	Annual
		Reporting by occupiers or other persons	As reported	Annual
All Bennett's wallaby destroyed	Absence of Bennett's wallaby in the Otago region	Population assessment based on inspections	Annual / as appropriate inspection programme	Annual and as appropriate
		Reporting by occupiers or other persons	As reported	Annual and as appropriate
<b>Progressive Containment Programmes</b>				
The spatial reduction of African love grass, bomarea, boneseed, bur daisy, cape ivy, nassella tussock, old man's beard, perennial nettle,	Annual decrease in plant population on high risk land	Population assessment as a result of inspection activities	Annual inspection programme	Annual

spartina and white-edged nightshade over the life of the Plan.

The spatial reduction of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch over the life of the Plan.	Control and maintenance is undertaken as part of the National Wilding Conifer Control Programme	Population assessment as a result of inspections in accordance with the National Wilding Conifer Control Programme	Annual inspection programme	Annual
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### Sustained Control Programmes

Gorse and broom does not spread between properties and to gorse and broom free areas	Absence adjacent to boundary fences	Boundary monitoring for presence / absence in response to complaint	Pre and post control operations	Annual
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Gorse and broom is excluded from gorse and broom free areas	Aerial monitoring	Every 2 years (may be more frequent for <u>transitional new</u> gorse and broom free areas)	Every 2 years (may be more frequent for <u>transitional new</u> gorse and broom free areas)
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Nodding thistle and ragwort does not spread between properties where this affects production values on adjacent properties	No spread to adjoining properties	Boundary monitoring for presence / absence in response to complaint	Pre and post control operations	Annual
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Russell lupin and wild Russell lupin <u>do not spread between properties or along waterways</u>	<del>No presence</del> <u>Absence</u> within specified distances to waterways <u>and adjacent to boundary fences</u>	Boundary monitoring for presence / absence in high risk areas	Pre and post control operations	Annual
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### Site Led Programmes

Support the management and control of lagarosiphon in lagarosiphon management areas	Lagarosiphon extent within lagarosiphon management areas does not spread and absence of lagarosiphon in Lake Wakatipu	presence / absence	As reported by lagarosiphon management groups, and Otago Regional Council where required – annual minimum	Annual
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Support the management and control of pests occupying the Otago Peninsula, West Harbour – Mt. Cargill and Quarantine and Goat Islands site-led areas	The reduction of pests within the Otago Peninsula, West Harbour – Mt. Cargill and Quarantine and Goat Islands site-led areas	Predator Free Dunedin and Otago Regional Council monitoring of boundaries and densities	As reported by Predator Free Dunedin and Otago Regional Council where required – annual minimum	Annual
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## 7.2 MONITORING THE MANAGEMENT AGENCY'S PERFORMANCE

Otago Regional Council is the management agency. As the management agency responsible for implementing the Plan, the ~~Otago Regional Council~~ ORC will:

- a. prepare an operational plan within three months of the commencement date of the Plan being approved;
- b. review the operational plan, and amend it if needed;
- c. report on the operational plan each year, within five months after the end of each financial year;
- d. maintain up-to-date databases of complaints, pest levels and densities, and responses from regional council and land owners and/or occupiers.

## 7.3 MONITORING PLAN EFFECTIVENESS

Monitoring the effects of the Plan will ensure that it continues to achieve its purpose. It will also check that relevant circumstances have not changed to such an extent that the Plan requires review. A review may be needed if:

- a. the Act is changed, and a review is needed to ensure that the Plan is not inconsistent with the Act;
- b. other harmful organisms create, or have the potential to create, problems that can be resolved by including those organisms in the Plan;
- c. monitoring shows the problems from pests or other organisms to be controlled (as covered by the Plan) have changed significantly; or
- d. circumstances change so significantly that ~~Otago Regional Council~~ ORC believes a review is appropriate.

If the Plan does not need to be reviewed under such circumstances, it will be reviewed in line with section 100D of the Act. Such a review may extend, amend or revoke the Plan, or leave it unchanged.

The procedures to review the Plan will include officers of the ~~Otago Regional Council~~ ORC:

- a. assessing the efficiency and effectiveness of the principal measures (specified for each pest and other organism (or pest group or organisms)) to be controlled to achieve the objectives of the Plan;

- b. assessing the impact the pest or organism (covered by the Plan) has on the region and any other harmful organisms that should be considered for inclusion in the Plan; and
- c. liaising with statutory authorities and key interest groups on the effectiveness of the Plan.

# PART THREE: PROCEDURES





## PART THREE: PROCEDURES

### 8. POWERS CONFERRED

#### 8.1 POWERS UNDER PART 6 OF THE ACT

The Principal Officer (Chief Executive) of Otago Regional Council may appoint authorised persons to exercise the functions, powers and duties under the Act in relation to the Plan.

~~Otago Regional Council~~ ORC will use those statutory powers of Part 6 of the Act as shown in Table 30, where necessary, to help implement the Plan.

Table 30: Powers to be used from Part 6 of the Act

Administrative provisions	Biosecurity Act Reference
The appointment of authorised and accredited persons	Section 103(3) & (7)
Authorised person to comply with instructions	Section 104(2)
Delegation to authorised persons	Section 105
Power to require assistance	Section 106
Power of inspections and duties	Section 109, 110 112
<u>Entry in respect of offences</u>	<u>Section 111</u>
Duties on exercising powers under section 110 and section 111	Section 112
Power to record information	Section 113
General powers	Section 114 & 114A
Use of dogs and devices	Section 115
Seizure of evidence (under section 111)	Section 118
<u>Power to seize abandoned goods</u>	<u>Section 119</u>
Power to intercept risk goods	Section 120
Power to examine organisms and apply substances	Section 121 & 121A
Power to give directions	Section 122
Power to vaccinate	Section 123
Power to act on default	Section 128
Liens	Section 129
Declaration of restricted areas	Section 130
Declaration of controlled areas	Section 131
Duration of place and area declarations	Section 133

Enforcement of area controls	Section 134
Options for cost recovery	Section 135
Failure to pay	Section 136

**Note:** ~~Otago Regional Council~~ ORC's procedures sets out the procedures it will follow when land owners and/or occupiers or other persons do not comply with the rules or other duties.

## 8.2 POWERS UNDER OTHER SECTIONS OF THE ACT

Any person in breach of a rule in the Plan that specifies that a contravention of the rule creates an offence under section 154N(19) of the Act, can be prosecuted and is liable on conviction under section 157(5) of the Act to a fine.

The Principal Officer (Chief Executive) of ~~Otago Regional Council~~ ORC or Chief Technical Officer (employed under the State Sector Act 1988) may appoint authorised people to implement other biosecurity law considered necessary. One example is where restrictions on selling, propagating and distributing pests (under sections 52 and 53 of the Act) must be enforced. Another example is where owners and/or occupiers of land are asked for information (under section 43 of the Act).

## 8.3 POWER TO ISSUE EXEMPTIONS TO PLAN RULES

Any person may upon representation to Otago Regional Council be exempt from a requirement in a rule set out in Part Two of the ~~Plan~~ Proposal.

The requirements in section 78 of the Act must be met for a person to be granted an exemption. These include:

2. *The council may grant an exemption under subsection (1) only if—*
  - a. *the council is satisfied that granting the exemption will not significantly prejudice the attainment of the plan's objectives; and*
  - b. *the council is satisfied that 1 or more of the following applies:*
    - i. *the requirement has been substantially complied with and further compliance is unnecessary;*
    - ii. *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;*
    - iii. *the requirement is clearly unreasonable or inappropriate in the particular case;*
    - iv. *events have occurred that make the requirement unnecessary or inappropriate in the particular case.*
3. *The council may exempt all persons, a specified class of persons, persons in a specified place, or persons responsible for specified goods or things from a requirement in a rule, without conditions or on conditions that the council considers appropriate.*

4. *The council may grant an exemption under subsection (3) only if the council is satisfied that events have occurred that make the requirement unnecessary or inappropriate.*
5. *Conditions on which the council grants an exemption must be consistent with the purpose of this Part and must be no more onerous than the requirement from which the exemption is granted.*
6. *The council must determine the period of an exemption that the council grants.*

~~Otago Regional Council~~ORC will keep and maintain a register of exemptions granted that records the description, reasons and period of each exemption. The public will be able to inspect this register free of charge during business hours. ~~Otago Regional Council~~ORC may also grant an extension of the period of an exemption.

## 9. FUNDING

### 9.1 INTRODUCTION

The Act requires that funding is thoroughly examined. For a Proposal, this includes:

- analysing the costs and benefits of the Plan and any reasonable alternative measures;
- noting how much any person will likely benefit from the Plan;
- noting how any person's actions or inactions may contribute to creating, continuing or making worse the problems that the Plan proposes to resolve;
- noting the reason for allocating costs; and
- noting whether any unusual administrative problems or costs are expected in recovering the costs from any person who is required to pay.

The proposal is also required to specify:

- a. *the effects that, in the opinion of the person making the proposal, implementation of the plan would have on—*
  - i. *economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga;*
  - ii. *the marketing overseas of New Zealand products; and*
- b. *if the plan would affect another pest management plan or a pathway management plan, how it is proposed to coordinate the implementation of the plans.*

### 9.2 ANALYSIS OF BENEFITS AND COSTS

The Act and its accompanying NPD demand a rigorous analysis of benefits and costs. In order to satisfy the requirements, Otago Regional Council commissioned a report, *Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits* (the CBA Report).

In general, the quantified net benefits consist of the costs of implementing the Plan and the production benefits arising from this action. These are calculated as net present values using a six percent discount rate and a timeframe of 100 years (NPV (6%)). In some situations, it is not always possible or cost effective to accurately monetise benefits and costs. Examples of these non-quantified benefits include mana whenua, biodiversity, recreation, and amenity values. For wallaby and wilding pine control, previous research provided some quantitative estimates of biodiversity benefits which were incorporated.

In some instances, there are also non-quantified costs such as loss of carbon sequestration and potential soil erosion.

The key outcomes derived from the quantitative analysis of benefits and costs are shown in Table 31 below. Benefits exceed costs in most cases when the planned intervention is compared with doing nothing. Where the quantified figures give a negative net benefit, the 'dollar value per hectare' necessary for a net positive outcome to occur has been put

forward (see column E of Table 31). In Otago Regional Council ORC's opinion, these per hectare values are likely to be met, if not exceeded, when the non-quantified benefits are considered. These instances are discussed further below.

### **9.2.1 Summary of cost benefit analysis**

Table 31 provides an overview of the 'intensity level of analysis' undertaken (see Appendix B of the CBA Report), the alternative objectives considered, the plan objective proposed for each pest or groups of pests, the net benefit outcomes compared against a 'Do Nothing scenario', and the required non-quantified value (where applicable). The intensity level (Column B: 1 = low, 2 = medium and 3 = high in the) of the analysis is determined by:

- a. — the level of uncertainty of the impacts of the subject, or an organism being spread by the subject, or of the effectiveness of measures; and*
- b. — the likely significance of the subject, or an organism being spread by the subject, or of the proposed measures, in terms of stakeholder interest and contention, and the total costs of the proposed plan; and*
- c. — the likely costs of the programme relative to the likely benefits; and*
- d. — the level of certainty and the quality of the available data.*

The benefits and costs are shown and analysed in the table below.

**Table 31: Types and analysis of costs and benefits**

Analytical outcomes					
Pest	A Intensity Level of Analysis	B Objectives considered	C Proposed Objectives and reasons	D Risk-Adjusted Net Benefit of Proposed Objective (NPV6% \$m)	E Biodiversity or other benefits needed for plan to be positive (\$/ha NPV)
Bennetts wallabies	2	Do nothing Eradication Sustained control (3 levels)	<u>Eradication</u> Provides the highest net return.	<del>\$26</del> – <del>\$97</del>	
Rabbits (feral)	2	Do nothing Sustained control (2 levels)	<del>Sustained Control.</del>	<del>\$158</del>	
Rooks	4	Do nothing Eradication	<u>Eradication</u> The net return is positive.	<del>\$0.36</del> – <del>\$0.68</del>	
African love grass	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return.	<del>\$18.4</del>	
Bomarea	4	Do nothing Eradication Progressive containment Sustained control	<del>Progressive Containment</del> Provides the highest net return.	<del>\$27.9</del>	
Boneseed	4	Do nothing	<u>Progressive Containment</u>	<del>-\$0.43</del>	\$370/ha

		Eradication Progressive containment Sustained control	Net return is positive if biodiversity protection is taken into account.		
Broom	2	Do nothing Eradication Progressive containment Sustained control	<u>Sustained Control</u> Provides the highest net return.	\$59.3	
Bur daisy	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return.	\$1.7	
Cape ivy	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return.	\$4.9	
Gerse	2	Do nothing Eradication Progressive containment Sustained control	<u>Sustained Control</u> Provides the highest net return.	\$59.3	
Lagarosiphon	4	Do nothing Eradication Progressive containment Sustained control	<u>Site led</u> While sustained control provides the highest net return, provided biodiversity values are taken into account, occupier agreement at each site means that the returns are assumed to be positive for the management proposed.	<del>-\$42.98</del> <del>-\$423.47</del>	\$19000-82000/ha

Nassella tussock	2	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> While sustained control provides a higher net return, progressive containment can match it with very high levels of achievement.	\$112	
Nodding thistle	2	Do nothing Eradication Progressive containment Sustained control	<u>Sustained Control</u> Provides the highest net return.	\$1.6	
Old man's beard	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return.	\$10.2	
Perennial nettle	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return.	\$8.3	
Ragwort	2	Do nothing Eradication Progressive containment Sustained control	<u>Sustained Control</u> Provides the highest net return provided the assumptions are correct.	\$76.5	
Spartina	4	Do nothing Eradication Progressive containment Sustained control	<u>Progressive Containment</u> Provides the highest net return if the assigned biodiversity value is held to be true.	-\$5.6	\$8630



Spiny broom	4	Do nothing Eradication Progressive containment Sustained control	<u>Eradication</u> Provides the highest net return.	\$12.8	
White-edged nightshade	4	Do nothing Eradication Progressive containment Sustained control	Progressive Containment Provides the highest net return provided the assumptions are correct.	\$0.05	
Wild Russell lupin	4	Do nothing Sustained control	Sustained Control Provides positive net return if biodiversity values are held to be true.	Undefined	Must exceed \$160000 <u>\$270,000 - \$820,000</u> for the region plus control costs
Wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch	3	Do nothing Eradication Progressive containment Sustained control	Progressive containment (with a site-led approach). Preferred over sustained control due to long term benefits, non-monetised benefits and widespread community support, including landholder agreement in targeted sites.	\$226	
Site-led pests (excluding lagarosiphon)	4	Do nothing Site-Led	Site-Led Likely to be positive assuming landholder agreement.	Likely to be positive	
Exclusion pests	4	Do nothing Exclusion	Exclusion Likely to be positive.	Likely to be positive	

Adapted from Table 1 Summary of cost benefit outcomes and funding recommendations – *Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits (2018)*.

### **9.2.2 Pests with a negative risk adjusted quantified net benefit**

Boneseed, lagarosiphon, wild Russell lupin and spartina are in the Proposal because they pose significant threats to non-production values and pose little threat to production. Controlling these species will have biodiversity, recreation and amenity related benefits. The threshold value of \$370 per hectare for boneseed, \$19,000-\$82,000 per hectare for lagarosiphon and \$8,630 per hectare for spartina of land affected would need to be attributed to those other benefits in order for the plan to produce a positive outcome. Benefits from controlling wild Russell lupin are difficult to quantify because costs and benefits remain largely unknown. However, the costs associated with the proposed programme (\$160,000-\$270,000 – \$820,000 NPV at 6%) is considered worthwhile given the likely biodiversity benefits arising from control. The Otago Regional Council (ORC) considers this threshold to be a fair investment in protecting the non-production values attributable to the control of boneseed, lagarosiphon, wild Russell lupin and spartina.

### **9.2.3 Site-led programmes**

Four site-led programmes support and build on the significant momentum and collaboration being achieved by a number of occupiers and wider community interest groups. The three site-led programmes in Dunedin are interrelated projects to reduce the impact of harmful organisms on indigenous biodiversity. Not-for-profit groups have worked on the Peninsula for more than 10 years to protect the indigenous flora and fauna that call the Peninsula home. In collaboration with local and central Government agencies, many residents are now part of coordinated efforts to manage predator pests and plant pests.

The Otago Peninsula site-led programme will support existing efforts to protect the important biodiversity values on the Peninsula. The West Harbour Mt. Cargill site-led programme supports and builds on the significant momentum of the Orokonui Halo Project, a collaboration between the Landscape Connections Trust, OSPRI and Otago Natural History Trust. Quarantine Island / Kamau Taurua and Goat Island / Rakiki are located in the Otago Harbour. These islands provide stepping stones for bird species, but also for rat species and mustelids to move from one side of the harbour to the other by either swimming or on-board small boats/kayaks.

The site-led programme for lagarosiphon builds on the collaborative lagarosiphon management projects led by LINZ and supported by other key parties. They focus on control works in Lake Dunstan to keep important recreation areas clear, its extent is reduced in Lake Wanaka and the Kawarau River over time, and it is kept out of Lake Wakatipu. ORC will continue to support these programmes and advocate to LINZ for long-term suppression of lagarosiphon in Otago and, over time, eradication in key areas.

Expenditure at any single site will be limited and the programme will only be undertaken where feasible and in conjunction with the land occupier. With such agreement from the land occupier it signals that for them the benefits of the programme are likely to exceed the costs they will incur. Likewise, the ORC considers that the benefits to the ORC and the wider community of the site-led programme exceed the costs and the requirements of Section 6 of the NPD will have been met.

#### 9.2.4 Good neighbour rules

In addition to considering the benefits and costs of controlling a pest under a pest management programme, Section 8 of the NPD must also be considered where a good neighbour rule (GNR) is proposed for a pest. This Section requires that the:

- Pest would spread onto adjacent land;
- That the pest would cause unreasonable costs for the adjacent occupier;
- The adjacent occupier is controlling the pest;
- The requirement on the occupier from whence the pest (source) is spreading is not more than is required to prevent the pest spreading; and
- The costs of compliance for the source occupier are reasonable, relative to the cost that the adjacent occupier holder would incur from the pest spreading.

The reasonability test holds for GNR's in most situations. However, exemptions may need to be considered in some situations. Namely:

- For rabbits where the adjacent land exhibits low proneness to rabbit infestation;
- For old man's beard where the infestation is heavy;
- For broom, gorse and wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch where the infestation on the source land is heavy; and
- For ragwort where the land use on the adjacent land does not involve cattle.

#### What constitutes 'reasonable measures'?

The NPD requires a GNR to consider whether the owner or occupier of nearby or adjacent land is taking 'reasonable measures' to manage a pest or its impacts.

If the occupier of nearby or adjacent land is not taking 'reasonable measures' to protect from the pests or its impacts, this is taken as an indication the pest is unlikely to be affecting their use of the land, and the threat of pests from a nearby or adjacent property is unlikely to be causing them 'unreasonable costs'.

What measures are 'reasonable' will differ depending on the nature and threat of the pest, and the uses and values of the land.

The NPD outlines some general principles for defining what 'reasonable measures' are. In some cases, the 'reasonable measures' may be the measures sufficient to comply with obligations in another rule in the regional pest management plan.

In other cases, the measures considered reasonable will depend on whether land is currently present on the property.

If the pest is not currently present on the neighbour's land, the measures might include regular monitoring adequate for detecting the pest, and the intent and ability to control the pest if detected.

If the pest is present, the occupier should be managing it or its impacts. What is reasonable will depend on the uses and values of the land.

### 9.3 CONSIDERATION OF EFFECTS

Otago Regional Council considers that implementing the Plan will deliver positive outcomes for the community. The effects of implementing the Plan (in relation to each pest) for the relationship between the culture, traditions, ancestral lands, waters, sites, wāhi tapu and taonga of Kāi Tahu, environment, human health, the enjoyment of the natural environment, economic well-being and the marketing overseas of New Zealand products are described in this section of the Proposal.

#### 9.3.1 Effects on Māori

The Plan is expected to have overall beneficial effects for Māori culture and traditions. Specifically, this Plan will prevent or reduce plant pest infestations, invasion and consequential degradation of wāhi tapu and taonga sites. Destruction of indigenous flora by animal pests will be prevented or reduced.

In the development of this proposal Kāi Tahu ki Otago have identified some specific matters for the Plan to address and additional input from Kāi Tahu ki Otago may be provided by submissions to the Plan.

#### 9.3.2 Effects on the environment

The successful implementation of this Proposal will result in enhanced conservation, production, recreation and aesthetic values in the region by avoiding or minimising the adverse effects that animal and plant pests may have on the environment.

The beneficial effects include mitigating the adverse effects that high levels of rabbits have on native grassland ecosystems and on the soil resource. Preventing the establishment of wallabies is also beneficial given the adverse effects they have on native forests. Likewise, eradicating rooks is beneficial to the production environment.

Detrimental effects are principally associated with the use of herbicides and pesticides where these adversely affect non-target species. With respect to animal pesticides such as 1080 poison, pindone and cyanide, the effect on non-target species such as birds and invertebrates is strongly linked to the choice of bait (for example oats, carrot, pellets, jam), bait quality in the case of carrots, and the timing and location of operations. However, the introduction of rabbit haemorrhagic disease RHD in 1997 has resulted in minimising the use of 1080 and other pesticides for rabbit control.

In some cases, impacts on non-target species will be unavoidable but ORC will use best practice to minimise these effects, for example, by using sound operational procedures, skilled pest operators and requiring adherence to technical standards. On balance, ORC considers the detrimental effects on non-target species from control tactics to be less significant than the benefits to the environment from controlling pests in this Proposal.

Of the technical methods proposed to control animal and plant pests and other organisms to be controlled, the safe and efficient use of toxins and chemicals is of particular interest to the public. Addressing the concerns will occur through implementing the provisions of:

- (a) the Health and Safety at Work Act 2015;
- (b) the Resource Management Act 1991;
- (c) operational plans;
- (d) procedures, manuals and guidelines; and

(e) — the Agricultural Compounds and Veterinary Medicines Act 1997.

Mitigating the adverse effects from plant pests can also benefit native ecosystems as well as production and pastoral environments. In some cases, imprudent removal of gorse and broom could prevent the vegetation succession process from occurring or increase erosion risk on steep land.

The specific effects being avoided or mitigated, on a pest-by-pest basis, are identified in Section 6.

### **9.3.3 Effects on human health**

Some control methods, such as the use of chemicals and toxins, have the potential to adversely affect human health. The methods described above for minimising the risk to the environment also apply to minimising potential effects on human health. Concerns to human health are also addressed by the Hazardous Substances and New Organisms Act 1996. No other significant adverse effects on human health are anticipated.

### **9.3.4 Effects on enjoyment of the environment**

Enjoyment of the environment may be impacted directly and indirectly by the Proposal. The Proposal benefits biodiversity which is appreciated and enjoyed by many people. Some pests, such as wilding conifers, can have very significant visual impacts affecting people's appreciation of the environment.

Control may also affect enjoyment of the environment by negatively impacting on recreational opportunities. Examples include reduced hunting opportunities for rabbits or inhibiting the use of some plants in gardens or areas where they may provide visual or aesthetic amenity.

### **9.3.5 Effects on economic well-being**

The proposal will have a significant impact on economic well-being. The adverse effects on production are described elsewhere in this Proposal and in many instances are the primary reason for intervention. For each pest, the overall benefits (including both production and biodiversity) have been assessed as greater than the costs of control. The CBA Report has assessed that the combined management of all pests in the Proposal would amount to an overall net benefit of \$868.8 Million<sup>6</sup> over the next one hundred years. Full details of the production benefits and costs of control are provided in the CBA Report.

### **9.3.6 Effects on the marketing overseas of New Zealand products**

The control of animal and plant pests will increase agricultural production in some cases. Consequently, this Proposal is expected to have some beneficial effects for the marketing overseas of New Zealand products. The control of plant pests could also further enhance New Zealand's reputation as a "clean green" nation.

In the future, however, there could be increasing concerns from international markets and consumers regarding the use of chemical and biological control. These concerns would largely involve residues and product purity.

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<sup>6</sup> Based on net present value with a discount rate of 6 percent.

## 9.4 BENEFICIARIES AND EXACERBATORS

The extent to which any person benefits or is likely to benefit from a pest management plan depends on the organism to be controlled and the area for which expenditure is being incurred. Beneficiaries include occupiers and the community as a whole. Occupiers may benefit from increased productivity as a result of the effects of the Plan on their own property and from reduced risk of spill-over effects from other properties. The community as a whole may obtain non-producer benefits from the implementation of the Plan.

Non-producer benefits include a reduction in the actual and potential effects of pests on one or more of the following:

- (a) the viability of rare or endangered species or organisms;
- (b) the survival and distribution of indigenous plants or animals;
- (c) the sustainability of natural and developed ecosystems, ecological processes and biological diversity;
- (d) soil resources or water quality;
- (e) human health or enjoyment of the recreational value of the natural environment;
- (f) the relationship of Māori and their culture and traditions with their ancestral lands, waters, sites, wāhi tapu, and taonga;
- (g) New Zealand's international obligations, assurances and reputation; and
- (h) other aspects of the environment including amenity and landscape values.

Spill-over (externality) effects result in costs or benefits to people other than the land occupier on whose property the pests are located. They include the effects of the spread of plant or animal pests onto neighbouring properties and environmental effects that have costs or benefits to the community as a whole. For example, the spread of rabbits or seeds of plants onto neighbouring properties or damage to indigenous biodiversity are spill-over effects. The reduced risk of spill-over occurs because the Plan brings about the control of pests, thereby reducing the risk to neighbouring properties and the risk of non-producer values being affected.

The non-spill-over benefit (producer benefit) that producers receive by way of extra production and lower control costs, when they control pests on their property, occurs regardless of whether a plan is in place.

The extent to which persons contribute to the problems to be resolved by the Plan for each depends on whether their inaction has the potential to result in spill-over effects that cause significant harm to other persons or to the environment generally.

Table 32 below shows two groups of people: those who have been identified as benefiting from controlling pests (beneficiaries); and those who contribute to the pest problem (exacerbators). A full evaluation can be found in the CBA Report<sup>7</sup>

Table 32: Beneficiaries and exacerbators

Pest	Beneficiaries	Exacerbators
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<sup>7</sup> Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits (2018).

Bennett's wallaby, rabbit.	Rural occupiers, who will benefit from economic values being protected. Neighbouring property occupiers, who will benefit from the prevention of spill-over. Regional community, who will benefit through environmental values being protected.	Occupiers who do not undertake control on their properties. Persons who knowingly distribute wallabies or rabbits to new areas.
Rook.	Rural occupiers, who will benefit from economic values being protected.	Occupiers where rooks occur on their properties. Persons who knowingly distribute rooks.
Bur daisy, nassella tussock, nodding thistle, perennial nettle.	Rural occupiers, who will benefit from economic values being protected. Neighbouring property occupiers, who will benefit from the prevention of spill-over.	Occupiers who do not undertake control on their properties. Persons who knowingly distribute any of these plant pests to new areas.
African love grass, broom, gorse, spiny broom, white-edged nightshade.	Rural occupiers, who will benefit from economic values being protected. Neighbouring property occupiers, who will benefit from the prevention of spill-over. Regional community, who will benefit through environmental values being protected.	Occupiers who do not undertake control on their properties. Persons who knowingly distribute any of these plant pests to new areas.
Wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch.	Rural occupiers, who will benefit from economic values being protected. Neighbouring property occupiers, who will benefit from the prevention of spill-over. Regional community, who will benefit through biodiversity, landscape and recreational values being protected.	Occupiers who do not undertake wilding conifer, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch control on their properties. Persons who knowingly distribute wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch to new areas. Occupiers with conifer plantations, shelterbelts or amenity plantings allowing seeds to spill-over from their properties.
Bomarea, boneseed, cape ivy, old man's beard, spartina and wild Russell lupin.	Regional community, who will benefit through environmental values being protected.	Occupiers who do not undertake control on their properties. People who knowingly distribute any of these plant pests to new areas.

African feather grass, Chilean needle grass, false tamarisk, egeria, hornwort, and moth plant.	Regional community, who will benefit through environmental values being protected. Rural occupiers, who will benefit from economic values being protected.	Persons who knowingly bring any of these plant pests into the Otago region. Persons who fail to notify Otago Regional Council of any new infestations.
Banana passionfruit, Chilean flame creeper, Darwin's barberry, feral cat, feral deer, feral goat, feral pig, hedgehog, lagarosiphon, mustelids, possum, rat, sycamore, gunnera and tradescantia (all managed under site led programmes).	Regional community, who will benefit through environmental values being protected at and adjacent to high value sites. Rural occupiers, who will benefit from economic values being protected at or adjacent to high value sites.	Occupiers who do not undertake control at or adjacent to high value sites on their properties. People who knowingly distribute any of these pests to new areas.

## 9.5 9.1 FUNDING SOURCES AND REASONS FOR FUNDING

The Biosecurity Act 1993 and the Local Government (Rating) Act 2002 require that funding is sought from:

- people who have an interest in the Plan;
- those who benefit from the Plan; and
- those who contribute to the pest problem.

Funding must be sought in a way that reflects economic efficiency and equity. Those seeking funds should also target those funding the Plan and the costs of collecting funding.

In general, efficiency is best achieved by targeting costs to those closest to a particular work where those paying can act in respect of those works. If the person deciding has to pay for the results of their action or inaction, they may change their behaviour to minimise costs. Doing so would lead to the least cost outcome for society. But if another person pays those costs, the incentive to change behaviour is minimal. This may lead to a higher cost for society. Efficiency includes close targeting of costs to beneficiaries and to those contributing to the problem (exacerbators). Equity is more difficult to establish, particularly if a "public good" component exists. In general, there are no relevant guidelines available.

Practicality will determine the extent to which different beneficiaries can be targeted. There is generally a point at which the transaction and administrative costs of recovering costs from a smaller group of beneficiaries will exceed the benefits of more closely targeting that group. Alternatively, the mechanisms available may not be able to target a particular group, for example, individual land uses such as dairying. Therefore, a larger aggregate such as all rural land must be used.

The aim of the funding system should be to maximise the efficiency of resource decision-making by participants. There are two ways in which this happens. They are:

- Charging beneficiaries ensures that the decisions on whether an activity is worthwhile are closely related to the benefits received. If the beneficiaries are charged for the activity, but do not perceive the level of benefit that has been ascribed to them, they will act to reduce the charge and therefore the level of the activity. Similarly, where



stakeholders demand more of an activity where they are required to pay, Otago Regional Council ORC can be assured that the level of benefit from the activity exceeds the costs, and that the activity is being undertaken at an appropriate level.

- Charging exacerbators ensures that where a management action causes problems for other parties, the costs of those problems are fully integrated into the decision on whether the management activity is worthwhile. For pest management, the land-use decisions by land occupiers affects the level and type of pest problem. By charging those occupiers directly for these effects in a way that encourages them to take account of pest problems in their management, the most efficient resource allocation decisions are made. Ideally this leads to land occupiers seeking the most efficient means of achieving pest management objectives.

A key feature of exacerbator payments, however, is that it only achieves greater efficiency where the incentive exists for land managers to take account of the pest management objective in their decisions. Rating does not achieve this because the land manager experiences the cost regardless of whether they change their management decisions to take account of the objectives. Direct charges in the form of control costs, which reflect the level of contribution to the problem, are therefore preferred.

The funding rationale incorporates the principle that those who fund the Plan should not pay for those measures outlined in Section 5.3 for which they receive no benefit or for which another party would normally consider is its role to fund. For instance, it is inequitable to fund the environmental education component of the Plan from a rate on rural land. The rationale, therefore, adopts an activity-based approach where funding shares are identified by Plan activity. An activity-based approach allows the incremental benefit from specific activities, as opposed to pest management generally, to be assessed.

For cost allocation purposes, Otago Regional Council ORC commissioned a review of the levels of benefit accruing to rural and regional rate paying beneficiaries and exacerbators from the activities undertaken to achieve the objectives in this Proposal. The results form part of the analysis of costs and benefits and are contained in the CBA Report, which also contains guidance on Inspection and Control. The funding formulae for service delivery (e.g. biological control), advocacy and advice (information and publicity), and monitoring, remain largely in accord with those contained in the 2009 Strategy.

There are additional new pests in the proposed Plan compared to the existing Strategy, such as those in the exclusion programme and eradication programmes' pests (for example, Chilean needle grass, moth plant), wild Russell lupin and wilding conifers. There is also a much broader range of species that are targeted for site-led programmes. Adjustments to funding formulae are made accordingly.

The funding formulae for this is set out in the following table.

Table 33 32: Funding formula under the Proposed Plan

Funding formulae	
Rural land owners and/or occupiers %	Regional Community %

African feather grass, Chilean needle grass, false tamarisk, moth plant, <u>egeria</u> , <u>hornwort</u> , spiny broom, spartina		
Inspection and monitoring		100
Education and advocacy		100
Control		100
Bennett's wallaby		
Inspection and monitoring	40	60
Education and advocacy		100
Control	40	60
Rook		
Inspection and monitoring		100
Education and advocacy		100
Control	100	
Bur daisy, gorse, nassella tussock, nodding thistle, perennial nettle, rabbit, ragwort		
Inspection and monitoring	100	
Education and advocacy		100
Control	100	
African love grass, broom, wild Russell lupin		
Inspection and monitoring		
Production	100	
Biodiversity	50	50
Education and advocacy		100
Control		
Production	100	
Biodiversity	50	50
Bomarea, boneseed, cape ivy, old man's beard, wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch		
Inspection and monitoring		100
Education and advocacy		100
Control	100 (prevent spread)	100 (initial control)
White-edged nightshade		
Inspection and monitoring	50	50
Education and advocacy		100
Control		100

Site-led programme pests		
Inspection and monitoring		100
Education and advocacy		100
Control	By agreement	
Other activities		
Enforcement	User payers wherever possible	General rate when it is not possible

The overall level of inspection, monitoring, advice and advocacy is determined by ~~Otago Regional Council~~ ORC independently of the pest problem on any particular property. On the other hand, control will vary with both the pest problem and the occupier's response to it on a particular property. It is important that occupiers bear the full consequences of their actions. This is likely to promote the best or optimal response from the point of view of the community as a whole.

The funding of costs allocated to rural occupiers will be through targeted rates applied to occupiers of rateable rural land. The rating base is land value, which reflects the potential effects of pests on land assets. Land area is an alternative rating base but it is less equitable for larger properties in the region because much of the land is not affected by spill-over of pests from neighbouring properties.

~~Otago Regional Council~~ ORC will continue to negotiate with Crown agencies to secure agreements to assist with the costs of implementing the Plan.

## 9.6 9.2 ANTICIPATED COSTS OF IMPLEMENTING THE PLAN

The anticipated costs of implementing the ~~proposed~~ Plan reflect a best estimate of expenditure levels. Funding levels will be further examined and set during subsequent Long Term Plan and Annual Plan processes. While community funding is mainly sourced from rates, alternative funding sources will be sought by the ~~Otago Regional Council~~ ORC. Such funds will off-set rates or be used as a value-added component in appropriate circumstances.

The funding of the implementation of the ~~proposed~~ Plan is from a region-wide general rate (or targeted rate as applicable), set and assessed under the Local Government (Rating) Act 2002, and in determining this, the ~~Otago Regional Council~~ ORC has had regard to those matters outlined in section 100T of the Biosecurity Act.

Where the implementation of this Plan is to be funded by a targeted rate, the matters outlined in section 100T of the Biosecurity Act will be given specific regard to as part of the Annual Plan or Long Term Plan process.

It is anticipated that the estimated annual cost to the ORC for implementing the Plan will be ~~\$1,857,000.~~ \$1,897,000.

The costs listed in Table 26 are likely to rise in line with the New Zealand Consumers Price Index each year.

The costs in Table 26 are for implementing the programmes in the Plan. Additional costs will be incurred for implementing programmes in the Biosecurity Strategy and in establishing surveillance programmes for Organisms of Interest.

New incursions or unforeseen range expansions may require further funding. Any additional budget required will be outlined at the time any new incursion occurs.

Any changes to the anticipated costs listed above will be documented through the future Annual Plan process(s) and will not be updated in the Plan.

#### 9.7 9.3 FUNDING LIMITATIONS

There are no unusual administrative problems or costs expected in relation to recovering costs from any of the persons who are required to pay. It is recognised that there may be a need to recover enforcement costs for some exacerbators through the courts. In some cases, for example where not all exacerbators can be identified, full cost recovery will not be realised and a rating contribution will be required.

## Glossary

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<b>Act</b>	means the Biosecurity Act 1993, including any accompanying amendments and regulations.
<b>Adjacent</b>	means, for the purpose of this Plan, a property that is next to, or adjoining, another property.
<b>Artificial watercourse</b>	means a watercourse that is created by human action. It includes an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal channel. It does not include artificial swales, kerb and channelling or other watercourses designed to convey stormwater.
<b>Authorised Person</b>	has the same meaning as in the Biosecurity Act 1993: " <i>a person for the time being appointed an authorised person under section 103 of this Act.</i> "
<b>Bed</b>	means: <ol style="list-style-type: none"><li>in relation to any river, the space of land which the waters of the river cover at its fullest flow without overtopping its banks;</li><li>in relation to any lake, except a lake controlled by artificial means, the space of land which the waters of the lake cover at its highest level without exceeding its margin;</li><li>in relation to any lake controlled by artificial means, the space of land which the waters of the lake cover at its maximum permitted operating level; and</li><li>in relation to the sea, the submarine areas covered by the internal waters and the territorial sea.</li></ol>
<b>Benefits</b>	includes benefits of any kind, whether monetary or non-monetary.
<b>Beneficiaries</b>	means the receivers of benefits accruing from the implementation of a pest management measure or plan.
<b>Biodiversity</b>	means the variability among living organisms from all sources including, among other things, terrestrial, marine, and other aquatic ecosystems, and the ecological complexes of which they are part. This includes diversity within species, between species, and of ecosystems.

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<b>Biological Control</b>	means the introduction and establishment of natural enemies that will prey on or adversely affect a pest or other organisms to be controlled.
<b>Braided river</b>	means any river with multiple, successively divergent and rejoining channels separated by gravel islands.
<b>Capital Value</b>	has the same meaning as in the Rating Valuations Act 1998: <i>“capital value of land means, subject to sections 20 and 21, the sum that the owner's estate or interest in the land, if unencumbered by any mortgage or other charge, might be expected to realise at the time of valuation if offered for sale on such reasonable terms and conditions as a bona fide seller might be expected to require.”</i>
<b>Consultation</b>	the communication of a genuine invitation to give advice and a genuine consideration of that advice.
<b>Containment area</b>	an area of pest infestation managed differently from the rest of Otago.
<b>the Council</b>	Otago Regional Council or ‘ORC’
<b>Crown</b>	means the New Zealand Government.
<b>Costs</b>	includes costs of any kind, whether monetary or non-monetary.
<b>Destroy</b>	means pull, breakdown, demolish, make useless, kill, cause to cease to exist.
<b>Direction</b>	in relation to Part 6 powers under the Act means a notice issued in accordance with section 122 of the Biosecurity Act 1993 requesting a person or land occupier to carry out certain work or measures.
<b>Distribute</b>	means to transport or in any way spread a pest.
<b>Ecosystem</b>	means a dynamic complex of plant, animal and micro-organism communities and their non-living environment, interacting as a functioning unit.
<b>Effect</b>	has the same meaning as in the Biosecurity Act 1993, unless the context otherwise requires, and: <ul style="list-style-type: none"> <li>a. includes the following, regardless of scale, intensity, duration, or frequency: <ul style="list-style-type: none"> <li>i. a positive or adverse effect; and</li> <li>ii. a temporary or permanent effect; and</li> <li>iii. a past, present, or future effect; and</li> <li>iv. a cumulative effect that arises over time or in combination with other effects; and</li> </ul> </li> <li>b. also includes the following: <ul style="list-style-type: none"> <li>i. a potential effect of high probability; and</li> <li>ii. a potential effect of low probability that has a high potential impact</li> </ul> </li> </ul>
<b>Environment</b>	has the same meaning as in the Biosecurity Act 1993: <i>“includes—</i> <ul style="list-style-type: none"> <li>a. <i>Ecosystems and their constituent parts, including people and their communities; and</i></li> </ul>

	<p>b. All natural and physical resources; and</p> <p>c. Amenity values; and</p> <p>d. The aesthetic, cultural, economic, and social conditions that affect or are affected by any matter referred to in paragraphs (a) to (c) of this definition.”</p>
<b>Environmental values</b>	means the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga.
<b>Exacerbator</b>	means the person aggravating or contributing to a particular pest management problem by action or inaction.
<b>Feral</b>	means wild or otherwise unmanaged.
<b>Feral cat</b>	<u>Means a cat that is wild or otherwise unmanaged. Feral cats are not reliant directly on human activities for survival</u>
<b>Forest species</b>	<u>means a tree species capable of reaching at least 5 metres in height at maturity where it is located.</u>
<b>Forest plantation <u>OR</u> <u>Plantation Forest</u></b>	means a forest deliberately established for commercial purposes, being at least 1ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted.
<b>Goods</b>	is defined under the Act as any personal property.
<b>Good Neighbour Rule</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p><i>"means a rule to which the following apply:</i></p> <p>a. <i>it applies to an occupier of land and to a pest or pest agent that is present on the land; and</i></p> <p>b. <i>it seeks to manage the spread of a pest that would cause costs to occupiers of land that is adjacent or nearby; and</i></p> <p>c. <i>it is identified in a regional pest management plan as a good neighbour rule; and</i></p> <p>d. <i>it complies with the directions in the national policy direction relating to the setting of good neighbour rules."</i></p>
<b>Habitat</b>	means the place or type of site where an organism or population normally occurs.
<b>Harmful organisms</b>	means organisms that have not been declared ‘pests’ for the purposes of this Plan because, although they may have significant adverse effects, regulatory responses are not considered appropriate or necessary.
<b>Indigenous</b>	a native of New Zealand.
<b>Kāi Tahu</b>	descendants of Tahu, the tribe, <del>tangata whenua of Otago</del> , <u>who maintain manawhenua within Otago and much of Te Waipounamu, the South Island.</u>
<b><u>Kāi Tahu ki Otago</u></b>	<u>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>

<b>Lag phase</b>	the period of relative inactivity between the introduction of a species, and the commencement of that species' exponential spread.
<b>Mahika Kai</b>	places where food is produced or procured.
<b>Landowner</b>	has the same meaning as occupier in the Biosecurity Act 1993: <i>"occupier,—</i> <i>a. In relation to any place physically occupied by any person, means that person; and</i> <i>b. In relation to any other place, means the owner of the place; and</i> <i>c. In relation to any place, includes any agent, employee, or other person, acting or apparently acting in the general management or control of the place."</i>
<b>Management Agency</b>	<del>management agency means the Otago Regional Council, the agency given the task of implementing the Strategy Plan</del> or has the same meaning as in the Biosecurity Act 1993: <del>"the Department, authority, or body corporate specified in a pest management strategy as the agency given the task of implementing the strategy."</del> <u>"means the body specified as the management agency in a pest management plan or a pathway management plan".</u> For the purposes of this document, Otago Regional Council is the management agency for pests and other organisms to be controlled in the Otago Region.
<b>Manawhenua</b>	Those with rangatiratanga (chieftainship or authority) for a particular area of land or district.
<b>Modified McLean Scale</b>	This scale assesses rabbit population levels.
<b>Monitoring</b>	in relation to a pest or other organisms to be controlled means to observe and measure the occurrence or non-occurrence of a pest or other organisms to be controlled.
<b>National Policy Direction</b>	in respect of this Plan, means the currently operative National Policy Direction for Pest Management.
<b>Net Present Value (NPV)</b>	<del>means the difference between the total benefits in present day terms and the total costs in present day terms at a specified discount rate.</del>
<b>Non braided river</b>	means a continually or intermittently flowing body of fresh water that is not a braided river; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).
<b>Occupier</b>	has the same meaning as in the Biosecurity Act 1993: <i>"a. In relation to any place physically occupied by any person, means that person; and</i> <i>b. In relation to any other place, means the owner of the place; and</i>



	<p>c. <i>In relation to any place, includes any agent, employee, or other person, acting or apparently acting in the general management or control of the place.</i>”</p>
<b>Operational Plan</b>	means a plan prepared by the Management Agency under Section 100B of the Act.
<b>Organism</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p>“a. <i>Does not include a human being or a genetic structure derived from a human being:</i></p> <p>b. <i>Includes a micro-organism:</i></p> <p>c. <i>Subject to paragraph (a) of this definition, includes a genetic structure that is capable of replicating itself (whether that structure comprises all or only part of an entity, and whether it comprises all or only part of the total genetic structure of an entity):</i></p> <p>d. <i>Includes an entity (other than a human being) declared by the Governor-General by Order in Council to be an organism for the purposes of this Act:</i></p> <p>e. <i>Includes a reproductive cell or developmental stage of an organism:</i></p> <p>f. <i>Includes any particle that is a prion.</i>”</p>
<b>Person</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p>“<i>includes the Crown, a corporation sole, and a body of persons (whether corporate or unincorporate).</i>”</p>
<b>Pest</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p>“<i>an organism specified as a pest in a pest management plan.</i>”</p>
<b>Pest agent</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p>“<i>in relation to any pest, means any organism capable of—</i></p> <p>a. <i>helping the pest replicate, spread, or survive; or</i></p> <p>b. <i>interfering with the management of the pest</i>”</p>
<b><u>Pest agent conifer</u></b>	<u>means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.</u>
<b>Pest Management Plan</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p>“<i>a plan, made under Part 5 of this Act, for the management or eradication of a particular pest or pests.</i>”</p>
<b>Plant</b>	means any plant, tree, shrub, herb, flower, nursery stock, culture, vegetable, or other vegetation; and also includes fruit, seed, spore and portion or product of any plant; and also includes all aquatic plants.
<b>Principal Officer</b>	<p>The principal administrative officer of a regional council; and</p> <p>a. In relation to a regional council, means the principal officer of that council; and</p> <p>b. In relation to a region, means the principal officer of the region's regional council; and includes an acting principal officer; and</p>

	c. In relation to the Otago Regional Council, means the Chief Executive Officer; and includes an acting Chief Executive Officer.
<b>Propagation</b>	means to multiply or reproduce by sowing, grafting, breeding or any other way.
<b>River</b>	means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).
<b>Rule</b>	means a rule included in a pest management plan in accordance with section 73(5) of the Biosecurity Act 1993.
<b>Rural Zoned Land</b>	means land zoned for rural use under any territorial district plan applicable within the Otago Region. This includes rural residential and lifestyle zones but excludes large lot residential.
<b>Sale</b>	includes bartering; offering for sale; exposing, or attempting to sell; or having in possession for sale; or sending or delivery for sale; causing or allowing to be sold, offered, or exposed for sale; and also includes any disposal whether for valuable consideration or not. "Sell" has a corresponding meaning.
<b>Unwanted organism</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p><i>"means any organism that a chief technical officer believes is capable or potentially capable of causing unwanted harm to any natural and physical resources or human health; and</i></p> <p><i>a. includes—</i></p> <ul style="list-style-type: none"> <li><i>i. any new organism, if the Authority has declined approval to import that organism; and</i></li> <li><i>ii. any organism specified in Schedule 2 of the Hazardous Substances and New Organisms Act 1996; but</i></li> </ul> <p><i>b. does not include any organism approved for importation under the Hazardous Substances and New Organisms Act 1996, unless—</i></p> <ul style="list-style-type: none"> <li><i>i. the organism is an organism which has escaped from a containment facility; or</i></li> <li><i>ii. a chief technical officer, after consulting the Authority and taking into account any comments made by the Authority concerning the organism, believes that the organism is capable or potentially capable of causing unwanted harm to any natural and physical resources or human health"</i> </li></ul>
<b>Water body</b>	means fresh water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area.
<b>Wilding conifer</b>	Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees. This also excludes existing planted conifers of less than 1ha, such as windbreaks and shelterbelts at March 2019.

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**Wild Russell lupin**

Wild Russell lupins are Russell lupins that are established by natural means.

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# Appendices

## APPENDIX 1 ORGANISMS OF INTEREST

Common name	Scientific name
<b>Plants</b>	
Blackberry	<i>Rubus fruticosus</i>
Boxthorn	<i>Lycium ferocissimum</i>
Briar	<i>Rosa rubiginosa</i>
Buddleia	<i>Buddleja davidii</i>
Burdock	<i>Arctium minus</i>
Convolvulus	<i>Convolvulus arvensis</i>
Cotoneaster	<i>Cotoneaster</i> spp.
Cotton thistle	<i>Onopordum acanthium</i>
<u>Egeria</u>	<del><i>Egeria densa</i></del>
Giant hogweed	<i>Heracleum mantegazzianum</i>
<u>Heath rush</u>	<u><i>Juncus squarrosus</i></u>
Hieracium (hawkweed)	<i>Hieracium</i> spp.
Horehound	<i>Marrubium vulgare</i>
Hawthorne	<i>Crataegus monogyna</i>
Japanese honeysuckle	<i>Lonicera japonica</i>
<u>Japanese knotweed</u>	<u><i>Fallopia japonica</i></u>
Lake snow	<i>Lindavia intermedia</i>
Periwinkle	<i>Vinca major</i>
<u>Purple loosetrife</u>	<u><i>Lythrum salicaria</i></u>

Reed sweetgrass	<i>Glyceria maxima</i>
Rowan	<i>Sorbus aucuparia</i>
Saltmarsh rush	<i>Juncus geraldii-gerardii</i>
<u>Spanish heath</u>	<u><i>Erica lusitanica</i></u>
Thyme	<i>Thymus vulgaris</i>
<u>Tree Lupin</u>	<u><i>Lupinus arboretums</i></u>
<u>Veldt grass</u>	<u><i>Ehrharta erecta</i></u>
Wild ginger	<i>Hedychium gardnerianum</i>
Willow	<i>Salix</i> spp.
<u>Yellow bristle grass</u>	<u><i>Setaria pumila</i></u>

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### **Animals**

Goose	
Canada	<i>Branta canadensis</i>
White/domestic	<i>Anser</i> spp.
Wasp	<i>Vespula</i> spp.
Mouse	<i>Mus musculus</i>

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### **Marine**

Asian paddle crab	<i>Charybdis japonica</i>
Mediterranean fanworm	<i>Sabella spallanzanii</i>
Sea couch	<i>Agropyron pungens</i>
Sea squirts	<i>Styela clava</i> , <i>Eudistoma elongatum</i> , <i>Pyura doppelgangera</i> and <i>Didemnum vexillum</i>
Undaria	<i>Undaria pinnatifida</i>

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### **Freshwater**

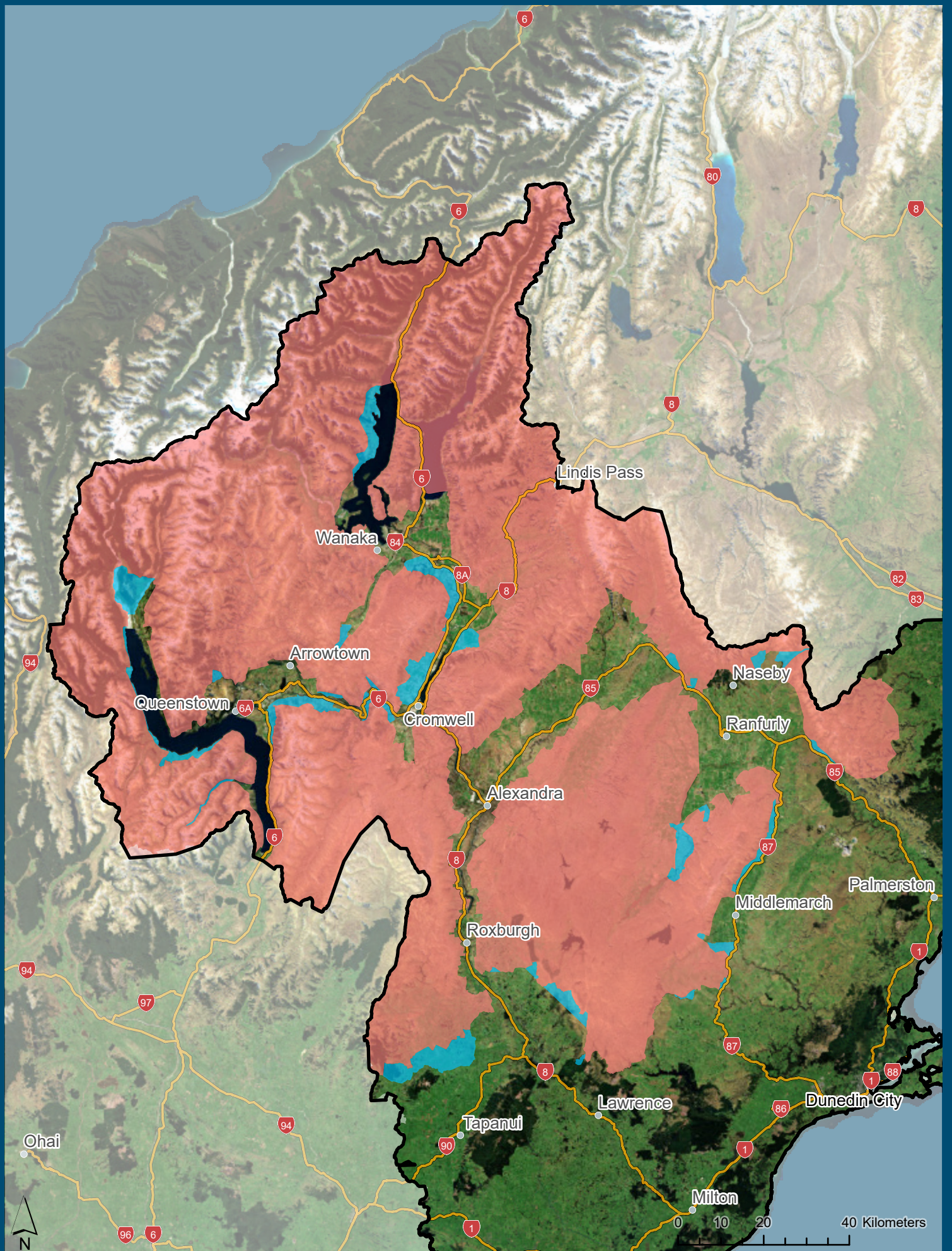
<u>Goldfish</u>	<u><i>Carassius auratus</i></u>
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## **APPENDIX 2 MODIFIED MCLEAN SCALE**

This scale assesses rabbit population levels.

1. No sign found. No rabbits seen.
2. Very infrequent sign present. Unlikely to see rabbits.
3. Odd rabbits seen; sign and some buck heaps showing up. Pellet heaps spaced 10 metres or more apart on average.
4. Pockets of rabbits; sign and fresh burrows very noticeable. Pellet heaps spaced between 5 metres and 10 metres apart on average.
5. Infestation spreading out from heavy pockets. Pellet heaps spaced 5 metres or less apart on average.
6. Sign very frequent with pellet heaps often less than 5 metres apart over the whole area. Rabbits may be seen over the whole area.
7. Sign very frequent with 2-3 pellet heaps often less than 5 metres apart over the whole area. Rabbits may be seen in large numbers over the whole area.
8. Sign very frequent with 3 or more pellet heaps often less than 5 metres apart over the whole area. Rabbits likely to be seen in large numbers over the whole area.

## **APPENDIX 3 MAPS**



Map 2: Gorse and Broom Free Areas

Gorse and Broom Free Areas
  New Gorse and Broom Free Areas







TO PROTECT WHAT WE TREASURE:

# BIOSECURITY STRATEGY

Explanatory note:

Additions are illustrated with underlining. Deletions are illustrated with ~~strikethrough~~.

October 2019 Proposed Biosecurity Strategy for public feedback  
1 November 2018

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# OTAGO REGIONAL COUNCIL BIOSECURITY STRATEGY



<b>Proactive Biosecurity Management</b> Addressing issues before they become significant	<b>Responsive and Flexible</b> Utilise the most efficient and effective methods for control	<b>Integrated and Collaborative Action</b> Working with all parties at all levels	<b>Landscape Scale and Site Scale</b> Target key areas for collaborative and coordinated control
Action 3.1.1 Managing pathways	Action 3.2.1 Administer the Pest Management Plan	Action 3.3.1 National and sub-national initiatives with MPI and others	Action 3.4.1 Provide regional leadership and support for site-led programs
Action 3.1.2 Excluding harmful organisms from Otago	Action 3.2.2 Be flexible in responding to other biosecurity issues	Action 3.3.2 Cooperation and partnerships with local authorities	Action 3.4.2 Advocate and support the continued suppression of lagarosiphon
Action 3.1.3 Eradicating pests from Otago	Action 3.2.3 An 'all of council' approach to biosecurity at Otago Regional Council	Action 3.3.3 Support and work in partnership with Kai Tahu	Action 3.4.3 Other site and landscape scale initiatives
Action 3.1.4 Investing in research and development	Action 3.2.4 Regularly report on biosecurity issues and successes	Action 3.3.4 Support and empower Otago's people and communities	
<ul style="list-style-type: none"> <li>• Biosecurity technical working group</li> <li>• A marine pathway management plan</li> <li>• Landowner led possum control programme</li> <li>• Exclusion pest surveillance programme</li> </ul>	<ul style="list-style-type: none"> <li>• Update Otago Regional Council operating procedures</li> <li>• Guidance on harmful organisms</li> <li>• Transitional programmes in Pest Management Plan</li> <li>• Urban gorse and broom programme</li> <li>• Landowner led rabbit programme</li> </ul>	<ul style="list-style-type: none"> <li>• Support Enviroschools in biosecurity</li> <li>• Promote the eco fund</li> <li>• Volunteer facilitation programme</li> <li>• Shared data platform</li> <li>• National or multi-regional pest management responses</li> </ul>	<ul style="list-style-type: none"> <li>• Contributes to Predator Free Dunedin management plan and develop an Otago Regional Council plan of action</li> <li>• Support Dunedin City Council urban linkages plan</li> <li>• Support groups with site led initiatives</li> </ul>

**PART ONE:  
INTRODUCTION**



*Old Man's Beard*

# 1 INTRODUCTION

## 1.1 PURPOSE AND SCOPE

This strategy sets out the Otago Regional Council’s (ORC) biosecurity approach and prioritises a programme of action for effective biosecurity management across Otago.

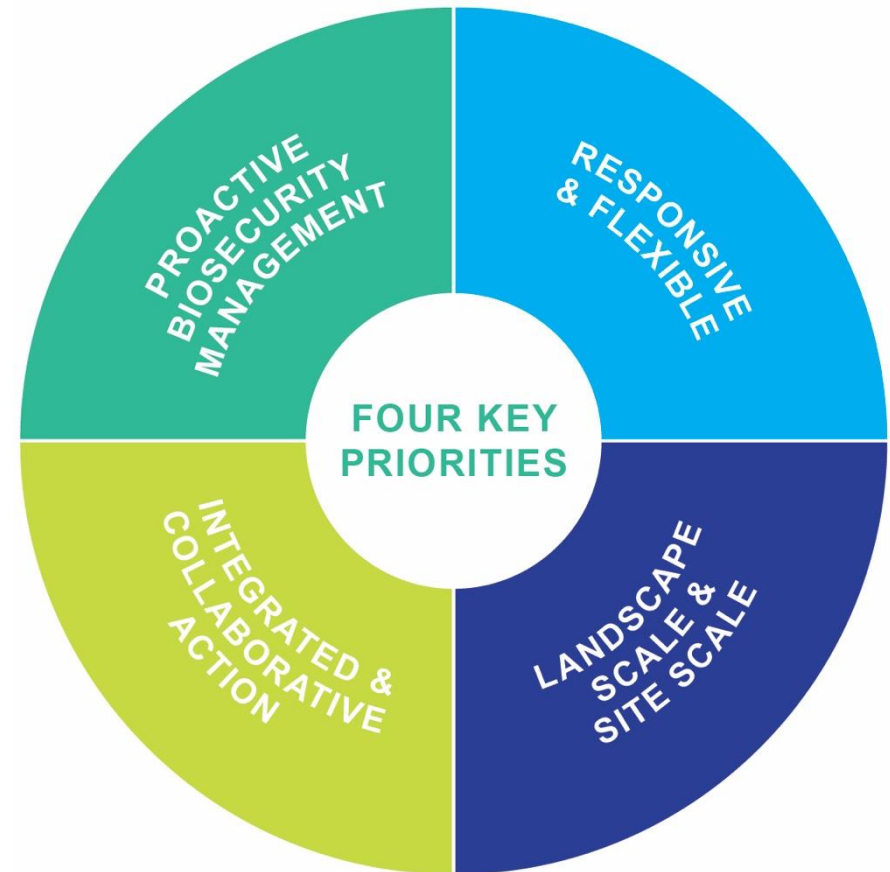
This strategy integrates ORC’s statutory and non-statutory biosecurity functions, including the proposed Regional Pest Management Plan (Pest Management Plan) and all other biosecurity activities such as monitoring and surveillance, research, incursion responses and collaborative action.

The strategy will guide the delivery of ORC’s biosecurity activities over the next 10 years. This includes different measures to protect our environment, economy and communities from the impact of harmful organisms

## 1.2 WHAT WE WANT TO ACHIEVE

### To protect what we treasure from the impacts of harmful organisms

This is an ongoing, long-term goal for biosecurity in Otago. We have set four key priorities that shape how ORC will deliver biosecurity functions over the next 10 years. Each priority has a series of actions that inform how ORC will undertake biosecurity management. An implementation programme then sets out key projects and activities for the first five years of this strategy and requires an annual operation plan be prepared to measure progress.



### 1.3 INTRODUCED SPECIES IN OUR REGION

Otago covers 12% of New Zealand's land area and at about 32,000km<sup>2</sup>, is the second largest region in New Zealand. We have a high level of endemism, a wide range of geography and ecosystems, from alpine regions, glacial lakes, grasslands, forests, and a dramatic coastline.

Agriculture is the basis of Otago's economic development and continues to be a major source of revenue, as does mining and education. Tourism is also a key contributor to the Otago economy and a significant employer in the region. Otago's landscapes and geography are a key attraction to those who visit the region.

Many of New Zealand's introduced species are now harmful organisms in Otago. Some of these were introduced for trades and industries, some by acclimatisation efforts, and others accidentally. Some have only recently arrived. Given our region's reliance on our agricultural and tourism sectors, and our abundant biodiversity, harmful organisms have a major impact on our region.

### 1.4 WHAT THE BIOSECURITY STRATEGY COVERS

#### Harmful organisms

A harmful organism is a plant, animal or other organism that is capable of causing harm to our environment, communities or economy. Not all harmful organisms can or should be managed in Otago's Pest Management Plan, and this strategy identifies how ORC will respond to all organisms that cause us harm. Harmful organisms may be 'pests', 'unwanted organisms' or 'organisms of interest'.



## Pests

The 49 51 pest plants and animals in Otago's Pest Management Plan are legally declared as pests under the Biosecurity Act 1993. This means ORC can set enforceable rules to manage them. The Plan is reviewed every 10 years in accordance with the Biosecurity Act.

## Organisms of interest

As described above, only some harmful organisms in Otago are designated as pests in Otago's Pest Management Plan, however many others present a biosecurity risk. We have compiled a list of organisms that are of interest to Otago and may be candidates for pest status in the future, depending on changes to their distribution or degree of impact, as well as the ability for us to successfully control these species.

## Unwanted organisms

An unwanted organism is an organism declared under the Biosecurity Act 1993 that cannot be sold, propagated, bred, multiplied, communicated, released, caused to be released or otherwise spread. A database of unwanted organisms is administered by the Ministry for Primary Industries. The National Pest Plant Accord and the National Pest Pet Biosecurity Accord are also national registers of organisms that can be managed using the same controls. Unwanted organisms may be controlled at a national, regional or local level.





**PART TWO:  
WHY A  
BIOSECURITY  
STRATEGY?**



## 2 WHY A BIOSECURITY STRATEGY?

### 2.1 BIOSECURITY ISSUES IN OTAGO

This strategy sets out ORC's biosecurity priorities for the Otago region. This includes different measures to protect our environment, economy and communities from the impacts of harmful organisms. This requires a coordinated regional effort if we are to make a difference.

#### Indigenous Biodiversity

Otago is one of the most biodiverse regions in New Zealand. From the albatross/toroa and yellow-eyed penguins/hoiho on the Otago Peninsula, to the endangered skinks/mokomoko of Central Otago and the cheeky kea of the Southern Alps. Not to mention the hundreds of indigenous lizards, birds, freshwater fish, plants, and marine species. Many species in Otago have a high level of endemism, and are found nowhere else on earth.

Our indigenous biodiversity contributes to our health, our economy, and our social and cultural wellbeing. However, what little remains is increasingly threatened by harmful organisms. Species such as rats and stoats predate on our native and often vulnerable or endangered ground-nesting and flightless birds. There are more than 400 weeds of conservation concern in New Zealand. In Otago, invasive plants like old man's beard smother and kill native vegetation if left uncontrolled and destroy vulnerable habitats. This biosecurity strategy seeks to manage the impacts of organisms that harm our environment and works in tandem with ORCs Biodiversity Strategy.

#### **Takata Mana Whenua values**

Kāi Tahu are takata mana whenua of the Otago region. Kāi Tahu means the 'people of Tahu', linking them by name to their common ancestor Tahu Pōtiki. The Kāi Tahu tribal area extends from the sub-Antarctic islands in the south to Te Parinuiowhiti (White Cliffs, Blenheim) in the north and to Kahurangi Point on Te Tai o Poutini (the West Coast). Te Rūnanga o Ngāi Tahu (the iwi authority) comprises 18 papatipu rūnaka, of which four are in Otago. The four Otago rūnaka are Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otakou, and Hokonui Rūnanga.

Harmful terrestrial and aquatic organisms can adversely affect the values of Kāi Tahu and rūnaka. Harmful aquatic species can affect mahika kai and Wai Māori. Kāi Tahu identify the maintenance and enhancement of associations with mahika kai as primary means to realise intergenerational knowledge transfer and thus strengthen cultural identity and well being. Predator species and invasive plant species adversely affect biodiversity that is significant to Kāi Tahu and can impact wāhi tūpuna.

The Kāi Tahu Natural Resources Management Plan 2005 contains a number of issues, objectives and policies regarding the control of biosecurity threats. It also informs Kāi Tahu expectations regarding the nature of participation and consultation in natural resource management matters.

## Economy

Agriculture is the basis of Otago's economy and is a major source of revenue. Tourism now provides more than a quarter of Otago's GDP, the highest proportion for any region. Otago's regional GDP in 2015 was \$10.2 billion, comprising 4.2% of national GDP. Tourism is also a key contributor to the Otago economy and employment, with biodiversity, landscapes, natural resources and geography important for both of these industries.

Otago's regional GDP in 2015 was \$10.2 billion, comprising 4.2% of national GDP. Agriculture is a major source of revenue accounting for \$555 million (5.4%) of GDP (Statistics NZ). Agriculture includes animal farming and crop growing both of which are important for the Otago region. Dairy farming for example covers a total of 91,438 hectares in Otago and accounts for 5.7% of New Zealand's dairy production (New Zealand Dairy Statistics 2017-18, LIC). Tourism now provides more than a quarter of Otago's GDP, the highest proportion for any region (Partially Operative Otago Regional Policy Statement). Tourism and Agriculture are key contributors to the Otago economy and employment with the region's biodiversity, landscapes, natural resources and geography important for both of these industries.

Harmful organisms increasingly have a major impact on Otago's economy. This costs the country billions of dollars in lost revenue and control. For example, pastoral weeds are conservatively estimated to cost the New Zealand economy \$1.2 billion per annum in lost production and control costs. In Otago, production pests such as ragwort can affect stock, and pests such as nodding thistle and nassella tussock can impact production values. Other species such as possums can spread viruses and diseases such as bovine tuberculosis. Wallabies and rabbits are significant

production pests, where ORC invests considerable resource to manage the impacts of spread.

### Case study: Rabbits

Rabbits were originally introduced to New Zealand by European settlers, but shortly spread out of control. They've remained one of the biggest pests in Otago ever since.

Rabbits impact pastoral production, particularly on extensive farming operations. Ten rabbits can eat as much grass as one sheep, and rabbit populations can explode quickly.

Controlling rabbits remains the responsibility of all landowners. Effective management of these pests requires all landowners, large and small, to keep rabbit numbers down on their property.

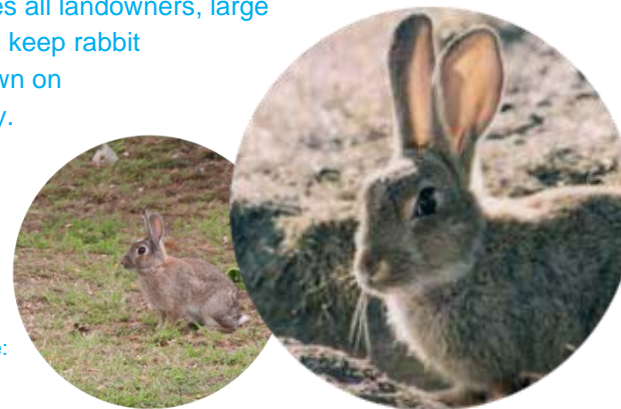


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## Landscape, amenity and recreation

Harmful organisms can reduce the community's enjoyment of natural areas by impacting access and restricting travel. They can destroy wilderness areas, affect our waterways and reduce animal, plant and fish numbers. This can impact the values of our landscapes, adversely affecting visual amenity for Otago's residents and visitors, cultural landscapes and our sense of identity.

Tree species such as wilding conifers can completely transform vast landscapes. Gorse and broom can restrict access to rivers, making it difficult for people fishing and picnicking. Aquatic weeds such as lagarosiphon, didymo and lake snow can impact where we can swim and recreate.

### Case study: Wilding conifers

A national collaborative model has been established to prevent the spread of, and to progressively remove, wilding conifers from certain areas, through the National Wilding Conifer Control Programme which commenced in 2016.

In Otago, this effort has seen nearly 300,000 hectares cleared over ~~the last few years~~ 2016 – 2018 on the back of a partnership effort between ORC, government agencies, local councils, landowners and community groups like the Central Otago Wilding Conifer Control Group and the Wakatipu Wilding Conifer Control Group.

Photo reference: RH: 03



## 2.2 OTAGO REGIONAL COUNCIL'S ROLE IN BIOSECURITY

ORC provides regional leadership to manage biosecurity issues in Otago, working closely with takata mana whenua, communities, central and local government and other key agencies and groups. The legislation and policy instruments that underpin or authorise ORC's biosecurity-related programmes and activities are summarised below.

### The Biosecurity Act 1993

The Biosecurity Act 1993 (the Act) mandates regional councils to provide “...*leadership in activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in New Zealand (pest management) in their region*”. This includes:

- (a) *promoting the alignment of pest management in the region;*
- (b) *facilitating the development and alignment of regional pest management plans and regional pathway management plans in the region;*
- (c) *promoting public support for pest management; and*
- (d) *facilitating communication and co-operation among those involved in pest management to enhance effectiveness, efficiency, and equity of programs (section 12B(2) of the Act).*

The Act is enabling and any regional council involvement in pest management activities is at the Council's discretion. ORC is involved in various national control programmes, including for wilding conifer control, didymo and lake snow.

However, the imposition of any rules or regulatory powers under the Act requires the preparation of a regional pest management plan, pathway management plan or small-scale management programme (pest plans).

The National Policy Direction is a regulation that sets out additional requirements for the development of pest plans. This includes requirements to ensure that they are cost effective (the benefits outweigh the costs), all pest plans align, how to set good neighbour rules and direction on how plans must be prepared.

### Proposed Otago Regional Pest Management Plan

The Pest Management Plan provides a regulatory framework for efficient and effective management or eradication of ~~38~~ 51 animal and plant pest species to reduce the adverse effects of these pests and to maximise the effectiveness of pest management action by providing a regionally coordinated approach. These pests will be managed on a regional or site led basis.

Not all organisms that cause harm are managed by the Pest Management Plan. Some species may already be managed by a different agency or might be better suited to a different management approach, or the costs of managing the organism may outweigh the benefits of doing so.

### Pathway management plans and small-scale management programmes

Pathway management plans set rules to prevent harmful organisms from being transported into new or different areas. There are no regional pathway management plans in Otago. However, these may be developed in the future and could apply on a regional or multi-regional basis. ORC will investigate the potential for pathway plans, including for marine species.

Small-scale management programmes can be utilised for any unwanted organism. To undertake a small-scale programme, ORC must prepare a public notice, and can then immediately undertake direct control without needing to prepare or review a pest plan. Section 100V of the Act sets out these criteria. This includes being satisfied that without action the

organism could cause serious impacts, and that it can be effectively eradicated or controlled within three years.

### Other legislation, plans and strategies

The Local Government Act 2002 (LGA) sets out the statutory purpose of district and regional councils and the Long Term Plan (LTP) process provides a framework for the direction and priorities of each local authority. Through LTPs, councils secure funding for their activities in consultation with their communities. This includes funding for biosecurity activities.

Regional councils also have responsibilities under the Resource Management Act 1991 (RMA) for natural and physical resources. Adverse effects are managed through regional policy statements, regional and district plans, and resource consents. Regional policies and plans can manage activities so that they do not create or exacerbate biosecurity risks. ORC's Regional Policy Statement contains policies and methods to manage biosecurity effects.

### Otago Biodiversity Strategy

ORC has also recently adopted a regional Biodiversity Strategy which outlines actions and programmes that ORC will lead or participate in to achieve improved biodiversity outcomes. The control of harmful organisms makes a significant contribution to biodiversity outcomes. This will be recognised in the implementation of the Biosecurity Strategy and Biodiversity Strategy, by ensuring integrated outcomes are achieved across the two.

## 2.3 THE ROLE OF OTHER AGENCIES

Other agencies and groups also have statutory roles and obligations and undertake action in relation to biosecurity. As part of this strategy, the ORC is seeking not to duplicate the work of other agencies and groups, but rather identify activities and programmes to work collaboratively, provide support and add value where appropriate.



**Central government:** managing risk offshore, developing international standards and rules, trade and bilateral agreements, monitoring emerging risks, setting import health standards.



**Ministry of Primary Industries:** Intercepting biosecurity risks at the border, verifying compliance with the rules. National readiness, surveillance response and management. Department of Conservation and Land Information New Zealand also carry out national and multiregional coordinated control.



**Otago Regional Council:** Eradication, containment and control of pests and diseases within and between regions. This involves participating in national and multiregional initiatives with government ministries/departments, organisations and regional councils.



**Individuals, groups, Territorial Authorities and organisations:** Protecting the places that we value. New actions are identified in this Strategy so that ORC further supports biosecurity initiatives at a local level.

## Ministry for Primary Industries

The Ministry for Primary Industries (MPI) is the Government department charged with leadership of New Zealand's biosecurity system. MPI has the lead role in administering the Biosecurity Act and undertaking pest and disease surveillance. MPI's responsibilities include preventing the introduction and spread of new species to New Zealand. Key MPI policies/plans include The National Policy Direction for Pest Management 2015 (National Policy Direction), the Biosecurity 2025 Direction Statement and the Pest Management National Plan of Action 2010. MPI lead national and sub-national responses to biosecurity incursions.

## The Department of Conservation

The Department of Conservation (DOC) is funded and empowered to manage pests and harmful organisms on public conservation land and is the principal central government agency involved in the conservation of biodiversity. DOC's role is broad and multifaceted, operating under the Conservation Act 1987, the National Parks Act 1980, the Wildlife Act 1953, the Wild Animal Control Act 1977, and the Reserves Act 1977.

DOC's statutory responsibilities include managing public conservation land, freshwater fisheries (including pest freshwater fish under the Freshwater Fisheries Regulations 1983), and the control of wild deer, chamois, thar, goats and pigs under the Wild Animal Control Act 1977. DOC is also required to control pests on land that they occupy or administer in accordance with any good neighbour rules in the Pest Management Plan.

## **The New Zealand Transport Agency**

The Transport Agency is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to

provisions applicable to land occupiers for the purposes of obligations for pest control on road reserves or verges.

## Territorial Authorities

Otago is made up of five territorial authorities: Dunedin City Council, Clutha, Central Otago, Queenstown Lakes and Waitaki District Councils. Waitaki District straddles both the Otago and Canterbury regions.

Each territorial authority manages council reserves and undertakes direct management of harmful organisms impacting on reserves and other council administered land, within that territory. Territorial authorities are also road controlling authorities in their district. They are required to control pests on land that they occupy or administer in accordance with the Pest Management Plan rules.

## KiwiRail

KiwiRail is the Crown agent responsible for managing New Zealand's railway infrastructure. KiwiRail is required to control pests on land that they occupy or administer in accordance with the Pest Management Plan rules.

## Land Information New Zealand

Land Information New Zealand (LINZ) manages over 5,000 properties across New Zealand, totalling almost two million hectares and 8% of New Zealand's land area. These include high country pastoral leases, Crown forest licensed land, former railway properties and the beds of many lakes and rivers. LINZ is responsible for biosecurity on land under its management and works collaboratively with other parties in undertaking its pest control programmes. This includes controlling pests in accordance with any good neighbour rules set out in the Pest Management Plan.

## Predator Free 2050

Predator Free 2050, led nationally by the Predator Free New Zealand Trust, has a goal to rid New Zealand of the most damaging introduced predators that threaten our natural taonga, our economy and primary sector. Ridding New Zealand of possums, rats and stoats by 2050 is a nationwide goal, with new techniques and a co-ordinated effort across communities, iwi, and public and private sectors.

At a local level, predator control initiatives are underway across Otago. This varies from smaller scale projects to large landscape scale initiatives in different areas across the region.

Predator Free Dunedin is a collaboration of 20 stakeholders working together to implement predator free objectives across large landscape scale projects on Otago Peninsula, North Harbour/Mt Cargill and the Dunedin urban area. The Pest Management Plan and this strategy supports the delivery of these predator free objectives and seek to support smaller scale and other landscape scale projects too.

## Groups, industries and individuals

Everyone has responsibilities for pest management. At the individual level, people manage their land to keep it free of weeds and pests, particularly where this benefits them. Everyone is bound by the requirements in the Biosecurity Act for unwanted organisms and private land occupiers are required to control pests in accordance with the Pest Management Plan rules. There are many groups and non-governmental organisations in Otago that also play a key role in biosecurity management by undertaking voluntary management as part of biodiversity projects and site led initiatives.

At an industry level, industries such as OSPRI and Kiwifruit Vine Health, have prepared and are implementing national pest management plans under the Biosecurity Act. Other examples include the Plant Nurseries

Association involvement in the National Pest Plant Accord, and Port Otago's involvement in marine pest surveillance and management.

### Case study: OSPRI

OSPRI is a partnership between the primary industry sector and the government. OSPRI's TBfree programme aims to eradicate bovine tuberculosis affecting stock.

A core component of this is the control of possums. Possums are very susceptible to TB and the disease can spread quickly in them. This makes controlling possum numbers, particularly in areas where TB is prevalent, a key component of OSPRI's work. Infected herds have reduced nationally from over 300 in 2003 to 54 in 2017.

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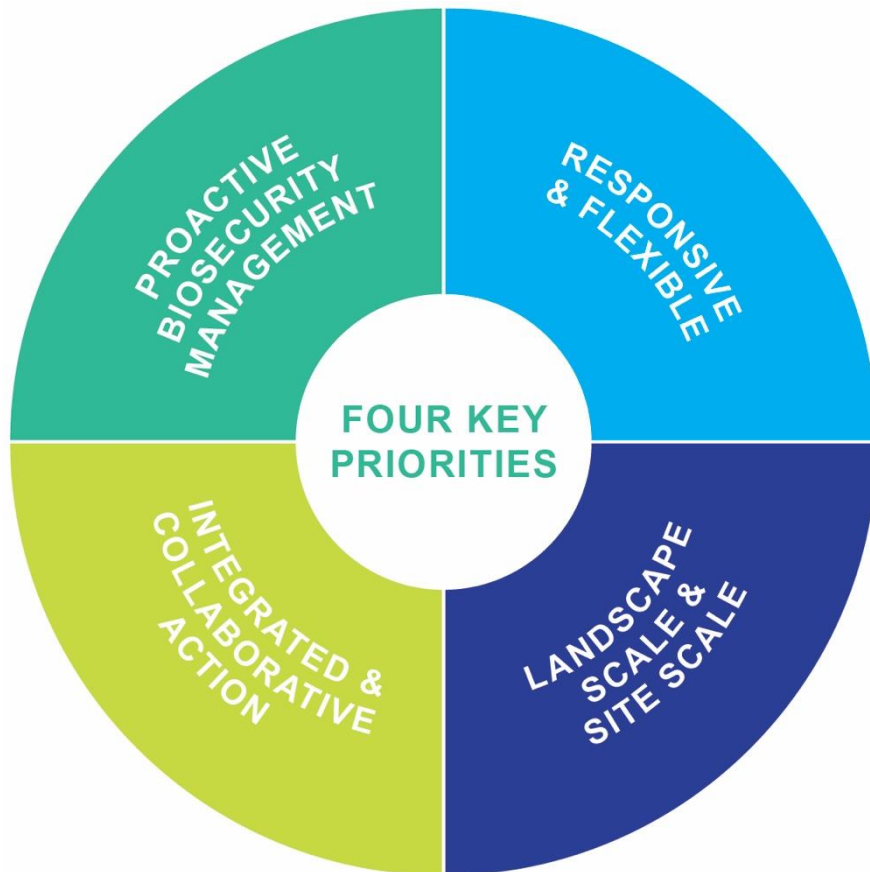
**PART THREE:  
KEY REGIONAL  
PRIORITIES AND  
ACTIONS**

*Darwin's Barberry*



### 3 KEY REGIONAL PRIORITIES AND ACTIONS

To achieve our long-term goal for biosecurity in Otago, four key regional priorities have been identified. Each of the four key priorities have a series of actions that inform how ORC will undertake biosecurity management over the next 10 years.



#### 3.1 PROACTIVE BIOSECURITY MANAGEMENT: ADDRESSING ISSUES BEFORE THEY BECOME SIGNIFICANT

ORC's first key priority is proactive biosecurity management. This means addressing biosecurity issues before they become significant. ORC has a number of management options, and the most appropriate response will depend on the nature of the organism, the potential risk, and the effectiveness of the options available to respond. These actions include:

##### Action 3.1.1 Managing pathways

- **Advocate for the preparation of national and sub-national pathway management plans** where rules are needed to prevent harmful organisms from being transported into new or different areas.
- **Actively advocate for a national marine pathway management plan** to minimise the risk of marine pests being spread throughout the coastal marine area within Otago and between regions.

##### Action 3.1.2 Excluding harmful organisms from Otago

- **Undertake research and surveillance for exclusion pests** in ORC's Pest Management Plan. Where neighbouring councils manage or exclude the same species, work collaboratively on research and surveillance where it is efficient and effective to do so.
- **Undertake risk assessments of other harmful organisms** that are not yet present in Otago but may have the potential to cause significant harm if they were established. As above, collaborate with neighbouring councils where they are also investigating the same species.
- **Utilise the rules and powers in the Pest Management Plan to eliminate incursions** where exclusion pests are discovered in Otago.

- **Utilise the Biosecurity Act to implement small-scale programmes** where an unwanted organism that was not previously present in Otago is now present, and without direct action, the organism could cause serious impacts.

#### Case study: Marine pests in Otago

Otago Harbour is highly valued by the community and a vital transport hub for the region. This means it is also subject to high traffic, which can spread marine pests.

Recent surveys of the Harbour have not identified any 'new-to-New Zealand' pests. However, already established marine pests like clubbed tunicate and Japanese seaweed remain present.

~~In addition to managing these pests, we need to ensure new pests don't become established.~~ ORC is advocating for a national marine pathway management plan to provide a coordinated and effective management approach to marine pest spread.

#### Action 3.1.3 Eradicating pests from Otago

- **Within the 10 year life of the Pest Management Plan, eradicate rooks and spiny broom** from Otago. Once eradicated, update their status in the Pest Management Plan to exclusion species and continue surveillance to prevent any new incursions.
- **Within the 10 year life** of the Pest Management Plan, eradicate possums from Otago Peninsula. Once eradicated, identify new areas for possum eradication.
- **Investigate the potential to eradicate Spartina and one or more of the species** listed in the Pest Management Plan as progressive containment species, once the species above are eradicated.

#### Action 3.1.4 Investing in research and development

- **Monitor the state of the environment**, including the impacts of harmful organisms on biodiversity and water quality.
- **Contribute to and facilitate regional, national and international research** on biological controls for harmful organisms.
- **Prioritise this research to target harmful organisms** that have the greatest threat to the Otago region, and where possible, work collaboratively with other organisations so that research is cost effective to ORC and can be of value to more people.
- **Advocate and educate people and communities on the best technologies available** and new innovations to manage harmful organisms where these provide more efficient, effective, and humane control techniques.

### 3.2 RESPONSIVE AND FLEXIBLE: UTILISE THE MOST EFFICIENT AND EFFECTIVE METHODS TO CONTROL HARMFUL ORGANISMS

ORC's second key priority is to be responsive and flexible in delivering biosecurity outcomes. This means managing harmful organisms in the most efficient and effective way, and ensuring biosecurity outcomes are incorporated into all ORC's strategies, plans, and projects. It also means being adaptable to changing situations and taking a precautionary approach when little is known.

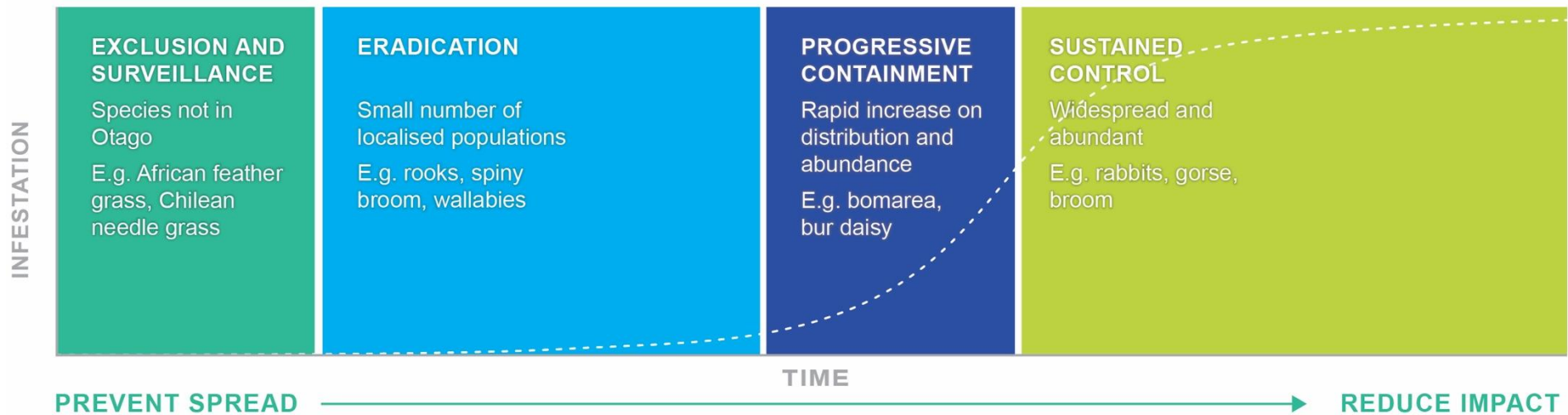
The pest infestation curve is used in New Zealand to help determine the most appropriate management option. The position of a species on the curve directly relates to the cost effectiveness of eradicating or controlling it. The lower the species is on the curve, the more cost effective it is to control. ORC uses this continuum to help decide how to best manage harmful organisms.

#### Case Study: Eradicating rooks from Otago

Rooks can damage cereals, new crops and pasture. Over the last few decades ORC has successfully reduced rook numbers from an estimated 150 birds in 2006 to less than 40 birds today. ORC aims to completely eradicate rooks from Otago within the next 10 years.



Photo reference: 06



### Action 3.2.1 Administer the programmes in the Pest Management Plan

- **Undertake monitoring and surveillance of all pests** in the Pest Management Plan and administer the rules to achieve the Plan's objectives.
- **When administering the rules of the Pest Management Plan, work proactively with landowners and occupiers** to help them understand what rules apply to their land, what their responsibilities are, and give them advice and support on control options.
- **Utilise ORC's Exemption Powers under the Biosecurity Act**, where a flexible approach is required to effectively manage pests in the Pest Management Plan, and where landowners and occupiers meet the criteria set out in section 78 of the Act.

### Action 3.2.2 Be flexible in responding to biosecurity issues outside the Pest Management Plan

- **Support owners and occupiers by providing advice and information** on how to control harmful organisms that are not listed in the Pest Management Plan.
- **Provide additional guidance on the ORC website** about how to manage harmful organisms. This will include information on surveillance and identification, and control measures.
- **Develop internal guidelines for biosecurity staff** to inform the most efficient and effective response to biosecurity issues that arise.
- **Support incursion or management responses by other agencies**, including MPI, LINZ, DOC and other agencies where appropriate.

### Action 3.2.3 Apply an 'all of council' approach to biosecurity at Otago Regional Council

- **Ensure ORC's strategies and plans provide for improved biosecurity outcomes** in objectives, policies, rules and methods.
- **Consider and bolster where possible biosecurity outcomes** when undertaking and implementing ORC works and projects in other areas.
- **Strategically align ORC projects that provide biosecurity benefits** to apply an integrated and multi-level approach, particularly where these relate to site or landscape-scale projects and biodiversity outcomes.

### Action 3.2.4 Regularly report on biosecurity issues and successes

- **ORC will prepare an operational plan** in accordance with section 100B of the Biosecurity Act that sets out how ORC will administer the Pest Management Plan and biosecurity actions over the coming 12 months, and update and report on the plan outcomes on an annual basis.
- **Investigate new ways to share information on biosecurity issues and successes with communities.** This will include investigating how spatial information can be shared, such as monitoring and trapping programmes, and simple innovative ways to report on progress.

### 3.3 INTEGRATED AND COLLABORATIVE ACTION: WORKING WITH ALL PARTIES AT ALL LEVELS

ORC's third key priority is to provide an integrated and collaborative approach in delivering biosecurity outcomes. This means actively advocating for, and participating in, biosecurity initiatives and projects at all levels; from national and sub-national projects, to regional and district partnerships, to supporting and empowering communities and individuals.

#### Case study: Lindis Pass Conservation Group

The Lindis Pass Conservation Group received \$4,713 of ORC funding to go towards tools, protective clothing and a chemical handler certificate to push back and contain invasive sweet brier in Lindis Pass Scenic Reserve. The Lindis Pass Conservation Group is made up of community volunteers who have a passion for the area. Their mission is to enhance and promote the natural conservation, landscape and recreational values of the Lindis Pass. The tools are essential to enable the volunteers to safely and efficiently carry out weed control through cutting and poisoning these clusters of dense, thorned shrubs.



#### Action 3.3.1 Actively advocate for and participate in national and sub-national initiatives with MPI and others

- **Actively advocate for national and sub-national management plans** to control unwanted organisms that require a multi-regional approach to most efficiently and effectively control the species.
- **Participate in other national and sub-national initiatives** to effectively control unwanted organisms that require a consistent and coordinated multi-regional approach.
- **Form collaborative partnerships with neighbouring regional councils** where councils have shared biosecurity goals; particularly where these relate to specific species, or site or landscape-scale projects.

#### Action 3.3.2 Work cooperatively and in partnership with territorial local authorities, DOC, LINZ and other key agencies on initiatives to control harmful organisms

- **Actively advocate for improved biosecurity outcomes in district plans** and strategies to reduce the impacts of harmful organisms within Otago's districts.
- **Work in partnership with territorial local authorities, DOC, LINZ and other key agencies** on biosecurity initiatives where this provides efficient, effective and collaborative outcomes and optimises control.

#### Action 3.3.3 Support and work in partnership with Kāi Tahu on initiatives to control harmful organisms impacting on cultural values

- **Engage with Kai Tāhu regularly on biosecurity issues** to identify where Kai Tāhu may have an interest in biosecurity initiatives and how they wish to be involved.

- **Partner with Kāi Tahu on biosecurity initiatives** to address issues that impact on ~~cultural~~ values of significance to Kai Tāhu.

#### Action 3.3.4 Support and empower Otago's people and communities to control harmful organisms

- **Provide funding and support to people and communities involved in volunteer initiatives** that optimise the control of harmful organisms to provide improved biodiversity, landscape, amenity, cultural and social outcomes.
- **Showcase and celebrate significant case studies and achievements** where communities and groups have provided improved biodiversity, amenity, cultural and social outcomes.
- **Empower individuals and communities** to actively control harmful organisms on their land and in their area by providing education, information, facilitation, support and training.

#### Case study: Otago Peninsula Biodiversity Group

With the help of more than 60 regular volunteers, Otago Peninsula Biodiversity Group (OPBG) have ~~now~~ removed more than 12,500 possums from the Otago Peninsula from 2008 to 2018. OPBG received \$27,000 from ORC in 2018 so they could trial a pest aversion fence on a farm as a future biosecurity tool for managing pest species reinvasions. The funding also went towards analysis of trends, environmental monitoring data for birds, vegetation, and rodents, a base-line survey of lizard species' relative abundance and distribution on the Peninsula, and also contributed to the ongoing inventory of invertebrate species on the Peninsula. OPBG has been working hard for over six years to reduce possum numbers for the benefit of native flora and fauna.

Photo reference: L-R: 07, 08, 09



### 3.4 LANDSCAPE SCALE AND SITE SCALE: TARGET KEY AREAS FOR COLLABORATIVE AND COORDINATED CONTROL

ORC’s final key priority is to provide for collaborative and coordinated biosecurity control in key areas to protect significant environmental, social and recreational values. This means working together with other government agencies, organisations, interested parties and volunteers to better protect our special places from harmful organisms. This also means providing regional leadership and support for these initiatives.

Landscape scale and site scale initiatives can be progressed in several different ways:

Site-led programmes in the Pest Management Plan	How to add new site-led programmes to the Plan	Other site and landscape scale initiatives
For existing larger scale initiatives.	For new and future larger scale initiatives.	For smaller scale initiatives.
ORC has committed to four large scale site-led programmes in the Pest Management Plan.	Appendix 2 sets out how new site-led programmes can be included in the Pest Management Plan.	Further actions also set out how other smaller site and landscape scale initiatives can be developed or supported.

#### Site-Led Programmes in the Pest Management Plan

ORC has committed to four site-led programmes in the Pest Management Plan. The three site-led programmes in Dunedin are interrelated projects

to reduce the impact of harmful organisms on indigenous biodiversity. The site-led programme for lagarosiphon seeks to continue ORC’s support for collaborative lagarosiphon management projects led by LINZ and with input from other key parties.

New site-led programmes in other areas in Otago may be included in the Pest Management Plan over time. The criteria in Appendix 2 sets out how ORC will consider any new site-led programmes.

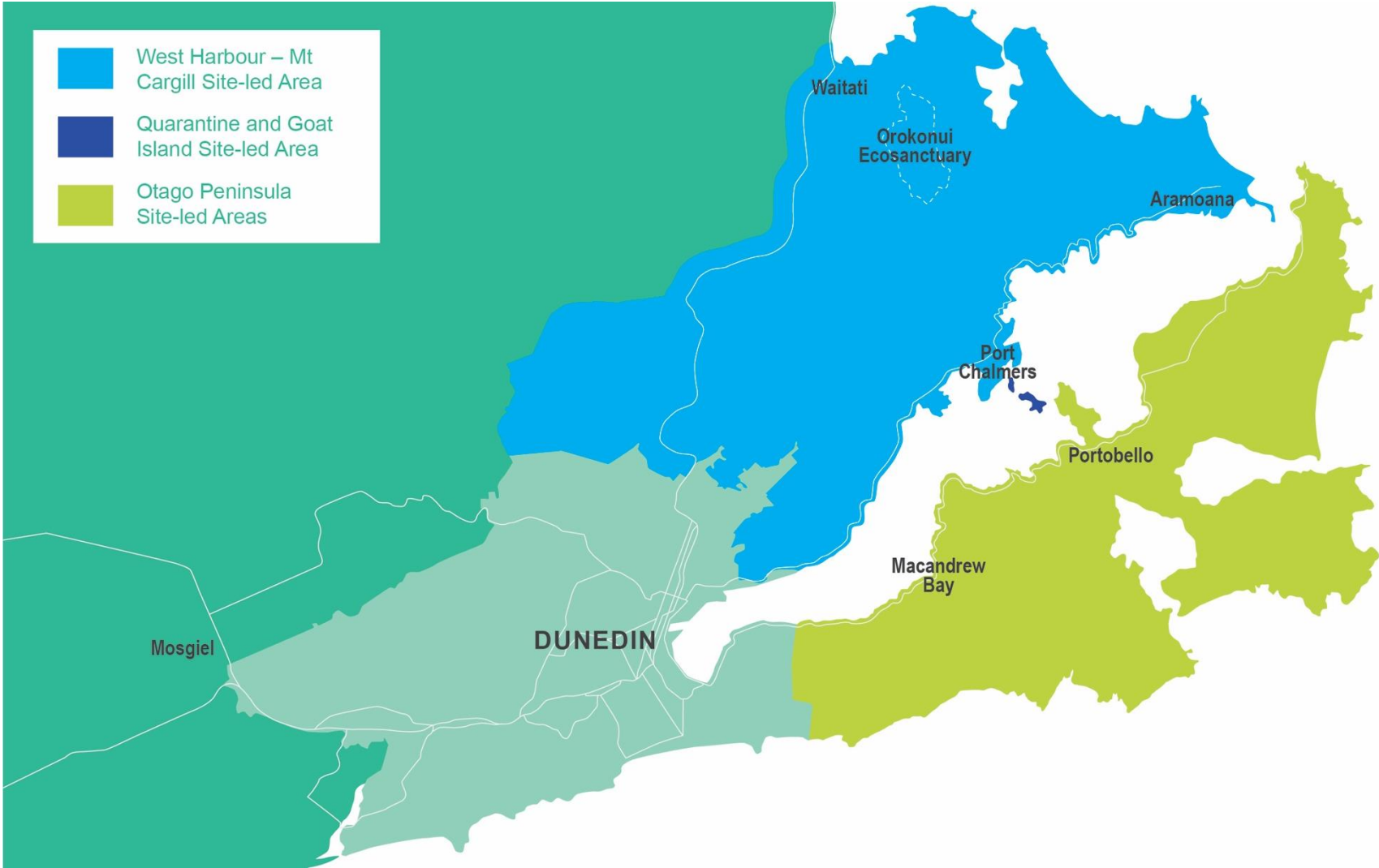
#### The Otago Peninsula

Not-for-profit groups have worked on the Peninsula for more than 10 years to protect indigenous biodiversity that call the Peninsula home. In collaboration with local and central government agencies, many residents are part of coordinated efforts to manage harmful predators and plants.

The Otago Peninsula site-led programme in the Pest Management Plan will support existing efforts to protect the important biodiversity values on the Peninsula. This includes ORC supporting the control of banana passionfruit, Chilean flame creeper, Darwin’s barberry, sycamore, gunnera, tradescantia, Bennett’s wallaby, feral cat, feral deer, feral goat, feral pig, hedgehogs and mustelids, and eradicating possums.

The Otago Peninsula is 9,000ha in area and stretches parallel to the Dunedin mainland. The Peninsula is steep and hilly, with tidal inlets, long sandy beaches, coastal cliffs and many small bays. Small towns are dotted along the western harbour edge. The Ōtākou Marae is located near Harrington Point. The Peninsula’s biodiversity attracts many local, national and international visitors.

# The Otago Peninsula, West Harbour – Mt Cargill and Quarantine and Goat Island Site-led Areas





Tairoa Head at the tip of the Peninsula hosts the only mainland colony of albatross in the world, the endangered northern royal albatross/toroa. The Peninsula is also home to one of the rarest penguins in the world, the endangered yellow-eyed penguin/hoiho. The rare New Zealand sea lion/whakahao has returned to the mainland after being hunted to local extinction by early sealers and has established its first mainland breeding area on the Peninsula's southern beaches. Elephant and fur seals/kekeno are also found there, along with the Otago shag and other endemic shore and seabirds.

The Peninsula's forest remnants are home to populations of some of our smallest birds, including rifleman, brown creeper and tomtit. The Peninsula is also home to five reptile species, including the at-risk jeweled gecko, along with the recently discovered inconspicuous skink and the locally rare and at-risk green skink. The Peninsula is also home to many native invertebrates.

### West Harbour – Mt Cargill

This site-led programme supports and builds on the significant momentum of the Orokonui Halo Project, a collaboration between the Landscape Connections Trust, OSPRI and Otago Natural History Trust. The Orokonui Halo Project is a response to predator pests threatening the Orokonui Ecosanctuary, surrounding indigenous biodiversity, and impacting on local farmers. As threatened bird species within the ecosanctuary flourish and slip over into the surrounding area, they are also put at risk by predator pests outside the sanctuary.

This site-led programme will support the coordinated efforts of the groups and volunteers involved to improve biodiversity and habitats in this area. This includes ORC supporting the management of banana passionfruit, Chilean flame creeper, Darwin's barberry, tradescantia, Bennett's wallaby, feral cat, feral deer, feral goat, feral pig, mustelids, and possums.

The West Harbour – Mt Cargill site-led area covers approximately 12,500ha on the western side of Otago Harbour. The 302ha Orokonui Ecosanctuary is at the core of the project area, and with intensive predator control, acts as the nucleus for the expansion of indigenous wildlife across the site-led area and wider city and hinterland. The site-led area is a mix of beaches and inlets, the harbour edge, small towns like Port Chalmers and Pūrākanui, lifestyle blocks and hobby farms, larger landholdings, forests and native bush.

The area is home to 11 naturally uncommon ecosystem types, including coastal turfs, ephemeral wetlands, volcanic boulder fields, lagoons and estuaries. The area is also home to the endangered yellow-eyed penguin/hoiho, the rare New Zealand sea lion/whakahao, and the New Zealand fur seal/kekeno. There are 11 threatened bird species, including the South Island kaka and the South Island robin, and nine at-risk bird species including the Southern blue penguin and the South Island fernbird. The at-risk jeweled gecko and green skink, and threatened freshwater species are also found here.

### Quarantine Island and Goat Island

Quarantine Island and Goat Island are located in the Otago Harbour. These islands provide stepping stones for bird species, but also for rat species and mustelids to move from one side of the harbour to the other by either swimming or on board small boats/kayaks. The Norway rat and the house mouse are present on Quarantine Island. The key community outcome for the island is to eradicate rats, and to ensure that the island remains free from other pest animals.

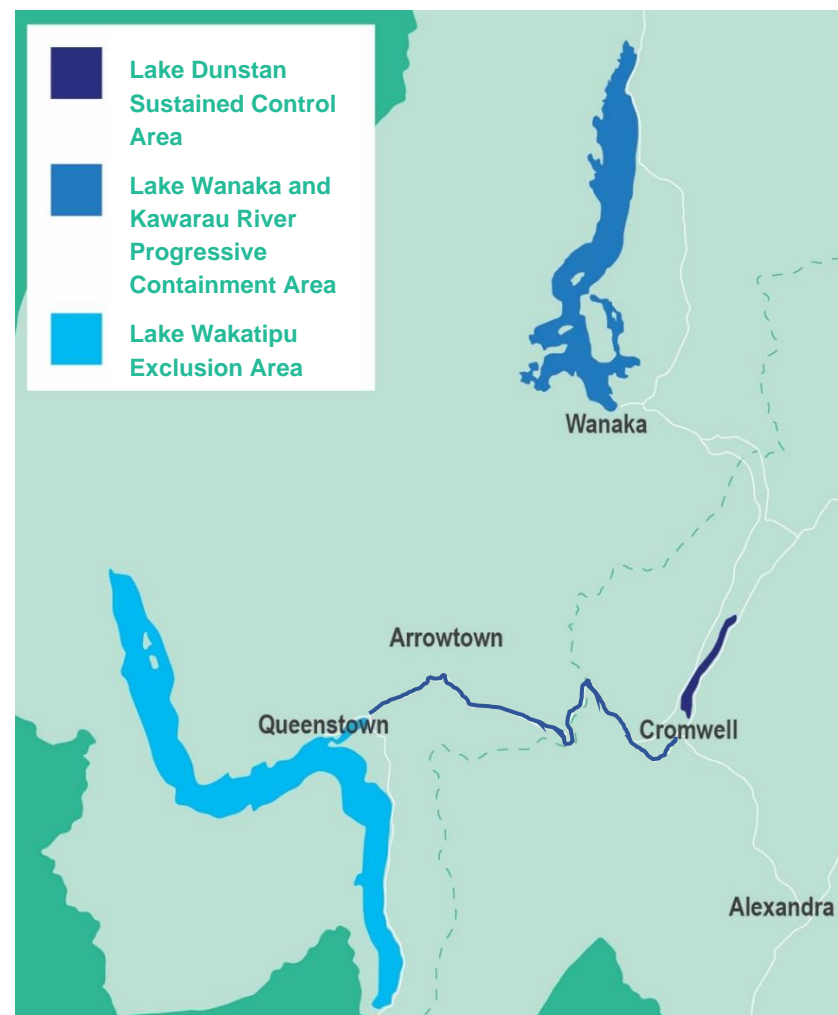
### Action 3.4.1 Provide regional leadership and support for the site-led programmes in the Pest Management Plan to protect indigenous biodiversity

- Provide regional leadership and advocacy, and support community leaders for the Otago Peninsula, West Harbour – Mt Cargill, and Quarantine Island and Goat Island site-led programmes.
- Support the development of ‘whole of site’ management plans for the Otago Peninsula, West Harbour – Mt Cargill, and Quarantine Island and Goat Island.
- Within each ‘whole of site’ management plan, support the identification of smaller sites for specific objectives and activities to protect the significant values of that place and encourage landowner participation in these initiatives.
- Support the delivery of site-led objectives by assisting and facilitating groups to undertake control works, undertaking monitoring of key species, leading some of these activities where needed, and undertaking control works where there are barriers to landowner participation.

### Site-led programmes in the Pest Management Plan to manage the spread of lagarosiphon

The site-led programme seeks to continue ORC’s support for collaborative lagarosiphon management projects led by LINZ and supported by other key parties. Lagarosiphon can be spread by currents and by boats and equipment. Its vigorous growth means that it can quickly shade out and outcompete native species, affecting ecosystems and the ability for people to swim, boat and use the water for recreation. It can also affect water supply intakes.

### The Lagarosiphon Site-led Areas



Lagarosiphon is present in Lakes Dunstan and Roxburgh and parts of Lake Wanaka. It is also present in the Clutha River/Mata-Au and the Kawarau River. Isolated, individual plants are regularly removed from Frankton Arm in Lake Wakatipu to prevent it spreading to the lake.

Most of Otago's lake beds and rivers are administered by LINZ in accordance with the Land Act 1948. The current areas of focus for the control of lagarosiphon are Lake Dunstan, Lake Wanaka and Lake Wakatipu. LINZ has developed 10 Year Lagarosiphon Management Plans for each of these lakes, in collaboration with key parties including ORC, and control works are undertaken in accordance with these management plans. The control works for these programmes are largely funded by LINZ, with some support from other parties and ORC.

The site-led programme for lagarosiphon in the Pest Management Plan requires that these control works continue so that it is controlled in Lake Dunstan to keep important recreation areas clear, its extent is reduced in Lake Wanaka and the Kawarau River over time, and it is kept out of Lake Wakatipu. ORC will continue to support these programmes and advocate to LINZ for long-term suppression of lagarosiphon in Otago and, over time, eradication in key areas.

#### **Action 3.4.2 Advocate and support the continued suppression of lagarosiphon in Otago's lakes and rivers**

- **Support LINZ in the development and review of 10 year Lagarosiphon Management Plans** for the control of lagarosiphon in Otago's lakes and rivers.
- **Continue to support and participate in Check, Clean and Dry campaigns** and advocate for campaign activities to be undertaken in additional areas to further prevent spread.
- **Continue to provide funding to lagarosiphon management** where this supports coordinated action, whilst recognising that LINZ is the key agency undertaking management.
- **Work collaboratively with LINZ on lagarosiphon surveillance** in Otago's lakes and rivers so that potential areas of spread are monitored, and control works are undertaken by LINZ as necessary.

#### **Action 3.4.3 Other site and landscape scale initiatives**

The site-led programmes proposed in the Pest Management Plan seek to support and further bolster existing initiatives where ORC can work in collaboration with key parties. This does not preclude the ability for ORC to support new site and landscape scale initiatives, whether these are long-term projects over large areas, or shorter-term and smaller-scale projects across a smaller area. Particularly where these projects will result in improved biodiversity outcomes.

- **Consider the inclusion of new site-led programmes in the Pest Management Plan** where these can support collaborative and sustained medium term (10 years+) action across a highly valued site or landscape.
- **Provide the ability to include new site-led programmes without a plan review** to the Pest Management Plan in accordance with the guidelines in Appendix 5.4.
- **Support, facilitate and participate in other non-regulatory landscape scale approaches** to manage harmful organisms.
- **Provide facilitation support to smaller, non-regulatory site-based approaches** at a community, group and individual level where appropriate.

**PART FOUR:  
IMPLEMENTATION**



## 4 IMPLEMENTATION

### 4.1 IMPLEMENTATION OF THE BIOSECURITY STRATEGY ACTIONS

The actions contained in Section 3 of this strategy outline how ORC will deliver its regional leadership role, and guides ORC's biosecurity projects and activities. ORC commits to operating in accordance with these actions to mitigate the impacts of harmful organisms over the next 10 years.

In doing this, a number of priority projects and activities have been identified for action over the next five years. This does not negate ORC's responsibility to deliver all the actions within the strategy over time, but seeks to address current issues and opportunities that have been identified in the development of this strategy and the Pest Management Plan.

ORC will prepare an operational plan in accordance with section 100B of the Biosecurity Act within 3 months of the Regional Pest Management Plan becoming operative, that sets out how ORC will administer the Pest Management Plan and the other biosecurity activities outlined in the strategy over the coming 12 months. This will be updated and reported on annually.

This strategy will be reviewed and updated if required after the first five years and subsequently thereafter. New projects and activities may be identified and prioritised, and the outcomes of these reviews will also be used to inform the 10 year review of the Pest Management Plan.

### 4.2 PRIORITY PROJECTS FOR THE FIRST FIVE YEARS OF THE STRATEGY

In addition to the more general outcomes in this strategy that guide ORC's biosecurity activities, the following section identifies key projects and actions within the first five years of implementation to address important issues and opportunities that have been identified while developing the Pest Management Plan and this strategy.



## Proactive Biosecurity Management

Key project / action	ORC Partner / support	Timeframe
Establish and facilitate a biosecurity technical working group to meet twice a year to share ideas and innovations, identify synergies and collaborate on projects.	DOC, MPI, farming, industry, tourism and environmental organisations, Kāi Tahu <a href="#">ki Otago</a> , <a href="#">New Zealand Transport Authority</a>	Within 1 year
Develop a Possum Control programme focusing on OSPRI completed areas for long-term bovine tuberculosis eradication and biodiversity gains. A volunteer landowner programme is anticipated, starting with the Pest Management Plan site-led areas, informed by successful models in other regions.	OSPRI, Landowners, Other regional councils	Within 18 months
Partner with other regional councils to actively advocate for a national marine pathway management plan to minimise the risk of marine pest spread. If a national plan is not instigated: <ul style="list-style-type: none"> <li>look to partner with adjacent councils to develop a sub-national plan;</li> <li><u>or a regional pathway management Plan or a change to the Regional Pest Management Plan.</u></li> </ul> <p><u>ORC will undertake an initial scoping exercise to determine marine species threats in the Otago Harbour and the wider Otago area to determine what management approaches may be appropriate in the Pathway Management Plan.</u></p>	MPI, DOC Other regional councils, <a href="#">Te Rūnanga o Ngāi Tahu</a>	Within 3 years
Establish a surveillance programme for exclusion pests in partnership with neighbouring regional councils where this is efficient and effective. The surveillance programme could also include organisms of interest where these require ORC surveillance.	Neighbouring regions	Within 2 years

## Responsive and Flexible

Key project / action	ORC Partner / support	Timeframe
Prepare updated internal operating procedures for administering the Pest Management Plan for enforcing plan rules, working proactively with land occupiers, and utilising the exemption powers under the Biosecurity Act.		Within 12 months
Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in	Neighbouring regional councils where appropriate, DOC	Over the next 5 years

the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium.

Implement a transition programme for land occupiers within the new gorse and broom free areas and for land containing contorta pine shelters belts and planted conifers under 1ha <del>within the wilding conifer control areas</del> , to assist with proactive management prior to new rules being established. <u>ORC will undertake work to compile a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.</u>		Within 2 years
Develop guidance material on identifying other wilding trees within Otago in addition to wilding conifers, and produce guidance on control and replacement species.	DOC	Within 3 years
Develop and facilitate an urban gorse and broom programme throughout Otago.		Within 5 years
Develop a programme to facilitate the establishment of landowner-led rabbit control groups. This shall be modelled on best practice examples within Otago and other regions.	Other regional councils, DOC Maniototo Pest Management Company	Within 1 year

### Integrated and Collaborative Action

Key project / action	ORC Partner / support	Timeframe
Support the enviro schools programme with key messages, information and tools relating to biosecurity issues in Otago.	District enviro school coordinators	Within 1 year
Promote the newly developed ECO Fund to individuals, groups and non-governmental organisations involved in voluntary initiatives.		Within 6 months
Develop and implement a volunteer facilitation programme to support community volunteer groups in undertaking biodiversity projects and biosecurity control.	DOC	Within 2 years
Develop a shared data platform for biodiversity and biosecurity activities that can be used by ORC staff, community groups and enviro schools to share and analyse information, issues, successes, surveillance and monitoring.	Other district and regional councils, groups, DOC, Kāi Tahu <u>ki Otago</u>	Within 3 years
Actively advocate for and co-lead the development of national or multi-regional pest management responses to address multi-regional impacts of particular species. e.g. wallabies.	Other regional councils, MPI, <u>Te Rūnanga o Ngāi Tahu</u>	Within 2 years

## Landscape Scale and Site Scale

Key project / action	ORC Partner / support	Timeframe
Contribute to the development of the Predator Free Dunedin 2050 'whole of site' management plan/s.	Predator Free Dunedin 2050, Landscape Connections Trust, Otago Peninsula Biodiversity Trust	Within <del>42</del> <u>6</u> months
<p>Following the establishment of the <del>above</del> <u>'whole of site' management plan/s</u>, establish a plan of action for ORC's role in the delivery of the plan outcomes. This shall set out ORC's role in:</p> <ul style="list-style-type: none"> <li>• undertaking control works;</li> <li>• monitoring of key species;</li> <li>• providing guidance on predator prey relationships and how these should be addressed when undertaking control works (e.g. mustelid / rabbit pest control relationship);</li> <li>• leading some of these activities where needed; and</li> <li>• directly undertaking control where there are barriers to landowner participation.</li> </ul>	Predator Free Dunedin 2050, Landscape Connections Trust, Otago Peninsula Biodiversity Trust	Within <del>48</del> <u>12</u> months of the above action
Work in partnership with Dunedin City Council on its landscape scale urban linkages plan to support Predator Free Dunedin.	Dunedin City Council, Predator Free Dunedin 2050	Within 5 years
Develop guidance on how ORC can support groups with smaller site-led initiatives to manage harmful organisms.		Within 12 months



## APPENDIX 1: HARMFUL ORGANISMS IN OTAGO

### PESTS IN THE PEST MANAGEMENT PLAN

Common Name	Scientific Name	Primary Programme
<b>Plants</b>		
African feather grass*	<i>Pennisetum macrourum</i> <i>Cenchrus macrourus</i>	Exclusion
African love grass*	<i>Eragrostis curvula</i>	Progressive containment
Banana passionfruit	<i>Passiflora tripartita</i> var <i>mollissima</i> , <i>P. tripartita</i> var <i>azuayansis</i> , <i>P. tarminiana</i> *, <i>P. pinnatistipula</i> , <i>Passiflora</i> x <i>rosea</i> , <i>P. caerulea</i>	Site-led
Bomarea*	<i>Bomarea caldasii</i> <i>B. multiflora</i>	Progressive containment
Boneseed*	<i>Chrysanthemoides monilifera</i>	Progressive containment
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>	Sustained control
Bur daisy	<i>Calotis lappulacea</i>	Progressive containment
Cape ivy	<i>Senecio angulatus</i>	Progressive containment
Chilean flame creeper	<i>Tropaeolum speciosum</i>	Site-led
Chilean needle grass*	<i>Nassella neesiana</i>	Exclusion
Contorta (lodgepole)	<i>Pinus contorta</i>	Progressive Containment

pine*		
Corsican pine	<i>Pinus nigra</i>	Progressive Containment
Darwin's barberry*	<i>Berberis darwinii</i>	Site-led
<u>Egeria</u>	<u><i>Egeria densa</i></u>	<u>Exclusion</u>
False tamarisk	<i>Myricaria germanica</i>	Exclusion
Gorse	<i>Ulex europeus</i>	Sustained control
<u>Hornwort</u>	<u><i>Ceratophyllum demersum</i></u>	<u>Exclusion</u>
Lagarosiphon*	<i>Lagarosiphon major</i>	Site-led
Larch (excl. sterile hybrids)	<i>Larix decidua</i>	Progressive Containment
Moth plant*	<i>Araujia hortorum</i>	Exclusion
Mountain pine and dwarf mountain pine	<i>Pinus uncinata</i> <i>Pinus mugo</i>	Progressive Containment
Nassella tussock*	<i>Nassella trichotoma</i>	Progressive containment
Nodding thistle	<i>Carduus nutans</i>	Sustained control
Old man's beard*	<i>Clematis vitalba</i>	Progressive containment
Perennial nettle	<i>Urtica dioica</i>	Progressive containment
Ragwort	<i>Senecio jacobaea</i>	Sustained control
Scots pine	<i>Pinus sylvestris</i>	Progressive Containment

Spartina	<i>Spartina spp</i>	Progressive containment
Spiny broom	<i>Calicotome spinosa</i>	Eradication
Sycamore	<i>Acer pseudoplatanus</i>	Site-led
Gunnera	<i>Gunnera tinctoria</i>	Site-led
Tradescantia*	<i>Tradescantia fluminensis</i>	Site-led
White-edged nightshade*	<i>Solanum marginatum</i>	Progressive containment
Wilding conifers	See table 3 in the Pest Management Plan	Progressive containment
Wild Russell lupin	<i>Lupinus polyphyllus</i>	Sustained control
<b>Animals</b>		
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus,</i>	Eradication
Feral cat	<i>Felis catus</i>	Site-led
Feral deer	<i>Cervus elaphus, C. nippon, C. dama</i>	Site-led
Feral goat	<i>Capra aegagrus hircus</i>	Site-led
Feral pig	<i>Sus scrofa</i>	Site-led
Feral rabbit	<i>Oryctolagus cuniculus</i>	Sustained control
Hedgehog	<i>Erinaceous europaeus</i>	Site-led
Mustelids (ferret, stoat, weasel)	<i>Mustelo furo, M. ermine, M. nivalis</i>	Site-led
Poosum	<i>Trichosurus vulpecula</i>	Site-led

Rat (Norway, ship and Kiore)	<i>Rattus norvegicus, R. rattus R. exulans</i>	Site-led
Rook*	<i>Corvus frugilegus</i>	Eradication

\* unwanted organisms

## ORGANISMS OF INTEREST IN OTAGO

Common name	Scientific name
<b>Plants</b>	
Blackberry	<i>Rubus fruticosus</i>
Boxthorn	<i>Lycium ferocissimum</i>
Briar	<i>Rosa rubiginosa</i>
Buddleia	<i>Buddleja davidii</i>
Burdock	<i>Arctium minus</i>
Convolvulus	<i>Convolvulus arvensis</i>
Cotoneaster	<i>Cotoneaster spp.</i>
Cotton thistle	<i>Onopordum acanthium</i>
Egeria	<i>Egeria densa</i>
Giant hogweed	<i>Heracleum mantegazzianum</i>
Hawthorne	<i>Crataegus monogyna</i>
Hieracium (Hawkweed)	<i>Hieracium spp.</i>
Heath rush	<i>Juncus squarrosus</i>
Horehound	<i>Marrubium vulgare</i>

Japanese honeysuckle	<i>Lonerica japonica</i>
<u>Japanese knotweed</u>	<u><i>Fallopia japonica</i></u>
Lake snow	<i>Lindavia intermedia</i>
Periwinkle	<i>Vinca major</i>
<u>Purple loosertrife</u>	<u><i>Lythrum salicaria</i></u>
Reed sweetgrass	<i>Glyceria maxima</i>
Rowan	<i>Sorbus aucuparia</i>
Saltmarsh rush	<i>Juncus <del>geraldii</del>-geraldii</i>
<u>Spanish heath</u>	<u><i>Erica lusitanica</i></u>
Thyme	<i>Thymus vulgaris</i>
<u>Tree Lupin</u>	<u><i>Lupinus arboretums</i></u>
<u>Veldt grass</u>	<u><i>Ehrharta erecta</i></u>
Wild ginger	<i>Hedychium gardnerianum</i>
Willow	<i>Salix</i> spp.
<u>Yellow bristle grass</u>	<u><i>Setaria pumila</i></u>

### Animals

Goose	
Canada	<i>Branta canadensis</i>
White/domestic	<i>Anser</i> spp.
Mouse	<i>Mus musculus</i>
Wasp	<i>Vespula</i> spp.

### Marine

Asian paddle crab	<i>Charybdis japonica</i>
Mediterranean fanworm	<i>Sabella spallanzanii</i>
Sea squirts	<i>Styela clava</i> , <i>Eudistoma elongatum</i> , <i>Pyura doppelgangera</i> and <i>Didemnum vexillum</i>
Sea couch	<i>Agropyron pungens</i>
Undaria	<i>Undaria pinnatifida</i>

### Freshwater

Goldfish	<u><i>Carassius auratus</i></u>
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### UNWANTED ORGANISMS

For a full list of unwanted organisms in New Zealand please visit the Ministry for Primary Industry's website:  
<https://www.mpi.govt.nz/protection-and-response/finding-and-reporting-pests-and-diseases/registers-and-lists/>

## APPENDIX 2: GUIDANCE FOR THE INCLUSION OF SITE-LED PROGRAMMES IN THE PEST MANAGEMENT PLAN

ORC may consider including an additional site-led programme or amend an existing site-led programme in the Pest Management Plan where this meets the requirements of the Biosecurity Act and results in positive benefits to the environment and people.

This appendix provides guidance for when a site-led programme may be included without the need to undertake a plan change to the Pest Management Plan:

- The area has significant value at a community, district, regional or national scale. For example:
  - Significant indigenous vegetation.
  - Significant habitats of indigenous fauna.
  - Outstanding natural character, features and landscapes.
- There is strong volunteer and/or community support for the programme, including from landowners who are willing to provide access to private property.
- The programme will result in environmental, social and/or cultural benefits.
- The programme meets the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015.
- There is an agreement with the Otago Regional Council about:
  - How the site will be managed.

- How the programme will be delivered.
- The nature and level of support needed from ORC.
- The programme is resourced for its duration.



## ACKNOWLEDGEMENT

ORC would like to sincerely thank the communities and stakeholders whose input has been invaluable in preparing the Biosecurity Strategy.

While the Biosecurity Strategy is a non-statutory document, ORC is committed to working collaboratively with stakeholders, groups, communities and individuals to implement the Strategy to achieve good biosecurity outcomes in Otago.

Photo source list

01: Northland Regional Council

02: DOC

03: DOC

04: Environment Southland

05: DOC

06: Environment Southland

07: Otago Peninsula Biodiversity Group

08: Otago Peninsula Biodiversity Group

09: Otago Peninsula Biodiversity Group



Otago  
Regional  
Council

**OTAGO REGIONAL  
PEST MANAGEMENT  
PLAN  
2019-2029**





## Foreword

The ecosystems and landscapes across our large and diverse region are unique and provide benefits to us both economically and environmentally.

Many of New Zealand's introduced species have significant effects on our environment, biodiversity and economy. Pests such as rabbits, wallabies, gorse, broom, ragwort and nassella tussock have an adverse effect on our production land, impacting our economy and rural communities.

Our landscape, amenity and recreation values are affected by the spread of wilding conifer trees, and aquatic weeds like lagarosiphon. Our environment and habitats of indigenous species are impacted by pest plants such as old man's beard, which smothers and kills native vegetation, and predator pests which kill our indigenous wildlife.

The Biosecurity Act 1993 is the national legislation that sets out how central government and regional councils deal with pests and unwanted organisms in New Zealand. It enables regional councils to develop regional pest management plans to control and manage pests in their region by setting objectives and rules.

The Otago Regional Pest Management Plan identifies 51 species to be managed by land occupiers, often with the involvement of Otago Regional Council. It builds on the 2009 Pest Management Plan by introducing new objectives and rules for a range of new species including wilding conifers, wild Russell lupin, and other plant and predator pests, and introduces new rules and controls for many of the existing species such as rabbits and gorse and broom.

In developing the Otago Regional Pest Management Plan, as well as ensuring this meets the new Biosecurity Act requirements, the council has consulted and engaged with many different stakeholders, groups and individuals. Their feedback has shaped our Plan, and our associated Biosecurity Strategy. Together these seek to protect the things we treasure from the impacts of harmful organisms.

Thank you to all those who have contributed their feedback to this review and have assisted in developing the Otago Regional Pest Management Plan.



A handwritten signature in black ink, appearing to read 'S Woodhead', written in a cursive style.

Stephen Woodhead

Chairman

Otago Regional Council

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## Otago Regional Council Regional Pest Management Plan

There are five programmes that are used to manage pests in Otago

**Exclusion Programmes:** to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet in an area.

<b>Plants</b>	African feather grass	Chilean needle grass	Egeria
	False tamarisk	Hornwort	Moth plant

**Eradication Programmes:** to reduce the infestation of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term.

<b>Plants</b>	Spiny Broom		
<b>Animals</b>	Bennett's wallaby	Rook	

**Progressive Containment Programmes:** to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time.

<b>Plants</b>	African love grass	Bomarea	Boneseed
	Bur daisy	Cape ivy	Nassella tussock
	Old man's beard	Perennial nettle	Spartina
	White-edged nightshade	Wilding conifers	

**Sustained Control Programmes:** to provide ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties.

<b>Plants</b>	Broom	Gorse	Nodding thistle
	Ragwort	Wild Russell lupin	
<b>Animals</b>	Feral rabbits		

**Site-led Programmes:** that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place.

<b>Plants</b>	Banana passionfruit	Chilean flame creeper	Darwin's barberry
	Gunnera	Lagarosiphon	Sycamore
	Tradescantia (wandering willie)		
<b>Animals</b>	Bennett's wallaby	Feral cat	Feral deer (incl. hybrids)
	Feral goat	Feral pig	Hedgehog
	Mustelids (ferret, stoat, weasel)	Possum	Rat (Norway, ship and Kioere)

The maps illustrating the site-led areas are provided in Appendix 3 to the Plan.

In accordance with section 100B of the Biosecurity Act 1993, Otago Regional Council will prepare an Operational Plan to implement this Regional Pest Management Plan. This Operational Plan will be reviewed annually in accordance with the Act and the monitoring principles outlined in Section 7 of this Plan.

# PART ONE: PLAN ESTABLISHMENT

*Broom*

## 1. INTRODUCTION

### 1.1 PURPOSE OF THE PLAN

Regional councils have a mandate under Part 2 of the Biosecurity Act 1993 to provide regional leadership in activities that prevent, reduce, or eliminate adverse effects from harmful species that are present in their region. Otago Regional Council (ORC) holds this role in the Otago region.

The purpose of the Plan is to outline the framework to efficiently and effectively manage or eradicate specified organisms in the Otago region. Doing so will:

- minimise the actual or potential adverse or unintended effects associated with those organisms; and
- maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach.

Many organisms in the Otago region are considered undesirable or a nuisance. This Plan manages pests where individual action or inaction in managing pests imposes undue economic, social, cultural or environmental effects and where efficient and effective pest control methods are available.

The Act has prerequisite criteria that must be met to justify such intervention.

The Plan empowers the ORC to exercise the relevant advisory, service delivery, regulatory, monitoring and funding provisions available under the Act to deliver the specific objectives identified in Part Two: Pest Management.

### 1.2 DURATION

The Plan will take effect on the date on which the ORC affixes its seal and it becomes operative as a Regional Pest Management Plan under section 77 of the Act. It is proposed to remain in force for a period of 10 years following it becoming operative. The Plan may cease at an earlier date if the ORC declares by public notice that the objectives of the Plan have been achieved. It may also cease at an earlier date if, following a review, it is revoked. A review of the Plan as a whole must be undertaken after 10 years.

### 1.3 COVERAGE

The Plan will operate within the administrative boundaries of the Otago region and covers a total area (land and sea) of approximately 32,000km<sup>2</sup> (see map below). The exclusion, eradication, progressive containment and sustained control programmes outlined in the Plan apply to the entire Otago region unless a specific, smaller area is described within the relevant programme.

### 1.4 THE BIOSECURITY STRATEGY

In conjunction with the Plan, ORC has also prepared a Biosecurity Strategy (the Strategy) which sets out ORC's objectives for biosecurity management in the region using the full range of statutory and non-statutory tools available. How ORC manages biosecurity, including the management of organisms capable of causing adverse or undesirable effects is covered in the Biosecurity Strategy. The Biosecurity Strategy discusses all tools

available to ORC, both regulatory and non-regulatory, to manage biosecurity risks for any organism, not just those formally declared as pests in the Plan.

Figure 1: The Otago Region



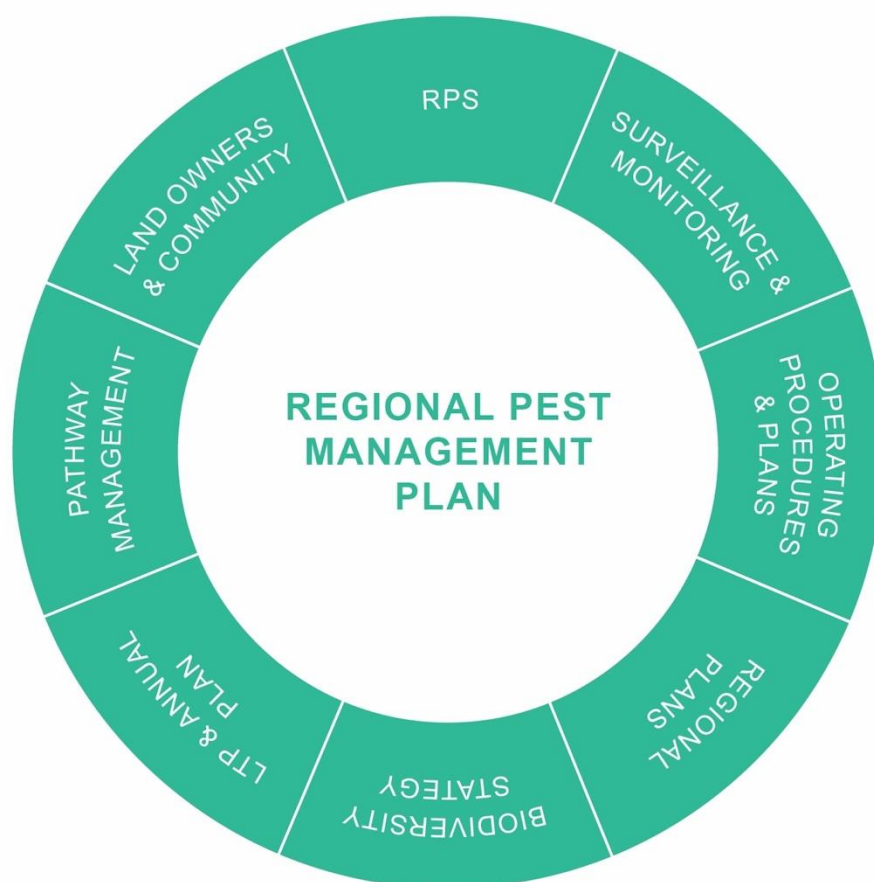
## 2. PLANNING, STATUTORY AND STRATEGIC BACKGROUND

### 2.1 STRATEGIC BACKGROUND

#### 2.1.1 Otago Regional Council's biosecurity framework

Regional pest management sits within an integrated biosecurity framework for the Otago region. The Plan is supported by a number of complementary policies, plans, duties and functions, as illustrated in Figure 2 below. Landowners and/or occupiers and the wider community, either as beneficiaries or exacerbators (the person aggravating or contributing to a particular pest management problem by action or inaction) or both interact with these policies, plans, duties and functions.

Figure 2: Otago Regional Council's Biosecurity Framework



**Proposed Biosecurity Strategy:** The purpose of the Biosecurity Strategy is to set out the ORC's wider biosecurity approach and to prioritise a programme of action to be implemented for effective biosecurity management across the Otago region.

The Biosecurity Strategy is a non-regulatory document that has been prepared by the ORC as part of a 'whole of Council approach' for biosecurity in the Otago region. It integrates the ORC's statutory and non-statutory biosecurity functions, including guiding the delivery, monitoring and review of the Plan.



**Regional Policy Statement and Regional Plans:** The Regional Policy Statement for Otago (RPS) and the Regional Water and Coast plans contain objectives, policies, rules and methods that support and complement the Plan.

In particular, the RPS contains policies and methods to:

- Control the adverse effects of pest species, prevent their introduction and reduce their spread, particularly where pests adversely affect lakes, rivers and wetlands, the coastal environmental, soil, ecosystems and indigenous biodiversity;
- Control the adverse effects of pest species, prevent their introduction and reduce their spread to safeguard indigenous species and their habitats, ecosystem services that support economic activities, water quality and quantity, soil quality, human and animal health, recreation values, landscapes, seascapes and natural character;
- Encourage, facilitate and support activities which control pests; and
- Prioritise pest management activities in areas of significant indigenous biological diversity and habitats of significant fauna.

**Long Term and Annual Plan:** The Otago Regional Council Long Term Plan (LTP) and the Annual Plan are developed by the ORC in accordance with the Local Government Act 2002 (LGA) and Local Government (Rating) Act 2002. These plans guide the spending of rates, including spending for biosecurity purposes. The Annual Plan sets out the annual operational budgets for the ORC's biosecurity functions.

**Otago Regional Council Biodiversity Strategy:** The Biodiversity Strategy is a high-level document prepared in accordance with the LGA. The Strategy guides how the ORC will support the maintenance of indigenous biological diversity in the region.

The Biodiversity Strategy outcomes seek to reduce the impact of pests on indigenous species, provide more pest management information and support community-led initiatives.

**Operational plans and procedures:** The Act requires that an operational plan be prepared and reported on annually in accordance with section 100B. An operational plan sets out how the Plan is to be implemented and the report on the operational plan sets out ORC's progress towards meeting the Plan objectives.

**Surveillance and monitoring program:** ORC undertakes monitoring and surveillance activities in order to measure the progress made in managing pests. This may also include monitoring the Organisms of Interest in Appendix 1, and any other organisms that may present a threat to the region.

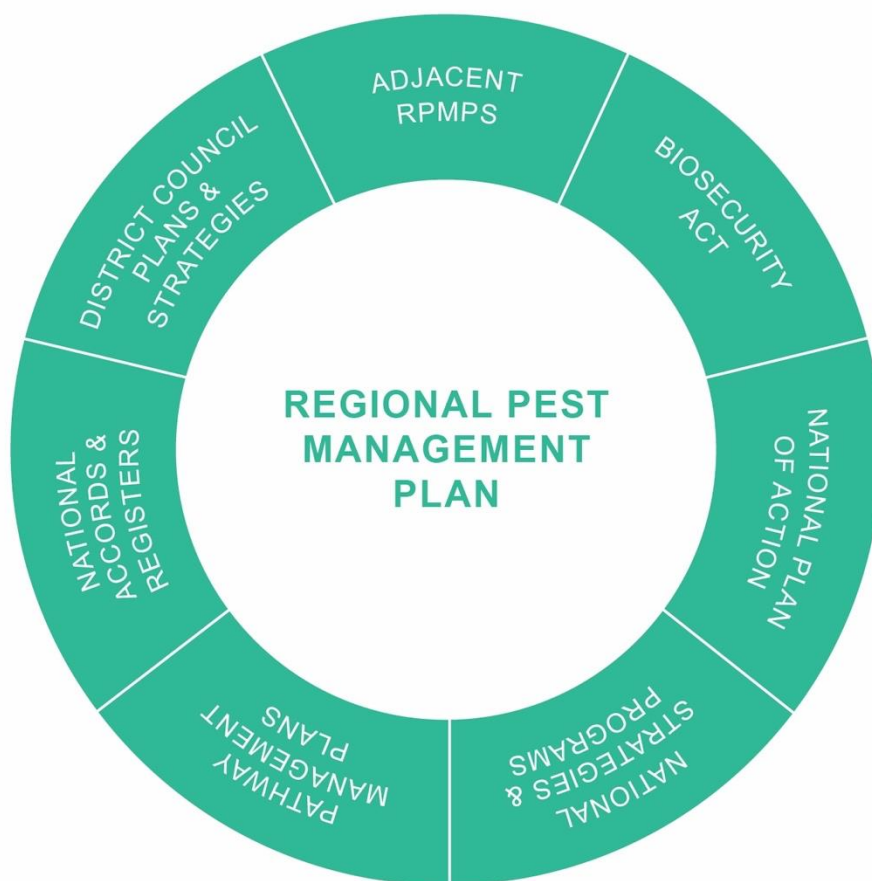
**Pathway management plans:** Like pest management plans, the Act enables the establishment of pathway management plans which focus on managing the movement and incursion routes of pests. These can be established at a regional or national level. No national pathway management plans are currently in place. No pathway management plan is proposed for Otago at this stage, but this will be explored in the future in accordance with the Biosecurity Strategy.

### 2.1.2 Wider biosecurity framework

An effective biosecurity framework not only works at a regional level, but at a local and national level. Central Government is responsible for preventing pests from entering New

Zealand and providing national leadership, coordination and implementation of pest incursions for eradication purposes. Other regional pest plans, pathway management plans and national legislation, policy and initiatives influence the Plan. The plans and strategies of territorial authorities also have a complementary role in biosecurity. As a result, a regional pest management plan is an integral component of a comprehensive biosecurity framework that protects New Zealand’s environmental, economic, social and cultural values from pest threats.

Figure 3: Wider biosecurity framework



**District council plans and strategies:** There are a number of district council plans and strategies that are relevant to the Plan and were taken into account during its development. In particular,

- The Dunedin City Council Environment Strategy 2016 seeks that pest management activities benefit Dunedin’s natural ecosystems and that the best technology is used to manage pests.
- The Waitaki Biodiversity Strategy 2014 seeks to support community and voluntary actions for pest management, work collaboratively with other agencies, and to provide information on pest control and prevention measures.
- The Queenstown Lakes District Council Parks and Open Space Strategy 2017 seeks collaborative action on pest management activities in the district, and The Wakatipu

Wilding Conifer Control Strategy 2013-2017 outlines goals and actions to manage wilding conifers in the district.

**Adjacent regional pest management plans:** The Canterbury, West Coast and Southland regions adjoining the Otago region also have regional pest management plans in place that are relevant to the Otago Plan. This includes the Fiordland Regional Marine Pest Pathway Plan which restricts the spread of marine pests into Fiordland.

**National accords and registers:** The National Pest Plan Accord (NPPA) and National Pest Pet Biosecurity Accords (NPPBA) are cooperative agreements. The NPPA have agreements between Ministry for Primary Industries (MPI), Department of Conservation (DoC), regional councils and New Zealand Plant Producers Incorporated. The NPPBA have agreements between Ministry for Primary Industries (MPI), DoC, regional councils, Pet Industry Association and the New Zealand Companion Animal Council. The approximately 207 plant species identified in the NPPA are declared Unwanted Organisms in accordance with Part 9 of the Biosecurity Act and banned from propagation, sale and distribution. The NPPBA seeks to regulate the domestic trade of high-risk pets and encourage responsible pet ownership.

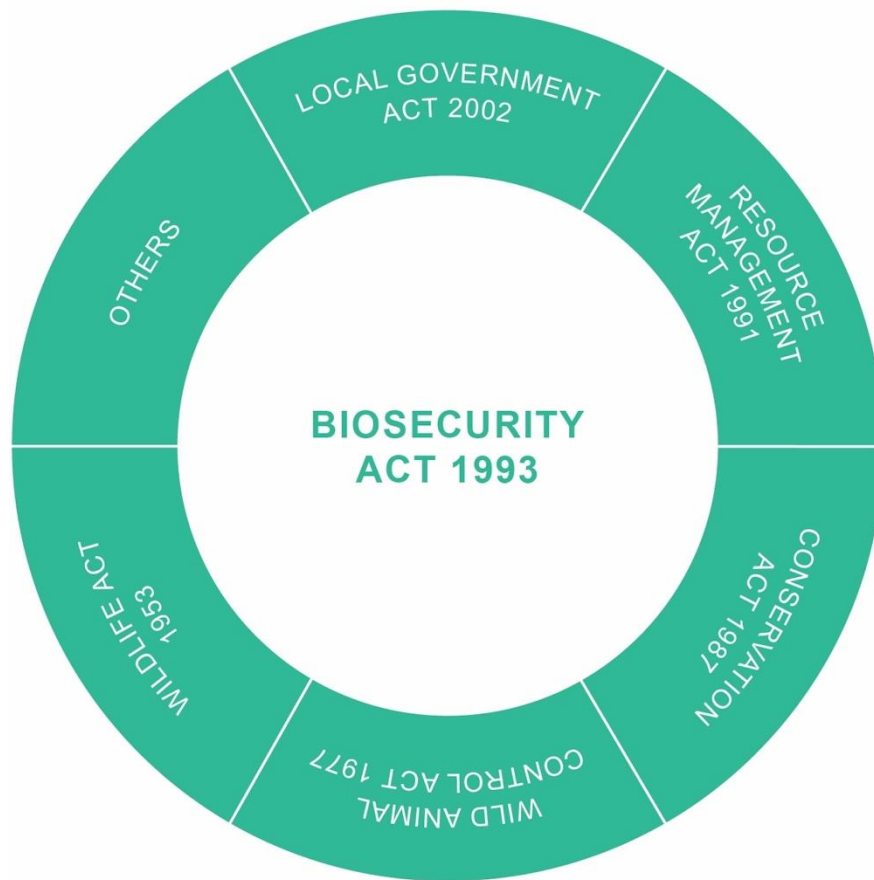
**National plan of action:** The Pest Management National Plan of Action sets out a number of national improvements to improve how pest management is implemented across the country including improving collective action and consistency, goal setting and measurement and pest management outcomes overall.

**National strategies and programmes:** The New Zealand Wilding Conifer Management Strategy 2015 – 2030 sets objectives to improve the management of wilding conifers at a national level. The New Zealand Biodiversity Action Plan 2016 and the Predator Free 2050 Programme set ambitious goals to manage the effects of pests (particularly animal predators) on indigenous biodiversity. The Plan seeks to support these national objectives by managing pest species that impact on biodiversity and indigenous flora and fauna. MPI's Freshwater Biosecurity Partnership Programme aims to reduce the spread and impacts of freshwater pests, increasing understanding of freshwater pests among all freshwater users and for freshwater users to adopt behaviour that prevents the spread of pests. MPI's Velvetleaf Management Programme aims to stop the spread of velvetleaf within and between farms, increase knowledge on how to effectively manage this weed and to support landowners and rural contractors to control velvetleaf.

## 2.2 LEGISLATIVE BACKGROUND

There are a number of different Acts that govern regional council functions and duties. Pest management is not dependent on one particular statute, however the Biosecurity Act 1993 is the key legislative instrument to efficiently and effectively manage specified harmful organisms through the development and implementation of regional pest management plans. This is supported by other legislative statutes which supports effective pest management in the region.

Figure 4: Biosecurity legislation



### 2.2.1 Biosecurity Act 1993

The Act is purpose-built for pest management. A regional council can use the Biosecurity Act to exclude, eradicate or effectively manage pests in its region, including unwanted organisms. A regional council is not legally obliged to manage pests, unless it chooses to do so. As such, the Act's approach is enabling rather than prescriptive. It provides a framework to gather intervention methods into a coherent system of efficient and effective actions.

A number of amendments have occurred since 1993. Changes of relevance to regional pest management, and particularly advanced through the Biosecurity Law Reform Act 2012, include:

- Regional pest management strategies are to be redeveloped as regional pest management plans. Provision has also been made for explicit pathway management plans in addition to specified pest management plans.
- The Crown will be bound to the requirements of the Good Neighbour Rules (GNRs) specified in a regional pest management plan. Such rules apply to all occupiers within the area over which the rules apply but they can only address pests spread across a property boundary.

- The Act provides for the National Policy Direction for Pest Management 2015 (NPD). Regional pest management plans must not be inconsistent with the NPD. Further details of the NPD are provided under section 2.2.2 below.
- A mandatory plan review need not occur before 10 years. However, review of a whole plan or part of a plan can take place at any time if necessary.

Three sections of the Act are particularly pertinent to regional councils:

## **Part 2: Functions, Powers and Duties in a Leadership Role**

Regional councils are mandated under Part 2 (functions, powers and duties) of the Act to provide regional leadership for biosecurity activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in its region.

Section 12B(1) of the Act sets out how regional councils provide leadership. It includes ways that leadership in pest management issues can help to prevent, reduce or eliminate adverse effects from harmful organisms. Some of these activities include helping to develop and align regional pest management plans and regional pathway management plans in the region, promoting public support for managing pests, and helping those involved in managing pests to communicate and cooperate so as to make programmes more effective, efficient, and equitable.

Section 13(1) of the Act sets out powers that support regional councils in this leadership role. This includes:

- Monitor and survey pests, pest agents, and unwanted organisms;
- Provide for the assessment and eradication or management of pests in accordance with relevant pest management plans;
- Prepare proposals for, “make” and implement regional pest management plans;
- Appoint a management agency for a plan;
- Disallow an operational plan or part of it;
- Review, amend, revoke and replace, or revoke a plan;
- Declare and implement small-scale management programmes, and
- Gather information, keep records and undertake research.

## **Part 5: Pest Management**

Part 5 of the Act specifically covers pest management, including regional pest management. Its purpose is to provide for the eradication or effective management of harmful organisms. A harmful organism is assigned pest status when it is included in a regional pest management plan. Sections 69–78 of the Act prescribe the process for developing regional pest management plans, involving six steps from initiating a plan (by a proposal), to ensuring affected parties are consulted, and develop efficient regulatory and funding mechanisms.

While a regional council may initiate a regional pest management plan, it is also required to assess and undertake decision-making responsibilities in relation to all proposed pest management plans put forward by any another person or organisation.

## Part 6: Administering a Regional Pest Management Plan

Once a regional pest management plan has commenced, the management agency specified in the plan may exercise the powers in Part 6 of the Act to implement the plan where the plan provides for the agency to exercise the power. These powers include the necessary regulatory powers, instruments and cost recovery mechanisms needed for administering the plan.

### 2.2.2 National Policy Direction for Pest Management 2015

The Act provides for the National Policy Direction for Pest Management 2015 (NPD). The purpose of the NPD is to ensure that activities under Part 5 of the Act (Pest Management) provide the best use of available resources for New Zealand's best interests, and align with each other (when necessary), to contribute to the eradication or effective management of harmful organisms present in New Zealand (the purpose of Part 5). The NPD does this by:

- (a) clarifying requirements for Part 5 regulatory instruments; and
- (b) ensuring consistent application of these requirements nationally and between regions, as appropriate.

Regional pest management plans must not be inconsistent with the NPD, which requires that:

- Objectives must follow a prescribed content;
- Management outcomes must align with one of five programmes: Exclusion, Eradication, Progressive Containment, Sustained Control or Site-led;
- Benefits and costs must be analysed in a prescribed manner and must be documented;
- Allocation of costs must be analysed in a prescribed manner; and,
- The construction of GNRs must address specified criteria.

Table 1: NPD requirements and the steps taken to comply with them

NPD requirements	Steps taken to comply
Objectives are set	The structure of the objectives used in Section 5 of Part 2 of the Plan align with the requirements of clause 4 of the NPD.
The use of programmes	The types of programmes (described in Part 2 of the Proposal) match those set out in clause 5 of the NPD.
Benefits and costs are analysed	An analysis of the costs and benefits has been undertaken in accordance with clause 6 of the NPD. The full analysis is published in the reports <i>Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits October 2018</i> and <i>Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Additional analysis of costs and benefits August 2019</i> (the CBA Reports).

Funding rationale is noted	The funding rationale described in Section 9 of the Plan has been developed in line with clause 7 of the NPD.
Good Neighbour Rules are described	GNRs have been developed in line with clause 8 of the NPD.

### 2.2.3 Resource Management Act 1991

Regional councils have functions and duties under the Resource Management Act 1991 (RMA) to sustainably manage the natural and physical resources of the region, including the Coastal Marine Area (CMA). These responsibilities include sustaining the potential of natural and physical resources, safeguarding life-supporting capacity and protecting environmentally significant areas and habitats (section 5(2) and section 6(c)).

The RMA sets out the functions of regional councils in relation to the maintenance and enhancement of ecosystems in the CMA of the region (section 30(1)(c)(iii)), the control of actual or potential effects of use, development or protection of land (section 30(1)(d)(v)), and the establishment, implementation and review of objectives, policies and methods for maintaining indigenous biological diversity (section 30(1)(ga)).

The focus of the RMA is on managing adverse effects on the environment through regional policy statements, regional and district plans, and resource consents. The RMA, along with regional policies and plans can be used to manage activities so that they do not create a biosecurity risk or those risks are minimised. While the Biosecurity Act is the main regulatory tool for managing pests, there are complementary powers within the RMA that can be used to ensure the problem is not exacerbated by activities regulated under the RMA.

The Biosecurity Act cannot over-ride any controls imposed under the RMA, for example, bypassing resource consent requirements.

### 2.2.4 Local Government Act 2002 and Local Government (Rating) Act 2002

The LGA provides “a framework and powers for local authorities to decide which activities they undertake and the manner in which they will undertake them”. The Local Government (Rating) Act 2002 is a companion Act, which provides local authorities with flexible powers to set, assess, and collect rates to fund local government activities; ensures rates are set in accordance with decisions that are made in a transparent and consultative manner; and enables ratepayers to identify and understand their liability for rates.

Both of these Acts support the ORC’s biosecurity activities, particularly through the ORC’s ability to access rates as a funding source and to differentiate rates into both general and targeted categories.

### 2.2.5 Wild Animal Control Act 1977 and the Wildlife Act 1953

The Wild Animal Control Act 1977 and the Wildlife Act 1953, the Freshwater Fisheries Regulations 1983 (both administered by the Department of Conservation) have a role in relation to managing animals.

- (a) The Wild Animal Control Act 1977 (WAC Act) controls the hunting and release of wild animals and regulates deer farming and the operation of safari parks. The Wild Animal Control Act 1977 empowers the Department of Conservation to control wild

deer, chamois, thar, wild goats and wild pigs. It also gives local authorities the power to destroy wild animals under operational plans that have the Minister of Conservation's consent.

- (b) The Wildlife Act 1953 (WL Act) controls and protects wildlife not subject to the WAC Act. It identifies which wildlife are not protected (e.g., mustelids, possums, wallabies, rooks, feral cats); which are to be game (e.g., mallard ducks, black swan); and which are partially protected or are injurious.
- (c) The Freshwater Fisheries Regulations 1983 place controls on people who possess, control, rear, raise, hatch or consign noxious fish without authority.

### **2.2.6 Other legislation**

Other legislation, such as the Reserves Act 1977 and the Conservation Act 1987, contain provisions that support pest management within a specific context. The role of regional councils under such legislation in relation to pest management is limited to advocacy.

## **2.3 RELATIONSHIP WITH OTHER PLANS AND REGULATIONS**

### **2.3.1 Pest Management Plans**

A regional pest management plan must not be inconsistent with:

- (a) any national pest management plan or regional pest management plan that is focused on the same organism;
- (b) any pathway management plan; or
- (c) any regulation.

There are no known inconsistencies with other pest management plans on the same organism or any pathway management plan. A number of organisms included in the Canterbury, West Coast and Southland councils' regional pest management plans are not included in this Plan. However, the test is in relation to any other pest management plan on the same organism. If the organism is not in the Plan, then there is no inconsistency.

Possums and mustelids are subject to the National Pest Management Plan for Bovine Tuberculosis (TB). The objective for the National Plan is the eradication of TB. This affects the context for each region and does not constitute an inconsistency between plans.

### **2.3.2 Resource Management Act Plans**

The Plan must not be inconsistent with the Otago Regional Policy Statement (RPS) or any regional plan developed in accordance with the RMA. The RPS signals that ORC will address pest management issues through a regional pest management plan developed under the Act. There is no inconsistency between the Plan and the RPS.

### **2.3.3 Regulations**

There are no known inconsistencies with any regulations.

## **2.4 RELATIONSHIP WITH MĀORI**

One specific purpose of a regional pest management plan under the Act is to provide for the protection of the relationship between Māori and their ancestral lands, waters, sites,



wāhi tapu, and taonga, and to protect those aspects from the adverse effects of pests. Māori involvement in biosecurity is an important part of exercising kaitiakitaka. Māori also carry out significant pest management through their primary sector economic interests and as land owners and/or occupiers.

The LGA requires councils to recognise and respect the Crown's responsibilities under the Tiriti o Waitangi - Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes considering ways to help Māori to contribute. These responsibilities and requirements were met while preparing this Plan and will continue after it takes effect.

In Otago, the Kāi Tahu ki Ōtago Natural Resource Management Plan 2005 outlines particular issues in relation to pest management and biodiversity and includes particular areas or sites of value. Using this plan as a basis, ongoing consultation will be maintained during the life of the Plan to discuss pest species that are having an impact on sites of value to rūnanga.

Ongoing consultation is also required to ensure implementation of the Plan provides for the customary harvesting of species.

### **3. RESPONSIBILITIES AND OBLIGATIONS**

#### **3.1 THE MANAGEMENT AGENCY**

Otago Regional Council is the management agency responsible for implementing the Plan.

In addition to implementation methods detailed in the Plan ORC maintains an internal set of operating procedures to guide the delivery of the Plan.

Pest management in Otago is a shared responsibility and, while ORC will be the management agency, pest management will be undertaken by many different stakeholders, agencies, community groups and individuals. This approach will result in effective and enduring pest management outcomes for the region.

#### **3.2 COMPENSATION AND DISPOSAL OF RECEIPTS**

The Plan does not provide for compensation to be paid to any persons meeting their obligations under its implementation. However, should the disposal of a pest or associated organism provide any net proceeds, a person will be paid disbursement in the manner noted under section 100I of the Act.

#### **3.3 AFFECTED PARTIES**

##### **3.3.1 Responsibilities of occupiers (including owners)**

Pest management is an individual's responsibility in the first instance because generally occupiers contribute to the pest problem and in turn benefit from the control of pests. The term "occupier" has a wide definition under the Act and includes:

- the person who physically occupies the place; and
- the owner of the place; and

- any agent, employee, or other person acting or apparently acting in the general management or control of the place.

Under the Act, “place” includes: any building, conveyance, craft, land or structure and the bed and waters of the sea and any canal, lake, pond, river or stream.

Occupiers must manage pests in accordance with the rules. If they fail to meet the rules’ requirements, they may face legal action. For example, some rules specify that a contravention of the rule creates an offence under section 154N(19) of the Act. Occupiers (and other persons) must not sell, propagate, breed or distribute pests.

An authorised person may enter and inspect any place, at any reasonable time, to:

- find out whether pests are on the property;
- manage pests; or
- ensure the owner and/or occupier is complying with biosecurity law.

While the occupier may choose the methods they will use to control any pests, they must also comply with the requirements under other legislation (for example the RMA and/or the Hazardous Substances and New Organisms Act 1996).

This Plan treats all private land equitably and emphasises the responsibilities and obligations of all occupiers. ORC acknowledges the complexity around Māori land which is multiply owned. Where occupiers are unknown, the Māori Land Court or the Registrar of Companies may help to identify and assist in communication with owners.

### **3.3.2 Crown agencies**

Under section 69(5) of the Act, the Crown is liable to meet the obligations or costs that are required to meet GNRs contained within regional pest management plans. A GNR addresses situations where a pest may spread across a property boundary, where that spread impacts a neighbouring property where that pest is being controlled.

### **3.3.3 Territorial authorities**

Five territorial authorities are wholly or partly contained within the Otago region. They are:

- Dunedin City Council
- Clutha District Council
- Central Otago District Council
- Queenstown Lakes District Council
- Waitaki District Council - straddles both the Otago and Canterbury regions.

Territorial authorities are required to control pests on land that they occupy, in accordance with the rules of the Plan and to meet the costs of doing so.

### **3.3.4 Road reserves and rail corridors**

For the purposes of this Plan, the control of pests on roads is the responsibility of occupiers of roads.

For formed roads, the person responsible for the general management or control of the main carriageway is the occupier. Where the road reserve of a formed road is occupied by a neighbouring private landholder, the person responsible is the person physically occupying that area of the road reserve. For unformed roads, the person responsible is the person physically occupying the unformed road or, if it is unoccupied, the owner or person acting in the general management or control of that place.

The New Zealand Transport Agency (NZTA) is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to provisions applicable to a land occupier for the purposes of obligations for pest control, on road reserves or verges in terms of the Act (as described in Part Two of this Plan).

For the purposes of the Act, KiwiRail is also treated separately to the Crown, and comes within the definition of an occupier of land under the Act. Accordingly, it has obligations and responsibilities for pest management on the land that it occupies, equal to those of other occupiers.

ORC will work with NZTA and Kiwirail by agreement to manage mutual obligations and expectations. This may include the development of agreements which provide a comprehensive approach to the management of pests in the rail corridor and road corridors in accordance with the Objectives and Rules of the Plan and any exemption/s in accordance with section 78 of the Biosecurity Act 1993.

# PART TWO: PEST MANAGEMENT



*Tradescantia*

## PART TWO: PEST MANAGEMENT

### 4. ORGANISM DECLARATIONS

#### 4.1 ORGANISMS DECLARED AS PESTS

The organisms listed in Table 2 are classified as pests. The table also indicates what management programme or programmes will apply to the pest and if a Good Neighbour Rule (GNR) applies.

Attention is also drawn to the **statutory obligations** of any person under section 52 and section 53 of the Act. Those sections ban anyone from selling, propagating or distributing any pest, or part of a pest, covered by the Plan. Not complying with section 52 and section 53 is an offence under the Act and may result in the penalties noted in section 157(1).

Table 2: Organisms classified as pests

Common Name	Scientific Name	Primary Programme	Good Neighbour Rule
<b>Plants</b>			
African feather grass*	<i>Cenchrus macrourus</i>	Exclusion	
African love grass*	<i>Eragrostis curvula</i>	Progressive containment	
Banana passionfruit	<i>Passiflora tripartita</i> var <i>mollissima</i> <i>P. tripartita</i> var <i>azuayansis</i> <i>P. tarminiana</i> * <i>P. pinnatistipula</i> <i>Passiflora x rosea</i> <i>P. caerulea</i>	Site-led	
Bomarea*	<i>Bomarea caldasii</i> B. <i>multiflora</i>	Progressive containment	
Boneseed*	<i>Chrysanthemoides monilifera</i>	Progressive containment	
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>	Sustained control	Yes
Bur daisy	<i>Calotis lappulacea</i>	Progressive containment	
Cape ivy	<i>Senecio angulatus</i>	Progressive containment	
Chilean flame creeper	<i>Tropaeolum speciosum</i>	Site-led	
Chilean needle grass*	<i>Nassella neesiana</i>	Exclusion	
Contorta (lodgepole) pine*	<i>Pinus contorta</i>	Progressive Containment	Yes

Corsican pine <sup>5</sup>	<i>Pinus nigra</i>	Progressive Containment	Yes
Darwin's barberry*	<i>Berberis darwinii</i>	Site-led	
Egeria	<i>Egeria densa</i>	Exclusion	
False tamarisk	<i>Myricaria germanica</i>	Exclusion	
Gorse	<i>Ulex europeaus</i>	Sustained control	Yes
Gunnera	<i>Gunnera tinctoria</i>	Site-led	
Hornwort	<i>Ceratophyllum demersum</i>	Exclusion	
Lagarosiphon*	<i>Lagarosiphon major</i>	Site-led	
Larch (excl. sterile hybrids) <sup>5</sup>	<i>Larix decidua</i>	Progressive Containment	Yes
Moth plant*	<i>Araujia hortorum</i>	Exclusion	
Mountain pine and dwarf mountain pine <sup>5</sup>	<i>Pinus uncinata</i> <i>Pinus mugo</i>	Progressive Containment	Yes
Nassella tussock*	<i>Nassella trichotoma</i>	Progressive containment	
Nodding thistle	<i>Carduus nutans</i>	Sustained control	Yes
Old man's beard*	<i>Clematis vitalba</i>	Progressive containment	Yes
Perennial nettle	<i>Urtica dioica</i>	Progressive containment	
Ragwort	<i>Senecio jacobaea</i>	Sustained control	Yes
Scots pine <sup>5</sup>	<i>Pinus sylvestris</i>	Progressive Containment	Yes
Spartina	<i>Spartina spp</i>	Progressive containment	
Spiny broom	<i>Calicotome spinosa</i>	Eradication	
Sycamore	<i>Acer pseudoplatanus</i>	Site-led	
Tradescantia*	<i>Tradescantia fluminensis</i>	Site-led	
White-edged nightshade*	<i>Solanum marginatum</i>	Progressive containment	
Wilding conifers <sup>3</sup>	See Table 3	Progressive containment	Yes
Wild Russell lupin <sup>4</sup>	<i>Lupinus polyphyllus</i>	Sustained control	Yes

Animals			
Bennett's wallaby <sup>1,2</sup>	<i>Macropus rufogriseus rufogriseus</i>	Eradication	
Feral cat	<i>Felis catus</i>	Site-led	
Feral deer	<i>Cervus elaphus, C. nippon, C. dama</i>	Site-led	
Feral goat	<i>Capra aegagrus hircus</i>	Site-led	
Feral pig	<i>Sus scrofa</i>	Site-led	
Feral rabbit	<i>Oryctolagus cuniculus</i>	Sustained control	Yes
Hedgehog	<i>Erinaceus europaeus</i>	Site-led	
Mustelids (ferret, stoat, weasel)	<i>Mustelo furo, M. ermine, M. nivalis</i>	Site-led	
Possum	<i>Trichosurus vulpecula</i>	Site-led	
Rat (Norway, ship and Kiore)	<i>Rattus norvegicus, R. rattus, R. exulans</i>	Site-led	
Rook*	<i>Corvus frugilegus</i>	Eradication	

\* Classified as Unwanted Organisms

1. Also included in Site-led programmes.
2. Unwanted Organism status expires 20/09/2021.
3. Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1ha or more of predominantly planted trees. This also excludes planted conifers of less than 1ha, such as windbreaks and shelterbelts existing before March 2019.
4. Wild Russell lupin are Russell lupins that are established by natural means.
5. Does not include specimens used or intended to be used for plantation forestry purposes in a plantation forest.

Table 3: Introduced conifer trees

Common name	Scientific name
Bishops pine	<i>Pinus muricata</i>
Contorta (lodgepole) pine*	<i>Pinus contorta</i>
Corsican pine	<i>Pinus nigra</i>
Douglas fir	<i>Pseudotsuga menziesii</i>
Larch	<i>Larix decidua</i>
Maritime pine	<i>Pinus pinaster</i>

Mountain pine and dwarf mountain pine	<i>Pinus mugo and P.uncinata</i>
Ponderosa pine	<i>Pinus ponderosa</i>
Radiata pine	<i>Pinus radiata</i>
Scots pine	<i>Pinus sylvestris</i>

## 4.2 PEST AGENTS

There are some organisms specified as pest agents in the Plan. These are distinct from other organisms which are classified as pests. Pest agents are defined in the Biosecurity Act:

*Pest agent, in relation to any pest, means any organism capable of-*

(a) *helping the pest replicate, spread, or survive; or*

(b) *interfering with the management of the pest.*

Pest agent rules are included in the Plan to ensure the success of the related pest objectives.

### **Pest agents:**

Russell lupin	<i>Lupinus polypyllus</i>
Pest agent conifer	Means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.

## 4.3 OTHER ORGANISMS THAT MAY BE CONTROLLED

The organisms specified as pests in the Plan are those that are capable of causing ‘*adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga*’.

Section 70(2)(d) of the Act also provides for the specification of ‘*any other organisms intended to be controlled*’ but not accorded pest status. There are many further organisms capable of causing adverse effects, particularly to biodiversity values. A number pose a sufficient future risk to warrant being watch-listed for ongoing surveillance or future control opportunities. These organisms have been categorised as ‘Organisms of Interest’ (OOI). OOIs are not accorded pest status but future control of them could arise, for example through site-led programmes. A review of the Plan may be necessary to include them as pests. However, OOIs may be controlled in other ways in accordance with the Biosecurity Strategy. A list of all OOIs is provided in Appendix 1.



#### 4.4 UNWANTED ORGANISMS

A number of species have been declared nationally as Unwanted Organisms. For the most up-to-date list of Unwanted Organisms, visit the MPI website at <https://www.mpi.govt.nz>.

The National Pest Plant Accord (NPPA) currently targets 113 plant species, all of which are declared Unwanted Organisms. NPPA is a cooperative agreement between the Nursery and Garden Industry Association, regional councils and Government departments with biosecurity responsibilities. It seeks to prevent the sale and/or distribution of the specified plants where either formal or casual horticultural trade is the most significant way of spreading the plants in New Zealand. The most up-to-date list of Accord species is also available on the MPI website.

Unwanted Organism status means that such an organism is prohibited from sale, propagation and distribution in accordance with sections 52 and 53 of the Act. Where this restriction is considered sufficient for their management they are not included as pests in this Plan. However, unwanted organisms may be controlled in other ways in accordance with the Biosecurity Strategy.

## 5. PEST MANAGEMENT FRAMEWORK

### 5.1 OBJECTIVES

Objectives have been set for each pest or class of pests. As required by the NPD, the objectives include:

- the particular adverse effect/s (section 54(a) of the Act) to be addressed;
- the intermediate outcomes of managing the pest;
- the geographic area to which the objective applies;
- the level of outcome, if applicable;
- the period for achieving the outcome; and
- the intended outcome in the first 10 years of the Plan (if the period is greater than 10 years).

### 5.2 PEST MANAGEMENT PROGRAMMES

One or more pest management programme(s) will be used to control pests and any other organisms covered by this Plan. The types of programme are defined by the NPD and reflect outcomes in keeping with the extent of the invasion within the region and whether it is possible to achieve the desired control levels.

The intermediate outcomes for the five programmes are described below.

1. **Exclusion Programme:** to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet established in an area.
2. **Eradication Programme:** to reduce the infestation level of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term.
3. **Progressive Containment Programme:** to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time.
4. **Sustained Control Programme:** to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties.
5. **Site-led Pest Programme:** that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place.

### 5.3 PRINCIPAL MEASURES TO MANAGE PESTS

The principal measures used in the Plan to achieve the objectives are in five main categories. Each category contains a suite of tools to be applied in appropriate circumstances.

## **1. Requirement to Act**

Land owners and/or occupiers or other persons shall be required to act where Plan rules dictate:

- (a) pests are to be controlled;
- (b) management plans are to be prepared and submitted;
- (c) the presence of pests is to be reported;
- (d) actions are to be reported (type, quantity, frequency, location, programme completion); or
- (e) pests are not to be spread (propagated, sold, distributed), and pathways are to be managed (eg, machinery, gravel, animals).

## **2. Council Inspection**

Inspection by Council may include staff:

- (a) visiting properties or doing surveys to determine whether pests are present, or rules and management programmes are complied with, or to identify areas that control programmes will apply to (places of value, exclusion zones, movement control areas);
- (b) managing compliance to regulations (rule enforcement, action on default, prosecution, exemptions);
- (c) taking limited control actions, where doing so is effective and cost efficient; or
- (d) monitoring effectiveness of control.

## **3. Service Delivery**

Council may deliver the service:

- (a) where it is funded to do so within a rating district;
- (b) on a user pays basis;
- (c) by providing control tools, including sourcing and distributing biological agents, or provisions (eg, traps, chemicals).

## **4. Advocacy and Education**

Council may:

- (a) provide general purpose education, advice, awareness and publicity activities to land owners and/or occupiers and the public about pests and pathways (and control of them);
- (b) encourage land owners and/or occupiers to control pests;
- (c) facilitate or fund community and land owners and/or occupier self-help groups and committees;
- (d) help other agencies with control, advocacy, and the sharing or sourcing of funding;

- (e) promote industry requirements and best practice to contractors and land owners and/or occupiers;
- (f) encourage land owners and/or occupiers and other persons to report any pests they find or to control them; or
- (g) facilitate or commission research.

## 5. Collaboration

ORC will collaborate with other agencies and land occupier groups, which may include the development of agreements, for the effective management of pests to protect the values of specific sites, corridors and areas.

### 5.4 RULES

Rules play an integral role in securing many of the pest management outcomes sought by the Plan. They create a safety net to protect land owners and/or occupiers from the effects of the actions or inactions of others where non-regulatory means are inappropriate or do not succeed. Importantly, amendments to the Act arising from the Biosecurity Law Reform Act 2012 now make the Crown bound by those rules identified as **Good Neighbour Rules** (GNR) in regional pest management plans.

Section 73(5) of the Act prescribes the matters that may be addressed by rules, and the need to:

- specify if the rule is to be designated as a ‘Good Neighbour Rule’;
- specify if breaching the rule is an offence under the Act;
- specify if an exemption to the rule, or any part of it, is allowable or not; and
- explain the purpose of the rule.

Rules can apply to owners and/or occupiers or to a person’s actions in general.

The NPD and accompanying guidance notes provide extra requirements to include in the rules of a new GNR. Of particular note, the GNR will:

- (a) identify who the GNR applies to - either all owners and/or occupiers, or a specified class of owner and/or occupier;
- (b) identify the pest to be managed;
- (c) state that the pest must already be present on the owner’s and/or occupier’s land;
- (d) state that the owner and/or occupier of the adjacent or nearby land must, in the view of the management agency, be taking reasonable measures to manage the pest on their land; and
- (e) (if relevant) state the particular values or uses of the neighbouring land that the pest’s spread affects, and that the GNR is intended to address.

## 5.5 COMMUNITY ENGAGEMENT

ORC works with the community to deliver pest management outcomes. This may include acknowledging, working with and supporting the work done by community organisations; and seeking community advice on plan implementation to inform the operational local inspection requirements, information and service delivery needs and identification of new pest issues. Community engagement on site-led initiatives is also another way for the pest objectives to be achieved.

## 6. PEST DESCRIPTIONS AND PROGRAMMES

Section 6 lists the pests to be managed under the Plan under the programme(s) to which they are assigned together with the Plan's objectives and the principal measures to be taken to achieve the objectives.

### 6.1 PESTS TO BE MANAGED UNDER EXCLUSION PROGRAMMES

#### 6.1.1 Introduction

The pests listed in Table 4 below are not known to be present in the Otago region and preventing their establishment is of benefit to the Otago community.

Table 4: Pests to be included in exclusion programmes

Common name	Scientific name
African feather grass	<i>Cenchrus macrourus</i>
Chilean needle grass	<i>Nassella neesiana</i>
Egeria	<i>Egeria Densa</i>
False tamarisk	<i>Myricaria germanica</i>
Hornwort	<i>Ceratophyllum demersum</i>
Moth plant	<i>Araujia hortorum</i>

#### 6.1.2 Description and adverse effects of pests to be managed under exclusion programmes

The characteristics of each pest to be managed through the exclusion programmes, and threats that they pose, are set out in Table 5 below.

Table 5: Characteristics and threats of pests in exclusion programmes

#### Description of the pests and adverse effects

**African feather grass** is a tussock-like grass forming dense clumps up to 2m high. The leaves are whitish green on top, distinctively ribbed, and dark green in colour underneath. The leaf edges feel rough when touched. The leaf sheath is covered in hairs. African feather grass produces fibrous roots and rhizomes that will form new shoots. It flowers from December to April. The flowers form a long narrow spike, straw yellow in colour, and sometimes have a purplish tinge. The seeds have bristles which allow them to become easily attached to clothing, animal hair or wool.

The extensive root system makes it difficult to remove. It produces large amounts of seeds which are easily dispersed by wind and can be carried on clothing. The plant can spread quickly, crowding out other low growing plant species. It can also adversely impact production and economic values.



Source: Weedbusters

**Chilean needle grass** is a tufted perennial plant growing up to 1m. Its leaves are bright green and harsh to the touch. Identification within grazed pasture is difficult. The flowers appear in October, and have a purple tinge and ripen into hard, sharp seeds with long twisting tails. These aid the seed in the penetration of the animal's skin and the soil. It also produces viable seeds in its mid and basal stem regions (cleistogenes).

Plants will grow into dense stands and exclude other indigenous and exotic grassland species. It reduces the livestock carrying capacity of pastures due to the production of masses of unpalatable flower stalks. The sharp penetrating seeds injure livestock and result in the downgrading of wool, skins and hides. The seed can move through an animal's skin into body muscles, causing abscesses and the downgrading of carcasses. Lambs are particularly vulnerable to seeds penetrating their eyes causing blindness.

The point of the seed is extremely sharp and hairy so catches onto passing animals, vehicles, and humans. As a result, it can be transported considerable distances to new sites.

Chilean needle grass can cause adverse effects to pastoral production and economic well-being.



Source: Environment Canterbury

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**Egeria** is a slender, brittle aquatic plant with buoyant stems (3 millimetre diameter). Its linear, dark green leaves (15-30 by 4 millimetres) are in whorls of 4-6. From November to January it produces white flowers (20 millimetre diameter) that are 3-petalled with yellow stamens, that sit on the surface of the water. As only male plants are found in New Zealand, no seed is set, however new plants form from stem fragments which break off. It grows in most still or slow-moving, highly lit submerged sites, and tolerates a wide range of temperatures.



Source: Auckland Council

Large clumps can dislodge from the underwater meadows, causing flooding. Rotting vegetation stagnates water, killing fauna and flora. Egeria has adverse effects on environmental and recreational values. It impacts on other species by crowding them out, affects recreational values and has the potential to cause flooding.

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**False tamarisk** is a deciduous shrub (to 1.5m) with upright branches and small, narrowly triangular leaves (up to 5.5mm x 1.6mm) held close to its branches that appear bluish-green due to salt secretions on the underside. Small, pink, 5-petalled (3.2mm) flowers are in hanging clusters from January and are followed in February and March by small grey capsules containing seeds (0.7-0.9mm). The seeds are spread by wind and water.



Source: A Rebergen

False tamarisk alters the natural environment of stony river beds by reducing the habitat available for birds that nest in braided riverbeds, while also providing cover for the predators that attack them.

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**Hornwort** is a submerged, free-floating or lightly anchored perennial that grows in water up to 16 metres deep. Its stems (30-150 centimetres long) are floating or submerged, branched, stiff and brittle. Thin dark green leaves (1-4 centimetres long) in whorls of 7-12 are densely crowded at the stem tip, increasingly spaced down the stem, and equally forked once or twice into stiff tapering segments with teeth on the outer edge. It produces minute green or white flowers, but is not known to fruit in New Zealand. New plants can form from each piece of the easily broken stems.



Source: Auckland Council

It rapidly invades water of varying clarity, temperature, light and nutrient level. Its dense growth habit crowds out native species, can block waterways, and rotting vegetation stagnates water, killing fauna and flora. This plant threatens most submerged plant communities, adversely affecting the environment and recreational values.

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**Moth plant** is a perennial, broad-leaved, herbaceous climber and can grow to over 5m tall. It has almost-oblong leaves measuring 3-11cm, flowers profusely but fruit set is low. The choko-like fruits, as big as a fist, contain about 400 parachute-like seeds, and mature fruits normally remain for long periods on the vines.



Moth plant can adversely impact environmental and human health values. It climbs over shrubs and small trees, smothering and breaking them down. It also spreads over the ground, smothering native plants of small stature and regenerating seedlings. Both fruits and stems exude a caustic milky sap when crushed or broken. This white latex is sticky, causes skin irritation in susceptible people and is poisonous to humans.

### 6.1.3 Exclusion programmes

The management aims, and the range of methods to be used to accomplish those aims for the pests to be excluded, are set out in Table 6 below.

Table 6: Aims and means of achievement for exclusion programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.1.3</b></p> <p>Over the duration of the Plan, preclude establishment of African feather grass, Chilean needle grass, egeria, false tamarisk, hornwort and moth plant within the Otago region to prevent adverse effects on economic well-being and environmental values<sup>1</sup>.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council <b>inspection, service delivery, advocacy and education and collaboration</b> described in section 5.3 of the Plan will be used to achieve Plan Objective 6.1.3.</p> <p>Otago Regional Council will be responsible for any incursion control of African feather grass, Chilean needle grass, false tamarisk and moth plant should it arise. Otago Regional Council anticipates that any incursion response to egeria and hornwort would be undertaken collaboratively with other parties which could include the Ministry for Primary Industries, Department of Conservation, Land Information New Zealand, and land occupiers. Persons will be encouraged to notify Otago Regional Council of the presence, or possible presence, and location within the Otago region of any of these pests.</p>

#### Advice Note

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

<sup>1</sup> For a definition refer to Glossary.

## 6.2 PESTS TO BE MANAGED UNDER ERADICATION PROGRAMMES

### 6.2.1 Introduction

There are three pests in the Otago region where the infestation levels are low enough to make eradication possible within the 10-year duration of the Plan. These pests are listed in Table 7 below.

Eradicating Bennett's wallaby will be supported by a collaborative approach involving ORC, Environment Canterbury, the Sustainable Farming Fund (led by Landcare Research) and the Ministry of Primary Industries.

In the case of rooks, while preventing rooks from breeding within the duration of the Plan is relatively straightforward, it may take longer to eliminate all remaining birds.


Table 7: Pests to be included in eradication programmes

Common name	Scientific name
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus</i> ,
Rook	<i>Corvus frugilegus</i>
Spiny Broom	<i>Calicotome spinosa</i>

### 6.2.2 Description and adverse effects of pests to be managed under eradication programmes

The characteristics of each pest to be managed through the eradication programmes, and the adverse impacts they cause, are set out in Table 8 below.

Table 8: Characteristics and threats of pests in eradication programmes

Description of the pests and adverse effects	
<p><b>Bennett's wallaby</b>, often called red-necked wallaby, is a marsupial that stands up to 80cm with a tail length around 62cm. Males can reach over 20kg in weight with females reaching 14kg. They have a greyish-brown upper body, pale grey chest and belly and reddish-brown (rufous) colour on the shoulders. Their hind feet and tail are black tipped. Solitary in nature, they commence breeding at about 24 months.</p> <p>Outside of the Otago region, Bennett's wallabies occupy approximately 450,000 hectares of land in South Canterbury, centred in the Hunter Hills, but including the Two Thumb Range, the Kirkleston and the Grampian mountains. Populations also occur in Kakahu Forest near Geraldine and Pioneer Park south-east of Fairlie. However, despite the efforts in Canterbury to contain this species within that region, ingress into North Otago has occurred.</p> <p>Wallabies are capable of causing significant adverse environmental effects. These include preventing the regeneration of native bush, depletion of forest understorey and possible impacts on water quality. They</p>	

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also damage tall tussock grasslands, including the inter-tussock vegetation which can become depleted with a consequent increase in bare ground and higher risk of soil erosion.

Adverse economic effects include damage to pasture with anecdotal evidence of complete clearance of cover in places. There is evidence of wallabies grazing on green feed crops, particularly where these border suitable cover. Wallabies also damage exotic forests, particularly at the establishment stage, with damage being more serious in areas bordering native bush or scrub areas.



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**Rooks** are large, glossy, purplish-black birds. They have a prominent, powerful beak with whitish patches of skin around the base. Highly gregarious, their presence is announced with a distinctive 'kaah', and as they fly they 'caw' to keep in contact with each other. Rooks forage, often up to 20km daily, from either rookeries or communal winter roosts. During breeding (August-January), all birds live in rookeries, often the same sites as used in the previous breeding seasons.



Rooks show a strong preference for foraging in fields of cereals at all stages of the crop, in recently cultivated land, and in stands of walnut trees. The effect of large flocks of rooks is to severely damage or destroy newly emerging crops and pasture.

There are thought to be less than 40 birds remaining in Otago.

Successful control has been achieved through a coordinated approach at times of favourable weather conditions and limited food sources. Unsuccessful control can lead to rooks becoming wary and much more difficult to control. Rookeries can fragment, and new rookeries establish.

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**Spiny broom** is a much-branched spiny shrub <3m tall. Ridged stems with sharp spines. Dark or grey-green leaves, 3 leaflets hairy underneath and may occur in clusters. Bright yellow flowers followed by flattened seedpods.

An invasive plant that is capable of rapidly colonizing and displacing pasture species or disrupting indigenous ecosystems. Spiny broom impacts on conservation values.



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### 6.2.3 Eradication programmes

The management aims and the range of methods to be used to accomplish those aims for the pests to be excluded are set out in Table 9 below.

Table 9: Aims and means of achievement for eradication programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.2.3</b></p> <p>Over the duration of the Plan, reduce all infestations of Bennett’s wallaby, rooks and spiny broom to zero levels within the Otago region to prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>The <b>requirement to act, council inspection, service delivery, advocacy and education and collaboration</b> described in section 5.3 of the Plan will be used to achieve Plan Objective 6.2.3.</p> <p>Otago Regional Council will take responsibility for undertaking the eradication programmes for rooks and spiny broom.</p> <p>For Bennett’s wallaby, control will be a shared responsibility between Otago Regional Council and land occupiers. This will allow flexibility in designing the most effective and efficient control mechanisms to be used.</p> <p>While persons are required to report the presence, or possible presence, and location within the Otago region of Bennett’s wallaby to the Otago Regional Council, persons will also be encouraged to notify Otago Regional Council of the presence of rooks or spiny broom.</p>
<p><b>Plan Rule 6.2.3.1</b></p> <p>Other than under the instruction or supervision of an authorised person, no person shall:</p> <ul style="list-style-type: none"> <li>(a) poison, capture or trap any rook; or</li> <li>(b) discharge any firearm at any rook; or</li> <li>(c) discharge any firearm at or within 500m of any tree containing a rookery; or</li> <li>(d) damage, disturb or interfere in any way with a rookery.</li> </ul> <p>A breach of this rule or any part thereof creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The purpose of this rule is to prevent humans hindering the control of rooks. The birds are wary and require a settled environment for successful control. They are also easily dispersed.</p>
<p><b>Plan Rule 6.2.3.2</b></p> <p>All occupiers within the Otago region shall destroy all Bennett’s wallaby on the land they occupy.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to prevent wallabies from becoming established in the region and causing adverse effects on economic and environmental values.</p> <p>Occupiers are required to control Bennett’s wallaby on their land where this can be undertaken quickly and effectively. However, due to their range and low population numbers in Otago, if an occupier observes a Bennett’s wallaby on their land, but is not able to destroy it, then they are required to report the sighting immediately to Otago Regional Council in accordance with Rule 6.2.3.3 below. Otago Regional Council will then either be able to support the property occupier to destroy the wallaby or undertake the control works itself.</p>

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**Plan Rule 6.2.3.3**

Any person who detects or suspects the presence of Bennett's wallaby, whether dead or alive, within the Otago region, must immediately report the pest's presence and location to the Otago Regional Council.

This is required even if the Bennett's wallaby is destroyed in accordance with the above Rule 6.2.3.2.

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

**Explanation of rule**

The reason for this rule is to assist Otago Regional Council in detecting the presence of any wallabies in order to help the Council to effectively achieve the eradication programme outcomes.

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**Plan Rule 6.2.3.4**

No person, other than an authorised person, shall keep, hold, enclose or otherwise harbour any Bennett's wallaby.

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

**Explanation of rule**

The reason for this rule is to prevent humans actively attempting to establish a wallaby population within the Otago region.

Exemptions to the rule will cater for case-by-case applications to keep wallabies for public benefit, eg. research, zoos, or any other use.

It is in the long-term interests of the region's inhabitants that biodiversity and economic well-being values are protected from the adverse effects brought about by the presence of wallabies.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

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## 6.3 PESTS TO BE MANAGED UNDER PROGRESSIVE CONTAINMENT PROGRAMMES

### 6.3.1 Introduction

There are a number of pests that are well established in the Otago region, but it is still feasible to reduce their present infestation levels through progressive containment programmes. In some cases, the programmes will result in fewer sites infested, or in others, the overall density of the pest will reduce over the 10 year duration period. These pests are listed in Table 10 below.

Table 10: Pests to be included in progressive containment programmes

Common name	Scientific name
<b>Plants</b>	
African love grass	<i>Eragrostis curvula</i>
Bomarea	<i>Bomarea caldasii</i> <i>B. multiflora</i>
Boneseed	<i>Chrysanthemoides monilifera</i>
Bur daisy	<i>Calotis lappulacea</i>

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Cape ivy	<i>Senecio angulatus</i>
Nassella tussock	<i>Nassella trichotoma</i>
Old man's beard	<i>Clematis vitalba</i>
Perennial nettle	<i>Urtica dioica</i>
Spartina	<i>Spartina spp</i>
White-edged nightshade	<i>Solanum marginatum</i>
Wilding conifers <sup>1</sup> , contorta, Corsican, Scots, mountain and dwarf mountain pines and larch	<i>Wilding conifers, Pinus contorta, P. nigra, P. sylvestris, P, uncinata, P, mugo and Larix decidua.</i>

<sup>1</sup> Refer to the definition of Wilding Conifer in the Glossary.

### 6.3.2 Pests to be managed under progressive containment programmes by occupiers

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 11 below.

Table 11: Characteristics and threats of pests in progressive containment programmes

Description of the pests and adverse effects	
Plants	
<p><b>Bomarea</b> is a shade tolerant, multi-stemmed vine that arises from short underground rhizomes, which bear numerous tubers. The flowers are clumped in a dense, pendulous bunch of 15 to 20. The flowers are reddish on the outside and yellow with red spots on the inside and develop into capsules about 2cm in diameter. When ripe, they split open to reveal bright fleshy orange seeds, which can be dispersed over long distances by birds.</p> <p>Known to be present, or has been present, across 650 properties in Dunedin City, Otago Peninsula, and West Harbour areas.</p> <p>An ornamental garden escapee, it invades alongside streams and river banks, shrublands, forest edges, forest remnants and intact low canopy forest. The vines grow into the forest canopy, forming large masses, which overtop and smother supporting trees. Large infestations can alter light levels in forests, kill mature trees and prevent seedlings from establishing.</p>	 
<p><b>Boneseed</b> is an evergreen shrub reaching up to 3m tall. The leaves are dull green, toothed and covered with a cottony down. Daisy-like flowers are produced in bright yellow clusters from late winter until late summer. Up to 50,000 seeds per plant can be produced in one year and can remain viable for up to 10 years. Seed dispersal occurs locally by birds and by water.</p> <p>Boneseed is established in several sites in and around Dunedin including Portsmouth Drive, Forbury, Port Chalmers, and Aramoana and at Taieri Mouth and Moeraki.</p> <p>A tolerance of dry, infertile soils allows boneseed to colonise and establish easily in coastal areas. While thought to be restricted to frost-free areas, that may not be the case. Absence of grazing animals also aids its establishment.</p> <p>Boneseed's vigorous growth will displace desirable plants, shade out native seedlings and reduce or prevent public access to coastal and beach areas. It is highly flammable and will regenerate prolifically after fire. It can cause adverse effects to environmental and recreational values.</p>	 

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**Bur daisy** is a small, perennial herb (up to 40cm tall and 1m in diameter) with many fine, green branches. Its green, thin (almost linear) leaves are fairly insignificant. The plant produces small, pom pom-like clusters of bright yellow flowers for most of the year, but are most prolific over the summer. Flowers develop into very hard, brown burs, covered in tiny hooks.

It is found on one 10 hectare block of land at an active site near Georgetown in the Waitaki Valley.

Bur daisy is a serious threat to pastoral farming, particularly causing wool contamination. Left uncontrolled, bur daisy replaces other plant species. It produces many seeds that are quickly spread by stock movement and remain viable for many years.



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**Cape ivy** is a scrambling perennial, often forming a dense tangled shrub 2-3m tall, with wiry to woody stems that are sparingly branched. Very fleshy, leathery leaves have 1-3 coarse serrations on each side, and the uppermost leaves are smaller, narrower and occasionally smooth edged. Dense clusters of yellow, ragwort-like flowers (11mm diameter) are produced from March to August, followed by fluffy seeds.

The plant produces many long-lived seeds that are dispersed a long way from parent plants. Moderate growth rate and layering stems, scrambles over shrubs and ground, forms dense, tall thickets. Tolerates salt, wind, drought, semi-shade and damage.

It is found mainly in the Dunedin City and Otago Peninsula areas at 65 active sites.

Wind spreads the seed, and seed and fragments are spread in dumped vegetation and soil movement. Cape ivy smothers ground and low-growing plants to 3m tall, forming dense, long-lived mats that prevent the establishment of native plant seedlings. Coastal, rocky areas, cliffs, bush edges, regenerating lowland forests and inshore islands are at risk from this plant.



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**Nassella tussock** is a tufted, perennial, tussock grass with a swollen stem. Its fine, tightly rolled, light green or yellowish-green leaves feel needle-like and very tough when fingers are run along the leaf. The plants are erect when young but slightly drooping with age and grow up to 70cm high and 80cm wide. Flowering usually commences in October and is characterised by purplish tinge. Each mature plant can produce up to 100,000 seeds per year. Roots are deep, matted and fibrous. They have been found growing 1.7m below the soil surface.

Its presence is confined to the Roxburgh, Alexandra, Cardrona and Waitaki Valley areas.





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*Nassella tussock* adversely affects production values due to reduced pasture quality and it also affects environmental values by displacing native species in tussock grassland. It can be difficult to identify amongst other tussocks.



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**Old man's beard** is a deciduous, perennial, climbing, layering vine to 20m tall with very long, woody stems with six prominent ribs (appear as furrows in older vines) and pale, easily rubbed-off bark. Leaves are arranged in opposite pairs on the stems and are made up of five (sometimes three) widely spaced, thin, papery leaflets. Creamy white, fragrant flowers (2-3cm diameter) are produced from December to May, followed by grey, hairy seeds (2-3mm long) with distinctive white plumes (3-4cm long) in dense, fluffy clusters persisting over winter (hence the 'old man's beard'). Native clematis usually has 3 leaflets per stem, smooth stems, and is evergreen. It is found in exotic forest, native forest remnants, shelterbelts and hedgerows, waste ground, on riverbanks and in gardens. The plant is found on 2600 urban properties across the region and is known to occupy several hundred hectares of rural land, riverbeds and margins across the region.



It is capable of smothering and killing all plants to the highest canopy and prevents the establishment of native plant seedlings. Its seeds are both wind and water borne.

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**Perennial nettle** can grow up to 1.5m high. Its stems are woody, its flowers are green and its leaf is a lighter colour green than common stinging nettle (*Urtica urens*). It grows taller than common stinging nettle and it has an extensive system of underground rhizomes, whereas common nettle does not have rhizomes. The seeds are 1-1.5mm long, flat, oval and yellow to greyish in colour. Its underground rhizomes can spread 2.5m in a season. It is a particular problem in South Otago mainly Balclutha, Lawrence and Clydevale (along the Clutha River).



The sting causes itching and burning which may last for several days. Animals shy away from the plant because of its stinging hairs. The pollen from this plant may cause hay fever.

Perennial nettle's extensive system of underground rhizomes, and its ability to form tall dense stands means it can easily invade paddocks and dominate good pasture. It tolerates a wide range of conditions, soil types

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and localities from shade and damp, to very dry. It can be found in pastures, in areas where stock shelter or congregate, waste areas, river banks, roadsides and old house sites.

**Spartina** is a perennial estuarine sward grass, commonly 1m tall and growing in shallow saltwater. It has stiff, upright stems, originating from thick rhizomes. The stems have broad, pointed leaves from their base to the top, where several long fingers contain the seed. New growth occurs from either root pieces or seed. Shoots rapidly sprout from belowground rhizomes, while the seed falls into the water and floats away.

Scattered infestations occur in Pleasant River Estuary, Karitane Estuary, the Lower Taieri Gorge and Catlins Lake.

Colonies of spartina form dense grassy clumps, and these can spread laterally from underground rhizomes, or by over ground side shoots (tillers). Within the estuarine area, vast meadows can form causing a build-up of sediment. This can increase the risk of flooding and also alter the habitat for wading bird species and other estuarine flora and fauna.



**White-edged nightshade** is a quick growing perennial shrub that can grow up to 5m tall. The large woody stems and green oak-shaped leaves are covered in nasty sharp spines. Its leaves have white veins on the upper surface and dense chalky-white hairs on the underside. In summer white or pale mauve flowers bloom in clusters at the end of branches. Green-yellow tomato-shaped berries grow on the ends of prickly stalks.

It is confined to one site near Hampden, but is also known to have existed on Quarantine and Goat Islands in the Otago harbour.

The shrub is well adapted to dry areas. Once established, it forms dense thickets that are impenetrable to stock. It also prevents the establishment of native understory on margins of native bush. White edged nightshade adversely affects economic well-being and environmental values.



The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained (private occupier responsibility) are set out in Table 12 below.

**Table 12: Aim and means of achievement for pests in progressive containment programmes**

<b>Objective, Principal Measures and Rules</b>	
<p><b>Plan Objective 6.3.2</b></p> <p>Over the duration of the Plan progressively contain and reduce the geographic distribution or extent of bomarea, boneseed, bur daisy, cape ivy, nassella tussock, old man’s beard, perennial nettle, spartina and white-edged nightshade at known sites within the Otago region to minimise or prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, advocacy and education, and collaboration</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objective 6.3.2.</p> <p>Generally, occupiers will carry out the necessary control work to remove these plant pests.</p>
<p><b>Plan Rule 6.3.2.1</b></p> <p>All occupiers within the Otago region shall eliminate bomarea infestations on the land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant’s ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.</p>
<p><b>Plan Rule 6.3.2.2</b></p> <p>All occupiers within the Otago region shall, upon receipt of a written notice from an Authorised Person, eliminate boneseed infestations on the land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant’s ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.</p>
<p><b>Plan Rule 6.3.2.3</b></p> <p>All occupiers within the Otago region shall eliminate bur daisy infestations on the land that they occupy.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant’s ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being are minimised.</p>
<p><b>Plan Rule 6.3.2.4</b></p> <p>All occupiers within the Otago region shall eliminate cape ivy infestations on the land that they occupy.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.</p>

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For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

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**Plan Rule 6.3.2.5**

All occupiers within the Otago region shall eliminate nassella tussock infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being and environment values are minimised.

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**Plan Rule 6.3.2.6**

All occupiers within the Otago region shall eliminate old man's beard infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to environment values are minimised.

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**Plan Rule 6.3.2.7**

**Note: This is designated a Good Neighbour Rule**

All occupiers within the Otago region shall, on receipt of a written direction from an Authorised Person, eliminate old man's beard infestations on their land within 20m of the property boundary where the occupier of the adjoining property is eliminating old man's beard infestations within 20m of that boundary with the intention of protecting environmental values.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to manage the spread of old man's beard having unreasonable costs to an adjacent occupier where active old man's beard management is being undertaken by that land occupier.

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

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**Plan Rule 6.3.2.8**

All occupiers within the Otago region shall eliminate perennial nettle infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being are minimised.

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**Plan Rule 6.3.2.9**

All occupiers within the Otago region shall, upon receipt of a written notice from an Authorised Person, eliminate spartina infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic well-being and environment values are minimised.

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**Plan Rule 6.3.2.10**

All occupiers within the Otago region shall eliminate white-edged nightshade infestations on the land that they occupy.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to ensure infestation levels are reduced and threats to economic wellbeing and environment values are minimised.

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.3.3 Pests to be managed under progressive containment programmes by Otago Regional Council

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 13 below.

Table 13: Characteristics and threats of pests in progressive containment programmes

Description of the pests and adverse effects	
Plants	
<p><b>African love grass</b> is a vigorous, clump-forming, perennial grass up to 1.5m tall. It is densely tufted with narrow leaves (harsh to touch) and usually curly at the tips. The leaves are bright green to blue-green (leaves turn bronze-red after a hard frost). Leaf margins rolled inwards and are usually hairless. It has fibrous roots, up to 50cm deep. The flower heads (panicles) are pyramid-shaped with small, white flowers. Its blackish, olive-purple seeds are attached to arching stems over 1m long.</p> <p>Infestations are limited to 20 active sites across the Otago region. The plant is capable of rapidly invading bare and disturbed sites. Once established, it forms dense stands and suppresses other herbaceous species. It is a prolific seeder, has low palatability for grazing animals and is difficult to detect.</p>	

The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained (ORC responsibility) are set out in Table 14 below.

Table 14: Aim and means of achievement for pests in progressive containment programmes

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.3.3</b></p> <p>Over the duration of the Plan, progressively contain and reduce the geographic distribution or extent of African love grass at known sites (as shown on Map 1 in Appendix 3) within the Otago region to minimise or prevent adverse effects on economic well-being and the environment.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objective 6.3.3.</p> <p>Generally, Otago Regional Council will carry out the necessary control work to remove African love grass. It is useful however for occupiers to report the presence of African love grass at sites outside of the known sites.</p>
<p><b>Advice Note</b></p> <p>Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.</p>	

### 6.3.4 Progressive containment programme for wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch

The characteristics of wilding conifers to be managed under this programme, and adverse effects that they pose, are set out in Table 15 below.

Table 15: Characteristics and threats of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch

#### Description of the pest and adverse effects

**Wilding conifers** can have significant impacts on native ecosystems, particularly those with low-stature vegetation<sup>2</sup>. Wilding conifers grow faster and taller than low-stature native plants and so can shade out many of these species. Where there is dense wilding conifer growth, this can lead to local extinction of native plant communities, the drying of wetlands and riparian areas, and resulting impacts on native fauna through the loss of habitat. Soil and soil fauna are also altered when wilding conifers replace native ecosystems.

Otago's iconic landscape is vulnerable to the invasion of wilding conifers. If not controlled, they would significantly change the landscape and impact on our recreational, hydrological and conservation values. Particularly at risk is our high country and tussock grasslands. The growing problem has been recognised for some years, and as a result, the Wakatipu Wilding Conifer Control Group and the Central Otago Wilding Control Group established themselves solely to fight wilding conifers.

A National Wilding Conifer Control Programme has been developed and funded by government agencies, landowners, and local communities to address infestations. The extent within Otago ranges from very dense wilding infestations in the Wakatipu area, through to very low wilding conifer numbers scattered over thousands of hectares. Control efforts to date have been very successful where the work has been carried out, but will require an ongoing effort for many years to come in follow-up work, and in areas where control is yet to be undertaken. The seed source for spread is in some cases from planted conifers in the form of shelterbelts and forestry plantations.

Most wilding conifer species do not pose a significant threat to established native forests, however some species are adapting to new areas and in particular, Douglas fir has a higher shade tolerance than other introduced conifer species and can consequently spread into shrublands, regenerating native forest and mature



<sup>2</sup> Indigenous ecosystems at particular risk from wilding conifer invasion include: tussock and other indigenous grasslands, alpine ecosystems, subalpine and dryland scrub and shrublands, frost-flats, wetlands, turf communities, geothermal areas, dunelands, ultramafic/serpentine areas, rockfields and herbfields, riparian areas, coastal margins, bluffs and cliffs.

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forest where there are canopy gaps and a relatively sparse understory.

Wilding conifers can adversely affect amenity and landscape values, particularly where the valued landscapes are characterised by extensive low-stature vegetation such as high country tussock grasslands. These landscapes are important for tourism and large-scale landscape changes could impact on this. Dense wilding conifer spread can impact water availability lead to the blocking and/or changing of valued views and vistas, and can impede access to, and enjoyment of, recreational areas.

In areas where there is long-term, seasonal soil moisture deficits, dense wilding conifers can contribute to reductions in surface water flows, potentially impacting on water availability and aquatic ecosystems. Wilding conifers can also increase the risk posed by wild fires.

In areas of extensive pastoral farming, wilding conifer infestations adversely impact economic well-being by reducing available grazing land and limiting future land use options due to the high costs of control.

#### **Contorta (lodgepole) pine, Corsican pine, Scots pine, dwarf mountain pine, mountain pine and larch**

In addition to the adverse effects listed above for the wilding offspring of these conifers, wilding conifers often occur as a result of seed spread from planted conifer trees. It can be difficult to successfully control or manage the spread of wilding conifers over the long term if the seed source is not removed or appropriately managed and contained. This set of conifers has ~~very~~ limited commercial value and they are also highly invasive. It is therefore appropriate to specify these organisms as pests in their own right, in addition to being pests under the wilding conifer definition in their naturally regenerated state. As set out in Tables 2 and 3 it would effectively prevent new plantings of these species, and ensure where these species are cleared using publicly funded control operations that they stay clear.

Contorta in particular, is an unwanted organism, is the most invasive introduced conifer species and represents a significant proportion of all wilding conifers and original sources of wilding conifer spread.

#### **Existing planted conifers less than 1ha**

Existing contorta shelter belts and other conifer shelterbelts are often used to provide shelter for stock.

It can be difficult to successfully control or manage the spread of wilding conifers over the long-term if the existing planted seed sources are not removed or appropriately managed and contained. The Plan does not include rules requiring the removal of existing shelter belts and other existing planted conifers less than 1ha. Rather, transition arrangements for their long-term removal, starting with the removal of contorta shelter belts, are outlined in the Biosecurity Strategy.



The management aims and the range of methods to be used to accomplish those aims for the pests to be progressively contained are set out in Table 16 below.

**Table 16: Aim and means of achievement for wilding conifer progressive containment programmes**

<b>Objective, Principal Measures and Rules</b>	
<p><b>Plan Objective 6.3.4</b></p> <p>Over the duration of the Plan, progressively contain and reduce the geographic extent of wilding conifers<sup>3</sup> within the Otago Region to minimise adverse effects on economic well-being and the environment. This may involve the destruction of contorta, Corsican, Scots, mountain and dwarf mountain pines and larch.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, collaboration, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the Plan may be used by Otago Regional Council to achieve Plan Objective 6.3.4.</p> <p>Plan Objective 6.3.4 is also achieved under The National Wilding Conifer Control Programme – a collaborative funding model for wilding conifer control. Parties to this programme could include the Ministry for Primary Industries, Department of Conservation, Land Information New Zealand, Otago Regional Council and private land holders.</p>
<p><b>Plan Rule 6.3.4.1</b></p> <p>Within the Otago Region occupiers shall destroy all wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch present on land that they occupy prior to cone bearing, if –</p> <ol style="list-style-type: none"> <li>the wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines, and/or larch are located within an area which has had control operations carried out to destroy wilding conifers since January 2016; and</li> <li>the control operations were publicly funded (either in full or in part).</li> </ol> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The purpose of this rule is to ensure that reinfestations of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch are prevented from establishing at sites where wilding conifers have previously been destroyed through publicly funded control operations.</p>
<p><b>Plan Rule 6.3.4.2</b></p> <p>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</p>	<p><b>Explanation of rule</b></p> <p>Over the duration of the Plan, to ensure that the spread of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch does not cause unreasonable costs to the occupiers of adjoining properties, where wilding conifers, contorta, Corsican, Scots,</p>

<sup>3</sup> Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1ha or more of predominantly planted trees. This also excludes existing planted conifers of less than 1ha, such as windbreaks and shelterbelts existing before March 2019.

<p>adjoining property boundary prior to cone bearing, if –</p> <ol style="list-style-type: none"> <li>wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property; and</li> <li>the control operations on the adjoining property were within 200m of the boundary and were undertaken since January 2016.</li> </ol> <p>A breach of this rule or any part thereof creates an offence under section 154N(19) of the Act.</p>	<p>mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property.</p>
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#### **Plan Rule 6.3.4.3**

##### **Note: This is designated a Good Neighbour Rule**

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 –

- the adjoining land has previously been cleared through control operations since January 2016; and
- the occupier of that adjoining land is taking reasonable steps to manage wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch on their land, within 200m of the boundary.

A breach of this rule creates an offence under section 154N(19) of the Act

#### **Explanation of rule**

Over the duration of the Plan, to ensure that the spread of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch does not cause unreasonable costs to the occupiers of adjoining properties, where wilding conifers have previously been destroyed through control operations on the adjoining property and the adjoining occupier is undertaking active wilding conifer management.

The rule is required in addition to Plan Rule 6.4.3.2 as the National Policy Direction requires that before a rule can be identified as a good neighbour rule, the Otago Regional Council must be satisfied that the adjacent occupier is taking reasonable measures to manage the pest or its impacts.

#### **Plan Rule 6.3.4.4**

##### **Note: This is a pest agent rule**

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 –

- wilding conifers; contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch have previously been destroyed through control operations on the adjoining property; and
- the control operations on the adjoining property were within 200m of the boundary and were undertaken since January 2016.

#### **Explanation of rule**

Introduced conifer species are capable of contributing toward the establishment and 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 and contorta, Corsican, Scots, mountain or dwarf mountain pines, larch and/or other planted conifer species 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.

#### **For the purpose of this rule**

**Pest Agent Conifer** means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.

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**Plantation forest** means a forest deliberately established for commercial purposes, being at least 1 hectare of continuous forest cover of forest species that has been planted and has or will be harvested or replanted.

**Forest species** means a tree species capable of reaching at least 5 metres in height at maturity where it is located.

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

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**Advice Notes**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

Occupiers may make an application to the Otago Regional Council for an exemption from the rules under section 78 of the Biosecurity Act 1993. This section should be referred to in full in the Act.

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## 6.4 PESTS TO BE MANAGED UNDER SUSTAINED CONTROL PROGRAMMES

### 6.4.1 Introduction

There are a number of pests that are securely established in the Otago region and therefore containing their presence is the most appropriate form of management. In some cases, spread from infested areas across property boundaries to neighbouring areas that are clear or being cleared will be prevented eg. gorse or nodding thistle. For others it is a case of holding population levels to acceptable limits eg. feral rabbits. The pests that are subject to sustained control programmes are listed in Table 17 below.


Table 17: Pests to be included in sustained control programmes

Common name	Scientific name
<b>Plants</b>	
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>
Gorse	<i>Ulex europeaus</i>
Nodding thistle	<i>Carduus nutans</i>
Ragwort	<i>Senicio jacobaea</i>
Wild Russell lupin	<i>Lupinus polyphyllus</i>
<b>Animals</b>	
Feral rabbits	<i>Oryctolagus cuniculus</i>

### 6.4.2 Description and adverse effects of pests to be managed under sustained control programmes

The characteristics of each of the plant pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 18 below.

Table 18: Characteristics and threats of pests in sustained control programmes

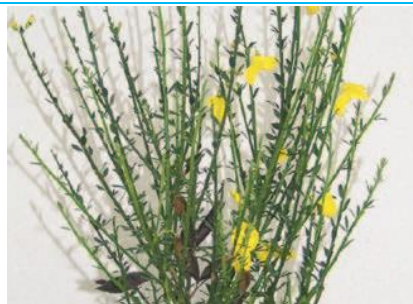
Description of the pests and adverse effects	
<p><b>Broom</b> (common) is a leguminous, branched perennial shrub up to 2.5m tall with bright yellow flowers. Stems are green and woody, five ribbed and hairless. Montpellier broom, while somewhat smaller in stature, except for slightly smaller yellow flowers, is very difficult to distinguish from common broom. They are therefore treated together. Dark ripened seedpods explode during summer, propelling hard seed up to 5m from the parent plant. The seed may also land on stock, particularly sheep, or in water and be transported much further. Seed can remain viable for many years (&gt;50 years) in soil and gravel. Transport of such infested material can contribute to spread over longer distances.</p>	

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Broom is capable of establishing on land throughout the region. However, large areas of Central Otago and the Queenstown Lakes are predominantly clear of infestations. Where it is present, density varies from light to heavy depending upon the intensity of grazing management. It is most prevalent on lightly grazed or non-grazed areas.

Broom seedlings are unable to compete with productive pasture. Where insufficient grazing pressure is exerted, the plants can establish dense stands that can shade out most other herbaceous species and destroy pasture.

Provided taller tree species can become established within broom colonies, they will eventually displace broom.



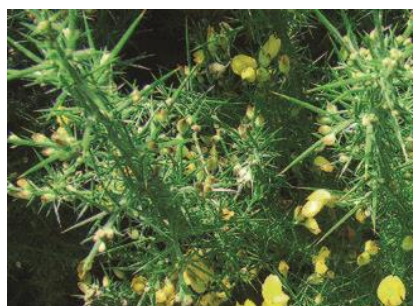
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**Gorse** is a sharply spinous, woody, deeply rooted, leguminous perennial shrub. It grows up to 4m tall with thick stems. Seeds can be ejected up to 5m from pods and the plant may seed twice a year. Seed may survive in the soil for more than 50 years.

Gorse is capable of establishing on land throughout the region. However, large areas of Central Otago and the Queenstown Lakes are predominantly clear of infestations. Density varies from light to heavy depending upon the intensity of grazing management. It is most prevalent on lightly grazed and non-grazed areas.

Gorse forms dense thickets that prevent stock from grazing infested areas. Seed may be spread by water, birds, road-making, gravel extractions, animals and machinery.

It is generally perceived as a threat to pastoral values and low stature indigenous vegetation. However, if left undisturbed and in the presence of a seed source, tall indigenous vegetation particularly can overtop and suppress gorse.



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**Nodding thistle** is an annual or biennial thistle that grows from an over-wintering rosette and is similar to the Scotch thistle, although more erect and spiny. Its flowering stems grow up to 1.5m high bearing large crimson flower heads that droop or “nod” when mature.

Nodding thistle is found on sheep farming areas in many parts of Otago. A single mature plant is capable of producing up to 10,000 seeds. It is not readily grazed because of its spiny foliage. Single rosettes can occupy an area greater than one square metre, so large infestations can seriously reduce the stock carrying capacity of affected pasture. The plant is resistant to drought and seed can remain viable for up to 20 years.



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**Ragwort** is an erect biennial or perennial herb that is commonly 45-60cm tall but can grow to almost 2m high. It produces bright yellow flowers in clusters, from November to April.

The plant is toxic to grazing cattle, deer and horses because its poisonous alkaloids cause liver cirrhosis, photosensitisation, jaundice and wasting. Poisoned animals may take some months to die. They do however electively avoid grazing it.

Sheep will eat Ragwort without any apparent adverse effects, unless they are continually exposed to it in large quantities, or if they are not used to feeding on it.

It can dominate pasture once established, almost completely excluding other pasture species in the worst instances, and significantly reducing the amount of grazing available to stock. Also, the plant is invasive in riverbeds, disturbed forest and shrubland, coastal areas, bare land and other short-stature vegetation types. It forms dense stands in these areas as it does in pasture. However, it usually disappears when a canopy forms, which decreases light levels reaching the ground layer.



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**Russell lupin** is a quick growing perennial herb, up to 1m tall, with multiple, erect, hairy stems with clusters of 8-15 leaflets (3-13 x 1-3cm) that are usually hairless above and silky below. Produces an erect flowerhead spike (15-60cm long) bearing many slightly scented and multiple coloured flowers (12-20mm) from September to February. The plant produces a large amount of mottled dark brown seed that are spread mainly by water and also by humans distributing them along roadsides. The seed remains viable for many years.

Russell lupin tolerates wind, warm to cold, flooding and drought, low fertility (fixes nitrogen) and fire. Intolerant of moderate shade. It rapidly invades shingly braided river systems and the dense, self-replacing stands provide hiding places for predators of the (often endangered) birds that would usually nest safely on these bare islands. The dense infestations also interfere with water flow along these rivers, changing the ecosystem for the birds and aquatic species that rely on this habitat. Increased soil nitrogen may induce change in species composition in plant communities from low fertility species to weed species. Causes sand and gravel to build up, altering shape of rivers and contributing to flooding and erosion. Increased cover may prevent some birds (eg. dotterels, wrybills) nesting, and may increase predation by cats, mustelids, etc. on birds.

Disturbed lowland and sub-alpine shrubland, short tussock-land and wetlands are susceptible to invasion.



### 6.4.3 Sustained control programme for broom and gorse

The management aims and the range of methods to be used to accomplish the aims for broom to be managed under the sustained control programme in Otago is set out in Table 19 below.

Table 19: Aim and means of achievement for sustained control of gorse and broom

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.3</b></p> <p>Over the duration of the Plan, implement sustained control of broom and gorse to ensure land that is free of, or being cleared of, broom and gorse does not become infested, to prevent adverse effects on production values and economic well-being.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, collaboration, service delivery, advocacy and education, and collaboration</b> described in section 5.3 of the Plan may be used by Otago Regional Council to achieve Plan Objective 6.4.3.</p> <p>Generally, occupiers will be responsible for control of broom although Otago Regional Council may provide some assistance e.g. sourcing and releasing biological control agents.</p>
<p><b>Plan Rule 6.4.3.1</b></p> <p>All occupiers within the Gorse and Broom Free Areas as shown on Map 2 in Appendix 3 shall, eliminate all broom infestations on the land that they occupy.</p> <p>This rule shall not have legal effect within the New Gorse and Broom Free Areas as illustrated on Map 2 in Appendix 3 until 31 October 2024.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to maintain the past investment by occupiers in establishing areas clear of broom within properties.</p> <p>Otago Regional Council will proactively support all land occupiers within the New Gorse and Broom Free Areas to clear these areas prior to Rule 6.4.3.1 having legal effect from 31 October 2024.</p>
<p><b>Plan Rule 6.4.3.2</b></p> <p><b>Note: This is designated a Good Neighbour Rule</b></p> <p>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 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 and/or environmental values.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to manage the spread of broom causing unreasonable costs to an adjacent occupier where active broom management is being undertaken by that land occupier.</p> <p>Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier.</p>

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**Plan Rule 6.4.3.3**

All occupiers within the New Gorse and Broom Free Areas as shown on Map 2 in Appendix 3 shall eliminate all gorse infestations on the land that they occupy.

This rule shall not have legal effect for the New Gorse and Broom Free Areas as shown on Map 2 in Appendix 3 until 31 October 2024.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to maintain the past investment by occupiers in establishing areas clear of gorse within properties.

Otago Regional Council will proactively support all land occupiers within the New Gorse and Broom Free Areas to clear these areas prior to Rule 6.4.3.3 having legal effect from 31 October 2024.

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**Plan Rule 6.4.3.4****Note: This is designated a Good Neighbour Rule**

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 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 and/or environmental values.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.

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

**Explanation of rule**

The reason for this rule is to manage the spread of broom causing unreasonable costs to an adjacent occupier where active broom management is being undertaken by that land occupier.

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

#### 6.4.4 Sustained control programmes for nodding thistle and ragwort

The management aims and the range of methods to be used to accomplish the aims for nodding thistle and ragwort to be managed under the sustained control programme in Otago is set out in Table 20 below.

Table 20: Aims and means of achievement for the sustained control of nodding thistle and ragwort (boundary control)

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**Objective, Principal Measures and Rules****Plan Objective 6.4.4**

Over the duration of the Plan, implement sustained control of nodding thistle and ragwort on rural zoned land within specified distances of property boundaries throughout the Otago region to prevent their spread in order to minimise adverse effects on production values and economic well-being.

**Principal measures to be used**

Appropriate measures drawn from the suite of activities listed under **requirement to act, collaboration, council inspection, advocacy and education** described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Plan Objective 6.4.4.



<p><b>Plan Rule 6.4.4.1</b></p> <p><b>Note: This is designated a Good Neighbour Rule</b></p> <p>All occupiers in the Otago region on rural zoned land shall eliminate nodding thistle infestations on their land within 100m of the property boundary where the occupier of the adjoining property is eliminating nodding thistle infestations within 100m of that boundary.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to manage the spread of nodding thistle causing unreasonable costs to an adjacent occupier who is undertaking active nodding thistle management within 100m of their property boundary.</p> <p>Any action pertaining to non-compliance will only be initiated upon a complaint from the adjoining affected occupier.</p>
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<p><b>Plan Rule 6.4.4.2</b></p> <p><b>Note: This is designated a Good Neighbour Rule</b></p> <p>All occupiers in the Otago region on rural zoned land shall eliminate ragwort infestations on their land within 50m of the property boundary where the occupier of the adjoining property is eliminating ragwort infestations within 50m of that boundary.</p> <p>For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set viable seed.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to manage the spread of ragwort causing unreasonable costs to an adjacent occupier who is undertaking active ragwort management within 50m of their property boundary.</p> <p>Any action pertaining to non-compliance will only be initiated upon a complaint from the adjoining affected occupier.</p>
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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Act.

#### 6.4.5 Sustained control programme for Russell lupin

The management aims and the range of methods to be used to accomplish the aims for Russell lupin to be managed under the sustained control programme in Otago as set out in Table 21 below.

Table 21: Aims and means of achievement for the sustained control of wild Russell lupin

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.5</b></p> <p>Over the duration of the Plan, implement sustained control of the extent of Russell lupin and wild Russell lupin within specified distances from waterways and property boundaries to preclude establishment of wild Russell lupin and to prevent adverse effects on environmental values.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, service delivery, advocacy and education, and collaboration</b> described in section 5.3 of the Plan will be used to achieve Plan Objective 6.4.5.</p>

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**Plan Rule 6.4.5.1****Note: This is a pest agent rule**

On rural zoned land within the Otago region, no Russell lupin shall be planted within:

- (a) 200m of the outer gravel margin of a braided river as measured at the time of planting, or if there is no outer gravel margin beyond the active channel, 200m from the edge of the active channel of a braided river;
- (b) 50m from any non-braided river; except where this may be reduced to 10m from any intermittent non-braided river which is not located within an at-risk catchment and the planting is in accordance with a certified Russell Lupin Management Plan;
- (c) 10m from any artificial watercourse; or
- (d) 10m from an adjoining property boundary.

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

**Explanation of rule**

The reason for this rule is to prevent wild Russell lupin establishing within the specified distances from waterways and adjoining property boundaries.

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For the purpose of Rules 6.4.5.1-3:

**Artificial watercourse** means a watercourse that is created by human action. It includes an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal channel. It does not include artificial swales, kerb and channelling or other watercourses designed to convey stormwater.

**Braided river** means any river with multiple, successively divergent and rejoining channels separated by gravel islands.

**Non-braided river** means a continually or intermittently flowing body of fresh water that is not a braided river; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).

**River** means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).

**At risk catchment** means the Dart, Rees, Matukituki, Makarora, Hunter and Shotover (downstream of Arthurs point) river catchments.

**Russell Lupin Management Plan** means a management plan prepared by an occupier, and certified by the Council, which:

- Identifies all rivers on a property, including all intermittent rivers of a property where the property occupier may plant Russell lupin up to 10m from the river; and
- Identifies where Russell lupin may be planted on a property; and
- provides information on how the sowing of Russell lupins on the property will avoid encroaching within the identified 10m setback areas; and
- provides information on the ongoing farm management practices that will be applied to avoid Russell lupin spreading into the identified 10m setback areas.

The Russell Lupin Management Plan must be submitted to the Otago Regional Council at least 90 working days prior to planting for certification that it contains the matters listed above and does not compromise the achievement of Plan Objective 6.4.5.

When certifying the Russell Lupin Management Plan the Otago Regional Council shall consider:

- The extent to which the sowing and farm management practices proposed will avoid the spread of Russell lupins in and along rivers;
- The intermittence of the river (how frequently the river flows);
- The aquatic species that may be present in the river or downstream of the river;
- The bird habitat provided by the river or downstream of the river; and
- Any other environmental values associated with the river or downstream of the river.

The maximum duration of a Russell Lupin Management Plan is 10 years.

A Russell Lupin Management Plan may be reviewed by the ORC at any time for the purposes of ensuring that the achievement of Plan Objective 6.4.5 is not compromised.

A Russell Lupin Management Plan may also be reviewed by the occupier at any time. Any amendments resulting from the review that are more than minor must be certified by the Council prior to implementation.

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#### **Plan Rule 6.4.5.2**

All occupiers on rural zoned land within the Otago region shall eliminate all wild Russell lupin within:

- 200m of the outer gravel margin of a braided river, or if there is no outer gravel margin beyond the active channel, 200m from the edge of the active channel of a braided river;
- 50m from any non-braided river;
- 10m from any artificial watercourse; or
- 10m from an adjoining property boundary.

For the purpose of this rule, eliminate means the permanent preclusion of the plant's ability to set seed.

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

#### **Explanation of rule**

The reason for this rule is to prevent wild Russell lupin establishing and seeding within the specified distances from waterways and adjoining property boundaries.

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#### **Plan Rule 6.4.5.3**

##### **Note: This is designated a Good Neighbour Rule**

All occupiers on rural zoned land and crown owned and public conservation estate land within the Otago Region shall, on receipt of a written notice of direction from an Authorised Person, eliminate all wild Russell lupin within 10m of the property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate wild Russell lupin within 10m of that boundary.

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

#### **Explanation of rule**

The purpose of this rule is to manage the spread of wild Russell lupin causing unreasonable costs to an adjacent occupier where active wild Russell lupin management is being undertaken by that land occupier.

#### 6.4.6 Sustained control programme for feral rabbits

The characteristics of feral rabbits to be managed under sustained control, and adverse effects that they pose, are set out in Table 22 below.

Table 22: Characteristics and threats of feral rabbits under a sustained control programme.

##### Description of the pests and adverse effects

**Feral rabbits** (wild European) are a small mammalian herbivore, grey-brown (or sometimes black) in colour ranging in length from 34 to 50cm and weighing approximately 1.1 to 2.5kg. They have a high capacity for reproduction and females may be pregnant for 70% of a year. Early-born does may breed in their natal year. They can produce a total of 20 – 50 young per adult doe. Females are also capable of adjusting litter sizes to food supply, so rabbit populations are capable of rebounding quickly from natural disasters or control pressures.

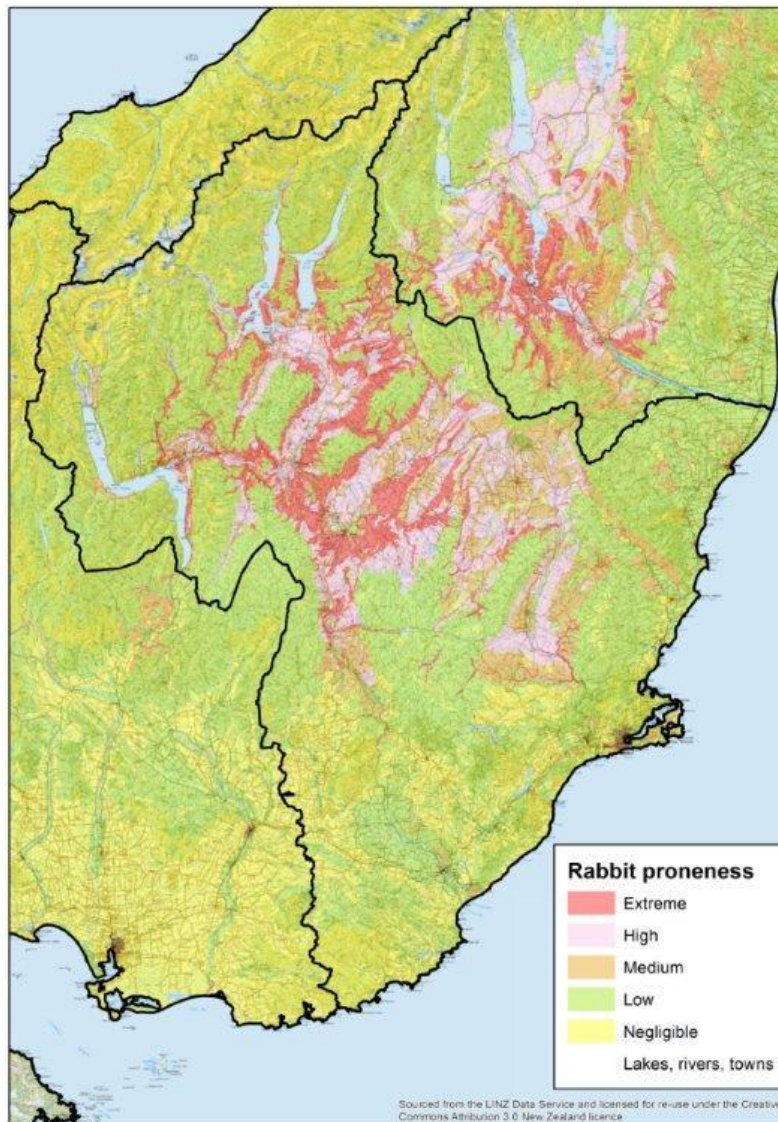
The rabbits' preferred habitat is grassland below about 1000m altitude, with free draining soils, sunny aspect, and less than 1000mm annual rainfall. They are common throughout the rural areas of the region with such habitat but may also be found in and around lifestyle blocks, rural townships and urban areas. Refer to the rabbit proneness map below (Figure 5) for more information on their distribution in Otago.

Rabbit Haemorrhagic Disease (RHD) is capable of significantly reducing population levels. However, over time, surviving populations become increasingly resistant to the disease. It is therefore important that alternative control techniques continue to be employed by land occupiers in tandem with RHD to minimise resistant build up. A further RHD strain (K5) has been released during the autumn of 2018.

In general, rabbits compete for pasture and crops with other farm animals and cause land degradation. Rabbits also graze on native vegetation, impacting ecological values. Loss of vegetation reduces soil organic matter, and soils with low organic matter have reduced water-holding capacity and permeability, and therefore reduced soil fertility. Rabbit grazing can also cause soil erosion and stream bank erosion, which can in turn affect water quality. Rabbits may affect native invertebrates and birds by causing changes to habitat and altering predator-prey relationships.



Figure 5: Rabbit proneness in Otago



The management aim and the methods to be used to achieve that aim are set out in Table 23 below.

Table 23: Aim and means of achievement for sustained control of feral rabbits

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.4.6</b></p> <p>Over the duration of the Plan, implement sustained control of feral rabbits to ensure population levels do not exceed Level 3 on the Modified McLean Scale<sup>4</sup> in order to minimise adverse effects on production and environmental values within the Otago region.</p>	<p><b>Principal measures to be used</b></p> <p>Appropriate measures drawn from the suite of activities listed under <b>requirement to act, council inspection, advocacy and education</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objective 6.4.6.</p>

<sup>4</sup> Refer Appendix 2 for Modified McLean Scale.

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Exemptions may be granted in appropriate circumstances where these meet the criteria in accordance with section 78 of the Act.

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**Plan Rule 6.4.6.1**

An occupier within the Otago region shall control feral rabbit densities on the land they occupy to at or below Level 3 on the Modified McLean Scale.

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

**Explanation of rule**

The reason for this rule is to maintain the population levels of feral rabbits to that which prevents adverse effects on the economic values of occupiers, and in so doing, prevent the possible adverse effects on wider environmental values.

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**Plan Rule 6.4.6.2**

**Note: This is designated a Good Neighbour Rule**

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 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 that boundary.

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

**Explanation of rule**

The reason for this rule is to manage the spread of feral rabbits causing unreasonable costs to the adjacent occupier where active feral rabbit management is being undertaken by that occupier.

Any written direction pertaining to non-compliance will only be initiated upon a complaint from the adjoining affected occupier.

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**Plan Rule 6.4.6.3**

Other than under the instruction or supervision of an Authorised Person, no person shall discharge a firearm within or across a property prior to a control operation involving bait or where a control operation involving bait is being undertaken on the property to manage feral rabbits.

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

**Explanation of rule**

The purpose of this rule is to prevent human interference prior to any necessary control operations by Otago Regional Council.

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## 6.5 PESTS TO BE MANAGED UNDER SITE-LED PROGRAMMES

### 6.5.1 Introduction

Site-led programmes seek to manage pests whose presence, at or nearby, threaten the values that are special to particular sites (protecting the values at the place). The sites themselves can be determined in two main ways. In the first instance, there are sites within the Otago region that have already been identified through a variety of ways at a district or local scale as having particular values, primarily non-production. In the second instance, there is opportunity for individuals or community groups to promote and pursue further sites that they consider hold values of importance to those people.

Sites managed through site-led programmes may range in extent from small areas within a property to larger areas covering thousands of hectares. Likewise, their values can be threatened by individual or multiple organisms and pest management regimes specifically tailored to each site will be necessary.

This Plan identifies three sites that manage a range of species encompassing the geographic areas of the Otago Peninsula, West Harbour – Mt. Cargill, and Quarantine and Goat Islands (Map 3 of Appendix 3).

The Plan also identifies a site-led programme for the management of lagarosiphon in specified lakes and rivers (Map 5 of Appendix 3).

### 6.5.2 Site-Led Programmes

The **Otago Peninsula** is 9,000ha in area and stretches parallel to the Dunedin mainland along the southeast of the Otago Harbour. It joins to the mainland at its southwest end by a narrow isthmus of approximately 1.5km. The Otago Peninsula is home to a number of rare and threatened indigenous species including the yellow-eyed penguin, the New Zealand Sealion, the northern Royal Albatross, and is home to many other indigenous bird, reptile and invertebrate species. Its forest remnants are important habitats.

The **West Harbour – Mt. Cargill area** is an area of approximately 12,500ha north of Dunedin City following the western side of the Otago Harbour, extending from Mt. Cargill and Ravensbourne to Blueskin Bay, Long Beach and Aramoana. This area is home to 11 different ecosystem types containing diverse indigenous flora and fauna. This includes threatened and at-risk plant species, including nationally critical, endangered and at-risk bryophytes. The area is home to rare and threatened indigenous species including the yellow-eyed penguin, the New Zealand sea lion, and many other at-risk and threatened shore birds. It is also home to many other indigenous bird, reptile and invertebrate species, including the South Island kākā, South Island robin, and South Island fern bird.

**Quarantine and Goat Islands** / Kamau Taurua and Goat Island are located within the Otago Harbour between Port Chalmers within the West Harbour – Mt. Cargill area on the western side of the harbour and Portobello on the Otago Peninsula on the eastern side of the harbour. The island provides a stepping stone between these two areas.

The **Lagarosiphon** site-led programme supports the management of lagarosiphon within Lake Wanaka and the Kawarau River, Lake Dunstan and to preclude the re-establishment of lagarosiphon in Lake Wakatipu, and to prevent spread from infested waterways to protect environmental, recreational and amenity values.

More information on these site-led areas and ORC's role in their management is available in the Biosecurity Strategy.

Table 24: Pests and their applicable sites (\*) being managed under site-led programmes

Common name	Scientific name	Otago Peninsula	West Harbour – Mt. Cargill	Quarantine and Goat Islands	Lagarosiphon Management Areas
<b>Plants</b>					
Banana passionfruit	<i>Passiflora tripartita</i> var <i>mollissima</i> <i>P. tripartita</i> var <i>azuayansis</i> <i>P. tarminiana</i> <i>P. pinnatistipula</i> <i>Passiflora x rosea</i> <i>P. caerulea</i>	*	*	*	
Chilean flame creeper	<i>Tropaeolum speciosum</i>	*	*	*	
Darwin's barberry	<i>Berberis darwinii</i>	*	*	*	
Sycamore	<i>Acer pseudoplatanus</i>	*	*	*	
Gunnera	<i>Gunnera tinctoria</i>	*	*	*	
Tradescantia (wandering willie)	<i>Tradescantia fluminensis</i>	*	*	*	
Lagarosiphon	<i>Lagarosiphon major</i>				*
<b>Animals</b>					
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus</i>	*	*	*	
Feral cat	<i>Felis catus</i>	*	*	*	
Feral deer (incl. hybrids)	<i>Cervus elaphus</i> , <i>C. nippon</i> , <i>C. dama</i>	*	*	*	
Feral goat	<i>Capra aegagrus hircus</i>	*	*	*	
Feral pig	<i>Sus scrofa</i>	*	*	*	
Hedgehog	<i>Erinaceus europaeus</i>	*	*	*	





Mustelids (ferret, stoat, weasel)	<i>Mustelo furo, M. ermine, M. nivalis</i>	*	*	*
Possum	<i>Trichosurus vulpecula</i>	*	*	*
Rat (Norway, ship and Kiore)	<i>Rattus norvegicus, R. rattus R. exulans</i>	*	*	*

Note – In addition, if any other pest contained in this Plan is present at any site, occupiers remain responsible for their management in accordance with the respective programmes outlined earlier in Chapter 6 unless the site-led programme determines otherwise.

### 6.5.3 Description and adverse effects of pests to be managed under site-led programmes

The characteristics of each of the pests to be managed under these programmes, and adverse effects that they pose, are set out in Table 25 below.

Table 25: Characteristics and threats of pests in site-led programmes

Description and adverse effects	
Plants	
<p><b>Banana passionfruit</b> species are virtually all identical in their characteristics and appearance. They are tall, climbing vines that grow in forest and shrubland margins, stream sides, coastline cliffs, consolidated sand dunes and in domestic gardens. The plants produce large pink tubular flowers throughout the year. These develop into oval fruit that turn yellow to orange-yellow when ripe.</p> <p>This plant produces fruit that is eaten and spread by animals, birds and humans. It is capable of smothering other plants and dominating the canopy. It grows rapidly and its stems will layer. Due to this it poses adverse effects to environmental and biodiversity values of the region.</p>	
<p><b>Chilean flame creeper</b> is a climbing, hairless perennial, with a thick rootstock. It has slender stems with curling tendrils (&lt;7cm long) and watery sap. The dull, soft, light green leaves have five leaflets (10-35 x 5-16mm). Solitary, tubular scarlet flowers (15mm diameter) with five irregular petals with the bottom three having a very slender claw (7-8mm long) appear from November to April. A thin, fleshy, deep blue seed capsule (1cm wide) made up of three round parts follows flowering.</p> <p>Effectively dispersed by birds, established plants are moderately long-lived and develop a scrambling habit. It tolerates warm to cold temperatures, salt, wind, many soil types, and damp to dry conditions.</p>	

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Within disturbed forest and shrubland, its ability to climb to canopy height and depress light levels causes smothering of bush areas and the prevention of native species establishment.

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**Darwin's barberry** is an evergreen, spiny, yellow-wooded shrub (less than 4m tall) with woody and densely hairy stems that have tough, 5-pronged, needle-sharp spines. Hairless, glossy, dark green leaves (10-30mm x 5-15mm) are usually spiny-serrated along edges. Hanging clusters (7cm long) of deep orange-yellow flowers (5-7mm diameter) appear from July to February followed by oval purplish-black berries (5-7mm diameter) with a bluish-white surface.



This long-lived plant tolerates moderate to cold temperatures, damp to dry conditions, high wind, salt, shade, damage, grazing (not browsed), and a range of soils. Birds and possibly possums eat the berries and subsequently spread the seeds. Berries are also occasionally spread by soil and water movement.

It is capable of invading pasture, disturbed forest, shrubland, tussockland, along roadsides and other sparsely vegetated sites. The plant forms dense colonies that replace existing vegetation and prevent the establishment of desirable plants. Darwin's barberry will also establish under canopy in forest and shrubland. It can grow more rapidly than native species when suitable conditions arise, allowing it to dominate sites where it establishes.

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**Gunnera** is a large, clump-forming, summer-green herb (up to 2m) growing from stout horizontal rhizomes with large sized leaves (80 cm x 1 m) on sturdy stalks. Both leaves and leaf stalks are covered in rubbery red prickles. Gunnera dies down over winter in cold climates and grows new leaves in spring from large, lobed, scaly buds (25 cm long) that are pinkish-green when fresh and dry to brown. It produces small densely packed green flowers in summer on long, erect, conical spikes which develop into reddish, oblong fruit (1.5-2mm long), each containing a single oblong seed.



Source: Weedbusters

It is known in other regions in New Zealand to shade out other plants, form dense stands/clumps and to spread to bluffs, wet cliffs and near waterways. It is present on the Otago Peninsula.

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**Sycamores** are a deciduous tree (<20m tall) with smooth grey bark and hairless green shoots. Large buds (<5cm long) have pinkish inner scales. Bluish-green 5-lobed leaves (8-14 x 10-20cm) are in opposite pairs on reddish stems. Flowerheads (October-November) are narrow drooping clusters (5-15cm long) of many dense, green flowers (2-4mm long), followed by reddish, winged, 'helicopter' seed capsules (2-4cm long) containing two seeds (5-10mm long).



Source: Environment Southland

The plant is persistent and forms dense (often pure) stands. Produces many long-lived seeds that are well dispersed by wind and water. Seedlings are shade

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tolerant. It tolerates warm to very cold, moist to dry, most soils, wind and salt. Possibly able to release toxins into the soil to stop other plants growing near it. It invades disturbed and intact forest and shrubland, short tussockland, fern-land, river systems and bare land. The dense stands prevent recruitment of other species.

**Tradescantia** (wandering willie) is a trailing, soft, hairless, perennial groundcover with succulent, soft, creeping stems that root at all nodes touching the ground. Dark green, shiny, smooth and slightly fleshy leaves (3-6cm long) are oval with pointed tips. White flowers (2cm diameter) produced from December to January are 3-petalled and in small clusters. No fruit or seed is produced in New Zealand. It rapidly establishes from fragments.

The plant is very tolerant of dense shade, severe damage and grazing, wet, most soil types and high to low temperature, but intolerant of frost and drought. Stem fragments are spread by water movement, livestock, dumped vegetation, soil movement, boots and mowers.

The plant invades most damp shaded habitats, especially disturbed and previously grazed forest, shrubland, stream sides, river systems, alluvial terraces, fern-land, wetlands, and anywhere downstream or adjacent to existing infestations. It smothers ground in light to deep shade, preventing the seedlings of native species from establishing. Causes habitats to open and be invaded by exotic shrubs and vines. Mats growing on riverbanks can break away with water flow and contribute to flooding.



**Lagarosiphon** is a submerged, bottom-rooted perennial, which can form monospecific growths up to 5m tall upon reaching the water surface. The leaves are dark green (16 x 2mm) and have minute serrations along the edges. They are arranged spirally around the stem and are curved backwards or downwards. Tiny pinkish flowers are produced, but, as only female plants are found in New Zealand, no seed is set. It propagates through stem fragments being carried on water currents, boats, fishing gear, aquarium and pond escapes and deliberate planting.

This plant is present in Lakes Dunstan and Roxburgh and parts of Lake Wanaka. It is also present in the Clutha River/Mata-Au and the Kawarau River. Isolated, individual plants are regularly removed from Frankton Arm in Lake Wakatipu, which is thought to be a result of weed transfer by boats from other waterways in the region.

This plant is a potential threat to the aquatic environment because its vigorous growth displaces and shades out aquatic native plants. Dense areas of lagarosiphon may impede water flows and cause local deoxygenation of water. Aesthetic values, recreational



Source: NIWA

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activities (such as boating, water-skiing and swimming), and water supply intakes may all be adversely affected where lagarosiphon chokes and blocks water bodies. If lagarosiphon is left uncontrolled, large beds can form, come adrift and leave unsightly heaps on the shore.



## Animals

**Bennett's wallaby** – see pest description in section 6.2.2 of the Plan, Eradication Programmes.



**Feral cats** are cats that are wild or otherwise unmanaged. Feral cats are not reliant directly on human activities for survival. Feral cats resemble domestic cats in both size and colouration. Adult male cats are generally larger than the females and can weigh up to 5kg. They tend to be solitary and territorial compared to domestic stray or unwanted cats that tend to form colonies. Feral cats are mainly active at night.

Feral cats inhabit a wide range of urban, rural and forest habitats. Diet is wide-ranging and includes small mammals, fish, birds and invertebrates. They have 2-3 litters per year with an average of 4 young in each.

Feral cats have been branded as 'the ultimate predators' in New Zealand and have been nominated as among 100 of the "World's Worst" invaders. New Zealand's unique native wildlife is particularly vulnerable to predation by cats. Feral cats kill young and adult birds and occasionally take eggs, prey on native lizards, fish, frogs and large invertebrates.

Feral cats are implicated in a small way in the spread of Bovine Tuberculosis, with the potential to infect cattle. They also carry parasites and toxoplasmosis that causes abortions in sheep and illness in humans.

Feral and stray cats can be aggressive towards pet cats. Through fighting they cause severe injuries, sometimes resulting in the pet cat having to be put down. Stray cats are likely to interbreed with the un-neutered domestic cat population and may spread infectious diseases.



Source: Environment Southland



Source: DOC

**Feral deer** are medium to large-sized ungulates ranging in weight from 40kg (female white tailed) to 450kg (wapiti male). Red deer have a reddish-brown coat, while wapiti are chestnut brown with a distinctive cream rump. Sika deer have a black dorsal stripe, white rump, chestnut brown sides with white spots. The coats of white tailed deer are light brown with white undersides and rump. Fallow deer have coats of varying brown colours.

Feral deer are a valued recreation resource for hunters.



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Feral deer live in a wide range of habitats, particularly forest. They consume large quantities of native seedlings and saplings which reduces vegetation biomass and leads to failure in recruitment of a range of woody and herbaceous species and alters habitat for native fauna.

Source: DOC

Heavy and selective browsing on trees and shrubs can change forest structure and the composition of the understorey. Palatable plant species such as schefflera/pate, broadleaf, three-finger, lancewood, and hen and chicken fern can be all but removed from the ground tier. Sika deer often target species considered unpalatable to other deer.

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**Feral goats** are sheep-sized animals with short hair, pointed horns and a beard. Colour can be white, black, brown or a combination of these. Males average 39kg, are about 680mm tall and about 1.3m long. Females average 30kg, are about 620mm tall with a body length of 1.2m. Their hooves are leaved with pointed, slightly incurved tips and their eyes are greenish blue.



Source: DOC

They are social animals, disperse slowly, and do not voluntarily cross large rivers. This results in patchy distribution. However, their high birth rates, when in good condition, enable population size to roughly double every two years. The major cause of mortality is hunting, although feral pigs may prey on young goats.

Goats are browsing generalists and feed on woody species in forests. Feral goats impact on indigenous ecosystems through their concentrated browsing and trampling. Even in low numbers, their impacts on forest and scrublands can be serious – they destabilise forest ecosystems, and defoliate and eat the stems of palatable under-storey species, bark saplings, and prevent regeneration of seedlings. Unpalatable shrubs increase, and on some islands, forest ecosystems have been converted to grassland.

Feral goats have few economic impacts, although they may occasionally compete with sheep for feed, and they have a wide range of parasites and diseases in common with sheep. Their range is limited however, and they are controlled relatively easily, so it is not considered that they have any significant economic impact.

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**Feral pigs** can measure 90-200cm in length and weigh 50-90kg. Their colour varies from dark grey to brown or black. Adult males develop tusks that protrude from their mouth. Sexually mature at two years of age, they breed once per year with litter size ranging from 4-6 piglets. Vegetation forms 70% of a pig's diet. Pig rooting can reduce the diversity of seedlings and saplings and cause a dramatic reduction in leaf cover on the forest floor.



Source: Environment Southland

Feral pigs can have major effects on native flora and fauna. They eat the tops of native plants and dig up their roots, resulting in the decline of some species.

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Also eaten are many native invertebrates, native land snails and large quantities of native earthworms. Pig predation of flightless and ground-dwelling birds (e.g. kiwi) has been suggested but rarely confirmed.

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**Hedgehogs** are nocturnal insectivores. Their back and sides are completely covered with spines and they roll into a prickly ball when disturbed, or when hibernating. They are widespread through lowland areas, occupying a wide range of habitats.

These animals eat mainly insects however they eat a wide range of food if the opportunity presents itself. They are a potentially serious predator of native invertebrates, lizards, and ground nesting birds.



Source: DOC

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**Mustelids** (ferrets, stoats, weasels) are small to medium sized carnivores with large home ranges. Ferrets are the largest of the three. Male ferrets grow up to 44cm and females up to 37cm in length. The undercoat is creamy yellow with long black guard hairs that give the ferret a dark appearance. A characteristic black face mask occurs across the eyes and above the nose. Stoats have long, thin bodies with smooth pointed heads. Ears are short and rounded. Males grow up to 30cm and females up to 25cm in length. Their fur is reddish-brown above with a white to yellowish underbelly. Stoats have relatively long tails with a distinctive bushy black tip. Weasels are the smallest and least common mustelid. Males grow to about 20cm. Their fur is brown with white undercoat, often broken by brown spots. Their tails are short, brown and tapering.

Although habitat loss and modification remain the most serious threat to native biodiversity, introduced predators, such as ferrets, stoats, and weasels also pose a significant threat. Mustelids are implicated in the extinction of some indigenous bird species and as the major cause of decline of many others. Ferrets are also a threat to agriculture, particularly through their role as a vector (carrier) of Bovine Tuberculosis. Mustelids are a threat to poultry farms and carry parasites and toxoplasmosis, which can cause illness in humans and livestock.



Source: DOC

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**Possums** are marsupials and the males and females are similar in size; between 650 and 930mm, including a tail of 250 to 405mm. They weigh between 1.4 and 6.4kgs, have a furry body, a long prehensile, bushy tail, a pointed snout, pink nose, long dark whiskers and brown eyes. Possums begin breeding at one to two years of age and juveniles disperse an average of 6km from their home range. Primarily herbivores, they feed on a variety of leaves, flower buds, fruit, ferns, and fungi. They feed also on invertebrates and opportunistically on the eggs and nestlings of birds.

Therefore, they cause extensive defoliation of favoured plant species and progressive change in forest composition to less favoured species occurs. Damage is not however uniform across habitats. Possums can also impact native animals by predation of insect species, snails, and birds.

Possums cause economic effects by damaging exotic forests, eating pasture, and through the spread of Bovine Tuberculosis. However, the possum browsing on pasture is likely to be a minor problem apart from pasture/bush margins. Possums can also damage winter feed and other crops especially on bush/pasture margins. The damage to exotic forests tends to be limited but they are known to damage tree crops and domestic gardens.

Possums are included in the Plan to address adverse effects to conservation values and to protect the past economic investment Bovine Tuberculosis control. There is evidence to support the link between possums and Tuberculosis in farmed animals. Recent studies show that cattle and deer may lick and nuzzle Tuberculosis-infected possums in the terminal stages of the disease as the possums wander around open ground in daylight.



Source: DOC

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### **Rat (Norway, ship and Kiore)**

Ship rat is a slender rat with large hairless ears, grey-brown on the back with a similarly coloured or creamish-white belly, or black all over. Adults usually weigh 120-160g but can exceed 200g.

Norway rat has brown fur on its back and pale grey fur on its belly. Adults normally weigh 150-300g, may reach up to 500g, and are up to 390mm long. Tail is shorter than head-body length. Breeding commences as early as 3-4 months of age. Females can produce 15-20 young per year.

Kiore has brown fur, white-tipped grey fur on belly, pale feet with dark mark on outer edge of the hind feet. They are smaller than other rats in New Zealand, with a maximum body length of 180mm without tail, and they usually weigh 60g - 80g, maximum 180g.

They occupy a wide range of urban, rural and forest habitats. Ship rats are more common within forest areas.





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Omnivorous and opportunistic feeders eating 10% of their body weight per day. This makes them a competitor for food with many species and predators of others. They eat a variety of native flora and fauna, in particular native birds (eggs and fledglings), lizards, and invertebrates. They eat large quantities of native seeds, which reduces regeneration of native plants.



Source: *Environment Southland*

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## 6.5.4 Site-led programmes on the Otago Peninsula

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under the site-led programme for the Otago Peninsula are set out in Table 26 below.

Table 26: Aims and means of achievement for site-led programmes on the Otago Peninsula

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.4.a</b></p> <p>Over the duration of the Plan:</p> <ul style="list-style-type: none"> <li>a) preclude establishment of feral deer, feral goats, feral pigs and Bennett's wallaby; and</li> <li>b) eradicate possums; and</li> <li>c) implement sustained control of feral cats, rats; hedgehogs and;</li> <li>d) progressively contain mustelids</li> </ul> <p>on the Otago Peninsula (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objectives 6.5.4.a and 6.5.4.b.</p> <p>It is not proposed to introduce occupier control rules at this stage. However, this may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the Objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the Biosecurity Strategy.</p>
<p><b>Plan Objective 6.5.4.b</b></p> <p>Over the duration of the Plan, progressively contain:</p> <ul style="list-style-type: none"> <li>a) banana passionfruit;</li> <li>b) Chilean flame creeper;</li> <li>c) Darwin's barberry;</li> <li>d) Sycamore</li> <li>e) Gunnera; and</li> <li>f) tradescantia</li> </ul> <p>on the Otago Peninsula (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	
<p><b>Plan Rule 6.5.4.1</b></p> <p>No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Otago Peninsula (identified on Map 3 in Appendix 3) any:</p> <ul style="list-style-type: none"> <li>a) Bennett's wallaby;</li> <li>b) feral deer;</li> <li>c) feral goat;</li> <li>d) feral pig;</li> <li>e) mustelid;</li> <li>f) feral cat;</li> <li>g) hedgehog; or</li> <li>h) possum.</li> </ul>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to help achieve the exclusion, eradication or control of these pests from the Otago Peninsula.</p>

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For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under the site-led programme at West Harbour – Mt. Cargill are set out in Table 27 below.

Table 27: Aims and means of achievement for site-led programmes at West Harbour – Mt. Cargill

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.5.a</b></p> <p>Over the duration of the Plan:</p> <ul style="list-style-type: none"> <li>a) preclude establishment of feral deer and Bennett’s wallaby; and</li> <li>b) implement sustained control of feral cats, feral goats, feral pigs, rats, hedgehogs; and</li> <li>c) progressively contain mustelids; and</li> <li>d) progressively contain possums to achieve a 2% RTC</li> </ul> <p>at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p> <p><b>Plan Objective 6.5.5.b</b></p> <p>Over the duration of the Plan, progressively contain:</p> <ul style="list-style-type: none"> <li>a) banana passionfruit;</li> <li>b) Chilean flame creeper;</li> <li>c) sycamore;</li> <li>d) gunnera;</li> <li>e) Darwin’s barberry; and</li> <li>f) tradescantia</li> </ul> <p>at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objectives 6.5.5.a and 6.5.5.b.</p> <p>It is not proposed to introduce occupier control rules at this stage. However, it may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the Objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the Biosecurity Strategy.</p>
<p><b>Plan Rule 6.5.5.1</b></p> <p>No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) any</p> <ul style="list-style-type: none"> <li>a) Bennett’s wallaby;</li> <li>b) feral deer;</li> <li>c) feral goat;</li> <li>d) feral pig;</li> <li>e) mustelid;</li> <li>f) feral cat;</li> <li>g) hedgehog; or</li> </ul>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to help achieve the exclusion, eradication or control of these pests from West Harbour – Mt. Cargill.</p>

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h) possum.

For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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

The management aims and the range of methods to be used to accomplish the aims for the pest to be managed under site-led programmes at Quarantine and Goat Islands are set out in Table 28 below.

Table 28: Aims and means of achievement for site-led programmes on Quarantine and Goat Islands

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.6a</b></p> <p>Over the duration of the Plan:</p> <ul style="list-style-type: none"> <li>a) preclude establishment of Bennett's wallaby, feral cats, feral deer, feral goats, feral pigs, mustelids, hedgehogs<sup>5</sup> and possums; and</li> <li>b) eradicate rats</li> </ul> <p>on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p> <p><b>Plan Objective 6.5.6b</b></p> <p>Over the duration of the Plan, progressively contain:</p> <ul style="list-style-type: none"> <li>a) banana passionfruit;</li> <li>b) Chilean flame creeper;</li> <li>c) Darwin's barberry;</li> <li>d) Sycamore</li> <li>e) Gunnera; and</li> <li>f) tradescantia</li> </ul> <p>on Quarantine and Goat Islands (identified on Map 3, Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site.</p>	<p><b>Principal measures to be used</b></p> <p>Otago Regional Council will take a lead role in supporting community groups and agencies in bringing about the desired levels of environmental protection to this site.</p> <p>Appropriate measures drawn from the suite of activities listed under <b>collaboration, requirement to act, council inspection, service delivery, advocacy and education</b> described in section 5.3 of the Plan will be used by Otago Regional Council to achieve Objectives 6.5.6a and 6.5.6b.</p> <p>It is not proposed to introduce occupier control rules at this stage. However, it may become necessary in the future to maintain public investment of actions or funding or where lack of cooperation could jeopardise achieving the objectives.</p> <p>How the Otago Regional Council intends to deliver these objectives with the community is described more fully in the Biosecurity Strategy.</p> <p>There are no alternative measures that provide for satisfactory inspection, education or advocacy measures.</p>
<p><b>Plan Rule 6.5.6.1</b></p> <p>No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) any:</p> <ul style="list-style-type: none"> <li>a) Bennett's wallaby;</li> <li>b) feral cat;</li> <li>c) feral deer;</li> <li>d) feral goat;</li> <li>e) feral pig;</li> <li>f) mustelid;</li> <li>g) hedgehog;</li> </ul>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to help achieve the exclusion or eradication of these pests from Quarantine and Goat Islands.</p>

<sup>5</sup> Existing information suggests that hedgehogs are not present on Goat Island, however if further research demonstrates that they are, then the objective for hedgehogs on Goat Island will be eradication.

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h) possum; or

i) rat.

For the purpose of this rule place includes any building, conveyance, craft, land, or structure.

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

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**Advice Note**

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.

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### 6.5.7 Site-led programme for lagarosiphon management areas

The management aims and the range of methods to be used to accomplish the aims for lagarosiphon to be managed under site-led programmes within the lagarosiphon management areas are set out in Table 29 below.

Table 29: Aims and means of achievement for site-led programmes for lagarosiphon management areas

Objective, Principal Measures and Rules	
<p><b>Plan Objective 6.5.7</b></p> <p>Over the duration of the Plan actively manage lagarosiphon to:</p> <ol style="list-style-type: none"> <li>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;</li> <li>implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3);</li> <li>prevent the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3);</li> <li>prevent the establishment of lagarosiphon in lakes, rivers and tributaries where it is not already present</li> </ol> <p>to avoid, mitigate or prevent effects on the environment, and amenity and recreational values.</p>	<p><b>Principal measures to be used</b></p> <p>Land Information New Zealand will take a lead role in controlling and eradicating lagarosiphon in Otago's lakes and rivers that it administers. Otago Regional Council will work collaboratively with Land Information New Zealand and other partners in the preparation, administration and delivery of 10-year Management Plans for the control of lagarosiphon and in other initiatives to deliver the outcomes in the objectives.</p> <p>Occupiers will be responsible for eradicating lagarosiphon within private ponds and aquariums.</p> <p>The <b>requirement to act, service delivery, advocacy, education, and collaboration</b> described in section 5.3 of the Plan, will be used primarily to achieve Plan Objective 6.5.7.</p> <p>How the Otago Regional Council intends to support the delivery of these objectives with Land Information New Zealand is described more fully in Section 3 of the Biosecurity Strategy.</p>
<p><b>Plan Rule 6.5.7.1</b></p> <p>Any person leaving the waters of Lakes Dunstan, Wanaka or Roxburgh or from the Clutha River/Mata-Au and the Kawarau River must immediately remove and safely dispose of all fragments of lagarosiphon from boats, equipment and all other items in their possession.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to protect waterbodies not currently infested with lagarosiphon from becoming infested and threatening environmental and recreational values.</p>
<p><b>Plan Rule 6.5.7.2</b></p> <p>Occupiers must destroy and safely dispose of all lagarosiphon in any pond or aquarium on their land.</p> <p>A breach of this rule creates an offence under section 154N(19) of the Act.</p>	<p><b>Explanation of rule</b></p> <p>The reason for this rule is to protect waterbodies not currently infested with lagarosiphon from becoming infested and threatening environmental and recreational values.</p>
<p><b>Advice Note</b></p> <p>Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993.</p>	



### **6.5.8 Adding new site-led programmes to the Plan**

The process that will be followed for adding a new site-led programme to the Plan is dependent on whether the programme will have effect on a person's rights or obligations.

If such effects are not significant, the Plan may be amended by Council resolution to include the site in accordance with section 100G of the Act. For example, where minimal regulation is required and there is substantial support among the parties for its inclusion. Guidelines setting out how site-led programmes may be included in the Plan by Council resolution are provided in Appendix 2 of the Biosecurity Strategy.

In cases where such effects are considered to be significant, the addition will be by a more comprehensive process including appropriate consultation, notification and appeal provisions as required under the Act.

## 7. MONITORING

### 7.1 MEASURING WHAT THE OBJECTIVES ARE ACHIEVING

Anticipated result	Indicator	Method of monitoring	Frequency of monitoring	Reporting to Council
<b>Exclusion Programmes</b>				
Absence of African feather grass, Chilean needle grass, false tamarisk, egeria, hornwort and moth plant from the region	Absence in the Otago region	Reporting by occupiers or other persons	As reported	Annual
		Surveillance programmes	Annual surveillance programme	Annual
<b>Eradication Programmes</b>				
All spiny broom removed	Absence of spiny broom in the Otago region	Population assessment based on inspections	Annual inspection programme	Annual
		Reporting by occupiers or other persons	As reported	Annual
All rooks destroyed	Absence of rooks in the Otago region	Population assessment based on rookery inspections	Annual inspection programme	Annual
		Reporting by occupiers or other persons	As reported	Annual
All Bennett's wallaby destroyed	Absence of Bennett's wallaby in the Otago region	Population assessment based on inspections	Annual / as appropriate inspection programme	Annual and as appropriate
		Reporting by occupiers or other persons	As reported	Annual and as appropriate
<b>Progressive Containment Programmes</b>				
The spatial reduction of African love grass, bomarea, boneseed, bur daisy, cape ivy, nassella tussock, old man's beard, perennial nettle,	Annual decrease in plant population on high risk land	Population assessment as a result of inspection activities	Annual inspection programme	Annual

spartina and white-edged nightshade over the life of the Plan.				
The spatial reduction of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and/or larch over the life of the Plan.	Control and maintenance is undertaken as part of the National Wilding Conifer Control Programme	Population assessment as a result of inspections in accordance with the National Wilding Conifer Control Programme	Annual inspection programme	Annual
<b>Sustained Control Programmes</b>				
Gorse and broom does not spread between properties and to gorse and broom free areas	Absence adjacent to boundary fences	Boundary monitoring for presence / absence in response to complaint	Pre and post control operations	Annual
	Gorse and broom is excluded from gorse and broom free areas	Aerial monitoring	Every 2 years (may be more frequent for new gorse and broom free areas)	Every 2 years (may be more frequent for new gorse and broom free areas)
Nodding thistle and ragwort does not spread between properties where this affects production values on adjacent properties	No spread to adjoining properties	Boundary monitoring for presence / absence in response to complaint	Pre and post control operations	Annual
Russell lupin and wild Russell lupin do not spread between properties or along waterways	Absence within specified distances to waterways and adjacent to boundary fences	Boundary monitoring for presence / absence in high risk areas	Pre and post control operations	Annual
<b>Site Led Programmes</b>				
Support the management and control of lagarosiphon in lagarosiphon management areas	Lagarosiphon extent within lagarosiphon management areas does not spread and absence of lagarosiphon in Lake Wakatipu	presence / absence	As reported by lagarosiphon management groups, and Otago Regional Council where required – annual minimum	Annual

Support the management and control of pests occupying the Otago Peninsula, West Harbour – Mt. Cargill and Quarantine and Goat Islands site-led areas	The reduction of pests within the Otago Peninsula, West Harbour – Mt. Cargill and Quarantine and Goat Islands site-led areas	Predator Free Dunedin and Otago Regional Council monitoring of boundaries and densities	As reported by Predator Free Dunedin and Otago Regional Council where required – annual minimum	Annual
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## 7.2 MONITORING THE MANAGEMENT AGENCY'S PERFORMANCE

Otago Regional Council is the management agency. As the management agency responsible for implementing the Plan, the ORC will:

- a. prepare an operational plan within three months of the commencement date of the Plan;
- b. review the operational plan, and amend it if needed;
- c. report on the operational plan each year, within five months after the end of each financial year;
- d. maintain up-to-date databases of complaints, pest levels and densities, and responses from regional council and land owners and/or occupiers.

## 7.3 MONITORING PLAN EFFECTIVENESS

Monitoring the effects of the Plan will ensure that it continues to achieve its purpose. It will also check that relevant circumstances have not changed to such an extent that the Plan requires review. A review may be needed if:

- a. the Act is changed, and a review is needed to ensure that the Plan is not inconsistent with the Act;
- b. other harmful organisms create, or have the potential to create, problems that can be resolved by including those organisms in the Plan;
- c. monitoring shows the problems from pests or other organisms to be controlled (as covered by the Plan) have changed significantly; or
- d. circumstances change so significantly that ORC believes a review is appropriate.

If the Plan does not need to be reviewed under such circumstances, it will be reviewed in line with section 100D of the Act. Such a review may extend, amend or revoke the Plan, or leave it unchanged.

The procedures to review the Plan will include officers of the ORC:

- a. assessing the efficiency and effectiveness of the principal measures (specified for each pest and other organism (or pest group or organisms)) to be controlled to achieve the objectives of the Plan;

- b. assessing the impact the pest or organism (covered by the Plan) has on the region and any other harmful organisms that should be considered for inclusion in the Plan; and
- c. liaising with statutory authorities and key interest groups on the effectiveness of the Plan.

# PART THREE: PROCEDURES



## PART THREE: PROCEDURES

### 8. POWERS CONFERRED

#### 8.1 POWERS UNDER PART 6 OF THE ACT

The Principal Officer (Chief Executive) of Otago Regional Council may appoint authorised persons to exercise the functions, powers and duties under the Act in relation to the Plan.

ORC will use those statutory powers of Part 6 of the Act as shown in Table 30, where necessary, to help implement the Plan.

Table 30: Powers to be used from Part 6 of the Act

Administrative provisions	Biosecurity Act Reference
The appointment of authorised and accredited persons	Section 103(3) & (7)
Authorised person to comply with instructions	Section 104(2)
Delegation to authorised persons	Section 105
Power to require assistance	Section 106
Power of inspections and duties	Section 109, 110 112
Entry in respect of offences	Section 111
Duties on exercising powers under section 110 and section 111	Section 112
Power to record information	Section 113
General powers	Section 114 & 114A
Use of dogs and devices	Section 115
Seizure of evidence (under section 111)	Section 118
Power to seize abandoned goods	Section 119
Power to intercept risk goods	Section 120
Power to examine organisms and apply substances	Section 121 & 121A
Power to give directions	Section 122
Power to vaccinate	Section 123
Power to act on default	Section 128
Liens	Section 129
Declaration of restricted areas	Section 130
Declaration of controlled areas	Section 131
Duration of place and area declarations	Section 133

Enforcement of area controls	Section 134
Options for cost recovery	Section 135
Failure to pay	Section 136

**Note:** ORC's procedures sets out the procedures it will follow when land owners and/or occupiers or other persons do not comply with the rules or other duties.

## 8.2 POWERS UNDER OTHER SECTIONS OF THE ACT

Any person in breach of a rule in the Plan that specifies that a contravention of the rule creates an offence under section 154N(19) of the Act, can be prosecuted and is liable on conviction under section 157(5) of the Act to a fine.

The Principal Officer (Chief Executive) of ORC or Chief Technical Officer (employed under the State Sector Act 1988) may appoint authorised people to implement other biosecurity law considered necessary. One example is where restrictions on selling, propagating and distributing pests (under sections 52 and 53 of the Act) must be enforced. Another example is where owners and/or occupiers of land are asked for information (under section 43 of the Act).

## 8.3 POWER TO ISSUE EXEMPTIONS TO PLAN RULES

Any person may upon representation to Otago Regional Council be exempt from a requirement in a rule set out in Part Two of the Plan.

The requirements in section 78 of the Act must be met for a person to be granted an exemption. These include:

2. *The council may grant an exemption under subsection (1) only if—*
  - a. *the council is satisfied that granting the exemption will not significantly prejudice the attainment of the plan's objectives; and*
  - b. *the council is satisfied that 1 or more of the following applies:*
    - i. *the requirement has been substantially complied with and further compliance is unnecessary;*
    - ii. *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;*
    - iii. *the requirement is clearly unreasonable or inappropriate in the particular case;*
    - iv. *events have occurred that make the requirement unnecessary or inappropriate in the particular case.*
3. *The council may exempt all persons, a specified class of persons, persons in a specified place, or persons responsible for specified goods or things from a requirement in a rule, without conditions or on conditions that the council considers appropriate.*



4. *The council may grant an exemption under subsection (3) only if the council is satisfied that events have occurred that make the requirement unnecessary or inappropriate.*
5. *Conditions on which the council grants an exemption must be consistent with the purpose of this Part and must be no more onerous than the requirement from which the exemption is granted.*
6. *The council must determine the period of an exemption that the council grants.*

ORC will keep and maintain a register of exemptions granted that records the description, reasons and period of each exemption. The public will be able to inspect this register free of charge during business hours. ORC may also grant an extension of the period of an exemption.

## 9. FUNDING

### 9.1 FUNDING SOURCES AND REASONS FOR FUNDING

The Biosecurity Act 1993 and the Local Government (Rating) Act 2002 require that funding is sought from:

- people who have an interest in the Plan;
- those who benefit from the Plan; and
- those who contribute to the pest problem.

Funding must be sought in a way that reflects economic efficiency and equity. Those seeking funds should also target those funding the Plan and the costs of collecting funding.

The funding rationale incorporates the principle that those who fund the Plan should not pay for those measures outlined in Section 5.3 for which they receive no benefit or for which another party would normally consider is its role to fund. For instance, it is inequitable to fund the environmental education component of the Plan from a rate on rural land. The rationale, therefore, adopts an activity-based approach where funding shares are identified by Plan activity. An activity-based approach allows the incremental benefit from specific activities, as opposed to pest management generally, to be assessed.

The funding formulae for this is set out in the following table.

Table 31: Funding formula under the Plan

Funding formulae		
	Rural land owners and/or occupiers %	Regional Community %
African feather grass, Chilean needle grass, false tamarisk, moth plant, egeria, hornwort, spiny broom, spartina		
Inspection and monitoring		100
Education and advocacy		100
Control		100
Bennett's wallaby		
Inspection and monitoring	40	60
Education and advocacy		100
Control	40	60
Rook		
Inspection and monitoring		100
Education and advocacy		100
Control	100	

Bur daisy, gorse, nassella tussock, nodding thistle, perennial nettle, rabbit, ragwort		
Inspection and monitoring	100	
Education and advocacy		100
Control	100	
African love grass, broom, wild Russell lupin		
Inspection and monitoring		
Production	100	
Biodiversity	50	50
Education and advocacy		100
Control		
Production	100	
Biodiversity	50	50
Bomarea, boneseed, cape ivy, old man's beard, wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch		
Inspection and monitoring		100
Education and advocacy		100
Control	100 (prevent spread)	100 (initial control)
White-edged nightshade		
Inspection and monitoring	50	50
Education and advocacy		100
Control		100
Site-led programme pests		
Inspection and monitoring		100
Education and advocacy		100
Control	By agreement	
Other activities		
Enforcement	User payers wherever possible	General rate when it is not possible

The overall level of inspection, monitoring, advice and advocacy is determined by ORC independently of the pest problem on any particular property. On the other hand, control will vary with both the pest problem and the occupier's response to it on a particular property. It is important that occupiers bear the full consequences of their actions. This is likely to promote the best or optimal response from the point of view of the community as a whole.

The funding of costs allocated to rural occupiers will be through targeted rates applied to occupiers of rateable rural land. The rating base is land value, which reflects the potential

effects of pests on land assets. Land area is an alternative rating base but it is less equitable for larger properties in the region because much of the land is not affected by spill-over of pests from neighbouring properties.

ORC will continue to negotiate with Crown agencies to secure agreements to assist with the costs of implementing the Plan.

## 9.2 ANTICIPATED COSTS OF IMPLEMENTING THE PLAN

The anticipated costs of implementing the Plan reflect a best estimate of expenditure levels. Funding levels will be further examined and set during subsequent Long Term Plan and Annual Plan processes. While community funding is mainly sourced from rates, alternative funding sources will be sought by the ORC. Such funds will off-set rates or be used as a value-added component in appropriate circumstances.

The funding of the implementation of the Plan is from a region-wide general rate or targeted rate as applicable, set and assessed under the Local Government (Rating) Act 2002, and in determining this, the ORC has had regard to those matters outlined in section 100T of the Biosecurity Act.

Where the implementation of this Plan is to be funded by a targeted rate, the matters outlined in section 100T of the Biosecurity Act will be given specific regard to as part of the Annual Plan or Long Term Plan process.

It is anticipated that the estimated annual cost to the ORC for implementing the Plan will be **\$1,897,000**.

The costs listed in Table 26 are likely to rise in line with the New Zealand Consumers Price Index each year.

The costs in Table 26 are for implementing the programmes in the Plan. Additional costs will be incurred for implementing programmes in the Biosecurity Strategy and in establishing surveillance programmes for Organisms of Interest.

New incursions or unforeseen range expansions may require further funding. Any additional budget required will be outlined at the time any new incursion occurs.

Any changes to the anticipated costs listed above will be documented through the future Annual Plan process(s) and will not be updated in the Plan.

## 9.3 FUNDING LIMITATIONS

There are no unusual administrative problems or costs expected in relation to recovering costs from any of the persons who are required to pay. It is recognised that there may be a need to recover enforcement costs for some exacerbators through the courts. In some cases, for example where not all exacerbators can be identified, full cost recovery will not be realised and a rating contribution will be required.

## Glossary

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<b>Act</b>	means the Biosecurity Act 1993, including any accompanying amendments and regulations.
<b>Adjacent</b>	means, for the purpose of this Plan, a property that is next to, or adjoining, another property.
<b>Artificial watercourse</b>	means a watercourse that is created by human action. It includes an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal channel. It does not include artificial swales, kerb and channelling or other watercourses designed to convey stormwater.
<b>Authorised Person</b>	has the same meaning as in the Biosecurity Act 1993: " <i>a person for the time being appointed an authorised person under section 103 of this Act.</i> "
<b>Bed</b>	means: <ol style="list-style-type: none"><li>in relation to any river, the space of land which the waters of the river cover at its fullest flow without overtopping its banks;</li><li>in relation to any lake, except a lake controlled by artificial means, the space of land which the waters of the lake cover at its highest level without exceeding its margin;</li><li>in relation to any lake controlled by artificial means, the space of land which the waters of the lake cover at its maximum permitted operating level; and</li><li>in relation to the sea, the submarine areas covered by the internal waters and the territorial sea.</li></ol>
<b>Benefits</b>	includes benefits of any kind, whether monetary or non-monetary.
<b>Beneficiaries</b>	means the receivers of benefits accruing from the implementation of a pest management measure or plan.
<b>Biodiversity</b>	means the variability among living organisms from all sources including, among other things, terrestrial, marine, and other aquatic ecosystems, and the ecological complexes of which they are part. This includes diversity within species, between species, and of ecosystems.

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<b>Biological Control</b>	means the introduction and establishment of natural enemies that will prey on or adversely affect a pest or other organisms to be controlled.
<b>Braided river</b>	means any river with multiple, successively divergent and rejoining channels separated by gravel islands.
<b>Capital Value</b>	has the same meaning as in the Rating Valuations Act 1998: <i>“capital value of land means, subject to sections 20 and 21, the sum that the owner's estate or interest in the land, if unencumbered by any mortgage or other charge, might be expected to realise at the time of valuation if offered for sale on such reasonable terms and conditions as a bona fide seller might be expected to require.”</i>
<b>Consultation</b>	the communication of a genuine invitation to give advice and a genuine consideration of that advice.
<b>Containment area</b>	an area of pest infestation managed differently from the rest of Otago.
<b>the Council</b>	Otago Regional Council or ‘ORC’
<b>Crown</b>	means the New Zealand Government.
<b>Costs</b>	includes costs of any kind, whether monetary or non-monetary.
<b>Destroy</b>	means pull, breakdown, demolish, make useless, kill, cause to cease to exist.
<b>Direction</b>	in relation to Part 6 powers under the Act means a notice issued in accordance with section 122 of the Biosecurity Act 1993 requesting a person or land occupier to carry out certain work or measures.
<b>Distribute</b>	means to transport or in any way spread a pest.
<b>Ecosystem</b>	means a dynamic complex of plant, animal and micro-organism communities and their non-living environment, interacting as a functioning unit.
<b>Effect</b>	has the same meaning as in the Biosecurity Act 1993, unless the context otherwise requires, and: <ul style="list-style-type: none"> <li>a. includes the following, regardless of scale, intensity, duration, or frequency: <ul style="list-style-type: none"> <li>i. a positive or adverse effect; and</li> <li>ii. a temporary or permanent effect; and</li> <li>iii. a past, present, or future effect; and</li> <li>iv. a cumulative effect that arises over time or in combination with other effects; and</li> </ul> </li> <li>b. also includes the following: <ul style="list-style-type: none"> <li>i. a potential effect of high probability; and</li> <li>ii. a potential effect of low probability that has a high potential impact</li> </ul> </li> </ul>
<b>Environment</b>	has the same meaning as in the Biosecurity Act 1993: <i>“includes—</i> <ul style="list-style-type: none"> <li>a. <i>Ecosystems and their constituent parts, including people and their communities; and</i></li> </ul>

	<p>b. All natural and physical resources; and</p> <p>c. Amenity values; and</p> <p>d. The aesthetic, cultural, economic, and social conditions that affect or are affected by any matter referred to in paragraphs (a) to (c) of this definition.”</p>
<b>Environmental values</b>	means the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga.
<b>Exacerbator</b>	means the person aggravating or contributing to a particular pest management problem by action or inaction.
<b>Feral</b>	means wild or otherwise unmanaged.
<b>Feral cat</b>	Means a cat that is wild or otherwise unmanaged. Feral cats are not reliant directly on human activities for survival
<b>Forest species</b>	means a tree species capable of reaching at least 5 metres in height at maturity where it is located.
<b>Forest plantation OR Plantation Forest</b>	means a forest deliberately established for commercial purposes, being at least 1ha of continuous forest cover of forest species that has been planted and has or will be harvested or replanted.
<b>Goods</b>	is defined under the Act as any personal property.
<b>Good Neighbour Rule</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p><i>"means a rule to which the following apply:</i></p> <p>a. <i>it applies to an occupier of land and to a pest or pest agent that is present on the land; and</i></p> <p>b. <i>it seeks to manage the spread of a pest that would cause costs to occupiers of land that is adjacent or nearby; and</i></p> <p>c. <i>it is identified in a regional pest management plan as a good neighbour rule; and</i></p> <p>d. <i>it complies with the directions in the national policy direction relating to the setting of good neighbour rules."</i></p>
<b>Habitat</b>	means the place or type of site where an organism or population normally occurs.
<b>Harmful organisms</b>	means organisms that have not been declared ‘pests’ for the purposes of this Plan because, although they may have significant adverse effects, regulatory responses are not considered appropriate or necessary.
<b>Indigenous</b>	a native of New Zealand.
<b>Kāi Tahu</b>	descendants of Tahu, the tribe, who maintain manawhenua within Otago and much of Te Waipounamu, the South Island.
<b>Kāi Tahu ki Otago</b>	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.

<b>Lag phase</b>	the period of relative inactivity between the introduction of a species, and the commencement of that species' exponential spread.
<b>Mahika Kai</b>	places where food is produced or procured.
<b>Landowner</b>	has the same meaning as occupier in the Biosecurity Act 1993: <i>"occupier,—</i> <i>a. In relation to any place physically occupied by any person, means that person; and</i> <i>b. In relation to any other place, means the owner of the place; and</i> <i>c. In relation to any place, includes any agent, employee, or other person, acting or apparently acting in the general management or control of the place."</i>
<b>Management Agency</b>	has the same meaning as in the Biosecurity Act 1993: <i>"means the body specified as the management agency in a pest management plan or a pathway management plan".</i> For the purposes of this document, Otago Regional Council is the management agency for pests and other organisms to be controlled in the Otago Region.
<b>Manawhenua</b>	Those with rangatiratanga (chieftainship or authority) for a particular area of land or district.
<b>Modified McLean Scale</b>	This scale assesses rabbit population levels.
<b>Monitoring</b>	in relation to a pest or other organisms to be controlled means to observe and measure the occurrence or non-occurrence of a pest or other organisms to be controlled.
<b>National Policy Direction</b>	in respect of this Plan, means the currently operative National Policy Direction for Pest Management.
<b>Non braided river</b>	means a continually or intermittently flowing body of fresh water that is not a braided river; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).
<b>Occupier</b>	has the same meaning as in the Biosecurity Act 1993: <i>"a. In relation to any place physically occupied by any person, means that person; and</i> <i>b. In relation to any other place, means the owner of the place; and</i> <i>c. In relation to any place, includes any agent, employee, or other person, acting or apparently acting in the general management or control of the place."</i>
<b>Operational Plan</b>	means a plan prepared by the Management Agency under Section 100B of the Act.
<b>Organism</b>	has the same meaning as in the Biosecurity Act 1993: <i>"a. Does not include a human being or a genetic structure derived from a human being;</i> <i>b. Includes a micro-organism:</i>



	<p>c. <i>Subject to paragraph (a) of this definition, includes a genetic structure that is capable of replicating itself (whether that structure comprises all or only part of an entity, and whether it comprises all or only part of the total genetic structure of an entity):</i></p> <p>d. <i>Includes an entity (other than a human being) declared by the Governor-General by Order in Council to be an organism for the purposes of this Act:</i></p> <p>e. <i>Includes a reproductive cell or developmental stage of an organism:</i></p> <p>f. <i>Includes any particle that is a prion."</i></p>
<b>Person</b>	<p>has the same meaning as in the Biosecurity Act 1993:  <i>"includes the Crown, a corporation sole, and a body of persons (whether corporate or unincorporate)."</i></p>
<b>Pest</b>	<p>has the same meaning as in the Biosecurity Act 1993:  <i>"an organism specified as a pest in a pest management plan."</i></p>
<b>Pest agent</b>	<p>has the same meaning as in the Biosecurity Act 1993:  <i>"in relation to any pest, means any organism capable of—</i>  a. <i>helping the pest replicate, spread, or survive; or</i>  b. <i>interfering with the management of the pest"</i></p>
<b>Pest agent conifer</b>	<p>means any introduced conifer species that is capable of contributing toward the establishment and spread of wilding conifers and is not located within a plantation forest. This may include but is not limited to the conifer species listed in Table 3.</p>
<b>Pest Management Plan</b>	<p>has the same meaning as in the Biosecurity Act 1993:  <i>"a plan, made under Part 5 of this Act, for the management or eradication of a particular pest or pests."</i></p>
<b>Plant</b>	<p>means any plant, tree, shrub, herb, flower, nursery stock, culture, vegetable, or other vegetation; and also includes fruit, seed, spore and portion or product of any plant; and also includes all aquatic plants.</p>
<b>Principal Officer</b>	<p>The principal administrative officer of a regional council; and</p> <p>a. In relation to a regional council, means the principal officer of that council; and</p> <p>b. In relation to a region, means the principal officer of the region's regional council; and includes an acting principal officer; and</p> <p>c. In relation to the Otago Regional Council, means the Chief Executive Officer; and includes an acting Chief Executive Officer.</p>
<b>Propagation</b>	<p>means to multiply or reproduce by sowing, grafting, breeding or any other way.</p>
<b>River</b>	<p>means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity generation, and farm drainage canal).</p>

<b>Rule</b>	means a rule included in a pest management plan in accordance with section 73(5) of the Biosecurity Act 1993.
<b>Rural Zoned Land</b>	means land zoned for rural use under any territorial district plan applicable within the Otago Region. This includes rural residential and lifestyle zones but excludes large lot residential.
<b>Sale</b>	includes bartering; offering for sale; exposing, or attempting to sell; or having in possession for sale; or sending or delivery for sale; causing or allowing to be sold, offered, or exposed for sale; and also includes any disposal whether for valuable consideration or not. "Sell" has a corresponding meaning.
<b>Unwanted organism</b>	<p>has the same meaning as in the Biosecurity Act 1993:</p> <p><i>"means any organism that a chief technical officer believes is capable or potentially capable of causing unwanted harm to any natural and physical resources or human health; and</i></p> <p><i>a. includes—</i></p> <ul style="list-style-type: none"> <li><i>i. any new organism, if the Authority has declined approval to import that organism; and</i></li> <li><i>ii. any organism specified in Schedule 2 of the Hazardous Substances and New Organisms Act 1996; but</i></li> </ul> <p><i>b. does not include any organism approved for importation under the Hazardous Substances and New Organisms Act 1996, unless—</i></p> <ul style="list-style-type: none"> <li><i>i. the organism is an organism which has escaped from a containment facility; or</i></li> <li><i>ii. a chief technical officer, after consulting the Authority and taking into account any comments made by the Authority concerning the organism, believes that the organism is capable or potentially capable of causing unwanted harm to any natural and physical resources or human health"</i> </li></ul>
<b>Water body</b>	means fresh water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area.
<b>Wilding conifer</b>	Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 3, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees. This also excludes existing planted conifers of less than 1ha, such as windbreaks and shelterbelts at March 2019.
<b>Wild Russell lupin</b>	Wild Russell lupins are Russell lupins that are established by natural means.

# Appendices

## APPENDIX 1 ORGANISMS OF INTEREST

Common name	Scientific name
<b>Plants</b>	
Blackberry	<i>Rubus fruticosus</i>
Boxthorn	<i>Lycium ferocissimum</i>
Briar	<i>Rosa rubiginosa</i>
Buddleia	<i>Buddleja davidii</i>
Burdock	<i>Arctium minus</i>
Convolvulus	<i>Convolvulus arvensis</i>
Cotoneaster	<i>Cotoneaster</i> spp.
Cotton thistle	<i>Onopordum acanthium</i>
Giant hogweed	<i>Heracleum mantegazzianum</i>
Heath rush	<i>Juncus squarrosus</i>
Hieracium (hawkweed)	<i>Hieracium</i> spp.
Horehound	<i>Marrubium vulgare</i>
Hawthorne	<i>Crataegus monogyna</i>
Japanese honeysuckle	<i>Lonicera japonica</i>
Japanese knotweed	<i>Fallopia japonica</i>
Lake snow	<i>Lindavia intermedia</i>
Periwinkle	<i>Vinca major</i>
Purple loosetrife	<i>Lythrum salicaria</i>
Reed sweetgrass	<i>Glyceria maxima</i>

Rowan	<i>Sorbus aucuparia</i>
Saltmarsh rush	<i>Juncus gerardii</i>
Spanish heath	<i>Erica lusitanica</i>
Thyme	<i>Thymus vulgaris</i>
Tree Lupin	<i>Lupinus arboreturns</i>
Veldt grass	<i>Ehrharta erecta</i>
Wild ginger	<i>Hedychium gardnerianum</i>
Willow	<i>Salix</i> spp.
Yellow bristle grass	<i>Setaria pumila</i>

### Animals

Goose	
Canada	<i>Branta canadensis</i>
White/domestic	<i>Anser</i> spp.
Wasp	<i>Vespula</i> spp.
Mouse	<i>Mus musculus</i>

### Marine

Asian paddle crab	<i>Charybdis japonica</i>
Mediterranean fanworm	<i>Sabella spallanzanii</i>
Sea couch	<i>Agropyron pungens</i>
Sea squirts	<i>Styela clava</i> , <i>Eudistoma elongatum</i> , <i>Pyura doppelganger</i> and <i>Didemnum vexillum</i>
Undaria	<i>Undaria pinnatifida</i>

### Freshwater

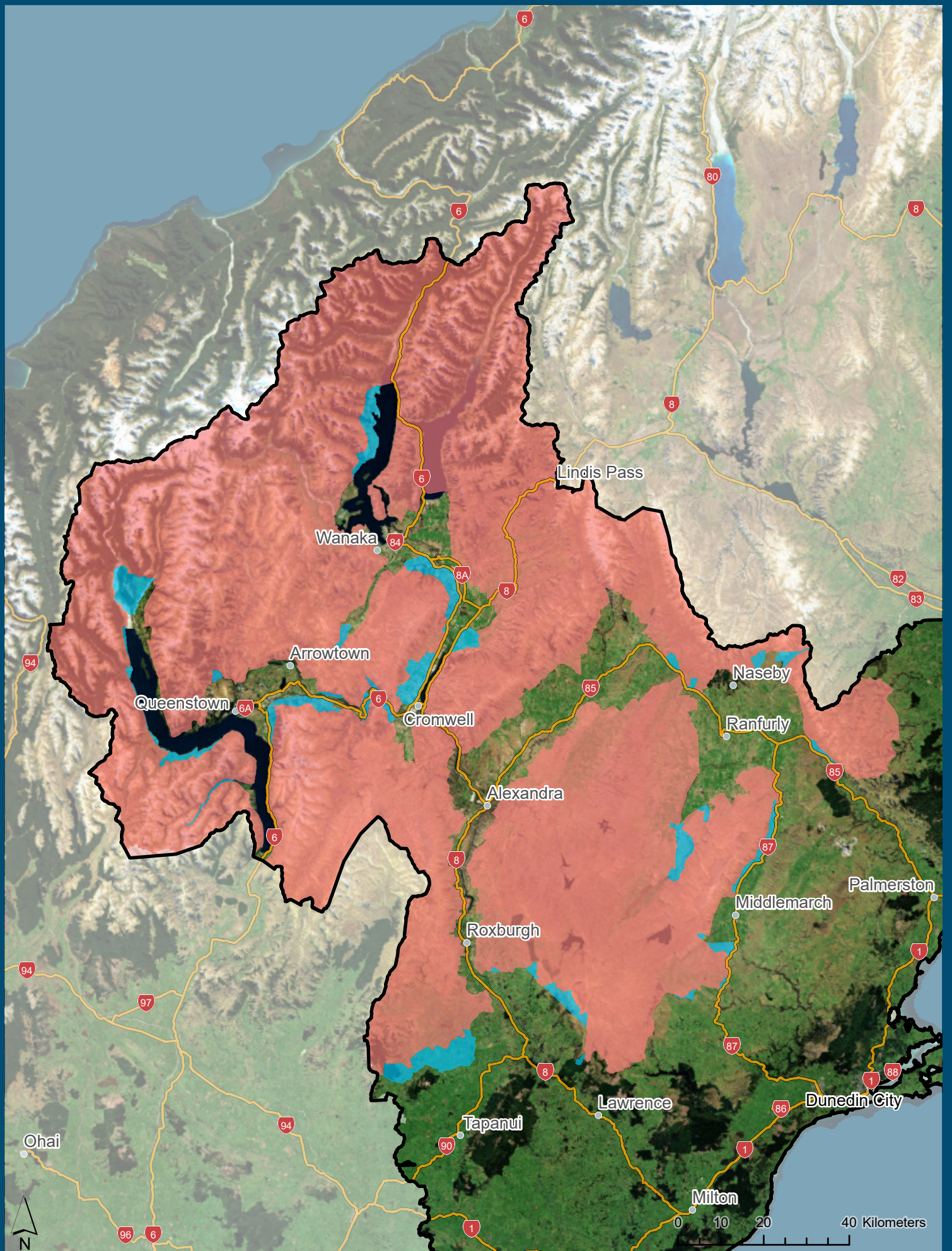
Goldfish	<i>Carassius auratus</i>
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## **APPENDIX 2 MODIFIED MCLEAN SCALE**

This scale assesses rabbit population levels.

1. No sign found. No rabbits seen.
2. Very infrequent sign present. Unlikely to see rabbits.
3. Odd rabbits seen; sign and some buck heaps showing up. Pellet heaps spaced 10 metres or more apart on average.
4. Pockets of rabbits; sign and fresh burrows very noticeable. Pellet heaps spaced between 5 metres and 10 metres apart on average.
5. Infestation spreading out from heavy pockets. Pellet heaps spaced 5 metres or less apart on average.
6. Sign very frequent with pellet heaps often less than 5 metres apart over the whole area. Rabbits may be seen over the whole area.
7. Sign very frequent with 2-3 pellet heaps often less than 5 metres apart over the whole area. Rabbits may be seen in large numbers over the whole area.
8. Sign very frequent with 3 or more pellet heaps often less than 5 metres apart over the whole area. Rabbits likely to be seen in large numbers over the whole area.

## **APPENDIX 3 MAPS**



Map 2: Gorse and Broom Free Areas

Gorse and Broom Free Areas
  New Gorse and Broom Free Areas





TO PROTECT WHAT WE TREASURE:

# BIOSECURITY STRATEGY

October 2019



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# OTAGO REGIONAL COUNCIL BIOSECURITY STRATEGY



<b>Proactive Biosecurity Management</b> Addressing issues before they become significant	<b>Responsive and Flexible</b> Utilise the most efficient and effective methods for control	<b>Integrated and Collaborative Action</b> Working with all parties at all levels	<b>Landscape Scale and Site Scale</b> Target key areas for collaborative and coordinated control
Action 3.1.1 Managing pathways	Action 3.2.1 Administer the Pest Management Plan	Action 3.3.1 National and sub-national initiatives with MPI and others	Action 3.4.1 Provide regional leadership and support for site-led programs
Action 3.1.2 Excluding harmful organisms from Otago	Action 3.2.2 Be flexible in responding to other biosecurity issues	Action 3.3.2 Cooperation and partnerships with local authorities	Action 3.4.2 Advocate and support the continued suppression of lagarosiphon
Action 3.1.3 Eradicating pests from Otago	Action 3.2.3 An 'all of council' approach to biosecurity at Otago Regional Council	Action 3.3.3 Support and work in partnership with Kai Tahu	Action 3.4.3 Other site and landscape scale initiatives
Action 3.1.4 Investing in research and development	Action 3.2.4 Regularly report on biosecurity issues and successes	Action 3.3.4 Support and empower Otago's people and communities	
<ul style="list-style-type: none"> <li>• Biosecurity technical working group</li> <li>• A marine pathway management plan</li> <li>• Landowner led possum control programme</li> <li>• Exclusion pest surveillance programme</li> </ul>	<ul style="list-style-type: none"> <li>• Update Otago Regional Council operating procedures</li> <li>• Guidance on harmful organisms</li> <li>• Transitional programmes in Pest Management Plan</li> <li>• Urban gorse and broom programme</li> <li>• Landowner led rabbit programme</li> </ul>	<ul style="list-style-type: none"> <li>• Support Enviroschools in biosecurity</li> <li>• Promote the eco fund</li> <li>• Volunteer facilitation programme</li> <li>• Shared data platform</li> <li>• National or multi-regional pest management responses</li> </ul>	<ul style="list-style-type: none"> <li>• Contributes to Predator Free Dunedin management plan and develop an Otago Regional Council plan of action</li> <li>• Support Dunedin City Council urban linkages plan</li> <li>• Support groups with site led initiatives</li> </ul>

**PART ONE:  
INTRODUCTION**



*Old Man's Beard*

# 1 INTRODUCTION

## 1.1 PURPOSE AND SCOPE

This strategy sets out the Otago Regional Council’s (ORC) biosecurity approach and prioritises a programme of action for effective biosecurity management across Otago.

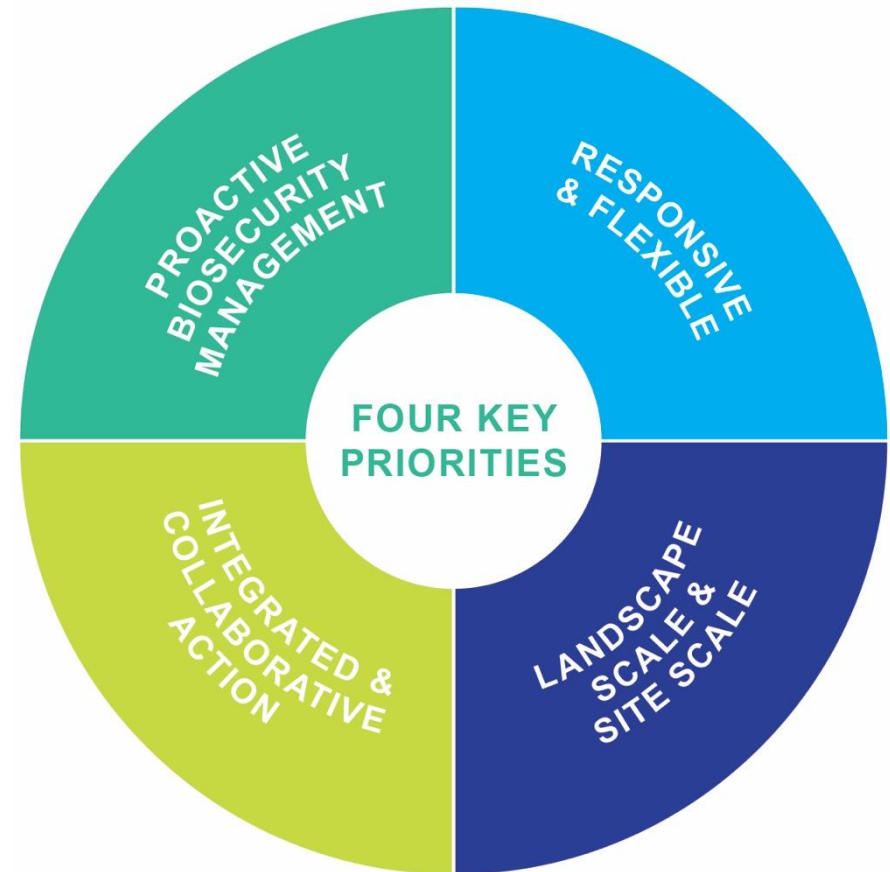
This strategy integrates ORC’s statutory and non-statutory biosecurity functions, including the proposed Regional Pest Management Plan (Pest Management Plan) and all other biosecurity activities such as monitoring and surveillance, research, incursion responses and collaborative action.

The strategy will guide the delivery of ORC’s biosecurity activities over the next 10 years. This includes different measures to protect our environment, economy and communities from the impact of harmful organisms

## 1.2 WHAT WE WANT TO ACHIEVE

### To protect what we treasure from the impacts of harmful organisms

This is an ongoing, long-term goal for biosecurity in Otago. We have set four key priorities that shape how ORC will deliver biosecurity functions over the next 10 years. Each priority has a series of actions that inform how ORC will undertake biosecurity management. An implementation programme then sets out key projects and activities for the first five years of this strategy and requires an annual operation plan be prepared to measure progress.



### 1.3 INTRODUCED SPECIES IN OUR REGION

Otago covers 12% of New Zealand's land area and at about 32,000km<sup>2</sup>, is the second largest region in New Zealand. We have a high level of endemism, a wide range of geography and ecosystems, from alpine regions, glacial lakes, grasslands, forests, and a dramatic coastline.

Agriculture is the basis of Otago's economic development and continues to be a major source of revenue, as does mining and education. Tourism is also a key contributor to the Otago economy and a significant employer in the region. Otago's landscapes and geography are a key attraction to those who visit the region.

Many of New Zealand's introduced species are now harmful organisms in Otago. Some of these were introduced for trades and industries, some by acclimatisation efforts, and others accidentally. Some have only recently arrived. Given our region's reliance on our agricultural and tourism sectors, and our abundant biodiversity, harmful organisms have a major impact on our region.

### 1.4 WHAT THE BIOSECURITY STRATEGY COVERS

#### Harmful organisms

A harmful organism is a plant, animal or other organism that is capable of causing harm to our environment, communities or economy. Not all harmful organisms can or should be managed in Otago's Pest Management Plan, and this strategy identifies how ORC will respond to all organisms that cause us harm. Harmful organisms may be 'pests', 'unwanted organisms' or 'organisms of interest'.



## Pests

The 51 pest plants and animals in Otago's Pest Management Plan are legally declared as pests under the Biosecurity Act 1993. This means ORC can set enforceable rules to manage them. The Plan is reviewed every 10 years in accordance with the Biosecurity Act.

## Organisms of interest

As described above, only some harmful organisms in Otago are designated as pests in Otago's Pest Management Plan, however many others present a biosecurity risk. We have compiled a list of organisms that are of interest to Otago and may be candidates for pest status in the future, depending on changes to their distribution or degree of impact, as well as the ability for us to successfully control these species.

## Unwanted organisms

An unwanted organism is an organism declared under the Biosecurity Act 1993 that cannot be sold, propagated, bred, multiplied, communicated, released, caused to be released or otherwise spread. A database of unwanted organisms is administered by the Ministry for Primary Industries. The National Pest Plant Accord and the National Pest Pet Biosecurity Accord are also national registers of organisms that can be managed using the same controls. Unwanted organisms may be controlled at a national, regional or local level.





**PART TWO:  
WHY A  
BIOSECURITY  
STRATEGY?**

## 2 WHY A BIOSECURITY STRATEGY?

### 2.1 BIOSECURITY ISSUES IN OTAGO

This strategy sets out ORC's biosecurity priorities for the Otago region. This includes different measures to protect our environment, economy and communities from the impacts of harmful organisms. This requires a coordinated regional effort if we are to make a difference.

#### Indigenous Biodiversity

Otago is one of the most biodiverse regions in New Zealand. From the albatross/toroa and yellow-eyed penguins/hoiho on the Otago Peninsula, to the endangered skinks/mokomoko of Central Otago and the cheeky kea of the Southern Alps. Not to mention the hundreds of indigenous lizards, birds, freshwater fish, plants, and marine species. Many species in Otago have a high level of endemism, and are found nowhere else on earth.

Our indigenous biodiversity contributes to our health, our economy, and our social and cultural wellbeing. However, what little remains is increasingly threatened by harmful organisms. Species such as rats and stoats predate on our native and often vulnerable or endangered ground-nesting and flightless birds. There are more than 400 weeds of conservation concern in New Zealand. In Otago, invasive plants like old man's beard smother and kill native vegetation if left uncontrolled and destroy vulnerable habitats. This biosecurity strategy seeks to manage the impacts of organisms that harm our environment and works in tandem with ORCs Biodiversity Strategy.

#### Mana Whenua values

Kāi Tahu are mana whenua of the Otago region. Kāi Tahu means the 'people of Tahu', linking them by name to their common ancestor Tahu Pōtiki. The Kāi Tahu tribal area extends from the sub-Antarctic islands in the south to Te Parinuiowhiti (White Cliffs, Blenheim) in the north and to Kahurangi Point on Te Tai o Poutini (the West Coast). Te Rūnanga o Ngāi Tahu (the iwi authority) comprises 18 papatipu rūnaka, of which four are in Otago. The four Otago rūnaka are Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otakou, and Hokonui Rūnanga.

Harmful terrestrial and aquatic organisms can adversely affect the values of Kāi Tahu and rūnaka. Harmful aquatic species can affect mahika kai and Wai Māori. Kāi Tahu identify the maintenance and enhancement of associations with mahika kai as primary means to realise intergenerational knowledge transfer and thus strengthen cultural identity and well being. Predator species and invasive plant species adversely affect biodiversity that is significant to Kāi Tahu and can impact wāhi tūpuna.

The Kāi Tahu Natural Resources Management Plan 2005 contains a number of issues, objectives and policies regarding the control of biosecurity threats. It also informs Kāi Tahu expectations regarding the nature of participation and consultation in natural resource management matters.



## Economy

Otago's regional GDP in 2015 was \$10.2 billion, comprising 4.2% of national GDP. Agriculture is a major source of revenue accounting for \$555 million (5.4%) of GDP (Statistics NZ). Agriculture includes animal farming and crop growing both of which are important for the Otago region. Dairy farming for example covers a total of 91,438 hectares in Otago and accounts for 5.7% of New Zealand's dairy production (New Zealand Dairy Statistics 2017-18, LIC). Tourism now provides more than a quarter of Otago's GDP, the highest proportion for any region (Partially Operative Otago Regional Policy Statement). Tourism and Agriculture are key contributors to the Otago economy and employment with the region's biodiversity, landscapes, natural resources and geography important for both of these industries.

Harmful organisms increasingly have a major impact on Otago's economy. This costs the country billions of dollars in lost revenue and control. For example, pastoral weeds are conservatively estimated to cost the New Zealand economy \$1.2 billion per annum in lost production and control costs. In Otago, production pests such as ragwort can affect stock, and pests such as nodding thistle and nassella tussock can impact production values. Other species such as possums can spread viruses and diseases such as bovine tuberculosis. Wallabies and rabbits are significant production pests, where ORC invests considerable resource to manage the impacts of spread.

### Case study: Rabbits

Rabbits were originally introduced to New Zealand by European settlers, but shortly spread out of control. They've remained one of the biggest pests in Otago ever since.

Rabbits impact pastoral production, particularly on extensive farming operations. Ten rabbits can eat as much grass as one sheep, and rabbit populations can explode quickly.

Controlling rabbits remains the responsibility of all landowners. Effective management of these pests requires all landowners, large and small, to keep rabbit numbers down on their property.

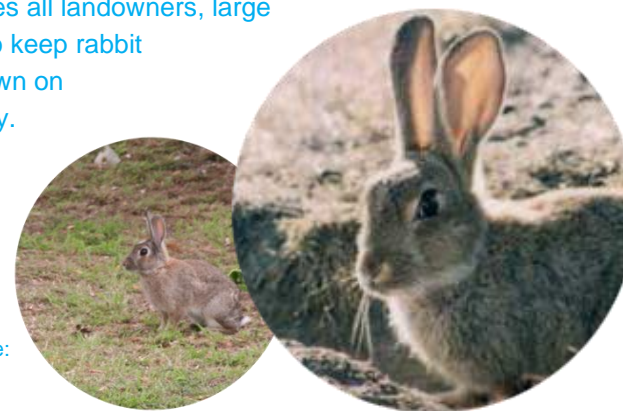


Photo reference:  
LH: 01, RH: 02.

## Landscape, amenity and recreation

Harmful organisms can reduce the community's enjoyment of natural areas by impacting access and restricting travel. They can destroy wilderness areas, affect our waterways and reduce animal, plant and fish numbers. This can impact the values of our landscapes, adversely affecting visual amenity for Otago's residents and visitors, cultural landscapes and our sense of identity.

Tree species such as wilding conifers can completely transform vast landscapes. Gorse and broom can restrict access to rivers, making it difficult for people fishing and picnicking. Aquatic weeds such as lagarosiphon, didymo and lake snow can impact where we can swim and recreate.

### Case study: Wilding conifers

A national collaborative model has been established to prevent the spread of, and to progressively remove, wilding conifers from certain areas, through the National Wilding Conifer Control Programme which commenced in 2016.

In Otago, this effort has seen nearly 300,000 hectares cleared over 2016 – 2018 on the back of a partnership effort between ORC, government agencies, local councils, landowners and community groups like the Central Otago Wilding Conifer Control Group and the Wakatipu Wilding Conifer Control Group.

Photo reference: RH: 03



## 2.2 OTAGO REGIONAL COUNCIL'S ROLE IN BIOSECURITY

ORC provides regional leadership to manage biosecurity issues in Otago, working closely with mana whenua, communities, central and local government and other key agencies and groups. The legislation and policy instruments that underpin or authorise ORC's biosecurity-related programmes and activities are summarised below.

### The Biosecurity Act 1993

The Biosecurity Act 1993 (the Act) mandates regional councils to provide: "...leadership in activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in New Zealand (pest management) in their region". This includes:

- (a) promoting the alignment of pest management in the region;
- (b) facilitating the development and alignment of regional pest management plans and regional pathway management plans in the region;
- (c) promoting public support for pest management; and
- (d) facilitating communication and co-operation among those involved in pest management to enhance effectiveness, efficiency, and equity of programs (section 12B(2) of the Act).

The Act is enabling and any regional council involvement in pest management activities is at the Council's discretion. ORC is involved in various national control programmes, including for wilding conifer control, didymo and lake snow.

However, the imposition of any rules or regulatory powers under the Act requires the preparation of a regional pest management plan, pathway management plan or small-scale management programme (pest plans).

The National Policy Direction is a regulation that sets out additional requirements for the development of pest plans. This includes requirements to ensure that they are cost effective (the benefits outweigh the costs), all pest plans align, how to set good neighbour rules and direction on how plans must be prepared.

### Proposed Otago Regional Pest Management Plan

The Pest Management Plan provides a regulatory framework for efficient and effective management or eradication of 51 animal and plant pest species to reduce the adverse effects of these pests and to maximise the effectiveness of pest management action by providing a regionally coordinated approach. These pests will be managed on a regional or site led basis.

Not all organisms that cause harm are managed by the Pest Management Plan. Some species may already be managed by a different agency or might be better suited to a different management approach, or the costs of managing the organism may outweigh the benefits of doing so.

### Pathway management plans and small-scale management programmes

Pathway management plans set rules to prevent harmful organisms from being transported into new or different areas. There are no regional pathway management plans in Otago. However, these may be developed in the future and could apply on a regional or multi-regional basis. ORC will investigate the potential for pathway plans, including for marine species.

Small-scale management programmes can be utilised for any unwanted organism. To undertake a small-scale programme, ORC must prepare a public notice, and can then immediately undertake direct control without needing to prepare or review a pest plan. Section 100V of the Act sets out these criteria. This includes being satisfied that without action the

organism could cause serious impacts, and that it can be effectively eradicated or controlled within three years.

### Other legislation, plans and strategies

The Local Government Act 2002 (LGA) sets out the statutory purpose of district and regional councils and the Long Term Plan (LTP) process provides a framework for the direction and priorities of each local authority. Through LTPs, councils secure funding for their activities in consultation with their communities. This includes funding for biosecurity activities.

Regional councils also have responsibilities under the Resource Management Act 1991 (RMA) for natural and physical resources. Adverse effects are managed through regional policy statements, regional and district plans, and resource consents. Regional policies and plans can manage activities so that they do not create or exacerbate biosecurity risks. ORC's Regional Policy Statement contains policies and methods to manage biosecurity effects.

### Otago Biodiversity Strategy

ORC has also recently adopted a regional Biodiversity Strategy which outlines actions and programmes that ORC will lead or participate in to achieve improved biodiversity outcomes. The control of harmful organisms makes a significant contribution to biodiversity outcomes. This will be recognised in the implementation of the Biosecurity Strategy and Biodiversity Strategy, by ensuring integrated outcomes are achieved across the two.

## 2.3 THE ROLE OF OTHER AGENCIES

Other agencies and groups also have statutory roles and obligations and undertake action in relation to biosecurity. As part of this strategy, the ORC is seeking not to duplicate the work of other agencies and groups, but rather identify activities and programmes to work collaboratively, provide support and add value where appropriate.



**Central government:** managing risk offshore, developing international standards and rules, trade and bilateral agreements, monitoring emerging risks, setting import health standards.



**Ministry of Primary Industries:** Intercepting biosecurity risks at the border, verifying compliance with the rules. National readiness, surveillance response and management. Department of Conservation and Land Information New Zealand also carry out national and multiregional coordinated control.



**Otago Regional Council:** Eradication, containment and control of pests and diseases within and between regions. This involves participating in national and multiregional initiatives with government ministries/departments, organisations and regional councils.



**Individuals, groups, Territorial Authorities and organisations:** Protecting the places that we value. New actions are identified in this Strategy so that ORC further supports biosecurity initiatives at a local level.

## Ministry for Primary Industries

The Ministry for Primary Industries (MPI) is the Government department charged with leadership of New Zealand's biosecurity system. MPI has the lead role in administering the Biosecurity Act and undertaking pest and disease surveillance. MPI's responsibilities include preventing the introduction and spread of new species to New Zealand. Key MPI policies/plans include The National Policy Direction for Pest Management 2015 (National Policy Direction), the Biosecurity 2025 Direction Statement and the Pest Management National Plan of Action 2010. MPI lead national and sub-national responses to biosecurity incursions.

## The Department of Conservation

The Department of Conservation (DOC) is funded and empowered to manage pests and harmful organisms on public conservation land and is the principal central government agency involved in the conservation of biodiversity. DOC's role is broad and multifaceted, operating under the Conservation Act 1987, the National Parks Act 1980, the Wildlife Act 1953, the Wild Animal Control Act 1977, and the Reserves Act 1977.

DOC's statutory responsibilities include managing public conservation land, freshwater fisheries (including pest freshwater fish under the Freshwater Fisheries Regulations 1983), and the control of wild deer, chamois, thar, goats and pigs under the Wild Animal Control Act 1977. DOC is also required to control pests on land that they occupy or administer in accordance with any good neighbour rules in the Pest Management Plan.

## The New Zealand Transport Agency

The Transport Agency is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to

provisions applicable to land occupiers for the purposes of obligations for pest control on road reserves or verges.

## Territorial Authorities

Otago is made up of five territorial authorities: Dunedin City Council, Clutha, Central Otago, Queenstown Lakes and Waitaki District Councils. Waitaki District straddles both the Otago and Canterbury regions.

Each territorial authority manages council reserves and undertakes direct management of harmful organisms impacting on reserves and other council administered land, within that territory. Territorial authorities are also road controlling authorities in their district. They are required to control pests on land that they occupy or administer in accordance with the Pest Management Plan rules.

## KiwiRail

KiwiRail is the Crown agent responsible for managing New Zealand's railway infrastructure. KiwiRail is required to control pests on land that they occupy or administer in accordance with the Pest Management Plan rules.

## Land Information New Zealand

Land Information New Zealand (LINZ) manages over 5,000 properties across New Zealand, totalling almost two million hectares and 8% of New Zealand's land area. These include high country pastoral leases, Crown forest licensed land, former railway properties and the beds of many lakes and rivers. LINZ is responsible for biosecurity on land under its management and works collaboratively with other parties in undertaking its pest control programmes. This includes controlling pests in accordance with any good neighbour rules set out in the Pest Management Plan.

## Predator Free 2050

Predator Free 2050, led nationally by the Predator Free New Zealand Trust, has a goal to rid New Zealand of the most damaging introduced predators that threaten our natural taonga, our economy and primary sector. Ridding New Zealand of possums, rats and stoats by 2050 is a nationwide goal, with new techniques and a co-ordinated effort across communities, iwi, and public and private sectors.

At a local level, predator control initiatives are underway across Otago. This varies from smaller scale projects to large landscape scale initiatives in different areas across the region.

Predator Free Dunedin is a collaboration of 20 stakeholders working together to implement predator free objectives across large landscape scale projects on Otago Peninsula, North Harbour/Mt Cargill and the Dunedin urban area. The Pest Management Plan and this strategy supports the delivery of these predator free objectives and seek to support smaller scale and other landscape scale projects too.

## Groups, industries and individuals

Everyone has responsibilities for pest management. At the individual level, people manage their land to keep it free of weeds and pests, particularly where this benefits them. Everyone is bound by the requirements in the Biosecurity Act for unwanted organisms and private land occupiers are required to control pests in accordance with the Pest Management Plan rules. There are many groups and non-governmental organisations in Otago that also play a key role in biosecurity management by undertaking voluntary management as part of biodiversity projects and site led initiatives.

At an industry level, industries such as OSPRI and Kiwifruit Vine Health, have prepared and are implementing national pest management plans under the Biosecurity Act. Other examples include the Plant Nurseries

Association involvement in the National Pest Plant Accord, and Port Otago's involvement in marine pest surveillance and management.

### Case study: OSPRI

OSPRI is a partnership between the primary industry sector and the government. OSPRI's TBfree programme aims to eradicate bovine tuberculosis affecting stock.

A core component of this is the control of possums. Possums are very susceptible to TB and the disease can spread quickly in them. This makes controlling possum numbers, particularly in areas where TB is prevalent, a key component of OSPRI's work. Infected herds have reduced nationally from over 300 in 2003 to 54 in 2017.

Photo reference:  
LH: 04, RH: 05



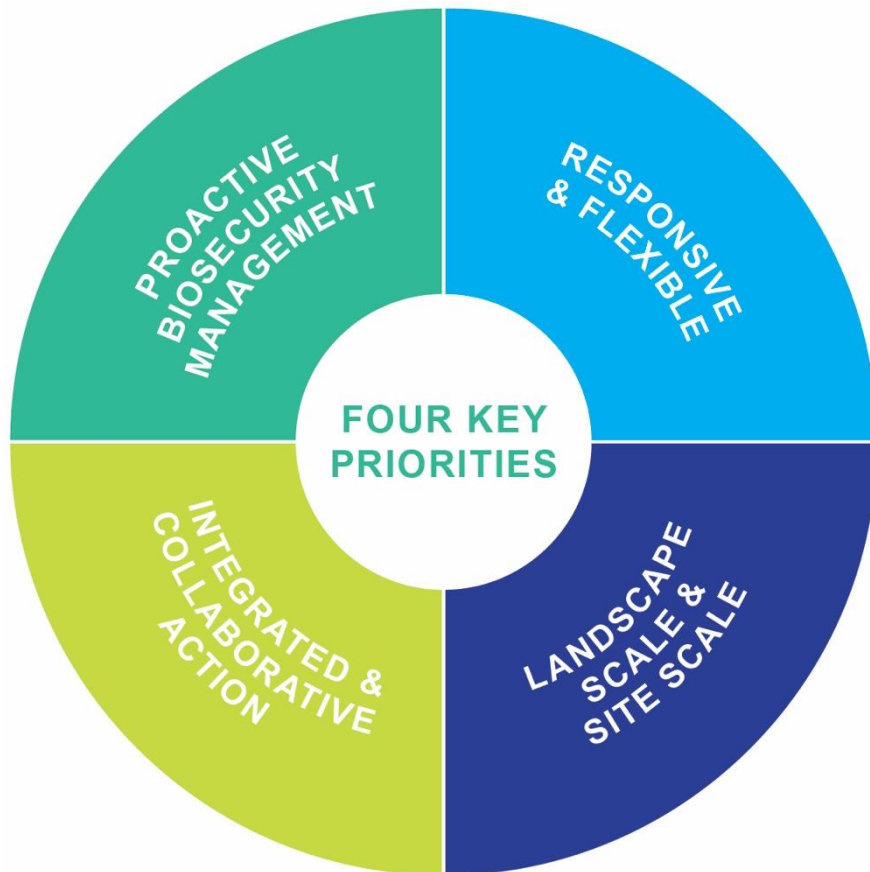


**PART THREE:  
KEY REGIONAL  
PRIORITIES AND  
ACTIONS**

*Darwin's Barberry*

### 3 KEY REGIONAL PRIORITIES AND ACTIONS

To achieve our long-term goal for biosecurity in Otago, four key regional priorities have been identified. Each of the four key priorities have a series of actions that inform how ORC will undertake biosecurity management over the next 10 years.



#### 3.1 PROACTIVE BIOSECURITY MANAGEMENT: ADDRESSING ISSUES BEFORE THEY BECOME SIGNIFICANT

ORC's first key priority is proactive biosecurity management. This means addressing biosecurity issues before they become significant. ORC has a number of management options, and the most appropriate response will depend on the nature of the organism, the potential risk, and the effectiveness of the options available to respond. These actions include:

##### Action 3.1.1 Managing pathways

- **Advocate for the preparation of national and sub-national pathway management plans** where rules are needed to prevent harmful organisms from being transported into new or different areas.
- **Actively advocate for a national marine pathway management plan** to minimise the risk of marine pests being spread throughout the coastal marine area within Otago and between regions.

##### Action 3.1.2 Excluding harmful organisms from Otago

- **Undertake research and surveillance for exclusion pests** in ORC's Pest Management Plan. Where neighbouring councils manage or exclude the same species, work collaboratively on research and surveillance where it is efficient and effective to do so.
- **Undertake risk assessments of other harmful organisms** that are not yet present in Otago but may have the potential to cause significant harm if they were established. As above, collaborate with neighbouring councils where they are also investigating the same species.
- **Utilise the rules and powers in the Pest Management Plan to eliminate incursions** where exclusion pests are discovered in Otago.



- **Utilise the Biosecurity Act to implement small-scale programmes** where an unwanted organism that was not previously present in Otago is now present, and without direct action, the organism could cause serious impacts.

#### Case study: Marine pests in Otago

Otago Harbour is highly valued by the community and a vital transport hub for the region. This means it is also subject to high traffic, which can spread marine pests.

Recent surveys of the Harbour have not identified any 'new-to-New Zealand' pests. However, already established marine pests like clubbed tunicate and Japanese seaweed remain present.

ORC is advocating for a national marine pathway management plan to provide a coordinated and effective management approach to marine pest spread.

#### Action 3.1.3 Eradicating pests from Otago

- **Within the 10 year life of the Pest Management Plan, eradicate rooks and spiny broom** from Otago. Once eradicated, update their status in the Pest Management Plan to exclusion species and continue surveillance to prevent any new incursions.
- **Within the 10 year life** of the Pest Management Plan, eradicate possums from Otago Peninsula. Once eradicated, identify new areas for possum eradication.
- **Investigate the potential to eradicate Spartina and one or more of the species** listed in the Pest Management Plan as progressive containment species, once the species above are eradicated.

#### Action 3.1.4 Investing in research and development

- **Monitor the state of the environment**, including the impacts of harmful organisms on biodiversity and water quality.
- **Contribute to and facilitate regional, national and international research** on biological controls for harmful organisms.
- **Prioritise this research to target harmful organisms** that have the greatest threat to the Otago region, and where possible, work collaboratively with other organisations so that research is cost effective to ORC and can be of value to more people.
- **Advocate and educate people and communities on the best technologies available** and new innovations to manage harmful organisms where these provide more efficient, effective, and humane control techniques.

### 3.2 RESPONSIVE AND FLEXIBLE: UTILISE THE MOST EFFICIENT AND EFFECTIVE METHODS TO CONTROL HARMFUL ORGANISMS

ORC's second key priority is to be responsive and flexible in delivering biosecurity outcomes. This means managing harmful organisms in the most efficient and effective way, and ensuring biosecurity outcomes are incorporated into all ORC's strategies, plans, and projects. It also means being adaptable to changing situations and taking a precautionary approach when little is known.

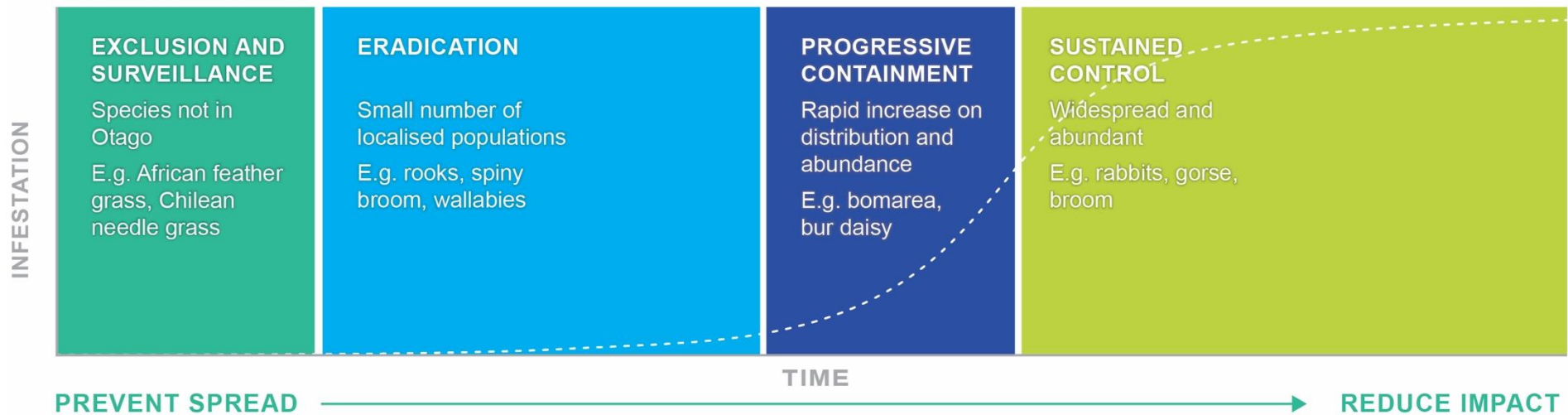
The pest infestation curve is used in New Zealand to help determine the most appropriate management option. The position of a species on the curve directly relates to the cost effectiveness of eradicating or controlling it. The lower the species is on the curve, the more cost effective it is to control. ORC uses this continuum to help decide how to best manage harmful organisms.

#### Case Study: Eradicating rooks from Otago

Rooks can damage cereals, new crops and pasture. Over the last few decades ORC has successfully reduced rook numbers from an estimated 150 birds in 2006 to less than 40 birds today. ORC aims to completely eradicate rooks from Otago within the next 10 years.



Photo reference: 06



### Action 3.2.1 Administer the programmes in the Pest Management Plan

- **Undertake monitoring and surveillance of all pests** in the Pest Management Plan and administer the rules to achieve the Plan's objectives.
- **When administering the rules of the Pest Management Plan, work proactively with landowners and occupiers** to help them understand what rules apply to their land, what their responsibilities are, and give them advice and support on control options.
- **Utilise ORC's Exemption Powers under the Biosecurity Act**, where a flexible approach is required to effectively manage pests in the Pest Management Plan, and where landowners and occupiers meet the criteria set out in section 78 of the Act.

### Action 3.2.2 Be flexible in responding to biosecurity issues outside the Pest Management Plan

- **Support owners and occupiers by providing advice and information** on how to control harmful organisms that are not listed in the Pest Management Plan.
- **Provide additional guidance on the ORC website** about how to manage harmful organisms. This will include information on surveillance and identification, and control measures.
- **Develop internal guidelines for biosecurity staff** to inform the most efficient and effective response to biosecurity issues that arise.
- **Support incursion or management responses by other agencies**, including MPI, LINZ, DOC and other agencies where appropriate.

### Action 3.2.3 Apply an 'all of council' approach to biosecurity at Otago Regional Council

- **Ensure ORC's strategies and plans provide for improved biosecurity outcomes** in objectives, policies, rules and methods.
- **Consider and bolster where possible biosecurity outcomes** when undertaking and implementing ORC works and projects in other areas.
- **Strategically align ORC projects that provide biosecurity benefits** to apply an integrated and multi-level approach, particularly where these relate to site or landscape-scale projects and biodiversity outcomes.

### Action 3.2.4 Regularly report on biosecurity issues and successes

- **ORC will prepare an operational plan** in accordance with section 100B of the Biosecurity Act that sets out how ORC will administer the Pest Management Plan and biosecurity actions over the coming 12 months, and update and report on the plan outcomes on an annual basis.
- **Investigate new ways to share information on biosecurity issues and successes with communities.** This will include investigating how spatial information can be shared, such as monitoring and trapping programmes, and simple innovative ways to report on progress.

### 3.3 INTEGRATED AND COLLABORATIVE ACTION: WORKING WITH ALL PARTIES AT ALL LEVELS

ORC's third key priority is to provide an integrated and collaborative approach in delivering biosecurity outcomes. This means actively advocating for, and participating in, biosecurity initiatives and projects at all levels; from national and sub-national projects, to regional and district partnerships, to supporting and empowering communities and individuals.

#### Case study: Lindis Pass Conservation Group

The Lindis Pass Conservation Group received \$4,713 of ORC funding to go towards tools, protective clothing and a chemical handler certificate to push back and contain invasive sweet brier in Lindis Pass Scenic Reserve. The Lindis Pass Conservation Group is made up of community volunteers who have a passion for the area. Their mission is to enhance and promote the natural conservation, landscape and recreational values of the Lindis Pass. The tools are essential to enable the volunteers to safely and efficiently carry out weed control through cutting and poisoning these clusters of dense, thorned shrubs.



#### Action 3.3.1 Actively advocate for and participate in national and sub-national initiatives with MPI and others

- **Actively advocate for national and sub-national management plans** to control unwanted organisms that require a multi-regional approach to most efficiently and effectively control the species.
- **Participate in other national and sub-national initiatives** to effectively control unwanted organisms that require a consistent and coordinated multi-regional approach.
- **Form collaborative partnerships with neighbouring regional councils** where councils have shared biosecurity goals; particularly where these relate to specific species, or site or landscape-scale projects.

#### Action 3.3.2 Work cooperatively and in partnership with territorial local authorities, DOC, LINZ and other key agencies on initiatives to control harmful organisms

- **Actively advocate for improved biosecurity outcomes in district plans** and strategies to reduce the impacts of harmful organisms within Otago's districts.
- **Work in partnership with territorial local authorities, DOC, LINZ and other key agencies** on biosecurity initiatives where this provides efficient, effective and collaborative outcomes and optimises control.

#### Action 3.3.3 Support and work in partnership with Kāi Tahu on initiatives to control harmful organisms impacting on cultural values

- **Engage with Kai Tāhu regularly on biosecurity issues** to identify where Kai Tāhu may have an interest in biosecurity initiatives and how they wish to be involved.

- **Partner with Kāi Tahu on biosecurity initiatives** to address issues that impact on values of significance to Kai Tāhu.

#### Action 3.3.4 Support and empower Otago's people and communities to control harmful organisms

- **Provide funding and support to people and communities involved in volunteer initiatives** that optimise the control of harmful organisms to provide improved biodiversity, landscape, amenity, cultural and social outcomes.
- **Showcase and celebrate significant case studies and achievements** where communities and groups have provided improved biodiversity, amenity, cultural and social outcomes.
- **Empower individuals and communities** to actively control harmful organisms on their land and in their area by providing education, information, facilitation, support and training.

#### Case study: Otago Peninsula Biodiversity Group

With the help of more than 60 regular volunteers, Otago Peninsula Biodiversity Group (OPBG) have removed more than 12,500 possums from the Otago Peninsula from 2008 to 2018. OPBG received \$27,000 from ORC in 2018 so they could trial a pest aversion fence on a farm as a future biosecurity tool for managing pest species reinvasions. The funding also went towards analysis of trends, environmental monitoring data for birds, vegetation, and rodents, a base-line survey of lizard species' relative abundance and distribution on the Peninsula, and also contributed to the ongoing inventory of invertebrate species on the Peninsula. OPBG has been working hard for over six years to reduce possum numbers for the benefit of native flora and fauna.

Photo reference: L-R: 07, 08, 09



### 3.4 LANDSCAPE SCALE AND SITE SCALE: TARGET KEY AREAS FOR COLLABORATIVE AND COORDINATED CONTROL

ORC’s final key priority is to provide for collaborative and coordinated biosecurity control in key areas to protect significant environmental, social and recreational values. This means working together with other government agencies, organisations, interested parties and volunteers to better protect our special places from harmful organisms. This also means providing regional leadership and support for these initiatives.

Landscape scale and site scale initiatives can be progressed in several different ways:

Site-led programmes in the Pest Management Plan	How to add new site-led programmes to the Plan	Other site and landscape scale initiatives
For existing larger scale initiatives.	For new and future larger scale initiatives.	For smaller scale initiatives.
ORC has committed to four large scale site-led programmes in the Pest Management Plan.	Appendix 2 sets out how new site-led programmes can be included in the Pest Management Plan.	Further actions also set out how other smaller site and landscape scale initiatives can be developed or supported.

#### Site-Led Programmes in the Pest Management Plan

ORC has committed to four site-led programmes in the Pest Management Plan. The three site-led programmes in Dunedin are interrelated projects

to reduce the impact of harmful organisms on indigenous biodiversity. The site-led programme for lagarosiphon seeks to continue ORC’s support for collaborative lagarosiphon management projects led by LINZ and with input from other key parties.

New site-led programmes in other areas in Otago may be included in the Pest Management Plan over time. The criteria in Appendix 2 sets out how ORC will consider any new site-led programmes.

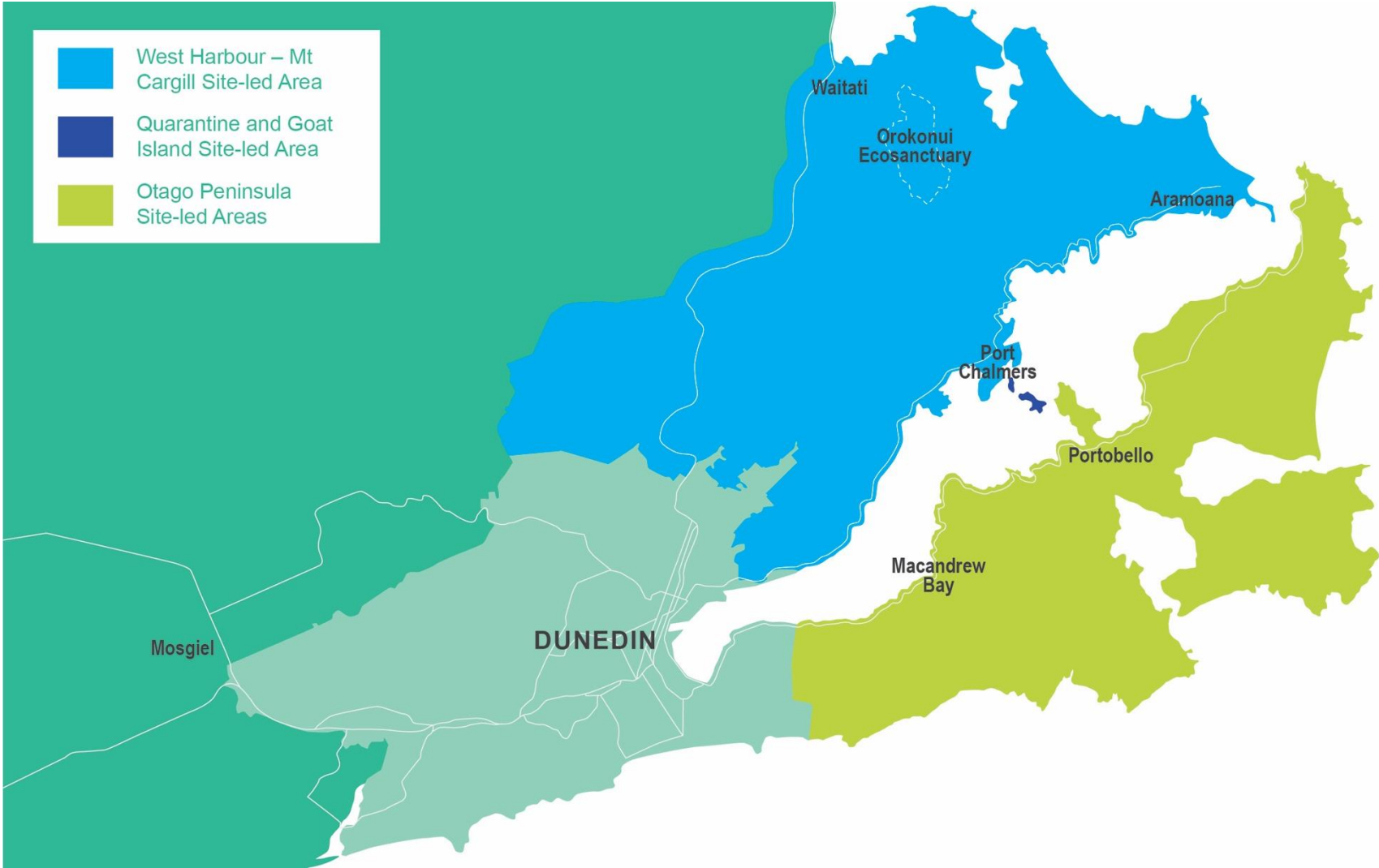
#### The Otago Peninsula

Not-for-profit groups have worked on the Peninsula for more than 10 years to protect indigenous biodiversity that call the Peninsula home. In collaboration with local and central government agencies, many residents are part of coordinated efforts to manage harmful predators and plants.

The Otago Peninsula site-led programme in the Pest Management Plan will support existing efforts to protect the important biodiversity values on the Peninsula. This includes ORC supporting the control of banana passionfruit, Chilean flame creeper, Darwin’s barberry, sycamore, gunnera, tradescantia, Bennett’s wallaby, feral cat, feral deer, feral goat, feral pig, hedgehogs and mustelids, and eradicating possums.

The Otago Peninsula is 9,000ha in area and stretches parallel to the Dunedin mainland. The Peninsula is steep and hilly, with tidal inlets, long sandy beaches, coastal cliffs and many small bays. Small towns are dotted along the western harbour edge. The Ōtākou Marae is located near Harington Point. The Peninsula’s biodiversity attracts many local, national and international visitors.

# The Otago Peninsula, West Harbour – Mt Cargill and Quarantine and Goat Island Site-led Areas



Tairoa Head at the tip of the Peninsula hosts the only mainland colony of albatross in the world, the endangered northern royal albatross/toroa. The Peninsula is also home to one of the rarest penguins in the world, the endangered yellow-eyed penguin/hoiho. The rare New Zealand sea lion/whakahao has returned to the mainland after being hunted to local extinction by early sealers and has established its first mainland breeding area on the Peninsula's southern beaches. Elephant and fur seals/kekeno are also found there, along with the Otago shag and other endemic shore and seabirds.

The Peninsula's forest remnants are home to populations of some of our smallest birds, including rifleman, brown creeper and tomtit. The Peninsula is also home to five reptile species, including the at-risk jeweled gecko, along with the recently discovered inconspicuous skink and the locally rare and at-risk green skink. The Peninsula is also home to many native invertebrates.

### West Harbour – Mt Cargill

This site-led programme supports and builds on the significant momentum of the Orokonui Halo Project, a collaboration between the Landscape Connections Trust, OSPRI and Otago Natural History Trust. The Orokonui Halo Project is a response to predator pests threatening the Orokonui Ecosanctuary, surrounding indigenous biodiversity, and impacting on local farmers. As threatened bird species within the ecosanctuary flourish and slip over into the surrounding area, they are also put at risk by predator pests outside the sanctuary.

This site-led programme will support the coordinated efforts of the groups and volunteers involved to improve biodiversity and habitats in this area. This includes ORC supporting the management of banana passionfruit, Chilean flame creeper, Darwin's barberry, tradescantia, Bennett's wallaby, feral cat, feral deer, feral goat, feral pig, mustelids, and possums.

The West Harbour – Mt Cargill site-led area covers approximately 12,500ha on the western side of Otago Harbour. The 302ha Orokonui Ecosanctuary is at the core of the project area, and with intensive predator control, acts as the nucleus for the expansion of indigenous wildlife across the site-led area and wider city and hinterland. The site-led area is a mix of beaches and inlets, the harbour edge, small towns like Port Chalmers and Pūrākanui, lifestyle blocks and hobby farms, larger landholdings, forests and native bush.

The area is home to 11 naturally uncommon ecosystem types, including coastal turfs, ephemeral wetlands, volcanic boulder fields, lagoons and estuaries. The area is also home to the endangered yellow-eyed penguin/hoiho, the rare New Zealand sea lion/whakahao, and the New Zealand fur seal/kekeno. There are 11 threatened bird species, including the South Island kaka and the South Island robin, and nine at-risk bird species including the Southern blue penguin and the South Island fernbird. The at-risk jeweled gecko and green skink, and threatened freshwater species are also found here.

### Quarantine Island and Goat Island

Quarantine Island and Goat Island are located in the Otago Harbour. These islands provide stepping stones for bird species, but also for rat species and mustelids to move from one side of the harbour to the other by either swimming or on board small boats/kayaks. The Norway rat and the house mouse are present on Quarantine Island. The key community outcome for the island is to eradicate rats, and to ensure that the island remains free from other pest animals.



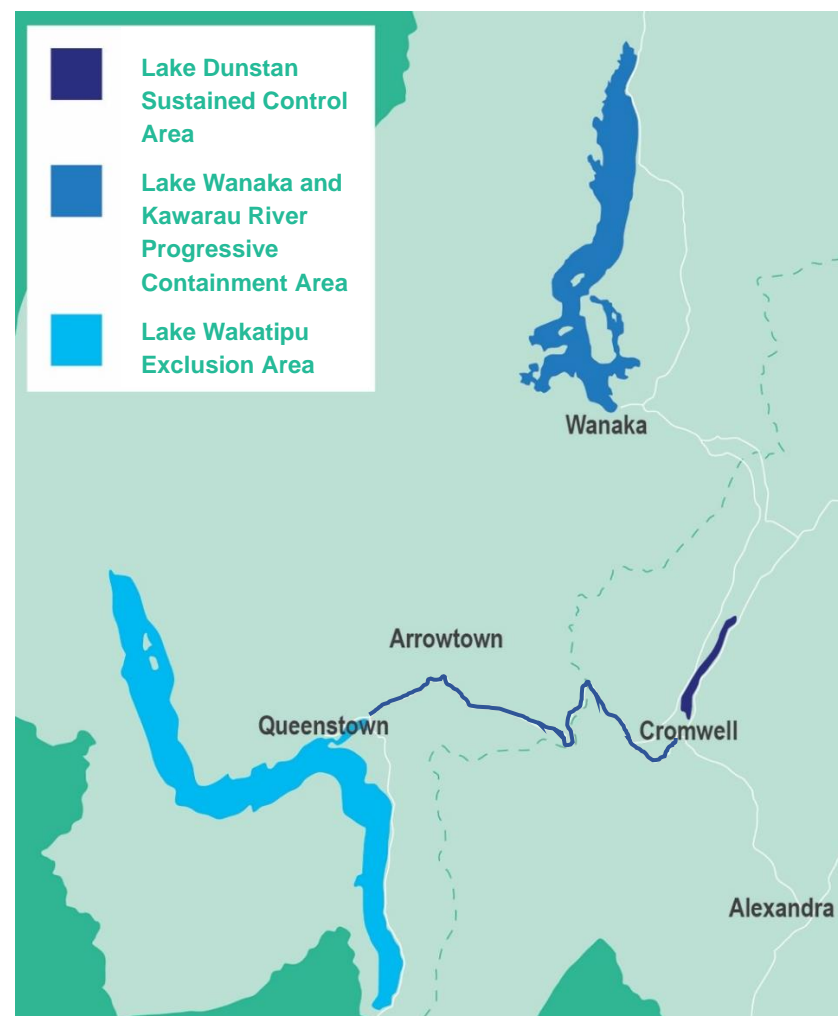
### Action 3.4.1 Provide regional leadership and support for the site-led programmes in the Pest Management Plan to protect indigenous biodiversity

- **Provide regional leadership and advocacy, and support community leaders** for the Otago Peninsula, West Harbour – Mt Cargill, and Quarantine Island and Goat Island site-led programmes.
- **Support the development of ‘whole of site’ management plans** for the Otago Peninsula, West Harbour – Mt Cargill, and Quarantine Island and Goat Island.
- Within each ‘whole of site’ management plan, **support the identification of smaller sites for specific objectives and activities** to protect the significant values of that place and encourage landowner participation in these initiatives.
- **Support the delivery of site-led objectives** by assisting and facilitating groups to undertake control works, undertaking monitoring of key species, leading some of these activities where needed, and undertaking control works where there are barriers to landowner participation.

### Site-led programmes in the Pest Management Plan to manage the spread of lagarosiphon

The site-led programme seeks to continue ORC’s support for collaborative lagarosiphon management projects led by LINZ and supported by other key parties. Lagarosiphon can be spread by currents and by boats and equipment. Its vigorous growth means that it can quickly shade out and outcompete native species, affecting ecosystems and the ability for people to swim, boat and use the water for recreation. It can also affect water supply intakes.

### The Lagarosiphon Site-led Areas



Lagarosiphon is present in Lakes Dunstan and Roxburgh and parts of Lake Wanaka. It is also present in the Clutha River/Mata-Au and the

Kawarau River. Isolated, individual plants are regularly removed from Frankton Arm in Lake Wakatipu to prevent it spreading to the lake.

Most of Otago's lake beds and rivers are administered by LINZ in accordance with the Land Act 1948. The current areas of focus for the control of lagarosiphon are Lake Dunstan, Lake Wanaka and Lake Wakatipu. LINZ has developed 10 Year Lagarosiphon Management Plans for each of these lakes, in collaboration with key parties including ORC, and control works are undertaken in accordance with these management plans. The control works for these programmes are largely funded by LINZ, with some support from other parties and ORC.

The site-led programme for lagarosiphon in the Pest Management Plan requires that these control works continue so that it is controlled in Lake Dunstan to keep important recreation areas clear, its extent is reduced in Lake Wanaka and the Kawarau River over time, and it is kept out of Lake Wakatipu. ORC will continue to support these programmes and advocate to LINZ for long-term suppression of lagarosiphon in Otago and, over time, eradication in key areas.

### Action 3.4.2 Advocate and support the continued suppression of lagarosiphon in Otago's lakes and rivers

- **Support LINZ in the development and review of 10 year Lagarosiphon Management Plans** for the control of lagarosiphon in Otago's lakes and rivers.
- **Continue to support and participate in Check, Clean and Dry campaigns** and advocate for campaign activities to be undertaken in additional areas to further prevent spread.
- **Continue to provide funding to lagarosiphon management** where this supports coordinated action, whilst recognising that LINZ is the key agency undertaking management.

- **Work collaboratively with LINZ on lagarosiphon surveillance** in Otago's lakes and rivers so that potential areas of spread are monitored, and control works are undertaken by LINZ as necessary.

### Action 3.4.3 Other site and landscape scale initiatives

The site-led programmes proposed in the Pest Management Plan seek to support and further bolster existing initiatives where ORC can work in collaboration with key parties. This does not preclude the ability for ORC to support new site and landscape scale initiatives, whether these are long-term projects over large areas, or shorter-term and smaller-scale projects across a smaller area. Particularly where these projects will result in improved biodiversity outcomes.

- **Consider the inclusion of new site-led programmes in the Pest Management Plan** where these can support collaborative and sustained medium term (10 years+) action across a highly valued site or landscape.
- **Provide the ability to include new site-led programmes without a plan review** to the Pest Management Plan in accordance with the guidelines in Appendix 5.4.
- **Support, facilitate and participate in other non-regulatory landscape scale approaches** to manage harmful organisms.
- **Provide facilitation support to smaller, non-regulatory site-based approaches** at a community, group and individual level where appropriate.

**PART FOUR:  
IMPLEMENTATION**



## 4 IMPLEMENTATION

### 4.1 IMPLEMENTATION OF THE BIOSECURITY STRATEGY ACTIONS

The actions contained in Section 3 of this strategy outline how ORC will deliver its regional leadership role, and guides ORC's biosecurity projects and activities. ORC commits to operating in accordance with these actions to mitigate the impacts of harmful organisms over the next 10 years.

In doing this, a number of priority projects and activities have been identified for action over the next five years. This does not negate ORC's responsibility to deliver all the actions within the strategy over time, but seeks to address current issues and opportunities that have been identified in the development of this strategy and the Pest Management Plan.

ORC will prepare an operational plan in accordance with section 100B of the Biosecurity Act within 3 months of the Regional Pest Management Plan becoming operative, that sets out how ORC will administer the Pest Management Plan and the other biosecurity activities outlined in the strategy over the coming 12 months. This will be updated and reported on annually.

This strategy will be reviewed and updated if required after the first five years and subsequently thereafter. New projects and activities may be identified and prioritised, and the outcomes of these reviews will also be used to inform the 10 year review of the Pest Management Plan.

### 4.2 PRIORITY PROJECTS FOR THE FIRST FIVE YEARS OF THE STRATEGY

In addition to the more general outcomes in this strategy that guide ORC's biosecurity activities, the following section identifies key projects and actions within the first five years of implementation to address important issues and opportunities that have been identified while developing the Pest Management Plan and this strategy.



## Proactive Biosecurity Management

Key project / action	ORC Partner / support	Timeframe
Establish and facilitate a biosecurity technical working group to meet twice a year to share ideas and innovations, identify synergies and collaborate on projects.	DOC, MPI, farming, industry, tourism and environmental organisations, Kāi Tahu <u>ki</u> Otago, New Zealand Transport Authority	Within 1 year
Develop a Possum Control programme focusing on OSPRI completed areas for long-term bovine tuberculosis eradication and biodiversity gains. A volunteer landowner programme is anticipated, starting with the Pest Management Plan site-led areas, informed by successful models in other regions.	OSPRI, Landowners, Other regional councils	Within 18 months
Partner with other regional councils to actively advocate for a national marine pathway management plan to minimise the risk of marine pest spread. If a national plan is not instigated: <ul style="list-style-type: none"> <li>look to partner with adjacent councils to develop a sub-national plan;</li> <li>or a regional pathway management Plan or a change to the Regional Pest Management Plan.</li> </ul> <p>ORC will undertake an initial scoping exercise to determine marine species threats in the Otago Harbour and the wider Otago area to determine what management approaches may be appropriate in the Pathway Management Plan.</p>	MPI, DOC Other regional councils, Te Rūnanga o Ngāi Tahu	Within 3 years
Establish a surveillance programme for exclusion pests in partnership with neighbouring regional councils where this is efficient and effective. The surveillance programme could also include organisms of interest where these require ORC surveillance.	Neighbouring regions	Within 2 years

## Responsive and Flexible

Key project / action	ORC Partner / support	Timeframe
Prepare updated internal operating procedures for administering the Pest Management Plan for enforcing plan rules, working proactively with land occupiers, and utilising the exemption powers under the Biosecurity Act.		Within 12 months
Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in	Neighbouring regional councils where appropriate, DOC	Over the next 5 years

the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium.

Implement a transition programme for land occupiers within the new gorse and broom free areas and for land containing contorta pine shelters belts and planted conifers under 1ha to assist with proactive management prior to new rules being established.		Within 2 years
ORC will undertake work to compile a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.		
Develop guidance material on identifying other wilding trees within Otago in addition to wilding conifers, and produce guidance on control and replacement species.	DOC	Within 3 years
Develop and facilitate an urban gorse and broom programme throughout Otago.		Within 5 years
Develop a programme to facilitate the establishment of landowner-led rabbit control groups. This shall be modelled on best practice examples within Otago and other regions.	Other regional councils, DOC Maniototo Pest Management Company	Within 1 year

### Integrated and Collaborative Action

Key project / action	ORC Partner / support	Timeframe
Support the enviro schools programme with key messages, information and tools relating to biosecurity issues in Otago.	District enviro school coordinators	Within 1 year
Promote the newly developed ECO Fund to individuals, groups and non-governmental organisations involved in voluntary initiatives.		Within 6 months
Develop and implement a volunteer facilitation programme to support community volunteer groups in undertaking biodiversity projects and biosecurity control.	DOC	Within 2 years
Develop a shared data platform for biodiversity and biosecurity activities that can be used by ORC staff, community groups and enviro schools to share and analyse information, issues, successes, surveillance and monitoring.	Other district and regional councils, groups, DOC, Kāi Tahu ki Otago	Within 3 years
Actively advocate for and co-lead the development of national or multi-regional pest management responses to address multi-regional impacts of particular species. e.g. wallabies.	Other regional councils, MPI, Te Rūnanga o Ngāi Tahu	Within 2 years

## Landscape Scale and Site Scale

Key project / action	ORC Partner / support	Timeframe
Contribute to the development of the Predator Free Dunedin 2050 'whole of site' management plan/s.	Predator Free Dunedin 2050, Landscape Connections Trust, Otago Peninsula Biodiversity Trust	Within 6 months
<p>Following the establishment of the 'whole of site' management plan/s, establish a plan of action for ORC's role in the delivery of the plan outcomes. This shall set out ORC's role in:</p> <ul style="list-style-type: none"> <li>• undertaking control works;</li> <li>• monitoring of key species;</li> <li>• providing guidance on predator prey relationships and how these should be addressed when undertaking control works (e.g. mustelid / rabbit pest control relationship);</li> <li>• leading some of these activities where needed; and</li> <li>• directly undertaking control where there are barriers to landowner participation.</li> </ul>	Predator Free Dunedin 2050, Landscape Connections Trust, Otago Peninsula Biodiversity Trust	Within 12 months of the above action
Work in partnership with Dunedin City Council on its landscape scale urban linkages plan to support Predator Free Dunedin.	Dunedin City Council, Predator Free Dunedin 2050	Within 5 years
Develop guidance on how ORC can support groups with smaller site-led initiatives to manage harmful organisms.		Within 12 months

## APPENDIX 1: HARMFUL ORGANISMS IN OTAGO

### PESTS IN THE PEST MANAGEMENT PLAN

Common Name	Scientific Name	Primary Programme
<b>Plants</b>		
African feather grass*	<i>Cenchrus macrourus</i>	Exclusion
African love grass*	<i>Eragrostis curvula</i>	Progressive containment
Banana passionfruit	<i>Passiflora tripartita</i> var <i>mollissima</i> , <i>P. tripartita</i> var <i>azuayansis</i> , <i>P. tarminiana</i> *, <i>P. pinnatistipula</i> , <i>Passiflora</i> x <i>rosea</i> , <i>P. caerulea</i>	Site-led
Bomarea*	<i>Bomarea caldasii</i> <i>B. multiflora</i>	Progressive containment
Boneseed*	<i>Chrysanthemoides monilifera</i>	Progressive containment
Broom (common and montpellier)	<i>Cytisus scoparius</i> <i>Teline monspessulana</i>	Sustained control
Bur daisy	<i>Calotis lappulacea</i>	Progressive containment
Cape ivy	<i>Senecio angulatus</i>	Progressive containment
Chilean flame creeper	<i>Tropaeolum speciosum</i>	Site-led
Chilean needle grass*	<i>Nassella neesiana</i>	Exclusion
Contorta (lodgepole)	<i>Pinus contorta</i>	Progressive Containment

pine*		
Corsican pine	<i>Pinus nigra</i>	Progressive Containment
Darwin's barberry*	<i>Berberis darwinii</i>	Site-led
Egeria	<i>Egeria densa</i>	Exclusion
False tamarisk	<i>Myricaria germanica</i>	Exclusion
Gorse	<i>Ulex europeus</i>	Sustained control
Hornwort	<i>Ceratophyllum demersum</i>	Exclusion
Lagarosiphon*	<i>Lagarosiphon major</i>	Site-led
Larch (excl. sterile hybrids)	<i>Larix decidua</i>	Progressive Containment
Moth plant*	<i>Araujia hortorum</i>	Exclusion
Mountain pine and dwarf mountain pine	<i>Pinus uncinata</i> <i>Pinus mugo</i>	Progressive Containment
Nassella tussock*	<i>Nassella trichotoma</i>	Progressive containment
Nodding thistle	<i>Carduus nutans</i>	Sustained control
Old man's beard*	<i>Clematis vitalba</i>	Progressive containment
Perennial nettle	<i>Urtica dioica</i>	Progressive containment
Ragwort	<i>Senecio jacobaea</i>	Sustained control
Scots pine	<i>Pinus sylvestris</i>	Progressive Containment
Spartina	<i>Spartina spp</i>	Progressive containment
Spiny broom	<i>Calicotome spinosa</i>	Eradication



Sycamore	<i>Acer pseudoplatanus</i>	Site-led
Gunnera	<i>Gunnera tinctoria</i>	Site-led
Tradescantia*	<i>Tradescantia fluminensis</i>	Site-led
White-edged nightshade*	<i>Solanum marginatum</i>	Progressive containment
Wilding conifers	See table 3 in the Pest Management Plan	Progressive containment
Wild Russell lupin	<i>Lupinus polyphyllus</i>	Sustained control
<b>Animals</b>		
Bennett's wallaby	<i>Macropus rufogriseus rufogriseus</i> ,	Eradication
Feral cat	<i>Felis catus</i>	Site-led
Feral deer	<i>Cervus elaphus</i> , <i>C. nippon</i> , <i>C. dama</i>	Site-led
Feral goat	<i>Capra aegagrus hircus</i>	Site-led
Feral pig	<i>Sus scrofa</i>	Site-led
Feral rabbit	<i>Oryctolagus cuniculus</i>	Sustained control
Hedgehog	<i>Erinaceus europaeus</i>	Site-led
Mustelids (ferret, stoat, weasel)	<i>Mustelo furo</i> , <i>M. ermine</i> , <i>M. nivalis</i>	Site-led
Possum	<i>Trichosurus vulpecula</i>	Site-led
Rat (Norway, ship and Kiore)	<i>Rattus norvegicus</i> , <i>R. rattus</i> <i>R. exulans</i>	Site-led
Rook*	<i>Corvus frugilegus</i>	Eradication

\* unwanted organisms

## ORGANISMS OF INTEREST IN OTAGO

Common name	Scientific name
<b>Plants</b>	
Blackberry	<i>Rubus fruticosus</i>
Boxthorn	<i>Lycium ferocissimum</i>
Briar	<i>Rosa rubiginosa</i>
Buddleia	<i>Buddleja davidii</i>
Burdock	<i>Arctium minus</i>
Convolvulus	<i>Convolvulus arvensis</i>
Cotoneaster	<i>Cotoneaster</i> spp.
Cotton thistle	<i>Onopordum acanthium</i>
Giant hogweed	<i>Heracleum mantegazzianum</i>
Hawthorne	<i>Crataegus monogyna</i>
Hieracium (Hawkweed)	<i>Hieracium</i> spp.
Heath rush	<i>Juncus squarrosus</i>
Horehound	<i>Marrubium vulgare</i>
Japanese honeysuckle	<i>Lonicera japonica</i>
Japanese knotweed	<i>Fallopia japonica</i>
Lake snow	<i>Lindavia intermedia</i>
Periwinkle	<i>Vinca major</i>

Purple loosestrife	<i>Lythrum salicaria</i>
Reed sweetgrass	<i>Glyceria maxima</i>
Rowan	<i>Sorbus aucuparia</i>
Saltmarsh rush	<i>Juncus gerardii</i>
Spanish heath	<i>Erica lusitanica</i>
Thyme	<i>Thymus vulgaris</i>
Tree Lupin	<i>Lupinus arboreum</i>
Veldt grass	<i>Ehrharta erecta</i>
Wild ginger	<i>Hedychium gardnerianum</i>
Willow	<i>Salix</i> spp.
Yellow bristle grass	<i>Setaria pumila</i>

### Animals

Goose Canada White/domestic	<i>Branta canadensis</i> <i>Anser</i> spp.
Mouse	<i>Mus musculus</i>
Wasp	<i>Vespula</i> spp.

### Marine

Asian paddle crab	<i>Charybdis japonica</i>
Mediterranean fanworm	<i>Sabella spallanzanii</i>

Sea squirts	<i>Styela clava</i> , <i>Eudistoma elongatum</i> , <i>Pyura doppelgangera</i> and <i>Didemnum vexillum</i>
Sea couch	<i>Agropyron pungens</i>
Undaria	<i>Undaria pinnatifida</i>
<b>Freshwater</b>	
Goldfish	<i>Carassius auratus</i>

## UNWANTED ORGANISMS

For a full list of unwanted organisms in New Zealand please visit the Ministry for Primary Industry's website:

<https://www.mpi.govt.nz/protection-and-response/finding-and-reporting-pests-and-diseases/registers-and-lists/>

## APPENDIX 2: GUIDANCE FOR THE INCLUSION OF SITE-LED PROGRAMMES IN THE PEST MANAGEMENT PLAN

ORC may consider including an additional site-led programme or amend an existing site-led programme in the Pest Management Plan where this meets the requirements of the Biosecurity Act and results in positive benefits to the environment and people.

This appendix provides guidance for when a site-led programme may be included without the need to undertake a plan change to the Pest Management Plan:

- The area has significant value at a community, district, regional or national scale. For example:
  - Significant indigenous vegetation.
  - Significant habitats of indigenous fauna.
  - Outstanding natural character, features and landscapes.
- There is strong volunteer and/or community support for the programme, including from landowners who are willing to provide access to private property.
- The programme will result in environmental, social and/or cultural benefits.
- The programme meets the requirements of the Biosecurity Act 1993 and the National Policy Direction for Pest Management 2015.
- There is an agreement with the Otago Regional Council about:
  - How the site will be managed.

- How the programme will be delivered.
- The nature and level of support needed from ORC.
- The programme is resourced for its duration.



## ACKNOWLEDGEMENT

ORC would like to sincerely thank the communities and stakeholders whose input has been invaluable in preparing the Biosecurity Strategy.

While the Biosecurity Strategy is a non-statutory document, ORC is committed to working collaboratively with stakeholders, groups, communities and individuals to implement the Strategy to achieve good biosecurity outcomes in Otago.

Photo source list

01: Northland Regional Council

02: DOC

03: DOC

04: Environment Southland

05: DOC

06: Environment Southland

07: Otago Peninsula Biodiversity Group

08: Otago Peninsula Biodiversity Group

09: Otago Peninsula Biodiversity Group

# COMMUNICATIONS AND ENGAGEMENT PLAN

## Announcing the operative Regional Pest Management Plan and Biosecurity Strategy

### Background

A new proposed Regional Pest Management Plan (Plan or Pest Plan) and Biosecurity Strategy are in the final stages of approval before becoming operative. Once they are operative, we need to communicate this to the Otago community.

We also need to communicate the content of the Plan and what the rules are for various pest plants and animals, and how the Pest Plan fits within the wider Biosecurity Strategy.

There has been extensive consultation on both the Plan and Strategy with key stakeholders and the wider community (<https://yoursay.orc.govt.nz/pestplan>). Combined with the contact details for those who submitted on the Plan and/or Strategy, we have a database we can target our communications to, along with the wider community.

Hearings on the Plan and Strategy have been held in Dunedin and Queenstown and the Hearing Panel is now in deliberations. It is expected that a final document will be brought to full Council on 25 September 2019 for approval. The Strategy will then be operative. There will be an appeal period for the Plan and if no appeals are received or once appeals are resolved, the Plan will be made operative.

*Note: there are communication plans already written for a number of pest plants and animals (e.g. wallabies, rabbits, Old Man's Beard) and more will be developed once the pest Plan is operative. This plan includes a timeframe for comms on specific pests, and this will be added to with other pests as the communications materials are developed.*

### Objective

To inform the community that we have a new Pest Plan and Biosecurity Strategy, and ensure people understand their responsibilities for pest management under the new Plan.

We want to ensure all Otago landowners/occupiers understand who is responsible for each aspect of the Plan and Strategy. Achieving this will enable us to support the biosecurity and biodiversity team and ORC's goal of enhancing and protecting our environment from the impacts of harmful organisms.

### Audience

- Submitters on the Plan and Strategy
- People who registered to stay up-to-date with the progress of the Plan and Strategy

- Otago landowners/occupiers
- Those within the site-led programme areas (Otago Peninsula and West Harbour/Mt Cargill residents)
- Those in the extended gorse and broom free areas
- TAs and neighbouring regional councils (we will also share relevant communications with them)
- Internal communications (staff and councillors)
- State owned enterprises, KiwiRail, LINZ etc.

## Opportunities

To enable/encourage more proactive engagement with communities.

When a new Pest Plan and Strategy are in place we can inform the public that we've doubled the number of pests addressed through the Plan and doubled the funds allocated to the operation of the Plan.

To inform the public that there are new rules, such as good neighbour rules, demonstrating we are committed to doing more to ensure pests are managed appropriately.

To promote our collaboration with Predator Free Dunedin and communities in these areas through the Dunedin site-led programmes.

To link biosecurity with biodiversity (one of ORC's priorities), to build the connection between the two: you need good biosecurity management to protect biodiversity.

## Risks/barriers

Confusion between previous rules and new rules, which may be more stringent.

We need continued communications around the role of site-led programmes and the pests identified for this control programme. E.g. there was some confusion around the inclusion of feral cats and feral deer under site-led programmes, where many people did not understand that their pest identification was restricted to the site-led areas. The inclusion of feral cats in the pest plan has been a contentious issue throughout the consultation process. We can mitigate this by preparing messaging as to the reason for their inclusion to debunk misinformation.

It is unlikely this will happen but there is a small chance that there could be substantial changes (new addition pests, change in multiple rules) following hearings and/or the appeals period, which means a short turn around on putting together information for the pest hub.

The new Plan will be signed off during the elections period so we must be careful that we stick to elections protocol in regard to councillors being mentioned in comms.






The timeline after Council sign-off may be tricky for the public to understand in terms of when they need to start following the new rules. We will need to make it clear that the new plan will not be legally in effect until the appeals period is over. Assuming all goes well, and we get no appeals the whole plan will take legal effect after this, if there are some appeals made, the rest of the plan that

is not being appealed will still be able to take legal effect. If this does happen, we will need to make it clear on our website and to staff which pests are affected by the appeals process (if any).

During the appeals period ORC cannot comment on the contents of the plan to those offering feedback, we can only direct them to how to put in an appeal if they wish.

## Key messages

- Otago has a new Regional Pest Management Plan, which sets out the framework for how pest plants and animals specified in the plan will be managed in Otago over the next 10 years.
- To support the new Plan, ORC has developed a Biosecurity Strategy. This sets out our biosecurity priorities and a programme of action for how we deliver biosecurity activities over the next 10 years.
- Biodiversity is one of ORC's top priorities and we can't achieve rich biodiversity in Otago without effective biosecurity. Our Pest Plan and Biosecurity Strategy set out measures to manage the impacts of unwanted harmful organisms on our environment. The rules in the Pest Plan are in place to protect what we treasure.
- Our new Regional Pest Management Plan and Biosecurity Strategy are available to view on our website at [www.orc.govt.nz](http://www.orc.govt.nz)
- Similar to the old pest plan, land owners/occupiers are responsible for managing most pests on their land. This includes rabbits, old man's beard, bomarea and cape ivy.
- Find out more about pests in Otago by visiting our new pest hub. Here you can find out how to identify pests, what rules apply to them and management options. [www.orc.govt.nz/pesthub](http://www.orc.govt.nz/pesthub)
- Our pest plan has different ways to manage pest plants and animals, which are outlined in the below table

				
<b>EXCLUSION PROGRAMMES</b>	<b>PROGRESSIVE CONTAINMENT PROGRAMMES</b>	<b>ERADICATION PROGRAMMES</b>	<b>SUSTAINED CONTROL PROGRAMMES</b>	<b>SITE-LED PROGRAMMES</b>
Preventing the establishment and spread of a pest	Containing or reducing the distribution of the pest over time	Reducing the infestation level to zero	Providing ongoing control of the pest to reduce its impact and spread	Excluding, eradicating or controlling pests in a specific place to protect the values of that place

## Secondary messaging

- Under the new Pest Plan there are some new rules that you need to be aware of like good neighbour rules for gorse, broom, rabbits, wilding conifers and other pests. Here's what you need to know about good neighbour rules (GNRs):
  - They only apply to some pests
  - But they do apply to all landowners, even the Crown



- They can help you out if you are managing a pest around your boundary that has a GNR and your neighbour isn't managing that pest as well
- There are different lengths from the boundary that a GNR applies to, depending on the pest
- Rules around rabbits have changed a bit in our new pest plan. Here's what you need to know:
  - Landowners are still responsible for rabbit management on their property
  - Rabbit densities should still be at or below level 3 on the Modified McLean Scale
  - Good neighbour rules now apply, so if you are controlling rabbits within 500m of your boundary, your neighbour must also do so
  - Management plans are no longer required which means we can take swifter enforcement action when needed
- If you're living on the Otago Peninsula or in the West Harbour/Mt Cargill areas in Dunedin, you have the opportunity to be a part of an exciting new site-led programme under our new pest plan. Site-led programmes have been set up in these areas due to their special biodiversity values and engaged communities. There are plants and animals that are classified as pests specifically in these areas to protect their values. ORC will support communities in leadership, management plans and with other objectives identified by the community.
- We have 11 kinds of wilding conifer trees in our new pest plan which is a big step up from our last plan which only covered contorta pine. Wilding conifers are under a progressive containment management programme. This means that our goal is to contain or reduce the distribution of this pest over time. There are a range of methods we will use to achieve this goal. You can find out about all of them at [www.orc.govt.nz...](http://www.orc.govt.nz...)

## Tactics/approach

Channel	✓
Email updates to: <ul style="list-style-type: none"> <li>- List of those who want to receive updates</li> <li>- Submitters</li> </ul> Key stakeholders (TAs, iwi Predator Free Dunedin)	
YourSay Yoursay.orc.govt.nz/pestplan and /hearings hosts all of the information on the consultation and hearings process and will continue to hold panel minutes etc. up until the plan is notified	
Media Release upon Council sign-off	
Internal comms (staff, exec, councillors)	
Public notice 1 October – Public notice advising pest plan notification Place in: <ul style="list-style-type: none"> <li>- ODT</li> <li>- Clutha leader</li> <li>- Cromwell Bulletin</li> <li>- Star</li> <li>- Mountain Scene</li> <li>- Oamaru Mail</li> <li>- The News</li> <li>- Wanaka Sun</li> </ul>	
ORC website – new Pest Hub	

<ul style="list-style-type: none"> <li>- To be used as the primary resource to refer people to for information on pests</li> <li>- Work with Channels to either use website template from Northland or develop our own with what our website currently offers</li> </ul>	
<p>Pest of the month campaign</p> <ul style="list-style-type: none"> <li>- First Saturday of the month</li> <li>- Pest of the month to be topical to that time of year e.g. Old Man's Beard flowers in summer months</li> <li>- Work with Channels to develop a template for monthly ads on different pest species (similar to the info sheet for Bomarea but smaller) for the ODT</li> <li>- Also share on social</li> <li>- Review during June to see if we continue with this depending on next year's budget</li> </ul> <p>Share in On-Stream and Waterlines where relevant</p>	
<p>Distribution of plan and strategy</p> <p>Mail to libraries and ORC offices</p>	
<p>Social media</p> <ul style="list-style-type: none"> <li>- Boosted posts promoting the pest hub</li> <li>- Pest of the month ads (see more below)</li> </ul>	
<p>Resources, e.g. brochure, flyer</p> <ul style="list-style-type: none"> <li>- Relevant resources available for specific pest campaigns e.g. wallaby ute guide</li> <li>- 'Plant me instead' booklets from Weedbusters to educate on pest plants</li> </ul> <p>Look into the ability to make pages from the Pest Hub printable as an info sheet as they are on Northland's pest hub</p>	
<p>Video</p> <ul style="list-style-type: none"> <li>- Re-use existing videos about pest plants and animals to remind people of what to look for and how to treat/eradicate them</li> </ul>	
<p>Spokespeople (e.g. councillor interviews for print/radio)</p>	
<p>Community events (our own/tag onto others)</p>	
<p>Formal meetings/drop-ins/workshops</p> <ul style="list-style-type: none"> <li>- Investigate collaboration with PFD and DCC to hold workshops in the site-led areas, Otago Peninsula and West Harbour/Mt Cargill, once ORC has a clearer picture of the specific ways it will start implementing the site-led programmes.</li> </ul>	

## Timeline/activity calendar

*The below timelines assume all goes according to plan in the process*

25 September – Council sign off on pest plan

28 September – Public notice advising pest plan notification

1 October – Pest plan notified and appeals period open

22 October – appeals period closed – if we have no appeals the plan is now legally operative

Onwards – new Council puts the seal on the plan by the second Council meeting of the new triennium

Month	Pest Plan	Rabbits	Wallabies	Rooks	Old Man's Beard	Lagarosiphon
		Comms plan available	Comms plan available	Comms plan available	Comms plan available	Comms plan available
<b>Main Audience</b>	All Otago	Central Otago	North Otago	Maniototo area	All Otago	Queenstown lakes/ Central Otago summer rec users
<b>Aug</b>						
<b>Sept</b>	Pest plan sign off by Council					
<b>Oct</b>	Pest of the month – Rooks On Stream pest plan update					
<b>Nov</b>	Pest of the month – Banana passionfruit					
<b>Dec</b>	Pest of the month – Lagarosiphon					
<b>Jan</b>	Pest of the month – Old Man's Beard					
<b>Feb</b>	Pest of the month – Chilean flame creeper					
<b>Mar</b>	Pest of the month – Rabbits					
<b>April</b>	Pest of the month – Gorse					
<b>May</b>	Pest of the month – Broom					
<b>June</b>	Pest of the month – Wallabies					
<b>July</b>	Amplified comms for biosecurity month (budget pending)					

## Measurement

High page views (upwards of 400 a month) on the Pest Hub landing page

Increased enquiries to the Biosecurity team

Media interest in pest plan – picking up our media releases

People are aware of the rules in the pest plan and 50% of enforcement action is not the result of them being unaware of them/do not understand them

## **Budget**

L2SL1 - \$11,000

Pest of the month ODT options

- Saturday 22cm(h) x 11cm(w) ads - \$865.26 ea. x 9 = \$7,787.34 (preferred)
- Saturday ¼ page ads – \$1,835.40 ea. x 9 = \$16,518.60 (only if extra budget becomes available)

Public notices for decision and appeals notification - \$2,848.37

Rest of available funds to be set aside for boosting Facebook posts, other ad hoc comms as needed and potential for workshops/drop-ins with site-led programme communities

## **Project team and approval processes**

Shayde → Bex → Lisa → Richard → Gavin → Sally

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P001.1	Jeff Howell	The wasps compete with native birds for food, they have been known to kill hatchlings. They kill other insect life. they decrease the biodiversity of an area. They are a danger to people causes a lot of time lost and health risks. There is so much land that is not under direct and close supervision. there is a method of control that can quickly clear an area of them. the number of wasp nests are increasing because of the change in the climate. I have already taken down my bird sugar water feeders because they are covered with wasps. I cannot find any wasp nests on my property.	I think wasps should be included in the pest species that the council look at controlling.	Additions to Plan	Reject	Wasps are widespread nationally and the Hearing Panel accepts the staff recommendation that it is more appropriate to provide information and advice on methods to control wasps rather than taking a regulatory approach. The Panel notes that given wasps are a harmful organism in Otago, they are identified as an Organism of Interest. Wasps can therefore be watch listed for surveillance in case future control may become necessary in the Plan and so ORC can support occupiers where needed with their control through education advocacy and advice.
P002.1	Michael Clark	I would like to see Hawthorne on the pest list. Especially in the situation where the farm land is not managed and used professionally. With the invasive nature of the plant, areas can become a habitat for other pests, rabbits , goats and opossums. This plants seed is spread by birds. Attached is photos beside the Shotover River. This area has become over run hawthorne and sheep can no longer graze this land. It has only taken a short 10 - 12 years for this to happen.	I would like to see Hawthorne on the pest list.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of hawthorn and do not currently undertake surveillance of hawthorn in Otago, but are aware of its presence and impacts, particularly in the Queenstown Lakes District and in Dunedin City. Hawthorn is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel supports the staff recommendation that ORC prepare guidance on the identification, effects and control methods for hawthorn on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P008.2	Simon Sebbings	1. Giant Hogweed (Heracleum mantegazzianum). Eradication. This very large plant has huge seed heads capable of spreading thousands of seeds. It is a major pest along rivers in the UK. I have seen this plant growing on verges in the centre of Dunedin- especially around Pitt Street. Contact with the plant can cause sun sensitivity with a blistering rash. Identification is easy and as it is not yet widespread I believe it must be targetted for eradication- especially if seen by rivers. It is on the pest list in other areas of NZ - such as Northland.	Add giant hogweed to the Plan as an eradication species.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of giant hogweed and do not currently undertake surveillance of hogweed in Otago, but are aware of its presence in and around Dunedin. Giant hogweed is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel supports the staff recommendation that ORC staff prepare guidance on the identification, effects and control methods for giant hogweed on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P008.3	Simon Sebbings	2. Hemlock (Conium maculatum). This is out of control along rivers and in shady areas in Central Otago- especially around the Clutha and Cardrona rivers and in many shady places. It is extremely poisonous and looks awful. It significantly impacts on the appearance of riverside areas and seems to be spreading rapidly. It poses a hazard due to its toxicity. I believe a programme is urgently needed to contain this pest and I am surprised it was not included in the pest plant management list. It is so widespread I doubt it can be eradicated.	Add hemlock to the Plan.	Additions to Plan	Reject	Hemlock is widespread nationally and the Panel considers it more appropriate to provide information and advice on methods to control hemlock rather than taking a regulatory approach.
P062.1	Sheree Mary Glozier	I would like to submit my proposal requesting an amendment be made to Section 4.1. I would like to have the Common Wasp / German Wasp declared as a pest and an appropriate eradication programme be devised for this pest. There is a very high number of wasps within the District and they have a huge social impact on our community. They are a nuisance, especially around food and also have environmental impacts. Action needs to be taken as we are surrounded by reserves / forests and farm land which make it difficult to locate nests. I think this a VERY IMPORTANT ISSUE for Otago Regional Council to address to maintain the safety of the community. I would like added to the Pest Management Plan that Wasps be identified as a pest and an appropriate plan of action implemented to control these.	Add Common Wasp / German Wasp to the Plan as eradication species.	Additions to Plan	Reject	See response to P001.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P067.1	Christopher Green	Include Magpies as a pest animal.	Add Magpies to the Plan.	Additions to Plan	Reject	Magpies are widespread nationally and the Panel accepts the staff recommendation that it is appropriate to provide information and advice on methods to control magpies rather than taking a regulatory approach.
P069.1	Hamish Wilson	Canada Geese should be included as they cause a lot of damage to native pasture and foul up rivers. Crack Willow should be included as they clog up rivers and choke sun for river health.	Add Canada geese and crack willow to the Plan.	Additions to Plan	Reject	The Panel notes that Crack willow is listed in the National Pest Plant Accord and is an Unwanted Organism, and Sections 52 and 53 of the Biosecurity Act apply. Crack willow is widespread nationally and the Panel accepts the staff recommendation that ORC staff consider that a regulatory approach in the Plan is not appropriate. ORC regularly undertakes control of crack willow along rivers in Otago to reduce flood effects. The Panel notes that Canada geese are included as an Organism of Interest in the Plan. See response to submission 122.2 regarding Canada geese.
P071.1	Jeff Munro	I support all that is proposed, but wish to add for eradication 1) Agapanthus, which is difficult to get rid of and planted by Dunedin City Council. 2) Pampas Grass should also be included for eradication, as it is an introduced pest present in all sorts of public places. Global warming may exacerbate the spread of Pampas Grass, as is the case in Waikato. Native toitoi species should be used instead. Feral dogs should also be included- like cats, they are killers of birds especially sea birds and seals.	Add agapanthus and pampas grass as eradication pests and add feral dogs to the Plan.	Additions to Plan	Reject	The Panel notes that ORC staff are not aware of feral dogs in Otago. Staff are also not aware of pampas grass in Otago that has naturalised. Agapanthus is widespread nationally and the Panel considers it more appropriate to provide information and advice on methods to control agapanthus rather than taking a regulatory approach.
P075.1	Rosemary Halley	Include Ivy as a pest plant. It takes over everything it comes in contact with, e.g. paint off fence if one tries to remove it.	Ivy must be included in the good neighbour rules.	Additions to Plan	Reject	English ivy is widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control English Ivy rather than taking a regulatory approach.
P094.2	Roy Smith	Plants should also include Briar Rose (taking over on the wanaka side of the crown range summit and above alpine retreat in Queenstown where Pine has been felled, and Willow which takes over on lake shores and wetlands crowding out native species providing habitat for our wildlife.	Add briar rose as a pest plant within the Plan.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of briar and do not currently undertake surveillance of briar in Otago, but are aware of its presence and impacts, particularly in Queenstown Lakes District and Central Otago. Briar is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel accepts the staff recommendation that the ORC prepare guidance on the identification, effects and control methods for briar on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear. The species of willow referred to in the submission is not clear. However, The Panel notes that Crack willow is listed in the National Pest Plant Accord and is an Unwanted Organism, and Sections 52 and 53 of the Biosecurity Act apply. Crack willow is widespread nationally and the Panel accepts the staff recommendation that ORC staff consider that a regulatory approach in the Plan is not appropriate. ORC regularly undertakes control of crack willow along rivers in Otago to reduce flood effects.
P098.2	Blair Jeffrey Devlin	I would like to propose Buddleia is added to the list of pest plants. Buddleia is recognised by the Department of Conservation as one of the 'dirty dozen' weeds, and should also be recognised by ORC in its Proposed Pest management Plan and Biosecurity Strategy. Buddleia is spreading rapidly through the Queenstown lakes district and elsewhere. Major infestations are apparent on the Shotover Delta and at Tuckers Beach DOC reserve, and the pest plant is almost continuous along the State Highway from the Roaring Meg for many kilometres towards the Gibbston Valley. This pest plant grows very well in a variety of places, such as: rivers, streams, forests and bare land. It invades areas where there are native plants, threatening their survival. Buddleia can intensify flooding when it grows in and near rivers, changing water flow. A key concern is the dense woody nature of the plant makes public access to lakes and rivers more difficult, there are large areas of the Shotover Delta that are inaccessible due to dense impenetrable Buddleia.	Add buddleia as a pest plant to the Plan.	Additions to Plan	Reject	Buddleia is widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control buddleia rather than taking a regulatory approach. Buddleia is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance. It is noted that a biological control agent for buddleia has been released.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P107.1	Royden Thomson	Briar is a dominant weed in Central Otago and should be shifted from Appendix 1 to the pest plant category.	Add Briar as a pest plant to the Plan.	Additions to Plan	Reject	See response to submission P094.2.
P107.2	Royden Thomson	White tailed spiders are widespread, dangerous and exotic and should be added to Appendix 1.	Add White Tailed Spider to Appendix 1.	Additions to Plan	Reject	The Panel notes that ORC does not have any surveillance information on white tailed spiders in Otago and a regulatory approach is not recommended.
P107.3	Royden Thomson	Stonecrop is an expanding plant in parts of Central Otago and should be added to Appendix 1.	Include Stonecrop to Appendix 1.	Additions to Plan	Reject	Stonecrop is widespread in Central Otago. ORC does not have any surveillance information on stonecrop and the Panel considers that a regulatory approach in the Plan is not appropriate. The Panel considers it more appropriate to provide information and advice on methods to control stonecrop rather than taking a regulatory approach.
P119.1	Hamish Carswell	I recommend that the plant Horehound be added as a new pest. I farm in the Dunback area and have spent multiple seasons trying to control this invasive weed. I have an active farm management strategy relative to this weed. My fear is that because there are many classes of stock traded throughout both islands currently it will be hard to stop the spread of this weed. There are many burrs containing seed per plant and they readily attach to skin or wool. Many people do not know either what this weed is, or how aggressive it is. Ignore this weed at your peril, it already has a major hold in the Otago region and I believe needs a tangible management strategy for controlling it. The proposed biological control will help, but be advised there is still plenty of horehound in Australia, which is where the biological control has come from.	Add horehound as a pest to be managed in the Plan.	Additions to Plan	Reject	The Panel notes that horehound is widespread in Otago particularly in drier areas. ORC does not currently undertake surveillance of horehound in Otago. It is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel accept the staff recommendation that the ORC prepare guidance on the identification, effects and control methods for horehound on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear. An application to introduce two moths, <i>Wheeleria spilodactylus</i> and <i>Chamaesphecia mysiniformis</i> , as biological control agents for horehound was approved for release by the EPA in December 2018.
P122.2	Dawn Sangster	Geese would be one of our worst pests. Not only do they eat pasture but they foul the pasture and contaminate our waterways. Both our properties are situated on the Taieri river and we consider they have a detrimental effect on the Taieri river and water quality. They have an economic impact on our properties and other properties in the Maniototo. The problem is the size of the geese population which is growing due to them being extremely difficult to cull. We invest and contribute to community shoots and allow hunters on but the numbers are so huge that they need more of an integrated plan with ORC resource. We advocate strongly for their inclusion in the pest plan.	Canadian geese and feral white geese should be added to the pest plan.	Additions to Plan	Reject	The Panel notes that as a result of the removal of the Canada goose from Schedule 1 of the Wildlife Act 1953 in 2011, the species is no longer recognised as a game bird. Subsequently, control has become a landowner's responsibility. The Canada goose and white/domestic goose are currently included as Organisms of Interest in the Plan, and could be included as pest animals in the Plan in the future if necessary, although this would require a cost benefit analysis under section 6 of the National Policy Direction for Pest Management 2015 (the NPD) and consultation with affected persons. The inclusion of these species in the Plan would not remove the primary responsibility for pest control from the land occupier, although it would provide some form of surety that other land occupiers faced similar responsibilities for control of the species on their own properties. However, given the movement of geese between properties, the requirement for land occupiers to maintain to a certain level on individual properties may be difficult to enforce, rendering any such rule impractical. The Panel is of the view that including the Canada goose and white/domestic goose as OOs in the Plan is appropriate.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P123.1	Carolyn Dundass	In our valley we have a massive problem with Canadian Geese, and the huge numbers in paddocks, wetlands and the Taieri river will be contributing to fouling of the waterways. Huge numbers of geese are in our valley and they devastate our paddocks, grazing and fouling the grass. We as a community have paid for helicopter culls with 2500 birds being shot in a recent cull. To date for the 4 years we have culled 8500 geese. Yes, the geese are on our paddocks but also the Council needs to acknowledge that the geese's fouling also affects the waterways as they inhabit wetter areas and their excrement washes into the water during high river flows and flooding. The Canadian geese were introduced to NZ in 1905 and their spread is immense and now huge problem for farmers. The goose is a very wary bird and only the skilled, knowledgeable hunter has success in culling these birds. In 2011 these birds were taken off the game bird list and the responsibility to cull these birds falls with the occupier of the land. As rabbits were introduced into NZ in the 1830's for food and sport and now are declared a pest, the Canadian Goose should also be included on the list.	Canadian Geese should be included on the list as a pest.	Additions to Plan	Reject	See response to submission P122.2.
P143.1	Anna Clark	I support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. I suggest the addition of mice and rabbits/hares to this list as these also have environmental, economic and social consequences.	Support the list of organisms declared as pests in Table 2. Add mice, rabbits and hares to this list.	Additions to Plan	Reject in part	Rabbits are included as a pest species in the Plan. Hares have not been included as although they are in the Operative Plan, ORC have had very few complaints regarding hares in the last 10 years. Mice are identified as an Organism of Interest and the Panel notes that ORC staff provide advice to people regarding mouse control as required. As mice are widespread nationally, a regulatory approach is not considered appropriate.
P174.2	Helen Clarke	I would like to add three further pest plant species to the list. They are Tree Lupin ( <i>Lupinus arboreum</i> ), Buddlea ( <i>Buddleja davidii</i> ) and Silver birch ( <i>Betula pendula</i> ). All species are invasive and spreading in the dry stony ground in the Upper Clutha lakes district. Silver birch has allergy inducing properties which affect many people as well.	Add Tree Lupin ( <i>Lupinus arboreum</i> ), Buddlea ( <i>Buddleja davidii</i> ) and Silver birch ( <i>Betula pendula</i> ) to the list of pest plants.	Additions to Plan	Reject in part	Buddleia is widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control buddleia rather than taking a regulatory approach. The Panel also consider that a non-regulatory approach to silver birch and tree lupin, by providing information and advice on methods of control rather than taking a regulatory approach is appropriate. Tree lupin is recommended to be included to Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed.
P182.5	Federated Farmers of New Zealand	FFNZ recommends the inclusion of Yellow Bristle Grass as an exclusion pest. 13. Yellow Bristle Grass (YBG) is an aggressive annual-seeding plant which spreads rapidly through pasture, reducing pasture quality and causing production losses. It has low palatability which leads to rapid re-infestation and an opening for other weeds. The barbed seed is transported in dung, fur and feathers, as well as by water, in soil, and as contaminants of hay and maize. 14. YBG is problematic in the central North Island, and in the South Island it is found in Golden Bay, Upper Buller, at roadside sites through the Buller Gorge and in Canterbury. 15. YBG is included in the Tasman/Nelson RPMP as a sustained control pest, with the aim of reducing its distribution to protect the dairy industry. It is also in the West Coast RPMP as a progressive containment pest and in Canterbury's as an eradication pest.	Add Yellow Bristle Grass to the Plan.	Additions to Plan	Reject in part	The Panel notes that ORC staff would need to undertake research and surveillance to assess whether yellow bristle grass presents an economic and environmental risk in Otago, and to determine its extent in Otago if it is present. It is recommended that yellow bristle grass be classified as an Organism of Interest so ORC can establish a research and surveillance programme in order to determine whether future regulatory control may be needed.
P184.1	Lynne Stewart	Otago Regional Council, ORC, must list and control the worst of our Exotic pests before our Unique Indigenous Biodiversity is totally diminished, then lost forever. ORC's Pest Strategy must work in Tandem with ORC's Biodiversity Strategy with the vision: "Otago is the proud home of thriving ecosystems and rich biodiversity."	No specific relief sought.	Additions to Plan	Reject	No specific relief requested.



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P184.2	Lynne Stewart	ORC must list the following organisms as Pests -Mustelids: Ferrets, Stoats & Weasels. All Mustelids kill huge numbers of birds and Lizards so have significant negative impact on our Native Bird & Lizard Population numbers, therefore diminishing our Unique Indigenous Biodiversity so must be included as a pest animal. - Feral Cats. Feral cats kill and eat our native birds and lizards so have significant negative impact on our Native Bird & Lizard Population numbers, diminishing our Unique Indigenous Biodiversity so are a pest animal. -Possums. Possums Kill & Eat bird eggs as well as huge amounts of our native plants so have significant negative impact on our Native Bird Population numbers, diminishing our Unique Indigenous Biodiversity so must be included as a pest animal. -Hedgehogs. Hedgehogs Kill & Eat many birds eggs and insects. Insects provide food to geckos and skinks so Hedgehogs have significant negative impact on our Native Bird and Lizard Population numbers, diminishing our Unique Indigenous Biodiversity so are a pest animal. -Northern Hemisphere Wasps. Wasps Compete ferociously with birds and bees as they devour nectar from flowers and honey dew from beech trees so have significant negative impact on our Native Bird & bee Population numbers, diminishing our Unique Indigenous Biodiversity so are a pest animal. -Magpies. Magpies Compete ferociously with native birds for territory / habitat and with their gangs of up to 9 vicious attacking magpies, keep native Tui and Korimako well away, so have significant negative impact on our Native Bird Population numbers, diminishing Unique Indigenous Biodiversity so are a pest animal.	Add mustelids, feral cats, possums, hedgehogs, Northern Hemisphere wasps and magpies as pest animals in the Plan.	Additions to Plan	Reject	These species are widespread nationally and the Panel considers it more appropriate to provide information and advice on methods to control them rather than taking a region-wide regulatory approach. However the Panel note that mustelids, feral cats, possums and hedgehogs are included within the site led programmes, and additional site led programmes which seek to control these species could be added to the Plan in the future where the criteria in Appendix 2 of the Strategy is met.
P198.1	Gerry Essenberg	Briar and Blackberry are organisms which readily spread if left unchecked and colonise across boundaries.	Add briar and blackberry as pest plants in the Plan.	Additions to Plan	Reject	See response to submission P094.2 regarding briar. Blackberry is widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control rather than taking a regulatory approach.
P201.3	Dunedin City Council	The DCC recommends the proposed RPMP include all pest organisms identified in the current regional pest management plans for the three regions adjacent to Otago: Canterbury, West Coast and Southland. DCC comments on organisms that should be added to the proposed RPMP (including cotoneaster, Himalayan tahr and others) are below. The DCC submits the inclusion of these organisms is necessary for an Otago RPMP to achieve consistency, and – more importantly – to achieve good pest management and biosecurity outcomes for the Otago region.	The Plan include all pest organisms identified in the current regional pest management plans for Canterbury, West Coast and Southland.	Additions to Plan	Reject	The Panel does not consider it appropriate to include the pests species in all adjacent councils' Pest Management Plans. If all regional councils adopted this approach then there would be no regional variances to pest management to address the different biosecurity issues in each region. Although the National Policy Direction 2015 requires consistency between regions, this is to ensure that management approaches across boundaries are coordinated, and not to ensure that all plans are identical.
P201.7	Dunedin City Council	The DCC recommends the addition of Japanese knotweed ( <i>Fallopia japonica</i> ) to the list of pest plant species in Table 2 (at 4.1, pages 19-20). At present, Japanese knotweed exists in low densities in the Dunedin Town Belt and urban area. Without management this pest plant could affect infrastructure and result in significant financial costs to Dunedin City and private landholders. This has been the case in the United Kingdom and other Northern Hemisphere countries. The DCC recommends the RPMP assign 'Exclusion' as the Primary Programme to manage Japanese knotweed. Appendix 1 of the proposed Biosecurity Strategy should be amended to reflect this change to the RPMP.	Add Japanese knotweed ( <i>Fallopia japonica</i> ) as a pest plant for Exclusion.	Additions to Plan	Reject in part	Japanese knotweed is listed in the National Pest Plant Accord and is an Unwanted Organism, and Sections 52 and 53 of the Biosecurity Act apply. ORC does not currently undertake surveillance of Japanese knotweed but staff are aware of its presence in particular locations in Dunedin, but have no knowledge of infestations outside the city. An exclusion programme is not appropriate for Japanese knotweed as it is already present in Otago. The Panel consider it more appropriate to provide information and advice on methods to control rather than taking a regulatory approach. This does not prevent DCC from undertaking control within the town belt. ORC would need to undertake research and surveillance to assess its risks and impacts in Otago, and to determine its extent in Otago to be able to determine if any future programme in the Plan is necessary. The Panel accepts the staff recommendation that Japanese knotweed be classified as an Organism of Interest so ORC can establish a research and surveillance programme in order to determine whether future regulatory control may be needed.

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P201.9	Dunedin City Council	The DCC understands small populations of Himalayan tahr have established on or near the Dunedin City boundary, for example in Danseys Pass and the Rock and Pillar Range. The impact of Himalayan tahr on subalpine and alpine ecosystems is severe when their numbers build up. The cost of controlling and removing Himalayan tahr is expensive (it requires helicopters) and very resource intensive. The DCC recommends the proposed RPMP include provisions to deal with Himalayan tahr as soon as they arrive in Otago or, preferably, exclude them altogether. The DCC recommends the addition of Himalayan tahr ( <i>Hemitragus jemlahicus</i> ) to the list of pest animal species in Table 2 (at 4.1, pages 20-21). The DCC recommends the RPMP assign 'Exclusion' as the Primary Programme to manage Himalayan tahr. Appendix 1 of the proposed Biosecurity Strategy should be amended to reflect this change to the RPMP. The 1993 Himalayan Tahr Control Plan previously adopted by DOC and hunter groups aimed to keep tahr north of Haast Pass. Based on current knowledge of Himalayan tahr distribution and DOC control operations the DCC believes the suggested boundary in Attachment A remains realistic.	Add Himalayan Tahr to the Plan as an exclusion species.	Additions to Plan	Reject	Himalayan tahr are managed by the Wild Animal Control Act 1977, which is administered by the Department of Conservation.
P210.2	Guardians of Lake Hawea	We further request that the Tree Lupin/ <i>Lupinus arboreus</i> be added to the list of pest organisms. This plant is far more widespread in our area than Russell Lupin and is equally invasive. Its rapid spread around Lake Hawea in recent years has been exacerbated by low lake levels, but the infestation of this plant is so prevalent that even raising the lake to its highest consented level will only slightly reduce its extent. We consider that it is as worthy of pest status as the Russell Lupin. We would like it subjected to a "sustained control" policy.	Add tree lupin in the Plan as a sustained control species.	Additions to Plan	Reject in part	Tree lupin is recommended to be included as an Organism of Interest in Appendix 1 of the Plan so surveillance can be undertaken to determine whether any regulatory control in the future may be needed.
P212.1	Te Kakano Aotearoa Trust	We support all the pest plant species listed in the document but recognise that many listed do not grow in our dry climate. We would like to add further pest plant species to the list. They are Buddleia ( <i>Buddleja davidii</i> ), Silver birch ( <i>Betula pendula</i> ), Brier rose ( <i>Rosa rubiginosa</i> ) Hawthorne ( <i>Crataegus monogyna</i> ) and Elderberry ( <i>Sambucus nigra</i> ). All species are invasive and spreading in the dry stony ground in the Upper Clutha lakes district. Silver birch has allergy inducing properties which affect many people as well.	Add Buddleia, silver birch, briar rose, hawthorn, and elderberry to the Plan.	Additions to Plan	Reject	Buddleia, silver birch and elderberry are widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control these species rather than taking a regulatory approach. The Panel notes that staff do not have details of the distribution or extent of briar and hawthorn and do not currently undertake surveillance, but are aware of their presence and impacts in Otago. Briar and hawthorn are listed in the Plan as Organisms of Interest and will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel accepts the staff recommendation that ORC staff prepare guidance on the identification, effects and control methods for briar and hawthorn on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P229.2	Sheila Chappell	Other organisms declared as pests in section 4.1 (Feral Cat, Feral Deer, Feral Pigs, Hedgehogs, Ferrets, Stoats, Weasels, Possums, Rats) should be included as pest animals	Include these non-native animals as pest animals and cull where necessary	Additions to Plan	Reject	Feral cat, feral deer, feral pigs, hedgehogs, ferrets, stoats, weasels, possums and rats are already site-led pests in the Plan. ORC intends to work collaboratively with communities in the Dunedin site-led areas regarding the management of these pests.
P243.2	Te Nohoaka o Tukiauau/Sinclair Wetlands Trust	Several species identified as pests at Te Nohoaka are not listed as pests in the Plan. In some cases this is because they are listed as Organisms of Interest. The Trust recommends that the following amendments be made: That crack willow and grey willow be reclassified from Organisms of Interest to pests, That hares be added as an Organism of Interest.	Add crack willow, grey willow and hares to the Plan.	Additions to Plan	Reject	Crack willow and grey willow are listed in the National Pest Plan Accord and are Unwanted Organisms, and Sections 52 and 53 of the Biosecurity Act apply. Crack willow is widespread nationally and the Panel consider that a regulatory approach in the Plan is not appropriate. ORC regularly undertakes control of crack willow along rivers in Otago to reduce flood effects. See response to submission P143.1 regarding hares.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P258.10	Forest and Bird	Section 6.3 Progressive Containment Pests. Forest and Bird supports the listed programs and seeks the addition of Veldt grass <i>Ehrharta erecta</i> . Currently this plant is restricted to Dunedin City gardens and roadsides. Recently arrived here. Well known as a dense and persistent weed of northern NZ gardens, roadsides and in open indigenous forests. Veldt grass has the potential to invade sand dunes, cliffs, regenerating forest, riparian areas and gardens. It can be controlled. It is easily pulled but drops seeds that germinate in disturbed soil so all seed heads need to be destroyed. Glyphosate (e.g. Roundup) for large areas.	Add veldt grass as a progressive containment species in the Plan.	Additions to Plan	Accept in part	Veldt grass is not listed in the National Pest Plant Accord or as an Unwanted Organism and ORC does not hold any surveillance information on Veldt grass to be able to assess whether a progressive containment programme is appropriate. The Panel heard from the submitter at the Hearing and received further information regarding the presence and effects of veldt grass and accepts the staff recommendation to include veldt grass in the Plan as an Organism of Interest to be watch listed for ongoing surveillance or future control opportunities.
P258.13	Forest and Bird	Section 6.4 Sustained Control Programs: Forest and Bird supports all these species being listed for sustained control and the associated rules. Forest and Bird is aware that there are a number of other species that we consider should be added to this program as listed below. Forest and Bird seeks the addition of the following species: Hawthorn –This is spreading in the Queenstown/Shotover area as well as in the Macraes district. Wildings need to be dealt with now under sustained control and notice given in the Biodiversity strategy that hedges will need to be progressively removed. Darwin's barberry – in line with ECAN Pest Management Strategy. As ECAN's Plan states: It is capable of threatening the purity of indigenous forest by invading intact and undisturbed stands. Older plants can flower and produce seeds in the shade and so perpetrate the production of fresh seed. In Otago it can become a monoculture. We note that Greater Wellington Regional Council has released bio control weevils at two sites in Wellington. Forest and Bird urges the ORC to take a more strongly proactive stance for Darwin's barberry.	Support for sustained control programmes, with the addition of Hawthorn and Darwin's barberry as pests for sustained control.	Additions to Plan	Reject in part	Support for the sustained control of pests is noted. The Panel notes that staff do not have details of the regional distribution or extent of hawthorn and Darwin's barberry and do not currently undertake surveillance of Hawthorn and Darwin's barberry in Otago, but are aware of the presence and impacts of both species. Darwin's barberry is a site-led pest in the Mt Cargill-West Harbour and Otago Peninsula site-led programmes. Hawthorn is recommended to be included in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. The Panel accepts the staff recommendation that ORC prepare guidance on the identification, effects and control methods for hawthorn on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P258.16	Forest and Bird	Feral deer, pigs and goats are serious pests where ever they occur in indigenous ecosystems and Forest and Bird considers ORC need to be much more proactive, in a manner similar to the Auckland Regional Council. We consider feral goat's deer and pigs need to be listed as regional not site lead pests so that there are rules prohibiting the release from containment of any goat, pig or deer into any part of Otago and that any person farming goats and deer must meet minimum fencing requirements. The proposed Auckland RPMP contains a definition of the fencing requirements for goats.	We consider feral goats deer and pigs need to be listed as regional not site lead pests.	Additions to Plan	Reject	These species are managed pursuant the Wild Animal Control Act 1977, which is administered by the Department of Conservation and additional rules regarding fencing and/or other containment are not recommended.
P258.18	Forest and Bird	Similarly for feral cats and feral dogs – Forest and Bird seeks rules that provide that no person shall abandon, or cause to be abandoned any dog or cat with the Otago region.	Rules restricting the abandonment of dogs or cats are added to the Plan.	Additions to Plan	Reject	The Panel accepts the staff recommendation not to include rules regarding the abandonment of dogs and cats, as rules would be difficult to enforce and dogs and cats (excluding feral cats as defined in the Plan) are companion animals.
P258.23	Forest and Bird	Mat grass ( <i>Nardus stricta</i> ). Widespread mat-forming grass in upland areas. Displaces native tussocks. North, South and Chatham Islands. Present in Dunedin, north Otago & Mackenzie. Wild Agapanthus – nuisance weed in NI gardens and roadsides. It is less invasive in Otago in the current climate, but it is naturalising on Otago Peninsula road sides. Tree lupin ( <i>Lupinus arboreus</i> ): Lowers light levels in open habitats, causing subsequent invasion by weedy shrubs, vines, wilding pines, etc. Increased soil nitrogen may induce changes in the species making up the plant communities from low fertility species to exotic grass or other weed species. Causes sand and gravel to build up, altering the shape of coastlines or rivers and causing erosion elsewhere. Increased cover prevents some birds (e.g. dotterels, wrybills) nesting and increases predation of birds that do by cats and mustelids. It is listed in the proposed ECAN RPMP. Scattered throughout Otago –riverbeds and coastal sand dunes.	Add mat grass, wild agapanthus, and tree lupin to the Plan as Organisms of Interest.	Additions to Plan	Accept in part	Tree lupin is recommended to be included to Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed. Mat grass is not listed in the National Pest Plant Accord or as an Unwanted Organism and ORC is not aware of surveillance or control programmes being undertaken by other regional councils. Agapanthus is widespread nationally and is not recommended to be added as an Organism of Interest. The Panel notes that ORC staff can provide advice to people on agapanthus control as needed.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P258.3	Forest and Bird	New Zealanders have got behind the ambitious Predator free 2050 goal and it is pleasing to see that ORC envisage that this proposed Regional Pest Management Plan (RPMP) seeks to support this national goal. Forest and Bird would like to see the proposed plan do more to anticipate and address future pest management issues by ensuring that all potential pests that are on Otago's borders are in the exclusion programs or included in the organisms of interest list and that significantly threatening organisms such as myrtle rust are also added to the exclusion program.	Potential pests on Otago's borders are added to exclusion programmes in the Plan. Myrtle rust is added as an exclusion pest.	Additions to Plan	Reject in part	Myrtle rust is currently being managed under a national incursion response, led by the Ministry for Primary Industries (MPI) and is an Unwanted Organism. ORC would work in an incursion response capacity, alongside MPI, should any incidence of Myrtle rust be identified. With regards to the pests that are on Otago's borders and anticipating future pest management issues, the Hearing Panel recommends that egeria and hornwort are included as exclusion species.
P258.6	Forest and Bird	Section 4 .1 Organisms declared as pests. Forest and Bird supports the list of organisms declared as pests and notes that we have long sort the inclusion of many of the additions, which have over the intervening years become magnified. Forest and Bird seeks the following additions: Purple loosestrife – Exclusion; Gold Fish – Eradication	Add purple loosestrife and a exclusion pest and goldfish as a eradication pest in the Plan.	Additions to Plan	Reject in part	The Panel notes that ORC staff are aware that purple loosestrife may be present in Oamaru where it has been controlled voluntarily by ORC in the past. Therefore an exclusion programme is not appropriate. However, it is recommended to be included in Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed. ORC does not have any surveillance information on goldfish in Otago and a regulatory approach is not recommended. The spread of goldfish is most appropriately managed under the Conservation Act 1987 and Freshwater Fisheries Regulations 1983. It is recommended that goldfish be included in Appendix 1 of the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed. The Panel also recommend including goldfish to the list of species that ORC will prepare new guidance on within the new on-line 'pest hub' in Section 4.2 Priority Projects of the Strategy, and can work with DOC and Queenstown Lakes District Council (QLDC) on the preparation and distribution of educational material regarding goldfish in Otago. Staff can also support any ongoing coordinated approach to the management of goldfish at the Albert Town stormwater detention ponds where support from the other parties involved is needed.
P258.8	Forest and Bird	Section 6.1 Exclusion Program Pests. Forest and Bird supports the proposed list and seeks the addition of Purple loosestrife. And Myrtle Rust. Myrtle Rust is not yet in Canterbury however it is in Marlborough which indicates it is capable of spreading or being spread quite fast	Add Myrtle Rust and Purple loosestrife as exclusion pests in the Plan.	Additions to Plan	Reject in part	See response to submission P258.3 regarding myrtle rust and submission P258.6 regarding purple loosestrife.
P258.9	Forest and Bird	Section 6.1.3 Eradication programs. Gold fish dumped into Albert Town's artificial wetlands are breeding and some have been found into a natural lagoon beside the Clutha River. There is a concern that these could naturalise and spread further. It would make good sense to include Wild goldfish as a pest organism and have an eradication program. It may not be feasible to require land occupiers to destroy all gold fish, thus it would be prudent for the Otago regional Council to carry out this eradication (if not already achieved) in collaboration with the Department of Conservation. Forest and Bird is disappointed our recommendation of including heath rush has not been included for eradication as its infestation levels are low enough to make eradication possible. It can be controlled mechanically or with herbicides depending on the situation. Juncus squarrosus – heath rush - currently this is not common in Otago but it is present on Flagstaff and Mt Cargill, it is also nearby in the Mackenzie Basin bogs and at Glenary Station, and Boreland Road in Southland, This is potentially a threat to Lammerlaw and Lammermoor Ranges and potentially also other upland wetland areas.	Add wild goldfish and heath rush as eradication pests in the Plan.	Additions to Plan	Reject	See response to submission P258.6 regarding goldfish. Heath rush is not listed in the National Pest Plant Accord or as an Unwanted Organism and ORC is not aware of surveillance or control programmes being undertaken by other regional councils. The Panel heard from the submitter at the Hearing and received further information regarding the presence and effects of heath rush and accepts the staff recommendation to include heath rush in the Plan as an Organism of Interest to be watch listed for ongoing surveillance or future control opportunities.
P260.1	Bronwyn Judge	I am concerned about the spread of the noxious weed hemlock, and I feel it should be included in the list of pest plants.	Add Hemlock as a pest plant in the Plan.	Additions to Plan	Reject	See response to submission P008.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P264.2	Papatowai & District Community Association	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.	English ivy, Japanese honeysuckle, woolly nightshade, wandering willie, buddleia, wild ginger, Darwin's barberry, climbing asparagus and banana passionfruit are added as regional pests within the Plan.	Additions to Plan	Reject	English ivy, Japanese honeysuckle, buddleia, wild ginger and climbing asparagus are widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control these species rather than taking a regulatory approach. Further site-led programmes to control Darwin's barberry and banana passionfruit may be established in the future where these are developed in accordance with Appendix 2 of the Strategy.
P266.11	Lindis Pass Conservation Group Inc	6.4.x. Tree Lupin, Lupinus arborea: Tree Lupin has not been included in the Plan. It is present in dry gravel watercourses within Lindis Pass Scenic Reserve, on the Otago side, and downstream into the whole Clutha River system. On river margins and in gravel it crowds out other plants except long grass and scrambling weeds, creating useless land and fire risk. It is not presently a problem in Canterbury, so eliminating it from the Lindis valley is of considerable importance.	ORC to include Tree Lupin in the Plan as a pest plant for Progressive Containment, with the intended outcome of eventually removing it altogether from headwaters, and containing it downstream, in order to eliminate it from the landscape.	Additions to Plan	Reject in part	See response to submission P174.2. Tree lupin is recommended to be included in Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed.
P266.19	Lindis Pass Conservation Group Inc	Not covered in Plan: Vipers Bugloss: While it can be a significant food source for bees, this long-flowering plant has potential to become a pest on dry slopes in the high country where grazing has been removed. It can do this by smothering and replacing valued native herbs.	ORC to keep a watching brief on the spread of Vipers Bugloss and to target it specifically should it become as much of a pest in natural ecosystems as brier has.	Additions to Plan	Reject	Vipers bugloss is widespread in central Otago and the Panel considers that a regulatory approach is not appropriate. It is more appropriate to provide information and advice on methods to control this species rather than taking a regulatory approach.
P267.2	Arrowtown Village Association	We support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. We suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Add rowan, hawthorn, and boxthorn as pest plants in the Plan.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of hawthorn, rowan and boxthorn and do not currently undertake surveillance of these species in Otago, but are aware of their presence and impacts. See response to submission P002.1 regarding hawthorn. Rowan and boxthorn is also listed in the Plan as Organisms of Interest and will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. Additionally, the Panel accepts the staff recommendation that staff prepare guidance on the identification, effects and control methods for these species on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P268.2	Fiona Rowley	I support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. I suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Add rowan, hawthorn, and boxthorn as pest plants in the Plan.	Additions to Plan	Reject	See response to submission P267.2.
P278.1	Styx Incorporated and Rocklands Station	Your policy statement is to control pests especially where they adversely affect lakes, rivers and wetland. Canadian geese are now being considered as a pest as they are fouling pastures and damaging crops year on year. They are also affecting waterways as they inhabit wetter areas and their excrement washes into the waterways during high river flows and flooding. As a community we have paid for helicopter culls however we feel it needs to be put on the Pest Management Plan as more and more are continuing to show up and it's becoming out of control.	Add Canadian geese to the Plan.	Additions to Plan	Reject	See response to submission P122.2.
P282.2	Duncan Keenan	I support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. I suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. Add rowan, hawthorn, and boxthorn as pest plants in the Plan.	Additions to Plan	Reject	Support for the list of plants declared as pests is acknowledged. See response to submission P267.2.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P283.2	Wakatipu Reforestation Trust	We support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. We suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. Add rowan, hawthorn, and boxthorn as pest plants in the Plan.	Additions to Plan	Reject	Support for the list of plants declared as pests is acknowledged. See response to submission P267.2.
P289.5	Director General of Conservation	I recommend the inclusion of Japanese Knot Weed in the RPMP as a species targeted for progressive containment. This is one the world's worst weed species and there are challenges in controlling it. Targeted research and an efficient management approach is required to contain its spread.	Include Japanese Knotweed as pest plant to be managed by progressive containment	Additions to Plan	Reject in part	See response to submission P201.7.
P292.1	Lillian Ward	The current plan makes no mention of Japanese Knotweed. This highly invasive plant species is present in at least Dunedin city and is a great risk to buildings and proper values as well as the natural environment. It's presence should be addressed and combatted through the plan. I emailed the ORC about it's presence and was informed nothing could be done because it is not in current operational policy. The officer also failed to inform me of this consultation which I regard as a gross oversight and is the reason this submission is so brief. Japanese knotweed is one of the most serious invasive species in the UK and a cursory examination of their government's materials should provide all the relevant information.	Include Japanese Knotweed as pest plant in the Plan.	Additions to Plan	Reject in part	See response to submission P201.7.
P293.11	Otago Peninsula Biodiversity Group	OPBG believe chinchillas should be included either as a listed pest or an organism of interest to ensure that they remain excluded from the region.	Add chinchillas to the Plan.	Additions to Plan	Reject	The Panel notes that ORC staff have consulted with DOC on the risks regarding chinchillas in Otago and do not consider they are likely to pose a significant risk in Otago. Environment Southland staff have also confirmed that they consider the risk in Southland to be low.
P293.12	Otago Peninsula Biodiversity Group	OPBG believe Japanese knotweed should be included either as a listed pest or an organism of interest.	Add Japanese knotweed to the Plan.	Additions to Plan	Accept	See response to submission P201.7.
P294.1	Save The Otago Peninsula	6.3.1 STOP supports the list of plant pests to be included in progressive containment programmes. In addition, Bomarea and Cape Ivy are of particular concern on the Otago Peninsula. Many residents are familiar with Bomarea, but not Cape Ivy. German Ivy is more widespread on the Peninsula.	Addition of Bomarea and Cape Ivy to the list of pest plants included for progressive containment.	Additions to Plan	Accept	Both species are listed in the Plan as progressive containment species.
P294.13	Save The Otago Peninsula	Appendix 1 Organisms of Interest in Otago: Add Cape honey flower <i>Melianthus major</i> , German Ivy <i>Senecio mikanioides</i> . Correct the spelling of hawthorn and <i>Juncus gerardii</i> .	Amend Appendix 1 Organisms of interest as follows: Add Cape honey flower <i>Melianthus major</i> , German Ivy <i>Senecio mikanioides</i> . Correct the spelling of hawthorn and <i>Juncus gerardii</i> .	Additions to Plan	Accept in part	The minor spelling amendments are recommended to be accepted. German ivy is widespread and the Panel consider it more appropriate to provide information and advice on methods to control German ivy rather than taking a regulatory approach. The Panel notes that ORC staff are not aware that Cape honey flower is naturalised in Otago and consider providing information and advice where needed, rather than a regulatory approach, is appropriate.
P298.11	Predator Free Dunedin	PFD believe chinchillas should be included either as a listed pest or an organism of interest to ensure that they remain excluded from the region.	Chinchillas are added as either a pest animal or an organism of interest.	Additions to Plan	Reject	See response to submission P293.11.
P298.12	Predator Free Dunedin	PFD believe Japanese knotweed should be included either as a listed pest or an organism of interest.	Japanese knotweed is added as either a pest plant or an organism of interest.	Additions to Plan	Accept	See response to submission P201.7.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P300.4	Ruth-Ann Anderson	Another species to include is Spanish Heath, <i>Erica lusitanica</i> . This invasive plant is found in localised area of forestry, farm and public land throughout Otago. It rapidly forms dense stands and has fine windborne seed capable of spreading wide distances. Spanish Heath is of low palatability to stock. It should be included for economic and environmental reasons and subject to Progressive Containment with a Good Neighbour clause.	Progressive containment of Spanish heath with a good neighbour clause.	Additions to Plan	Reject in part	Spanish heath is not listed in the National Pest Plant Accord or as an Unwanted Organism. The Panel notes that ORC staff do not have details of distribution or extent of Spanish heath and do not currently undertake surveillance of it in Otago. The Panel is aware that a site-led programme is proposed in Southland for Spanish heath. Spanish heath is recommended to be included to Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed.
P310.3	Yellow-eyed Penguin Trust	We note that Japanese knotweed ( <i>Fallopia japonica</i> ) - 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 ( <i>Lamium galeobdolon</i> ) 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 <i>Tradescantia</i> .	Add Japanese knotweed and aluminium plant as pest species for eradication in the Plan.	Additions to Plan	Reject in part	See response to submission P201.7 regarding Japanese knotweed. Aluminium plant is widespread and the Panel considers that a regulatory response in the Plan is not appropriate.
P310.4	Yellow-eyed Penguin Trust	The trust believes that boxthorn ( <i>Lycium ferocissimum</i> ) should be classified as a pest plant. 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.	Add boxthorn a pest plant to the Plan.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of boxthorn and do not currently undertake surveillance of this species in Otago. Boxthorn is also listed in the Plan as an Organism of Interest and will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. Additionally, the Panel accepts the staff recommendation that ORC prepare guidance on the identification, effects and control methods for this species on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P312.1	Land Information New Zealand	Section 4.1 Organisms declared as pests and Table 2: LINZ submits that the following species should be added to Table 2: • <i>Egeria</i> ( <i>Egeria densa</i> ) • Hornwort ( <i>Ceratophyllum demersum</i> ). The primary programme for <i>egeria</i> ( <i>Egeria densa</i> ) and hornwort ( <i>Ceratophyllum demersum</i> ) should be exclusion from the Otago region.	Retain the list of organisms classified as 'pests' in Section 4.1: Table 2. 2. Add the following species to Table 2: • <i>Egeria</i> ( <i>Egeria densa</i> ) • Hornwort ( <i>Ceratophyllum demersum</i> ). 3. The primary programme for <i>egeria</i> ( <i>Egeria densa</i> ) and hornwort ( <i>Ceratophyllum demersum</i> ) should be exclusion from the Otago region.	Additions to Plan	Accept	See submission P331.1 regarding <i>egeria densa</i> and hornwort.
P312.26	Land Information New Zealand	Appendix 1 Organisms of Interest: 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. LINZ considers that <i>egeria</i> ( <i>Egeria densa</i> ) should be classified as an exclusion pest and be subject to controls in the Plan. Accordingly, LINZ considers that <i>egeria</i> ( <i>Egeria densa</i> ) should be removed from the list of 'organisms of interest'.	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> ). 2. Remove <i>egeria</i> ( <i>Egeria densa</i> ) from Appendix 1 and classify as a pest species.	Additions to Plan	Accept in part	See submission P331.1 regarding <i>egeria densa</i> . The Panel also consider that a non-regulatory approach to silver birch and white poplar is appropriate, by providing information and advice on methods of control rather than taking a regulatory approach.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P312.4	Land Information New Zealand	Section 4.3 Other organisms that may be controlled, and Appendix 1 – organisms of interest: 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. 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'.	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> ). 2. Remove egeria ( <i>Egeria densa</i> ) from Appendix 1 and classify as a pest species.	Additions to Plan	Accept in part	See submission P331.1 regarding egeria densa. The Panel also consider that a non-regulatory approach to silver birch and white poplar is appropriate, by providing information and advice on methods of control rather than taking a regulatory approach.
P312.5	Land Information New Zealand	Section 6.1 Pests to be managed under exclusion programmes: 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. LINZ considers that egeria ( <i>Egeria densa</i> ) and hornwort ( <i>Ceratophyllum demersum</i> ) should be precluded from establishing in the region.	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. 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. 3. Add egeria ( <i>Egeria densa</i> ) and hornwort ( <i>Ceratophyllum demersum</i> ) to Plan Objective 6.1.3.	Additions to Plan	Accept	See submission P331.1 regarding egeria densa and hornwort.
P313.2	Carrie Pritchard	I support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. I suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Add rowan, hawthorn, and boxthorn as pest plants to the Plan.	Additions to Plan	Reject in part	See response to submission P267.2.
P315.2	Andrew Davis	I support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. I suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Add rowan, hawthorn, and boxthorn as pest plants to the Plan.	Additions to Plan	Reject in part	See response to submission P267.2.
P318.2	Ben Teele	I support the list of plants declared as pests including Contorta pine, Corsican pine, Darwin's barberry, lagarosiphon, larch, Mountain pine, Scots pine, sycamore, wilding conifers wild Russell lupin. I suggest that council adds rowan ( <i>Sorbus aucuparia</i> ), hawthorn ( <i>Crataegus monogyna</i> ), and boxthorn ( <i>Lycium ferocissimum</i> ) to the list of declared pests. These are invasive species and are spreading.	Add rowan, hawthorn, and boxthorn as pest plants to the Plan.	Additions to Plan	Reject in part	See response to submission P267.2.
P320.1	Bruce Jefferies	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. Hares need to be included	Support the list of organisms declared as pests in Table 2. Include hares.	Additions to Plan	Reject in part	Support for the list of organisms declared as pests is acknowledged. Hares are in the Operative Plan. However, ORC have had very few complaints regarding hares in the last 10 years, and can provide advice to landowners as required without the need to regulate.
P321.1	Papatowai Barberry Busters	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 grown 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.	We recommend that the list of pest plants include at least all of DOC's dirty dozen.	Additions to Plan	Reject	See response to submission P264.2.
P324.5	Aspiring Biodiversity Trust	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.	Include Southern black-backed gull for control in area of concern.	Additions to Plan	Reject	The southern black-backed gull is a native species and the Panel does not consider that it is appropriate to list the southern black billed gull in the Plan. Any intervention for control would have to be by the Department of Conservation.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P329.2	Maniototo Pest Management Incorporated	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.	White Geese and Canada Geese are added to the Pest Plan.	Additions to Plan	Reject	See response to submission P122.2.
P331.1	The Lake Dunstan Aquatic Weed Management Group	Section 4.1 Organisms declared as pests and Table 2: The LDAWMG submits that the following species should be added to Table 2: • Egeria (Egeria densa) • Hornwort (Ceratophyllum demersum). The primary programme for egeria (Egeria densa) and hornwort (Ceratophyllum demersum) should be exclusion from the Otago region.	1. Retain the list of organisms classified as 'pests' in Section 4.1: Table 2. 2. Add the following species to Table 2: • Egeria (Egeria densa) • Hornwort (Ceratophyllum demersum). 3. The primary programme for egeria (Egeria densa) and hornwort (Ceratophyllum demersum) should be exclusion from the Otago region.	Additions to Plan	Accept	Egeria densa and hornwort are not known to be present in Otago. We sought further information from staff in Minute 3 on the nature and occurrence of pathway spread of these freshwater species by boat users between regions and risk of transfer into Otago. Following the completion of the hearing, having heard the parties and considered evidence presented to us, we considered there was a compelling case for the inclusion of these species as exclusion pests and directed in Minute 6 that further work be undertaken on cost benefit analysis for provisions relating to egeria and hornwort and requested that staff provide an opportunity for submitters to provide their written views on the proposed provisions in a subsequent Minute 7. Having considered the staff response to Minute 6, the cost benefit analysis, and the outcomes of consultation, we accept that the management costs are anticipated as low, and on this basis accept the staff recommendation that benefits of the proposed exclusion programme for these species outweigh the costs.
P331.4	The Lake Dunstan Aquatic Weed Management Group	Appendix 1 Organisms of Interest: The LDAWMG considers that egeria (Egeria densa) should be classified as an exclusion pest and be subject to controls in the Plan. Accordingly, the LDAWMG considers that egeria (Egeria densa) should be removed from the list of 'organisms of interest'.	Remove egeria (Egeria densa) from Appendix 1 and classify as a pest species.	Additions to Plan	Accept	See response to submission P331.1
P335.11	Barrie Wills	Abutilon theophrasti (velvet leaf) should be listed in Table 4.	Add Abutilon theophrasti as a pest to be included in the exclusion programmes.	Additions to plan	Reject	See response to P335.51.
P335.12	Barrie Wills	Consider reference to similar species in Table 5, e.g. Austrostipa nodosa (needle grass), also Horedum spp (barley grass). Although more relevant to containment, they are widespread on many lower terraces and along roadsides in Otago, can have similar adverse effects. I have photos.	Consider reference to similar species in Table 5	Additions to plan	Reject	These species are not declared as pests in the Plan and no amendment to Table 11 is recommended. The Panel considers it more appropriate to provide information and advice on methods to control where needed rather than taking a regulatory approach.
P335.19	Barrie Wills	In relation to [Table 10] Contoneaster coriaceus & C. glaucophyllus should be considered here, along with Euonymus europaeus (spindle tree), latter being spread by birds, as with some Sorbus (rowan) spp, also Austrostipa nodosa (needle grass).	Consider Contoneaster coriaceus, C. glaucophyllus, Euonymus europaeus (spindle tree), Sorbus (rowan) and Austrostipa nodosa (needle grass) as pests for progressive containment.	Additions to plan	Reject	See submission P267.2 regarding rowan. Spindle tree and cotoneaster is not listed in the National Pest Plant Accord or as an Unwanted Organism and the Panel consider it more appropriate to provide information and advice on methods to control this rather than taking a regulatory approach. Chilean needle grass is declared as a pest in the Plan. However Austrostipa nodosa is not and the provision of information and advice on methods to control if needed rather than taking a regulatory approach is recommended.
P335.20	Barrie Wills	In relation to [Table 11 - Old mans beard] consider reference to similar species e.g. Clematis tangutica (Chinese clematis) which is becoming widespread in parts of Central Otago.	Include reference to Clematis tangutica (Chinese clematis) under Old mans beard, Table 11.	Additions to plan	Reject	Chinese clematis is not declared as a pest in the Plan and no amendment to Table 11 is recommended. The Panel consider it more appropriate to provide information and advice on methods to control where needed rather than taking a regulatory approach.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P335.30	Barrie Wills	In relation to [Table 18 - Nodding Thistle] Consider reference to similar species: <i>Carduus tenuiflorus</i> (winged thistle), <i>Onopurdum acanthium</i> (cotton thistle).	Consider reference to similar species: <i>Carduus tenuiflorus</i> (winged thistle), <i>Onopurdum acanthium</i> (cotton thistle).	Additions to plan	Reject	Winged thistle and cotton thistle are not declared as pests in the Plan and no amendment to Table 18 is recommended. The Panel considers it more appropriate to provide information and advice on methods to control these rather than taking a regulatory approach.
P335.51	Barrie Wills	In relation to [Appendix 1] Velvet leaf, didymo, <i>Euonymus</i> , needle grass, etc. There are a number of other spp that should be included here, and refer to this appendix at appropriate places in the text above. ORC does not undertake monitoring and surveillance of spindle tree consider it more appropriate to provide information and advice on methods to control hemlock rather than taking a regulatory approach.	There are a number of other spp that should be included here, and refer to this appendix at appropriate places in the text above.	Additions to plan	Reject	MPI lead the national response to velvet leaf and didymo, which are both Unwanted Organisms and ORC supports MPI in this response at a regional level. Chilean needle grass is declared as a Pest in the Plan. Spindle tree is not listed in the National Pest Plant Accord or as an Unwanted Organism and ORC is not aware of surveillance or control programmes being undertaken by other regional councils.
P335.6	Barrie Wills	No mention of <i>Abutilon theophrasti</i> (velvet leaf). Consider adding <i>Buddleja</i> , <i>Cotoneaster</i> , <i>Euonymus</i> , possibly <i>Sorbus</i> spp as and OOI? Consider adding <i>Salix fragilis</i> (crack willow), <i>Artemisia absinthium</i> in Waitaki, <i>Austrostipa nodosa</i> in Waitaki & Central. Include hawkweed spp ( <i>Hieracium/Pilosella</i> ) to prevent unwanted nursery propagation under NPPA. I have seen <i>H. aurantiacum</i> for sale in nurseries. Making reference to Appendix 1 in Organism Declaration section 4.	Consider additions to plan. Make reference to Appendix 1 in beginning of section 4.	Additions to plan	Accept in part	<i>Buddleia</i> , rowan and hawkweed are listed as organisms of interest in the Plan. See response to P069.1 regarding crack willow. The Hearing Panel do not consider an amendment to Part 4 is required.
P336.1	Angus Robertson	Rule 4.1 - support in part: GNR rules should apply to more pest plants. Volunteer groups and private landowners going to the effort of removing pest plants from an area is undone in a season by noncontributing neighbours.	Apply Good Neighbour Rules to more pest plants.	Additions to plan	Reject	The submission does not include information regarding the rules requested to be added, what species they should apply to and why. However, the Panel notes that recommendations are made to include good neighbour rules for old man's beard in response to submission P312.8.
P336.2	Angus Robertson	Rule 4.1 - oppose: Table should also include wider range of pest plants - e.g. <i>convolvulus</i> /bindweed, cow parsnip, hog weed etc.	Table should also include wider range of pest plants - e.g. <i>convolvulus</i> /bindweed, cow parsnip, hog weed etc.	Additions to plan	Reject	See submission P008.2 regarding giant hogweed. It is not clear what other cow parsnip species the submitter is referring to. Bindweed is widespread nationally and the Panel consider it more appropriate to provide information and advice on methods to control this rather than taking a regulatory approach.
P336.4	Angus Robertson	Rule 6.4.3.2 - oppose: this rule should apply to other pest species as well not just gorse and broom (gorse can actually be helpful as a protection for regenerating plantings), and be applied to the wider region, regardless of zoning. Urban areas can house many pest species too as well as rural zones, and be less detected.	This rule should apply to other pest species as well not just gorse and broom.	Additions to plan	Reject	The submission does not include information regarding the additional species that should be included in Rule 6.4.3.2.
P341.2	R L Wilson & R T Redneck	Add thyme and <i>buddleia</i> to the eradication list.	Add thyme and <i>buddleia</i> to the eradication list.	Additions to plan	Reject	<i>Buddleia</i> is widespread nationally and thyme is widespread on Otago and the Panel considers it more appropriate to provide information and advice on methods to control these species rather than taking a regulatory approach. <i>Buddleia</i> and thyme as listed in the Plan as Organisms of Interest and they will be watch listed for ongoing surveillance.
P342.1	Murray Turner	I support the proposal to have hedgehogs, feral cats, stoats and ferrets declared as noxious in all rural localities.	In order to retain what is left of the ground nesting birds in the Otago Region all feral cats, hedgehogs, stoats and ferrets should be eliminated or at least an attempt be made to drastically reduce their numbers.	Additions to Plan	Reject	The submitters support for the inclusion of hedgehogs, feral cats, stoats and ferrets in the Plan is noted. However, at this stage these are included as site-led pests in the Mt Cargill-West Harbour, Quarantine and Goat Islands and Otago Peninsula site-led programmes. ORC staff intend to work collaboratively with communities in the Dunedin site-led areas regarding the management of these pests. These species are widespread nationally and the Panel considers it more appropriate to provide information and advice on methods to control them rather than taking a region-wide regulatory approach, however new site led areas may be added to the Plan over time where these meet the criteria in Appendix 2 of the Strategy.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P343.9	Quarantine Island Kamau Taurua Community Incorporated	The development of annual operation plans should allow for input from the community who are one of the primary agents for achieving the objectives of the Plan. This input is not formally provided for.	Provide for community input into the development of annual operation plans.	Additions to plan	Reject	Section 100B of the Biosecurity Act requires the Operational Plan to be prepared within 3 months. The Operational Plan sets out how ORC will administer the Plan and Strategy actions over the coming 12 months, and ORC will update and report on the Plan outcomes on an annual basis. As this is a plan to report on ORC's operations, community input and consultation on it is not necessary.
P344.1	Malcolm Robertson	Amend the Plan to include Hawthorne as Pest Plant for progressive containment. Hawthorne is a prolific seeder, has long lived seed, is readily spread, can form dense pure thickets excluding native re-establishment, germinates and grows in a wide range of native habitats.	Amend the Plan to include Hawthorn as Pest Plant for progressive containment.	Additions to Plan	Reject	The Panel notes that staff do not have details of distribution or extent of hawthorn and do not currently undertake surveillance of hawthorn in Otago, but are aware of its presence and impacts. Hawthorn is listed in the Plan as an Organism of Interest and it will be watch listed for ongoing surveillance or future control opportunities. Site-led programmes (if regulation is identified as required) could be considered, if detailed information on the distribution of the organism, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided in accordance with Appendix 2 of the Strategy. Additionally, the Panel accepts the staff recommendation that the ORC prepare guidance on the identification, effects and control methods for hawthorn on ORC's proposed on-line 'pest hub' in accordance with the project set out in Section 4.2 of the Strategy. An amendment to Section 4.2 of the Strategy is recommended to make this clear.
P063.1	Aries Hodges	I do NOT support the addition of feral cats, hedgehogs, deer or goats. Humans introduced them and now ya'll want rid of them when they're just trying to live their best lives, AWAY from humans.	Remove feral cats, hedgehogs, deer and goats from the plan.	Amendments to Plan	Reject	These species are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support.
P090.1	Ross Dungey	While much of New Zealand's wildlife is classified as pests in regional pest management plans they are highly valued recreational resources for many NZers and always have been. They are often found in areas that are already highly modified by agriculture. My submission is that that deer,pigs,chamois, & thar should be in a different category than rabbits, wallabies, & possums for example in recognition of their recreational hunting values. As such they should not be subject to attempts to eradicate them & the contribution they make to outdoor recreation in Otago be recognised.	Deer,pigs,chamois and thar should not be proposed for eradication in the Plan, and their recreational value should be recognised.	Amendments to Plan	Reject	See submission P274.1. Chamois are not declared as pests in the Plan.
P095.1	Robert Gale	Feral Deer are a very important resource to New Zealand and numbers should be managed at sustainable levels for the species, and definitely not eradicated. Feral Deer provide recreation for New Zealanders and tourists in the form of hunting/photography, a food resource with the additional benefit of being 100% organic, environment management, grazing reduces the incidence / likelihood of wildfires. Feral Goats & Pigs are also a resource and numbers should be managed at sustainable levels for the species, not eradicated. Feral Goats & Pigs provide similar benefits to deer and form an important cultural and food resource for Maori & Pacifica.	Feral Deer, Goats and Pigs should not be eradicated.	Amendments to Plan	Reject	See submission P274.1.
P108.1	Steve Dougherty	Feral deer, pigs and goats are a resource in most areas and controlled by hunters.	Feral deer, pigs and goats should not be included as a pest in the Plan.	Amendments to Plan	Reject	See submission P274.1.
P122.3	Dawn Sangster	We note that this is a site-led programme but want some assurance that it will not be expanded to include other areas. Our family, friends and many recreational hunters in Otago enjoy hunting deer and pigs.We would like to see a sensible approach to managing these animals rather than a one size fits all.If numbers are not a problem then we don't see the need to fund control of these animals as recreational hunters are doing this. It would be better to fund control of animals such as geese that are impossible for hunters to control.I think that it would cause a lot of ill feeling in the community if these were included such as we saw with the proposed tahr cull.	Oppose addition of feral deer and pigs.	Amendments to Plan	Reject	Feral deer and feral pigs are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. If feral deer and feral pigs pose no threat to sites local to the submitter, there is a high likelihood that no such site-led programme including feral deer and feral pigs will be introduced locally.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P158.1	Lucy Bell	4.1 Table 2 Organisms declared as pests: ONLY possums and mustelids.	Only possums and mustelids should be considered as pest animals.	Amendments to Plan	Reject	This submission point is inconsistent with the submitter's other submission points.
P165.1	Colin Aubrey Craig	The present regulation regarding control of noxious weeds, particularly nodding thistle, in our area has failed, since amalgamation in 1989. Prior to this our Bruce County had a policy of total eradication, was relatively free of this pest thistle and employed an inspector who reported any infestation and the farmer was legally required to destroy same. Now most unsatisfactorily the only requirement is to clear within ten metres of a neighbour. To my knowledge none of these have seeded on our property for many years, yet every year we find nodding thistle seedlings in widely disparate areas of the farm. Seeds are quite obviously being carried by birds from areas of infestation. I deplore the attitude taken by certain councillors many years ago that because they were endemic in north and much of central Otago a programme of eradication could not be maintained in south and west and refusing to alter requirements for our relatively thistle free districts. My major fear is that as a result of the intervening lax restrictions this thistle is now becoming a major problem, even policing of the present inadequate restrictions appears non-existent.	Eradication of nodding thistle in South Otago.	Amendments to Plan	reject	The eradication, progressive containment and sustained control of nodding thistle was assessed in the Cost Benefit Analysis and a sustained control programme has a higher risk adjusted net benefit than eradication. Sustained control is considered the most appropriate approach in the Plan. All land occupiers are required to comply with Rules 6.4.4.1 and 6.4.4.2 regarding control within 100m of property boundaries.
P198.2	Gerry Essenberg	5.2. Additional detail needed for site-led pest programmes. That site-led plans be required for those with responsibility for large areas of land and that these be approved by the O.R.C.	That urban areas, road managing authorities, railways, large runs > 1000ha, DOC, ORC, District Councils provide a management plan for lands under their control.	Amendments to Plan	Reject	The Panel agrees that landowners and authorities with large areas of land would benefit from developing plans regarding the management of pests on their property and encourage landowners and authorities to do this. However, this is different to a site-led programme in the Plan, described in Section 5.2. Site-led programmes seek to control pests within a place to protect the values of that place. No amendments to the Plan are recommended as this is an operational matter.
P201.2	Dunedin City Council	As a general comment, the DCC recommends the proposed Regional Pest Management Plan (RPMP) takes a forward-looking, preventative approach. The proposed RPMP comprehensively addresses current issues with pest animals and plants, but could do more to anticipate and address future pest management issues.	The Plan attempt to anticipate and address future pest management issues.	Amendments to Plan	Note	The Panel agrees that the Council needs to be forward-looking. Identifying Organisms of Interest in the Plan and prioritising additional biosecurity actions in the Strategy supports the rules in the Plan so that ORC can be forward-looking and preventative.
P201.4	Dunedin City Council	The DCC notes a complexity in relation to the responsibilities of occupiers (including owners), as outlined at 3.3.1 (page 15). The DCC often receives notices from the ORC regarding noxious weeds in road reserves that are fully occupied by the neighbouring private landholder, and are effectively being used as parts of the private landholder's garden. Such usage is unofficial, but tolerated by the DCC. The DCC recommends responsibilities for weed control would be most effective if they sat with the occupier of the land in these circumstances, and not with the owner. The DCC recommends additional drafting be inserted in 3.3.1 to clarify that responsibilities lie with the occupier in the first instance where the occupier and owner are not the same.	The DCC recommends additional drafting be inserted in 3.3.1 to clarify that responsibilities lie with the occupier in the first instance where the occupier and owner are not the same.	Amendments to Plan	Accept	Additional clarification to Section 3.3.3 Road Reserves and Rail Corridors is recommended to ensure it is clear that if a road reserve is physically occupied by the adjoining private landowner, that the person physically occupying that space has responsibility.
P201.5	Dunedin City Council	Road reserves and rail corridors (proposed RPMP, 3.3.4) The DCC supports the proposal at 3.3.4 (page 17) that KiwiRail and ORC will work by agreement to manage mutual obligations and expectations in relation to the management of pests in the rail corridor. The DCC recommends the ORC and DCC work together in the same manner in relation to the management of pests alongside roads within the Dunedin City boundary.	That ORC and DCC work together to manage mutual obligations and expectations in relation to the management of pests alongside roads within the Dunedin City boundary	Amendments to Plan	Reject in part	No amendments to the Plan are recommended. KiwiRail operates nationally and there are cross boundary and pathway issues that ORC staff will work with KiwiRail on. DCC's responsibilities regarding road reserve are set out in Sections 3.3.3 and 3.3.4 and these are consistent for all Territorial Local Authorities. The Panel notes that ORC staff can work with DCC regarding these obligations, but this is an operational matter and no amendment to the Plan is required to reflect this.
P209.1	Mike Hazel	Bomarea - change from contain to eradicate. Have spent 10 or so years on Bomoarea in line with ORC's previous policy. Another 10 years should eradicate it.	Recategorise Bomarea from a containment species to an eradication species.	Amendments to Plan	Reject	The eradication and progressive containment of bomarea was assessed in the Cost Benefit Analysis and a progressive containment programme has a higher risk adjusted net benefit than eradication. Progressive containment is considered the most appropriate approach in the Plan. All land occupiers are required to comply with the rules.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P210.3	Guardians of Lake Hawea	In relation to control methods for these species, and other pest plants along the shores of Lake Hawea, we request that you engage with us and the Hawea community over control methods to be used. We understand that spraying is widely used, and may be the best tool for the purpose, but are concerned about the possibility of toxins entering the lake. We note that the Canterbury RPMS has a section: "5.5 Community engagement Environment Canterbury works with the community to deliver pest management outcomes. This may include seeking community advice on plan implementation to inform the operational local inspection requirements, information and service delivery needs and identification of new pest issues." In relation to Section 3, we therefore request that a similar statement be included in the Otago RPMP, at section 3.3, and included in the Operating Procedures that are referred to in section 3.1.	Add a 'Community Engagement' section to the Plan at section 3.3, similar to that included at section 5.5 of the Canterbury RPMP, with consequential amendments to Operating Procedures at section 3.1 of the Plan.	Amendments to Plan	Accept in part	The Panel notes that ORC staff attended a meeting in January 2019 with DOC, LINZ, and landowners adjoining Lake Hawea regarding weed control. Staff intend to continue this if it is of benefit. Section 5 in the Plan has been amended to include Community Engagement as this explains the pest management framework ORC works within. Therefore, no amendments are recommended to Section 3.
P211.11	John Parker	I'm pleased that Bomarea species are covered in "Section 6.3 Pests to be managed under progressive containment programmes" with occupier responsibility rules. The community have made great efforts to reduce this problem vine since it was added to the ORC PMS in 2009. However I am disappointed to note that it is now listed for Progressive Containment, instead of "Eradication from the Otago Peninsula within 5 years of the strategy becoming operative" (ORC RPMS 4.9.3). In my view this is a consequence of the lack of ORC resources and insufficient staff to implement the strategy and enforce rules requiring occupiers to destroy Bomarea on their land. I understand that it is difficult and time consuming to ensure compliance with some rental properties and would like Council to consider methods to solve the problems of absentee landowners.	Seeks eradication of Bomarea. Request additional methods for dealing with absentee landowners.	Amendments to Plan	Reject	The eradication and progressive containment of bomarea was assessed in the Cost Benefit Analysis and a progressive containment programme has a higher risk adjusted net benefit than eradication. Progressive containment is considered the most appropriate approach in the Plan. All land occupiers are required to comply with the rules.
P222.2	Environment Canterbury	Environment Canterbury seeks further consideration regarding provision 6.3.2.5 (nassella tussock). We recommend that this provision is amended to include a date by which control must be undertaken. In Canterbury, we have set dates for control to be carried out to enable inspections prior to viable seed set. We consider this an important part of the provision due to the plant producing high numbers of seed which is easily wind-blown.	Amend Rule 6.3.2.5 (nassella tussock) to include a date by which control must be undertaken.	Amendments to Plan	Reject	Nassella tussock in Otago affects approximately 30 land occupiers with localised infestations. Nassella tussock is not widespread, and is being effectively progressively contained. The Panel notes that staff consider no date by which control must be undertaken is needed in the Plan rule. ORC staff currently undertake two inspections per year, one in winter and one prior to seeding. Where land occupier control is required as a result of those inspections, dates by which control must be undertaken is specified in ORC's letter to the land occupier.
P222.3	Environment Canterbury	We also recommend an amendment to provision 6.3.2.3 (bur daisy) to include a date by which control must be undertaken. Bur daisy is present at the boundary between Otago and Canterbury. Environment Canterbury is responsible for control of bur daisy in Canterbury and has often undertaken multiple control operations to prevent seed set. Setting a date for control to be completed by would enable Otago Regional Council to undertake inspection processes before seeding occurs.	Amend Rule 6.3.2.3 (bur daisy) to include a date by which control must be undertaken.	Amendments to Plan	Reject	Bur daisy in Otago is confined to one 10ha site, and with one land occupier. ORC inspects the site at least annually. Where land occupier control is requested as a result of those inspections, a date by which control must be undertaken is specified in ORC's letter to the land occupier. The Panel is satisfied that the current approach is effective and accept the staff view that no further specificity in the Plan is considered necessary.
P258.24	Forest and Bird	Conservation Management Strategy: As noted in our pre consultation feedback, the proposed, the Regional Pest Management Plan (RPMP) needs to reference the Department of Conservation's Conservation Management Strategy (CMS) for the region. Forest and Bird consider the RPMP should note and explain the relationship between the Strategy and the CMS. The legislative basis for this inclusion is Section 66 (2) (c) (i) of the Resource Management Act, which places a responsibility on the Otago Regional Council to have regard for the outcomes, policies and objectives within the CMS when reviewing the RPMP. The importance of the CMS in planning processes has recently been reiterated in case law that emerged from the Ruataniwha Supreme Court decision.	The Plan is amended to refer to the Department of Conservation's Conservation Management Strategy (CMS) for the region.	Amendments to Plan	Reject	Conservation Management Strategies are prepared under the Conservation Act 1987. The relationship with the Conservation Act is set out in Section 2.2.6 of the Plan and the role of a regional councils under the Conservation Act in relation to pest management is limited to advocacy. The Panel notes that the plan is being prepared under the Biosecurity Act rather than the Resource Management Act.
P258.7	Forest and Bird	Section 5.3. Forest and Bird supports the principal measures except that when there are rules in a plan land occupiers or other persons should be required to act, otherwise it is not a rule.	Requirement to Act' should be a measure used in implementation of Rules.	Amendments to Plan	Accept	The requirement to act is stated within the principal measures that relate to the Plan objectives, however the Panel seeks to reinforce that landowners are required to take action when directed to do so. Therefore, the Panel recommends amending the use of 'may' to 'shall' in Section 5.3.
P261.1	Chris Jenkins	Eradication programmes , Oppose deer and pigs as they are a recreational animal that many hunters and outdoor people are able to hunt.	Remove deer and pigs from the plan.	Amendments to Plan	Reject	Feral deer and feral pigs are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. No region wide eradication is proposed.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.18	Queenstown Lakes District Council	Page 79: The ORC's support to deliver the objectives with Land Information New Zealand is described more fully in Section 3 of the Proposed Biosecurity Strategy. We suggest the information in the two documents is presented consistently for clarity.	The Plan's description of the lagarosiphon programme at page 79 is amended to that at section 3 of the Proposed Biosecurity Strategy.	Amendments to Plan	Reject	The Panel recommends retaining the description of the lagarosiphon programme as notified. The Plan is a regulatory document and sets out the programmes, rules and principal measures to manage lagarosiphon. More detail is provided in the Strategy to provide an overview of the collaborative approach to lagarosiphon management in Otago. The Panel notes that Section 3 of the Strategy is specifically referenced in Table 29 of the Plan.
P263.2	Queenstown Lakes District Council	In terms of structure, the summary on the second page of the Pest Management guide document provides concise and clear reference material that we suggest could be included and referenced at the beginning of the Plan; for example, pest classification and a key to what type of management programme will apply to each pest.	The Plan is amended to include a summary at the beginning, similar to that provided in the pest management guide document.	Amendments to Plan	Accept	A summary at the beginning of the Plan is a useful way to provide a simple overview of the species and programmes in the Plan. A diagram is recommended at the beginning of the Plan to illustrate this.
P266.3	Lindis Pass Conservation Group Inc	5.(5) Pest Management Framework: Community engagement. The associated Canterbury Regional Pest Management Plan, in Section 5.5, contains a provision for Community engagement. It is hard to understand why this has been left off this almost identical pest plan for Otago, as substantial pest control of both animals and plants is carried by volunteer community groups, often under the supervision of the Dept. of Conservation. If it wasn't for the consistent and very professional work of groups who trap and weed, Otago's pest problems would be in much worse shape than they presently are. While site-led volunteer programmes have physical (site) boundaries on them, they also have a wider effect in halting or reducing the natural spread of pest plants and animals, they act as islands of safety for threatened native species. We submit that the ORC should recognise this essential contribution, and arrange to work with it. 1. ORC to reinstate in the Plan a commitment to work with community groups who eliminate pests in their areas by organised and consistent volunteer work. 2. The wording would be, "Otago Regional Council also works with the community to deliver pest management outcomes. This may include acknowledging, working with and supporting the work done by community organisations; and seeking community advice on plan implementation to inform the operational local inspection requirements, information and service delivery needs and identification of new pest issues. Community engagement on site-led initiatives is another way for the pest objectives to be achieved."	1. ORC to reinstate in the Plan a commitment to work with community groups who eliminate pests in their areas by organised and consistent volunteer work.	Amendments to Plan	Accept in Part	The Panel agrees that adding an explanation on community engagement in the Plan to recognise the work communities do and how ORC supports this work is an important addition. Section 5 in the Plan has been amended to include a new section titled Community Engagement.
P266.6	Lindis Pass Conservation Group Inc	6.4. Pests To Be Managed Under Sustained Control. Russell Lupin and yellow broom may be better managed under Progressive containment, to gradually restrict them to sites where they have less opportunity to spread.	ORC to manage Russell lupin and yellow broom under progressive containment programmes.	Amendments to Plan	Reject	The progressive containment and sustained control of broom was assessed in the Cost Benefit Analysis and a sustained control programme has a higher risk adjusted net benefit than progressive containment. All land occupiers are required to comply with the rules. As Russell lupin is a new species to be managed in the Plan, and is planted on some farms as a crop for stock, a sustained control programme is considered appropriate.
P274.1	Paul Mettmann	Relating to 4.1 Table 2. Feral deer, feral goats, and feral pigs should not be included in the list of pest species. These animals are a valued resource to New Zealanders and visitors to the region. 1.They are a valued and well utilized form of food. 2.They are of great cultural significance in that there is a long standing tradition in Otago of harvesting these animals. 3.They provide commercial opportunities in Otago through hunting and guiding tourism and the recreational hunting spend. Furthermore the numbers of these animal is at this time in check in most areas as a result of efforts by recreational hunters, and current culling operations. I can't see this changing as all types of hunting becomes more and more popular in Otago. These animals were introduced here by the people of New Zealand, for the people of New Zealand. Local government does NOT have the right to classify them as "pests" and in doing so defame and attempt to wipe out these animals.	Remove feral deer, feral goats and feral pigs from the plan	Amendments to Plan	Reject	Feral deer, feral goats and feral pigs are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. No region wide eradication is proposed.
P276.1	Ministry for Primary Industries	MPI led programmes: MPI would like to thank the Council for supporting the National Pest Plant Accord and the National Pest Pet Biosecurity Accord programmes. MPI recommends that ORC include other national pest management programmes, in particular the Freshwater Biosecurity Partnership Programme and the Velvetleaf Management Programme. The Freshwater Biosecurity Partnership Programme aims to reduce the spread and impacts of freshwater pests, increasing understanding of freshwater pests among all freshwater users and for freshwater users to adopt behaviour that prevents the spread of pests. The Velvetleaf Management Programme aims to stop the spread of velvetleaf within and between farms, increase knowledge on how to effectively manage this weed and to support landowners and rural contractors to control velvetleaf.	The Plan includes other MPI led national pest management programmes, particularly the Freshwater Biosecurity Partnership Programme and the Velvetleaf Management Programme.	Amendments to Plan	Accept	It is recommended that Section 2.1.2 of the Plan be amended to acknowledge the Freshwater Biosecurity Partnership Programme and the Velvetleaf Management Programme as these are both important MPI led programmes in Otago.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P285.4	Ernslaw One Ltd.	5.2 Pest Management Programmes (3) Progressive Containment Programme - the wording does not match the proposed rules.	No specific relief requested.	Amendments to Plan	Reject	The requested relief is not clear.
P285.5	Ernslaw One Ltd.	Ernslaw One submit that this regulation is both too late and unreasonable to achieve. Old Man's beard has been growing on the river and roadside reserve down the Clutha river below Roxburgh for over 20 years. Despite our efforts to prevent its spread from neighbouring land into our forest with chemical and hand cutting we have had only marginal success. We submit that containment is a more achievable approach.	Oppose the requirement in Plan Rule 6.3.2.6 that occupiers shall eliminate old man's beard on land they occupy. The rule is amended to focus on containment of the species.	Amendments to Plan	Reject	The Panel notes that the amendment sought by the submitter is a rule that stops the spread of old man's beard between properties. A boundary rule would form a sustained control programme. The rule in the Plan instead requires occupiers to eliminate old man's beard on land they occupy in order to achieve the progressive containment objective. The rule is consistent with the Operative Plan and the Cost Benefit Analysis illustrates that a progressive containment programme has a higher risk adjusted net benefit than sustained control (such as boundary rules). All land occupiers are required to comply with the rules. Staff can provide advice to Ernslaw One Ltd to assist in the control of old man's beard.
P286.3	New Zealand Transport Agency	Section 3.3 Affected parties. This section should include 'Crown entities', which includes the Transport Agency. It is recommended the following words be added: "3.3.4 The New Zealand Transport Agency is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to provisions applicable to a land occupier for the purposes of obligations for pest control, on road reserves or verges in terms of the Act (as described in Part Two of this plan).	Section 3.3 is amended to include reference to Crown Entities, including the New Zealand Transport Agency.	Amendments to Plan	Accept	The Panel agrees that amending Section 3.3.4 to reference NZTA as a Crown entity would clarify how that Plan applies to them.
P286.5	New Zealand Transport Agency	The Transport Agency requests that ORC extend the offer that was extended to KiwiRail and captured in section 3.3, to enable Council and the Transport Agency to work by agreement to manage mutual obligations and expectations. Because the road corridor and rail corridor can run alongside each other it is important that these obligations and expectations for both the road corridor and rail are transparent to enable better collaborative effort for pest control outcomes. It is also important that both KiwiRail and the Transport Agency are represented on the biosecurity technical working group to ensure better coordination, implementation and results of any biosecurity efforts.	Include the Transport Agency in the development of agreements under section 3.3.5 in order to adequately address cross boundary pest management issues.	Amendments to Plan	Accept in part	Both NZTA and Kiwirail are occupiers of land under the Act, and Section 3.3.4 is therefore recommended to be amended to acknowledge that ORC will work with NZTA by agreement to manage mutual obligations and expectations.
P286.7	New Zealand Transport Agency	Section 6.2 Pests to be managed under eradication programmes: The Transport Agency will be required to eradicate all pests on its land by 2028. This is governed by Objective 6.2.3. The Transport Agency seeks clarification regarding the eradication programme and responsibility for incursion control. From the proposed plan it is read that the Council is responsible for the control of eradication species including spiny broom (i.e. the Transport Agency is not responsible).	Request clarification regarding the eradication of spiny broom.	Amendments to Plan	Note	The eradication of spiny broom is the responsibility of the ORC and no land occupier rules are included. Table 9 in the Plan states ' <i>Otago Regional Council will take responsibility for undertaking the eradication programmes for rooks and spiny broom</i> '.
P289.3	Director General of Conservation	I support the ORC being responsive and flexible, and taking an integrated and collaborative approach to regional pest and weed control. The Department seeks to work collaboratively with the ORC to support implementation of its Biosecurity Strategy and RPMP and providing value where appropriate to protect biodiversity. However, the compliance and enforcement provisions in the plan should be strengthened to ensure that they are an effective means of achieving the RPMP goals, even if only used as a last resort. Provisions in the Biosecurity Act provide for enforcement and the plan should clearly set out the enforcement methods proposed by the ORC to achieve it. The rules sections of the plan should provide for and set out when enforcement will be undertaken by the Council.	Strengthen the compliance and enforcement provisions. Clarify enforcement methods proposed. Amend rules to set out when enforcement will be undertaken.	Amendments to plan	Reject	All principal measures for Plan objectives include the requirement to act and all rules state that a breach is an offence under section 154N(19) of the Act. Additionally, Section 8.2 of the Plan sets out that offenders can be prosecuted and convicted. This content is consistent with most other pest management plans nationally and no changes are recommended.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P289.4	Director General of Conservation	I recommend that the Council give priority to the eradication of Spartina and African Love Grass. The draft plan proposes progressive containment for these species. I believe that a concerted effort by the Department, ORC and private landowners could rid the region of these species.	Eradication of Spartina and African Love Grass.	Amendments to Plan	Reject	The eradication and progressive containment of spartina and African love grass was assessed in the Cost Benefit Analysis and a progressive containment programme has a higher net benefit than eradication for both species. Progressive containment of these species is considered the most appropriate approach in the Plan. The Panel acknowledges that the long term goal for both species is eradication, but is satisfied following further information provided by staff and the submitter that this is not likely to be achievable within the life of the Plan. Control programmes for these species are on-going and eradication is the long term goal. The Panel notes a recommendation to Council that it continues to build on the gains in controlling Spartina by working effectively with other agencies with the longer-term view of including this species as a candidate for eradication in the subsequent Pest Management Plan in 10 years' time.
P293.14	Otago Peninsula Biodiversity Group	Point 9.2 (page 94): The cost-benefit analysis could be better explained, so that readers are not referred to additional information and understand the intensity level of analysis.	Better explain the cost benefit analysis	Amendments to Plan	Reject	A summary of the Cost Benefit Analysis, including the intensity level of analysis is included in Table 31 and an explanation of how this was undertaken is provided in Section 9.2. The full Cost Benefit Analysis assesses this comprehensively. The additional level of detail requested is not appropriate for the Plan, which should focus primarily on the objectives and rules.
P293.2	Otago Peninsula Biodiversity Group	Point 4.1 (page 19): OPBG support the list of animals declared as pests. Please re-word the section on the statutory obligations which currently reads: "[...] ban anyone from selling, propagating or distributing any pest, or part of a pest, covered by the Plan" to ensure that OPBG can continue to provide the university with possums for their dissection classes and OPBG possum trappers can continue to sell their furs.	Re-word 4.1 paragraph 2 to ensure Possums can be provided to the university for dissection and possum furs can be sold.	Amendments to plan	Reject	The process outlined in Section 8.3 provides a process for OPBG to apply for an exemption from the provisions relating to possums. It is recommended that OPBG seeks an exemption through this process rather than through an amendment to the Plan itself. The Panel notes that ORC staff are able to assist OPBG with more information on this process if required.
P294.4	Save The Otago Peninsula	3.3.1 Responsibilities of occupiers (including owners) STOP recommends that the occupier has responsibility for weed control, and that this may not always be the owner. This will save ORC staff time when dealing with compliance and make it more straightforward when road reserve (owned by DCC) is being used by an adjacent landowner. Road reserves, which are not grazed by farm stock, act as vegetation corridors. If well managed, this vegetation provides habitat for birds and invertebrates i.e. green corridors. However, pest plants thrive on road reserves, therefore it is important that responsibilities over ownership (owner or occupier) are clarified.	Clarify land owner and land occupier responsibilities.	Amendments to plan	Accept	See response to submission P201.4.
P295.11	Landscape Connections Trust Halo Project	LCT are working towards goals for 2050. The PRPMP is just the first ten years, and we need to keep our focus on our 2050 goals. We recommend using the term "sustained control" and not "sustainably control" throughout.	Plan references to 'sustainably control' are amended to 'sustained control' throughout the plan.	Amendments to plan	Accept	Sustained control is a term defined in the NPD and is defined in Section 5.4 of the Plan as 'to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties' and sustainable control on the objective has the same meaning. The Panel recommends the objective should be amended, with consequential amendments throughout the Plan.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.15	Predator Free Dunedin	PFD are working towards goals for 2050. The PRPMP is just the first ten years, and we need to keep our focus on our 2050 goals. We recommend using the term “sustained control” and not “sustainably control” throughout.	Plan references to 'sustainably control' are amended to 'sustained control' throughout the plan.	Amendments to plan	Accept	See response to P295.11
P298.17	Predator Free Dunedin	Incorrect objectives referred to in Table 26. Incorrect heading at 6.1.3.	Correct objectives referred to in Table 26, and correct heading at 6.1.3.	Amendments to plan	Accept	The submission is recommended to be accepted as it seeks to correct minor errors in the Plan.
P312.18	Land Information New Zealand	Plan Rule 6.4.4.1 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: All occupiers in the Otago region on rural zoned land shall eliminate nodding thistle infestations on their land within 50m of the adjoining property boundary where the occupier of the property is eliminating nodding thistle infestations within 50m of that boundary.	Amendments to Plan	Reject	No amendment to the nodding thistle rule to reduce the boundary clearance from 100m to 50m is recommended. The Operative Plan requires this distance to be kept clear, and the Plan is consistent with this. The rule poses no additional obligation on land occupiers than it did previously, although as a Good Neighbour Rule, it now binds the Crown too.
P312.19	Land Information New Zealand	Plan Rule 6.4.4.2 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: All occupiers in the Otago region on rural zoned land shall eliminate ragwort infestations on their land within 20m of the property boundary where the occupier of the adjoining property is eliminating ragwort infestations within 20m of that boundary.	Amendments to Plan	Reject	No amendment to the ragwort rule to reduce the boundary clearance from 50m to 20m is recommended. The Operative Plan requires this distance to be kept clear, and the Plan is consistent with this. The rule poses no additional obligation on land occupiers than it did previously, although as a good neighbour rule, it now binds the Crown too.
P312.8	Land Information New Zealand	Section 6.3.2 Good Neighbour Rule for old man’s beard: LINZ submits that a Good Neighbour Rule is required to achieve progressive containment of old man’s beard.	Add the following Good Neighbour Rule to Section 6.3.2: Note: This is designated as a Good Neighbour Rule 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. A breach of this rule creates an offence under section 154N(19) of the Act.	Amendments to Plan	Accept	The Hearing Panel heard from the submitter at the Hearing and was of the view there was merit to further assess the submitter's request further through the current Plan review process. Further consultation with submitters and a cost benefit analysis in accordance with the Act and National Policy Direction were directed in Minutes 6 & 7. Upon considering the additional information the Panel accepts the submit request and recommends that a Good Neighbour Rule is included in the plan to control old man's beard as a progressive containment species.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P327.3	Alex Kerr	I oppose the classification of feral goats, feral deer and possums as pests. 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.	Remove feral deer, feral goats and feral pigs from the plan	Amendments to Plan	Reject	Feral deer, feral goats and feral pigs are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. No region wide eradication is proposed.
P330.1	Donna Suzanne Tomkin	I am an animal welfare advocate. I do not like intensive hunting. I am a goat enthusiast - do not want ALL goats, deer or pigs eradicated.	Do not want ALL goats, deer or pigs eradicated	Amendments to Plan	Note	The Plan does not propose to eradicate goats, deer or pigs.
P332.1	Kāi Tahu ki Otago	Section 2.1.2 - Wider biosecurity framework - Under National strategies and programmes, 3rd to last line, sentence starts "The proposal seeks to..." This terminology creates uncertainty.	Please clarify whether this is that intended to mean "This proposed Otago Regional Pest Management Strategy...."	Amendments to plan	Accept in part	The amendment sought to change 'proposal' to 'the Plan' reflects the intent of the section and improves clarity.
P332.11	Kāi Tahu ki Otago	Section 8.3 - Power to issue exemptions to plan rules - 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: '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' 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.	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.	Amendments to plan	Reject	The Panel notes that following the Hearing, Kāi Tahu ki Otago clarified that no customary harvest of perennial nettle occurs, rather it is taraonga (tree nettle) that is harvested. The Panel is satisfied that given this is a native species and is not a pest in the Plan, no exemption is required by the submitter. The Panel accepts the staff recommendation that the Plan be amended to 'Ongoing consultation is also required to ensure implementation of the Plan provides for the customary harvesting of species' in 2.4.
P332.12	Kāi Tahu ki Otago	Section 9.3.1 - Effects on Maori - This statement is supported by Te Rūnanga o Ōtākou given the potential for pests to adversely impact upon taonga species and mahika kai. 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.	In the second paragraph Kāi Tahu should be changed to <u>Kāi Tahu ki Otago</u> in both instances	Amendments to plan	Accept	The submitter's amendment provides more accurate wording and representation.
P332.16	Kāi Tahu ki Otago	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.	Reference and take into account the Kāi Tahu ki Ōtago Natural Resource Management Plan (2005) in any instance that will have a direct impact on recognised wahi tapu or cultural landscapes.	Amendments to plan	Accept	It is recommended that Section 2.4 of the Plan is amended to acknowledge the Kāi Tahu ki Ōtago Natural Resource Management Plan (2005): " <i>In Otago, the Kāi Tahu ki Ōtago Natural Resource Management Plan 2005 outlines particular issues in relation to pest management and biodiversity and includes particular areas or sites of value. Using this plan as a basis, ongoing consultation will be maintained during the life of the plan to discuss pest species that are having an impact on sites of value to rūnanga</i> ".
P332.17	Kāi Tahu ki Otago	Glossary (p.105) - Kāi Tahu - 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.	Amend definition to read: Kāi Tahu – descendants of Tahu, the tribe, <u>tangata whenua who maintain manawhenua within Otago and much of Te Waipounamu, the South Island.</u>	Amendments to plan	Accept	It is recommended the wording is adopted as proposed. This ensures the Plan definition aligns broadly with the definition in the Partially Operative Otago Regional Policy Statement.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P332.18	Kāi Tahu ki Otago	Glossary (p.105) - Suggest addition of a definition for Kāi Tahu ki Otago. 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.	Add: <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>	Amendments to plan	Accept	The definition provides additional and relevant context given the distinction to the definition of Kāi Tahu.
P332.2	Kāi Tahu ki Otago	Section 2.2 - Legislative Background - 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.	Add the following statute and policy documents to Section 2.2 "Legislative Background": Ngāi Tahu Claims settlement Act 2008, Kāi Tahu ki Otago Natural Resources Management Plan, Ngāi Tahu Freshwater Policy	Amendments to plan	Reject in part	Section 2.4 of the Plan sufficiently outlines the obligations of Regional Council in respect to the requirements set out under the Local Government Act. The amendments recommended to Section 2.4 may address the submitter's concerns in part: <i>'In Otago, the Kāi Tahu ki Otago Natural Resource Management Plan 2005 outlines particular issues in relation to pest management and biodiversity and includes particular areas or sites of value. Using this plan as a basis, ongoing consultation will be maintained during the life of the plan to discuss pest species that are having an impact on sites of value to rūnanga. Ongoing consultation is also required to ensure implementation of the Plan provides for the customary harvesting of species'</i> .
P332.3	Kāi Tahu ki Otago	Section 2.3.2 - Resource Management Act Plans - Reference should be made to planning documents recognised by an Kāi Tahu as an iwi authority such as: Kāi Tahu ki Otago Natural Resources Management Plan (2005), Ngāi Tahu Freshwater Policy. This will be consistent with provisions of the RMA such as section 66.2(A)(a) that recognised planning documents be taken into account.	Refer to Kāi Tahu ki Otago Natural Resources Management Plan (2005) and Ngāi Tahu Freshwater Policy in Section 2.3.2.	Amendments to plan	Accept in part	Section 2.3.2 assesses the Plan against the need to ensure the Plan is consistent with the Otago Regional Policy Statement or any plan developed in accordance with the Resource Management Act 1991.
P332.4	Kāi Tahu ki Otago	Section 2.4 - Relationship with Maori - 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 rūnaka of Kāi Tahu ki Otago, being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otakou, and Hokonui Rūnanga. 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'. 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.	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 rūnaka of Kāi Tahu ki Otago, being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otakou, and Hokonui Rūnanga.	Amendments to plan	Note	The Panel notes that further clarification identifying the specific amendments were sought from the submitter. The submitter did not present its submission at the Hearing. However it is noted that a number of amendments have been recommended to the Plan and Strategy to recognise Kāi Tahu and rūnaka.
P332.5	Kāi Tahu ki Otago	Section 2.4 - Relationship with Maori - 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). 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.	Amend the reference to 'considering ways to help Māori to contribute' 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).	Amendments to plan	Note	The Panel notes that further clarification identifying the specific amendments were sought from the submitter. The submitter did not present its submission at the Hearing. The Panel notes the requested amendment.
P333.6	Environment Southland Regional Council	ES notes that the scientific name of African Feather Grass is now "Cenchrus macrourus" not "Pennisetum macrourum".	Amend the scientific name of African feather grass to "Cenchrus macrourus".	Amendments to plan	Accept	This amendment is recommended to be accepted to correct an error.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P335.1	Barrie Wills	Check full document for abbreviation usage.	Consistency with abbreviations. Consider an appendix outlining abbreviations alphabetically. Include both full title and abbreviation at first appearance within each chapter followed by abbreviation only throughout chapter.	Amendments to Plan	Accept in part	Abbreviations are intentionally not used in the foreword of the Plan, in titles of plan sections or the beginning of key sections of the plan (for emphasis), but are used elsewhere. Minor amendments are recommended to the Plan.
P335.10	Barrie Wills	In relation to [Section 5.3 & 5.4] Why such extensive use of the word "may(be)" which essentially lets council off the hook in terms of rigorous inspection and enforcement?? Consider using words to the effect of "will be" unless genuine mitigating circumstances exist. As I read this section, the so-called "Requirement to Act" will simply result in the status quo enduring, i.e. less than ideal containment and control. There is little to be gained from having these rules & regulations if ORC are not prepared to police and enforce them. The classic example is the dissemination of broom & gorse from gravel pits, mainly in County Council / Catchment Board days, now well established along roadsides and frequently spread into neighbouring farm paddocks. While NZTA & Councils do have contracts to spray the road reserves, no effort is made to control plant spread, often just inside adjacent boundary fences. Under the new 'good neighbour' ruling, any broom/gorse plants up to +/-5m inside adjacent properties should be subject to control, and vice-versa if spread is on to road reserves from uncontrolled pest weeds within private property. [in relation to table 19]: Again the word 'may'. Can you not be a bit more proactive ????? ORC might do a lot of things, but actions (or lack thereof) to date indicate that is rather unlikely.	Consider using words to the effect of "will be" in section 5.3 unless genuine mitigating circumstances exist.	Amendments to plan	Accept in part	The use of 'may' in Section 5.3 and in the tables reflects that a variety of principal measures exist to manage pests. The measures employed to respond to a pest management issue will depend of the circumstances of the issue. This does not negate ORC from undertaking enforcement action where this is needed. However, the Panel seeks to reinforce that landowners are required to take action when directed to do so and that the ORC can undertake enforcement action where this is needed. Therefore, the Panel recommends amending the use of 'may' to 'shall' in Section 5.3.
P335.13	Barrie Wills	In relation to [Table 6 & Table 9] Eradication programmes should exist in perpetuity, therefore carry over regardless of plan revisions.	Edit plan objective 6.1.3 to promote perpetuity of eradication programmes	Amendments to Plan	Reject	All plan objectives use this drafting style. No amendment is recommended.
P335.14	Barrie Wills	In relation to [Table 6 & Table 9] 'Principle measures' in Table 6 in ordinary text, is bold text in Table 9. Be consistent.	'Principle measures' in Table 6 in ordinary text, is bold text in Table 9. Be consistent.	Amendments to Plan	Accept	This corrects a minor error.
P335.15	Barrie Wills	In relation to [Table 6] You refer to Plan Objective 1 - specifically what is that? I presume it refers to Objectives/Programs outlined on Pg23, but I do not see anything under that heading.	Clarify the origin of Plan Objective 1 in Table 6	Amendments to Plan	Accept	This should read: Objective 6.1.3. This corrects a minor error.
P335.17	Barrie Wills	In relation to [Table 9 & Table 14] [It is therefore preferable for beneficiaries rather than exacerbators to bear the responsibility for eradication.] Put this in plain english please, some will think you are involving WINZ beneficiaries!! Make reference to explanation in section 9.4!!!!	Consider an alternative to the words 'beneficiaries' and 'exacerbators' e.g. 'ORC/TLA's' and 'Owners/occupiers' respectively. Make reference to section 9.4.	Amendments to Plan	Reject	Beneficiaries and exacerbators are defined in the Glossary of the Plan and no further explanation of these term is considered necessary.
P335.18	Barrie Wills	In relation to [Table 9] [Similarly, an inequitable burden exists for Bennett's wallaby.....]	Replace 'for' with 'in relation to'	Amendments to Plan	Accept	This corrects a minor error.
P335.2	Barrie Wills	In relation to [3.3.1 Responsibilities of occupiers - pest management is an individual's responsibility in the first instance] Not so where dispersal methods can carry a pest across significant physical and geographic boundaries, eg nodding thistle, wildings, broom, wallabies. In such cases the 'occupier' becomes the unwitting recipient of the pest problem, does not actively contribute to it!! The proposed PMP needs to acknowledge this.	Acknowledge that pest management involving cross boundary dispersal is not always the responsibility of occupier.	Amendments to Plan	Reject	This statement in Section 3.3.1 reflects that pest management in accordance with the rules of the Plan is a occupier responsibility. An assessment of the beneficiaries and exacerbators was undertaken and the Panel notes this issue raised in this submission was acknowledged in that assessment.
P335.21	Barrie Wills	In relation to [Plan Rule 6.3.2.1-9] Why repeat each of these spp under different rule numbers? Consider consolidating to simplify the document.	Consider consolidating to simplify the document.	Amendments to Plan	Reject	This amendment would be inconsistent with the other Plan rules.
P335.3	Barrie Wills	In relation to [3.3.4 Road reserves and rail corridors - For the purposes of this Plan, the control of pests on roads is the responsibility of occupiers of roads. For formed roads, the person responsible for the general management or control of the main carriageway is the occupier.] Need to specify "Occupier". In other words that responsibility lies with NZTA or the District Council. What about unformed roads and access tracks? As Chair of CODC Roding Ctte, I fail to see how the TLA can police or control presence of animal pests in particular on their roads. Plant pests are detectable and controllable yes, but migrating wallabies, possums, pigs, goats etc certainly are not.	Need to specify "Occupier". In other words that responsibility lies with NZTA or the District Council. What about unformed roads and access tracks?	Amendments to Plan	Reject in part	Amendments have been recommended in response to submission P201.4 and P286.3, 286.5 to made the occupier responsibilities in road reserves clearer.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P335.37	Barrie Wills	In relation to [Plan Objective 6.4.4] So WHO is actually responsible???? In 6.4.3 you at least refer to Occupiers. Here, nothing?? Be consistent. And what happens where neither neighbour is carrying out adequate control, no-one complains about non-compliance, so no 100m barrier exists and noddors just continue to spread?? How is ORC going to police that, or are they not going to bother?? This reads as a complete cop-out on behalf of ORC, ditto for ragwort.	Elaborate on alternatives under Plan Objective 6.4.4 and be consistent with other objectives. Will occupiers generally be responsible??	Amendments to Plan	Reject	Occupier responsibilities are clearly set out in the rules. The purpose of this section is to explain why solely relying on volunteer action, or solely relying on ORC control would not be effective, and that rules are therefore required.
P335.49	Barrie Wills	In relation to [Section 9.5][for example, Chilean needle grass, moth plant), wild Russell lupin and wilding conifers] Shift bracket??	Shift closing bracket after 'moth plant'.	Amendments to Plan	Reject	This is not an error.
P335.50	Barrie Wills	In relation to [Appendix 1] No 'e' in Hawthorne.	Correct spelling of Hawthorn.	Amendments to Plan	Accept	This corrects a minor error.
P335.8	Barrie Wills	What act?	Specify the 'Acts' referred to in section 4.3 and 5.1	Amendments to Plan	Reject	These references are to the Biosecurity Act 1993, which is referred to in full in Section 1.1.
P335.9	Barrie Wills	In relation to [sections 4.3 and 4.4] [These organisms have been categorised as 'Organisms of Interest' (OOI)] [ For the most up to date list of Unwanted Organisms, visit the MPI website] [The National Pest Plant Accord (NPPA) currently targets 113 plant species, all of which are declared Unwated Organisms. NPPA is a cooperative agreement between the Nursery and Garden Industry Association, regional councils and Government departements] Some repetition with page 8.	Some repetition with page 8.	Amendments to Plan	Reject	No amendments are recommended to Sections 4.3 and 4.4 are they provide clear explanations of Organisms of Interest and Unwanted Organisms.
P341.3	R L Wilson & R T Redneck	Put all land on progressive containment programmes and enforce it. Not as it appears no where councils, DOC, cycle trails, Transit NZ, all public land, govt depts SOE's, those that can't be bothered or plead poverty appear to be exempt. If all land owners, land managers were to deal with the worst 10% of their weeds each year in 20 years massive inroads to this problem could be made. Transit NZ's nationwide weed and pest propagation network is now being duplicated by the cycle trails. I fail to see how anyone will get an recreational pleasure walking or cycling down a tunnel of broom, gorse and buddleia dodging rabbits, rabbit holes and other pests. I believe we should sort out our own environment before we attempt to save the world from the myth of global warming [refer poem: global warning].	Include all land for progressive containment and enforce it.	Amendments to Plan	Reject	Where pest species in the Plan are not included within a progressive containment programme, this is because the alternative programme proposed generally has a higher risk-adjusted net benefit. The submitter's comments regarding global warming are out of scope.
S016.8	Catherine Brigham	Leave deer, wallabies, tahr, goats, wild horses alone! I don't want to be associated with all this killing.	Remove deer, wallabies, tahr, goats, wild horses from the Plan.	Amendments to Plan	Reject	Feral deer and feral goats are included in the Plan as site-led pests only. Site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. No region wide eradication is recommended. Wild horses are not included in the Plan. Wallabies are a significant pest in Otago.
P201.1	Dunedin City Council	Biosecurity Strategy: The DCC supports the Biosecurity Strategy and recommends only one minor amendment. The table at 4.2 (page 32) should be amended to reflect the current status of discussions about which agency will lead the landscape scale urban linkages plan to support Predator Free Dunedin. The text in the first column of the table ("Work in partnership with the Dunedin City Council on its landscape scale urban linkages plan to support Predator Free Dunedin") implies the DCC is the lead agency on this work. However, at the August 2018 meeting of Te Ao Tūroa Partnership the DCC noted there was no agreement that the DCC will lead the urban linkage component of the Predator Free Dunedin initiative. There will be a discussion about the lead agency after the Urban Linkage Working Group (made up of representatives from the DCC, DOC and Predator Free Dunedin) presents its project plan in early-2019.	The Proposed Biosecurity Strategy is amended to reflect updates on the agency responsible for leading the landscape scale urban linkages plan to support Predator Free Dunedin.	Amendments to Strategy	Reject	We heard from the submitter at the hearing. It was clarified that the DCC is in fact the lead agency, employing two people to act as delivery partners within Predator Free Dunedin. This clarification negates the relief originally sought and so the submission is rejected.
P211.12	John Parker	Table in section 4 of the proposed Biosecurity Strategy I request an amendment to the timetable for the key project action on developing guidance on how ORC can support groups, such as Save the Otago Peninsula, with site-led initiatives. The time frame should be 6 months, not 12months. "Developing guidance" is not very ambitious, I suggest that ORC has as a more practical key project action.	Request Biosecurity Strategy is amended to reduce timeframe the key project action on developing guidance on how ORC can support groups, such as Save the Otago Peninsula, with site-led initiatives, from 12 months (as proposed) to 6 months.	Amendments to Strategy	Reject	The Panel considers up to 12 months is an appropriate timeframe to develop this guidance.
P286.12	New Zealand Transport Agency	The Transport Agency is not specified at any point of the Biosecurity Strategy. Road verges traverse the landscape and are important areas to recognise when considering biosecurity. It is recommended that the Transport Agency is included in a number of sections that are indicated in the following comments.	Inclusion of the Transport Agency throughout the Biosecurity Strategy.	Amendments to Strategy	Accept in part	This submission is accepted in part. See responses to the submitter's further submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P286.13	New Zealand Transport Agency	The role of other agencies - diagram: It is assumed the Transport Agency is included under 'individuals, groups, territorial authorities and other organisations'. Because there is often confusion regarding the Crown and Crown entities (the Transport Agency being a crown entity), it is suggested that where the Transport Agency and other roading/transport authorities sit be clarified.	The Biosecurity Strategy is amended to clarify where roading and other transport controlling authorities sit in the diagram.	Amendments to Strategy	Reject	The purpose of the diagram is to provide a simple visual example of the organisations that are involved in biosecurity at different scales and is not an exhaustive list of all organisations that have a role.
P286.14	New Zealand Transport Agency	The role of other agencies. Recommended that the Transport Agency is included in those agencies described with words similar to those below: "The Transport Agency is a statutory entity and a Crown agent under Section 7 and Schedule 1 of the Crown Entities Act 2004 and therefore a Crown entity. As a Crown entity, the Transport Agency is subject to provisions applicable to land occupier for the purposes of obligations for pest control on road reserves or verges in terms of the Act (as described in Part Two of this plan).	The Biosecurity Strategy is amended to include the Transport Agency similar to KiwiRail.	Amendments to Strategy	Accept in part	It is recommended to add NZTA to Section 2.3 regarding the role of other agencies, but to simplify the suggested addition.
P286.15	New Zealand Transport Agency	Action 3.2.1: The Transport Agency seeks clarity around monitoring and surveillance i.e. will ORC be including road verges in their monitoring and surveillance programme?	Clarity regarding road verges monitoring and surveillance.	Amendments to Strategy	Note	ORC undertakes monitoring and surveillance of road boundaries.
P286.16	New Zealand Transport Agency	Section 3.3 Integrated and collaborative action: Working with all parties at all levels. The Lindis Conservation Group (Transport Agency contractors are actively working with this group) are actively trying to contain the invasive sweet brier in the Lindis Pass Scenic Reserve. The Pest Management Plan enables ORC to request that the Transport Agency eliminates sweet brier on their land. While there is no requirement for the Transport Agency to undertake control or elimination of this pest plant, the Conservation Group, or ORC may request the Transport Agency eliminate it on their land, under Action 3.3.2.	Adjust wording to reinforce that working together achieves better outcomes.	Amendments to Strategy	Reject	It is not clear what amendments NZTA are seeking to respond to their relief. NZTA can undertake sweet brier control at any time and do not require ORC approval or notice to do this.
P286.17	New Zealand Transport Agency	Section 3.4 relates to collaborative and coordinated control as part of site-led programmes in the Plan. The Transport Agency may be impacted by these as part of the West Harbour - Mt Cargill site-led area. This area encompasses SH1 from Dunedin to Waitati, and all of SH88 to Port Chalmers. The NZTA will be required to support the management of banana passionfruit, Chilean flame creeper, Darwin's Barberry, Sycamore, Tradescantia, Bennett's Wallaby, feral cat, feral deer, feral goat, feral pig, mustelids, stoats, ferrets and weasels and possums.	ORC help provide an indication of distribution and abundance of the species listed. Any control of these species would need to be done in a coordinated fashion. Include the Transport Agency on the biosecurity technical working group for this reason.	Amendments to Strategy	Accept in part	See response to submission P286.2.
P286.18	New Zealand Transport Agency	Action 3.3.2: The Transport Agency supports the action to work collaboratively and in partnership wishes to work cooperatively with ORC and others and wishes to be in the biosecurity technical working group.	The Transport Agency be included in the biosecurity technical working group.	Amendments to Strategy	Accept	See response to submission P286.2.
P286.19	New Zealand Transport Agency	Section 4.2 Proactive biosecurity management: The Transport Agency supports the establishment of a biosecurity technical working group and request the Transport Agency to be a part of this group. The Transport Agency see being part of the group as key to a collaborative, more effective approach to the management of pests and a way to enable the different parties, including the Transport Agency, to be informed of any new species and be proactive in their response to new threats.	The Transport Agency be included in the biosecurity technical working group.	Amendments to Strategy	Accept	See response to submission P286.2.
P286.2	New Zealand Transport Agency	The Transport Agency supports the establishment of a biosecurity technical working group and request the Transport Agency to be part of this group. The Transport Agency sees being part of the group as being key to a collaborative, more effective approach to the management of pests and a way to enable the different parties, including the Transport Agency, to be informed of any new species and be proactive in their response to new threats.	The Transport Agency be part of the biosecurity technical working group that ORC is establishing.	Amendments to strategy	Accept	The Panel welcomes NZTA's involvement in a biosecurity technical working group.
P294.15	Save The Otago Peninsula	Action 3.2.4 In STOP's opinion allowing a year to prepare an Operational Plan is too long. STOP requests that the Operational Plan is prepared within 6 months of the new Plan and would be willing to contribute ideas for the site-led programmes on Otago Peninsula.	Timeframe for Operational Plan is amended from 1 year (as proposed) to 6 months.	Amendments to Strategy	Reject	Section 100B of the Biosecurity Act requires the Operational Plan to be prepared within 3 months. The Operational Plan sets out how ORC will administer the Plan and Strategy actions over the coming 12 months, and ORC will update and report on the Plan outcomes on an annual basis.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P294.16	Save The Otago Peninsula	Action 3.3.4: The activities listed to empower individuals and communities to control harmful organisms do not match the statement made about the ORC taking a lead role in supporting community groups. STOP has worked for 20 years on pest plant control and occasionally we need to have a knowledgeable staff person from ORC out on the job with us. That's the place where effective training and education takes place and STOP members would be keen to learn from a professional. Putting information on the web site, distributing brochures and expecting community groups to apply for funds from the greatly oversubscribed EcoFund to finance some of their activities are simply not enough.	Action 3.3.4 is amended to provide greater on-site professional support to volunteer pest control efforts.	Amendments to Strategy	Reject	This is an implementation matter. How ORC intends to support the Dunedin site-led areas is clearly set out in the Strategy Actions. In particular: Following the establishment of the above plan, establish a plan of action for ORC's role in the delivery of the plan outcomes. This shall set out ORC's role in: undertaking control works; monitoring of key species; providing guidance on predator prey relationships and how these should be addressed when undertaking control works (e.g. mustelid / rabbit pest control relationship); leading some of these activities where needed; and directly undertaking control where there are barriers to landowner participation.
P294.17	Save The Otago Peninsula	3.4 Otago Peninsula: correct spelling is Harington Point Road	3.4 Otago Peninsula is amended to 'Harington Point Road'	Amendments to Strategy	Accept	This amendment corrects an error.
P294.19	Save The Otago Peninsula	4.1 STOP requests two amendments to the timetable for the key project action on developing guidance on how ORC can support community groups with site-led initiatives. 1) The time frame should be 6 months, not 12 months. 2) We suggest that ORC has as a key project, action which is more specific, such as "Work with groups with smaller site-led initiatives to agree on priorities for action and identify the ways in which ORC can be involved".	4.1 is amended to reduce the timeframe from 1 year (as proposed) to 6 months, and a new, more specific action is adopted such as "Work with groups with smaller site-led initiatives to agree on priorities for action and identify the ways in which ORC can be involved".	Amendments to Strategy	Reject in part	Section 100B of the Biosecurity Act requires the Operational Plan to be prepared within 3 months. The Operational Plan sets out how ORC will administer the Plan and Strategy actions over the coming 12 months, and ORC will update and report on the Plan outcomes on an annual basis. Section 4.2 of the Strategy is recommended to be amended to make this clear. The requested action is similar to the priority project already identified on Page 32 and no further amendments are recommended.
P295.8	Landscape Connections Trust Halo Project	LCT believe that the timeframes proposed in the Landscape Scale and Site Scale section of the table presented on page 32 of the Proposed Biosecurity Strategy are inappropriate and do not align with PFD's work programme, milestones and deadlines. The following amendments are sought, and without these amendments we feel that the ORC may fail to meet the objectives of the PRPMP in full and on time:	The timeframes for Landscape Scale and Site Scale projects within the Biosecurity Strategy are reduced as follows: 1. "Contribute to the development of the Predator Free Dunedin 2050 'whole of site' management plan/s" is reduced from 12 months (as proposed) to 6 months. 2. "Following the establishment of the above plan, establish a plan of action for ORC's role in the delivery of the plan outcomes..." is reduced from 'within 18 months (as proposed) to within 12 months. 3. "Develop guidance on how ORC can support groups with smaller site-led initiatives to manage harmful organisms" is reduced from 12 months (as proposed) to 6 months.	Amendments to Strategy	Accept in part	The Panel is satisfied that the timeframes requested by the submitter in relation to the first two projects are appropriate and it is recommended these timeframes are reduced to 6 months and 12 months respectively. However, the Panel accepts the staff recommendation in relation to the 3rd project that this timeframe remains unchanged.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.8	Predator Free Dunedin	PFD believe that the timeframes proposed in the Landscape Scale and Site Scale section of the table presented on page 32 of the Proposed Biosecurity Strategy are inappropriate and do not align with PFD's work programme, milestones and deadlines. The following amendments are sought, and without these amendments we feel that the ORC may fail to meet the objectives of the PRPMP in full and on time:	The timeframes for Landscape Scale and Site Scale projects within the Biosecurity Strategy are reduced as follows: 1. "Contribute to the development of the Predator Free Dunedin 2050 'whole of site' management plan/s" is reduced from 12 months (as proposed) to 6 months. 2. "Following the establishment of the above plan, establish a plan of action for ORC's role in the delivery of the plan outcomes..." is reduced from 'within 18 months (as proposed) to within 12 months. 3. "Develop guidance on how ORC can support groups with smaller site-led initiatives to manage harmful organisms" is reduced from 12 months (as proposed) to 6 months.	Amendments to Strategy	Accept in part	The Panel is satisfied that the timeframes requested by the submitter in relation to the first two projects are appropriate and it is recommended these timeframes are reduced to 6 months and 12 months respectively. However, the Panel accepts the staff recommendation in relation to the 3rd project that this timeframe remains unchanged.
S012.7	Federated Farmers of New Zealand	d.The 'Economy' section on page 10 goes into a lot of detail about tourism. A similar amount of information needs to be provided on agriculture, rather than a vague 'major source of revenue'. References are also lacking in this section.	Amend the Economy section of the Strategy to provide more information about agriculture and add references.	Amendments to Strategy	Accept	This section is recommended to be amended to provide more information about agriculture and add references.
S012.8	Federated Farmers of New Zealand	e.Page 13 discusses the role of other agencies. Other government agencies also have roles in biosecurity. For example, Marine Protection Rules administered by Maritime New Zealand regulate the use of ships' ballast waters.	Amend the Role of Other Agencies section in the Strategy to discuss the role of other agencies including Maritime New Zealand.	Amendments to Strategy	Reject	The role of other agencies in Section 2.3 and the associated diagram is not an exhaustive list of all agencies involved in biosecurity, but is intended to provide a snapshot of some of the key agencies involved and the different levels at which they operate.
S013.1	Kāi Tahu ki Otago	Chapter 2.1 Biosecurity Issues in Otago (p.9) - Takata Whenua values - We submit that the Kāi Tahu Natural Resource Management Plan 2005 should be a prominent guiding document in regards to partnership and consultation – with the level of consultation preferably being consistent with the highest level as outlined in Section 11.	Amend paragraph 3 as follows: The Kāi Tahu Natural Resource Management Plan 2005 contains a number of issues, objectives and policies regarding the control of biosecurity threats. <u>It also informs Kāi Tahu expectations regarding the nature of participation and consultation in natural resource management matters.</u>	Amendments to Strategy	Accept	The requested amendment provides clarification.
S013.10	Kāi Tahu ki Otago	Chapter 3.3.3 - Support and work in partnership with Kāi Tahu (p.21) - Kāi Tahu interests in mahika kai, wetlands and supporting ecosystems were key elements of the Ngai Tahu Claims Settlement Act, thus Kāi Tahu interests have already been established. Kāi Tahu as treaty partners request regular and effective engagement on biosecurity issues and initiatives.	Amend text as follows: 'Engage with Kāi Tahu regularly on biosecurity issues to identify where Kāi Tahu may have <u>any further interests</u> in biosecurity initiatives and how they wish to be involved.'	Amendments to Strategy	Reject	This action relates to ORC's commitment to engage with Kāi Tahu, specifically on biosecurity works Kāi Tahu may have an interest in, and should therefore remain unchanged.
S013.15	Kāi Tahu ki Otago	Chapter 4.2 – Priority projects for the first five years of the strategy: 'Proactive Biosecurity Management' (p.29) - Differentiate between those Kāi Tahu rūnaka who have manawhenua in the regions covered by this strategy, and the wider Kāi Tahu iwi and hapū structures.	Reference here in Row 1 to Kāi Tahu under 'Partner/support' column should be amended to read ' <u>Kāi Tahu ki Otago</u> ' preferably followed by listing the four Otago rūnaka being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.	Amendments to Strategy	Accept in part	This amendment provides clarification.
S013.16	Kāi Tahu ki Otago	Chapter 4.2 – Priority projects for the first five years of the strategy: 'Proactive Biosecurity Management' (p.30) - Te Rūnanga o Ngāi Tahu should be included as this is an iwi governance group and therefore a treaty partner who should be involved in formulating national initiatives alongside governing authorities.	In Row 3, under the 'Partner/support' column insert <u>Te Rūnanga o Ngāi Tahu</u>	Amendments to Strategy	Accept	This amendment provides clarification.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S013.17	Kāi Tahu ki Otago	Chapter 4.2 – Priority projects for the first five years of the strategy: ‘Integrated and collaborative action’ (p.31) - Differentiate between those Kāi Tahu rūnaka who have manawhenua in the regions covered by this strategy, and the wider Kāi Tahu iwi and hapū structures.	Reference in Row 4 to ‘Kāi Tahu’ under ‘Partner/support’ column should be amended to read ‘ <u>Kāi Tahu ki Otago</u> ’ preferably followed by listing the four Otago rūnaka being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.	Amendments to Strategy	Accept in part	This amendment provides clarification.
S013.18	Kāi Tahu ki Otago	Chapter 4.2 – Priority projects for the first five years of the strategy: ‘Integrated and collaborative action’ (p.31) - Te Rūnanga o Ngāi Tahu should be included as one of the co-leaders of the development of national or multi regional pest management responses given their overview of tribal interests within the Kāi Tahu iwi takiwā as well as representing treaty partner interests.	In Row 5, under the ‘Partner/support’ column insert <u>Te Rūnanga o Ngāi Tahu</u>	Amendments to Strategy	Accept	This amendment provides clarification.
S013.19	Kāi Tahu ki Otago	Chapter 4.2 – Priority projects for the first five years of the strategy: ‘Landscape scale and site scale (p.31-32) - Provide for Kāi Tahu Rūnaka ki Otago engagement in the formulation and implementation of ‘whole of site’ management plans relating to their ancestral landscapes	In Row 1, under the ‘Partner/support’ column insert <u>Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga</u>	Amendments to Strategy	Reject	This key project/action relates to the Dunedin site-led areas only.
S013.2	Kāi Tahu ki Otago	Chapter 2.1 - Takata whenua values (p.9) - The use of ‘takata whenua’ in this context is not considered to be appropriate as ‘takata whenua’ is a generic term which does not reflect the mana whenua status of Kāi Tahu Rūnaka ki Otago in the Otago region.	References to ‘takata whenua’ should be replaced in all instances by <u>mana whenua</u> .	Amendments to Strategy	Accept	This amendment provides clarification.
S013.3	Kāi Tahu ki Otago	Chapter 2.1 - Takata whenua values (p.9) - Kāi Tahu relationships with mahika kai are a cornerstone of cultural identity, and whilst these associations have often been diminished, Kāi Tahu aspirations are that the restoration, protection and enhancement of the cultural practices of gathering, preserving and conserving mahika kai is widely understood and enabled.	Amend as follows: Harmful organisms can adversely affect the values of Kāi Tahu and rūnaka. Harmful <u>terrestrial and aquatic</u> species can affect mahika kai and Wai Māori. <u>Kāi Tahu identify the maintenance and enhancement of associations with mahika kai as primary means to realise intergenerational knowledge transfer and thus strengthen cultural identity and well being.</u>	Amendments to Strategy	Accept	Including the addition of ‘terrestrial and aquatic’ provides clarification. The additional amendments are recommended to be modified so that it is simpler to read.
S013.4	Kāi Tahu ki Otago	Chapter 2.1 - Landscape, amenity and recreation (p.11) - These proposed changes acknowledge the wider significance of landscapes as places that contribute to a community’s sense of identity, place and well-being. The use of the term ‘cultural landscape’ reflects the contemporary and historical associations of residents and their interactions with such landscapes over time. As such this concept is broader than the current ‘visual amenity’.	Amend paragraph 1 as follows: This can impact <u>both tangible and intangible</u> values of our cultural landscapes, adversely affecting <u>visual</u> amenity values for Otago’s residents and visitors.	Amendments to Strategy	Reject in part	The Panel agrees that that cultural landscapes are an important consideration. An alternative amendment is recommended to make this clear without confusing the meaning of the rest of the paragraph.
S013.5	Kāi Tahu ki Otago	Chapter 3.1 Proactive biosecurity management: addressing issues before they become significant - This section should identify pathway linkages that reflect and include the Kāi Tahu priorities as outlined and specifically mentioned in the Kāi Tahu Natural Resource Management Plan 2005. Identification of linkages will maintain consistency between ORC and Kāi Tahu policy documents and strategic objectives.	Identify pathway linkages that reflect and include the Kāi Tahu priorities as outlined and specifically mentioned in the Kāi Tahu Natural Resource Management Plan 2005.	Amendments to Strategy	Reject	The Panel notes that further clarification identifying the specific amendments were sought from the submitter. The submitter did not present its submission at the Hearing. The Panel notes the requested amendment.
S013.7	Kāi Tahu ki Otago	Chapter 3.3.3 - Support and work in partnership with Kāi Tahu (p.21) - Change the words from Kāi Tahu to Kāi Tahu Runaka ki Otago. This terminology is more representative of the manawhenua of this region.	Change the words from Kāi Tahu to <u>Kāi Tahu Runaka ki Otago</u>	Amendments to Strategy	Reject	The Panel notes that further clarification identifying the specific amendments were sought from the submitter. The submitter did not present its submission at the Hearing. The Panel notes the requested amendment.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S013.9	Kāi Tahu ki Otago	Chapter 3.3.3 - Support and work in partnership with Kāi Tahu (p.21) - Biodiversity issues impact on Kāi Tahu beyond just cultural values. Partnership with Kāi Tahu ki Otago runaka in biosecurity initiatives could also initiate positive environmental, social and economic outcomes thus adress a wider spectrum of values.	Amend text as follows: 'Partner with Kāi Tahu on biosecurity initiatives to address issues that impact on <del>cultural</del> values of significance to Kāi Tahu'.	Amendments to Strategy	Accept	This clarifies the action.
P068.1	Hamish MacKenzie	Wallabies. Support ORC in trying to contain these unnecessary pests.	Extra funding must be sought and given if we are going to eradicate wallabies out of Otago.	Bennett's Wallaby	Note	ORC currently spends up to approximately \$300,000 pa on wallaby eradication and will continue to work towards eradication of wallabies in Otago.
P110.1	Morgan Trotter	I support the inclusion of wallaby as a pest animal and think that more resources should be applied to eradicate and then prevent further incursions in Otago. We own a native forest and tussock block behind Hampden set aside to encourage regeneration and biodiversity values. If wallabies were to establish in this rugged country they would be very difficult to control and probably impossible to eradicate. Also I have seen the damage high wallaby numbers can do to open grassland and grey scrub vegetation in South Canterbury - their impact on Otago tussock lands and on stock carrying capacity would be significant.	Support the inclusion of wallabies in the Plan.	Bennett's Wallaby	Accept	The submitter supports the inclusion of Bennett's wallaby in the Plan.
P182.3	Federated Farmers of New Zealand	FFNZ supports the aim of eradicating Bennett's wallaby. 8.The collaborative approach to eradicating this pest is necessary and strongly supported. Given the ability of wallabies to disperse widely, the need for coordinated control is vital to ensure success.  9.Maintaining a strong working relationship with Environment Canterbury, research institutions and all landowners will ensure that the most effective methods are utilised, thereby maximising the use of rate payer's money.  10.The support from Council for land occupiers to destroy wallabies will be required to ensure a successful eradication campaign, as not everybody has the equipment or fortitude to destroy larger mammalian pests.	Support the inclusion of Bennett's wallaby in the Plan and request more coordinated control.	Bennett's Wallaby	Note	The Panel notes that ORC staff work closely with Environment Canterbury on Bennett's wallaby control and supports land occupiers in destroying wallabies if these are sighted, but not destroyed by the land occupiers themselves.
P266.4	Lindis Pass Conservation Group Inc	6.2.2. Pests to be managed by elimination. Bennett's Wallaby. Our submission is that Bennett's Wallaby should be eliminated wherever it is found. It should never be allowed to establish in the Lindis Pass Scenic Reserve and on the adjacent conservation land - including on Otago land which will through Tenure Review be added to the public conservation estate in the near future.	1. We support all moves to eliminate Bennett's Wallaby wherever it is found. 2. ORC to push back on this pest animal to prevent its establishment on the dry ranges south of the Waitaki River.	Bennett's Wallaby	Note	The submitter's request to push back on the dry ranges south of the Waitaki River is noted and this area is a key area of focus for control.
P285.7	Ernslaw One Ltd.	Wallabies - we support the proposal as written.	Retain rule as written.	Bennett's Wallaby	Accept	The submitter supports the inclusion of Bennett's wallaby in the Plan.
P286.6	New Zealand Transport Agency	Section 6.2 Pests to be managed under eradication programmes: The Transport Agency will be required to eradicate all pests on its land by 2028. This is governed by Objective 6.2.3. The Transport Agency seeks clarification regarding the eradication programme and responsibility for incursion control. From the proposed plan it is read that the Council is responsible for the control of eradication species including spiny broom (i.e. the Transport Agency is not responsible).	Request acknowledgement that along the narrow state highway road corridor, it is unsafe to shoot to eradicate Bennett's Wallaby. The Transport Agency's main focus will be on reporting sightings and signs.	Bennett's Wallaby	Note	The Panel notes that ORC staff acknowledge that NZTA are likely to report wallaby sightings in the road corridor to ORC, rather than undertake control in these areas due to health and safety concerns. ORC will follow up on any sighting by NZTA and undertake control as necessary.
P113.1	Alfred John Webb	6.5.4 Otago Peninsula Site led programme. I generally support this plan. The priority pest for our property and many others is Banana Passionfruit. Every year we weed out every plant before they have ripe fruit from our 5ha but reinvasion from other properties some of them have areas of passionfruit so big the owners will not be able to control it without help from ORC. Rats should also be included for sustainable control as they consume a vast amount of our small and medium size biodiversity. Rat traps can easily be added to trapping stations set up for other pests on the list. The invasive plant Umbrella sedge (Cyprus eragrostis) should be added to 6.5.4.b. This robust sedge has a high tolerance to herbicide and is spread along water tables and roadsides by mechanical flail mowers. From there it is a threat to any wetland or grassland area. In 2004 P.N. Johnson found it at 7 sites on Otago Peninsula.	Retain section 6.5.4 as notified, with the addition of rats to 6.5.4.a and the addition of Umbrella Sedge (Cyprus Eragrostis) to 6.5.4.b.	Dunedin Site-led Programmes	Accept in part	See response to submission P291.3 regarding the sustained control of rats. The Panel considers there is not enough information at present regarding the issues and impacts of umbrella sedge to include it within the Dunedin site-led programmes.
P126.4	Logan Cowdell	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P126.5	Logan Cowdell	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P126.6	Logan Cowdell	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P126.7	Logan Cowdell	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P128.4	Rebecca Bell	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P128.5	Rebecca Bell	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P128.6	Rebecca Bell	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P128.7	Rebecca Bell	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P130.4	Rafferty Parker	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P130.5	Rafferty Parker	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P130.6	Rafferty Parker	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P130.7	Rafferty Parker	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P132.4	Jesse Keable	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P132.5	Jesse Keable	I don't 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.	Opposes site-led programme.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P132.7	Jesse Keable	I don't 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.	Opposes site-led programme.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P132.8	Jesse Keable	I don't support the site-led programme for Quarantine and Goat Islands and don't support the objectives, principle measures and rules set out in table 28 to accomplish this.	Opposes site-led programme.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P133.4	Monika Divers-Sidor	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P133.5	Monika Divers-Sidor	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P133.6	Monika Divers-Sidor	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P133.7	Monika Divers-Sidor	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P134 .3	Charlene Gell	I support the site-led programmes for the Otago Peninsula, West Harbour - Mt. Cargill area, and Quarantine and Goat Island areas, with the exception that I do not support the inclusion of cats or hedgehogs in this programme.	Support site-led programmes with the exception that feral cats and hedgehogs should be excluded.	Dunedin Site-led Programmes	Accept in part	The submitter supports the site-led programmes with the exception of feral cats and hedgehogs. Submissions on feral cats and hedgehogs are addressed separately.
P135.4	Noeline Bourke	I do not 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.	Opposes the inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P135.7	Noeline Bourke	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P136.4	Marty Roberts	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P136.5	Marty Roberts	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P136.6	Marty Roberts	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P136.7	Marty Roberts	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P137.4	Dell McLeod	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P137.5	Dell McLeod	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P137.6	Dell McLeod	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P137.7	Dell McLeod	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P138.4	Jennifer Thomas	I support the inclusion of 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 mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control.	Support for inclusion of mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P138.5	Jennifer Thomas	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.	Support for site-led programme on Otago Peninsula.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for the Otago Peninsula.
P138.6	Jennifer Thomas	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.	Support for site-led programme for West Harbour - Mt. Cargill.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for West Harbour - Mt. Cargill.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P138.7	Jennifer Thomas	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P139.4	Davina Hopgood	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests. [it is noted that this is likely submitted in error - see submission points 139.5-8].	Dunedin Site-led Programmes	Accept	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P141.4	Josh Norton	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P141.5	Josh Norton	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P141.6	Josh Norton	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P141.7	Josh Norton	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P142.4	Craig Freeman	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P142.5	Craig Freeman	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P142.6	Craig Freeman	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P142.7	Craig Freeman	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P143.4	Anna Clark	I support the inclusion of mice and rabbits/hares in addition to 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.	Include mice, rabbits and hares in addition to hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Reject	It is not recommended to include rabbits in the site-led programme as the Plan contains regionwide rules for rabbits. Mice and hares are also not recommended to be added to the site-led programmes. Hares are in the Operative Plan. However, ORC have had very few complaints regarding hares in the last 10 years, and can provide advice to landowners as required without the need to regulate. Mice are identified as an Organism of Interest and ORC staff provide advice to people regarding mouse control as required.
P143.5	Anna Clark	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P143.6	Anna Clark	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P143.7	Anna Clark	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P144.4	Jared Oliver	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P144.5	Jared Oliver	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P144.6	Jared Oliver	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P144.7	Jared Oliver	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P146.4	Karin Johnsson	I support the inclusion of hedgehogs, mustelids, 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.	Support the inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P146.5	Karin Johnsson	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P146.6	Karin Johnsson	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P146.7	Karin Johnsson	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P147.3	Tina Kapohe	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. [it is noted that this submission is likely in error - see submission point 147.4]	Support for site-led programmes on the Otago Peninsula.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P148.5	Rusty Knight	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P148.6	Rusty Knight	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P148.7	Rusty Knight	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P148.8	Rusty Knight	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P149.4	Matthew Peppercorn	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P149.5	Matthew Peppercorn	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P149.6	Matthew Peppercorn	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P149.7	Matthew Peppercorn	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P150.4	Julia Stewart	I DO NOT support the inclusion of hedgehogs, mustelids and rats as site led pests. Would you explain how the more civilized countries in Eu for example facilitate their conservation projects without mass killing/poisoning animals?	Opposes inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Reject	The species listed as pests in the site-led programmes cause economic, cultural, social, recreational and/or environmental effects and the effects of pest species in the site-led programmes is described in Table 25 in the Plan.
P150.6	Julia Stewart	I DO NOT 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.	Opposes site-led programme for West Harbour - Mt. Cargill.	Dunedin Site-led Programmes	Reject	See response to submission P150.4. It is assumed the submitter's request regarding pest cats is in error.
P150.7	Julia Stewart	I DO NOT 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.	Opposes site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P151.4	Martin Broadbent	I DO NOT support the inclusion of hedgehogs, mustelids or rats as site led pests. All these species DO NOT have significant impact on our native biodiversity and DO NOT need to be controlled, especially in areas with significant native ecosystems. Council should NOT accept the list of animal pests especially the inclusion of hedgehogs, mustelids and rats as site led pests. As mentioned above I would not like possums defined as a pest for sustained control.	Opposes inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P151.6	Martin Broadbent	I do not support the site-led programme for West Harbour - Mt. Cargill and do not 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 NOT like Council to include pest cats in Plan Rule 6.5.5.1.	Opposes site-led programme for West Harbour - Mt. Cargill.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P151.7	Martin Broadbent	I DO NOT support the site-led programme for Quarantine and Goat Islands and DO NOT support the objectives, principle measures OR rules set out in table 28 to accomplish this.	Opposes site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Reject	See response to submission P150.4.
P152.4	Rosalie Goldsworthy	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P152.5	Rosalie Goldsworthy	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P152.6	Rosalie Goldsworthy	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P152.7	Rosalie Goldsworthy	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P153.4	Fiona Peoples	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P153.5	Fiona Peoples	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P153.6	Fiona Peoples	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P153.7	Fiona Peoples	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P154.4	Sarah McArthur	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P157.4	Dylan Robertson	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P157.5	Dylan Robertson	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P157.6	Dylan Robertson	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P157.7	Dylan Robertson	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P158.4	Lucy Bell	I support the inclusion of, 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 mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control.	Support for inclusion of mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P158.5	Lucy Bell	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.	Support for site-led programme on Otago Peninsula.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Otago Peninsula.
P158.6	Lucy Bell	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.	Support for site-led programme for West Harbour - Mt. Cargill.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for West Harbour - Mt. Cargill.
P159.4	Shaun Templeton	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P159.5	Shaun Templeton	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P159.6	Shaun Templeton	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P159.7	Shaun Templeton	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P160.4	Fiona Peat	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P160.5	Fiona Peat	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P160.6	Fiona Peat	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P160.7	Fiona Peat	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P161.4	Bonnie Wilkins	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P161.5	Bonnie Wilkins	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P161.6	Bonnie Wilkins	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P161.7	Bonnie Wilkins	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P174.6	Helen Clarke	For proposal 6.4 I would particularly like to see Mustelids, feral cats, hedgehogs moved from site led control to sustained control. These species are big predators particularly of ground dwelling native species and we should be instigating more control of them.	Categorise mustelids, feral cats, hedgehogs from site led control to sustained control.	Dunedin Site-led Programmes	Reject	ORC has not carried out or been involved in the control of feral cats, hedgehogs or mustelids to date and staff consider a region wide control programme is not appropriate, however new site led areas may be added to the Plan over time where these meet the criteria in Appendix 2 of the Strategy.
P174.7	Helen Clarke	I support the Site-led programmes on the Otago Peninsula West Harbour -Mt Cargill and Quarantine and Goat Islands. As a former Otago Peninsula resident I know how special those areas are, and, how hard the local communities have worked to get to this stage.	Support for site-led programmes.	Dunedin Site-led Programmes	Accept	The submitter supports the Dunedin site-led programmes.
P183.5	Routeburn Dart Wildlife Trust	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P185.4	Nicola Richards	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P185.5	Nicola Richards	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P185.6	Nicola Richards	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P185.7	Nicola Richards	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P189.4	Diana Stiven	I support the inclusion of 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 mustelids and rats as site led pests. As mentioned above I would like possums defined as a pest for sustained control.	Support inclusion of mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P189.5	Diana Stiven	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.	Support for site-led programme for the Otago Peninsula.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Otago Peninsula.
P189.6	Diana Stiven	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.	Support for site-led programme for West Harbour - Mt. Cargill.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for West Harbour - Mt. Cargill.
P189.7	Diana Stiven	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P199.1	Kim Clifton	1. There is no evidence that Mount Cargill - is in need of pest management. 3. The birdlife is abundant in Mount Cargill - I know I live there	No evidence of need for site-led programme for Mount Cargill.	Dunedin Site-led Programmes	Reject	The reasons for the West Harbour-Mt. Cargill sit-led programme are set out in Section 6.5.2 of the Plan and Section 3.4 of the Strategy.
P201.11	Dunedin City Council	The DCC supports the inclusion of site-led programmes to manage pests on the Otago Peninsula and West Harbour–Mt. Cargill area. The site-led programmes support the Predator Free Dunedin initiative.	Support site-led programmes on the Otago Peninsula and West Harbour-Mt. Cargill area	Dunedin Site-led Programmes	Accept	The submitter supports the Dunedin site-led programmes.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P209.2	Mike Hazel	Table 24 - No pest plants included for Goat/Quarantine Islands. Why not? Quarantine volunteers work on plant pests regularly. As is mentioned, these islands are a bridge across the Harbour for pest plants.	Add Banana Passionfruit, Darwin's barberry and Chilean flame creeper as pest plants managed under the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P211.1	John Parker	Objective 6.5 I support the site-led programme for the Otago Peninsula and the inclusion of all the named plant species.	Support the site-led programme for the Otago Peninsula.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Otago Peninsula.
P211.10	John Parker	I would like boxthorn added to the list for progressive containment, also Cotoneaster.	Added Boxthorn and Cotoneaster as progressive containment pests for site-led programmes for the Otago Peninsula.	Dunedin Site-led Programmes	Reject	See response to submission P289.9.
P211.2	John Parker	Objective 6.5.4.a I support a) preclude establishment of feral deer, feral goats, feral pigs and Bennett's wallaby suggest thar is included	Request addition of Tahr as an exclusion animal for the site-led programme for the Otago Peninsula.	Dunedin Site-led Programmes	Accept	See the response to submission P295.13.
P211.4	John Parker	Objective 6.5.4.c "Sustainable control" of pest animals implies that ORC would like these pest animals present on the Peninsula forever. Was the term "sustained" intended?	No specific relief sought.	Dunedin Site-led Programmes	Reject	Sustained control is a term defined in the NPD and is defined in Section 5.4 of the Plan as 'to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties'.
P211.5	John Parker	Feral cats, hegehogs and Mustelids are all predators that have an impact on native fauna and I would like ORC to manage these pests by progressive containment.	Manage feral cats, hedgehogs and mustelids through progressive containment programmes.	Dunedin Site-led Programmes	Accept in part	Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. The progressive containment of feral cats and hedgehogs is not recommended.
P211.8	John Parker	Rule 6.5.4.1 Rats should also be included in this section. I acknowledge that rats are widespread, however some residents are trapping and intensive rat trapping is undertaken at certain sites of high biodiversity values. I would like to see rats included for sustained control, at least for the term of this 10year plan.	Include rats in the list of pest animals at Rule 6.5.4.1 (Site-led programmes for the Otago Peninsula).	Dunedin Site-led Programmes	Accept in part	See response to submission P291.3 regarding rats. Rats are not recommended to be included to Rule 6.4.5.1, but are recommended to be included in Objective 6.5.4.a.
P211.9	John Parker	Objective 6.5.4.b I support the progressive containment of a) banana passion fruit b) Chilean flame creeper c) Darwin's barberry d) sycamore e) Gunnera f) Tradescantia. Banana passion fruit, spread by birds, is a particular problem in my native bush. Each year new vines are found, often on steep slopes which are difficult to access. Vines are either dug out or cut and the stump painted with herbicide. In addition, any vines seen on road reserves in the vicinity are dealt with and ripe fruit collected. This is not a particularly difficult pest plant to deal with and I look forward to the ORC to taking a lead role in supporting community groups, such as STOP for assistance. However, clarification is required in the plan as to how ORC will take the lead, Action 3.4.1 draft ORC Biosecurity Plan.I would note that none of the other pest plants b) – f) are present on my 40a property, which is an indication that there are areas of the Peninsula still free of these problem plants.	General support for Objective 6.5.4 but request for further information around how ORC will lead removal of Banana Passionfruit.	Dunedin Site-led Programmes	Note	Support for Objective 6.5.4 is noted. Exactly how ORC will work with communities to manage banana passionfruit is an implementation matter.
P217.10	Predator Free NZ Trust	6.5.5 Site-led programmes at West Harbour – Mt. Cargill area Plan Objective 6.5.5.a We support Plan Objective 6.5.5.a which states: Over the duration of the Plan: a) preclude establishment of feral deer and Bennett's wallaby; and b) sustainably control feral cats, feral goats, feral pigs, hedgehogs and mustelids; and c) progressively contain possums to achieve a 2% RTC at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site. It is great to see Otago Regional Council taking a lead role in supporting community groups and agencies to protect biodiversity at this site. We also recommend the council adding rats to the Plan Objective. Controlling rats across this area is important for biodiversity to thrive. Council should include this in the plan.	Add rats to the list of pest animals under Objective 6.5.5.a Site-led programmes at West Harbour - Mt Cargill area.	Dunedin Site-led Programmes	Accept	See response to submission P291.2 regarding rats.
P217.12	Predator Free NZ Trust	6.5.6 Site-led programmes on Quarantine and Goat Islands Plan Objective 6.5.6 We support Plan Objective 6.5.6 which states: Over the duration of the Plan: a) preclude establishment of Bennett's wallaby, feral cats, feral deer, feral goats, feral pigs, mustelids, hedgehogs and possums; and b) eradicate rats on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site. Council should include this Plan Objective 6.5.6 in the plan.	Adopt Objective 6.5.6 as proposed.	Dunedin Site-led Programmes	Accept	The submitter supports Objective 6.5.6.
P217.13	Predator Free NZ Trust	Plan Rule 6.5.6.1 We support Plan Rule 6.5.6.1 which states: No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on Quarantine and Goat Islands (identified on Map 3 in Appendix 3) any: a) Bennett's wallaby; b) feral cat; c) feral deer; d) feral goat; e) feral pig; f) mustelid; g) hedgehog; h) possum; or i) rat. A breach of this rule creates an offence under section 154N(19) of the Act. Council should include this Plan Rule 6.5.6.1 in the plan.	Adopt Rule 6.5.6.1 as proposed.	Dunedin Site-led Programmes	Accept	The submitter supports Rule 6.5.6.1.
P217.6	Predator Free NZ Trust	We support the inclusion of hedgehogs, mustelids, 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 for site-led programmes.	Dunedin Site-led Programmes	Accept	The submitters supports the inclusion of the animal pests in the Dunedin site-led programmes.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P217.8	Predator Free NZ Trust	Table 26: Aims and means of achievement for site-led programmes on the Otago Peninsula Plan objective 6.5.4a. We support Plan Objective 6.5.4a which states: Over the duration of the Plan: a) preclude establishment of feral deer, feral goats, feral pigs and Bennett's wallaby; and b) eradicate possums; and c) sustainably control feral cats, hedgehogs and mustelids on the Otago Peninsula to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site. The plans for Otago Peninsula are ambitious and the region will reap the benefits of controlling predators on the peninsula. We congratulate the council for supporting this initiative. And are strongly supportive of eradicating possums from the peninsula. We would like council to accept this objective in the plan.	Objective 6.5.4.a is adopted as proposed.	Dunedin Site-led Programmes	Accept	The submitter supports Objective 6.5.4.a.
P223.4	Grant Lester	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P223.5	Grant Lester	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P223.6	Grant Lester	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P223.7	Grant Lester	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P224.4	Alan Roberts	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P224.5	Alan Roberts	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P224.6	Alan Roberts	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P224.7	Alan Roberts	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P225.4	Grant Crawford	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P225.5	Grant Crawford	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P225.6	Grant Crawford	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P225.7	Grant Crawford	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P231.4	Keith Marshall	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P231.5	Keith Marshall	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P231.6	Keith Marshall	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P231.7	Keith Marshall	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P237.4	Mary Pearson	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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P237.5	Mary Pearson	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P237.6	Mary Pearson	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P237.7	Mary Pearson	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P258.21	Forest and Bird	Site led objectives and rules: The site led objectives and rules need to incorporate all the same species and set out similar management for each of the interconnected sites to help limit potential for reinvasion into controlled sites. The comments we make below apply to all the site led programs, except where stated. To enable these programs to be effective and achieve the Plan's objectives there is a need to have a regulatory backstop to provide for situations where land occupiers are either unwilling or unable to participate in community led programs as long term non co-operation can prevent the success of a control measure to the detriment of the wider community and biodiversity. Good neighbor rules may be the most effective method to achieve this.	Site-led programmes are amended to incorporate the same species. A regulatory backstop is provided to ensure landowner compliance with site-led rules.	Dunedin Site-led Programmes	Accept in part	See responses to submission P289.9 and P298.5.
P258.22	Forest and Bird	Objectives 6.5.4.a, b, 6.5.5. a, b and 6.5.6 a, b are amended as follows: Feral cats, hedgehogs and mustelids should be listed as progressive containment and the rules amended to include feral cats. Add rats as progressive containment with the possibility of determining sites within sites, especially to provide buffering to areas that are free or being cleared of rats. Boxthorn is progressively spreading around the coast and has been recently cleared from Quarantine Island. This programme will not be successful unless the plants are also removed from neighbouring sites. Similarly for Cotoneaster. Russell lupin need to be excluded from all sites within the site led programs	Feral cats, hedgehogs, mustelids and rats listed as progressive containment under site-led programmes. Boxthorn, Cotoneaster and Russell lupin added to all site-led programmes.	Dunedin Site-led Programmes	Reject in part	Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. The Panel does not recommend the progressive containment of the other species listed in the submission.
P259.2	Lala Frazer	I wish to endorse the submission made by Save The Otago Peninsula in terms of the specific provisions for the Proposed Pest management Plan - and also for the Proposed Biosecurity Strategy. This includes adding cotoneaster, Cape Ivy and Gunnera species.	Add cotoneaster, Cape Ivy and Gunnera as site led species.	Dunedin Site-led Programmes	Reject in part	See response to submission P289.9. Cape ivy is already a progressive containment species.
P267.9	Arrowtown Village Association	We support the inclusion of hedgehogs, mustelids, 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 we would like possums defined as a pest for sustained control.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P268.10	Fiona Rowley	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P268.8	Fiona Rowley	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P268.9	Fiona Rowley	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P279.1	Jenny Winter	6.5.4 Site-led programmes on the Otago Peninsula Plan objective 6.5.4a I support the ORC taking a role in supporting community groups, in particular those involved in possum control on the Otago Peninsula. I would like the ORC to include occupier control responsibilities and enforcement of those responsibilities in its Plan, to ensure that the Otago Peninsula is freed of possums.	Support site-led programmes on Otago Peninsula but include occupier control responsibilities.	Dunedin Site-led Programmes	Accept in part.	Support for the Otago Peninsula site-led programme is acknowledged. All site-led pests are subject to Sections 52 and 53 of the Act, which prevents the communication, release, spread, sale and propagation of pests. Additionally, the site-led rules require that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present the animal species in the site-led programmes. This means that no person can knowingly harbour animals such as possums. In these circumstances, ORC can issue a notice of direction and undertake direct control or enforcement action as necessary.
P279.2	Jenny Winter	Plan objective 6.5.4b I support the provisions. However, I would like to see more enforcement of responsibility for pest plant infestations. Banana passionfruit is widespread in residential areas of the Peninsula, often close to the Hereweka/Harbour Cone block and other bush remnants. Much of this infestation is on road reserve and therefore the responsibility of the DCC. Cotoneaster is increasingly appearing on road reserves also.	Increase enforcement of responsibilities to contain pest plants on the Otago Peninsula.	Dunedin Site-led Programmes	Note	The Panel notes that ORC staff will liaise directly with DCC on the control of pest plants within road reserves in the site-led areas.
P279.3	Jenny Winter	6.5.6 Site-led programmes on Quarantine and Goat Islands I support the Plan Objective 6.5.6. However, I would like to see the ORC include plant pests in the Quarantine and Goat Island programmes. Bomarea has been observed on both islands and should be eradicated. The small Pudding Island/Titiremoana is also significant as a potential seed source for Bomarea, given its closeness to Portobello.	Broaden site-led programmes on Quarantine and Goat Islands to include pest plants.	Dunedin Site-led Programmes	Accept in part	Plant pests are already recommended to be managed in the Otago Peninsula and West Harbour – Mt. Cargill areas and there is merit in including these in the Quarantine and Goat Island areas as the islands are a stepping stone between the two main areas. Adding an additional objective to include these species in Quarantine and Goat Islands is recommended and will mean they can be managed alongside the areas. The Panel is satisfied the amendment will not place any additional burden on land occupiers (Sections 52 and 53 of the Act already apply, and there are no occupier control rules), and so no further cost benefit analysis was determined to be needed as part of this plan review process. The Panel notes that the ORC is not aware of community pest control work undertaken on Pudding Island. Bomarea is a region wide pest and no site-led programme is therefore needed.
P282.9	Duncan Keenan	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P283.9	Wakatipu Reforestation Trust	We support the inclusion of hedgehogs, mustelids, 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 we would like possums defined as a pest for sustained control.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P286.11	New Zealand Transport Agency	Section 6.5 Pests to be managed under site-led programmes. The West Harbour - Mt Cargill site-led programme affects the Transport Agency because its area captures all of SH88 and the portion of SH1 from Dunedin to Waitati. The programme seeks to progressively contain (over 10 years) the following: Banana passionfruit, Chilean flame creeper, Sycamore, Darwin's barberry, Tradescantia. This is a new programme with an expanded list of species. It will require the Transport Agency to undertake an assessment of the presence of these pest plants on the network to enable an eradication programme to be developed and the costs understood.	Support the site-led programme for the West Harbour - Mt Cargill area and recognise the role of NZTA.	Dunedin Site-led Programmes	Accept	The Panel acknowledge how NZTA intends to respond to the West Harbour - Mt. Cargill site-led programme.
P289.8	Director General of Conservation	I seek more ambitious control measures for mustelids, feral cats and hedgehogs in the PFD site-led programmes on Otago Peninsula, West Harbour-Mt Cargill and Urban Link (p73-76). I submit that these species come under progressive containment within the current and any future site-led PFD areas.	Progressive containment of mustelids, feral cats and hedgehogs in the PFD site-led programmes.	Dunedin Site-led Programmes	Accept in part	Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. Hedgehogs are included in the Dunedin site-led programmes and feral cats are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P289.9	Director General of Conservation	The lists of controlled weed species should be the same for all areas in PFD and these should also include the progressive containment of boxthorn, cotoneaster and Gunnera.	Provide consistency within PFD areas, progressive containment of boxthorn, cotoneaster and gunnera.	Dunedin Site-led Programmes	Accept in part	Plant pests are already recommended to be managed in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas and there is merit in including these in the Quarantine and Goat Island areas as the islands are a stepping stone between the two other areas. The Panel recommends the addition of an additional objective to include these species in the Quarantine and Goat Island areas and will mean they can be managed alongside the other areas. As this places no additional burden on land occupiers (Sections 52 and 53 of the Act already apply, and there are no occupier control rules), the Panel is satisfied that no further cost benefit analysis was required as part of this plan review process. Gunnera is already proposed to be managed in Otago Peninsula and Quarantine and Goat Island areas and there is merit in including gunnera in the other Dunedin site-led areas. The Panel recommends amending the objectives to include this species in all Dunedin site-led areas and will mean it can be managed alongside the other pest plants. The Panel notes that ORC staff do not have details of distribution or extent of cotoneaster or boxthorn and do not currently undertake surveillance of these species in Otago but are aware of their presence and impacts generally. Both species are listed in the Plan as Organisms of Interest and will be watch listed for ongoing surveillance or future control opportunities. ORC will be preparing guidance on the identification, effects and control methods for these species on ORC's proposed on-line 'pest hub' within the next year, in accordance with the project set out in Section 4.2 of the Strategy. The Panel does not recommend the addition of these species to the site-led programmes as part of this plan review.
P291.1	Predator Free 2050 Limited	Section 6.5 Pests to be managed under site-led programmes: Predator Free 2050 Limited strongly support the identification of the Otago Peninsula, West Harbour – Mt Cargill and Quarantine and Goat Islands areas as site-led programmes in the Proposed Regional Pest Management Plan in recognition of the non-production values at these sites, existing volunteer and community initiatives, and the environmental, social and cultural benefits that will result from enabling effective pest management across these sites. Without the correct objectives and rules for the site-led programmes, pests that are capable of causing damage to the sites may not be effectively excluded or eradicated from the sites, or contained, reduced, or controlled within the sites to an extent that protects the values of the sites. Several amendments are sought to ensure that the proposed objectives and rules are appropriately tailored to provide effective management of the values of importance at each site. These changes are detailed in the table below. Without such amendments, the Proposed Regional Pest Management Plan may fail to achieve its purpose, which is to provide a framework for the efficient and effective management/eradication of specified organisms, and that such inaction may impose undue social, cultural and environmental effects. Predator Free 2050 Limited submits that while resorting to enforcement should be the last option, rules should be adopted that require full landowner compliance to ensure that the objectives are met and significant community investment is protected. We note that occupier control responsibilities have not been included in section 6.5 in the Proposed Regional Pest Management Plan. Additional regulatory mechanisms should be provided in the Proposed Regional Pest Management Plan to serve as a back-up when landowner participation in community-led programmes doesn't occur. Predator Free 2050 Limited is concerned that the proposed rules may not be adequate to ensure effective management of possums on the Peninsula and West Harbour-Mt.Cargill, mustelids across West Harbour-Mt.Cargill and feral cats across all three sites. For these species it may be appropriate to include occupier responsibility rules, either now or sometime in the future if it is identified that inadequate progress is being made towards achieving the objectives in full and on time.	Support site-led programmes with amendments	Dunedin Site-led Programmes	Accept in part	Support for the site-led programmes is acknowledged, however, not all of the submitter's requested relief is recommended to be accepted.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P291.2	Predator Free 2050 Limited	Objective 6.5.4.a: b) strongly support the eradication of possums as proposed. Rats should be included in this section, with the Objective being sustained control. Good neighbour progressive containment rules could be applied to help prevent the spread of rats to the islands.	Amend Objective 6.5.4.a to include rats as a sustained control pest. Strongly support the eradication of possums as proposed.	Dunedin Site-led Programmes	Accept	Rats are already recommended to be managed on Quarantine and Goat Island areas and there is merit in including these in the other Dunedin site-led areas. Amending the objectives to include this species in all Dunedin site-led areas is recommended and will mean they can be managed alongside the other pest plants and animals. The Panel notes that as this places no additional burden on land occupiers (Sections 52 and 53 of the Act already apply, and there are no occupier control rules), no further cost benefit analysis is required as part of this plan review process. Good neighbour rules or progressive containment rules are not recommended. Support for the eradication of possums is acknowledged.
P291.3	Predator Free 2050 Limited	Plan Objective 6.5.5.a: Over the duration of the Plan: b) sustainably control feral cats, feral goats, feral pigs, hedgehogs and mustelids; and c) progressively contain possums to achieve a 2% RTC at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) to avoid, mitigate or prevent damage to the indigenous ecosystem values at this site. b) the Objective for feral cats, feral goats, feral pigs, hedgehogs and mustelids should be “progressive containment”, rather than just sustained control. As part of the contractual requirements with Predator Free 2050 Limited, Predator Free Dunedin has targets to suppress mustelids to low populations across the extent of the West Harbour-Mt.Cargill site led programme area. This requires a rule of progressive containment. Rats should be included in this section, with the Objective being sustained control. Good neighbour progressive containment rules could be applied to help prevent the spread of rats to the islands.	Amend objective 6.5.5.a to include rats in the West Harbour - Mt.Cargill programme and require the progressive containment of feral cats, feral goats, feral pigs, hedgehogs and mustelids.	Dunedin Site-led Programmes	Accept in part	See response to submission P291.2 regarding the sustained control of rats. Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. The progressive containment of the other species in the submission is not recommended.
P291.4	Predator Free 2050 Limited	We submit that mustelids require a ‘progressive containment’ categorisation within the West Harbour – Mt.Cargill site-led programme, which would align with the Predator Free Dunedin’s contractual obligations with Predator Free 2050 Limited.	The West Harbour – Mt.Cargill site-led programme is amended to require 'progressive containment' of mustelids.	Dunedin Site-led Programmes	Accept	See response to submission P291.3.
P293.10	Otago Peninsula Biodiversity Group	Point 6.5.6a (b) (page 83): Unclear, why are pest plant species such as Banana passion fruit and Darwin’s barberry omitted from site-led programmes on Quarantine and Goat islands. Both pest plants have fruits and seeds that are good food for rats and both are distributed by birds i.e. will be easily dispersed to the Otago Peninsula which has these pest plants listed on their site-led programme. Since Quarantine and Goat islands are important “stepping stones” between the Otago Peninsula and West Harbour, pest plants identified for neighbouring site-led programmes need to be included here.	Include Darwin's barberry and Banana passionfruit in site-led programmes on Quarantine and Goat Islands	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P293.5	Otago Peninsula Biodiversity Group	In particular, 6.1 Rats (Norway, ship and Kiore) need to be included into both the Otago Peninsula and West Harbour site-led programmes. Rats can swim considerable distances. As good neighbours, we need to control rats at landscape scale to support proposed island rat eradication efforts and reduce the likelihood of reinvasion following successful eradication. 6.2 All pest plants identified for the Otago Peninsula and West Harbour need to be listed for Quarantine and Goat Islands to reduce the likelihood of seeds spreading to adjacent shores. In addition, removing important pest food plants for rats will further support rat eradication efforts on these islands.	Include rats into the Otago Peninsula and West Harbour site-led programmes. Include the same list of pest for all site-led programmes.	Dunedin Site-led Programmes	Accept	See response to submission P291.2 regarding rats. See response to submission 289.1 regarding pest plants.
P293.6	Otago Peninsula Biodiversity Group	Table 26 (page 79): Aims and means of achievement for site-led programmes on the Otago Peninsula. OPBG suggests to remove the sentence “It is not proposed to introduce occupier control responsibilities at this stage” from the table.	Delete “It is not proposed to introduce occupier control responsibilities at this stage”.	Dunedin Site-led Programmes	Reject in part	Landowner responsibility is strongly encouraged. Landowner control rules are not recommended at this stage. It is recommended that “It is not proposed to introduce occupier control responsibilities at this stage” be amended to “It is not proposed to introduce occupier control rules at this stage” to make this distinction clearer.
P293.7	Otago Peninsula Biodiversity Group	Plan objective 6.5.4a (c) (page 79): and throughout the draft - the objective is “sustained control” and not to “sustainably” control pests.	Amend 'sustainably control' to 'sustained control'.	Dunedin Site-led Programmes	Accept	Sustained control is a term defined in the NPD and is defined in Section 5.4 of the Plan as 'to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties'. The Panel recommends the objective should be amended, with consequential amendments throughout the Plan.
P293.9	Otago Peninsula Biodiversity Group	Plan objectives 6.5.4a & 6.5.5.a: As illustrated under P293.5, as good neighbours we need to reduce the risk of rat reinvasion to the harbour islands from the immediately adjacent Portobello Peninsula. Thus, the “sustained control of rats” will need to be included as an objective. Plan objective 6.5.4a and 6.5.5a: OPBG encourage the ORC to be more ambitious and aim for “progressive containment” of all other pest species currently listed here.	Include the sustained control of rats and progressive containment of all other listed species in objectives 6.5.4.a. & 6.5.5.a.	Dunedin Site-led Programmes	Accept in part	See response to submission 291.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P294.10	Save The Otago Peninsula	Plan Rule 6.5.4.1: STOP supports this rule and would like the addition of feral cats and chinchilla.	Feral cats and chinchilla are added to Plan Rule 6.5.4.1	Dunedin Site-led Programmes	Accept in part	It is recommended to add feral cats to Rule 6.5.4.1. It is not recommended to include chinchillas to the site-led programme as the Panel does not consider chinchillas to be a threat in Otago.
P294.11	Save The Otago Peninsula	Plan Objective 6.5.6 STOP supports site -led programmes on Quarantine Island / Kamau Taurua and Goat Island / Rarikiki. STOP supports a) preclude establishment of Bennett's wallaby, feral cats, feral deer, feral goats, feral pigs, Mustelids, hedgehogs and possums; and b) eradicate rats	Support Objective 6.5.6	Dunedin Site-led Programmes	Accept	The submitter supports Objective 6.5.6.
P294.12	Save The Otago Peninsula	Plan Rule 6.5.6.1: We support this rule. There is no Objective for pest plants on the islands, which is a strange omission considering the islands are described as "stepping stones" between Otago Peninsula and West Harbour, both having objectives for pest plants, several of which are dispersed by birds. Over the years STOP members visiting Goat Island have noticed the spread of Banana passion fruit, from where it could easily spread to Quarantine island. And the fleshy fruits are a food source for the rats that the Quarantine Island community hope to eradicate. STOP understands the Quarantine island community are controlling Darwin's barberry, but existing plants are a seed source for dispersal by birds to Goat Island. STOP suggests that it would be logical to add an Objective for pest plants, the list being the same as for Otago Peninsula plus the addition of one species of ivy.	Support Plan Rule. Add pest plants included in the site-led programme for the Otago Peninsula.	Dunedin Site-led Programmes	Accept	See the response to submission P289.9.
P294.6	Save The Otago Peninsula	6.5.2 STOP supports the site-led programme for the Otago Peninsula and supports the inclusion of all plant and animal pests listed in Table 24.	Support the Otago Peninsula site-led programme and listed pest plants and pest animals.	Dunedin Site-led Programmes	Accept	The submitter supports the Otago Peninsula site-led programme.
P294.8	Save The Otago Peninsula	Plan Objective 6.5.4.a: STOP supports a) preclude establishment of feral deer, feral goats, feral pigs and Bennett's wallaby and suggest that is included to the list, and also retain chinchilla. STOP Supports b) eradicate possums. STOP does not support sustained control of hedgehogs and Mustelids and feral cats; progressive containment would be more appropriate for hedgehogs and Mustelids. STOP does not support sustained control of feral cats, which are very destructive to native wildlife. STOP wishes feral cats to be included in an eradication programme. In order to accurately identify a feral cat, microchipping of all domestic cats will be necessary and STOP requests that ORC consider this mechanism. STOP would like rats added to the list of Animals classified as pests. STOP members trap rats at several sites of high biodiversity value and we encourage local residents to do the same. Over the duration of the Plan it would be appropriate for a sustained control objective for rats. Eventually the aim should be for progressive containment, as the community works towards localized rat suppression in areas of high biodiversity.	Plan Objective 6.5.4.a is amended as follows: hedgehogs and mustelids are amended to progressive containment programmes; feral cats are amended to eradication programme (with microchipping of cats supported); rats are added to the list of pests under this objective for sustained control.	Dunedin Site-led Programmes	Accept in part	See response to submission P291.3 regarding the sustained control of rats. Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. The eradication of feral cats on the Otago Peninsula is not recommended.
P294.9	Save The Otago Peninsula	Principal measures to be used (objective 6.5.4) STOP supports ORC taking a lead role in supporting community efforts and anticipates that council inspection and service delivery will be crucial in achieving objectives 6.5.4 (As previously noted under Plan Rule 6.3.2.1). STOP supports the possibility of introducing occupier control responsibilities for site-led pest plants, but wishes to see a rule in this Plan for landowner compliance for possums. The decision STOP would like the ORC to make is to include occupier control responsibilities and the ability to enforce those responsibilities for possums on the site-led programme for the Otago Peninsula. Support now from ORC could provide a mechanism to assist with the most difficult stage - getting the last possums. This community project has reached the stage where a single landowner could jeopardise the ability to achieve eradication. It is crucial that ORC includes a rule in the Plan that provides a mechanism for enforcement in the case of a landowner not allowing access for possum control and monitoring. In STOP's view, introducing occupier control responsibilities for site-led pest plants, at this stage would be impossible for ORC to implement. However, consideration should be given to "good neighbour" rules as one unsympathetic householder can undermine the weed control undertaken in the surrounding area.	Principal measures to be used for Objective 6.5.4 are amended to require the occupier to control responsibilities for site-led programmes, and the inclusion of a landowner compliance mechanism for the control of possums.	Dunedin Site-led Programmes	Reject in part	Support for the Otago Peninsula site-led programme is acknowledged. All site-led pests are subject to Sections 52 and 53 of the Act, which prevents the communication, release, spread, sale and propagation of pests. Additionally, the site-led rules require that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present the animal species in the site-led programmes. This means that no person can knowingly harbour animals such as possums. In these circumstances, ORC can issue a notice of direction and undertake direct control or enforcement action as necessary.
P295.13	Landscape Connections Trust Halo Project	Plan Objective 6.5.5.a: a) tahr should be included in the "preclude establishment" list. b) the Objective for feral cats, feral goats, feral pigs, hedgehogs and mustelids should be "progressive containment", rather than just sustained control. As part of the contractual requirements with PF2050 Ltd, Predator Free Dunedin has targets to suppress mustelids to low populations across the extent of the West Harbour-Mt.Cargill site led programme area. This requires a rule of progressive containment. Rats should be included in this section, with the Objective being sustained control. Good neighbour progressive containment rules could be applied to help prevent the spread of rats to the islands. Maybe rats could be included in the Objective but not in the rule? Need to set the intention for progressive containment but can't see a site-wide rules being the right approach. Maybe small-scale site rules and/or good neighbour rules could come in later (sites within sites). Areas such as Port Chalmers play an important role in protecting rats from re-invading Quarantine Island, which is subject to a rat eradication effort as part of PFD.	Objective 6.5.5.a is amended as follows: 1. Tahr is added as a 'preclude establishment' species. 2. The objective for feral cats, feral goats, feral pigs, hedgehogs and mustelids is changed to "progressive containment", rather than "sustained control" as proposed. 3. Rats are included in the Objective, under "sustained control", or a similar addition to the Rule/Objectives is made to appropriately manage rats.	Dunedin Site-led Programmes	Accept in part	See response to submission P291.2 regarding the sustained control of rats. The spread of rats to the islands is controlled by Rule 6.5.6.1. However, the preclusion of tahr is not recommended as the management of tahr is primarily undertaken by DOC. Including tahr would not pose any responsibility on occupiers, and the Panel does not wish to duplicate control responsibilities with DOC. Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P295.14	Landscape Connections Trust Halo Project	Plan Objective 6.5.5.b: Gunnera, boxthorn and cotoneaster should be added to this list. Also, should these species be added to the “pest plants” list rather than just the “organisms of interest” list so that they can be managed alongside the other pest plants for this site? Should we have some “good neighbour rules” for pest plants?	Objective 6.5.5.b is amended as follows: 1. Gunnera, boxthorn and cotoneaster are added. 2. Consideration is given to whether Gunnera, boxthorn and cotoneaster should be changed from 'organisms of interest' in the plan to 'pest plants'. 3. Consideration is given to whether good neighbour rules should be developed for pest plants.	Dunedin Site-led Programmes	Accept in part	See response to submissions P289.9 and P298.19.
P295.16	Landscape Connections Trust Halo Project	Plan Objective 6.5.6. Support, but need to add the the same flora objectives as apply to Peninsula and WHMC, plus German Ivy. Most of the pest weeds within the site-led plans are dispersed by birds, and as such it makes good sense to implement a consistent approach to weed management across the three site-led areas.	Retain Plan Objective 6.5.6, with the exception that the pest plant species contained in the Objectives relevant to the Otago Peninsula and West Harbour - Mt Cargill site-led programmes are replicated in the Quarantine and Goat Island Objectives.	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P295.17	Landscape Connections Trust Halo Project	Rule 6.5.6.1. Support.	Retain Rule 6.5.6.1	Dunedin Site-led Programmes	Accept	The submitter supports Rule 6.5.6.1.
P295.2	Landscape Connections Trust Halo Project	Section 6.5 of the PRPMP (site-led programmes): LCT strongly support the identification of the Otago Peninsula, West Harbour – Mt Cargill and Quarantine & Goat Islands areas as site-led programmes in the PRPMP in recognition of the non-production values at these sites, existing volunteer and community initiatives, and the environmental, social and cultural benefits that will result from enabling effective pest management across these sites. Without the correct objectives and rules for the site-led programmes, pest organisms that are capable of causing damage to the sites may not be effectively excluded or eradicated from the sites, or contained, reduced, or controlled within the sites to an extent that protects the values of the sites. Several amendments are sought to ensure that the proposed objectives and rules are appropriately tailored to provide effective management of the values of importance at each site. These changes are detailed in the table attached to this submission. LCT believe that without these amendments, the PRPMP may fail to achieve its purpose, which is to provide a framework for the efficient and effective management/eradication of specified organisms, and that such inaction may impose undue social, cultural and environmental effects.	Support intent of site-led programmes, subject to amendments sought.	Dunedin Site-led Programmes	Accept in part	The submitter's support for the Dunedin site-led programmes is acknowledged, however not all of the submitter's requested relief is recommended to be accepted. This is set out in more detail in response to the submitters other submission points.
P295.3	Landscape Connections Trust Halo Project	Section 6.5 of the PRPMP (site-led programmes), Table 24. LCT support the inclusion of all of the pests listed in Table 24 but note that management of these pests is not proposed at all of the appropriate sites, which we see as a potential issue. Further information regarding which pests we feel require management at which sites is provided in the table attached to this submission.	Support the inclusion of pests listed in Table 24, but seek that management of these pests is proposed at all of the site-led programmes contained in the Plan (further details provided below).	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P295.4	Landscape Connections Trust Halo Project	Section 6.5 of the PRPMP (site-led programmes): LCT are of the view that resorting to enforcement should be the last option, however, refer to PFD's original submission which requested that rules are adopted requiring full landowner compliance to ensure that the objectives are met. We note that occupier control responsibilities have not been included in section 6.5 in the PRPMP, and so in addition to the recommended amendments outlined in the attached table, LCT believes that additional regulatory mechanisms should be provided in the PRPMP to serve as a back-up when landowner participation in community-led programmes doesn't occur. LCT are particularly concerned that the proposed rules may not be adequate to ensure effective management of possums and mustelids and feral cats across West Harbour-Mt.Cargill. For these species it may be appropriate to include occupier responsibility rules, either now or sometime in the future if it is identified that inadequate progress is being made towards achieving the objectives in full and on time.	Rules are developed as a backstop to ensure landowner compliance with site-led objectives.	Dunedin Site-led Programmes	Reject	See response to submission P298.5.
P295.5	Landscape Connections Trust Halo Project	Section 6.5 of the PRPMP (site-led programmes): LCT believe that mustelids require a 'progressive containment' categorisation within the West Harbour – Mt.Cargill site-led programme, aligning within the PFD contractual obligations with PF2050 Ltd. The current 'sustained control' rule is insufficient, and does not provide the regulatory tool to compliment our voluntary programme.	Mustelids included in the West Harbour - Mt Cargill site-led programme are managed through 'progressive containment'.	Dunedin Site-led Programmes	Accept	See response to submission P291.3.
P296.4	Morgan Foundation	We support Plan objective 6.5.4.a. the site-led programme for the Otago Peninsula and support the objectives, principle measures and rules set out in table 26 to accomplish this. We congratulate the council for supporting this initiative. And are strongly supportive of eradicating possums from the peninsula. 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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P296.5	Morgan Foundation	We support Plan objective 6.5.5, the site-led programme for West Harbour - Mt. Cargill. We also recommend the council adding rats to Plan Objective 6.5.5.a. Controlling rats across this area is important for biodiversity to thrive. It would be prudent to include pest cats in Plan Rule 6.5.5.1. Council should include this rule in the plan with the addition of cats.	Support for site-led programme for West Harbour - Mt. Cargill. Add rats to objective 6.5.5.a. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P296.6	Morgan Foundation	We support Plan objective 6.5.6, the site-led programme for Quarantine and Goat Islands. We support Plan Rule 6.5.6.1. Council should include this Plan Objective 6.5.6 and Plan rule 6.5.6.1 in the plan.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P297.4	Forest & Bird - Tautuku Restoration Project	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P297.6	Forest & Bird - Tautuku Restoration Project	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P297.7	Forest & Bird - Tautuku Restoration Project	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P297.8	Forest & Bird - Tautuku Restoration Project	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P298.18	Predator Free Dunedin	Objective 6.5.4.a Otago Peninsula site-led Objectives: b) strongly support the eradication of possums as proposed c) the Objective for feral cats, hedgehogs and mustelids should be "progressive containment", rather than just sustained control. Rats should be included in this section, with the Objective being sustained control. Good neighbour progressive containment rules could be applied to help prevent the spread of rats to the islands. Need to set the intention for progressive containment but can't see a site-wide rules being the right approach. Maybe small-scale site rules and/or good neighbour rules could come in later (sites within sites e.g. Portobello peninsula and Port Chalmers, to protect Quarantine Island from rat invasion).	Objective 6.5.4.a is amended as follows: 1. Eradication for possums is retained. 2. The objective for feral cats, hedgehogs and mustelids is changed from 'sustained control' (as proposed) to 'progressive containment'. 3. Good neighbour progressive containment rules, or some other measure, are introduced to ensure rats do not spread to Quarantine island.	Dunedin Site-led Programmes	Accept in part	See response to submission P291.3 regarding the sustained control of rats. Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended. The progressive containment of cats on the Otago Peninsula is not recommended.
P298.19	Predator Free Dunedin	Plan Objective 6.5.4.b Otago Peninsula site-led Objectives: Boxthorn and cotoneaster should be added to this list. Also, should these species be added to the "pest plants" list rather than just the "organisms of interest" list so that they can be managed alongside the other pest plants for this site? Russell lupin is included in section 6.4.1 of the PRPMP under sustained control across the wider region, but it needs to be excluded from Otago Peninsula. Should we have some "good neighbour rules" for pest plants?	Objective 6.5.4.b is amended as follows: 1. Boxthorn and cotoneaster are added to the list of pest plants for the site-led programme, and considered for the pest plant list for the entirety of the Plan. 2. Russell lupin is added to the list of site-led pests. 3. Good neighbour rules are considered for pest plants on the Peninsula.	Dunedin Site-led Programmes	Reject	It is not recommended to include Russell lupins in Objective 6.5.4.b as the Plan contains region wide rules for this species. See response to submission P289.9 regarding boxthorn and cotoneaster. All site-led pests are subject to Sections 52 and 53 of the Act, which prevents the communication, release, spread, sale and propagation of pests. Additionally, the site-led rules require that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present the animal species in the site-led programmes. This means that no person can knowingly harbour animals such as possums. In these circumstances ORC can issue a notice of direction and undertake direct control or enforcement action as necessary. No additional rules are recommended at this time.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.2	Predator Free Dunedin	Recommended amendments to section 6.5 of the PRPMP (site-led programmes): PFD strongly support the identification of the Otago Peninsula, West Harbour – Mt. Cargill and Quarantine & Goat Islands areas as site-led programmes in the PRPMP in recognition of the nonproduction values at these sites, existing volunteer and community initiatives, and the environmental, social and cultural benefits that will result from enabling effective pest management across these sites. Without the correct objectives and rules for the site-led programmes, pest organisms that are capable of causing damage to the sites may not be effectively excluded or eradicated from the sites, or contained, reduced, or controlled within the sites to an extent that protects the values of the sites. Several amendments are sought to ensure that the proposed objectives and rules are appropriately tailored to provide effective management of the values of importance at each site. These changes are detailed in the table attached to this submission. PFD believe that without these amendments, the PRPMP may fail to achieve its purpose, which is to provide a framework for the efficient and effective management/eradication of specified organisms, and that such inaction may impose undue social, cultural and environmental effects.	Support intent of site-led programmes, subject to amendments sought.	Dunedin Site-led Programmes	Accept in part	The submitter's support for the Dunedin site-led programmes is acknowledged, however not all of the submitter's requested relief is recommended to be accepted. This is set out in more detail in response to the submitters other submission points.
P298.21	Predator Free Dunedin	Plan Objective 6.5.5.a: the Objective for feral cats, feral goats, feral pigs, hedgehogs and mustelids should be “progressive containment”, rather than just sustained control. As part of the contractual requirements with PF2050 Ltd, PFD has targets to suppress mustelids to low populations across the extent of the West Harbour-Mt. Cargill site led programme area, which is why we require an objective of progressive containment. Rats should be included in this section, with the Objective being sustained control. Good neighbour progressive containment rules could be applied to help prevent the spread of rats to the islands. Need to set the intention for progressive containment but can't see a site-wide rules being the right approach. Maybe small-scale site rules and/or good neighbour rules could come in later (sites within sites). Areas such as Port Chalmers play an important role in protecting rats from re-invading Quarantine Island, which is subject to a rat eradication effort as part of PFD.	Objective 6.5.5.a is amended as follows: 1. The objective for feral cats, hedgehogs and mustelids is changed from 'sustained control' (as proposed) to 'progressive containment'. 2. Rats are included as a pest for 'sustained control'. 3. Good neighbour progressive containment rules, or some other measure, are introduced to ensure rats do not spread to islands.	Dunedin Site-led Programmes	Accept in part	See response to submission 295.13.
P298.22	Predator Free Dunedin	Plan Objective 6.5.5.b: Gunnera, boxthorn and cotoneaster should be added to this list. Also, should these species be added to the “pest plants” list rather than just the “organisms of interest” list so that they can be managed alongside the other pest plants for this site? Should we have some “good neighbour rules” for pest plants?	Objective 6.5.5.b is amended as follows: 1. Gunnera, boxthorn and cotoneaster are added. 2. Consideration is given to whether Gunnera, boxthorn and cotoneaster should be changed from 'organisms of interest' in the plan to 'pest plants'. 3. Consideration is given to whether good neighbour rules should be developed for pest plants.	Dunedin Site-led Programmes	Accept in part	See response to submissions P289.9 and P298.19.
P298.24	Predator Free Dunedin	Plan Objective 6.5.6 Site-led programmes on Quarantine and Goat Islands: Support all of this.	Objective is retained.	Dunedin Site-led Programmes	Accept	The submitter supports Objective 6.5.6.
P298.25	Predator Free Dunedin	Site-led programmes on Quarantine and Goat Islands: Need to add the same flora objectives as apply to Peninsula and WHMC, plus German Ivy. Most of the pest weeds within the site-led plans are dispersed by birds, and as such it makes good sense to implement a consistent approach to weed management across the three site-led areas.	Objective 6.5.6 is amended to include the pest plant species contained in the Objectives relevant to the Otago Peninsula and West Harbour - Mt Cargill site-led programmes are replicated in the Quarantine and Goat Island Objectives, with the additional inclusion of German Ivy.	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P298.26	Predator Free Dunedin	Plan Rule 6.5.6.1: Support all of this.	Plan Rule 6.5.6.1 is retained.	Dunedin Site-led Programmes	Support	The submitter supports Rule 6.5.6.1.
P298.3	Predator Free Dunedin	Recommended amendments to section 6.5 of the PRPMP (site-led programmes): PFD support the inclusion of all of the pests listed in Table 24 but note that management of these pests is not proposed at all of the appropriate sites, which we see as a potential issue. Further information regarding which pests we feel require management at which sites is provided in the table attached to this submission.	Support the inclusion of pests listed in Table 24, but seek that management of these pests is proposed at all of the site-led programmes contained in the Plan.	Dunedin Site-led Programmes	Accept	See response to submission P289.9.
P298.4	Predator Free Dunedin	Section 6.5 of the PRPMP (site-led programmes): PFD believe that mustelids require a “progressive containment” categorisation within the West Harbour – Mt. Cargill site-led programme, aligning within the PFD contractual obligations with PF2050 Ltd.	Mustelids included in the West Harbour - Mt Cargill site-led programme are managed through 'progressive containment'.	Dunedin Site-led Programmes	Accept	Given Predator Free Dunedin's contractual obligations to suppress mustelids to low numbers, the progressive containment of mustelids is recommended.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.5	Predator Free Dunedin	Section 6.5 of the PRPMP (site-led programmes): PFD are of the view that resorting to enforcement should be the last option, however, PFD's original submission also requested that rules are adopted requiring full landowner compliance to ensure that the objectives are met. We note that occupier control responsibilities have not been included in section 6.5 in the PRPMP, and so in addition to the recommended amendments outlined in the attached table, PFD believes that additional regulatory mechanisms should be provided in the PRPMP to serve as a back-up when landowner participation in community-led programmes doesn't occur. PFD are particularly concerned that the proposed rules may not be adequate to ensure effective management of possums across the Peninsula and West Harbour - Mt. Cargill sites, mustelids across West Harbour - Mt. Cargill, and feral cats across all three sites. For these species it may be appropriate to include occupier responsibility rules, either now or sometime in the future if it is identified that inadequate progress is being made towards achieving the objectives in full and on time.	Rules are developed as a backstop to ensure landowner compliance with site-led objectives either now or in the future.	Dunedin Site-led Programmes	Reject	All site-led pests are subject to Sections 52 and 53 of the Act, which prevents the communication, release, spread, sale and propagation of pests. Additionally, the site-led rules require that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present the animal species in the site-led programmes. This means that no person can knowingly harbour animals such as possums. In these circumstances ORC can issue a notice of direction and undertake direct control or enforcement action as necessary. No additional rules are recommended at this time, but could be considered if needed in the future.
P308.4	Kevin Voges	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P308.5	Kevin Voges	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P308.6	Kevin Voges	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P308.7	Kevin Voges	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P313.9	Carrie Pritchard	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P315.9	Andrew Davis	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests.
P318.9	Ben Teele	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P320.4	Bruce Jefferies	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P320.5	Bruce Jefferies	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P320.6	Bruce Jefferies	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P320.7	Bruce Jefferies	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P324.4	Aspiring Biodiversity Trust	I support the inclusion of hedgehogs, mustelids, 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.	Support for inclusion of hedgehogs, mustelids and rats as site-led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site-led pests. Possums are addressed separately in response to their other submission points.
P335.40	Barrie Wills	In relation to [Section 6.5] Consider altering to Site-managed or Site-specific??	Consider renaming site-led to site-managed or site-specific	Dunedin Site-led Programmes	Reject	'Site-led' is a term in the National Policy Direction and is described in Section 5.2 of the Plan.
P337.4	Marion Mertens	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.	Support for inclusion of hedgehogs, mustelids and rats as site led pests.	Dunedin Site-led Programmes	Accept in part	The submitter supports the inclusion of hedgehogs, mustelids and rats as site led pests. Possums are addressed separately in response to their other submission points.
P337.5	Marion Mertens	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.	Support for site-led programme on Otago Peninsula. Add pest cats to Rule 6.5.4.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on Otago Peninsula is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P337.6	Marion Mertens	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.	Support for site-led programme for West Harbour - Mt. Cargill. Add pest cats to Rule 6.5.5.1.	Dunedin Site-led Programmes	Accept in part	Support for the site-led programme on West Harbour - Mt. Cargill is acknowledged. See response to submission P128.3 with regards to the inclusion of 'pest cats'. However the Panel notes that 'feral cats' are recommended to be added to Rules 6.5.4.1 and 6.5.5.1 in response to submission P217.9.
P337.7	Marion Mertens	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.	Support the site-led programme for Quarantine and Goat Islands.	Dunedin Site-led Programmes	Accept	The submitter supports the site-led programme for Quarantine and Goat Islands.
P343.10	Quarantine Island Kamau Taurua Community Incorporated	The movement of boats around the harbour can result in the transferal of pests from one location to another. We encourage Council to look at specific actions for managing transfers of pest via boat.	Consider action for addressing the transfer of pests via boat.	Dunedin Site-led Programmes	Accept	Rule 6.5.6.1 seeks to address the transfer of pests by boat by requiring that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on Quarantine and Goat Islands any: Bennett's wallaby, feral cat, feral deer, feral goat, feral pig, mustelid, hedgehog, possum or rat.
P343.6	Quarantine Island Kamau Taurua Community Incorporated	The achievement of the goals specific for each site-led project is dependent upon the environmental conditions and management of adjacent sites. The invasive plants which will require management on both the Peninsula and West Harbour also need to be managed on Quarantine and Goat Islands. In addition to the plants listed presently for the Peninsula and West Harbour, all three sites need to include Cotoneaster and Boxthorn.	Provide consistency with the plant species managed via site-led programmes (Table 24) and include Cotoneaster and Boxthorn to these programmes.	Dunedin Site-led Programmes	Accept in part	Plant pests are already recommended to be managed in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas and there is merit in including these in the Quarantine and Goat Island areas as the islands are a stepping stone between the two other areas. Adding an additional objective to include these species in the Quarantine and Goat Island areas is recommended by the Panel and will mean they can be managed alongside the other areas. As this places no additional burden on land occupiers (Sections 52 and 53 of the Act already apply, and there are no occupier control rules), the Panel is satisfied that no further cost benefit analysis was required as part of this plan review process. The Panel does not have details of distribution or extent of cotoneaster or boxthorn and do not currently undertake surveillance of these species in Otago but are aware of their presence and impacts generally. Both species are listed in the Plan as Organisms of Interest and will be watch listed for ongoing surveillance or future control opportunities. ORC will be preparing guidance on the identification, effects and control methods for these species on ORC's proposed on-line 'pest hub' within the next year, in accordance with the project set out in Section 4.2 of the Strategy. The Panel does not recommend the addition of these species to the site-led programmes as part of this plan review process.
P343.7	Quarantine Island Kamau Taurua Community Incorporated	The achievement of Predator Free Dunedin goals specific to both West Harbour and the Peninsula is also dependent upon the action being undertaken in the area referred to as 'Urban Linkage' which is a buffer to both those areas. We would recommend the 'Urban Linkage' area be included as an additional site-led focus.	Include the 'Urban Linkage' area as a site-led programme.	Dunedin Site-led Programmes	Reject	See response to submission P201.8. The project can be monitored for future consideration as a site-led programme. However, it is noted that site-led programmes should have important values that require protecting, such as significant vegetation or outstanding natural character features and landscape. ORC is able to support the Dunedin Urban Linkage without regulating this in the Plan.
P343.8	Quarantine Island Kamau Taurua Community Incorporated	Presently the timeframes specified in the plan (Table 5) are out of sync with the deliverables for Predator Free Dunedin. It is likely Council will benefit from the voluntary action of Dunedin residents and should therefore seek to prioritise work to support this.	The timeframes specified in the plan (Table 5) are out of sync with the deliverables for Predator Free Dunedin	Dunedin Site-led Programmes	Note	It is noted that this submission may be in error as table 5 in the Plan relates to exclusion pests. The Panel notes that the submitter did not provide any further clarification or attend the hearing.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P011.1	Pamela Harris	So what does it take for the cat that is your companion, your baby that makes you smile every day, helps you through tough times, shares the joy of happiness with you and is simply a family member you love, what will it take for this cat to end up in grave danger? Well..... all it takes is for the cat to be classified as a pest! If you live rurally and are unlucky enough to have a cat hating neighbour, the minute your cat steps on their property he or she may end up being killed. Your neighbour will tell you that they thought it was a 'BIG FERAL PEST' that your local government authority wants to eradicate and he shot it and absolutely nothing you can do about it! Another scenario - You may have cat loving neighbours, but your properties are bordering with DOC reserve or ORC land and one day you coming home from work and can't find your cat, why? You're trying to search the area and then the warning sign with a skull and bones comes to your attention ....it says that poison was put in the reserve that targets a variety of pests including feral cats and hedgehogs, and yes it was laid at the recommended distance from your lifestyle property, but nothing stopped your cat from wondering further away from home, as he loves exploring! And apparently not only your cat vanished but your cat loving neighbour lost their cats too and oh, yes all of them were microchipped, Did it help? No! Because poison does not discriminate, microchipped or not! And there will be many other legal ways to kill your pet cat as soon as cats are put into the pest category and subject to the pest management plan. I lost one of my cats to a 1080 operation already and they were not even targeting cats, they were targeting possums! So how it all will change now? I'm horrified at the treatment of the animals that are classified as pests in New Zealand! Remember those 'lovely' kids in the rural locations of NZ that are taught to kill 'pests' by their uneducated parents and teachers? In the future, instead of bringing possums to the weighting table to prove what a big killer he is, that boy will bring their neighbour's beloved Smokey, Boots or Tiger! And why not right? They are taught not to value life, not to have compassion to animals at very young age, so what would you expect from them if they can't tell basic right from wrong? Its simple really cats are pets NOT pests you really need to get your priorities right.	Remove feral cats from the Plan.	Feral Cats	Reject	There are no rules that require the culling or microchipping of cats in the Plan. Feral cats are included in the Dunedin site-led programmes only and the impacts feral cats have on biodiversity is described in Table 25. There are no region wide objectives or rules regarding feral cats, nor are there any rules that require pet cats or stray cats to be managed in any way. ORC follows animal welfare guidelines with all animal control programmes. This means using efficient and humane best-practice techniques and adhering to the Animal Welfare Act 1999 at all times.
P013.1	Aleisha Bain	I oppose feral cats being classed as a pest on this proposal and do not believe they should be on the list. Some circumstances with cats and defining a feral cat from someone's actual pet is too much of a grey area and could lead to serious misuse of this proposal as well as provoke the public, especially those for cats. I agree that feral cats is a problem that needs to be managed but this is not the answer.	Remove feral cats from the Plan.	Feral Cats	Reject	There are no rules that require the culling or microchipping of cats in the Plan. There are no region wide objectives or rules regarding feral cats, nor are there any rules that require pet cats or stray cats to be managed in any way. Feral cats are included in the Dunedin site-led programmes only and the impacts feral cats have on biodiversity is described in Table 25. ORC has not carried out or been involved in the control of cats to date, and the inclusion of feral cats in the Plan is a commitment that ORC will work with the other organisations and groups and communities in the Dunedin site-led areas to work on this issue together. This is especially important where community members are concerned about animal welfare and unintended consequences for their pet cats. A definition of 'feral cat' and amendments to Table 25 to clarify that the Plan applies to feral cats only, and not pet or stray cats, is recommended. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. The Panel notes that ORC staff will consider the requests provided in submissions when developing this plan of action (such as trap, neuter, release, microchipping, free or subsidised desexing, etc.).
P014.2	Kim Meredith-Jones	but I do not feel that feral cats should be included as differentiating between domestic and feral will be too difficult and microchipping is too difficult to police, is expensive and people are unlikely to follow through checking and returning domestic pets.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P016.1	Brenna Gould	I would like to protest the proposal for cats to become pests in Otago. I fear that making them pests will endanger pet cats and that feral cats could be subject to cruel deaths. Please don't include cats in your pest policy.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P017.1	Joanne Jones	Oppose certain specifics in the plan. The term 'feral cat' and ridding all cats deemed feral, bearing in mind many domestic cats/household pet cats in New Zealand are not microchipped and euthanising and labelled them a 'pest' is completely inappropriate. Cats have approximately a 10% hunting success rate each time they hunt and rally aren't a prodominant issue. they should NOT be included in the pest management scheme.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P019.1	Ashlea Chapman	I oppose the decision to make feral cats classed as a pest. If this goes ahead then people will be harming and killing people's pets either through shooting or baiting. There should be more funding for the spaying and neutering of wild cats and where appropriate rehoming or humanly euthanised.	Remove feral cats from the Plan and provide more funding for spaying, neutering, rehoming or humane euthanasia.	Feral Cats	Reject	There are no rules that require the culling or microchipping of cats in the Plan. There are no region wide objectives or rules regarding feral cats, nor are there any rules that require pet cats or stray cats to be managed in any way. Feral cats are included in the Dunedin site-led programmes only and the impacts feral cats have on biodiversity is described in Table 25. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this plan of action (such as trap, neuter, release, microchipping, free or subsidised desexing, etc). ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P020.1	Angela Newby	I oppose inclusion of 'feral cat'	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P021.1	Meg Bennett	The idea of killing freak cats is unthinkable... Especially as this has not been made aware to the general public. My cats go outside... Will they be taken as "feral" they are well loved and cared for, neutered and very much loved... This is unbelievable that you would try to pass a bill without letting the public know. I'm so ashamed of our municipal government...	No specific relief requested.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1. Additionally, the Plan was publicly notified for a period of six weeks in November and December 2018, drop-in sessions were held in the Dunedin site-led areas, and a summary of the Plan and Strategy, along with a submission form to encourage feedback was sent with local papers to letter boxes in Otago in November 2018.
P022.1	Hannah Lowe	I oppose the inclusion of 'feral cat' in the pest category!	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P023.1	Alison Conroy	I oppose the inclusion of feral cats in the regional pest plan. If it is imperative that cats be addressed in the plan, it should be that funds are given to organisations like Cat Rescue Dunedin who can help these animals humanly.	Remove feral cats from the Plan or provide funds to organisations to help cats humanely.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P025.1	Tessa O'Brian	Feral cats should not be classified as pests as it risks pets being killed. Instead focus more efforts on accessible neutering	Remove feral cats from the Plan and focus on neutering.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P026.1	Ambre Coste	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this plan of action (such as trap, neuter release, microchipping, free or subsidised desexing, etc). ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P027.1	Marijn Kouwenhoven	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P028.1	Jan Maree Liggins	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P029.1	Rebecca Stewart	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P030.1	Brittany Jane Whelan	I oppose feral cats being on this pest list. They should not be there as this gives people a license to go out and shoot then which is not okay. Often these are peoples pets.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P031.1	Kelsey Scheurich	Pest Classification: I oppose feral cats being included in the pest classification, as it opens the door to people who deliberately target other peoples pets with the excuse of "I thought it was feral". Actual feral cats can be removed via trapping, then neutered, ear clipped, and relocated/rehomed to reduce impact on certain areas. I propose feral cats are removed from pest classification.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P032.1	Davina Mae Hopgood	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P033.1	Nicole Perry	Cats and feral cats are not pests and should not be classified as pests	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P034.1	Alice Mary Donegan	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P035.1	Kirstin Dana	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P036.1	Fiona McCormick	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P037.1	Jason Lawrence	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P038.1	Olivia Rose Reed	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P039.1	Kayla Boland	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P041.1	Melissa Gold	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan.	Feral Cats	Reject	The Plan does not include rules regarding feral cats in Queenstown. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this. ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P042.1	Olivia Reinhardt	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P041.1.
P043.1	L. Hirst	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P044.1	Helen Loudon	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P045.1	Paula Jones	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P041.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P046.1	Denise Greer	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P041.1.
P047.1	Julia Milley	I OPPOSE what the council is proposing to put forth. When I first started work at Central Art Gallery 25 years ago I would frequently see cats and kittens running across the village green in the evenings. I doubt there were many skip bins behind the pubs and restaurants that didn't have strays rummaging through them. Back then I believe the council would employ a man to 'remove' the animals and dispose of them at the vets. When the Queenstown Cat Rescue was established the problem for the council disappeared. No longer did the taxpayer have to pay for the removal and disposal of the cats and kittens as we gathered them all up, tamed and desexed them and put them all into foster homes. Many of the hotels were happy to have their very own pet cat which was desexed, fed and loved. Izzy from New World is one example. Izzy was a little wild cat that has been tamed and is now a New World Icon proudly strutting her stuff as a meet and greet kitty at their front door. As it stands at the moment we have literally cleaned up the town area and if any cats pop up you can bet a concerned member of the public will contact us and we will collect the kitty asap. We are a strict NO KILL and to find that wild and unsocial cats are now going to be targeted as pests is abhorrent. We are happy to continue in what we are doing without any cost to the council and the ratepayer but please leave the cats to us to deal with.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P041.1.
P048.1	Nina Jensen	I am in opposition. I feel that the 'predator free' bandwagon is more about appealing to the popular vote of the moment and would like to see this huge sum of money being invested into something like creating affordable housing. In addition...Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P049.1	Michell Sheral Reddy	Please don't shoot feral cats or exterminate on site when there are charity in Dunedin carrying out capture neuter and return projects.	No shooting or extermination of feral cats.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P050.1	Ashleigh Beales	Please remove feral and stray cats from the 'pests' target by the Pest management plan. Although cats do pose a threat to our native, there are better ways to manage this. For example, TNR - trap, neuter, return stops feral and stray cats from breeding. Working with cat owners to educate and encourage them to be responsible owners and keep cats inside, use a bird safe collar and a bell as well as desexing so their are less unwanted cats in Dunedin, protecting the bird population. Lumping cats into a general 'pest' category will alienate cat owners and has the potential to harm non-stray, non-feral and companion cats.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P041.1.
P051.2	Ashleigh Beales	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this I suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P052.1	Krista Baker	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P053.1	Jess Mead	I am concerned that including "feral cat" in the proposed pests section may be quite difficult to control. As in how will you determine what a "feral cat" is? We try to keep our big boy inside at night time but I'd hate to think if he did get out and go roaming, what's stopping anyone thinking he is "feral".	Remove feral cats from the Plan.	Feral Cats	Reject	The request to remove feral cats from the Plan is recommended to be rejected. However, a definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P054.1	Susan Mottram	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P055.1	Fumie Ichikawa	I'm definitely OPPOSE to this pest proposal. I've been helping QT Cat rescue since they started. I've been working in Arrowtown for 15 years. I can see the number of wild cats dropped down in Arrowtown. Nothing shouldn't be killed. It's all human being faults to have more abandoned/wild cats around here. We should have bylaws like owners have to have cats micro chipped and desexed instead killing them.	Remove feral cats from the Plan and introduce bylaws to microchip and desex.	Feral Cats	Reject	The Plan does not include rules regarding feral cats or stray cats in Queenstown or Arrowtown. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this. ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P056.1	Tania Cassidy	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P057.1	Amy Scott	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P058.1	Ashley King	Dear Otago Regional Council, I am writing to you in strong opposition regarding listing Feral cats as a pest. I believe there are better solutions to turn to before poison or bullet. As its an offence to most New Zealanders as there are over 1.4million domestic cats in New Zealand. They are a pet, someone you love dearly. I do believe there are some mistreated out there but they only need love and a second chance. I don't see us listing dogs as pests when they walk on the paths, beaches and parks without a leash (with no owner in sight). To list cats as pests is an offence to many people's culture. I believe a conversation and encouragement on how to take care of your cat, and the significance of adopting one would be a much better solution than to encourage the culling of an animal we very much consider a pet. I believe we can have birds and a thriving eco system, we just don't have to keep blaming everything on all cats. In Wellington the Tui population has doubled since 2011 and a fair sum of wellington residents still have pet cats. The answer is in how we take care of them, the ones who are neglected are the ones who sadly get given this stigma, they are hungry and need a proper home not poison. I believe there should be opportunity to team up with rescue initiatives to rehouse suitable stray cats through this way they are spayed and given to a good home. if they arent suitable for rehousing and are sick etc they do have a right to have a more humane way of leaving this sometimes horrible world, i.e. Euthanasia. 1080, bullets, and other horrible culling is something I strongly oppose. We can do better.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P059.1	Clare Waddick	I oppose the ORC proposal to include feral cats as pests. The difference with cats compared to your other list of pests is that most cats are domesticated pets. If included as pests then there will be mistakes. Loved pets will be mistakenly killed. There will be heartbreak and backlash against ORC and you will never have more than minority support. I know this will happen because it has already happened to our family where our loved cat was caught and killed in a trap set for possums. Strangulation via a string trap that ORC seems legal! The trapper felt terrible seeing our grief and said they would never trap again but if you label cats as pests it will be more common place. There are also different levels of wild. I feed a semi wild spayed cat that lives under our house in turn taking care of rats and mice for us. Queenstown cat rescue spayed and released several cats in our area and where we once had a stray and wild cat problem now we don't. Over time the cats have died of natural causes and without breeding the population has decreased. You should work with this organisation not against them! It's also debatable how much of a problem feral cats are as far as our bird population goes because in preference they go for the easier to catch prey ie rats, mice, rabbits. Less cats will mean more real pests. Also if the town cats are kept under control via cat rescue organisations there won't be the spread to country areas. Please reconsider, there are other better ways to deal with feral cats. Ways that the general public will support.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P060.1	Lisa Cassidy	That feral cats are NOT included in the proposed Pest Management Plan. I oppose this. I suggest trap neuter release	Remove feral cats from the Plan and focus on a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P061.1	Graham Michael Darracott	I am concerned about the proposed ability of people to shoot feral cats. We have rescued 7 cats, had them fixed and they now live in our area. We feed them. They have areas where they can sleep but at times choose to go elsewhere. We also feed birds and we hardly see any kills at all. They did not ask to be born and are not a threat. Why should someone be allowed to shoot them because they may have temporarily strayed? We used to have a mouse and rat problem. Now we don't. That is all I need say.	Remove feral cats from the Plan.	Feral Cats	Reject	There are no rules in the Plan regarding stray cats. See response to submission P011.1.
P063.2	Aries Hodges	Feral cats should not be included as a pest animal. Over the last 9 years Queenstown Cat Rescue have proven that their trap-neuter-release program has reduced the feral cat population significantly on a massive scale. Their trap-neuter-release program is a humane approach to addressing community cat populations, both stray and feral. It saves cats lives and is effective. It also improves the lives of cats, addresses community concerns, reduces complaints about cats, and stops the breeding cycle. It also improves the co-existence between outdoor cats, and humans in our shared environment. Scientific studies and communities with trap-neuter-release programs are proof that this program reduces and stabilises populations of community cats.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P041.1.
P077.1	Sharon Apfel	The eradication of cats. The proposed killing of all or any cats is in itself flawed. Cats are natural predators and are pest control at their best. Eradicating cats also ensures you eradicate pet cats (which is happening and totally unacceptable). Pest free NZ is a flawed and dangerous ideology, which is drastically irresponsible and harmful to the ecology of our once ethical country.	Oppose the eradication and killing of cats.	Feral Cats	Reject	The eradication of cats is not proposed.
P080.1	Tracy Jenkins	I am writing to oppose putting cats down as pests. A growing population of public seem to think all cats should be got rid of not just feral cats. This is leading to pets being killed often in inhumane manner. Our loss of birdlife is not due to cats. Infrastructure and humans make up the biggest problem in my opinion.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P081.1	Rebecca Taylor	I would like to voice my strong opposition to the inclusion of cats as a pest. Cats are NOT pests and many loved pets will be placed at risk if they are termed as one. There are other options for truly wild cats such as trap neuter and release programmes or even taming them for pets. I work with cat rescue dunedin and they do amazing work with both stray and wild cats everyday.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P082.1	Wendy Lee	I am making a submission against inclusion of 'feral cats' into pest category by the local ORC. It is already mentioned before Otago Regional Council Proposed Pest Management plan and Biosecurity Strategy and I would like to reiterate the importance of the issue. My cat which is microchipped and neutered does look like a feral cat and is NOT a feral cat. He is mistaken many times for it. So, I'm against the inclusion of feral cat as pest.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P083.1	Marrienne Gail Walton	I do not support the provision of classing feral cats as pests as this leaves it wide open for pets to be "culled" in residential areas. There are already incidents of this happening throughout the country and the Plan isn't in place yet.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P084.1	Andrea Haylings	I completely oppose your plan on how to control feral/stray cats. There is far too big a room for error and many owned and beloved pets will suffer with their lives. In parts of Australia they have implemented similar laws, with often horrible consequences. Cats being shot and not dying immediately (they hide and die in an anguishing way or are luckily found by someone and treated for injuries) Peoples pet cats dying because they are judged stray or feral by obviously uneducated people. There are better ways to control a population of cats. TNR is fantastic and often you can trap, rehabilitate and rehome healthy animals.	Remove feral cats from the Plan and focus on a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P085.1	Sandra Howell	I oppose the guidelines of having feral cats on the pest list there must be other ways around this species being on the list if the orc got involved with groups such as cat rescue that can help sort around this species problem out by other means	Remove feral cats from the Plan and support cat rescue groups.	Feral Cats	Reject	See response to submission P013.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P087.1	Sarah Wonders	Cats shouldn't be included in the submission how do you know the difference between a ferrel and a tame someone could have tamed a feral cat and made it a pet that's just cruel and unnecessary.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P088.1	Maria Joy Crawford	I strongly oppose the inclusion of 'feral cat' in the pest category. In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Remove feral cats from the Plan and focus on eradication and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P058.1.
P089.2	Jenea Te Whare	Please look at supporting local cat/animal rescues who work effortlessly getting these animals homes and love rather than your suggested proposal	Remove feral cats from the Plan and support animal and cat rescue groups.	Feral Cats	Reject	See response to submission P013.1.
P091.1	Kasey Willis	Cats are NOT pests.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P011.1.
P092.1	Lesley Procter	Cats must not be included in the new pest management plan. If this happens, domestic cats will become targets (whether intentional or unintentional) and other pest animals currently controlled by cats such as rats will increase in population.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1. Although it is acknowledged that cats control rodents, the impacts feral cats have on biodiversity in New Zealand is well documented and other forms of rodent control can be used in the Dunedin site-led areas to manage rodent problems. The Panel notes that ORC staff can provide information and support to landowners on rodent control.
P093.1	Lynne Steiner	I do not support domestic cats being classified as 'pests'	Domestic cats should not be included in the Plan.	Feral Cats	Accept	Domestic cats are not proposed for inclusion in the Plan.
P094.1	Roy Smith	Well done on expanding the pest animals considerably and being brave enough to include feral cats. They are as destructive as stoats and kill for fun.	Support inclusion of feral cats.	Feral Cats	Accept	The submitter supports the inclusion of feral cats in the Plan.
P096.1	Jacqueline Margaret Lang	I oppose the inclusion of feral cats in the pest category.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P099.1	Kathryn van Beek	Regarding cats, I strongly believe that 'trap, neuter, release' is the best option and that this should be backed up with intensive pet owner education and the removal of any barriers for people who need to get their cats neutered. I believe that cat neutering should be free and if possible, mobile. I used to think that we should rely on owners to be responsible but we can see that this is not happening, so I think we need to remove as many barriers to neutering as possible and cost / travel / time would certainly be some of these barriers. If we are serious about reducing the cat population we should also phase out cat breeding with a complete ban on it within ten years. I have personally raised thousands of dollars for Cat Rescue but it is really wrong to leave cat control up to volunteer organisations and rely fully on local citizens to step up. The council also needs to play its part and FUND these organisations. I for one am happy to pay more rates to get increased services like this. There is no way to mark out pet cats from ferals - neither of my two cats (both rescue cats, both neutered, both micro-chipped) will leave a collar on for more than 24 hours. In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Control of feral cats should focus on funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P100.1	Beverley Anderson	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P101.1	Allison Hunter	I am against the Proposed Regional Pest Management Plan that includes feral cats. I am opposed to feral cats being included in eradication plan because of the danger it would be to people's pet cats. As I live on the edge of bush land that could be a site under this plan, I am not comfortable with the danger it could put mine and other neighbors cats in danger. So I say a definite "NO!!" to having feral cats on the list for the new 'Proposed Regional Pest Management Plan'!!	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P102.1	Wendy Ann Hodgson	Feral Cats should not be included as a Pest. Over the past decade or so Rescue charities nationally along with southland Queenstown Cat Rescue, Cat Rescue Dunedin and Furever Homes Invercargill have proven their TNR (Trap, Neuter, Release) programmes have reduced the feral cat populations on a significant scale NATIONALLY. TNR is the only humane way to approach community cat populations. Through no fault of their own either abandoned by humans, or dumped along the road side as kittens, or neglected and left behind do not deserve this category being considered. Scientific Study and those communities who take on TNR in their communities are living proof these methods are working by reducing and stabilising populations of unfixed and unsocialised animals let down by the human population who are to blame. These charities sign trust deeds which state they are a NO KILL CHARITY. In section 6.5 of the proposed Otago Regional Pest Management Plan, you suggest the site-led management of the Otago Feral Cat population. I would only ever support in that i would far prefer as would the named charities to see a much more support for humane and socially acceptable solutions, which has to be TNR (Trap, Neuter, Release) in other instances rehoming and adoptions for those that they tame through foster care. For this i suggest you contacting and also funding, charities such as Cat Rescue Dunedin, Queenstown Cat Rescue and Furever Homes Invercargill Charities who are making the most incredible in roads in getting populations under better control and management. We/they also emphasize a far more positive education programme regarding the neutering and speying of cats not fixed with more education in schools the looks for humane treatment of animals as against the programmes now in place in some parts to NZ whom are currently encouraging and inviting children to kill certain species they catch in bottom of gardens. Gareth Morgan Foundation has been detrimental and influential encouraging 'cowboy hunters' who too hate cats for unacceptable reasons and are already showing on their own Facebook pages their wanton trapping and killing of any cat which ventures into their space.	Remove feral cats from the Plan and fund charities who address the feral cat issue through education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P111.1	Emma Paul	I wish to oppose the inclusion of feral cats as I do not believe they have an impact on the environment. They are not harmful organisms that need to be controlled. I see the plan as 'a licence to kill' and I do not think it is the right way to empower individuals and communities. Instead it enforces the killing mentality that is spreading through local government departments and filtering out into the mainstream. I do not think these animals will be killed humanely, and who will be present to witness it is done so? It will be impossible to monitor. The publics perception of these animals will change and they will be killed mercilessly and I am in no doubt, by barbaric methods. The plan wants to fall in line with other council management plans around NZ. Why do we have to follow the leader, when the leader uses faulty science to promote the misleading goal of NZ becoming predator free by 2050. It is an unachievable goal. All animals have their part to play within the food chain. Genocide of a single species will ultimately affect other species survival. Cats can become feral through no fault of their own. They can be dumped and abandoned by people. They can become lost, they could be someone's treasured pet. They do not deserve to be put on the hitlist and killed for wandering into the wrong areas.	Remove feral cats from the Plan. Focus on a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P112.1	Jodi Benson	In section 6.5 of the Proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution which is TNR (Trap Neuter Release). For this I suggest contacting and funding charities such as Cat Rescue Dunedin which currently already do their best in lowering the feral cat population in Dunedin. I do not believe there are other sustainable methods which would not also target pets. I also suggest that education regarding neutering pets should be increased leading to regulations imposing their spay and neuter, much as with dogs.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.
P120	Bruce Collier	Classification of the entire species Felis Catus as a "pest" would endanger domestic cats by giving license to the rednecks and sadists in the community. The resources (time and money) required to deal with feral cats as a "pest" should be used for more humane methods e.g. Trap-Neuter-Release already employed by volunteer groups throughout the country. In ultra sensitive ecological areas, culling of cats should be by humane methods and any "site led" policies should mandate this.	Remove feral cats from the Plan. Focus on a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P126.3	Logan Cowdell	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P126.8	Logan Cowdell	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.	Feral Cats	Reject	See response to submission P128.3.
P128.3	Rebecca Bell	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 of 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	Support for the inclusion of feral cats in the Dunedin site-led programmes is acknowledged. ORC has not carried out or been involved in the control of feral cats to date, and staff consider a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in these areas. As this is the very early stages of ORC being involved, the Panel considers that working alongside the community will achieve the desired outcomes. This is especially important where there are so many community members concerned about animal welfare and unintended consequences for their pet cats. As the focus of the site-led programmes are to support in the management of feral cats, and not domestic or stray cats, rules regarding 'pest cats', requiring microchipping, and feeding cats or establishing cat colonies in public places or without the express permission of the land owner are not recommended.
P128.8	Rebecca Bell	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.	Feral Cats	Reject	See response to submission P128.3.
P129.1	Katryn van Beek	Regarding the management of cats, I support the position of Cat Rescue Dunedin. TNR (trap, neuter, release) is humane and will, over time, reduce the stray cat population. More importantly, I believe it should be much easier for people to neuter their pets. Clearly people are not acting responsibility when it comes to neutering their pets or we wouldn't be in this position. I suggest making cat neutering free, and maybe even making it mobile - just making it as accessible as possible for people to neuter their pets to ensure that we do not end up with even more stray cats. At the end of the day, when it comes to pests, the real problem is humans!	Support trap, neuter, release. Cat neutering should be free.	Feral Cats	Reject	See response to submission P019.1.
P130.3	Rafferty Parker	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 of 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P130.8	Rafferty Parker	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.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P131.1	Teena Ann Joyce	4.1 Table 2 Organisms declared as pests I do not support the full list of animals declared as pests. I suggest council accepts the partial list of animal pests listed in the plan but EXCLUDES feral cats especially if they are near residential or suburban areas. Description of Feral cats p.64 I DO NOT support the inclusion of feral cats for site-led control. Cats, are one of the most popular domestic pets in New Zealand. 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, however any live trapped cats should be held and notification advertised locally so that people missing their pets have the opportunity to retrieve/claim them. Controlling cats near populated areas, such as Broad Bay and Portobello on the Otago Peninsula, is difficult but given the number of people in that area I believe there is an obligation to be fair to people in the area who may not already have their pets microchipped. Obviously requiring all owned cats to be microchipped protects them from being incorrectly identified as unowned cats, but a lead in period would need to be provided and advertised for people to organise this for their pets (if this was to be the action that was taken). 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. There are several cat colonies in and around Dunedin and surrounding areas, these colonies can help with reducing mice and rats. These should not be considered pest cats.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P132.1	Jesse Keable	I do not support the list of animals declared as pests including feral cats, they should not be on that list	Remove Feral Cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P132.3	Jesse Keable	I do not support the inclusion of feral cats for site-led control. Cats are not destructive to our native wildlife as a majority are larger than the cats. Cats are not an apex predator in nz, there are different ways to control them. Such as catching them, neutering them, and then releasing them. This method has shown better results in australia.Feral cats and domestic cats can exhibit similar behaviours and therefore this pest control plan will kill many innocent and loved pet cats. Microchipping may be the most definitive way to differentiate between domestic and feral but that doesn't stop domesticated cats from being harmed. Requiring all owned cats to be microchipped is ineffective and difficult. I would like Council to rename "feral cats" to "cats" to ensure all cats aren't innocently killed.	Opposes inclusion of feral cats for site-led control and supports trap, neuter and release. Seeks the plan is amended from 'feral cats' to 'cats'.	Feral Cats	Reject	See response to submission P019.1.
P132.9	Jesse Keable	Cats are not a pest, as long as they are fed they have no need to hunt birds, but even as a species that has been domesticated for years naturally they don't tend to hunt anyway, they search out humans for food. You can't put all the blame of native animals dying on cats, there are more issues like cars, bugs, water pollution, diseases, etc. Dogs have been known to kill native birds why don't you label bad owners as having a "pest dog".	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P133.3	Monika Divers-Sidor	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P133.8	Monika Divers-Sidor	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.	Feral Cats	Reject	See response to submission P128.3.
P134 .1	Charlene Gell	I do not support the inclusion of feral cats. There are organisations in our community working on trap, nueter, release programmes which will start to reduce populations.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P135.3	Noeline Bourke	I do not 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.	Does not support the inclusion of feral cats in the plan. Amend 'feral cat' to 'pest cat' and require micro-chipping of pet cats and manage pest cats.	Feral Cats	Reject	See response to submission P128.3. A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1. It is noted that this submission may be an error as the submission both supports and opposes the inclusion of feral cats.
P135.5	Noeline Bourke	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 not like Council to include pest cats in Plan Rule 6.5.4.1.	Support for site-led programmes on the Otago Peninsula, with the exclusion of feral cats.	Feral Cats	Reject	The submission is not clear regarding the relief requested. There are no rules in the plan regarding 'pest cats' or abandoning cats.
P135.6	Noeline Bourke	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 not like Council to include pest cats in Plan Rule 6.5.5.1.	Support for site-led programmes on the Otago Peninsula, with the exclusion of feral cats.	Feral Cats	Reject	The submission is not clear regarding the relief requested. There are no rules in the plan regarding 'pest cats' or abandoning cats.
P135.8	Noeline Bourke	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 not 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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P136.3	Marty Roberts	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P136.8	Marty Roberts	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.	Feral Cats	Reject	See response to submission P128.3.
P137.3	Dell McLeod	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. I would also like ORC to help both with people catching stray cats and with the identification and disposal of them. Currently there is very little help with either of these, costing the people wanting to do this. Due to the amount of damage that cats do, help with trapping and killing feral cats will go a long way toward the control of them.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip". Seeks additional support from Council for identifying, catching and disposing of stray cats.	Feral Cats	Reject in part	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P137.8	Dell McLeod	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P138.3	Jennifer Thomas	All cats should be caught in a humane way and delivered to Cat rescue to enable them to be assessed as to whether or not they are feral or tame cats. Feral cats are able to be treated in a way as to turn them into great pets.	All cats should be trapped and delivered to Cat Rescue for assessment.	Feral Cats	Reject	The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this. ORC will specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P139.3	Davina Hopgood	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip". [it is noted that this is likely submitted in error - see submission points 139.6-8].	Feral Cats	Reject in part	See response to submission P128.3.
P139.5	Davina Hopgood	NEVER supporting the site-led programme for the Otago Peninsula and NEVER support the objectives, principle measures and rules set out in table 26 to accomplish this. DONT KILL CATS HOW DARE TO EVEN THINK OF EVEN SUGGESTING IT. WHAT THE HECK! I CAN TELL YOU NOW FOR SURE THERE WILL BE PEOPLE PUT HERE IN NZ THAT ARE FURIOUS ABOUT THOS STUPID BS!!!! DONT EVEN TRY !!!!'	Oppose inclusion of feral cats in site-led programmes for the Otago Peninsula.	Feral Cats	Reject	See response to submission P011.1.
P139.6	Davina Hopgood	CATS NEVER PESTS!! AND DONT TRY AND CHANGE MY WORDS!	Oppose inclusion of feral cats in site-led programmes for the West Harbour – Mt. Cargill area.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P139.7	Davina Hopgood	LEAVE CATS ALONE!!!'	Oppose inclusion of feral cats in site-led programmes on Quarantine and Goat Islands.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P139.8	Davina Hopgood	DONT EVEN TRY KILL THOSE INNOCENT CATS.	Oppose inclusion of feral cats in the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P140.3	Just Doi	I do not support the requirement that cats be either microchipped or killed.	Oppose inclusion of feral cats in the Plan.	Feral Cats	Reject	The Plan does not require microchipping of cats, nor does it require people to kill cats.
P141.3	Josh Norton	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P141.8	Josh Norton	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.	Feral Cats	Reject	See response to submission P128.3.
P142.3	Craig Freeman	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P142.8	Craig Freeman	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.	Feral Cats	Reject	See response to submission P128.3.
P143.3	Anna Clark	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P143.8	Anna Clark	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.	Feral Cats	Reject	See response to submission P128.3.
P144.3	Jared Oliver	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P144.8	Jared Oliver	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.	Feral Cats	Reject	See response to submission P128.3.
P145.1	Debbie Munro	Table 2 Organisms declared as pests - No, I dont support Cats being in this as its very hard to tell a very scared cat in a trap to a feral.	Exclude feral cats as pests in the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P145.3	Debbie Munro	You take out the apex predators you will have a population explosion of less predators. What will you do then. Also its well known some m/chipped dont work sometimes. Would like to remind you also, its illegal in NZ to knowingly kill someone pet. You must ensure (150%) they cat is NOT owned by anyone, and also legally you must hold a cat for 7 days to ensure its not owned by anyone. After I trapped one of my cats a few years ago, she went beserk! I know know some domestic cats will act like ferals. I also trap ferals, which I humanly destroy.	No specific relief.	Feral Cats	Reject	See response to submission P013.1.
P146.3	Karin Johnsson	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 of 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P146.8	Karin Johnsson	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.	Feral Cats	Reject	See response to submission P128.3.
P147.2	Tina Kapohe	I do not support the description of feral cats. Rather cat rescue organisations should be supported in trapping, desexing and rehoming	Remove feral cats from the Plan and focus on a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
P147.4	Tina Kapohe	I don't appreciate this auto filling of these boxes. I do not support interference of colony cars on any level	No specific relief sought.	Feral Cats	Reject	The Plan does not include rules regarding cat colonies.
P148.4	Rusty Knight	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. using chips in private cats fine but once again control should be allocated to local trappers and they should be advising people to keep cats in side publically no 1080 please	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip". Tender pest cat control and oppose use of 1080.	Feral Cats	Reject in part	See response to submission P128.3.
P148.9	Rusty Knight	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P149.3	Matthew Peppercorn	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P149.8	Matthew Peppercorn	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.	Feral Cats	Reject	See response to submission P128.3.
P150.3	Julia Stewart	I DO NOT support the inclusion of feral cats for site-led control - you mean mass murder. Cats, whether owned or unowned, are highly skilled hunters and very destructive to our native wildlife - this is debatable. I guess you have used corrupt "science" to come to such silly conclusion. "Cats are an apex predator in New Zealand, meaning that if humans don't control them then nothing else will." BS. Cats have been living on earth for thousands of years and are part of the eco-system that humans are so effective in destroying. Stop the idiocy, please. Not everyone in this country is brainwashed, indoctrinated idiot. "Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult." You got it absolutely wrong! You must learn the difference between feral cats, stray cats and domesticated cats-pets. Feral cats are not domestic cats! This is why they are called feral. They live in the wild and are not accustomed to humans. You need someone with higher IQ in you team to help you out.	Opposes inclusion of feral cats in the Plan.	Feral Cats	Reject	See response to submission P013.1.
P150.5	Julia Stewart	Cats cannot be included in the "pest" category for the simple reason that they are PETS!!! We have been and will be sharing our lives, our homes with them. For many people in different walks of life and different situations, cats are family and provide treasured, gentle companionship and much needed stress relief. I suppose this is a bit too hard for your little brains to register and comprehend. Still, try, it is important. NZ until recently was known as a nation of animal lovers and protectors. Sadly, the truth is in the opposite.	Opposes inclusion of feral cats in the Plan.	Feral Cats	Reject	See response to submission P011.1.
P150.8	Julia Stewart	You cannot prevent people feeding cat colonies. If you do, you will be in breach of the principals enshrined in the Animal Welfare Act 1999, which is the supreme legislation, which you must honour when creating bylaws.	Opposes inclusion of feral cats in the Plan.	Feral Cats	Reject	The Plan does not include rules regarding cat colonies and is not inconsistent with the Animal Welfare Act 1999.
P151.3	Martin Broadbent	I DO NOT support the inclusion of feral cats for site-led control. Cats, whether owned or unowned, are NOT highly skilled hunters or very destructive to our native wildlife. Cats are NOT an apex predator in New Zealand, meaning that humans don't need to control them. 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 NOT 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 NOT difficult if you are unable to clearly identify an owned or unowned cat. NO CATS OWNED OR UNOWNED SHOULD NOT BE CONTROLLED. Requiring all owned cats to be microchipped DOES NOT protect them from being incorrectly identified as unowned cats. I would NOT 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 NOT be controlled. I would like Council NOT to define a pest cat as "a cat without a registered microchip". This DOES NOT allow pest cats to be managed at sites where owned domestic cats may be present. IT WILL GO VERY WRONG A INNOCENT CATS WILL BE KILLED.	Opposes inclusion of feral cats in the Plan.	Feral Cats	Reject	See response to submission P013.1.
P151.5	Martin Broadbent	I DO NOT support the site-led programme for the Otago Peninsula and DO NOT support the objectives, principle measures or rules set out in table 26 to accomplish this. There is no mention of releasing or abandoning cats into this area. I would NOT like Council to include pest cats in Plan Rule 6.5.4.1.	Opposes site-led programme for the Otago Peninsula.	Feral Cats	Reject	See response to submission P013.1. The Plan does not contain rules regarding abandoning cats or 'pest cats'.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P151.8	Martin Broadbent	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 IDO NOT think this is an important inclusion in the plan. PLEASE STOP ACCEPTING ALREADY TYPED OUT SUBMISSION FORMS FROM THE PREDATOR FREE 2050 page as this is deceptive. People like Gareth Morgan should not be allowed to influence people's thoughts. 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." Is disgusting and I suggest ORC DOESNT include a similar provision in their RPMP. The Council should NOT add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Opposes inclusion of feral cats in the Plan.	Feral Cats	Reject	See response to submission P013.1. The Plan does not contain rules regarding abandoning cats or 'pest cats'.
P152.3	Rosalie Goldsworthy	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P152.8	Rosalie Goldsworthy	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P154.1	Sarah McArthur	possums rats etc that are a direct threat to our native wildlife should be destroyed but cats should be checked for chip and returned and fined any other cats should be fixed and relocated to places to be adopted and if places are full then should be culled and all cats in places should have escape proof fences	Focus on a trap, check and release programme for potential feral cats.	Feral Cats	Note	See response to submission P026.1.
P154.3	Sarah McArthur	Cats should be checked for microchips and returned to property's all cat owners should be council bylaws be microchipped have all immunisations and fixed if they are not registered breeders and the properties must be fully cat proof so they cannot leave the property's any cats found should be given to rescues to be fixed microchipped immunised and adopted to responsible homes that can contain the cats any other Cats should be offered no no less than 3 other rescues from different regions before being culled	Focus on microchipping and a trap, check and release programme for potential feral cats.	Feral Cats	Note	See response to submission P026.1.
P154.5	Sarah McArthur	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. I am a ex Portobello resident who understands the importance of pest control but who also feels there needs to be more responsibility and accountability for cat owners (held to same standards as dog owners)	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P155.1	Jo Standley	I support the list of animals declared as pests including mustelids, possums and rats. I do not think feral cats and hedgehogs should be included,	Support for the list of animals declared as pests, with the exception of feral cats and hedgehogs	Feral Cats	Reject in part	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P155.3	Jo Standley	I do NOT support the inclusion of feral cats for site-led control. While microchipping is the most definitive way to differentiate between an owned and unowned cat it is not 100% reliable and can never totally protect them from being incorrectly identified as unowned cats.	Exclude feral cats from site-led programmes.	Feral Cats	Reject	See response to submission P013.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P157.3	Dylan Robertson	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P157.8	Dylan Robertson	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P158.3	Lucy Bell	Description of feral cats: CATS SHOULD NOT BE INCLUDED	Remove cats as a pest animal in the Plan.	Feral Cats	Reject	See response to submission P011.1
P159.3	Shaun Templeton	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P159.8	Shaun Templeton	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P160.3	Fiona Peat	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P160.8	Fiona Peat	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P161.3	Bonnie Wilkins	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P161.8	Bonnie Wilkins	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P167.1	Rachel Allan	I choose not to support the regional pest management plan, in relation to feral cats being labelled pests with the possibility of family pets accidentally being impacted.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P170.1	Bella Innes	I strongly believe cats should NOT be on the pest list. 'Feral' cats are NOT living in suburban areas. Cats who are living in these areas are most likely all lost, dumped or may have been bred in these conditions but are not feral. There are organizations like Cat Rescue who trap and catch these cats and can put them to sleep if they are too wild and re home the rest. Marking them as 'pests' will encourage some individuals to kill or harm them when they could be somebody's pet. It will also encourage people to have traps etc. that are inhumane and cruel. I understand protecting the wildlife but a lot of these cats are kept by residents of the area they are visiting or steal food rather than catching birds.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P171.1	Stephanie De Rooy	I disagree with the proposal. A lot of cats aren't interested in birds - they are more interested in killing rodents which are more of a pest and carry far more diseases than a well looked after cat.	No specific relief sought.	Feral Cats	Reject	See response to submission P013.1. Although it is acknowledged that cats control rodents, the impacts feral cats have on biodiversity in New Zealand is well documented and other forms of rodent control can be used in the Dunedin site-led areas to manage rodent problems. ORC can provide information and support to landowners on rodent control.
P172.1	Abigale Park	I am submitting a decision in conjunction to the proposed pest control plan involving cats . I do not think cats and or feral cats are a pest , with proper management they can be a help to society than a menace . Cats which are pets should not be classified as a pests as such , as they are people's property , not just another number to kill on the list to get rid of . I think there needs to be other plans put in place for feral cats that are wild . My decision is against putting down cats , as to say they are pests . But to come up with new ideas on how to deal with wild and feral cats which are a problem to wildlife and other protected animals .	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P173.1	Jethro Schreuder	I have concerns about 'feral cats' being included in the pest management plan. Without a real definition of what defines a cat as feral. How will the ORC ensure that the animals it targets are actually feral? Many cat owners do not have their cats collared or micro chipped and this is not a requirement for people who wish to own a cat. If the ORC targets cats, especially on the Otago Peninsula where there is a lot of residential homes, they will endanger peoples much loved pets. Feral cat control should be done ONLY far from places of residence and then perhaps through non-lethal means until it is certain that the animal is feral.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P174.4	Helen Clarke	I would also like to see the ORC working with District Councils towards instigating domestic cat control along the lines of present dog control legislation.	Instigate domestic cat control measures along the lines of present dog control legislation.	Feral Cats	Reject	See response to submission 128.3.
P176.1	Nichola Macarthur	Feral cats are not pests. In areas where birds, cats and rats live the cats will eat the rats. Rats are responsible for decimation of bird populations and eat the eggs preventing new fledglings from replenishing populations. Please remove feral cats from the pest list.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1. Although it is acknowledged that cats control rodents, the impacts that feral cats have on biodiversity in New Zealand is well documented and other forms of rodent control can be used in the Dunedin site-led areas to manage rodent problems. ORC can provide information and support to landowners on rodent control.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P177.1	Emerald Meade	Section 4.1 - Feral Cats I strongly oppose the submission to cull feral cats My reason - It is more humane to trap neuter and release. Many cat lovers including myself fear that their beloved pets may be mistaken for a "feral" and be killed. Cats are also responsible for keeping the rodent population down. Feral cats are not pests. Nor are our family pets - and if this goes through the lines may be blurred between our pets and feral cats. Please let empathetic caring organisations like Cat rescue Dunedin continue their hard work to decrease the cat population in Dunedin, and not let this turn into a witch hunt against innocent cats! Because it is not their fault, but the fault of humans that cant care for an animal responsibly enough to neuter or spey. Please do not include feral cats in this pest management plan!!	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P178.1	Leanne Ross	Feral cats have been an issue for us in both houses we rented before building in 2 different areas of Dunedin, before building our home. They spray, breed, defecate over paths and it is both unsafe and unhygienic for children. An unhealthy national obsession with these animals as pets appears to blind people's logic to the need to control the wild versions in order to protect the native wildlife and give better quality of life to the actual humans who live here. They should absolutely be included in the pest management programme.	Include feral cats in the Plan.	Feral Cats	Note	Although the submitter's support for the Plan is acknowledged, it is noted that feral cats are only included in the Dunedin site-led programmes. Region-wide rules are not proposed.
P183.4	Routeburn Dart Wildlife Trust	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P185.3	Nicola Richards	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P185.8	Nicola Richards	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P188.1	Susan Margaret McKellar	In section 6.5 of the proposed Otago Regional Pest Management plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of humane and socially accepted solution in the form of TNR (Trap, Neuter and Release). I suggest that charties such as Cat Rescue Dunedin are contacted and funded to carry out this work as they are currently already working to do their best with limited resources and volunteers, to lower the feral cat population in the Dunedin area. I would like to point out that the feral cat problem is one that has been caused by irresponsible humans dumping their unwanted and un neutered pets to forage for themselves or by missing pets who have accidentally become strays and this is where the problem should be addressed - with severe penalties for those who carry out this inhumane behaviour. I would also like to see increased education regarding neutering pets as well as regulations imposing their spay and neuter, much as is done with dogs. I would also like to see regulations imposed on the compulsory microchipping of cats and future cat owners required to have a licence to own cats. Eventually all cat owners would need to be licenced when they obtain a new cat. I do not believe there are other sustainable methods which would not also target pets. TNR has been proven to be a successful tool in reducing numbers of feral cats as has been shown by a number of studies.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part	See response to submission P026.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P189.2	Diana Stiven	I do not support the inclusion of feral cats for site-led control.,	Remove feral cats from site-led control programmes.	Feral Cats	Reject	See response to submission P011.1.
P190.1	Anya Graeff	The proposed regional pest management plan should not be widened as to include 'feral cats' within its provisions. I strongly oppose this provision as it poses as a threat to cats within Dunedin's communities. The term 'feral cat' is ambiguous and therefore imparts discretion on pest control to define what is encompassed under this term. Thus to include 'feral cats' as a pest under the provision, this creates the chance for neighbourhood cats or unmicrochipped domestic cats to be treated as pests. This is a step too far and carries with it the risk of domestic cats being killed. To conclude, myself and many others strongly oppose this provision, it would be of great harm to families in the community to lose much loved pets because of this.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P191.1	Christine Hoffman	I feel feral cats need to be treated as pests and that pet cats should be registered and micro chipped using a bi-law so that after an adjustment period trapping of cats can be taken with pets returning to owners and strays being humanly euthanised therefore reducing the population of stay cats without affecting good pet owners. As it stands there is no telling the difference between a stray and pet cat.	Support inclusion of feral cats in the Plan. Pet cats should be registered and microchipped.	Feral Cats	Reject in part.	See response to submission P026.1.
P192.1	Jacqui A Law	I oppose listing feral cats as a pest, as this can and I believe will lead to domestic cats being killed. We have already had issues with traps being set at the end of our drive at a height that could easily trap our cat, for it to only be moved to the next door neighbours driveway. There is nothing that you could say or do that would protect domestic cats, as there are people out there as soon as they hear that it is okay to kill cats they will, not caring if they are a beloved member of someones family.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P194.1	Amanda Jane Hayward	In section 6.5 of the proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of a humane and socially accepted solution which is TNR (Trap, Neuter, Release). For this I suggest contacting and funding charities such as Cat Rescue Dunedin who with limited funding and volunteers, already do their best in lowering the feral cat population in the wider Dunedin area. I do not believe there are other sustainable methods which would not also target peoples pets. Trap, neuter and return programs work by trapping the cats and, instead of euthanizing them, releasing the fixed cats back into the area they were found. The new colonies will hold their territory and prevent other cats from moving into the area. That last part is crucial to controlling the feral cat population. TNR has shown that it can be successfully used.... To put this type of strategy in place in order to control cats and their impact on the environment and wildlife is pure evil. It also reeks of stupidity as cats are notorious at keeping our rodent population (their number one prey) down and rodents are a greater threat to our native birds as they devour their eggs. To place cats in the same category as pests such as stoats, ferrets and rats smacks of idiocy. I do believe all cat owners do have a responsibility to ensure that their cats are desexed and feral cats who have been dumped and left to fend for themselves by irresponsible humans are not at fault here. Perhaps harsher penalties for people abandoning and neglecting their animals and more education, as well as measures that only allow cats to be sold by licenced pet shops and must be desexed, would ensure that cats are only available to responsible pet owners. These measures would see the same outcomes for our wildlife without the cruel heartless and inhumane actions that are currently being proposed.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part.	See response to submission P026.1.
P195.1	Tracey Lee England	In section 6.5 of the proposed Otago Regional Pest Management Plan you suggest the site-led management of the Otago feral cat population. I only support this in that I would like to see further support of a humane and socially accepted solution which is TNR (Trap, Neuter, Release). For this I suggest contacting and funding charities such as Cat Rescue Dunedin who with limited funding and volunteers, already do their best in lowering the feral cat population in the wider Dunedin area. I do not believe there are other sustainable methods which would not also target peoples pets. Trap, neuter and return programs work by trapping the cats and, instead of euthanizing them, releasing the fixed cats back into the area they were found. The new colonies will hold their territory and prevent other cats from moving into the area. That last part is crucial to controlling the feral cat population. TNR has shown that it can be successfully used.... To put this type of strategy in place in order to control cats and their impact on the environment and wildlife is pure evil. It also reeks of stupidity as cats are notorious at keeping our rodent population (their number one prey) down and rodents are a greater threat to our native birds as they devour their eggs. To place cats in the same category as pests such as stoats, ferrets and rats smacks of idiocy. I do believe all cat owners do have a responsibility to ensure that their cats are desexed and feral cats who have been dumped and left to fend for themselves by irresponsible humans are not at fault here. Perhaps harsher penalties for people abandoning and neglecting their animals and more education, as well as measures that only allow cats to be sold by licenced pet shops and must be desexed, would ensure that cats are only available to responsible pet owners. These measures would see the same outcomes for our wildlife without the cruel heartless and inhumane actions that are currently being proposed.	Support the inclusion of feral cats in the plan subject to funding charities, education, and a trap, neuter and release programme.	Feral Cats	Reject in part.	See response to submission P026.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P199.3	Kim Clifton	4. Magpies are the main problem followed by Opossums - not CATS 5. What guarantees are there that you will not harm innocent animals/birds/humans. 6, What proof of competency of planning - proven skills - do you have of the people who will be carrying this out? 7. What facts or information/statistics do we have to guarantee we are not given a fanciful improvement graph at the end of the proposed pest management scheme? 8. What are the costs? 9. What guarantees do I have that you will not kill my pets? I am sure none of the orc would like their pets hunted down and tortured to death? I am sure their children would find that as distressing as mine would?	Cats are not a problem in the Mt Cargill area.	Feral Cats	Reject	See response to submission P013.1.
P200.1	Jocelyn Elta Wilson	Cats are on the whole loved and cared for by responsible people and to kill someone's much loved cat is deplorable. In the case of feral cats trapping and desexing them is a much kinder option, killing for the sake of killing is not a humane option we should be supporting. Please do not do this. I live in an area where uncontrolled dogs cause much more of a problem than cats but we don't seem to class dogs as pests, why? This relates to the regional pest management plan.	Remove cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P201.6	Dunedin City Council	The DCC supports the inclusion of feral cat (Felis catus) on the list of pest animal species in Table 2 (at 4.1, page 21). In July 2017, the DCC proposed a remit calling for Local Government New Zealand (LGNZ) to lobby the Government to implement the final version of the National Cat Management Strategy, which recognises the importance of both companion cats and indigenous wildlife to many New Zealanders. LGNZ voted in favour of the remit. The DCC is supportive of greater local government regulatory powers to address cat management, including cat microchipping, cat de-sexing and responsible cat ownership.	Support the inclusion of feral cats as a pest in the Plan.	Feral Cats	Accept	Support for the inclusion of feral cats in the Plan is accepted. The Panel notes that ORC staff will work cooperatively with DCC on feral cat management in the Dunedin site-led areas.
P203.1	Emma Guglietta	6.5.3 Description and adverse effects of pests to be managed under site-led programmes. I oppose stray cats/feral cats being listed as pests, these can often be lost pets or abandoned by humans and it is impossible to tell the difference. I support the trap, neuter and release to reduce the population over time or rehoming with financial support for institutions like Cat Rescue Dunedin. I fear that stray/feral cats being listed at pests will allow those who do not like cats to have an excuse to harm or kill cats by saying they are strays or feral as we have already seen so may pet cats shot at around the country. I cannot imagine a life without pet cats and my 2 came from Cat rescue as strays, one likely from an elderly owner who passed away. I would support some owner responsibility similar to dogs ie registration and mandatory microchipping, neutering to make owners more responsible and cat ownership to be taken more seriously rather than a temporary thing. The 2 cats I have are very loving and I hurts me to think that if I did not adopt them they would be considered pets and poisoned or shot. I have seen dogs do more harm on the peninsula to penguins and wildlife yet they are not mentioned.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P013.1.
P204.1	Olwyn Grey	I Say No to ORC categorizing Cat's as Pests.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P011.1.
P205 .1	Nicola Levens	I oppose the inclusion of ferral cats in the pest management plan.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P011.1.
P207.1	Karla Butler	I oppose that you have included cats. They are not pests but peoples beloved pets.	Remove feral cats from the Plan.	Feral Cats	Reject	See response to submission P011.1.
P208.1	Nicolene	I oppose your plan of wanting to kill our cats and feral cats they are not pests and have never been classed as pests around the world, due to them we dont have rats and all the deceases that go with rats ; for 7 years I have been feeding a colony of feral cats , TNR and re homed allot of the ones that I tamed,, when they finish eating then the birds come and eat and at night the hedgehogs come and eat, We love our cats , fur baby's, nature takes car of itself and has for 1000 of years, why is man trying to play God, you want to put down poison for cats be careful that the birds dont eat it seeing its all about the birds. FEEBLE excuse , you poisoning the water and the soil as well, Getting people to kill them, what are you creating MONSTERS, so YES I appose this plan of wanting to call cats pests.	Remove feral cats from the Plan.	Feral Cats	Reject	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. See responses to submissions P013.1 and P011.1.
P211.6	John Parker	There is a problem with identifying feral cats, and the solution is microchipping. This is a mechanism that should be considered by ORC.	Support microchipping for cats.	Feral Cats	Reject	See response to submission P026.1.
P211.7	John Parker	Rule 6.5.4.1 I support this rule and wish to see feral cats added to the list, to be consistent with the Objective 6.5.4.a.	Include feral cats in the list of pest animals at Rule 6.5.4.1 (Site-led programmes for the Otago Peninsula).	Feral Cats	Accept	Rule 6.5.4.1 restricts the keeping, holding, enclosing or otherwise harbouring listed animal pests in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas. This submission is recommended to be accepted. The reason for this rule is to help achieve the exclusion, eradication or control of animal pests in the site-led areas. Amending the rule to include feral cats is recommended and will mean feral cats cannot be held or harboured, without an exemption in place. The Panel is satisfied that as this places no additional burden on land occupiers (other than advising ORC if they suspect there may be feral cats on their property and allowing ORC access if necessary), no further cost benefit analysis is required as part of this plan review process.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P213.4	Diana Noonan	Lastly, I would like the Management Plan to address the issue of feral and domestic cats as predators of native species. Native flora and fauna are directly impacted by predator cats. I believe cats, like dogs, must be kept under control at all times – and must be licensed. In areas on the fringes of reserves such as at the Catlins Forest Park, I do not believe cats should be a permitted domestic animal under any circumstances.	Address the issue of cat predation on native species, through further controls on cats.	Feral Cats	Reject	See response to submission P026.1.
P214.1	Catherine Brigham	To kill, trap, shoot or poison Cats. I oppose any cats being killed or poisoned unless injured/sick. Instead I propose a \$20 Spey program like they have in Manawatu, Porirua, Palmerston North.	Manage feral cats through speying only.	Feral Cats	Reject	See response to submission P026.1.
P215.1	Alana Carroll	Cats should be limited to 1 per house hold.	Limit cats to one per household.	Feral Cats	Reject	See response to submission P026.1.
P216.1	Wendy Ann Merritt	Cats.....proposed regional pest management plan, Dec 2018 I wish to strongly disagree with cats being included on the regional pest list. I have a beautiful large cleaver male 8 year old cat. He catches many many mice and young rats and only one or two birds a year. He always brings his catch home for me. He does not eat them. I do know what he catches. The large number of rats and mice he catches must save hundreds of birds, even wild cats will catch rats and mice. I ask ....Why pick on cats they first became domesticated to control vermin, is that an inconvenient truth? My cat often heads off to our local bush to hunt. Change the status and you put my beautiful helpful friend at risk. Please do not make any cats a pest. Wendy Merritt	Remove cats from the Plan.	Feral Cats	Reject	See response to submission P011.1.
P217.11	Predator Free NZ Trust	Plan Rule 6.5.5.1 We support Plan Rule 6.5.5.1 which states: No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present at West Harbour – Mt. Cargill (identified on Map 3 in Appendix 3) any a) Bennett’s wallaby; b) feral deer; c) feral goat; d) feral pig; e) mustelid; f) hedgehog; or g) possum. A breach of this rule creates an offence under section 154N(19) of the Act. There is no mention of releasing or abandoning cats feral or otherwise into this environment. It would be prudent to include pest cats in this Rule. Council should include this Rule in the plan. But council should also consider including cats in the list of animal pests listed in Plan Rule 6.5.5.1.	Add cats to the pest animals listed in Plan Rule 6.5.5.1	Feral Cats	Accept in part	See response to submission P128.3 regarding the release or abandoning of cats. Rules 6.5.5.1 and 6.5.4.1 restrict the keeping, holding, enclosing or otherwise harbouring listed animal pests in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas. The reason for these rules is to help achieve the exclusion, eradication or control of animal pests in the site-led areas. The Panel recommends amendments to the rules to include feral cats and this will mean feral cats cannot be held or harboured, without an exemption in place. The Panel is satisfied that the recommended amendments place no additional burden on land occupiers (other than advising ORC if they suspect there may be feral cats on their property and allowing ORC access if necessary) and so consider that no further cost benefit analysis was needed as part of this plan review process.
P217.15	Jessie Morgan	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 we think this is an important inclusion in the plan. For example in GWRC proposed RPMP that has a 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.” We suggest ORC also includes a similar provision in their RPMP. Feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P217.2	Predator Free NZ Trust	Our main suggestion is around clarifying the definition of feral cats. Feral cats are highly skilled hunters and have been branded as ‘the ultimate predators’ in New Zealand. New Zealand’s unique native wildlife is particularly vulnerable to predation by cats. Cats are also the major vector for the spread of toxoplasmosis which causes abortions in sheep and illness in humans. The current plan includes feral cats but in our opinion a clearer definition of a feral cat is needed so cat control can happen at locations near populated areas e.g near settlements on the Otago peninsula. We recommend that feral cats are renamed “pest cats” to include all unowned cats (both Auckland Council and Greater Wellington city council have done this in their proposed RPMPs). We also recommend that “pest cats” are defined as a cat without a microchip. Microchipping is inline with recommendations from NZ Vets Association and SPCA in terms of best practice responsible cat ownership.	Definition of 'feral cats' is replaced with a definition of 'pest cats' throughout the Plan. Definition of 'pest cat' is 'a cat without a microchip'.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P217.5	Predator Free NZ Trust	We support the inclusion of feral cats for site-led control. Cats 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 we don't control them then nothing else will. They are found from sea level to the alpine zone and kill regardless of hunger. 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. The National Cat Management Strategy also recommends microchipping as the easiest way to identify an owned cat. Controlling cats in near populated areas, such as the 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, at specific sites, to be microchipped protects owned cats from being incorrectly identified as unowned cats. We suggest that the name "feral cat" is changed to "pest cat" to ensure all cats are clearly defined in the plan and that unowned stray cats can also be controlled. And "pest cats" are defined as cats without a registered microchip. Both GWRC and Auckland Council have included definitions of "pest cats" within their proposed RPMP to enable control of unowned cats at specific sites. In the current definition of feral cats there is no mention of Toxoplasmosis, a disease carried by cats and spread to sheep. It causes ewes to abort their foetuses and can be very damaging to a farms productivity. Many farmers immunise their sheep against toxoplasmosis (a costly exercise) but the immunisation is not 100% effective and toxoplasmosis "storms" can still affect an immunised farm.	Rename "feral cats" to "pest cats" and change the definition of a pest cat to "a cat without a registered microchip". The role cats play in the spread of toxoplasmosis to be mentioned in the definition of a cat.	Feral Cats	Reject	See response to submission P128.3.
P217.9	Predator Free NZ Trust	Plan Rule 6.5.4.1 We support Plan Rule 6.5.4.1 which states: No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Otago Peninsula (identified on Map 3 in Appendix 3) any: a) Bennett's wallaby; b) feral deer; c) feral goat; d) feral pig; e) mustelid; f) hedgehog; or g) possum. A breach of this rule creates an offence under section 154N(19) of the Act. For the purpose of this rule place includes any building, conveyance, craft, land, or structure. There is no mention of releasing or abandoning cats feral or otherwise into this environment. It would be prudent to include pest cats in this Rule. Council should include this Rule in the plan. But council should also consider including cats in the list of animal pests listed in Plan Rule 6.5.4.1.	Amend Rule 6.5.4.1 to include cats. Otherwise adopt the rule as proposed.	Feral cats	Accept in part	See response to submission P128.3 regarding the release or abandoning of cats. Rules 6.5.5.1 and 6.5.4.1 restrict the keeping, holding, enclosing or otherwise harbouring listed animal pests in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas. The reason for these rules is to help achieve the exclusion, eradication or control of animal pests in the site-led areas. The Panel recommends amendments to the rules to include feral cats and this will mean feral cats cannot be held or harboured, without an exemption in place. The Panel is satisfied that the recommended amendments place no additional burden on land occupiers (other than advising ORC if they suspect there may be feral cats on their property and allowing ORC access if necessary) and so consider that no further cost benefit analysis was needed as part of this plan review process.
P223.3	Grant Lester	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip" and require owned cats to be microchipped.	Feral Cats	Reject	See response to submission P128.3.
P223.8	Grant Lester	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P224.3	Alan Roberts	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip" and require owned cats to be microchipped.	Feral Cats	Reject	See response to submission P128.3.
P224.8	Alan Roberts	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P225.3	Grant Crawford	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip" and require owned cats to be microchipped.	Feral Cats	Reject	See response to submission P128.3.
P225.8	Grant Crawford	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P226.1	Heather Wilson	I think the ORC should not classify feral cats as pests. Feral cats should be controlled but not at the risk of non-feral cats who frequent the same areas, are lost or temporarily strays. I support microchipping.	Remove cats from the Plan control feral cats and support microchipping.	Feral Cats	Reject	See response to submission P019.1.
P231.3	Keith Marshall	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip" and require owned cats to be microchipped.	Feral Cats	Reject in part	Support for the inclusion of feral cats in the Dunedin site-led programmes is acknowledged. See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P231.8	Keith Marshall	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P233.1	Elizabeth Guthrie Higbee	I don't want cats to be included in the pest management strategy. It is too difficult to distinguish feral cats from domestic companion animals and many people love cats. I prefer to support Trap Neuter and Release strategies.	Remove cats from the plan and encourage Trap, Neuter and Release strategies	Feral Cats	Reject	See response to submission P019.1.
P234.1	Alyson Scott	I am writing to you today to express my concern about the proposed Otago Regional Pest Management Plan. I vehemently believe that cats, feral or otherwise, should not be regarded as pests. I believe in animal rights. I do not believe we have the right to assign any other species as pests. If there is a pest here that needs to be culled it is us. We are the ones who have produced global warming, nuclear waste, and pollution in general. We are stuffing up the planet. I consider that cats should be helped. I don't even agree with de-sexing but because of the way we run the world this is an option - trap, desex, treat, try to rehome or release. Cats should not be regarded as pests.	Remove cats from the plan and encourage Trap, Neuter and Release strategies	Feral Cats	Reject	See response to submission P019.1.
P236.1	Julia Gay Anson	I wish to strongly oppose the inclusion of household cats as a "pest" with regard to the pest management plan and totally reject any bid to limit the freedoms of household cats to access to the outdoors.	Opposes including household cats as pests and limiting their access to the outdoors	Feral Cats	Reject	Household cats are not classified as pests in the Plan.
P237.3	Mary Pearson	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip" and require owned cats to be microchipped.	Feral Cats	Reject in part	See response to submission P128.3.
P237.8	Mary Pearson	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P238.1	Gillian Duguid	I strongly oppose the inclusion of cats, feral or otherwise, being included in the Pest Management Plan.	Remove cats from the plan.	Feral cats	Reject	See response to submission P011.1.
P241.1	Kara Flanagan	I do not support the proposed classing of cats as pests or killing them under the regional pest management plan. It's too great a risk to people's beloved pets being killed and that isn't fair	Remove cats from the plan.	Feral cats	Reject	See response to submission P011.1.
P245.1	Colin Sanders	I would to submit that feral cats are not included in the regional pest management plan	Remove feral cats from the plan.	Feral cats	Reject	See response to submission P011.1.
P246.1	Christie Williams	Including feral cats is insane how do you tell a feral cat from a house cat?! Cats live everywhere some are friendly and some aren't so how do you propose you can tell them apart? Or will you just kill peoples pets too? And if so can you be held accountable for doing so?	Remove cats from the plan.	Feral cats	Reject	See response to submission P013.1.
P247.1	Nick Rowcroft	I am voting against feral cats or cats of any category being categorised as 'pests' in the new plan. Stop being influenced by people such as Gareth Morgan who uses his money and influence to deliver bias and un objective views on the effect cats have on the environment. ORC show some leadership and listen to your citizens. Stop the killing and help fund the many hard working volunteer organisations that run successful TNR ( Trap Neuter Return) programmes that have proven to be successful . I am against cats being classified as pests.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral cats	Reject	See response to submission P019.1.
P248.1	Mayumi Rowcroft	I'm against any cats being reclassified as pests. Money should be injected into trap neuter return programs that are humane, none lethal and proven to be successful in reducing stray cat numbers without killing.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral cats	Reject	See response to submission P019.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P251.1	Linda Mulholland	My submission is with respect to cat management and comes from my time working within cat rescue from 2015 to 2017 and observations of the situations that animal welfare group find themselves up against. During that time I developed the view that to manage the cat population, the best way to do that would be : - A dedicated fund for desexing cats (at least female cats). It is a persons choice to obtain a cat but people for various reasons do not get around to doing it. One cat spay costs approximately \$100 to \$200 but if that cat is not spayed and her offspring breed exponentially then the cost skyrockets to say \$60 per euthanasia. I realise there are more cost effective methods for euthanasia but my point is that the cost would be offset at the very beginning through desexing. Saying it is the owners responsibility is true but the cat doesn't ask to be in the situation. Early stage desexing deals to the issue and lessens the number of cats. My second view point is that cat welfare groups should be funded to assist them to manage cat populations. There are people who will automatically seek pest control but for members of the public who see a colony of cats and find the idea of culling unpalatable then they will chose not to report cats for fear of them being killed. A soft option of funding cat welfare groups mean that they will operate a rescue, rehabilitate and rehome system for cats or a TNR system and maintenance within colonies. Colonies tend to act as a satellite especially around say the university for abandoned cats and by migrating to a colony they are detected early and desexed, homed if possible, so that they cease to add to the cat population. I understand that culling of feral cats must happen to protect vulnerable native species populations but I would advocate for a symbiotic approach that prevents cats becoming feral in the first place through desexing, management, microchipping and perhaps even penalising and fining irresponsible owners who let their cats breed out of control. I know there are many many people through out Dunedin who work extremely hard to limit cat populations but they could have so much more potential through proper funding and resources. Thank you	Fund trap, neuter and release programmes and cat welfare groups.	Feral cats	Reject	See response to submission P026.1.
P253.3	SPCA	Considerations for feral cats (distinguish between stray and feral): SPCA encourages the Otago Regional Council to be clear whether the Proposed Plan is targeting only feral cats or if stray cats are also targeted. Currently, in the Proposed Plan, the description for “feral cat” (Otago Regional Council, 2018, p. 68) includes language that also describes stray cats, and it is unclear whether stray cats will be targeted. The difference between this designation has management implications that impact the welfare for these two types of cats. Both feral and stray cats are the same species of animal, however, their behaviour and needs are distinct, which impacts their welfare when controlling populations. Feral cats have no contact with humans and are generally located in areas of bush. None of their needs are provided by humans and their population is self-sustaining. Feral cats have a wild temperament and are not suitable as companion animals. SPCA acknowledges that feral cats are considered a ‘pest’ species under New Zealand law and recognises the need to act on ecological and conservation concerns where predation is a serious problem. However, our organisation is strongly opposed to inhumane methods of killing feral cats which do not bring about a quick and pain-free death. Stray cats are unowned cats, sometimes known as community cats. They live in urban areas and have many of their needs directly or indirectly met by humans. Some stray cats are not socialised with humans, behave in a wild manner, and cannot be handled. Others may have been lost or abandoned by humans; these stray cats are socialised, and could be rehomed in certain circumstances.	A clear distinction is made between 'feral cats' and 'stray cats' in the Plan, and non-lethal cat control programmes such as rehoming and trap, neuter and release should be considered.	Feral Cats	Accept	A definition of 'feral cat' is recommended to clarify that the Plan does not apply to pet or stray cats. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this (such as trap, neuter release, microchipping, free or subsidised desexing etc). ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the humane management of feral cats. This will be developed within the next 12 months in accordance with the Strategy. ORC follows animal welfare guidelines with all animal control programmes. This means using efficient and humane best-practice techniques and adhering to the Animal Welfare Act 1999 at all times.
P253.4	SPCA	SPCA would like to see the number of stray cats decrease across the country and eventually, ideally, for there to be no stray cats in New Zealand. The Society believes that the only humane and sustainable way to achieve this is through the implementation of a combination of management strategies, including effective non-lethal cat control programmes such as managed targeted trap-neuter-return programmes. However, these must be carried out responsibly and may not be possible in ecologically sensitive areas where cats pose a significant risk to native wildlife. Rehoming stray cats that are suitable for human companionship and trap-neuter-return programmes to control populations should also be considered for achieving the goals of the Proposed Plan.	Where possible, stray cats should be subject to trap-neuter and return programmes rather than culling.	Feral Cats	Reject	See response to submission P026.1. The Panel agrees that a combination of different management strategies are needed.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P256.1	Ali Elder	I am writing in regards to the proposal of including Feral Cats, in the new Otago Regional Pest Management Plan. I am highly against this proposal as I believe that it may well lead to domestic cats being slain through, either mistaken identity or by people who just do not like cats and can use the management plan as an argument for having killed a cat/cats. Yes these people are in our community and would not hesitate to take advantage of an opportunity. I also believe that there is documented evidence showing that other communities who have implemented these types of plans have failed in their endeavours to achieve their objective. I believe that we should be looking at other options for reducing the amount of wild cats that are in the community. (1) Support organisations such as Cat Rescue to continue their hard work in trapping, neutering and either rehoming or returning programmes.(2) Implement the process of all cats being registered and the ban of live animal sales on the internet and in pet shops as this promotes impulse buying which often leads to animals (especially cats) being abandoned once the novelty wears off or reality hits. (3) Only approved cat breeders should be allowed to breed cats with a legal requirement to follow up with buyers to ensure that their cats have been de-sexed or a stipulation that cats are de-sexed prior to sale. DO NOT give licence to just anyone to target and kill cats that they may perceive are feral. DO NOT rely on microchips as I had two cats who were microchipped but it transpired that they were faulty and could not be read.	Remove cats from the plan and support groups to trap, neuter and release, introduce the registration of cats, ban internet sale of animals, only allow approved cat breeders to breed cats and do not rely solely on registered microchips.	Feral cats	Reject	See response to submission P019.1.
P258.19	Forest and Bird	Forest and Bird considers the ORC in collaboration with the DCC and other territorial authorities need to seek greater regulatory powers to address cat management including microchipping and de sexing. This would help protect cherished domestic cats.	ORC should seek greater powers for cat management.	Feral cats	Accept in part	The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations such as DCC and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. ORC has not carried out or been involved in the control of feral cats to date and the Panel considers a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in these areas. As this is the very early stages of ORC being involved, the Panel is satisfied that working alongside the community will achieve the desired outcomes. This is especially important where there are so many community members who are concerned about animal welfare and unintended consequences for their pet cats. As the focus of the site-led programmes are to support in the management of feral cats, and not domestic or stray cats, rules requiring microchipping and desexing are not recommended at this time.
P265.1	J Simons	PLEASE DO NOT INCLUDE CATS AS PESTS. RATHER HELP CAT RESCUES WITH FUNDING. SUPPORT TNR AS A STRATEGIC RESPONSE.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral cats	Reject	See response to submission P019.1.
P266.13	Lindis Pass Conservation Group Inc	6.5.2. site-led programmes; Feral cat, Felis catus. Councils have to find a creative way to control and reducing cat numbers. While the Plan has a "site-led" Primary Programme for cats, this should, rather, be Eradication. Containment is not an option for this clever predator. If the problem of feral cats isn't taken seriously, no progress at all will be made. We submit that feral cats are a scourge in the high country, being present in substantial numbers, and bringing about more destruction of native animals than any other agent. Lindis Pass has its share of creatures such as rare lizards and wetas, but cat scat is now found everywhere. That scat contains lizard scales, pieces of insect, and the feathers and bones of ground-nesting birds. Populations of Grand and Otago Skinks (and other reptiles) in the uplands of the Lindis catchment have been steadily diminished by cats and mustelids, to the extent that they are now in rapid decline as Endangered Species, requiring special very expensive means to save them. Leaving them in the landscape to survive by themselves is no longer an option, the predation rate is so high.	1. ORC to target feral cats for eradication. 2. ORC to include Felis catus in a "Site-Led Pest Programme" in the Lindis catchment, targeting this pest in a long-term and consistent manner. 3. ORC to work with ECAN to eliminate feral cats from both sides of the mountains that run from Omarama and the Ahuriri towards Tarras.	Feral cats	Reject	ORC has not carried out or been involved in the control of feral cats to date and the Panel considers a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in the Dunedin site-led areas. As this is the very early stages of ORC being involved, the Panel is satisfied that working alongside the community will achieve the desired outcomes. This is especially important where there are so many community members concerned about animal welfare and unintended consequences for their pet cats. See submission P201.8 regarding the establishment of new site-led programmes in the Plan.
P267.10	Arrowtown Village Association	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. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P268.11	Fiona Rowley	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.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P268.7	Fiona Rowley	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P269.1	Kylie Weastell	I am writing to you to express that I am opposed to the proposal of including Feral Cats, in the new Otago Regional Pest Management Plan. I am concerned that including 'Feral Cats' will inevitably lead to people's beloved pets being caught in the wrong place at the wrong time and killed. I am also concerned that we will put all these resources into trapping and killing these cats, however it won't achieve what you are wanting to achieve. Many other communities have tried this approach and have failed .. there is substantial evidence that indicates removing feral cat populations only opens up the habitat to an influx of new cats, either from neighbouring territories or born from survivors. Each time these cats are removed, the population rebounds - this is known as the 'vacuum effect'. This vacuum effect has been well-documented among biologists. The newly empty habitat attracts other members of the species, who arrive to take advantage of the same resources that attracted the first lot. Basically, no matter how many cats are removed, if the resources remain, the population will always recover. Any cats remaining after a catch and kill effort will produce more kittens and at a higher survival rate, filling the habitat to capacity. The only humane and progressive way forward on this issue is to support the likes of Cat Rescue Dunedin, so they can continue their TNR (trap-neuter-return) programs. We should be putting our resources into organisations like this - helping subsidise desexing for cats etc. This TNR method not only is the only humane option for feral cats, it also improves their lives by relieving them of the stresses of mating and pregnancy. It has also been proved to work, unlike the trap and kill method.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral Cats	Reject	See response to submission P019.1.
P272.1	Wendy Hodgson	I decidedly oppose the inclusion of 'feral cats' into the 'pest' category in the ORC Pest Management Plan. 1. I believe this decision is inherently wrong with so much in papers plus lost and found sites of cruelty to cats by shooting and stomping on them etc etc of late which I feel has a lot to do with the Predator Free 2050 initiation by DOC and Gareth Morgan Trust that led to witch-hunts across NZ by individuals who've taken it seriously with a genuine dislike for cats be they neighbours, a missing cat strayed or cats just left to themselves.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral cats	Reject	See response to submission P019.1.
P282.10	Duncan Keenan	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. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P282.8	Duncan Keenan	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P283.10	Wakatipu Reforestation Trust	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 we think this is an important inclusion in the plan. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P283.8	Wakatipu Reforestation Trust	We 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. We 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. We 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P284.3	Peter Ripley	Let us all drop the pretense and agree domestic cats are a POTENTIAL risk to be managed, but in a different way to the management of feral cats which pose a CURRENT risk. Domestic cats do feed into the feral cat population and can thus be agreed to be "potential pests". Management of domestic cats should not, indeed cannot, be done by some draconian programme... but it can be done by the Otago Regional Council funding voluntary domestic cat desexing and microchipping programmes. Desexing has known and obvious benefits. Microchipping may improve our knowledge of feral/stray cats and of the activities of domestic cats. Summary: I would like the ORC to name domestic cats as a "potential pest" to be managed by the funding of voluntary cat desexing and microchipping programmes.	Declare domestic cats as "Potential Pests" to be managed by the funding of desexing and microchipping programmes.	Feral Cats	Reject	Domestic cats are not classified as pests in the Plan.
P289.6	Director General of Conservation	I support the inclusion of feral cats on the list of pest animal species. Feral cats can be classified as pests under the Biosecurity Act 1993 and subject to control under a pest management strategy. I submit that the ORC work with territorial government agencies to manage feral cats as pests. De-sexing, vaccination and microchipping of companion cats may promote responsible cat ownership enabling control of feral cats and an overall reduction of impacts on indigenous wildlife. I recommend an amendment to the RPMP for the progressive containment of feral cats within the areas covered by the Predator Free Dunedin (PFD) programme, and other predator free programmes which may arise over the life of the Plan.	Progressive containment of feral cats within the areas covered by predator free programmes.	Feral cats	Reject	ORC has not carried out or been involved in the control of feral cats to date and the Panel considers a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in the Dunedin site-led areas. As this is the very early stages of ORC being involved, the Panel is satisfied that a sustained control programme is appropriate.
P293.6	Otago Peninsula Biodiversity Group	Table 25 (page 74): "Characteristics and threats of pests in site-led programmes" requires a clearer description of what identifies feral cats.	Clarify the definition of feral cat	Feral Cats	Accept	A definition of 'feral cat' and amendments to Table 25 to clarify that the Plan applies to feral cats only, and not pet or stray cats, is recommended.
P295.15	Landscape Connections Trust Halo Project	Rule 6.5.5.1: Feral cats need to be added to this list. It is odd that they would be in the Objective but not in the rule.	Feral cats are added to Plan Rule 6.5.5.1	Feral cats	Accept	Rules 6.5.5.1 and 6.5.4.1 restrict the keeping, holding, enclosing or otherwise harbouring listed animal pests in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas. The reason for these rules is to help achieve the exclusion, eradication or control of animal pests in the site-led areas. The Panel recommends amendments to the rules to include feral cats and this will mean feral cats cannot be held or harboured, without an exemption in place. The Panel is satisfied that the recommended amendments place no additional burden on land occupiers (other than advising ORC if they suspect there may be feral cats on their property and allowing ORC access if necessary) and so consider that no further cost benefit analysis was needed as part of this plan review process.
P295.6	Landscape Connections Trust Halo Project	LCT believes we should be aiming for progressive containment of feral cats across the region. Microchipping companion cats is just one of the management tools that ORC may consider for controlling feral cats, ensuring resident's companion cats are safe from any targeted operations. Early in 2019 LCT is trialling a voluntary microchipping scheme with communities in Port Chalmers, Sawyers Bay and surrounding settlements. We would appreciate the opportunity to share our progress with the ORC, and to discuss how this pilot project may be scaled up.	Council work with LCT to establish the feasibility of the LCT trial voluntary microchipping programme underway, for roll out regionally.	Feral cats	Reject	This is an implementation matter and is therefore outside the scope of the Plan. The Panel notes that ORC Staff will liaise with LTC outside the formal process.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P296.2	Morgan Foundation	We 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. We suggest that the name "feral cat" is changed to "pest cat" 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P296.3	Morgan Foundation	In the current definition of feral cats there is no mention of Toxoplasmosis, a disease carried by cats and spread to sheep. It causes ewes to abort their foetuses and can be very damaging to a farms productivity. Many farmers immunise their sheep against toxoplasmosis (a costly exercise) but the immunisation is not 100% effective and toxoplasmosis "storms" can still affect an immunised farm.	We would like the role cats play in the spread of toxoplasmosis to be mentioned in the definition of a cat. Recognising that cats impact both biodiversity and primary production.	Feral cats	Note	The submitter has not provided information about what amendment is specifically requested, and where this should sit in the Plan however it is noted that the role cats play in the spread of toxoplasmosis is already set out in Table 25 of the Plan.
P296.8	Morgan Foundation	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.	Feral Cats	Reject	See response to submission P128.3.
P297.3	Forest & Bird - Tautuku Restoration Project	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 Papatowai, which borders a large area of native lowland coastal forest, 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P298.13	Predator Free Dunedin	PFD believe we should be aiming for progressive containment of feral cats across the region. Feral cats are highly skilled hunters and New Zealand's unique native wildlife is particularly vulnerable to predation by cats. ORC might look to Auckland and Greater Wellington for suggestions on how to identify and manage feral cats.	Feral cats included as pest animals for 'progressive containment'.	Feral cats	Reject	ORC has not carried out or been involved in the control of feral cats to date and the Panel considers a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in the Dunedin site-led areas. As this is the very early stages of ORC being involved, the Panel is satisfied a sustained control programme is appropriate.
P298.20	Predator Free Dunedin	Plan Rule 6.5.4.1: Feral cats need to be added to this list. It is at odds for them to be in the Objective but not in the rule.	Feral Cats are added to Plan Rule 6.5.5.1.	Feral cats	Accept	Rule 6.5.4.1 restricts the keeping, holding, enclosing or otherwise harbouring listed animal pests in the Otago Peninsula and West Harbour – Mt. Cargill site-led areas. The reason for this rule is to help achieve the exclusion, eradication or control of animal pests in the site-led areas. The Panel recommends amendments to the rules to include feral cats and this will mean feral cats cannot be held or harboured, without an exemption in place. The Panel is satisfied that the recommended amendments place no additional burden on land occupiers (other than advising ORC if they suspect there may be feral cats on their property and allowing ORC access if necessary) and so consider that no further cost benefit analysis was needed as part of this plan review process.
P298.23	Predator Free Dunedin	Plan Rule 6.5.5.1: Feral cats need to be added to this list. It is at odds for them to be in the Objective but not in the rule.	Feral Cats are added to Plan Rule 6.5.5.1.	Feral cats	Accept	See response to submission P298.20.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.6	Predator Free Dunedin	Microchipping companion cats is just one of the management tools that ORC may consider for controlling feral cats, ensuring resident's companion cats are safe from any targeted operations.	Council consider microchipping of cats.	Feral cats	Note	See response to submission P026.1.
P301.1	Fionna McCormich	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. 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.	Remove feral cats from the plan and suggest the registration and desexing of cats with subsidies.	Feral cats	Reject	See response to submission P019.1.
P302.1	Feline Rights New Zealand	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.	The definition of feral cats is retained, and no reference is made to 'pest cats'.	Feral cats	Accept	The Plan applies to feral cats, and there are no rules regarding 'pest cats' in the Plan.
P302.2	Feline Rights New Zealand	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". 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 Plan should not rely on microchipping as a method of discerning pet cats from feral cats.	Feral cats	Note	There are no Plan rules proposed requiring microchipping. However, the purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this. ORC will specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P302.3	Feline Rights New Zealand	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.	Toxoplasmosis is not used as a basis for inclusion of feral cats in the Plan.	Feral cats	Note	Toxoplasmosis has not been used as a basis for the inclusion of feral cats in the Plan.
P302.5	Feline Rights New Zealand	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 a explosion of the rat population which in turn has had a marked adverse Feline Rights New Zealand 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.	The ecological value of cats as a predator of pest species is recognised.	Feral cats	Note	Although it is acknowledged that cats control rodents and other pests, the impacts feral cats have on biodiversity in New Zealand is well documented. Other forms of rodent and pest control can be used in the Dunedin site-led areas to manage rodent problems, and the Panel notes that ORC staff can provide information and support to landowners on rodent control. The Dunedin site-led programmes are a multi-species approach to pest management in these areas and mustelids and rats are also proposed to be targeted. This multi-species approach means that any mesopredator effects can be minimised.
P303.1	B	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.	Remove feral cats from the plan.	Feral cats	Reject	See response to submission P013.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P304.1	Jason Cornell	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.	Remove cats from the plan.	Feral cats	Reject	See response to submission P013.1.
P306.4	Stephanie Ripley	My submission is that domestic cats should be included as a pest and managed. I like the ORC to fund desexing programmes and microshipping of domestic cats.	Include domestic cats as a pest to be managed by funding desexing and microchipping.	Feral cats	Reject	ORC has not carried out or been involved in the control of feral cats to date and the Panel considers a regulatory approach and enforcing rules at this time is not appropriate. Predator Free Dunedin, DCC, and ORC are looking at how feral cats can be managed in these areas. As this is the very early stages of ORC being involved, staff believe working alongside the community will achieve the desired outcomes. This is especially important where there are so many community members concerned about animal welfare and unintended consequences for their pet cats. As the focus of the site-led programmes are to support in the management of feral cats, and not domestic or stray cats, rules regarding domestic cats are not recommended. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this (such as trap, neuter release, microchipping, free or subsidised desexing etc). ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P307.1	Hanny Pantiasih	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.	Remove cats from the plan	Feral cats	Reject	See response to submission P013.1.
P308.3	Kevin Voges	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P308.8	Kevin Voges	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.	Feral Cats	Reject	See response to submission P128.3.
P310.7	Yellow-eyed Penguin Trust	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 ORC to support investigations by territorial authorities, such as the DCC into registering and microchipping domestic cats.	ORC to support investigations into registering and microchipping domestic cats	Feral cats	Note	See response to submission P026.1.
P311.1	Karen Anderson	I commend the ORC for the care taken to distinguish feral cats from other types, including identifying the deeply contested category of "unwanted" cats as part of its apparent commitment to clarifying the target is only feral cats. Take action based on distinguishing the existence of cats from the undesirable behaviour. That is, distinguish deed (provable behaviour) from breed (existence). That approach is consistent with the use of behaviour as one indicator in the description provided for feral cats.	Retain the emphasis on distinguishing feral cats from other types of cats, particularly temporary strays and companion animals.	Feral cats	Accept	A definition of 'feral cat' and amendments to Table 25 to clarify that the Plan applies to feral cats only, and not pet or stray cats, is recommended.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P311.2	Karen Anderson	Consider TNR as a successful tool for managing feral cat populations actually posing a threat, and recognise the support for allocating resources to that type of scheme. Note that may require an amendment of provisions that prevent a person from holding or releasing cats that might be feral. Ensure performance measures and accountability include successful outcome-focussed liaison with community groups with interests that are not site-specific to maximise the use of voluntary groups willing to assist with TNR. Ensure performance measures and accountability can extend beyond empirical measures (for example, counting the number of cats killed), to allow successful outcome-focussed liaison with community groups who can assist with TNR to be treated as an outcome achievement not a resource liability.	Consider trap, neuter and release programmes as a management method including liaison with community groups.	Feral cats	Note	See response to submission P026.1.
P313.10	Carrie Pritchard	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. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P313.8	Carrie Pritchard	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P314.1	Kathryn Jean Guthrie	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!).	Remove cats from the plan and fund trap, neuter and release programmes.	Feral Cats	Reject	See response to submission to P013.1.
P315.10	Andrew Davis	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. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P315.8	Andrew Davis	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P316.2	Yolanda van Heezik	Regarding cats, the ORC has limited its 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.	Include stray cats as a pest species in the plan. Oppose trap, neuter and release programmes.	Feral Cats	Reject	See response to submission P128.3. The purpose of the Plan and Strategy is not to recommend specific methods for support and control at this stage. As outlined in the Strategy actions, ORC will develop a plan of action for the Dunedin site-led areas which will set out ORC's role in the delivery of the site-led programmes in collaboration with the other organisations and the communities involved. This will include how ORC can provide support in the management of feral cats in these areas. The Panel notes that ORC staff will consider the requests provided in submissions when developing this (such as support and opposition for trap, neuter, and release programmes). ORC will also specify how Council will support the management of feral cats in the site-led areas in its Operational Plan. The on-line Pest Hub to be developed on ORC's website will also include helpful content on the management of feral cats. This will be developed within the next 12 months in accordance with the Strategy.
P318.10	Ben Teele	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. Any establishment of a cat colony has the potential to devastate native wildlife and should be explicitly prohibited under the plan.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P318.8	Ben Teele	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P319.1	Sandra Condon	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 !!!!!	Remove cats from the Plan.	Feral Cats	Reject	See response to submission P011.1 and P013.1.
P320.3	Bruce Jefferies	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3.
P320.8	Bruce Jefferies	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P323.1	Sandra Jane Condon	We strongly oppose cats included as pests. Cats are NOT pests !!!!! 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 !!!	Remove cats from the plan	Feral cats	Reject	See response to submission P013.1.
P324.3	Aspiring Biodiversity Trust	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.	Support inclusion of feral cats for site-led control. Supports microchipping	Feral Cats	Reject in part	Support for the inclusion of feral cats in the Dunedin site-led programmes is acknowledged. See response to submission P128.3.
P324.6	Aspiring Biodiversity Trust	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.	Feral Cats	Reject	See response to submission P128.3.
P327.1	Alex Kerr	I oppose cats being categorised as pests. Trap, Neuter, Rehome or Return and Manage has been proven internationally to be the only 'humane' way of dealing with feral and 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 excellent work.	Remove cats from the plan and fund trap, neuter and release programmes.	Feral Cats	Reject	See response to submission P019.1.
P337.3	Marion Mertens	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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats', with a definition of 'pest cat' adopted as "a cat without a registered microchip".	Feral Cats	Reject in part	See response to submission P128.3
P337.8	Marion Mertens	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.	The Council should add rules about feeding cats or establishing cat colonies in public places or without the express permission of the land owner.	Feral Cats	Reject	See response to submission P128.3.
P338.8	Kawarau Station Limited	Feral Cats and Ferrets - not a problem as such. I, in fact, still believe they have a place in the controlling of Rabbits.	No specific relief requested.	Feral Cats	Note	No specific relief is requested. The submitter's information regarding feral cats and ferrets in this area is noted.
P67.8	Arrowtown Village Association	We 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.	Support inclusion of feral cats for site-led control. Seeks the plan is amended from 'feral cats' to 'pest cats'.	Feral Cats	Reject in part	Support for the inclusion of feral cats in the Dunedin site-led programmes is acknowledged. See response to submission P128.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S006.1	Aleisha Bain	I oppose feral cats being classed as a pest on this proposal and do not believe they should be on the list. Some circumstances with cats and defining a feral cat from someone's actual pet is too much of a grey area and could lead to serious misuse of this proposal as well as provoke the public, especially those for cats. I agree that feral cats is a problem that needs to be managed but this is not the answer.	Remove feral cats from the Plan	Feral Cats	Reject	See response to submission P013.1.
S009.1	Hannah Lowe	I oppose the inclusion of 'feral cat' in the pest category!	Remove feral cats from the Plan	Feral Cats	Reject	See response to submission P011.1.
S010.1	Kiran Hunt	I think it is wrong what the council wants to do, how are you going to know the difference between wild cats and peoples pets. Laying poison/traps and/or shooting them is wrong and you will be potentially killing peoples pets	no specific relief requested.	Feral Cats	Reject	See response to submission P013.1.
S015	Elizabeth Guthrie Higbee	I don't want cats to be included in the pest management strategy. It is too difficult to distinguish feral cats from domestic companion animals and many people love cats. I prefer to support Trap Neuter and Release strategies.	Remove feral cats from the Plan and focus on education, and a trap, neuter and release programme.	Feral Cats	Reject	See response to submission P019.1.
S016.5	Catherine Brigham	ORC or DCC should cover cost of desexing all cats/pet cats for free - this would make a huge difference FREE DESEXING FOR CATS	Free desexing for cats.	Feral Cats	Reject	This is an implementation matter. See response to submission P026.1.
P012.1	Ezekiel Faigan	I oppose the inclusion of 'feral cats' and hedgehogs in the pest category	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	The intention of including hedgehogs and feral cats in the Plan is to support Predator Free Dunedin and the West Harbour and Otago Peninsula communities in controlling feral cats and hedgehogs where they impact on biodiversity values. The impacts of feral cats and hedgehogs are described in Table 25 of the Plan. The Panel notes that no rules are included in the site-led programmes requiring land occupiers to destroy feral cats and hedgehogs, however where they are predated on native species in the site-led areas, ORC can support the communities with different methods to control them. The Panel notes that the hearing report provides a more fulsome assessment of submissions regarding hedgehogs and feral cats.
P024.1	Cassie Prescott	I oppose both the new Pest Management plan and Biosecurity Strategy when it comes to feral cats and hedgehogs as pests. I own two cats, live in a country town and would be absolutely gutted if something was to happen to them. Instead of killing the animals why not focus your energy and budget on supporting those trapping, neutering and trying to manage the population of feral cats in a more humane way. This just opens up too many ways that peoples loved animals could be killed. What if it was your animal that it happened to? Would you be ok with that? Humans are the reason these animals are breeding out of control. It is not their fault that the human race sucks. They shouldn't be punished because of us!	Remove feral cat and hedgehogs from the Plan and focus on trapping, neutering and humane management.	Feral Cats and Hedgehogs	Reject	See responses to submissions P012.1 and P019.1.
P138.9	Jennifer Thomas	I do not believe either cats nor hedgehogs should come under the category of pests. Cats can not be differentiated between being some ones loved pet or a stray. To this end all cats should be trapped and sent to pet rescue to be assessed and rehabilitated if they are a stray to be able to become tamed, desexed and a viable pet	Remove feral cats as a pest. Instead focus on a trap, assessment and release programme through Cat Rescue.	Feral Cats and Hedgehogs	Reject	See responses to submissions P012.1 and P019.1.
P168.1	Jackie Jane Thomas	I am very much opposed to you targeting cats and hedgehogs as pests.	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.
P169.1	Rosemary Manjunath	Cats and hedgehogs should not be classified as pests. It is difficult to distinguish between a feral cat and a domestic cat and pets would be at risk Please do not include cats and hedgehogs	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P179.1	Melissa Mcgrannachan	I personally don't agree that feral cats and hedgehogs should be on the cull list. We live on the outskirts of Dunedin and our cat brings home rats and field mice. The odd occasion he gets a black birds but see that overall it is better for the environment and bird life. I see if feral cats are put on the pest list how is this going to be controlled so domestic cats arent disposed of.	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P186.1	Jennifer Seyb	Cats and hedgehogs should not be included in pest management	Remove cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.
P187.1	Mike Wheeler	I support adding hedge hogs and feral cats to the list of pests on the pest control management plan. There is a lot of fear monger I g amongst cat owners mainly inner city ones on some Facebook pages who have not spent the time to read the document in its entirety. I really hope you disregard inner city dwellers opposing this because they're scared you will shoot their cat.	Support the inclusion of feral cats and hedgehogs in the Plan.	Feral Cats and Hedgehogs	Accept	The submitter supports the inclusion of feral cats and hedgehogs in the Plan.
P196.1	Kylie Milne	I do not agree to cats or hedgehogs.	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.
P197.1	Sandra Howell	I Sandra Howell strongly oppose cats an hedgehogs being put on the pest considered list	Remove feral cats and hedgehogs from the Plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P230.1	Cat Rescue Dunedin	4.1 Table 2 Organisms declared as pests Cat Rescue Dunedin do not support list of animals declared as pests. We oppose inclusion of feral cats and hedgehogs to the list. I suggest council reject the list of animal pests as listed in the plan. Description of Feral cats p.64 We oppose the inclusion of feral cats for site-led control. Cats, whether owned or uncrowned can not be treated as pests. Cats are companion animals, lately we see a lot of cruelty towards cats. Every week there is at least one article on Stuff about another heartbroken family's losing their bellowed pets to a cat haters attacks. Enough is enough, this country treating animals declared as pest with horrific cruelty! We must protect our cats and studies suggest that the only effective method of control for feral or wild cats is TNR (trap-neuter-return) We suggest council to look into allocating funds to rescue organisations who already made a significant impact on wild cats population in Otago like Cat Rescue Dunedin and Queenstown Cat Rescue.	Remove cats from the plan. Provide funding to rescue organisations for trap, neuter and release programmes.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P019.1.
P235.1	Tracey Burrell	I am against having cats and hedgehogs listed as pests! You need to make deserving cheaper so more people can afford to get it done! Maybe people should register cats, but please don't kill them!	Remove cats and hedgehogs from the plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P244.1	Jane Marie Hughes	Feral cats and hedge hogs should not be included as pests on the Regional Pest Management plan. Also what is a feral cat and how can you tell the difference between a domestic cat and a feral cat? Relying on microchips is not a good option as they can be faulty and because of this the end result could be disastrous. Somebodies pet could be inadvertently euthanised. This is inhumane and unjust and I resent paying money to an organisation that would endorse this. Identifying cats as pests is in sighting violence towards cats and is not acceptable.	Remove cats and hedgehogs from the plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P299.1	Andrew Hornby	Cats and hedgehogs are not pests, we take care of the ones the come to our home as they are part of our eco system and therefore have the right to be here. If we start forcibly eliminating species just because we think we can it will affect the natural order of things in the long term. Passing this ridiculous proposal would be a huge mistake by allowing anyone to just kill or harm wildlife, they have no right to do that and we should not be encouraging them to do so.	Remove cats from the plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P305.1	Geoffrey Barnett	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	Remove cats from the plan.	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
P322.1	Ann Reynolds	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'.	Remove feral cats from the plan	Feral Cats and Hedgehogs	Reject	See response to submissions P012.1 and P013.1.
S004.1	Angela Gardiner	I'm concerned that hedgehogs and feral cats are on your pest plan as something to be exterminated. Cats populations can be managed and hedgehogs are harmless, I really don't understand why they're on your list. I suggest you talk with local spca and cat rehoming charities to understand Dunedin's feral cat needs. Not impressed	Remove cats and hedgehogs from the Plan	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.
S005.1	Ezekiel Faigan	I oppose the inclusion of 'feral cats' and hedgehogs in the pest category	Remove cats and hedgehogs from the Plan	Feral Cats and Hedgehogs	Reject	See response to submissions P011.1 and P012.1.
S007.1	Charlotte Sorensen	Absolutely disgusting how they're now going to target Feral Cats and Hedgehogs. Absolutely ashamed	Remove cats and hedgehogs from the Plan	Feral Cats and Hedgehogs	Reject	See response to submission P011.1 and P012.1
P076.1	Scott Kunac	Feral deer are a recreation resource and the ORC should recognise this.	Feral deer should not be included as a pest in the Plan. Clean our rivers if you are looking for something worthwhile to do.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DOC. The reason for their inclusion in the Dunedin site-led programmes is to ensure that ORC can support communities and other organisations (such as DOC) in controlling feral deer in these areas where this is needed to protect biodiversity values. Feral deer are not currently present in the site-led areas and including deer in the Dunedin site-led programmes means ORC can support DOC or other agencies with undertaking an incursion response if deer are ever found to be present. Although deer are categorised as a 'game animal' in the Game Animal Council Act 2013, 'feral' is defined in the Plan, and the Plan does not propose any rules for feral deer that would be inconsistent with this Act.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P127.1	New Zealand Deerstalkers Association Inc Upper Clutha Branch	Feral deer have value to the community as a game animal resource capable of being managed in a sustainable way, providing recreational opportunities and an economic return, and their designation as a 'pest' is inappropriate.	Remove feral deer from the Proposed Pest Plan.	Feral Deer	Reject	See response to submission P076.1.
P127.2	New Zealand Deerstalkers Association Inc Upper Clutha Branch	We note the scientific names of the deer varieties listed in the Schedule vary from the description of Feral deer listed on Table 25 Page 68. Here all deer species are listed whereas Table 2 only identifies red deer, sika deer and fallow deer. Sika deer do not exist in the South Island – neither do Rusa or Sambar (not samba – the Brazilian dance music version, as suggested in the Schedule).	No specific relief requested.	Feral Deer	Accept	Amendments are recommended to Table 25 to remove reference to sambar and rusa deer.
P162.1	Logan Chandler	I do not think Deer should be added to the pest management plan. As both a recreational hunter and having worked on farms as well as knowing a lot of Otago farmers, I simply cannot understand how they are lumped in with rabbits etc. It is often the case that hunting deer on public land is hard enough anyway with the pressure from the public and the fact that DOC target them already.	Remove feral deer from the Plan.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. See response to submission P287.1.
P163.1	Trevor Fredericksen	In relation to the proposed Otago Regional Pest Management Plan I oppose the councils objective of including deer as a pest. Deer are considered game animals and are responsible for generating millions of dollars in revenue for various businesses throughout New Zealand. They sre also a source of food for many families in NZ.	Remove feral deer from the Plan.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. See response to submission P287.1.
P164.1	Benjamin Galey	The Otago Councils inclusion of deer in their pest management scheme is a knee jerk reaction to a minimal threat to our ecosystem. Deer have enormous social and economic value not only to otago but the whole of New Zealand. In conclusion having deer as part of your pest control scheme will have a detrimental affect to the recreation of Kiwis, comercial hunting and hunting tourism	Remove feral deer from the Plan.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. See response to submission P287.1.
P180.1	Kevin Patrick Joseph Raukawa O'Neill	I am opposed to addition of deer to the "regional pest management plan" i feel it can be managed by other groups and the community. I am in favor of taking deer off the list.	Remove feral deer from the Plan.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. See response to submission P287.1.
P193.1	Central Otago Recreational Users Forum	CORUF is concerned at the placement of feral deer in the "new pest" category of the Otago Regional Council draft management plan. We understand Government is moving to recognise deer as 'Wild animals and as a recreational resource' not as a pest. It is understood that when Game Animal Council was set up, there would be a change of status. As a recreational group we recognise deer hunting as a legal recreation and are concerned the move of deer to pest status in Otago will allow ill considered poison operations to be used and may give WARO, Wild animal recovery operators the means to lever for granting of concessions. The Department of Conservation have not considered deer to be a problem and are happy to allow recreational hunters to be their management tool in Otago. There are no WARO operations in Otago. Our preference is for the use of the recreational hunters to manage animal numbers, which will allow taken animals to be used instead of littering the Otago Landscape with rotting carcasses. REASONS Use of poisons will leave wasted rotting carcasses about the country side. Hunting gives opportunities and challengers for our younger community members to get outdoors. This is a very family orientated Kiwi recreational activity. Hunting ethics of today will see harvesting and use of the animals taken. Recreational hunting has been researched as the most effective tool for controlling deer numbers and is also the most cost effective. There is very little country that could be deemed too rough for a man/woman carrying a gun. Land owners should be encouraged to allow hunting on their property and particularly where there is Conservation land behind. If placing feral deer in the pest category to the detriment of a nation wide kiwi recreation, is simply to get a local cull operation allowed, we have to ask you to consider the alternative below. NZDA (New Zealand Deerstalkers Association) have started up a "farmer assist" programme promising landowners a hunter with behaviour and performance guaranteed. This scheme should be viewed and encouraged as a new management tool with possibly no cost to the rate payers.	Remove feral deer from the Plan.	Feral Deer	Reject	Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. See response to submission P287.1.
P202.1	Brendon Voyce	The Wild Animal Control Act 1977 already regulates and empowers DOC to manage this, Inclusion means same status as rabbits and stoats and does not recognise the significance of deer to local hunters and communities. The Game Animal Council is a stautory body that has a role to manage game animal, including it as a pest is not recognising this statutory body Wild deer have value to the community as game animal resource and capable of being managed by other statutory bodies and that the designation as pest is inappropriate.	I think Deer should be e removed off the proposed pest list	Feral Deer	Reject	See response to submission P287.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P262.1	Southern Lakes Deerstalkers Association	Consultation Process: First we would like to note that as an important stakeholder regarding changes to deer status and after reading the document "Summary of consultation undertaken on the development of the proposed Regional Pest Management Plan and proposed Biosecurity Strategy", there were no hunting groups, neither the Game Animal Council or the local branches of the NZDA invited for consultation. We are disappointed only 2 meetings were held in our Queenstown area – none of them for us and that the remaining majority were held in Dunedin, 3.5 hours' drive away. Therefore, regardless of the outcome, we would like the opportunity to be consulted and included in ANY future management plan proposals or changes to classification of deer. We would also like to be noted that most hunters are tradesmen or in "physical activity employment" and not accustomed to writing submissions; so please consider the quality of submissions representing large hunting communities rather than the volume of submissions against the proposals. Had a hunting liaison group be offered. I'm confident there would have been much more noise over the proposals.	Pre-consultation on the plan should have involved hunting groups, the Game Animal Council and local branches of the NZDA as stakeholders.	Feral Deer	Note	No targeted consultation was undertaken with the groups referred to in the submission as the inclusion of feral deer in the Plan relates to the Dunedin site-led programmes only. Feral deer are not currently present in the site-led areas and including deer in the Dunedin Site-led programmes means ORC can support DOC or other agencies with undertaking an incursion response if deer are ever found to be present. This does not affect the recreational hunting of deer in Otago. ORC will ensure to consult with the Game Animal Council, the NZDA, and interested hunting groups where this relates to any future changes to the classification of feral deer in the Plan where this impacts on recreational hunting.
P262.2	Southern Lakes Deerstalkers Association	Recreational Activity: One main reason for our submission is that hunters consider deer to be a valuable resource, not only for game parks where they attract overseas income as a trophy animal; but for the Otago hunting fraternity which is very active and attracts a higher than normal percentage of the population than other parts of the country. Hunting; and deer is regarded as a valuable resource and a healthy reason to go out and enjoy the outdoors (often in areas not used by other recreations) where the meat is harvested for themselves and their families. In this day and age where obesity and poor health drains resources on entities like ORC, any recreation that encourages fitness and healthy activity should surely be considered a plus. By including the designation of deer as 'feral' or 'pests' it pays poor regard to the esteem these animals are held in by a significant portion of the community. It also fails to recognize the status they have been awarded in recent years by DOC to upgraded them to 'game animals'; and as a recreational resource rather than vermin, that are capable of being managed in a sustainable way. The NZ Deerstalkers Association has recently initiated the Farmer Assist programme – a free service developed to enable farmers with wildlife management issues to seek pest control assistance from licensed and insured NZDA members. (Sadly, there has been a very poor uptake in the scheme from the farming community – a little interest for rabbit and wallaby control, but nothing for deer. That also suggests deer are valued by farmers.)	The Plan recognise the recreational value of Deer.	Feral Deer	Accept	Feral deer are of recreational value to hunters in Otago and New Zealand. An amendment to the description of feral deer in Table 25 of the Plan to recognise their recreational value is recommended.
P262.3	Southern Lakes Deerstalkers Association	The Wild Animal Control Act 1977 and, the recent Game Animal Council Act 2013 recognize deer as a recreational resource i.e. Game Animal and not as a pest. We would argue that there are already mechanisms in place to control the deer populations, and the Department of Conservation work closely with the hunting community to ensure numbers are managed. We don't believe there is any benefit having the ORC involved in yet another management plan. Therefore, if feral deer are removed from the pest designation then ORC is not obliged to manage them and they can rely on the GAC and DOC to manage this valuable resource and place resources better used for feral rabbits, cats, rats, mice, possums and stoats. We do agree that feral cats should be an addition to the pest list as we know how they can effect a bird population. Hunters have no qualms about shooting feral cats if out hunting as they know they are not supposed to be there. In addition, the plan says "The Biosecurity Act 1993 is purpose-built for pest management. A regional council can use the Biosecurity Act to exclude, eradicate or effectively manage pests in its region, including unwanted organisms." Including Deer as pests brackets them as "unwanted" which is far from the truth in our eyes; and we are concerned this opens the door to indiscriminate poisons and a mechanism for potential eradication of a valuable resource.	Feral Deer should be excluded as a pest animal, and managed by the Department of Conservation and the Game Animal Council.	Feral Deer	Reject	See response to submission P287.1.
P262.4	Southern Lakes Deerstalkers Association	Inconsistencies: We did also note a few inconstancies in the ORC proposal plan too: Under section 2.2.5; "The Wild Animal Control Act 1977 (WAC Act) controls the hunting and release of wild animals and regulates deer farming and the operation of safari parks. The Wild Animal Control Act 1977 empowers the Department of Conservation to control wild deer, chamois, that, wild goats and wild pigs." If ORC therefore argue that by including deer as a pest then they are consistent with other management plans and legislation, then why are Chamois and Tahr not included as new additions (or do ORC consider these as "game animals"?). We know there are Chamois and Tahr present in some areas of Otago and according to the recent public and highlighted Tahr Management Plan, where their numbers were set and there is a plan in place to control them, this does not allow Tahr in Otago. As a side note, Tahr as a hunting resource received huge support from the public, and Conservation Minister Eugenie Sage was forced to relook at her plans for the eradication of them. I'm sure if eradication of deer was mooted by ORC then the general public too would rally round and oppose the proposals in big numbers.	Feral Deer should be excluded as a pest animal, and managed by the Department of Conservation and the Game Animal Council.	Feral Deer	Reject	See response to submission P287.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P262.5	Sharon Salmons	Secondly the plan classification of deer says: Feral deer Cervus elaphus, C. nippon, C. dama. To the layman this is Red deer, Sika and Fallow – Sika are not present on the South Island at all, so not sure why they would be included? Thirdly, from current DOC policy which manage these animals. The Game Animal Council is a statutory body established on 28 November 2013 under the Game Animal Council Act. It represents the interests of the hunting sector and improves the management of hunting resources while contributing to positive conservation outcomes. The goal of the Game Animal Council is improving the management of deer, chamois, tahr, and wild pigs. These animals will be defined as "game animals". The only species of wild animal under the Wild Animal Control Act 1977 that will not be a game animal under the new Act is goat. Therefore, in summary the classification of "feral" and "pests" is inconsistent with the Game Animal Council Act 2013 which regards deer as "game animal" and a valuable resource. In section 2.3.1 "The Proposal must not be inconsistent with: (a) any national pest management plan or regional pest management plan that is focused on the same organism; or (b) any regulation". The ORC plan also states: "Its purpose is to provide for the eradication or effective management of harmful organisms. A harmful organism is assigned pest status when it is included in a regional pest management plan. While a regional council may initiate a regional pest management plan, it is also required to assess and undertake decision-making responsibilities in relation to all proposed pest management plans put forward by any another person or organisation" We argue the Game Animal Council and DOC, not ORC is tasked with putting forward a proposed deer (not pest) "management" plan. Therefore, in the actual words in section 2.3 we suggest that "...If the organism is not in the Proposal, then there is no inconsistency."	Feral Deer should be excluded as a pest animal, and managed by the Department of Conservation and the Game Animal Council.	Feral Deer	Reject	See response to submission P287.1.
P287.1	Alasdair Gay	I am very concerned at the placement of feral deer in the "new pest" category of the Otago Regional Council draft management plan. As I hunter I find it hard to see that wild deer are anywhere near the levels of being a pest on public land. The densities are far hard on private farm land and reducing those numbers would do very little for biodiversity as they would often just be replaced by high stock numbers. Placing wild deer on a pest list will just open the door to more poisoning and or WARO options and its just the start or the process in trying to eradicate them from NZ. We need to start understanding that a managed heard is resource not a liability. 1000s of kiwis enjoy hunting and putting great food on the table. In a time when our kids have more and more options to stay in doors and sit in front of screens, we should be trying to find ways to entice them into the outdoor. Not give them less reasons to do so. It's my understanding that the science behind eradicating large herbivores to increase biodiversity is weak. NZ habitats have evolved with large herbivores, just not deer. It would make sense then that the habitat would need large herbivores to stay strong and diverse. It is my understanding that modern research is starting to realize this.	Remove feral deer from plan	Feral Deer	Reject	It is recognised that feral deer are of recreation value to hunters. However, feral deer are included in the Dunedin site-led programmes only, and there are no rules in the Plan requiring land occupiers to control feral deer throughout Otago. Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. The reason for their inclusion in the Dunedin site-led programmes is to ensure that ORC can support communities and other organisations (such as DoC) in controlling feral deer in these areas where this is needed to protect biodiversity values. Feral deer are not currently present in the site-led areas and including deer in the Dunedin site-led programmes means ORC can support DoC or other agencies with undertaking an incursion response if deer are ever found to be present. Although deer are categorised as a 'game animal' in the Game Animal Council Act 2013, 'feral' is defined in the Plan, and the Plan does not propose any rules for feral deer that would be inconsistent with this Act.
P338.5	Kawarau Station Limited	Feral Deer - Not a problem as such, other than controlling hunters. Deer have increased slightly since the introduction of Deer Farming especially in the Roaring Season.	No specific relief requested.	Feral Deer	Note	No specific relief is requested. The Panel notes that the submitter's information regarding deer on their property provides useful information to assist ORC staff in understanding issues with deer management in this area.
P229.1	Sheila Chappell	Feral Goats have a totally disasterous impact on the environment here in Fernhill, Queenstown. As a resident of the area who has been faced with the continual problem of feral goats, I have been communicating with QLDC for a number of years. I also approached ORC but was informed as they were not classified as a pest nothing could be done. QLDC authourised a cull in March up near Ben Lomond followed by one in July to help reduce the numbers. Unfortunately the numbers are still horrific. I (personally) have anuthing from 6 to 25 goats on my property at any one time; this is a daily occurence, totally destroying my native flora. They are also destroying the native flora in the upper slopes around the region. I have been a permanent resident of Queenstown for 42 years and I am passionate about our precious environment. I would appreciated it if you could phone me to discuss this issue further.	Feral Goats should be included as a pest animal and further, regular culling is required.	Feral Goats	Reject	See response to submission P263.15.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.15	Queenstown Lakes District Council	Feral goats - Proposed site-led programme. The following paragraphs provide an explanation for the inclusion of a feral goat site-led programme in Queenstown: Feral goats have been present in the Queenstown surrounds for many years. In the past, small control operations have been undertaken to keep numbers down; however the presence of feral goats has rebounded within a short timeframe. At present, feral goats are widespread throughout the Queenstown fringes and the current populations are high. The feral goats are habitualised to the presence of humans, buildings and vehicles, and have been the cause of many hundreds of complaints from the public with regard to the invasion of private land and roads, and their impact on vegetation. The Gorge Road area is the gateway to Queenstown when approaching from Arthur's Point. Feral goats are present within the land area and found on Queenstown Hill and Ben Lomond Station. The goats wander between the two locations, crossing the road, endangering motorists, and destroying native planting as they go. There are over 10 properties situated within the Gorge Road area where feral goats reside.... The QLDC considered the alternative of relying solely on voluntary action without ORC support. However, this is not considered viable due to the nature of the pest, the size of the area, the effectiveness of voluntary action, and the need for a collaborative inter-agency approach, especially given the benefits of control action include the wider community.	An additional site-led programme to manage feral goats for Ben Lomond, Bowen Peak, Queenstown Hill and Gorge Road (Fernhill to Arthurs Point).	Feral Goats	Reject	A site-led programme for the Queenstown area may be established in the future once a management plan has been developed between the ORC, QLDC, DOC and other relevant parties which clearly sets out the management approach, the roles of the relevant parties, and how it will be resourced for the duration of the programme. Feral goats should be managed in accordance with the Wild Animal Control Act 1977 in the first instance, however the Panel agrees that further work with the parties listed above is needed to determine the best approach for the Wakatipu area. Therefore, the Panel does not recommend to include a site-led programme at this time. However this could be considered in the future.
P263.16	Queenstown Lakes District Council	1. Point 6.5.8 (page 80): an additional site-led programme is added for Ben Lomond, Bowen Peak, Queenstown Hill and Gorge Road (Fernhill to Arthurs Point). 2. The objective over the duration of the Plan is to sustainably control feral goats by providing ongoing control to reduce their impact and spread in the areas identified. 3. The principal measures to be used are: ORC will take a lead role in supporting the formation of a group of stakeholders, landowners and the community to bring about the desired level of environmental protection to the site. Appropriate measures are drawn from the suite of activities listed under collaboration, requirement to act, Council inspection, service delivery, advocacy, and education. 4. We do not propose introducing occupier control responsibilities at this stage. However, it may become necessary in the future to maintain public investment or where lack of cooperation could jeopardise achieving the objectives. How the ORC intends to deliver these objectives with the community will be described in a management plan for the area as recommended in the Biodiversity Strategy. 5. Proposed change to Plan Rule 6.5.6.1: The proposed wording is that no person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Ben Lomond, Bowen Peak, Queenstown Hill, Gorge Road area any a) feral goat. A breach of this rule creates an offence under section 154N(19) of the Act. For the purpose of this rule, places include any building, conveyance, craft, land, or structure.	An additional site-led programme to manage feral goats for Ben Lomond, Bowen Peak, Queenstown Hill and Gorge Road (Fernhill to Arthurs Point).	Feral Goats	Reject	See response to submission P263.15.
P267.6	Arrowtown Village Association	We would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. There rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. We suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P268.5	Fiona Rowley	I would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. Their rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. I suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P273.1	Neil John Kinniburgh	Organisms declared as pests. Sect 4.1 - Feral Goats My submission is that: I SUPPORT the inclusion of feral goats as pest animals. Goats are an introduced species and cause a large amount of environmental damage to our native flora. In particular the feral goat population in rural Queenstown is now infiltrating the suburbs. Active eradication is necessary. I have attached a video of feral goats rampaging through a residential section in Greenstone Place Fernhill.	Support the inclusion of feral goats.	Feral Goats	Reject	See response to submission P263.15.
P282.6	Duncan Keenan	I would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. Their rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. I suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P283.6	Wakatipu Reforestation Trust	We would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. There rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. We suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P313.6	Carrie Pritchard	I would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. Their rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. I suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P315.6	Andrew Davis	I would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. Their rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. I suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P318.6	Ben Teele	I would like to see the addition of goats to the list of pests to be managed under sustained control programmes and for the ORC to have a plan for working with landowners, government agencies, and local councils to contain their spread. Their rate of relatively uncontrolled spread is resulting in significant loss of biodiversity in the Wakatipu area. I suggest the Council adds feral goats to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add feral goats to the animals managed under the sustained control programme.	Feral Goats	Reject	See response to submission P263.15.
P118.1	Terry Gaze	Provision / Section 6.4 I do not support Feral Rabbits to be included in this section. Feral Rabbits should be included in section 6.3 with progressive containment. The extent to which feral rabbits are encroaching across Otago shows earlier efforts to contain populations have failed. More aggressive culling and reduction needs to occur. Eradication is not likely, however significant reduction is a plausible goal.	My precise decision for ORC to make - move the Feral Rabbit pest to section 6.3.	Feral Rabbits	Reject	Feral rabbits are included as a pest to be managed under a Sustained Control Programme. The proposed rules include Good Neighbour Rules to control spread across boundaries and rules for land occupiers to control rabbits to MacLean Scale 3. This is consistent with neighbouring regional councils and other regional councils nationally. The Panel notes that the Cost Benefit Analysis accompanying the Plan does not assess and compare the costs and benefits of managing rabbits through a Progressive Containment programme, but these costs will be higher than the proposed sustained control programme, and containment areas will likely need to be identified. As rabbits are widespread across Otago, the Panel is satisfied that a sustained control programme is considered the most appropriate programme.
P182.4	Federated Farmers of New Zealand	FFNZ recommends that ORC is more proactive regarding control of rabbits. 11. We have received feedback from our members, that not enough has been done by council about the control of rabbits. There appears to be a lack of co-ordination and no strategic approach, resulting in the rabbits either being driven from one property to the next or merely repopulating a previously cleared area. Undertaking a district approach would have a better outcome than focussing on individual properties.  12. Like the earlier comment regarding wallabies, an engaged and collaborative approach is required for rabbit control. Federated Farmers is always willing to work with Council and other landowners to find the best outcome.	Seek a coordinated and collaborative approach for rabbit control.	Feral rabbits	Note	ORC's website contains information on managing rabbits and a key project identified in the Strategy is to 'Develop a programme to facilitate the establishment of landowner-led rabbit control groups. This shall be modelled on best practice examples within Otago and other regions'. The intention of developing this programme is to support communities in managing rabbit numbers.
P213.3	Diana Noonan	I wish to management plan to acknowledge the problem of escalating rabbit populations in semi-rural areas (such as in my village of Papatowai). Currently, there is no shooting of rabbits permitted in built-up areas, even semi-rural ones, and rabbit populations build up quickly as a result. Not only is my household reliant on an extensive food garden (we are 70% self sufficient in food production) but garden writing is also my income, and the rabbit population impacts on this.	Address escalating rabbit populations in semi-rural areas.	Feral rabbits	Note	ORC's website contains information on managing rabbits and acknowledges the issues with rabbit control in urban and peri-urban areas. In these areas, rabbit proof fencing is the most effective tool to restrict spread into properties and ORC staff can support land occupiers with technical advice about the best ways to manage rabbits on their properties. We sought further information from staff in Minute 6 and we are satisfied that there are a number of additional tools available to provide additional support to landowners, particularly in urban and 'peri-urban' areas. We recommend that Council acknowledges and notes the available tools that sit outside the Plan process that could be useful in providing additional support to land occupiers, particularly in urban and 'peri-urban' areas for rabbit control.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P249.2	Matarae Station	6.4.6: Sustained Control Programme for feral rabbits. Support the control feral rabbit programme but amendment is required to link this programme with 6.4.3 (Broom and Gorse). This programme has a high interdependency with the controlled broom and gorse programme. Broom and gorse support an ideal breeding environment for the feral rabbit population making eradication difficult. To ensure that controlled virus releases have the highest impact on the rabbit population ORC needs to ensure it is released at the optimal time of the year for maximum benefit.	Recognise the interdependency that the Sustained Control Programme for feral rabbits has with the controlled broom and gorse programme and ensure controlled release viruses are released at the optimal time of year.	Feral rabbits	Note	ORC follows best practice to ensure that controlled released viruses are released at the optimal time of year and acknowledges the role of gorse and broom in providing habitat for rabbits. The rabbit information on ORC's website recommends modifying habitat (such as removing shrubs and bushes) to better manage feral rabbit numbers.
P263.14	Queenstown Lakes District Council	Rabbits: We suggest that more resources are dedicated to communicating, informing and educating the public on the problem of rabbits, and how the Pest Management Plan will respond to rabbit infestations on smaller land parcels.	More resources committed to public education on rabbits.	Feral rabbits	Note	ORC's website contains information on managing rabbits and acknowledges the issues with rabbit control in urban and peri-urban areas. In these areas, rabbit proof fencing is the most effective tool to restrict spread into properties and the Panel notes that ORC staff can support land occupiers with technical advice about the best ways to manage rabbits on their properties. We sought further information from staff in Minute 6 and we are satisfied that there are a number of additional tools available to provide additional support to landowners, particularly in urban and 'peri-urban' areas. We recommend that Council acknowledges and notes the available tools that sit outside the Plan process that could be useful in providing additional support to land occupiers, particularly in urban and 'peri-urban' areas for rabbit control.
P266.16	Lindis Pass Conservation Group Inc	6.4.6 Sustained control programme for feral rabbits: Feral rabbits have begun to appear at altitude, on land that in the past has had only hares. Rabbit scrapes and holes are now found in the Lindis Pass Scenic Reserve, below the level of the pass itself (below about 900m) on both sides of the Pass. Re rabbit infestations, we support the view of the Council that the regional community will benefit through environmental values being protected. We know of no justification for rabbits remaining.	ORC to keep watching brief on rabbits now moving into the Lindis Pass Scenic Reserve area and upland Conservation Areas, and to allow for rabbit control should their presence rise above 3 on the Modified McLean Scale.	Feral rabbits	Note	ORC actively monitors rabbit numbers in the region and notes that this will include the Lindis Pass on the Otago side. Within scenic reserves and conservation areas, Good Neighbour Rules apply to Crown land.
P280.1	Jan Wheeler	Rabbit rules 6.4.6: Area and scope of our Rabbit Problem in the Moeraki Village and surrounding areas. The rabbit population is quite out of control along the Coastal area from Moeraki Peninsula to North of Waianakarua. My first request Plan A. -would be for ORC TO LOBBY Central Govt to reinstate Pest Destruction Boards which were very effective until the 1990s, they would create jobs for NZ people, and Would be very cost effective over all areas - in comparison to the loss to the economy of huge pest populations in productivity, less to be spent on Benefit Payments, And The danger to our NZ Biosecurity and there are many other benefits to this plan.	As a primary preference, Council lobby to Central Government for the reinstatement of Pest Destruction Boards.	Feral rabbits	Reject	The establishment of a pest destruction board is outside the scope of the Plan. We note that Central Government disbanded PDBs in 1989 and are not likely to reinstate when Biosecurity Act legislation provides for pest management options.
P280.2	Jan Wheeler	My Plan B request that the ORC make provision for 'specific case area treatments' - like the rabbit infested Village of Moeraki for example, where to have specific measures / plans put in place to eradicate the present explosion of the rabbit population is presently necessary. Locals are not able to safely shoot rabbits in the Village, all plantings are quickly eaten off, and locals vegetable gardens are now being elevated and fenced off, but still the rabbits jump up to graze the growing Vegetables. These local rabbit numbers did not decrease during the release of the Rabbit Virus in April/May 2018. Such major populations of pests must be dealt with when necessary within the ORC Territory as individual people cannot safely take matters into their own hands in a populated village area.	As a secondary preference, Council provide for site specific, coordinated treatment of pest rabbits in areas like Moeraki.	Feral rabbits	Reject	ORC's website contains information on managing feral rabbits. Feral rabbit control is the responsibility of the land occupier and the Panel notes that ORC staff can support land occupiers with technical advice about the best ways to manage rabbits on their properties. Additionally, a key project identified in the Strategy is to 'Develop a programme to facilitate the establishment of landowner-led rabbit control groups. This shall be modelled on best practice examples within Otago and other regions'. We sought further information from staff in Minute 6 and we are satisfied that there are a number of additional tools available to provide additional support to landowners, particularly in urban and 'peri-urban' areas. We recommend that Council acknowledges and notes the available tools that sit outside the Plan process that could be useful in providing additional support to land occupiers, particularly in urban and 'peri-urban' areas for rabbit control.
P285.6	Ernslaw One Ltd.	Plan Rule 6.4.6 Feral Rabbits. We support the proposal for land owners to ensure population levels do not exceed Level 3.	Retain rule 6.4.6	Feral rabbits	Accept	The submitter supports the feral rabbit rules in the Plan.
P312.21	Land Information New Zealand	Section 6.4.6 Sustained control programme for feral rabbits: 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.	Feral rabbits	Accept	The submitter supports the feral rabbit rules in the Plan.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P312.22	Land Information New Zealand	Plan Rule 6.4.6.2 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 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</del> <u>that</u> boundary.	Feral rabbits	Accept	The amendment sought in the submission will simplify the rule.
P312.23	Land Information New Zealand	Plan Rule 6.4.6.3 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: 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</del> a control operation involving bait <del>is being planned</del> or <u>where a control operation involving bait is being undertaken</u> on the property to manage feral rabbits.	Feral rabbits	Accept	The amendment sought in the submission will improve clarity.
P329.3	Maniototo Pest Management Incorporated	Maniototo Pest Management Incorporated seeks an exemption to Objective 6.4.6 Sustained control programme for feral rabbits as set out in Section 78 of the Act. Application for exception to rules relating to the District Plan's Pest Management in Maniototo by Maniototo Pest Management Incorporated (MPMI)... 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 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 MPMI management. Based on the above information MPMI 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.	MTPI requests 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.	Feral Rabbits	Reject	We heard from the submitter at the hearing that it seeks a variation to the requirement to meet the McLean Scale 3 in favour of McLean Scale 4 as a trigger point to non-compliance action. We sought further information from staff in Minute 3 in this regard. Having considered the submitter's request and the further information provided by staff, we accept the staff recommendation that is more appropriate that the submitter formally applies to the ORC for an exemption under s78 of the Act rather than amending the Plan in response to the submitter's request for a variation. The Panel notes that ORC staff will respond separately to Maniototo Pest Management on their exemption request.
P332.8	Kāi Tahu ki Otago	Plan Rule 6.4.6.2 (Designated Good Neighbour Rule) - Explanation of rule should be amended to allow for representative bodies to also initiate complaints. 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	Amend text to read: 'Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier <u>and affected representative bodies</u> ' This plan rule should also be expanded to support any district wide farming initiative that targets integrated rabbit control measures over multiple adjoining farms.	Feral rabbits	Reject	The proposed rule provides a mechanism to reflect the costs that a lack of action from one land occupier can have on an adjacent land occupier to manage the spread of rabbits across boundaries. No amendments are required to support district wide farming initiatives, as ORC can support such initiatives without the need to regulate for this in the Plan.
P335.39	Barrie Wills	In relation to [Table 23] Section 5.3 is so full of loopholes that sustainable control of rabbits could well be totally unsustainable. This is an economically significant regional (and national) pest you are attempting to manage, rules need to reflect that.	No specific relief requested.	Feral rabbits	Note	no specific relief requested.
P339.3	The Aramoana League Inc.	Section 6.4.6 - Support the inclusion of rabbits. Aramoana Township surrounded by DOC land township plagued by rabbits.	Supports the inclusion of rabbits.	Feral Rabbits	Note	The submitters supports the inclusion or feral rabbits in the Plan.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S003.1	Robert Britton	RABBITS.....In 1962 I worked for a period on the Kingston Pest Destruction Board, as a break from 12 years in the motor industry and just before I got married. There were 3 of us on the board, based in Garston, Northern Southland, The foreman was Hec Wilson ( former All Black ). Our area was from Kingston Station at the north end, to Nokomai Valley in the south, and Eyre Creek in the west, to the Nevis Valley in the east. We worked 3 days and 2 nights each week. During the days we carried out a variety of jobs - we would walk the farms and hills with about 20 dogs of various breeds with our Browning 5 shot repeater shotguns, or lay and check traps, or do poisoning - oats soaked in 1080 or jam laced with 1080 and placed at every heap of rabbit droppings. The jam ( raspberry ) was carried up the mountains in 10 litre buckets, and a spoonful laid at each sign. Occasionally we would do a carrot drop using a Fletcher topdresser aircraft and a front end loader. Another task was gassing burrows - small glass vials of liquid cyanide were used. We reached into the burrows, held our breath and broke off the little tit on the end of the vial, poured the cyanide into the burrow, then pushed a rock into the entrance, covered up with earth using a grubber. This was very effective where there were multiple entrances to a burrow system. Two nights each week we did night shooting. Starting at 11 pm, one of us would drive the Landrover truck and operate the roof spotlight, while the other two men stood on the deck leaning over the cab roof. They shared the shooting, one going to the left and one to the right. We finished around 4 am, sometimes with up to 80 rabbits and 20 hares lying in the rear deck tray. These were skinned and gutted and the meat taken to the trees where our dog kennels were located, and hung on the branches to dry, well above the dogs. This was the dog tucker each night. We had the rabbits fairly well under control. The numbers shot at night would tend to dispute this, but these were shot over a 5 hour period, across quite a big territory. Perhaps the modern method of controlling rabbits needs a more varied approach, rather than relying on poisoning. This doesn't seem to be working. There could even be a good case for employing young men similar to the old pest destruction boards.	Perhaps the modern method of controlling rabbits needs a more varied approach, rather than relying on poisoning. There could even be a good case for employing young men similar to the old pest destruction boards.	Feral rabbits	Note	ORC's website contains information on different rabbit management methods. The establishment of a pest destruction board is outside the scope of the Plan. We note that Central Government disbanded PDBs in 1989 and are not likely to reinstate when Biosecurity Act legislation provides for pest management options.
S012.3	Federated Farmers of New Zealand	7.We are also disappointed in the hands-off approach to rabbit control. The current model for controlling rabbits is not working.	ORC can do more – such as encouraging neighbours to do their control together so re-population is minimised.	Feral Rabbits	Note	A key project identified in the Strategy is to 'Develop a programme to facilitate the establishment of landowner-led rabbit control groups. This shall be modelled on best practice examples within Otago and other regions'. We sought further information from staff in Minute 6 and the Panel is satisfied that there are a number of additional tools available to provide additional support to landowners. We recommend that Council acknowledges and notes the available tools that sit outside the Plan process that could be useful in providing additional support to land occupiers for rabbit control.
P078.1	Max Harvey	I would really like to see ORC support and contribute to the funding of the Dunedin Wildlife Hospital. Quite frankly, you talk about hoiho, rapoka, toroa etc being rare and crucial to tourism in Dunedin, not to mention kea, kaka, tui, korimako among other species found elsewhere, but do not mention at ALL how many of these animals are positively affected by rehab and treatment at the hospital. This hospital is literally boosting the 'economy' and BIODIVERSITY which is more important. Hoiho are now projected to become extinct on the mainland in the next 10-20 years. Look to Moeraki/Penguin Rescue to see the impact of rehab and treatment, they have the largest population of hoiho on the mainland at >20% of the birds! The DWH is essential, and to not fund it as a regional council, the hospital of which serves the entire region, is a travesty.	Provide funding and support for the Dunedin Wildlife Hospital.	Funding	Reject	This submission is not related to the Plan and is therefore out of scope.
P122.4	Dawn Sangster	I think there needs to be some sense around economic benefit and cost. We are worried about the cost of the proposed work and “unintended consequences.” Predator free 2050 is this a realistic goal or are we just creating more issues.	Consider costs of proposed pest plan.	Funding	Note	The anticipated annual cost of implementing the Plan is estimated to be \$1,897,000 subject to the long term plan and annual plan processes. This is a doubling of the current expenditure. We find the implementation costs to be acceptable. On that basis, we recommend that the ORC considers increasing the funds allocated for Plan implementation purposes through the annual planning process 2020/21 and subsequent years for the life of the Plan. The Panel are satisfied that there is likely to be adequate funding for the implementation of the plan in accordance with section 74(d) of the Biosecurity Act 1993.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P182.7	Federated Farmers of New Zealand	FFNZ recommends that pest management be at least partially funded through a Uniform Annual General Charge. 18. Pest management and the protection of biodiversity are a 'public good' and have significant benefits for the wider community. For this reason, FFNZ contends that pest management should be at least partially funded using a Uniform Annual General Charge as opposed to targeted rates based on land value. 19. Farmers contribute to pest management twice through private pest control undertaken on their own land and by paying rates for council pest control activities. Farmers are also significant contributors to biodiversity in that many have areas of native bush on their property 'retired' from farming use. 20. The general public benefits from pest and weed control because it contributes to greater native biodiversity, and the protection of significant indigenous vegetation and habitats as required by the Resource Management Act. This natural heritage is important to the identity of New Zealanders and is globally unique in the high level of endemic species. No one community of people in the area benefits more than the other from biodiversity.	Requests that that pest management be at least partially funded through a Uniform Annual General Charge.	Funding	Accept	The funding section of the Plan in Table 33 outlines the proposed funding formulae for inspection and monitoring, education and advocacy and control. The Biosecurity Act 1993 requires that funding is sought from people who have an interest in the Plan, those who benefit from the Plan and those who contribute to the pest problem. The funding formula in Table 33 and associated analysis in Section 9.5 of the Plan gives effect to these requirements. The proposed funding formula reflects where the control of the pest is primarily for production purposes, most of these costs should be borne by rural land occupiers. The Panel recommend that the ORC considers increasing the funds allocated for Plan implementation purposes through the annual planning process 2020/21 and subsequent years for the life of the Plan. The Panel are satisfied that there is likely to be adequate funding for the implementation of the plan in accordance with section 74(d) of the Biosecurity Act 1993.
P250.2	Haehaeata Natural Heritage Trust	The Trust would encourage the Council to ensure that funding is maintained for both the initial control costs and also subsequent maintenance control programmes	Ensure funding is maintained for adequate control programmes	Funding	Note	See response to P122.4
P294.18	Save The Otago Peninsula	Action 3.4.1 Provide regional leadership and support for the site-led programmes in the Plan to protect indigenous biodiversity. The Plan includes a lot of encouraging words about supporting, assisting and facilitating community groups, but the Plan lacks detail and is not clear about what this will mean in practice. Having said that, STOP is pleased to note some options that are listed i.e. that ORC may assist groups to undertake control work, undertake monitoring of key species, lead some of these activities and undertake control works where there are barriers to landowners' participation. But will ORC be able to provide this practical assistance that is urgently needed? STOP's concern is that without increased ORC resources for staff working in the field, that the practical knowledge and help with the physical work of weed control in hard to access sites won't be available to community groups. In addition, weed control on steep road banks requires traffic management, the logistics and costs of which are beyond STOP's budget.	Council increase staff resourcing for Strategy implementation.	Funding	Note	The anticipated annual cost of implementing the Plan is estimated to be \$1,897,000 subject to the long term plan and annual plan processes, this includes an estimated budget for supporting the site-led areas. This is a doubling of the current expenditure. Additionally, one of the key strategy actions is that ORC will develop a plan of action for how the Council will support the delivery of the Dunedin site-led outcomes and ORC will work with key parties when this is developed. See also response to P122.4
S012.5	Federated Farmers of New Zealand	a. Are all actions funded? Given some actions will be completed over a five-year timeframe, we expect that not all actions will have budgets allocated to them. However, it would be useful to indicate which actions will be funded from baselines, which already have committed funding, and which will need funding from future budgets.	indicate which actions will be funded from baselines, which already have committed funding, and which will need funding from future budgets.	Funding	Note	All implementation is intended to be funded, and the funding of both the Plan and Strategy will be subject to the long term plan and annual plan processes. See also response to P122.4
S012.6	Federated Farmers of New Zealand	c. The Department of Conservation often negotiates significant pest and weed control programmes for access to conservation land for significant projects (e.g. Bathurst's \$22 million pest and weed control programme for their Escarpment mine in the Buller district). There may be an opportunity for ORC to facilitate similar agreements for new major projects in the region.	Requests ORC consider opportunities to facilitate funding agreements for new major projects in the region.	Funding	Reject	Offsetting and compensation are options that may be available to land occupiers through the Resource Management Act 1991 resource consent process where this is appropriate. However, this is outside the scope of the Plan. ORC does not have a role in the facilitation of the types of agreements set out in this submission, but the Panel notes that staff can offer technical support to these programmes as needed.
P258.2	Forest and Bird	While we believe the proposed Strategy is mostly very good as far as it goes, we note that implementation will require more resourcing and commitment than has occurred in the past. We urge Council to increase the operational budget for ORC's biosecurity functions in next year's Annual Plan to ensure there are adequate resources available for effective monitoring of pest populations and trends, and for rigorous enforcement.	The operating budget for biosecurity functions is increased through the 2019/20 Annual Plan process.	Funding	Note	See response to P122.4

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P258.26	Forest and Bird	Funding for pest control Section 9. Summary of Analysis of benefits and costs: It is reasonable and fair that those who benefit commercially from pest control should pay for it. Pest control for the purpose of protecting commercial operations (agriculture, horticulture) should be paid for directly by the appropriate commercial sector. Rabbits are a conservation pest, but these effects are insignificant in comparison to the impact of the species on agriculture. In addition, the spread of the species has generally been the result of pastoralism. Rabbit control should therefore be funded by the pastoral industry specifically. For other species the benefits will be more evenly spread and a decision on who will pay should be made on a species by species, if not project by project, basis. Pest control for conservation purposes benefits everyone, and funding for this work should come from the general funds of both central and regional government. However there are many instances where farming practices have caused the spread of species that are pests for the purposes of conservation, such as deer, goats and some weeds. The commercial farming sector should contribute substantially to the control of these pests, in addition to government funding. Control of many pests will have both conservation and commercial benefits (possums for example). Funding sources should be proportional to the relative benefits to conservation or commerce. Implementing the type of responsive pest control funding system outlined above may require changes in the rating and administrative systems of the Council. Industry sectors will probably need to be rated on an individual basis, so that separate pest control funds can be established, to make the connection between benefits / responsibility and funding transparent. The short term costs of such changes should not deter the Council from establishing a fair and accountable funding system.	Council should review funding policies associated with the implementation of the plan to ensure the costs are fairly allocated between the public and commercial sectors.	Funding	Accept	Section 9.5 of the Plan and Table 33 set out a new proposed funding formula for the allocation of costs for Plan implementation. See also response to P122.4
P263.13	Queenstown Lakes District Council	QLDC requests that the ORC consider increasing resourcing for environmental monitoring and compliance regarding wilding conifers across the Otago region. We fully support the Plan's intent but we are concerned about interpretation, and do not want to see the rules discouraging landowners to enter into pest management programmes.	ORC increase resourcing for environmental monitoring and compliance regarding wilding conifers.	Funding	Note	See response to P122.4
P263.20	Queenstown Lakes District Council	We also propose that the ORC provides financial support to remove the willow waste left in the Kawarau River from historical ORC operations. The willow continues to prohibit complete control of Lagarosiphon in the Kawarau River.	ORC provides financial support to remove the willow waste left in the Kawarau River from historical ORC operations.	Funding	Reject	This is outside the scope of the Plan review. However, it is noted that in the 2018/19 year ORC undertook removal of willow waste in the Kawarau River. The Panel notes that ORC staff will discuss what future works may be required with QLDC and LINZ outside the Plan review process.
P266.18	Lindis Pass Conservation Group Inc	Appendix One. Organisms of Interest. Briar, Rubus fruticosus: An invasive rose which has spread massively through dry grazing land and on steep slopes around rivers, it spreads readily and if we didn't remove it at seedling stage, it would by now cover the Scenic Reserve.	ORC to actively support Landcare in the pursuit of bio-control techniques.	Funding	Note	ORC contributes to the biocontrol collective which researches and tests biocontrol agents for use in NZ. The Panel is not aware of any effective biocontrol agent for briar known at this time.
P066.1	Ben Pearse	[in relation to broom]: Native Pidgeon likes these so kill off the pigeon. [in relation to wilding conifers]: because prove why! Are they trees? Proof what damage they do! [in relation to feral rabbits]: us rabbit board system only! It employs people! [in relation to new additions]: Dreamt up so you don't see other things! If you found a mouse you would kill it! All an excuse to keep you employed to achieve nothing! [in relation to good neighbour rules]: Dictators again! [in relation to gorse and broom]: Apply to city council's roads etc. [in relation to cost allocation]: To mislead the public. [what does it mean if I live in a built up area?]: City Councils does nothing around the city! [protect what we treasure]: says dictators! [what does responsive and flexible mean]: Wrong people in the job! [regulatory context diagramme]: Bad city councillors! Hide behind the Act! [general comments]: Can't even look after town belt and tracks all overgrown, tell the wind to stop blowing from Australia RE biosecurity, I give you the public 14 days to finish your 10yr plan - but really we have already made it up!	No specific relief requested.	General	Note	No specific relief requested.
P070.1	MA & AF Henderson	We were going to fill this out - but realised that dealing with the 'ORC' it would be a waste of time!! You would not be remotely interested as you will do what you (ORC) want to do and still charge massive yearly rates! We can't even work out why you are even there?	No specific relief requested.	General	Reject	This submission is out of scope and does not relate to the Plan.
P072.1	Joe Fersum	The biggest pests in this area are the ORC top brass. They are as useless as tits on a bull. The sooner they get out of it and amalgamate with the DCC the better.	No specific relief requested.	General	Reject	This submission is out of scope and does not relate to the Plan.
P114.1	Don Andrew	My submission is that the ORC be disbanded and closed up as it was useless at pest management in the past and I see no reason to believe it will be any different with the future proposed pest management plan.	To actively encourage the abolition of the ORC and perhaps have a unitary authority.	General	Reject	This submission is out of scope and does not relate to the Plan.
P115.1	Ann Walker	I am pleased to see that the Peninsula Biodiversity Group has started trapping possums in the Waverley area this year. They are concentrating on pest animals and native planting further down the Peninsula. I hoped that there would be some effort at weed control in the Waverley area, similar to the work undertaken at Ravensbourne along the cycleway. When we moved into the area 15 years ago there was a walking track sign at Torr St for a 'path' that came out at Larnach Rd/Marne St (where the election hoardings go up). I believe this is privately owned land, not Council land as I had assumed. There are sycamores, banana passionfruit, bomera, barberry as well as a vine that is covering desirable trees like Totara.	No specific relief requested.	General	Note	No specific relief requested but provides useful information in relation to the proposed site-led programmes.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P140.1	Just Doi	I do not think that labelling an organism as a "pest" is a useful way to describe their intricate relationship with the environment and other participants.	No specific relief requested.	General	Reject	The term 'pest' is a defined term in the Biosecurity Act 1991 meaning 'an organism specified as a pest in a pest management plan'.
P166.1	Terence Hurford	Conclusion: This group of birds' needs an abundant food supply. Because they have no option but to continue as they do for their existence. Our fish community has no option but to live where it does. will argue the point but it has no option either. I hope ECAN will see the light before there is an ecological disaster. When man is forced to change direction he changes a few things around and comes out on top again. Look at Christchurch Central. When this was flattened, people moved away to opportunities in the outer city. How many now miss the Central City? For myself I am pleased the churches did not all go for who would be there to ring a peel for godwits when they return in the spring? People will assist if asked to deal with other pests to our birds which are stoat, weasel, ferrets, cat, hedgehog, rat and opossum. Many are doing this already and thank you.	No specific relief requested.	General	Note	No specific relief requested on the Plan.
P184.3	Lynne Stewart	Key terrestrial Otago ecosystems include a variety of tussock grassland, wetland, and inland saline habitats on remnants of the Otago Peneplain, which support a large number of threatened plant, lizard, fish, and invertebrate populations; areas of indigenous forest, mainly in the east, south, and west of Otago Region, which provide habitat for threatened indigenous forest fauna; montane tall tussock grasslands, which are being cleared at an alarming rate; and naturally rare limestone, saline, and outwash plain ecosystems. Pressures on these ecosystems and species include mammalian predation, and invasion by exotic weeds. We are also losing our unique Otago biodiversity with clearance of habitat: land-use changes and subdivisions.	No specific relief requested.	General	Note	No specific relief requested.
P198.3	Gerry Essenberg	Urban land should have an overriding plan put together by the District Council as should large property owners. Note there is a responsibility and price that goes with owning land.	Good Neighbour Rules shall apply to all urban property for all pests.	General	Reject	The Panel notes that the Plan sits within the jurisdiction of the the ORC, not the district council. Unless otherwise specified, the control of pests in the Plan is a land occupier responsibility. The only land occupiers that are not required to meet these rules are Crown land. Good Neighbour Rules are therefore proposed for some pests to require management of those pests on Crown land so they do not spread to adjoining properties.
P199.4	Kim Clifton	10. Who stands to gain/profit from rolling out said plan into other areas and who are the stakeholders?	No specific relief requested.	General	Note.	No specific relief requested on the Plan. The beneficiaries and exacerbators of the Plan are described in Section 9.8 of the Proposal and Table 32 of the Plan. The extent to which a person benefits from the Plan is dependant on the pest being controlled and where that control takes place. Stakeholders are those who have an interest or are affected by the Plan.
P270.2	Otago Fish and game	Fish and Game is a member of the Lake Dunstan Aquatic Weed Management Group and has contributed to this group's submission. The changes identified in that submission are supported by Fish and Game.	Support for submission from the Lake Dunstan Aquatic Weed Management Group.	General	Note	Submissions from the Lake Dunstan Aquatic Weed Management Group are addressed at submission points 331.1 to 331.4.
P321.4	Papatowai Barberry Busters	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.	The plan should be more aspirational and ambitious and more leadership is needed.	General	Note	The Strategy sets out ORC's aspirations for improved biosecurity management in Otago and sets out a number of actions that will provide leadership to non-regulatory approaches.
P332.13	Kāi Tahu ki Otago	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. 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 to recognise the Crowns responsibilities under the Treaty of Waitangi and for definitive representation in the decision making frameworks.	Enable a mandated representative to represent Kā Rūnaka on the relevant Otago Regional Council governance board.	General	Note	The requirement for ongoing engagement is recognised in Section 2.4 of the Plan.
P332.14	Kāi Tahu ki Otago	Ensure that mana whenua dialect is reflected in policy documents pertaining to their ancestral takiwā.	Prior to finalisation the document should be given to Aukaha to review the use of Kāi Tahu dialect and appropriate translations.	General	Note	The Panel notes this as a useful suggestion and recommends this be undertaken.
P332.6	Kāi Tahu ki Otago	Section 2.4 - Relationship with Maori - 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. 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. 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 to recognise the Crowns responsibilities under the Treaty of Waitangi and for definitive representation in the decision making frameworks.	Enable a mandated representative to represent Kā Rūnaka on the relevant Otago Regional Council governance board.	General	Note	Amendments have been made to the Strategy to enable this in response to the submitter's other submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P333.2	Environment Southland Regional Council	ES would like to see more information on the costs and benefits of managing Moth Plant and False Tamarisk.	Provide cost-benefit analysis of the management of Moth Plant and False Tamarisk.	General	Reject	As outlined at Section 24 of the Cost Benefit Analysis accompanying the Plan, moth plant and false tamarisk are listed as pests for exclusion. As these pests are not currently present in the region only a Level 1 analysis has been undertaken. This is considered appropriate for an exclusion pest.
P333.5	Environment Southland Regional Council	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.	Supports the monitoring measures and has an interest aerial spraying of gorse and broom.	General	Accept	Environment Southland supports the monitoring measures identified in the Plan. The Panel notes that ORC operational staff will discuss the aerial monitoring of gorse and broom with Environment Southland staff outside of the Plan review process.
P334.2	Victoria Bonham	I am appalled by the mentality behind predator free 2050 . Where there is an abundance there is a potential resource , but you cannot expect to eradicate complete species without damaging the whole eco system and animals you seek to protect . You have no right to demonise animals by calling them pests , enciting hatred and animal cruelty. We must dismiss predator free 2050 as a cruel and insane agenda We must be transparent and open minded with our information and not resort to mis information and propoganda to fulfill an agenda.	Dismiss the agenda of Predator free 2050. Do not demonise animals by calling them pests.	General	Reject	The term 'pest' is a defined term in the Biosecurity Act 1991 meaning 'an organism specified as a pest in a pest management plan'.
P335.16	Barrie Wills	In relation to [Section 6.2.1] [infestation levels are low enough to make eradication possible within the proposed 10-year duration of the Plan] Good luck with that in relation to Wallabies (and pigs, and goats, and probably deer, chamois, tahr. There is a major source of infestation sitting just over the Waitaki River and a hunter/killer mentality that helps spread it regardless of ORC pest strategy implications.	No specific relief requested	General	Note	no specific relief requested.
P335.22	Barrie Wills	In relation to [Table 13] see appended photo of Eragrostis plants.	No specific relief requested	General	Note	no specific relief requested.
P335.4	Barrie Wills	In relation to [Page 17 - KiwiRail and ORC will work by agreement] KiwiRail has some of the worst infestations of gorse and broom, often adjacent to and very visible from state highways, in the country. Artemisia in the Waitaki Valley also originated from the rail corridor, and many disused railways (Rail Trail etc) still have a significant weed pest legacy to deal with. Is very similar to road reserve infestations historically originating from old County Council gravel pits - where does responsibility now lie and who pick up the cost???	Where does responsibility now lie and who pick up the cost???	General	Note	Section 3.3.4 of the Plan states: 'For the purposes of the Act, KiwiRail is treated separately to the Crown, and comes within the definition of an occupier of land under the Act'.
P335.45	Barrie Wills	In relation to [Section 7 - Sustained Control Programmes][Nodding thistle - No spread to adjoining properties] Given the means of seed dispersal (dominantly wind) in the Asteraceae family, that indicator is virtually irrelevant.	Amend the indicator for nodding thistle and ragwort to a more practical indicator.	General	Note	No specific relief was provided regarding an appropriate alternative indicator.
P335.46	Barrie Wills	In relation to [Section 7.2][c. Report on the operational plan each year] To who??	Clarify who the yearly report on the operational plan is to.	General	Note	The yearly report on the operational plan is undertaken by ORC to measure effectiveness. The report is prepared by Council for public accountability and is available on the website and in hard copy upon request.
P335.47	Barrie Wills	In relation to [Section 7.2][d. Maintain up-to-date databases of complaints] Will they be made available to the public??	Specify whether the complaints database will be publicly available	General	Note	The complaints database is an internal ORC database.
P335.48	Barrie Wills	In relation to [Section 8.3][The public will be able to inspect this register free of charge during business hours] Will it be online??	Specify whether the public register of exemptions will be online.	General	Note	It is not intended to publish this online. The Panel notes that this is a living document that ORC staff will update as required as exemptions are granted.
P338.1	Kawarau Station Limited	We are in favour of any help we can get from people such as Regional Council and Local District Councils, our only concern is that when Councils become involved our rates increase. For example I have enclosed some costings of what we spend yearly to control pests on this property.	We are in favour of any help we can get from people such as Regional Council and Local District Councils, our only concern is that when Councils become involved our rates increase.	General	Note	The submitter being in favour of support being provided by ORC and district council, but recognising that this increases rates, is noted. The Panel notes that the submitter's information regarding control on their property provides useful information to assist ORC staff in understanding the species being controlled by land occupiers.
P338.10	Kawarau Station Limited	There are still a number of pests to keep us on our guard - such as Hieracium, Cotton Thistles, Horehound, Hemlock and Thyme.	No specific relief requested.	General	Note	No specific relief is requested. The submitter's information regarding hieracium, cotton thistles, horehound, hemlock and thyme in this area is noted.
P338.4	Kawarau Station Limited	Pigs - We never had a problem until the 2000 era. Only a small number at first, now a real problem. We believe that the pigs have been released by unknown people although some may have been forced over the Kawarau River from the west.	No specific relief requested.	General	Note	No specific relief is requested. The Panel notes that the submitter's information regarding pigs on their property provides useful information to assist ORC staff in understanding emerging pest management issues in this area.
P338.9	Kawarau Station Limited	Nodding Thistle - very few compared to other varieties. Introduced by carrots for the Rabbit control many years ago.	No specific relief requested.	General	Note	No specific relief is requested. The submitter's information regarding nodding thistle in this area is noted.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S013.6	Kāi Tahu ki Otago	Chapter 3.1.4 - Investing in research and development (p.18) - Current terminology creates uncertainty, particularly in regards to the characteristics of 'cost effectiveness' and who defines these parameters.	Clarification is sought on how 'cost effectiveness' is defined	General	Note	"Cost effective" in the context of 'Prioritise this research to target harmful organisms that have the greatest threat to the Otago region, and where possible, work collaboratively with other organisations so that research is cost effective to ORC and can be of value to more people' refers to where the funding of research can be shared between organisations, so that each organisation benefits from the research results and cost sharing arrangement.
S013.8	Kāi Tahu ki Otago	Chapter 3.3.3 - Support and work in partnership with Kāi Tahu (p.21) - We would like to see our treaty partnership recognised, perhaps by Kāi Tahu Rūnaka ki Otago representation on the relevant governance board.	Clarification sought on how 'engage with Kāi Tahu' will be implemented on a practical level.	General	Note	How ORC can work in partnership with Kāi Tahu will be dependant on the nature and scale of the project. The Panel recommends ORC staff work proactively with Kāi Tahu to define what this looks like.
S014	Lala Frazer	I wish to endorse the submission made by Save The Otago Peninsula (STOP) inc Soc.	Supports the submission by Save the Otago Peninsula.	General	Note	Support for the submission made by Save The Otago Peninsula is noted.
S016.3	Catherine Brigham	The bush near me in West Harbour seems covered in creepers. Banana passionfruit? Bomeria?	No specific relief requested.	General	Note	No specific relief requested but provides useful information in relation to the proposed site-led programmes.
P018.1	Maggie McCormick	Invalid submission . No information provided.		General	Invalid Submission	Invalid Submission
P079.1	Abigail Gill	Invalid submission . No information provided.		General	Invalid submission	Invalid submission
P086.1	Ashleigh Wilson	Invalid submission . No information provided.		General	Invalid submission	Invalid submission
P286.1	New Zealand Transport Agency	This submission provides input from the Transport Agency reflecting its role as the operator of New Zealand's national state highway network. State highways are linear, travelling through numerous different human and natural environments. In most cases the road reserve that has the potential to harbour pest plants, are reasonably narrow and vulnerable to/influenced by neighbouring properties, and linear transport networks have significantly more neighbours than most land occupiers. The Transport Agency will support Otago Regional Council by undertaking pest plant control. However, the Transport Agency notes as a landowner that to ensure beneficial outcomes, commitment from other adjoining landowners is necessary. The Transport Agency also recognises that road corridors can facilitate the distribution of pet plants and we seek to work proactively and collaboratively with Otago Regional Council in managing the distribution of pest plants.	No specific relief requested	General	Note	ORC notes NZTA's role in undertaking pest control on transport corridors and the proactive collaborative approach NZTA will take with ORC to manage pests.
P328.1	Josie Harris	Section 2.5 - 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 any 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. = Inadequate public consultation and input.	No specific relief requested	General	note	The submitter's views on consultation are noted. A summary of the consultation undertaken is provided in the Hearing Report and a more detailed summary of consultation is appended to that report.
S002.2	Richard Hewitt	In the same period: 3 feral cats [one 40 inches long from nose to tip of tail and heavy]. I get cats all year round and the cats tend to go up trees and are despatched by gun. 3 ferrets were despatched. Unfortunately the dog is too small to hold these animals and a number have escaped. The ferrets come through this area in a wave in February each year and I missed the opportunity to trap and destroy. Rats have been at what I would call plague numbers this year. I have had to resort to using bucket/s of poison and laying baits in bait stations around the property. I appear to have had some success as the taking of baits has slowed. Stoats have not been seen as often as in previous years.	No specific relief requested.	General	Note	The submitter's comments on the presence of pest species on their property is noted.
P015.1	Joshua Gould	I do NOT want this to be a thing in New Zealand.	No specific relief requested.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P040.1	JoAnne Campbell	I dont agree about peoples pets getting killed.	Opposes the killing of pets.	General Opposition	Reject	There are no provisions in the Plan that require or promote the killing of pets.
P089.1	Jenea Te Whare	I am opposed to the ORC plan for pest management. There are many other constructive and more cost effective ways. Animals have rights and it's not fair to punish them based on human negligence.	Opposes the Plan.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P135.1	Noeline Bourke	I do not 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.	Opposes the list of animals declared as pests.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P147.1	Tina Kapohe	I do not support list of pests in Table 2.	Opposes the Plan.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P147.1	Tina Kapohe	I do not support the pests to be managed under sustained control programmes.	No specific relief sought.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P150.1	Julia Stewart	I DO NOT support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. I suggest council DROPS the list of animal pests as listed in the plan.	Opposes list of pest animals in Plan.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P151.1	Martin Broadbent	I do NOT support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. I suggest council DOES NOT accept the list of animal pests as listed in the plan.	Opposes list of pest animals in Plan.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P189.1	Diana Stiven	I do not 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 except cats and hedgehogs	Oppose list of pests in the Plan.	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P288.1	Mainland Environmental Trust	Mainland Environmental Trust opposes the The Pest Management Strategy plan on the basis that persisting with the same methodology that historically has not worked will continue to not only be ineffective but is destructive and problematic in itself - that only through regular monitoring and observation will one there be an understanding and appreciation of our unique areas and eco systems , reasonable management should only be expected where there is an identifiable and persistent problem - Animal cruelty is not acceptable under any circumstances. We do not support the demonizing of animals by calling them pests and do not support youth programmes encouraging the hatred of animals and animal cruelty . We do not support any agenda to wipe out an entire species of animal . Nor do we support the total eradication of plants and trees.	Opposes the plan.	General Opposition	Reject	ORC agreed that animal cruelty is unacceptable. The term 'pest' is a defined term in the Biosecurity Act 1991 meaning 'an organism specified as a pest in a pest management plan'. The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
S016.4	Catherine Brigham	I'd like to see more done to tackle pest plants before you carry out a big "kill all mammals" plan.	Oppose killing mammals.	General Opposition	Reject	The animal species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
S008.1	Joshua Gould	I do NOT want this in New Zealand.	Opposes Strategy	General Opposition	Reject	The species listed as pests in the Plan cause economic, cultural, social, recreational and/or environmental effects.
P007.1	Peter Simpson	I support the proposal.	No specific relief requested.	General Support	Accept	The submitter supports the Plan.
P008.1	Simon Sebbings	I agree broadly with the proposed pest control programme, but I propose that 2 other very significant plant pests be placed on the list- one for containment and one for eradication.	Support subject to additions.	General Support	Accept	The submitter supports the Plan.
P097.1	Kelvin Milne	I support the plan more info is needed so everyone knows what the plants look like ( picture leaflet ).	Support plan but encourage further information around pests.	General Support	Accept	The submitter supports the Plan. When the Plan has been made operative, information and pictures of the pests will be available on ORC's website.
P098.1	Blair Jeffrey Devlin	I am supportive of the ORC seeking to do more through the Regional Pest Management Plan. Everywhere you look in the Queenstown Lakes district the landscape is being invaded by pest plants. I am supportive of all the new plants and animal pests included in the draft plan, particularly the addition of wilding conifer species.	Supports the Plan.	General Support	Accept	The submitter supports the Plan and the addition of wilding conifer species.
P126.1	Logan Cowdell	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P128.1	Rebecca Bell	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P130.1	Rafferty Parker	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P133.1	Monika Divers-Sidor	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P136.1	Marty Roberts	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P137.1	Dell McLeod	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P138.1	Jennifer Thomas	I support the list of animals declared as pests including mustelids, possums and rats. I suggest council accepts the list of animal pests as listed in the plan.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P139.1	Davina Hopgood	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.	Support the list of organisms declared as pests in Table 2. [it is noted that this is likely submitted in error - see submission points 139.5-8].	General Support	Accept	The submitter supports the list of organisms declared as pests.
P141.1	Josh Norton	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P142.1	Craig Freeman	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P144.1	Jared Oliver	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P146.1	Karin Johnsson	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P148.1	Rusty Knight	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P149.1	Matthew Peppercorn	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P152.1	Rosalie Goldsworthy	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P153.1	Fiona Peoples	I support the list of animals declared as pests including hedgehogs, mustelids, possums and rats.	Support the list of organisms declared as pests in Table 2, with the exception of feral cats.	General Support	Accept in part	The submitter supports most organisms declared as pests.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P155.4	Jo Standley	I support the inclusion of mustelids and rats as these species have significant impact on our native biodiversity and need to be controlled, especially in areas with significant native ecosystems.	Support inclusion of mustelids and rats through site-led programmes.	General Support	Accept	The submitter supports the inclusion of mustelids and rats in the Plan.
P157.1	Dylan Robertson	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P159.1	Elm Wildlife Tours	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P160.1	Fiona Peat	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P161.1	Bonnie Wilkins	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P174.1	Helen Clarke	For Proposal 4.1 I support all the pest plant species listed in the document.	Support pest plants listed in the Plan.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P174.3	Helen Clarke	I support all the animal pest species in the list. I am very pleased to see not only the large browsers but the main predators included. Mustelids, feral cats and hedgehogs are big predators of ground dwelling natives. Ground nesting birds, skinks and geckos and insects are all vulnerable to their free range.	Support pest animals listed in the Plan.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P182.1	Federated Farmers of New Zealand	In general, we are in support of the RPMP and have the following specific comments.	Support the Plan with amendments.	General Support	Accept	The submitter supports the Plan.
P182.6	Federated Farmers of New Zealand	FFNZ supports Crown land occupiers being bound to the RPMP. 16.FFNZ considers there is an ongoing problem with pest control on Crown, DoC and Council land. Proactive pest control is seldom undertaken and only done once an obvious problem develops, when it is more difficult to control the pest within the boundaries. This causes problems for landowners who bear the costs of poor pest control on adjoining land when it spreads to their own property. Otago Regional Council must ensure pests on Crown, DoC and Council land are adequately controlled.  17.FFNZ views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and not required to directly contribute to regional pest management. While we acknowledge that DoC does undertake significant pest management in the region, we consider the good neighbour rule as applied in the Plan will provide a level of clarity and certainty that will ensure the objectives and policies are more likely to be achieved.	Supports good neighbour rules.	General support	Accept	The submitter supports the Good Neighbour Rules.
P183.1	Routeburn Dart Wildlife Trust	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.	Supports animals listed as pest animals in the Plan.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P185.1	Nicola Richards	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P201.10	Dunedin City Council	The DCC supports the pest management framework, and encourages the advocacy and education measures outlined at 5.3 (pages 24-25).	Support pest management framework.	General Support	Accept	The submitter's support of the framework and encouragement of advocacy and education measures is noted.
P212.2	Te Kakano Aotearoa Trust	We support all the animal pest species in the list. Our focus is to increase native biodiversity and all the pest animals listed have a significant impact on our indigenous species. It is very good to not only see the large and small browsers listed but the main mammalian predators as well. Less predators mean more birds for pollination and seed dispersal significantly impacting natural regeneration within our sites and seed availability for our nursery. Mustelids, feral cats, hedgehogs and rats are big predators of native birds. Ground nesting birds, skinks, geckos and insects are all vulnerable to their free range. Rabbits, hares, and possums all browse on our plantings. Rabbit protection has a significant financial impact on our work.	Support list of pest animals managed through the Plan.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P212.3	Te Kakano Aotearoa Trust	For section 5.4 Good Neighbour rules. We support these rules as they apply to specific pests. Our planting sites are often on public land and can have many neighbours. Invasive plants cross borders easily. We support that "Landowners and/or occupiers" is stated throughout the document. Often "occupiers" do not consider they have the same responsibilities as "owners" for pest control work.	Support Good Neighbour Rules and reference to 'landowners and/or occupiers' throughout the Plan.	General support	Accept	The submitter supports the Good Neighbour Rules and reference to 'landowners and/or occupiers' throughout the Plan.
P217.1	Predator Free NZ Trust	Firstly the Predator Free New Zealand Trust would like to commend the Otago Regional Council on a comprehensive and well thought out Proposed Regional Pest Management Plan. The list of predators named in the plan is extensive. We recognise that Otago has an important role to play in the Predator Free New Zealand vision and we commend you on your support for Predator Free Dunedin. This is a progressive move by council and one that we believe the region will benefit from immensely. Not only will Predator Free Dunedin improve biodiversity the impact on connecting communities around a common goal should not be overlooked. Community engagement is a vital part of achieving a predator free New Zealand and encouraging and supporting community involvement is vital. It also important for council to realise the need for them to lead by example on their own land. In terms of the plan we are very supportive of the plan in general.	No specific relief sought.	General Support	Accept	The submitter supports the Plan.
P217.3	Predator Free NZ Trust	We support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. We suggest council accepts the list of animal pests as listed in the plan.	Adopt Table 2 as proposed.	General Support	Accept	The submitter supports the list of organisms declared as pests.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P218.1	Open Valley Urban Ecosanctuary - Open VUE	Open VUE supports the Otago Regional Council's proposed Pest Plan. The tracking project undertaken by the school students shows that feral cats, hedgehogs, mustelids, possums, rats and mice are all present in North East Valley.	No specific relief sought.	General Support	Accept	The submitter supports the Plan.
P218.2	Open Valley Urban Ecosanctuary - Open VUE	Open VUE supports the inclusion of all of the pests identified in section 4.1 of the proposed pest plan. The addition of feral cats, feral deer, feral goats, feral pigs, hedgehogs, mustelids (ferret, stoat, weasel), possums and rats (Norway, ship and Kiore) to the list of classified pests provides Open VUE with a much clearer platform to engage with the community to create a low-pest environment and support healthy populations of indigenous species in the Lindsay Creek Catchment. Likewise, the pest plants listed as high priority for the West Harbour site-led programme support the aims of Open VUE and provide a framework to restore the ecological integrity of the Lindsay Creek Catchment.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P220.1	Lenz Reserve Committee, Tautuka (Forest and bird Society)	The Lenz Reserve committee supports the plan in its objectives and agrees with the eradication, containment and control requirements.	Supports the plan.	General Support	Accept	The submitter supports the Plan.
P221.1	Papatowai Forest Heritage Trust	The Papatowai Forest Heritage Trust also aims "To Protect What We Value" * and therefore supports the objectives of the Otago Regional Council's Proposed 10 year Pest Management Plan and Biodiversity Strategy. *The heading used for the summary guide to the proposed 10 year Pest Management Plan and Biodiversity Strategy	Supports the plan.	General Support	Accept	The submitter supports the Plan objectives.
P222.1	Environment Canterbury	Environment Canterbury supports the Otago Proposal for a Regional Pest Management Plan. We support the consistency of provisions between the Otago Proposal and the Environment Canterbury Regional Pest Management Plan to manage wilding conifers. We note the boundary concerns with Bennett's wallaby and support the eradication objective for this pest. We have a work programme underway to progressively reduce wallabies within the Containment Area in South Canterbury and prevent any movement beyond this area.	Support for the Plan, including support for the consistency with the Canterbury Regional Pest Management Plan and support for inclusion of Bennett's wallaby for eradication.	General Support	Accept	The submitter supports the Plan and the consistency it achieves between the two councils, and the wallaby eradication programme.
P223.1	Grant Lester	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P224.1	Alan Roberts	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P225.1	Grant Crawford	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P231.1	Keith Marshall	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P237.1	Mary Pearson	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P242.1	Holly Walters	The Trust supports the inclusion of wilding pine, gorse and rabbits as pests in the Plan, and supports the Good Neighbour Rules that relate to these species: Rule 6.3.4.3 (wilding pine), Rule 6.4.3.4 (gorse and broom) and Rule 6.4.6.2 (feral rabbits).	Support for inclusion of wilding pine, gorse and rabbits as pests, and support for Good Neighbour Rules associated with these.	General Support	Accept	The submitter supports inclusion of wilding pine, gorse and rabbits as pests in the Plan, and supports the Good Neighbour Rules that relate to these species.
P243.1	Te Nohoaka o Tukiauau/Sinclair Wetlands Trust	The Trust supports the inclusion of these species as pests in the Plan, and supports the Good Neighbour Rules that relate to these species listed below: Rule 6.3.4.3 (wilding pine), Rule 6.4.3.4 (gorse and broom), Rule 6.4.6.2 (feral rabbits).	Support the inclusion of wilding conifers, gorse and broom and feral rabbits and the associated good neighbour rules.	General Support	Accept	The submitter supports inclusion of wilding pine, gorse and rabbits as pests in the Plan, and supports the Good Neighbour Rules that relate to these species.
P243.3	Te Nohoaka o Tukiauau/Sinclair Wetlands Trust	Proposed Biosecurity Strategy (the Strategy). The Trust supports several of the implementation measures described in Section 4. Implementation. Specifically, the Trust supports: The establishment and facilitation of a biosecurity technical working group to meet twice a year to share ideas and innovations, identify synergies and collaborate on projects, The development of a Possum Control programme, Development and implementation of a volunteer facilitation programme to support community volunteer groups in undertaking biodiversity projects and biosecurity control.	Support for the Proposed Biosecurity Strategy.	General Support	Accept	The submitter supports the Strategy.
P250.1	Haehaeata Natural Heritage Trust	The Haehaeata Natural Heritage Trust wishes to acknowledge and compliment the Otago Regional Council for its Proposed Regional Pest Management Strategy (RPMS). The Trust is extremely supportive of the inclusion in this version of the RPMS of the 11 species of wilding conifers, sycamore and wilding russell lupins. By doing so, the Otago Regional Council has finally come into the 21st century and is now better aligned with the neighbouring Canterbury and Southland Regional Councils. The Trust considers that the pest control strategies outlined in the Proposed RPMS relating to these individual species is appropriate for their respective pest situations.	Support the plan and the list of pest species it includes and the management methods used.	General Support	Accept	The submitter supports the inclusion of wilding conifers, sycamore and wilding Russell lupins in the Plan.
P250.3	Haehaeata Natural Heritage Trust	The Haehaeata Natural Heritage Trust Supports the Otago Regional Council Proposed Biosecurity Strategy as written.	Supports the strategy.	General support	Accept	The submitter supports the Strategy.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P258.1	Forest and Bird	Forest and Bird is largely in support of the directions taken in both the proposed Regional Pest Management Plan (PRPMP) and Biosecurity Strategy. Forest and Bird welcomes the additions of new good neighbour and the new gorse and broom rules as well as the addition of new exclusion pests and the site-led programs with inclusion of wild Russell lupins and more wilding conifers. Overall, we are impressed with the level of detail and thought that has gone into it. Things have indeed changed in the last decade in regard to the ORC approach to pest management. Finally, the significance of the threats posed by many of the species listed has been recognised. As well as recognising the urgent need to take action to reduce and preferably eliminate the threats these pests pose to our indigenous biodiversity and valued landscapes.	Supports the Plan and Biosecurity Strategy.	General Support	Accept	The submitter supports the Plan.
P258.11	Sue Maturin	Section 6.4.3. Forest and Bird supports all these species being listed for progressive containment and the associated rules.	Support for species listed for progressive containment, and related rules.	General Support	Accept	The submitter supports the progressive containment programme in the Plan.
P259.1	Lala Frazer	I have presented submissions to at least two of the previous ORC Pest Management Strategies and have experienced the frustration of not only seeing only pests that impacted on agriculture being included. but also the flow on effects of that on requested actions/assistance sought from local bodies and government departments who argued their inability to act based on the fact that the pest animal or plant was not included in the ORC's Pest Management Strategy. I therefore wish to endorse wholeheartedly all the pest plants and animals that have an impact on native biodiversity that it is now finally proposed to include.	Support the plan	General Support	Accept	The submitter supports the list of organisms declared as pests.
P263.1	Queenstown Lakes District Council	The Queenstown Lakes District Council (QLDC) strongly supports the Otago Regional Council's monitoring and enforcement role to achieve positive results for the whole region. We are very pleased that Otago Regional Council (ORC) will provide regional leadership and support of landscape scale and site-led projects, and we look forward to working closely with you to help achieve our district's pest management goals.	No specific relief sought.	General Support	Accept	The submitter supports the ORC's monitoring and enforcement role in the Plan and regional leadership and support of landscape scale and site-led projects.
P266.1	Lindis Pass Conservation Group Inc	Sections 1.1, Proposal, 1.2 Purpose of the Plan. Lindis Pass Conservation Group (LPCG) agrees with the principles expressed in this section, that specific pest plants and pest animals should be systematically controlled or eliminated by the actions of the Otago Regional Council exercising its a regional leadership role under the Biosecurity Act 1993. We approve this intent.	In terms of the Biosecurity Act 1993, ORC to provide regional leadership in activities that prevent, reduce, or eliminate adverse effects from harmful species that are present in their region.	General Support	Accept	The submitter supports the purpose of Plan and ORC's leadership role under the Biosecurity Act 1993.
P266.2	Lindis Pass Conservation Group Inc	2.1.1. Regional Policy Statement and Regional Plans. LPCG supports the bullet points in this section that give a commitment to control the adverse effects of pests, to safeguard indigenous species and their habitats, and to prioritise pest management in areas of significant indigenous biological diversity and habitats of significant fauna.	ORC to carry out a programme of pest control that truly protects indigenous habitats.	General Support	Note	The submitter's support for section 2.1.1 is noted. The intention of the Plan and Strategy is to protect environmental, social, economic and cultural values from the impacts of pests and harmful organisms.
P267.1	Arrowtown Village Association	We support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. We suggest council accepts the list of animal pests as listed in the plan.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P268.1	Fiona Rowley	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P270.1	Otago Fish and game	Fish and Game takes a holistic, ecosystem based approach to environmental management. It considers that a healthy and diverse ecosystem is critical to ensuring resilience and productivity. While anglers and hunters only hunt specific game birds and sports fish, they derive benefit from recreation in healthy landscapes and are strong advocates for effective environmental management. In line with this, the conservation and environmental management activities undertaken by Fish and Game benefit many species across a wide variety of ecosystems. Pest management and biosecurity is a key part of this endeavour. Fish and Game is supportive of the Proposed Pest Management Plan and Proposed Biosecurity Strategy as a whole.	Fish and Game is supportive of the Proposed Pest Management Plan and Proposed Biosecurity Strategy as a whole.	General Support	Accept	The submitter supports the Plan.
P270.4	Otago Fish and game	Apart from the changes referenced above, Fish and Game is supportive of the species declared as pests and organisms of interest.	Support for the species declared as pests and organisms of interest.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P281.1	Thomas Stuart Brownlie	We wholly support the regional Pest Management Plan and the wider Biosecurity Plan. This is a great step for biosecurity across Otago. Section 3.1 The Management Agency: We support the proposed management agency although would like to see an additional preference for local technical service providers if and where required during the lifespan of the plan.	Extend responsibilities of the management agency to local technical service providers if and where required.	General Support	Note	Support for the Plan is noted. It is not clear what is meant by 'local technical service providers' in the context of Section 3.1. The Panel assumes the submitter is seeking local contractors to be accredited by ORC to undertake service delivery in sub areas of the Region. The Panel did not hear from the submitter at the hearing and so notes the submission point.
P282.1	Duncan Keenan	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P283.1	Wakatipu Reforestation Trust	We support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats. We suggest council accepts the list of animal pests as listed in the plan.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P286.10	New Zealand Transport Agency	Section 6.4 Pests to be managed under sustained control programmes.	Support the implementation of property boundary proximities in rural areas (Good Neighbour Rules). Support the timeframes for sustained control.	General Support	Accept	The submitter supports the sustained control Good Neighbour Rules.
P286.4	New Zealand Transport Agency	The Transport Agency and its contractors are responsible for the control of pests on roads and road reserves as well as any Crown land under their management. KiwiRail is treated differently to the Crown as it is regarded as an occupier in relation to pest management, not as the Crown. KiwiRail is to work with ORC to manage expectations and obligations. They will develop agreements to manage pests in the rail corridor.	Support the implementation of the Good Neighbour Rule. Support KiwiRail being bound by the Good Neighbour Rules as pest plants in the rail corridor frequently impact the NZ Transport Agency's ability to remain pest plant free in the road corridor.	General Support	Accept	NZTA's support for the Good Neighbour Rules is noted. KiwiRail, as it is not a Crown entity, is bound by the rules in the Plan that require land occupier control.
P289.1	Director General of Conservation	I support the Otago Regional Council's (ORC) proposed 10-year Regional Pest Management Plan (RPMP) and Biosecurity Strategy 2018 and its investment in protecting what we treasure from the impact of harmful organisms. I commend the ORC on developing the proposed RPMP and Strategy, and significantly increasing funding for pest and weed control in Otago.	Supports the plan.	General Support	Accept	The submitter supports the Plan and Strategy.
P293.16	Otago Peninsula Biodiversity Group	We are looking forward to the ORC taking a lead role in supporting community groups with their pest control and eradication efforts especially in areas where these do not have the power to act. In summary, we strongly support the proposed RPMP and Biosecurity Strategy in general, and encourage the ORC to adopt the proposed amendments to provide adequate certainty that the plan's objectives are achieved in full and on time.	Strongly support the plan.	General Support	Accept	The submitter supports the Plan and Strategy and OPBG's encouragement that ORC take a lead role in supporting community groups is noted.
P294.14	Save The Otago Peninsula	Support Actions 3.2.1, 3.2.2, 3.2.3	Actions are retained.	General support	Accept	The submitter supports the Strategy actions 3.2.1-3.2.3.
P294.2	Save The Otago Peninsula	Plan Objective 6.3.2 Pests to be managed under progressive containment programmes by occupiers.	Support. Retain.	General Support	Accept	The submitter supports the progressive containment programme in the Plan.
P294.20	Save The Otago Peninsula	Appendix 2 STOP supports the provision for the inclusion of additional site-led programmes or amending an existing site-led programme.	Appendix 2 is retained.	General support	Accept	The submitter supports Appendix 2 of the Strategy.
P294.3	Save The Otago Peninsula	Plan Rule 6.3.2.1 All occupiers within the Otago region shall eliminate Bomarea infestations on the land that they occupy.	Support. Retain.	General Support	Accept	The submitter supports the bomarea programme in the Plan.
P295.1	Landscape Connections Trust Halo Project	LCT applaud the ORC's commitment to reviewing the existing Pest Management Strategy for Otago 2009 and we support the more robust requirements for review required under the National Policy Direction for Pest Management 2015. LCT also recognise the complex regulatory framework surrounding pest management in New Zealand and we commend ORC staff and their contractors for their efforts in bringing this all together to create the PRPMP and Proposed Biosecurity Strategy. We are in strong support of the overall purpose of the PRPMP and Proposed Biosecurity Strategy, however, we note that appropriate objectives need to be adopted and that effective implementation will be required to ensure that these objectives are achieved.	General	General Support	Accept	The submitter supports the Plan and Strategy and the need for appropriate implementation is noted.
P295.12	Landscape Connections Trust Halo Project	LCT support the inclusion of Bomarea (B.caldasil, B.multiflora) in "Section 6.3 Pests to be managed under progressive containment programmes" along with occupier responsibility rules.	Support for inclusion of Bomarea for progressive containment.	General Support	Accept	The submitter supports the bomarea programme in the Plan.
P296.1	Morgan Foundation	Firstly the Morgan Foundation would like to commend the Otago Regional Council on a comprehensive and well thought out Proposed Pest Management Plan. The list of predators named in the plan is extensive. In terms of the plan we are very supportive of the plan in general.	Supports the plan	General Support	Accept	The submitter supports the Plan.
P297.1	Forest & Bird - Tautuku Restoration Project	I support the list of animals declared as pests including feral cats, hedgehogs, mustelids, possums and rats, feral deer and feral pigs. It is essential that the council accepts the complete new proposed list of animal pests as listed in the plan in order to protect New Zealand's native biodiversity.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the Plan.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P298.1	Predator Free Dunedin	PFD has an exciting vision to make Dunedin the South Island's first predator free city and to reinforce its status as the wildlife capital of New Zealand. This vision requires all Dunedinites to be involved and to embrace the goals of Predator Free into their daily lives to collectively enhance Dunedin's environment. ... An operative RPMP that is robust and strongly supportive of PFD's ambitions, and contracted objectives, is critical to PFD's success. We cannot rely on community goodwill and voluntary action alone. A strong and enforceable RPMP will support our communities, and PFD member organisations who are committing to its success. This submission has been canvassed amongst PFD members and amended according to feedback. However, some organisations have not had time to fully evaluate this document within their organisation and so whilst it has received general endorsement, it should not be taken as an official position of all PFD member entities. PFD applaud the ORC's commitment to reviewing the existing Pest Management Strategy for Otago 2009 and we support the more robust requirements for review required under the National Policy Direction for Pest Management 2015. PFD also recognise the complex regulatory framework surrounding pest management in New Zealand and we commend ORC staff and their contractors for their efforts in bringing this all together to create the PRPMP and Proposed Biosecurity Strategy. We are in strong support of the overall purpose of the PRPMP and Proposed Biosecurity Strategy, however, we note that appropriate objectives and rules need to be adopted and that effective implementation will be required to ensure that the objectives are achieved.	We are in strong support of the overall purpose of the PRPMP and Proposed Biosecurity Strategy, however, we note that appropriate objectives and rules need to be adopted and that effective implementation will be required to ensure that the objectives are achieved.	General Support	Accept	The submitter supports the Plan and Strategy.
P298.16	Predator Free Dunedin	PFD support the inclusion of Bomarea (B.caldasil, B.multiflora) in "Section 6.3 Pests to be managed under progressive containment programmes" along with occupier responsibility rules.	Support for inclusion of Bomarea for progressive containment.	General Support	Accept	The submitter supports inclusion of bomarea in the Plan.
P300.1	Ruth-Ann Anderson	I wish to submit in favour of the Otago Regional Council's proposed Pest Management Plan and the list of pest organisms it contains. There will be opposition to the control of wilding conifers, Russell Lupins and feral/pest cats, but the ORC has laid our good reasoning for their control and they needed to be included in the Plan. I would like to wish the ORC every success with this comprehensive policy. All ratepayers and their putative grandchildren will benefit.	Supports the plan	General Support	Accept	The submitter supports the Plan.
P308.1	Kevin Voges	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the Plan.
P309.1	Alison Brown	This submission refers particularly to the addition of new pests in ORC's Proposed 10 year Regional Pest Management Plan and Proposed Biosecurity Strategy.	Supports the plan	General Support	Accept	The submitter supports the Plan and Strategy.
P310.2	Yellow-eyed Penguin Trust	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	Supports the list of pest plants	General Support	Accept	The submitter supports the Plan.
P310.6	Yellow-eyed Penguin Trust	We note and support the list of pest animals, especially feral cats, feral pigs, hedgehogs, mustelids, possums and rats.	Supports the list of pest animals	General Support	Accept	The submitter supports the Plan.
P312.13	Land Information New Zealand	Section 6.4 Pests to be managed under sustained control programmes: LINZ supports the management of broom, gorse, nodding thistle, ragwort and wild Russell lupin under sustained control programmes, and the associated Good Neighbour Rules.	Manage broom, gorse, nodding thistle, ragwort and wild Russell lupin under sustained control programmes, and the associated Good Neighbour Rules.	General Support	Accept	The submitter supports the inclusion of pests to be managed by sustained control programmes in the Plan.
P312.17	Land Information New Zealand	Section 6.4.4 Sustained control programmes for nodding thistle and ragwort: 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.	General Support	Accept	The submitter supports Objective 6.4.4 and Rules 6.4.4.1 and 6.4.4.2.
P312.6	Land Information New Zealand	Section 6.2 Pests to be managed under eradication programmes: LINZ supports the reduction of all infestations of Bennett's wallaby, rooks and spiny broom to zero levels within the Otago region.	Retain Plan Objective 6.2.3 and Plan Rules 6.2.3.1 – 6.2.3.4.	General Support	Accept	The submitter supports Objective 6.2.3 and Rules 6.2.3.1 – 6.2.3.4.
P312.7	Land Information New Zealand	Section 6.3.2 Pests to be managed under progressive containment programmes by occupiers: 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.	Retain Plan Objective 6.3.2 and Plan Rule 6.3.2.6.	General Support	Accept	The submitter supports Objective 6.3.2 and Rule 6.3.2.6.
P313.1	Carrie Pritchard	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of species declared as pests.
P315.1	Andrew Davis	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of species declared as pests.
P316.1	Yolanda van Heezik	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.	Supports the list of species declared as pests.	General Support	Accept	The submitter supports the list of species declared as pests.
P318.1	Ben Teele	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of species declared as pests.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P324.1	Aspiring Biodiversity Trust	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of species declared as pests.
P332.9	Kāi Tahu ki Otago	Section 7.0 - Monitoring - Most of the things we do are dynamic processes and responses to living documents for management and governance will change intergenerationally. 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.	Support annual review of the management agencies performance as per s.7.2 as well as systematic monitoring of the plans effectiveness.	General Support	Accept	The submitter supports the monitoring obligations in the Plan.
P333.1	Environment Southland Regional Council	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.	Supports the plan.	General Support	Accept	The submitter supports the Plan and Strategy.
P337.1	Marion Mertens	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.	Support the list of organisms declared as pests in Table 2.	General Support	Accept	The submitter supports the list of organisms declared as pests.
P339.1	The Aramoana League Inc.	Section 5.4 - GNR - Support, very important to include local authorities & crown e.g. DOC.	Supports good neighbour rules.	General Support	Accept	The submitter supports the inclusion of good neighbour rules in the Plan.
P343.1	Quarantine Island Kamau Taurua Community Incorporated	Quarantine Island Kamau Community Incorporated (QIKT Inc) commends the Regional Council on the development of this RPMP and appreciates the opportunity to provide feedback on the plan as it does influence our voluntary pest control activities.	Supports the Plan.	General Support	Accept	The submitter supports the Plan.
P343.11	Quarantine Island Kamau Taurua Community Incorporated	Quarantine Island Kamau Taurua Community Inc. supports the submissions presented by the Otago Peninsula Biodiversity Group, Landscape Connections Trust, Save the Otago Peninsula and Forest and Bird.	Supports the submission of the Otago Peninsula Biodiversity Group, Landscape Connections Trust, Save the Otago Peninsula and Forest and Bird.	General Support	Note	The submitters support for the submissions by the Otago Peninsula Biodiversity Group, Landscape Connections Trust, Save the Otago Peninsula and Forest and Bird is noted.
S001.1	Peter Simpson	I agree with the proposal.	Support the strategy.	General Support	Accept	The submitter supports the Strategy.
S012.1	Federated Farmers of New Zealand	In general, we support the draft Strategy. We welcome the proactive approach taken, and we would like to participate in future workshops and other biosecurity initiatives. However, we have concerns about how possums and rabbits are managed.	Supports the Strategy subject to amendments to how possums and rabbits are managed.	General Support	Accept	The submitter supports the Strategy.
S016.2	Catherine Brigham	I support wilding pine removal and rock snot removal research.	No specific relief sought.	General Support	Note	The submitter's support of the removal of wilding conifers and rock snot research is noted.
S012.4	Federated Farmers of New Zealand	a. We generally support the priority actions. We are particularly pleased to see that actions have identified partners and support agencies.	Supports the Strategy actions.	General Support	Accept	The submitter supports the Strategy.
P004.1	Neil John Hardy	Extension of gorse and broom free areas. Just a message of support for this proposal and to say that I will continue to ensure that my land is free of these weeds.	Support extension of gorse and broom free areas.	Gorse and Broom	Accept	The submitter supports the extension of the Gorse and Broom Free Areas.
P010.1	Mark Davis	We support the extension of the 'Gorse and Broom Free Area' as shown in Appendix 3 of the draft plan. We believe this will improve the environment and ecosystem of the upper Clutha area. While this will have a small impact (and our property is directly effected by this charge) we are 100% in support of it.	Support the extension of Gorse and Broom Free Areas.	Gorse and Broom	Accept	The submitter supports the extension of the Gorse and Broom Free Areas.
P010.2	Mark Davis	We would go further and believe the Gorse and Broom Free Area should cover the entire Cardrona Valley and all surrounding area of Wanaka.	Extend Gorse and Broom Free Areas further to cover the entire Cardrona Valley and all surrounding area of Wanaka.	Gorse and Broom	Reject in part	See the response to submission P212.4 and P252.1.
P106.1	Olly Laytham	Good neighbour rules. Greater spraying of Gorse and Broom, particularly in urban pockets. More regular controls, more closely overseen.	More spraying of Gorse and Broom.	Gorse and Broom	Note	The Strategy actions proposed an 'urban gorse and broom free programme throughout Otago' be established in the next five years. This is yet to be developed but would provide assistance and guidance to land occupiers in urban areas. The control of gorse and broom is a land occupier responsibility.
P124.1	Donna & Brett Hamilton	We are in support of the changes which includes part of our property. However we do want to make it clear that we have a pylon chain running through our property and this makes it difficult to manage the gorse and broom that is under these structures and wires. Normally we use a helicopter to manage weeds in areas like this. We are also wanting to make the council aware that the broom and gorse is very poorly managed on the roadsides that run through our property and has always been a significant source of where our weeds come from. If the proposed changes are adopted we would need to see improvement of the roadside management by the council.	General support for the proposed Plan but seek awareness of difficulties around broom and gorse management.	Gorse and Broom	Note	Support for the new gorse and broom free areas is noted and the Panel recognise the difficulties in managing gorse and broom under pylon lines and where it is being spread by road corridors. Territorial Authorities have the same occupier responsibilities as private land owners and will also be required to eliminate gorse and broom within the gorse and broom free areas, and alongside road boundaries in accordance with Rule 6.4.3.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P212.4	Te Kakano Aotearoa Trust	For section 6.4.3. Sustained control programme for broom and gorse. We support the extension of areas within the gorse and broom free areas but note that Wanaka and Hāwea urban areas are not included nor are the lowlands bordering the Upper Clutha and Hāwea river. Also a narrow strip up the Cardrona river. These areas are and will continue to be a source of re-infestation within in the area. We consider they should be included to work towards eradication in the Upper Clutha Basin.	Request that Gorse and Broom free areas are expanded to incorporate the Wanaka and Hāwea urban areas, the lowlands bordering the Upper Clutha and Hāwea river, and the narrow strip up the Cardrona river.	Gorse and Broom	Reject	The Panel considers that the further extension of the gorse and broom free areas referred to in this submission is not feasible at this time, but that the further areas sought could be considered as an additional extension in the next Plan review when the current 'new gorse and broom free areas' have been cleared. Any extension would require ORC to consider the likelihood of success in these areas, undertake a flyover and/or site visits, and consult with the affected land occupiers. As the gorse and broom free areas primarily relate to rural land (and particularly high country and tussock grasslands), the Strategy actions propose an 'urban gorse and broom free programme throughout Otago' be established in the next five years. This is yet to be developed but would provide assistance and guidance to land occupiers in urban areas.
P227.1	Shona Elizabeth Bennet	I haven't read the proposed pest management plan yet but want to get s point across about the pest weed (gorse) that our government (nz Rail ) is ignoring and is getting out of control.	No specific relief sought.	Gorse and Broom	Note	No relief is requested, however it is noted that the proposed gorse and broom rules apply to KiwiRail land.
P232.1	Gill Harbrow	Under the new Regional Pest Management Plan it is proposed to expand the Gorse and Broom Free area on our property at 289 Kidds Road which would include the area which we are particularly concerned about. (We have enclosed a copy of the area concerned from the area mapped in Appendix 3 of the plan.). This area due to its topography has to be sprayed by helicopter which makes it very expensive to control. We do not support this proposal because in paragraph 3 (of the letter sent from ORC on 1 November 2018) is states that "The current plan includes a rule that requires land occupiers to destroy all gorse and broom on their land if it falls within a Gorse and Broom Free Area, which is mapped in Appendix 3 of the plan." It is the word "destroy" that concerns us. With the existing seed bed it would make it extremely difficult and expensive to eradicate. This area of gorse, as we understand, has been present for decades. As advised we would actually prefer for our property not to be included with this proposed expansion at all but if we could compromise and exclude this area of our property which already has gorse present. On Wednesday 5th November we asked Richard Lord, ORC Team Leader for Biosecurity to visit our property to listen to our concerns. While on the property photos were documented of the gorsed area we are most concerned about.	That all, or a defined part of the submitter's property be excluded from the Gorse and Broom Free area.	Gorse and Broom	Accept in part	We heard from Gill Harbrow about the concerns around achieving compliance with the gorse and broom free rules on her property. In response, we directed in Minute 6 that staff provide a recommendation on whether an alteration to the gorse and broom free boundary on the property of the submitter is appropriate. Staff provided an amendment to the gorse and broom free boundary on the submitter's property and we are satisfied that the amendment is an appropriate adjustment in this instance based on the landowner's demonstrated efforts and commitment to removing gorse and broom from their property, the unique physical characteristics of the property making some clearance difficult, and that overall, the amended boundary would not impact on the overall intended plan outcomes in this regard. For clarity, the amended boundary is noted on p9 of the staff report entitled 'Staff Response to Questions from the Hearings Panel - Minute 6' dated 19 August 2019.
P249.1	Matarae Station	6.4.3: Control Programmes for Broom and Gorse. Support that Broom and Gorse needs to be eradicated/controlled. But current proposal requires amendment as it is not just a landowner issue. Problem of broom and gorse hasn't been caused by landowners. Suggest some contribution by all ratepayers as roading, birds, water and vehicle movements by the wider public have all contributed to its spread. ORC needs to ensure biological control methods are also pursued. As a landowner who annually spends towards \$10,000 to try to control this spreadit is frustrating to see continual spread of seeds on the property. Active enforcement needs to be carried out by the ORC. Until the broom and gorse issue is controlled it will continue to be difficult to achieve reduced ferral rabbit populations in our area.	Suggest some contribution by all ratepayers as roading, birds, water and vehicle movements by the wider public have all contributed to its spread. ORC needs to ensure biological control methods are also pursued.	Gorse and Broom	Note	The funding formulae set out in Section 9.5 of the Plan and Table 33, proposed the funding of inspection, monitoring and control is borne by rural landowners and occupiers via a targeted rural rate, and education and advocacy is borne by the regional community. ORC contributes to the Bio Control Collective which researches and tests biocontrol agents for use in NZ. The Panel notes that the use of broom gall mite as a biocontrol agent is proving to be effective in reducing the control of broom in Otago, and is a result of the work undertaken by the Bio Control Collective and ORC staff.
P252.1	Cardrona Residents and Ratepayers Society Inc	Because of the 10 year review review cycle of the imminent plan, we feel that it is essential that the Gorse and Broom Free Area for the Upper/Central Cardrona area be extended North from its proposed boundary to the Cardrona Ski Field Road as a new boundary. The areas of heaviest infestation of Gorse and Broom in the Cardrona Valley is within this proposed new boundary.	Extend the Gorse and Broom Free Area to the Cardrona Ski Field Road so effective control over pest plants that under existing laws/rules the current landowners are reluctant and not required to control, to the detriment of the community.	Gorse and broom	Accept	As the existing gorse and broom free areas cover most of the upper Cardrona Valley, and the proposed new gorse and broom free area extension within the Cardrona Valley will apply to the southern end of the valley, the Panel agreed there is merit in extending the new area further north to the Cardrona Ski Road through this Plan review (see map appended to submission). The Panel directed in Panel Minute 7 that Staff consult with affected property occupiers. We note we received no written views in response to Minute 7. The Panel is therefore accepts the submission and recommends this area be added as the Cardrona Ski Road would provide a logical boundary to work to.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P257.2	City Forests Limited	Rules 6.4.3.2, 6.4.3.4 A similar point is made regarding the containment of gorse and broom on boundaries. The word "eliminate" is not practical, and certainly not within the timeframe of this proposed plan. "contained within property boundaries" is an appropriate measure, and will ensure good neighbour obligations are met.	The wording for Rules 6.4.3.2, 6.4.3.4 is changed to "contained within property boundaries".	Gorse and Broom	Reject	The explanatory text under Rule 6.4.3.2 states that for the purpose of the rule, eliminate means the 'permanent preclusion of the plant's ability to set viable seed'. Further, the language used in the rule is consistent with that of neighbouring councils.
P260.3	Bronwyn Judge	I am also concerned about gorse as it is used by the Herbert Heritage Group, as a nursery plant for our native plantings. It provides protection and it seems preferable to removing gorse by spraying.	No specific relief sought.	Gorse and Broom	Note	As Herbert township is located outside the gorse and broom free areas, the only occupier gorse and broom rules that apply to private land is the 10m boundary rule in Rule 6.4.3.2 for rural zoned land upon complaint. As gorse and broom are declared pests in the Plan, Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. The Panel is aware that that gorse may be used as habitat for native seedling in some circumstances. However, this is not always appropriate and the Act specifically provides for an exemption process where ORC may exempt a person from the requirement of a rule where this meets the requirements of the Act as set out in Section 8.3 of the Plan.
P266.7	Lindis Pass Conservation Group Inc	6.4.2 Broom: Common Broom, Cytisus scoparius, Montpellier Broom, Teline monspessulana: Yellow Broom is a persistent and tenacious weed that needs to be eliminated in its entirety. There is some in the Scenic Reserve and although we have cut, poisoned and uprooted it, it continues to appear. If we weren't working on it, common broom would spread rapidly throughout the Scenic Reserve, smothering the native herbs that grow there and overwhelming the high value and scenic tussock landscape.	ORC to work on gradually eliminating yellow broom wherever it is found, so that it can no longer seed into Scenic Reserves and across other valuable conservation land.	Gorse and Broom	Note	The Lindis Pass Scenic Reserve is located within the gorse and broom free area where total control is a requirement. Although ORC cannot enforce Rule 6.4.3.1 on Crown land, the Panel strongly encourage the control of gorse and broom in this area and can work collaboratively with DOC, Environment Canterbury and The Lindis Pass Conservation Group to assist with addressing broom in this area.
P312.14	Land Information New Zealand	Section 6.4.3 Sustained control programme for broom and gorse: 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.	Gorse and Broom	Accept	The submitter supports the gorse and broom programme.
P312.15	Land Information New Zealand	Plan Rule 6.4.3.2: 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: 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 property is eliminating broom infestations within 10m of that boundary with the intention of protecting their economic well-being.	Gorse and Broom	Accept	The requested amendment simplifies the Rule.
P312.16	Land Information New Zealand	Plan Rule 6.4.3.4 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: 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 property is eliminating gorse infestations within 10m of that boundary with the intention of protecting their economic well-being.	Gorse and Broom	Accept	The requested amendment simplifies the Rule.
P335.27	Barrie Wills	In relation to [Table 18] Technically, the seed pods 'dehisce', rather than explode. Historic water races are particularly susceptible to floating seed transport over considerable distances. Also hydro lakes like Roxburgh and Dunstan which now have colonies of gorse and broom around their shorelines. Neither LINZ nor Contact Energy seem to want to know about pest weed control within their "occupier" jurisdictions.	No specific relief requested	Gorse and Broom	Note	no specific relief requested.
P335.28	Barrie Wills	In relation to [Table 18] [Provided taller tree species can become established within broom colonies, they will eventually displace broom] Broom reproduces & grows rapidly & seeds last decades, so spread usually outpaces tree establishment by a considerable margin.	No specific relief requested.	Gorse and Broom	Note	no specific relief requested.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P335.29	Barrie Wills	In relation to [Table 18] [indigenous vegetation particularly can overtop and suppress gorse] Consideration needs to be given to regional environmental variation, because in Central Otago the presence of tall indigenous vegetation (and/or tree spp) is far from the norm and rarely occurs. Even if it does, growth rates are usually too slow to effect any meaningful control measures.	Consideration needs to be given to regional environmental variation.	Gorse and Broom	Reject	The Panel does not consider explanation regarding regional environmental variation is required in the explanation in Table 18.
P335.31	Barrie Wills	In relation to [Plan Objective 6.4.3 - Alternatives Considered] The 'Alternatives' section is totally inadequate in my view. As I read it, voluntary action by individuals is not viable, ratepayers (and therefore ORC) cannot finance control work, and occupiers don't want to know about it, so what happens? Do we throw our toys in the bath? Are occupiers responsible or not, and how is ORC going to ensure control measures are carried out, especially in view of the Good Neighbour rule and revised G&B Free areas???	No specific relief requested.	Gorse and Broom	Reject	Occupier responsibilities are clearly set out in the gorse and broom rules. The purpose of this section is to explain why solely relying on volunteer action, or solely relying on ORC control would not be effective, and that rules are therefore required.
P335.32	Barrie Wills	In relation to [Plan Rule 6.4.3.1]	Delete 's' in 'Maps'	Gorse and Broom	Accept	This corrects a minor error.
P335.33	Barrie Wills	In relation to [Plan Rule 6.4.3.1] What are the parameters of this?? Map 2 in App 3 is very vague and it will be almost impossible for land occupiers and other regulatory bodies to accurately determine where the boundaries lie from it. Has a specific contour line been used?? If so, then refer to it.	What are the parameters of this?? as a specific contour line been used?? If so, then refer to it.	Gorse and Broom	Reject	The Appendix 3 Maps are available online, which allows the maps to zoom so land occupiers can see how they apply to them.
P335.34	Barrie Wills	In relation to [Plan Rule 6.4.3.1] The road reserve/adjacent paddock infestations need to be addressed on state highways and district roads.	Include state highways and district roads in Rule 6.4.3.1.	Gorse and Broom	Reject	This rule applies to all land occupiers, this includes the occupiers of state highways and roads. The Panel does not consider clarification in the Rule is necessary as land occupier responsibilities for road reserves are set out in Section 3.3.4 of the Plan.
P335.35	Barrie Wills	In relation to [Plan Rule 6.4.3.1] What is the justification for not having legal effect until March 2024?	Explain why Plan Rule 6.4.3.1 will not have legal effect until March 2024	Gorse and Broom	Note	The Panel notes that this allows land occupiers who currently have gorse and broom infestations five years to become compliant. We note that the Rule in the decision version of the Plan will not have legal effect until October 2024.
P335.36	Barrie Wills	In relation to [Plan Rule 6.4.3.2] Again I question the adequacy of this rule. 10m is totally inappropriate in my view, regardless of what the neighbour is doing. Give the rule some teeth and make the distance 100m and create a decent barrier to spread!!	Amend rule 6.4.3.2 & 6.4.3.4 to state 100m instead of 10m.	Gorse and broom	Reject	A 10m boundary control rule is consistent with neighbouring councils and other regional councils nationally.
P335.38	Barrie Wills	In relation to [Plan Rule 6.4.4.1] 100m is totally inadequate for plants from the Asteraceae family. Their seed disseminates many kilometres under the right conditions.	Increase barrier size under Plan Rule 6.4.4.1	Gorse and Broom	Reject	A 100m boundary control rule is consistent with neighbouring councils and other regional councils nationally.
P335.52	Barrie Wills	In relation to [Map 2] The new area in the Pigroot should include both sides of the road from the Swinburn through to Green Valley. Nothing shown in the Teviot area around Roxburgh Hill etc??	Increase the mapped extent of New Gorse and Broom Free Areas in Map 2 around Pigroot and Teviot	Gorse and Broom	Reject	See response to submission P212.4.
P336.3	Angus Robertson	Rule 6.4.3.1 - oppose: why are these Gorse and Broom Free Areas only in Central Otago and fringes of Waitaki/Dunedin? They should be applied more widely and include Dunedin City.	Broaden the extent of Gorse and Broom Free Areas	Gorse and Broom	Reject	See response to submission P212.4.
P338.3	Kawarau Station Limited	Briar, Gorse and Broom - On going yearly since 1963. First operation by fixed wing aircraft, 20 hectares only then TORDON used, now we use ANSWER by helicopter up to 120 hectares. Per year costing \$15,000 also some by hand \$5,000. Briar, Gorse and Broom became a problem after the introduction of 1080 poison which killed and lowered the rabbit population.	No specific relief requested.	Gorse and Broom	Note	No specific relief is requested. The Panel notes that the submitter's information regarding control on their property provides useful information to assist ORC staff in understanding the species being controlled by land occupiers.
S003.2	Robert Britton	BROOM.....I observe the spreading of broom every year and wonder if the approach is wrong. Spraying of the broom is carried out after the seed pods have burst. I believe that it is too late by then. Every flower on a broom bush turns into a seed pod. Each seedpod contains 20 to 26 seeds. When the pods dry out and burst the seeds drop onto the ground, where they can remain dormant for up to 14 years. Wouldn't it be better to cut the bushes off at ground level as soon as the flowers show in the spring ? I have been doing this on my property for the past 30 years, here in Lower Shotover, and I have it under control.	Cut broom bushes off at ground level as soon as the flowers show in the spring.	Gorse and Broom	Note	The Panel notes that this is an effective method for controlling small infestations of broom.
S016.1	Catherine Brigham	I am amazed at the amount of gorse and broom everywhere. Seems hardly tackled.	No specific relief sought.	Gorse and Broom	Note	No relief requested.
P335.44	Barrie Wills	In relation to [Section 7 - Sustained Control Programmes][Gorse and broom - Absence adjacent to boundary fences] Increase the containment distance	Amend the indicator for gorse and broom to have an increased containment distance	Gorse and broom	Reject	See response to submission P335.36.
P339.2	The Aramoana League Inc.	Section 6.4.2 - Amend to go further to remove all gorse.	Amend Section 6.4.2 to remove all gorse.	Gorse and Broom	Reject	The eradication, progressive containment and sustained control of gorse was assessed in the Cost Benefit Analysis and a sustained control programme has a higher risk adjusted net benefit than eradication. Sustained control is considered the most appropriate approach in the proposed Plan. The control of gorse and broom is a land occupier responsibility. All land occupiers within rural zoned land are required to comply with Rule 6.4.3.4 regarding control within 10m of property boundaries and all land occupiers within the Gorse and Broom Free Areas shall eliminate gorse and broom. Additionally, the Strategy actions propose an 'urban gorse and broom free programme throughout Otago' be established in the next five years. This is yet to be developed but would provide assistance and guidance to land occupiers in urban areas.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P009.2	Tina Owen	4.1 Hedgehogs Hedgehogs should not be included as a pest. Harrier hawks will kill far more small birds, lizards etc.	Hedgehogs should not be included as a pest.	Hedgehogs	Reject	See the response to submission P104.1.
P065.1	Alison Nevill	I agree hedgehogs might eat threatened insects but do not believe they can actually eat un-damaged birds eggs. They do more good than harm in most areas. Hedgehogs should only be considered pests if there is a real risk to threatened insects, not on the unproven assumption that they can open undamaged eggs.	Hedgehogs should only be considered pests if there is a real risk to threatened insect.	Hedgehogs	Reject	See the response to submission P104.1.
P073.1	Kathryn Guthrie	Hedgehogs have both good and bad impacts on the environment but are only a pest in very specific settings - eg nesting birds on braided rivers. Hedgehogs consume a significant amount of agricultural pests such as moths and grass grubs as well as suburban garden pests so are good for the environment - less insecticide needed. Only approximately 10% of hedgehogs living in the area of a braided river will go down onto a river bed and eat eggs. Usually females with young looking for extra protein. 90% of hedgehogs are innocent. Hedgehogs don't have canine teeth. They are insectivores with teeth designed to crush. Other prey is abnormal for them. Braided river birds can be protected while nesting by a cage system trialled in North Canterbury that excludes predators but lets small birds enter easily. Exclusion not extermination. Hedgehogs occupy a similar predator niche to native weka and would likely have similar (or less) impact.	Only include hedgehogs as a pest in specific settings.	Hedgehogs	Note	No rules are proposed in the site-led programmes requiring land occupiers to destroy hedgehogs, however where hedgehogs are predating on native species in the site-led areas, ORC can support the communities in these areas in their control.
P104.1	John Geary	Hedgehogs should be removed from the pest plan. Hedgehogs do not have an impact on the environment.	Remove Hedgehogs from the Plan.	Hedgehogs	Reject	The intention of including hedgehogs in the Plan is to support Predator Free Dunedin and the West Harbour - Mt. Cargill and Otago Peninsula communities in controlling hedgehogs where they impact on biodiversity values. The impacts of hedgehogs are described in Table 24 of the Plan. No rules are proposed in the site-led programmes requiring land occupiers to destroy hedgehogs, however where hedgehogs are predating on native species in the site-led areas, ORC can support the communities in these areas in their control. The Hearing Report provides a more fulsome assessment of submissions regarding hedgehogs.
P109.1	G Oudemans	Except for eating the occasional eggs of ground nesting birds, hedgehogs are useful animals to keep ground dwelling insects at bay. Far too many get killed on the road.	Hedgehogs should not be included as a pest animal.	Hedgehogs	Reject	See the response to submission P104.1.
P111.2	Emma Paul	I wish to oppose hedgehogs being included as I do not believe they have an impact on the environment. They are not harmful organisms that need to be controlled. I see the plan as 'a licence to kill' and I do not think it is the right way to empower individuals and communities. Instead it enforces the killing mentality that is spreading through local government departments and filtering out into the mainstream. I do not think these animals will be killed humanely, and who will be present to witness it is done so? It will be impossible to monitor. The public's perception of these animals will change and they will be killed mercilessly and I am in no doubt, by barbaric methods. The plan wants to fall in line with other council management plans around NZ. Why do we have to follow the leader, when the leader uses faulty science to promote the misleading goal of NZ becoming predator free by 2050. It is an unachievable goal. All animals have their part to play within the food chain. Genocide of a single species will ultimately affect other species survival. Hedgehogs mainly eat insects, there is little evidence to suggest they break and eat bird eggs or eat baby birds.	Remove hedgehogs from the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P117.1	David F Smith	Concerned why the hedgehogs have to be destroyed. They can't climb trees, they eat small insects and don't harm anything or anybody.	No specific relief requested.	Hedgehogs	Reject	See the response to submission P104.1.
P134 .2	Charlene Gell	I do not support the inclusion of hedgehogs, which are considered an endangered species in other parts of the world.	Remove hedgehogs from the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P138.8	Jennifer Thomas	I do not believe either cats nor hedgehogs should come under the category of pests. Hedgehogs are great in the garden in undertaking bug control.	Remove hedgehogs as a pest.	Hedgehogs	Reject	See the response to submission P104.1.
P140.4	Just Doi	Hedgehogs have a role to play in in a balanced ecosystem.	Oppose the inclusion of hedgehogs in the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P145.4	Debbie Munro	mustelids as site led pests but not hedgehogs.	Remove hedgehogs from list of site-led pests.	Hedgehogs	Reject	See the response to submission P104.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P156.1	Victoria Louise Donohue	Re: proposal to classify hedgehogs as pests. I oppose this proposal. Strongly. Pest classification should take into account robust empirical evidence, and rate-payer wishes. As to evidence: I am not convinced that ORC has presented a defensible case for hedgehogs being a pest. Any such decision should be science-based. This proposal is not solidly supported by evidence. As to ratepayer preferences: hedgehogs do a lot of good and I sincerely believe that if all ratepayers were aware of this proposal AND how to oppose it AND had the resources to oppose it; they would. The cost, upset and potential negative view of ORC pushing through this proposal is not adequately balanced with any demonstrable potential good. Please, please reconsider before you condemn another species to death.	Remove hedgehogs as a pest in the Plan.	Hedgehogs	Reject	See the response to submission P104.1. A summary of the Plan and Strategy, along with a submission form was provided with local newspapers during the submission period in November and December 2018 and two drop-in sessions on the Dunedin site-led programmes were held in Port Chalmers and Portobello. The Plan and Strategy were publicly notified for submissions and feedback in November and December 2018 to provide all ratepayers an opportunity to have their say.
P179.2	Melissa Mcgrannachan	I personally don't agree that feral cats and hedgehogs should be on the cull list. I also don't see why hedgehogs would be on the pest list. They control insects and slugs in the garden. They were introduced for this reason. They do more good than harm to the birds and skinks.	Remove hedgehogs from the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P238.2	Gillian Duguid	I'll also add I think it is totally unnecessary to include hedgehogs as Pests as well. I have several in my garden and they do not bother anyone. Life is to be lived no matter what form your life takes on this earth. Don't disturb ecosystems, they find their own balance. Thank you	Remove hedgehogs from plan	Hedgehogs	Reject	See the response to submission P104.1.
P266.14	Lindis Pass Conservation Group Inc	6.5.2. site-led programmes – Hedgehog, Erinaceous europaeus: Hedgehogs are dangerous and efficient predators of skinks, geckos skinks, spiders, beetles, worms, and the eggs of ground-nesting birds. They occur vigorously throughout the high country at all altitudes.	ORC to include Hedgehogs in a "Site-Led Pest Programme" for either Eradication or Sustained Containment in the Lindis catchment, targeting this pest in a long-term and consistent manner.	Hedgehogs	Reject	See submission P201.8 regarding the establishment of new site-led programmes in the Plan.
P272.2	Wendy Hodgson	Hedgehogs also do cleaning up on urban places and probably find existence on that diet alone pretty tough. Hence most you will see be roadkill. If people are silly enough to let their hens loose in their gardens thn it's their stupidity. This is the natural life of a hedgehog. Birds lay eggs in trees. They're not living in dense bush, their impact is not great.	Remove hedgehogs from the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P284.1	Peter Ripley	I oppose having hedgehogs included as a pest and have it targeted for widespread eradication, such as the entire Otago Peninsula. Hedgehogs are very widespread so embarking on widespread eradication program is going to be very expensive and difficult, and it will be difficult to show a good cost:benefit ratio – particularly as there is a high risk of re-establishment of hedgehogs. Rather, ongoing control of hedgehogs in sensitive areas such as around seabird nesting colonies, or eradication within sanctuaries surrounded by animal-proof fences, is a more realistic and worthwhile undertaking. Summary: hedgehogs to be controlled in sensitive areas only but no money wasted on widespread eradication efforts.	Control hedgehogs in sensitive areas rather than expensive eradication.	Hedgehogs	Reject	See the response to submission P104.1. The Plan does not propose to eradicate hedgehogs.
P306.1	Stephanie Ripley	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. I would like you to not include Hedghog as a pest in the 10 year plan.	Remove hedgehogs from the plan	Hedgehogs	Reject	See the response to submission P104.1.
P323.2	Sandra Jane Condon	We strongly oppose hedgehogs included as pests !!!! Hedgehogs are NOT pests !!!! 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 !!	Remove hedgehogs from the plan	Hedgehogs	Reject	See the response to submission P104.1.
P327.2	Alex Kerr	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.	Remove hedgehogs from the plan	Hedgehogs	Reject	See the response to submission P104.1.
P330.2	Donna Suzanne Tomkin	Hedgehogs are not a threat. I have a pet one	Remove hedgehogs from the plan	Hedgehogs	Reject	See the response to submission P104.1.
S002.3	Richard Hewitt	I have noted that the numerous hedgehogs I see should be added to the list of vermin.	Add hedgehogs to the Plan.	Hedgehogs	Note	Hedgehogs are included in the Dunedin site-led programmes in the Plan.
S016.7	Catherine Brigham	Go ahead and keep tackling possums, rodents, stoats, weasels, ferrets. Look after native bush but leave Hedgehogs alone!	Remove hedgehogs from the Plan.	Hedgehogs	Reject	See the response to submission P104.1.
P263.17	Queenstown Lakes District Council	Lagarosiphon: Section 6.5.7 Site-led programme for lagarosiphon management areas: We support the progressive containment of lagarosiphon in Lake Wanaka and the Kawarau River to reduce its extent over the next 10 years.	Support section 6.5.7 Site-led programme for lagarosiphon management areas.	Lagarosiphon	Accept	The submitter supports the inclusion of the lagarosiphon site-led programme.
P263.19	Queenstown Lakes District Council	We recommend that the ORC contributes financially to the Lagarosiphon programme in the Kawarau River and monitors Lake Wakatipu, as carried out by the Lake Wanaka Lagarosiphon Management Group. This contribution will align with other stakeholder contributions and commitments.	ORC contributes financially to the Lagarosiphon programme in the Kawarau River and monitors Lake Wakatipu.	Lagarosiphon	Note	This is outside the scope of the Plan review and is an implementation matter. The Panel recommends that ORC staff respond to the Queenstown Lakes District Council separately.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.21	Queenstown Lakes District Council	If the ORC is planning to undertake monitoring and surveying of Lagarosiphon, we suggest it directly support the Lake Wakatipu Aquatic Weed Management Group and the Lake Wanaka Lagarosiphon Management so that all parties are working collectively.	ORC directly support the Lake Wakatipu Aquatic Weed Management Group and the Lake Wanaka Lagarosiphon Management	Lagarosiphon	Note	This is outside the scope of the Plan review and is an implementation matter. ORC currently supports these groups and will respond further to the Queenstown Lakes District Council separate to this process.
P312.24	Land Information New Zealand	6.5.7 Site-led programme for lagarosiphon management areas: 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.	Lagarosiphon	Accept	The submitter supports the inclusion of the lagarosiphon site-led programme.
P312.25	Land Information New Zealand	Plan Objective 6.5.7 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. Amend the wording of Plan Objective 6.5.7. Over the duration of the Plan actively manage lagarosiphon to: a) <del>progressively contain</del> 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. b) <del>sustainably control lagarosiphon in Lake Dunstan (Map 4 in Appendix 3)</del> implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3). c) <del>prevent</del> preclude the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3); d) <del>prevent</del> preclude the establishment of lagarosiphon in lakes, and rivers and tributaries excluding Lake Roxburgh and the Clutha River/Mata-au and its tributaries where it is not already present to avoid, mitigate or prevent effects on the environment, and amenity and recreational values.	Amend the wording of Plan Objective 6.5.7.	Lagarosiphon	Accept	The requested amendments will improve clarity.
P331.2	The Lake Dunstan Aquatic Weed Management Group	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.	Lagarosiphon	Accept	Supports the control of Lagarosiphon.
P331.3	The Lake Dunstan Aquatic Weed Management Group	Plan Objective 6.5.7 The terms 'progressive containment' and 'sustained control' should be used in this objective for clarity and consistency. Amend the wording of Plan Objective 6.5.7. Over the duration of the Plan actively manage lagarosiphon to: 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;</del> 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. b) <del>sustainably control lagarosiphon in Lake Dunstan (Map 4 in Appendix 3)</del> implement sustained control of lagarosiphon in Lake Dunstan (Map 4 in Appendix 3). c) <del>prevent</del> preclude the establishment of lagarosiphon in Lake Wakatipu (Map 4 in Appendix 3); d) <del>prevent</del> preclude the establishment of lagarosiphon in lakes, and rivers and tributaries excluding Lake Roxburgh and the Clutha River/Mata-au and its tributaries where it is not already present.	Amend the wording of Plan Objective 6.5.7.	Lagarosiphon	Accept	The requested amendments will improve clarity.
P335.41	Barrie Wills	In relation to [Section 6.5.2 - Lagarosiphon] No mention of Clutha River but it is precluded in section 6.5.7.	Clarify the inclusion of the Clutha River in the site-led programme for Lagarosiphon	Lagarosiphon	Reject	Objective 6.5.7 has been amended to remove specific reference to the Clutha River. Table 25 explains the presence of lagarosiphon in the Clutha River.
P335.43	Barrie Wills	In relation to [Plan Objective 6.5.7] Objective C: Lagarosiphon has already been found in Lake Wakatipu, so the objective must be to prevent RE-establishment.	Amend Plan Objective 6.5.7c to read "Preclude the re-establishment of lagarosiphon in lake Wakatipu"	Lagarosiphon	Reject	The Panel considers the objective as notified is sufficiently clear.
P006.1	James Taylor	First and foremost 1080 needs to stop. There is a high price for fur, encourage trapping. subsidise the price of traps, give them away etc to get young people out in the bush trapping and actually targeting the species you are trying to remove instead of producing a huge number of bykill from spreading poison from the air. We are meant to be a clean green country and it sickens me we dump poison by the ton all around New Zealand.	Stop the use of 1080 and encourage trapping instead.	Management Methods and Implementation	Reject	The purpose of the proposed Plan and Strategy is not to recommend specific control methods. The legislative control and use of 1080 is administered by the Environmental Protection Authority.
P006.2	James Taylor	As for big game animals Doc should come up with a plan agreed with the game animal council to organise culls for goats, pigs, deer, tahr so fellow New Zealand hunters get the chance to help remove numbers and also continue doing what they love as well as putting meat on the table for their friends and families. It is a shame and a waste if carcusus are just left to rot on a hill or in the bush somewhere knowing there are thousands of starving kiwi families throughout New Zealand.	DOC should work collaboratively with the Game Animal Council to organise game animal culls.	Management Methods and Implementation	Reject	This submission is out of scope and does not relate to the Plan which will be administered by ORC and not DOC.
P014.1	Kim Meredith-Jones	I am in support if humane pest management for rodents and possums	Support the humane pest management of rodents and possums.	Management Methods and Implementation	Note	Most of the rules in the Plan require people to control pests on land they occupy. How the land occupier controls that pest is the land occupier's responsibility. The Panel notes that where ORC staff or contractors undertake control work, Council follows animal welfare guidelines with all animal control programmes. This means using efficient and humane best-practice techniques and adhering to the Animal Welfare Act 1999 at all times.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P103.1	Claire Bell	I oppose all instant kill, kill traps, poisoning of all/any animals. Even those classified as pests in your proposed Pest Plan. These methods should all be banned, not funded. Please stop this now. Lead the way and impliment live capture traps only as pest control. Kill traps, instant kill traps and poisonign should nto be allowed. They are inhumane. Please stop allowing land owners to use any of these instant kill traps. These should be banned, not funded.	Control pest animals through live capture methods only.	Management Methods and Implementation	Note	See response to submission P014.1.
P106.3	Olly Laytham	On three occasions we have had dead rats apepar at the end of our section. Although we phoned, we could fin no one remotety intersted in following up. Surely room for improvement here.	No specific relief requested.	Management Methods and Implementation	Note	Rat management is a landowner responsibility.
P115.2	Ann Walker	I think it is muehlenbeckia australis that is not considered a pest plant in your plan. It has got a lot worse in the time that we have lived here. I have read on the internet that it provides shelter for insects.	Perhaps you could get DOC to put up one of their urban nature signs if that is the reason it is being left alone.	Management Methods and Implementation	Note	Muehlenbeckia australis is native to New Zealand and is not listed in the Plan.
P117.2	David F Smith	I am concerned for the coming generation if we poison everything with 1080 there will be nothing left you need to do more research as to why we have the biggest rate of cancer in the world there are few Hawks left either. We have the most beautiful country in the world and it is being destroyed. All of our waterways are contaminated. I am a fisherman but don't fish anymore, you can not drink or swim in our rivers. Me and many others are disgusted. This paradise is ruined.	No specific relief requested.	Management Methods and Implementation	Note	No specific relief requested. See response to submission P014.1.
P125.1	Jason Manakau	Im not opposed to the the pest management plan, but my submission is based on a one stop permit & access to those areas within the plan such as mt Cargill or city forests ceder farm where there is animals but "NO HUNTING" . Your procedures & processes will need to be sorted at local goverment end (you) with those property owners (city forest) where those approved can have access. This includes Goat & Quarintine Islands which would incur costs to be ferried to & from the islands, other than that contact should be made to the of ALL Deer Stalkers clubs around Otago of which i am a member of the Dunedin club & ALL club members have Public liability Insurance & as registered members we have the trusted firearms Safety, & Skills to carry out the proposed plan.. As a trusted member of west habour, I personally would be interested in assisting. contact details above.	No specific relief requested.	Management Methods and Implementation	Reject	The submitter's concerns relate to the permit processes providing access to private landholdings for hunting of feral animals listed in the Plan as site-led pests. Access to these areas is outside the scope of the Plan. However, the submitter's offer of assistance with control in the West Harbour area is acknowledged. The Panel advises that staff are available to work with volunteers in this area who are wanting to be involved.
P135.9	Noeline Bourke	I do not support any poison of any kind, namely 1080.	Opposed to use of poison, namely 1080.	Management Methods and Implementation	Reject	See response to submission P014.1.
P140.5	Just Doi	I support the site-led programme for the Otago Peninsula only if it does not include the use of poisons.	Site-led programmes do not include use of poisons.	Management Methods and Implementation	Reject	See response to submission P014.1.
P140.6	Just Doi	I support the site-led programme for West Harbour - Mt. Cargill only if it does not include the use of poisons.	Site-led programmes do not include use of poisons.	Management Methods and Implementation	Reject	See response to submission P014.1.
P140.7	Just Doi	I support the site-led programme for Quarantine and Goat Islands only if it does not include the use of poisons.	Site-led programmes do not include use of poisons.	Management Methods and Implementation	Reject	See response to submission P014.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P148.3	Rusty Knight	Thr council should tender the possuming blocks publically in the newspaper For local trappers or handlaid cyanide poison(feratox)1080 broadcasted by helicopter is a disaster. Thank you. Rats,stoats but possums should be controlled by known local trappers or handlaid cyanide poison. Not 1080.	Council to tender possum control operations. Oppose use of 1080.	Management Methods and Implementation	Reject	See response to submission P014.1.
P150.2	Julia Stewart	I strongly suggest you stop poisoning sentient, living beings under false pretense that it is necessary for protection of other species.	Opposes management of pest animals through poisoning.	Management Methods and Implementation	Reject	See response to submission P014.1.
P175.1	Joe Sherriff	My submission relates to all sections of Part Plan Establishment, but in particular to Section 4, Organism Declarations. Whereas I strongly support the plan in general, though it is a bit on the wordy side, I do not support or oppose any specific provisions as the provision I wish to see is not present at all. Nowhere in the proposed plan can I see any mechanism for adding any species, plant or animal to any of the pest categories in a timely fashion. It would appear that the only way this can be done is on review of the plan every 10 years. I respectfully submit that this is too long, and there should be a means for applying pest status to species when they are identified at a local level and are possibly able to be eradicated before they get out of control on a regional or even national scale. The following are examples that could be considered: Chinese clematis, Clematis tangutica. Opuntia species. Prickly pear cactus. This has been growing for a number of years as a garden escapee by the Rail-trail bridge in Alexandra. My submission is not that these plants should be added to the list, though that would be very acceptable, but to ensure that the plan has the flexibility to enable the ORC act promptly when a new pest species is identified locally. A final point would be for the plan to encourage publicity about pest species. If the public knows a plant or animal is a pest they are more likely to help it's control, if they don't they can't. For example, I do as much pest control as I can, but until I read the plan was not aware of African love grass which I see has been identified very close to my home.	Ensure there is capacity to adapt the plan to identify and introduce new pest plants in a short space of time, where these species have the potential to become widespread. Ensure better publicity around the species listed as pests in the Plan.	Management Methods and Implementation	Note	Amendments or additions to the Plan can be made as minor changes in accordance with Section 100G of the Biosecurity Act 1993, where this does not have a significant effect on any person's rights and obligations and is not inconsistent with the national policy direction. All other changes require a plan review in accordance with Section 100D of the Biosecurity Act 1993. ORC intends to provide more information about pests to the public and one of the key projects proposed in the strategy is to 'Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, and hieracium.'
P184.4	Lynne Stewart	Information is Key to allowing Otago to become the proud home of thriving ecosystems and rich biodiversity. Published pamphlets and booklets on our Indigenous Biodiversity and the Pests that threaten it, is needed. What we don't know of, we don't know to protect. Outcomes when ORC lists the above organisms as Pests, and publishes pamphlets and booklets on our Indigenous Biodiversity and these Pests that threaten it, would help you achieve your Biodiversity Strategy vision: "Otago is the proud home of thriving ecosystems and rich biodiversity." Listed Pests would be actively trapped & killed, ORC could operation of a pest trap library at of each of it's offices in Otago.	Increase information to public around pest species and biodiversity values.	Management Methods and Implementation	Note	ORC intends to provide more information about pests to the public and one of the key projects proposed in the strategy is to Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium. '
P184.6	Lynne Stewart	Rivers, Creeks, Lakes & Wetlands must be able to sustain Life, endemic aquatic life, especially that of our Native eels and Galaxids. Cows need to be listed as Aquatic Pest Organisms. Ecoli from cow shit & pee can make people violently sick when they ingest it, swimming or Kayaking in our Rivers. ORC must ensure it's "Unsafe for Human Use" notices aren't often displayed on its website. We need our children and grandchildren to be able to safely swim and kayak in our rivers without getting Water Poisoning and our eels and galaxids to continue living. Outcomes could include Riparian Planting information and support as well as the prosecution of farmers who allow both Dairy and Beef cows direct access to our creeks and rivers. On Tuesday 27th November , 5 Km before Lawrence (When travelling to Dunedin from Central Otago) we watched over 8 cows shitting and peeing in the creek that ran through the paddock they were fenced in. The farmer who has Not fenced his waterways must be prosecuted as well as Plant his Riparian Margins after fencing, so galaxid and eel death and human sickness doesn't result. Water Monitoring must be at more monitoring sites as well as monitoring after rain. Prosecution of those who pollute our waterways , leaving river(s) unsafe for human and killing off our aquatic ecosystems, must result.	Prosecute people who pollute waterways, promote riparian planting and fence waterways.	Management Methods and Implementation	Reject	This submission is out of scope as these matters are addressed under the Resource Management Act 1991.
P184.7	Lynne Stewart	Land Pest Plants must be identified and publicised, with differences clearly noted to make identification of Natives cf. exotic pest plants. ORC must identify, map & protect our endemic native plants growing on Private land. Native Broom must be clearly identified, mapped and publicised. What Council contractors don't know of, they won't save from their killer sprays. Cf. Spiny broom & Exotic Broom of which contractors spray to kill. Information is Key to allowing Otago to become the proud home of thriving ecosystems and rich biodiversity. People need to be informed about our Native Biodiversity. What we don't know of, we don't know to protect. We here in Otago are home to Unique Indigenous Biodiversity that we expect our Children and Grandchildren will be able to enjoy in the future, however that is fast diminishing. We hope it won't become lost forever. ORC's Pest Strategy must work in Tandem with ORC's Biodiversity Strategy with the vision: "Otago is the proud home of thriving ecosystems and rich biodiversity." We cannot achieve this vision unless we know what the endemic ecosystems and rich biodiversity includes and can clearly identify all pests.	More information and mapping for both pest plants and indigenous species.	Management Methods and Implementation	Note	The Panel notes that ORC intends to provide more information about pests to the public and one of the key projects proposed in the strategy states 'prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium'.
P196.2	Kylie Milne	And as for getting ride of pest it should be in live traps any other way is putting other animals at risk.	Live traps only.	Management Methods and Implementation	Reject	See response to submission P014.1.
P198.4	Gerry Essenberg	Amend 5.3 'Principal Measures to Manage Pests' to include that Council staff will respond to all service requests to investigate Good Neighbour breaches and report yearly to Council.	Sufficient Council staff are funded and available to investigate and report on breaches to Good Neighbour rules.	Management Methods and Implementation	Note	The Panel notes that ORC staff investigate all complaints and undertake compliance monitoring.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P199.2	Kim Clifton	2.furthermore the ORC stopped supplying cages for trapping opossums and magpies. (because a secretary got a fright one day when one was returned)	Council consider supplying cages for possum and magpie trapping.	Management Methods and Implementation	Reject	This is outside the scope of the Plan. ORC do not supply cages or traps but the Panel notes that staff can provide advice to land occupiers about trapping.
P238.2	Gillian Duguid	Laying poison in bush areas is a high risk behaviour that endangers not only the animals you are trying to target but all wildlife, and any humans that may wander into the bush.	Opposes the use of poisons.	Management Methods and Implementation	Reject	See response to submission P014.1.
P239.1	Taieri District Pig Hunting Club	We support the management and eradication of feral pigs in the Otago area. Our club was established 25 years ago, with some members that have been hunting for more than 50 years. We appreciate that eradication is not an easy fix. We have seen what the feral pig can do to our biodiversity in the area as well as the commercial farming activities that support our region and we want to minimise that impact as much as possible. We would like the ORC to provide an easy pathway for clubs such as ours to access land to hunt feral pigs in a safe and efficient way. We pay for our own insurance and operational costs, but just need access to land. We don't require payment for our time but as it is a hobby it is usually a weekend activity. We are happy to operate a formal process whereby the ORC know who is responsible for access to the particular sites the ORC wishes to make available during any given time period. We already have a good working relationship with local companies and other recognised organisations such as Wenita and the Ben Rudd Trust (land owners next to the Pineapple track) and privately owned farms (such as Table Hill Farm owned by Tony Homer). We are usually called upon to eradicate feral pigs which are causing a disturbance to their business operation and stock quality. Our method of hunting involves the use of dogs (stock proof) and knives (traditional method), with firearms (as required for self-defence). All firearms users are properly licenced by the NZ Police and vetted through the Club. We think our interests are complimentary to the the Pest Management Plan that could result in some really efficient and cost effective outcomes for both. Please feel free to contact us if you have any questions.	Provide and easy pathway for pig hunters affiliated to a club to gain access land to hunt feral pigs	Management Methods and Implementation	Note	This is outside the scope of the Plan. Access to private land for hunting purposes is by agreement between the hunter and property owner. The Panel notes that ORC staff will respond directly to the Taieri District Pig Hunting Club. G1003
P253.1	SPCA	SPCA acknowledges the efforts of the Otago Regional Council to protect the biodiversity of the Otago region of New Zealand. Protecting biodiversity is important for the ecosystem health and welfare of native wild animals within these ecosystems. SPCA is also deeply concerned with the welfare of the animals that are not native to these ecosystems and are the subjects of control and eradication programmes listed in this proposal. We acknowledge that there are times when controlling the populations of non native wild animals is necessary to protect native wild animals; however, these efforts should be conducted with the utmost concern for the welfare of the targeted species. Our aim is to encourage the Otago Regional Council to prioritise the welfare of all animals affected by the Proposed Plan. SPCA believes that promoting more humane methods of controlling targeted animals and promoting education about humane treatment of animals for all involved parties will better achieve the goals of the Proposed Plan.	Methods of controlling animals should be humane.	Management Methods and Implementation	Note	See response to submission P014.1.
P253.10	SPCA	Considerations for lures: Traditional lures have generally used food-based compounds that are attractive to animals (usually possums) but trap catch rates have historically remained low. An effective long distance lure would increase the overall efficacy of both traps and toxin delivery systems, while also increasing the area over which that traps are effective. Both Zero Invasive Predators Ltd. (ZIP) and The Cacophony Project are two small start-up organisations making positive contributions to the development of alternatives to the widespread and indiscriminate application of toxins. SPCA acknowledges that the Otago Regional Council considers toxins are an important tool for controlling and eradicating animals perceived as pests. The Society is against the use of toxins in their current form because of the inhumane death that results in their use. However, because of their widespread use in the management of perceived pests, we believe everything possible should be done to improve the current toxins and delivery to decrease the suffering they cause for both targeted and non-targeted animals.	Council consider recent innovations in lures. Use and delivery of toxins should be improved to decrease animal suffering.	Management Methods and Implementation	Note	See response to submission P014.1.
P253.11	SPCA	Considerations for killing fish and crustaceans: There are a number of aquatic animals considered organisms of interest (OOI) in the Proposed Plan including Asian paddle crabs. SPCA is concerned with the welfare of these animals and the proposal is unclear about how these animals will be killed if they do become classified as pests in the Otago region. Research on crustacean behaviour, physiology, and cognition indicates these animals are sentient beings and can experience negative states of welfare such as pain and stress when handled or killed (Elwood et al., 2009). Additionally, crustaceans are considered sentient under New Zealand law (Animal Welfare Act, 1999). Current regulations for the killing of crabs require they are rendered insensible prior to killing, unless a person is removing them from the wild for imminent destruction (Animal Welfare (Care and Procedures), 2018). Humane killing of crabs should not be based on whether they are farmed or wild. Therefore, SPCA strongly encourages the use of methods that stun crabs considered pests prior to killing. Crabs that have been effectively and humanely stunned will need to be killed with an additional method such as the destruction of nervous system in both the head and thorax.	If controlled, Asian paddle crabs should be rendered insensible prior to killing, and then killed using humane methods.	Management Methods and Implementation	Note	Asian paddle crab is not a Pest proposed in the Plan. See response to submission P014.1.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P253.12	SPCA	Otago Regional Council should strengthen their community engagement by promoting activities that align with public concerns and values. For example, educating landowners on more humane trapping and killing of animals may create a more sustainable effort if landowners are concerned about reducing the suffering of trapped animals on their property. All Otago region occupiers that will be encouraged and/or required to participate in the Proposed Plan activities should be educated on the most humane ways of using lethal means to control animals (as described in the previous section) on their property or in their communities. Education efforts should also promote the welfare of animals kept as companions that are potentially negatively impacted by control methods. These are important for animals such as cats and rabbits.	Council should engage the community in education on humane pest management, and the promotion of welfare of companion animals that may be impacted by pest control methods.	Management Methods and Implementation	Accept	ORC intends to provide more information about pests to the public and one of the key projects in the strategy is to 'Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium'. Action 3.1.4 of the Strategy also states that ORC will: 'Advocate and educate people and communities on the best technologies available and new innovations to manage harmful organisms where these provide more efficient, effective, and humane control techniques'.
P253.2	SPCA	Using more humane approaches to control targeted animals: SPCA encourages the Otago Regional Council to more clearly identify the nature of methods used to control or eradicate perceived pests described in the proposal. Currently, perceived pests will be managed under programmes that rely on, "a suite of tools to be applied in appropriate circumstances" (Otago Regional Council, 2018, p. 23). The language in this section is vague and it is unknown precisely how certain activities will be conducted. For example, under the third option for Service Delivery, the proposal indicates that the council may provide biological control agents and provisions such as traps, baits, and chemicals, but does not specify exactly what these agents or provisions will be. SPCA has serious concerns with this language because it does not distinguish between methods of control that create greater harms to the welfare of targeted animals from those methods that have been demonstrated as more humane. Additionally, SPCA is concerned with the risks to non-targeted animals. Considerations for the types of methods to control or eradicate perceived pests are described below.	Identify pest control methods in the Plan.	Management Methods and Implementation	Reject	It is not appropriate to identify control methods in the Plan and information on control methods will be provided through information and advice. See response to Submission P253.7.
P253.5	SPCA	Considerations for rabbits: The Proposed Plan indicates that biocontrols such as rabbit haemorrhagic disease (RHD) are a useful method to control rabbits (Otago Regional Council, 2018, p. 58). SPCA strongly opposes the use of viruses or other biological control methods in their current form to control the population of any animal species, and advocates that more humane methods of population control are adopted instead. SPCA does not consider the purposeful release of RHD (including RHDV1 K5) as a humane method for killing rabbits because of the length of time it takes for an animal to succumb to the disease, and the symptoms they experience. Most individual rabbits that contract RHD will experience death within 48-72 hours, and it can take up to 1-2 weeks for some rabbits to die after exposure (Abrantes et al., 2012). Acute symptoms can include anorexia, apathy, eye inflammation, and neurologic symptoms; other symptoms include excitement, paralysis, and loss of voluntary body movement, respiratory signs, foamy and bloody nasal discharge; tearing of the eyes, and bleeding from the eyes and nose (Abrantes et al., 2012). Additionally, as well as affected feral rabbits, RHD can negatively impact rabbits that are farmed or kept as companion animals in areas where it is found in feral rabbit populations, and no cure is available (Abrantes et al., 2012). SPCA is also deeply concerned about the in-burrow control methods for feral rabbit populations. Warren ripping requires mechanical destruction of the burrow and relies on suffocation or crushing to kill the targeted animals (Sharp, 2012c). Warren ripping is not commonly performed in New Zealand, however, efforts in the Otago region have led to mixed results with how successful this is as a method to control feral rabbits (NPCA, 2012). The Rodenator is a tool that uses percussive stunning from ignition of LPG and oxygen that has been pumped into the warren (Landcare, 2010). Although not commonly used in New Zealand, the lack of research demonstrating rabbits are killed from percussive stunning and not from severe burns, suffocation, or prolonged death from wounds has resulted in this method being evaluated as causing extreme negative welfare impacts (Landcare, 2010).	Humane methods should be used for rabbit control and biocontrol methods and warren ripping and the use of rodenator tools are opposed.	Management Methods and Implementation	Reject	See response to submission P014.1. ORC does not promote warren ripping as a control method. Furthermore, the release and use of RHD is regulated by the Environmental Protection Authority.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P253.6	SPCA	<p>Considerations for shooting animals: Many of the animals targeted in the Proposed Plan are commonly controlled through recreational and commercial hunting, including daytime and night-time shooting. Lethally controlling animals by shooting is often considered a relatively more humane practice than other methods of control (Littin et al., 2014). A humane shooting is one that should result in the least amount of time between when the animal is shot and until it is insensible and dead (Aebischer et al., 2014; Sharp, 2012b; Stokke et al., 2018)... Targeting an animal's brain, or lungs and heart is considered to bring about the quickest death (Stokke et al., 2018). However, distance between the shooter and animal impacts the probability that an animal is killed when shot (e.g. the closer the distance, the higher probability of a more humane kill; Aebischer et al., 2014; Hampton et al., 2015). Additionally, the more comfortable and less rushed a shooter feels, increases the probability a shot will kill an animal (Aebischer et al., 2014). Best practices for ensuring a more humane shooting include: ☐ Shooting must be performed by shooters who are trained, experienced, and skilled; ☐ The animal can clearly be identified and seen before shot; ☐ The correct firearm, ammunition, range and shot placement is used; and ☐ Any wounded animal is promptly killed (Sharp, 2012b). Aerial shooting is used to manage animals such as pigs (PestSmart, 2015, September 1) and goats (PestSmart, 2015, August 26), and is not considered as humane as ground shooting because of increased alertness and fear of the helicopter used during the hunt. Consistent with ground shooting of animals, aerial hunting relies on a well-trained shooter who can take clear shots, but also requires a skilled pilot to help position the shooter to take the most humane shots (Sharp, 2005, 2012a). The ability for the shooter to determine if an animal is dead is hampered by the distance, therefore, shooters should use a minimum of two shots per animal to ensure it has been effectively rendered insensible and dead (Sharp, 2005, 2012a). Herd animals such as deer and feral goats may be mustered by ground or aerial techniques into confined pens prior to shooting or selecting for transportation for slaughter. Mustering can cause a variety of stressors to animals... (Sharp, 2005). Mustering exacerbates the welfare harms of subsequent trapping and shooting as the animals are already potentially experiencing poor states of welfare prior to experiencing the harms caused from ensuing lethal methods (Sharp, 2005). Killing or mustering of animals also impacts the welfare of surviving herd members that are left without a social group (Dubois et al., 2017). Shooting animals that have dependent offspring must be avoided to reduce the welfare harms to the offspring. If lactating animals are killed, then efforts should be made to find and humanely kill the surviving offspring (NPCA, 2015c, November; Sharp, 2005, 2012a, 2012b).</p>	Shooting of animals should follow best practice.	Management Methods and Implementation	Note	The Panel agrees that that the shooting of animals should follow best practice.
P253.7	SPCA	<p>Considerations for hunting with dogs: SPCA is opposed to the hunting of any animal with dogs. Hunted animals experience considerable psychological and physical suffering and, often, a brutal and prolonged death. Hunting pigs with dogs is the most common method of lethal control used for feral pigs in New Zealand (NPCA, 2015c), and may be used to control wallabies (NPCA, 2015b), and deer. For species such as pigs, dogs can cause significant welfare harms if they are allowed to attack and/or hold a pig by biting its body parts. For species such as deer, it has been demonstrated that hunting with dogs causes significant harms to their welfare in part because of the stress from prolonged chasing (Bradshaw &amp; Bateson, 2000). It is logical that any animal pursued by hunting dogs will experience significant stress. The Society is also concerned about the suffering that can be caused to non-target animals, such as kiwi, and to the dogs. Dogs have historically been a major threat to kiwi populations in New Zealand (Holzapfel et al., 2008). Aversive methods to teach dogs to not approach non target animals, such as electric shock, noxious odours, and inducing illness (see Jones, 2006) may discourage hunting dogs from preying upon birds such as kiwi. However, the welfare harms to the dog from using electric collars, including fear, pain, and stress, must be taken into account in determining if this an acceptable option for controlling hunting dogs (Dale et al., 2013). Additionally, dogs can suffer welfare harms while participating in hunts, notably injuries from feral pigs including tail injuries (Wells, 2013), and goring injuries from pig tusks, and injuries related to falls and running through the bush such as lacerations, broken limbs, pad injuries, sprains and strains.</p>	No specific relief sought.	Management Methods and Implementation	Note	This is outside the scope of the Plan. ORC intends to provide more information about pests to the public and one of the key projects in the Strategy is to 'Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium'. Action 3.1.4 of the Strategy also states that ORC will: 'Advocate and educate people and communities on the best technologies available and new innovations to manage harmful organisms where these provide more efficient, effective, and humane control techniques'. Feral pigs are included in the Dunedin site-led programmes only, and there are no rules in the Plan requiring land occupiers to control feral pigs throughout Otago. Feral deer are managed under the Wild Animal Control Act 1977, which is administered by DoC. The reason for their inclusion in the Dunedin site-led programmes is to ensure that ORC can support communities and other organisations (such as DoC) in controlling feral pigs in these areas where this is needed to protect biodiversity values.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P253.8	SPCA	Considerations for using traps: The Proposed Plan includes a number of targeted species that will be trapped. Welfare concerns with trapping animals include: the stress caused to the trapped animal with live-capture traps, the potential for self-injury and injury from the trap, the potential for a prolonged time to unconsciousness, and inhumane causes of death. SPCA strongly advocates that, if traps are to be used, the Otago Regional Council should only use and promote kill-traps that have passed the NAWAC welfare performance class A testing criteria for the specific species targeted.... SPCA also advocates that trappers use live-capture traps that restrain the animal without causing pain, injury, or distress followed by humane killing. If live-capture traps are used, they should be checked at least every 12 hours and the trapped target animal humanely killed as soon as possible. Traps set in exposed areas without shade will need to be checked before the heat of day to reduce heat stress from exposure to sun (NCP, 2015c). SPCA is opposed to the manufacture, sale, and use of all leg-hold traps due to the unacceptable suffering they cause and the indiscriminate nature of the way they catch animals. The Society is against all types of leg-hold traps as our organisation does not believe that they can ever be used humanely. Leg-hold traps consistently rank lower as a humane method compared to other methods of control for many species including feral cats (PestSmart, 2018, February 1) and feral rabbits (PestSmart, 2018, April 5). Leg-hold traps for possums have been evaluated as causing moderate to extremely negative welfare impacts because of the injury caused by these traps and psychological effects such as anxiety, pain, fear, or distress caused over the duration the animal is caught (Landcare Research, 2010). It is also important to consider the welfare of non-targeted animals in the choice and positioning of traps. One pathway to unintentional poisoning occurs when non-targeted animals directly consume bait in traps. Many traps are designed to exclude non-targeted animals which helps reduce unintended harms of controlling and eradicating targeted animals....	Management of traps should operate at best practice. The SPCA opposes the use of all leg-hold traps.	Management Methods and Implementation	Note	This is outside the scope of the Plan. ORC follows animal welfare guidelines with all animal control programmes. This means using efficient and humane best-practice techniques at all times.
P253.9	SPCA	Improvements in toxin delivery: Although SPCA opposes the use of toxins in their current form to kill animals due to the inhumane nature of this method, the organisation recognises that improvement in toxin delivery can increase humaneness and minimise non-target animal impacts. Resetting toxicant delivery systems allow the delivery of a toxin to an individual animal, rather than the widespread indiscriminate application of toxins. For example, the Spitfire toxicant delivery system is a tree-mounted device developed in New Zealand that provides continuous control of possums (Connovation Ltd, 2014). The target animal triggers the administration of a toxin onto its abdomen by standing on a weight-activated platform and touching a lure. The toxin is then ingested by the animal through grooming. The device is self-resetting and in the most recent field trials have remained functional and reliable for several months achieving a 92% kill rate of radio-collared possums (Eason et al., 2017). In addition, a digital tracking plate that identifies the species based on their footprint was independently developed and is being integrated into Spitfire technology to increase species specificity (Campbell et al., 2015). Increased target specificity also allows the use of more humane toxins (Blackie et al., 2013).	No specific relief sought.	Management Methods and Implementation	Note	See response to submission P014.1.
P258.25	Forest and Bird	Regulation and Voluntary Measures: The Council should not shy away from a regulatory or compulsory action approach in controlling pests. Pest control needs to be co-ordinated at a regional level, and decisions made at that level must be translated into action on the ground. A purely voluntary approach cannot give this assurance, and would result in ad hoc and inconsistent results. Similarly, the Council should not be reluctant to charge landowners with the costs of pest control on land for which they are responsible. Charging for pest control simply internalises a cost of farming which would otherwise be borne by the environment or other farmers, which is an unjust and unfair.	Council ensure appropriate regulatory/compulsory action is undertaken in implementing the Plan.	Management Methods and Implementation	Note	ORC will enforce the rules in the Plan.
P258.5	Forest and Bird	In addition to the development of annual operational plans Forest and Bird considers that it would be prudent for specific pest management programs – especially the eradication and exclusion zone pests and the site lead programs to be independently reviewed by external experts to assess the success or otherwise and carry out adaptive management if needed.	An independent review process is established, particularly for eradication and exclusion pests.	Management Methods and Implementation	Reject	As an Operational Plan is to be reviewed and reported on annually, as a requirement of Section 100B of the Biosecurity Act 1993, and will be publicly available, an independent review of the Plan is not considered necessary.
P260.2	Bronwyn Judge	I am also concerned that toxic chemicals should only be used when necessary. Mechanical means of removing pest plants should be used in preference.	Toxic chemicals used to control pests only when necessary.	Management Methods and Implementation	Note	See response to submission P014.1.
P260.4	Bronwyn Judge	To protect our biodiversity it is also necessary to prevent the use of neonicotinoids that harm insect life and aquatic life. These are often mixed in weedkillers such as Roundup as a fixative.	Prevent the use of neonicotinoids.	Management Methods and Implementation	Note	See response to submission P014.1.
P261.2	Chris Jenkins	Consider easier access to areas for hunters	Provide ease of access to land for hunters.	Management Methods and Implementation	Reject	This is outside the scope of the Plan. Access to private land for hunting purposes is by agreement between the hunter and property owner.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.3	Queenstown Lakes District Council	Education is an important element to help people understand the Plan's rules, how the rules should be interpreted, and how they will be enforced. The ORC plays a vital role by providing clear information on monitoring, enforcement and penalties, in parallel with educating and incentivising landowners.	No specific relief sought.	Management Methods and Implementation	Note	ORC intends to provide more information about pests to the public and one of the key projects in the strategy is to 'Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium'. The Plan contains information about monitoring and enforcement, but this information can also be made available on the 'pest hub' too when it is developed, so that information regarding enforcement and penalties is clear.
P264.1	Papatowai & District Community Association	The Papatowai district is a small community comprises predominantly of crib owners with few residents. In recent years there has been a substantial shift in the attitudes of the majority toward the preservation and enhancement of the natural environment. At each of the meetings of the Papatowai and Districts Community Association meetings for decades, a large proportion of the discussion relates to enhancements for our natural environment; that is, Papatowai is a committed community that will actively engage with other organisations to control pests. Even though Papatowai is one of the larger centres within the Catlins, the number of able-bodied, enthusiastic volunteers who contribute to pest control is small. This small group of volunteers have contributed many 100's of hours to control pests in the immediate locality, but the challenges of the surrounding region are huge in comparison. Papatowai, like so many other small rural centres in Otago seeks more resources in terms of manpower, organisational abilities and cash. We need leadership and assistance from the Otago Regional Council to initiate, support and help complete pest control programmes. 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.	Additional support for pest control in the Papatowai district.	Management Methods and Implementation	Reject	This submission relates to implementation in terms of the establishment of a collaborative pest control programme in Papatowai. The strategy sets out a number of actions to support people and communities with pest control. Additionally, ORC operates an ECO fund which contributes \$250,000 a year to work and projects that support biodiversity and the environment. More information about the ECO fund is available on the ORC website.
P264.3	Papatowai & District Community Association	We recommend coordinated and consistent strategies for weed control that are shared by DOC and also by local councils (in our case Clutha District Council) within Otago. Pests do not respect property boundaries and therefore we require cross-boundary coordination.	Better coordination between agencies involved in pest management is required.	Management Methods and Implementation	Note	This is an implementation matter. The Panel agrees that this is important for successful biosecurity management and ORC's approach to working collaboratively with communities and groups is outlined under Action 3.3 of the Strategy.
P264.5	Papatowai & District Community Association	We wish to draw attention to pest control activity in the Papatowai districts: a) We have active Barberry Busting group that has spent over 500 hours to eradicate barberry in the Papatowai village. This group has provided a separate submission. We know that we can eradicate barberry from selected areas since the source of seeds mostly comes from large 20-50 year-old trees. An example is shown below, the brown areas showing the size of some of the barberry trees that we have busted. b) A coordinated wasp control programme in 2018 (to be repeated in 2019) was planned and performed by a local resident and financed by the Papatowai and District Community Association. Assistance and support from an expert organisation such as ORC would have been welcome. c) A coordinated stoat and rat control operation is about to be initiated in Papatowai and adjacent areas. Again, this is being designed and coordinated by a local volunteer and paid for by residents. d) A trapping programme to protect nesting seabirds is in place in the Papatowai Scenic Reserve. Again this was organised by local residents. e) An OSPRI possum control operation targeted possums in Papatowai township and surrounding bush in winter this year. These are just a few examples that demonstrate the need for enhanced pest control. We know from local observation that infestations continue to grow unless actively controlled and we need more action now. It is false economy to delay efforts to control these and many other obvious pests. Therefore it is essential that ORC's 10-year plan is ambitious. There is considerable community good-will and enthusiasm to control pests in our district – just imagine what we could achieve together if the Otago Regional Council used its natural leadership position to muster this energy throughout the region, and to give us all a step up. We are looking for your leadership.	Greater assistance and support is provided to local community pest management efforts by Council, and the Plan is more aspirational to enhance pest management in the region.	Management Methods and Implementation	Note	See responses to submission P265.1-3. The Panel notes that ORC staff will contact the Papatowai & District Community Association about how Council can support them with their pest management goals outside the Plan process.
P266.17	Lindis Pass Conservation Group Inc	Appendix One. Organisms of Interest. Hieracium (hawkweed): Hieracium species are invasive pest plants which have spread massively through the high country, varying from sun-dependant to shade-tolerant sites. We submit that the ORC should actively support the efforts being made by LandCare to find a control for Hieracium, especially on conservation land where "successful farming techniques" and applications of fertiliser have no relevance.	ORC to actively support Landcare in the pursuit of bio-control techniques.	Management Methods and Implementation	Note	ORC contributes to the national Bio Control Collective which researches and tests biocontrol agents for use in New Zealand. However, the Panel is not aware of any effective biocontrol agent for Hieracium at this time.
P271.1	Jim Gladwin	I'm opposed to the use of 1080 and other poisons, e.g, brodifocum for eradication of animals currently classified as pests. Because there are opposing scientific viewpoints relating to 1080, I urge the Regional Council to adopt the 'Precautionary Principle' and stop using this controversial chemical, and/or approving use by others, until more facts are understood. Should we need reminding of past tragedies caused such 'harmless' substances as DDT, Thalidomide, 245T, asbestos, etc, I refer you to this research, below, from the University of Otago.	Oppose use of 1080 and other poisons for the eradication of pest animals.	Management Methods and Implementation	Reject	See response to submission P014.1.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P275.1	Guy Percival	My request is that the ORC reviews its acceptance of the blanket application of 1080 (sodium monofluoroacetate) anywhere in Otago.	Review the use of 1080 for pest management	Management Methods and Implementation	Reject	See response to submission P014.1.
P277.1	Jane Matchett	Bring Back a Pest Eradication Board, that detects threats, readily identifies the issues, actively responds, allocates resources and eliminates all pests in order of priority and potential threat to each regions significant flora and fauna. There seem to be many different companies with similar roles, possible over laps	Re-introduce Pest Eradication Boards.	Management Methods and Implementation	Reject	This submission is outside the scope of the Plan.
P286.8	New Zealand Transport Agency	Section 6.3 Pests to be managed under progressive containment programmes: Progressive containment aims to reduce the number of sites infested as well as the density of infestation over the next 10 years. For Coastal Otago area of the Transport Agency this applies to the following pests: Bomarea, Boneseed, Bur Daisy, Cape ivy, Nassella tussock, Old man's beard, Perennial nettle, Spartina, White edged nightshade, Wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch. The Good Neighbour Rule applies to these pests and is a requirement for the Transport Agency.	The Transport Agency supports this ORC managed programme. The Transport Agency expects to receive support and be assigned high priority in the Regional Land Transport Programme from the Otago Regional Land Transport Committee to increase the likelihood of funding being obtained from the National Land Transport fund to support pest control in the road corridor and Transport Agency controlled Crown land.	Management Methods and Implementation	Reject	NZTA's support for the progressive containment programmes is noted. Any decision of the Regional Land Transport Committee with regards to funding arrangements is a separate process that is outside the scope of the Plan review.
P286.9	New Zealand Transport Agency	The Transport Agency requests that the council act to coordinate control between landowners in the control of old man's beard. Because it is a vine, the source of the actual main 'trunk' may be located on one property while the vines etc are on other properties. Therefore, there needs to be cooperation between land owners to control this species.	The Transport Agency requests that the council act to coordinate control between landowners in the control of old man's beard.	Management Methods and Implementation	Note	The Panel supports coordinated control where old man's beard is established over multiple properties and can assist where needed. However, it is noted that the control of old man's beard is a land occupier responsibility.
P288.2	Mainland Environmental Trust	We call for an immediate and urgent STOP of all toxic poisons used for animal management , we also encourage the use of bounty systems , eco fur industry and the likes of a rabbit board as a way forward to manage an abundance of species. We ask that as stake holders of the NZ wilderness people of the land , hunters , bushman , environmentalists , nature photographers , fisherman etc are inc in talks and negotiations of a way forward as part of a fair and democratic process	Prohibit the use of poisons for animal management and use of bounty systems and rabbit boards.	Management Methods and Implementation	Reject	See response to submission P014.1.
P289.10	Director General of Conservation	Implementation of the current PFD programme will occur over the next 5 years. I recommend that the ORC consider reducing its planning time frames set out in in the proposed Biosecurity Strategy Landscape Scale and Site Scale table on page 32 to enable PFD to initiate its work as soon as possible. I support the submission of Predator Free Dunedin.	Accelerate the implementation timeframes for site-led programmes.	Management Methods and Implementation	Accept in part	The Panel is satisfied that the timeframes requested by the submitter in relation to the first two projects are appropriate and it is recommended these timeframes are reduced to 6 months and 12 months respectively. However, the Panel accepts the staff recommendation in relation to the 3rd project that this timeframe remains unchanged.
P289.2	Director General of Conservation	The plan proposes that ORC's activities will be set out in 12-month operational plans, to be updated and reported on annually. An annual audit of programme success is supported. In addition, I recommend an independent audit be undertaken several times during the life of the RPMP to help the Council ensure its approach is well-targeted, effective, tracking towards the desired outcomes, and identifies any additional mechanisms or circumstances needed to achieve those outcomes.	Periodic independent auditing of the Plan.	Management Methods and Implementation	Reject	An Operational Plan to be reviewed and reported on annually is a requirement of Section 100B of the Biosecurity Act 1993, and will be publicly available. An independent review of the Plan is not considered necessary. However, there is nothing in the Plan that prohibits an independent audit of the Plan being undertaken at a later time if deemed necessary.
P293.1	Otago Peninsula Biodiversity Group	In order to progress towards identified conservation and pest management objectives OPBG recommend formally including an independent review of achievements by external expert every two years (minimum). The proposed two-year review period would support OPBG's goal to eradicate possums from the Otago Peninsula by 2023 and enable the ORC to achieve PFD milestones within the timeframes identified in our contractual obligations with PF2050 Ltd. In addition, such a review stage would help identify required actions and could provide a mechanism to include additional site-led programmes or sub-programmes.	Introduce an independent review of achievements every 2 years (minimum).	Management Methods and Implementation	Reject	See response to submission P289.2. This does not restrict ORC from supporting OPBG and Predator Free Dunedin in meeting contractual obligations with Predator Free 2050 Limited.
P293.13	Otago Peninsula Biodiversity Group	Point 7 (page 87): OPBG is looking forward to the ORC getting involved in the monitoring of pest species. We suggest the ORC could facilitate the standardisation of data management across all stakeholders/groups involved with Predator Free Dunedin so data are recorded and reported on in a consistent manner. These data should inform regular independent review by external experts.	ORC should facilitate the standardisation of monitoring methods.	Management Methods and Implementation	Note	This is an implementation matter and the Panel notes that staff can discuss the standardisation of monitoring with the submitter outside the formal Plan review process.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P293.15	Otago Peninsula Biodiversity Group	Key project/action listed on page 32 need to be implemented faster to better support the ambitions of Predator Free Dunedin.	Reduce the timeframes for the actions listed below as follows: 17.1 "Contribute to the development of the Predator Free Dunedin 2050 'whole of site' management plan/s" – reduce from 12 to 6 months. 17.2 "Following the establishment of the above plan, establish a plan of action for ORC's role in the delivery of the plan outcomes" – reduce from 18 to 12 months. 17.3 "Develop guidance on how ORC can support groups with smaller site-led initiatives to manage harmful organisms." – reduce from 12 to 6 months.	Management Methods and Implementation	Accept in part	The Panel is satisfied that the timeframes requested by the submitter in relation to the first two projects are appropriate and it is recommended these timeframes are reduced to 6 months and 12 months respectively. However, the Panel accepts the staff recommendation in relation to the 3rd project that this timeframe remains unchanged.
P294.5	Save The Otago Peninsula	STOP emphasises the need for greater resources allocated for council inspections and enforcement. One example is Bomarea vines that are regularly found which have flowered and produced fruits with seed. Bomarea was listed in the 2001 ORC PMS 4.10.2 as a pest plant with the objective of Eradication from the Otago Peninsula within 5years. Greater resources might have achieved eradication. Pudding Island, Titiremoana, administered by DCC, close to Portobello, is one site where access for inspection is difficult and STOP suggests use of a drone to identify Bomarea vines in flower. In the past this small island was overrun with Bomarea, creating a massive seed source close to Portobello. Goat Island, Rakiriri, administered by DoC, is another site where Bomarea vines are now more widely distributed than first observed by STOP in 2001. STOP would like to see ORC undertake regular monitoring of both islands as informal checking of the islands should not be left to Peninsula residents.	Greater resources allocated to inspection and enforcement.	Management Methods and Implementation	Note	The anticipated annual cost of implementing the Plan is estimated to be \$1,897,000 subject to the long term plan and annual plan processes. This is a doubling of the current expenditure. This will include the ability to undertake additional inspections and support pest control activities within the Dunedin site-led areas. We find the implementation costs to be acceptable. On that basis, we recommend that the ORC considers increasing the funds allocated for Plan implementation purposes through the annual planning process 2020/21 and subsequent years for the life of the Plan.
P294.7	Save The Otago Peninsula	Plant pests: STOP has been controlling Chilean flame creeper on several Peninsula sites since 2008, and our ongoing monitoring indicates this vine appears to have been eradicated at several sites. In 2018 we used a drone for surveillance of 2 important bush remnants, and the footage proved most helpful in identifying the location of one vine in dense bush. STOP has been working since 2009 with landowners, and various groups to reduce Darwin's barberry in the Pukehiki area of the Peninsula and along the ridge to Hereweka Harbour Cone. We have concentrated our efforts not only on road reserves, but also walking tracks and private land. Money for herbicides has come from several grants and this year a donation from a private company paid for a contractor to work on a particularly dense area of Darwin's barberry. This is a priority pest plant for STOP and one where on-site help from ORC would be appreciated. Banana passion fruit is mainly located on the harbour side of the Peninsula though isolated vines appear (and are eradicated when found) at Pukehiki and around Papanui and Hoopers Inlets. Without continuing control, banana passion fruit has the potential to spread into isolated bush remnants and into the coastal reserves at Sandymount and Boulder Beach. One very large infestation is in urgent need of control, as it is seeding into a STOP planting area and regenerating bush but is too big a task for volunteers. Sycamores are mostly present as isolated trees or small groups on the Peninsula. STOP has had help from Otago Polytechnic Arboriculture students in removing large trees at 2 sites. However, sycamores have seeded in dense bush remnants and removal of seed sources is important. Gunnera tinctoria is popular with gardeners but STOP feels it is important to send the message that this plant produces vast quantities of seed and is difficult to get rid of. Self-seeded Gunnera plants are present in open ground close to waterways on the Peninsula. Tradescantia is particularly difficult to get rid of and persists in shaded areas.	Further support for the removal of listed species on the Peninsula.	Management Methods and Implementation	Accept	These species are included in the Dunedin site-led programmes and ORC will work with communities to support the control of these species.
P295.10	Landscape Connections Trust Halo Project	We recommend there be an independent monitor/audit be undertaken every 2 years (minimum) of how well we are all tracking towards achieving the objectives of the PRPMP. This review may include recommendations on what additional measures are required to ensure that the objectives will be achieved in full and on time. This review may also identify any additional enforcement mechanisms that may need to be added to the site-led programmes e.g. providing ORC with access to properties to undertake works and recover costs from the occupier (in addition to the powers conferred by section 52 and 53 of the Biosecurity Act 1993). In regard to monitoring, LCT and other PFD Delivery Partners are required to do monitoring as part of our PF2050 Ltd contract and this requires independent verification. Including a similar independent verification requirement into the PRPMP would meet the needs of LCT, OPBT, PFD and ORC, ensuring the ORC annual operational plan and PRPMP objectives are being met, and also that the PF2050 Ltd contractual objectives are being met.	Council provide for independent monitoring or auditing of plan implementation against objectives, every 2 years (minimum).	Management Methods and Implementation	Reject	See response to submission P293.1. This does not restrict ORC from supporting OPBG and Predator Free Dunedin in meeting contractual obligations with Predator Free 2050 Limited.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P295.9	Landscape Connections Trust Halo Project	We note that further details of ORC's activities will be set out in a 12-month operational plan (produced in accordance with s100B of the Act), which will be updated and reported on annually. Clarification is sought as to when the first operation plan will be developed by. LCT requests public engagement in developing the annual operational plan so that we can assist ORC in ensuring that resources are appropriately allocated.	Clarification is provided around deadlines for the operational plan supporting the RPMP, and opportunity is provided for public engagement on the operational plan.	Management Methods and Implementation	Note	The Operational Plan is required to be prepared within 3 months of the Plan becoming operative. As this is an ORC operational document, no opportunity for public engagement will be available. The requirements for the Operational Plan, and reviewing and reporting on the Operational Plan, are set out in Section 7.2 of the Plan, and in detail in Section 100B of the Biosecurity Act 1993.
P298.10	Predator Free Dunedin	We recommend there be an independent monitor/audit be undertaken every 2 years (minimum) of how well we are all tracking towards achieving the objectives of the PRPMP. This review may include recommendations on what additional measures are required to ensure that the objectives will be achieved in full and on time. This review may also identify any additional enforcement mechanisms that need to be added to the site-led programmes e.g. providing ORC with access to properties to undertake works and recover costs from the occupier (in addition to the powers conferred by section 52 and 53 of the Biosecurity Act 1993). In regard to monitoring, PFD are required to do monitoring as part of our PF2050 Ltd contract and this requires independent verification. Including a similar independent verification requirement into the PRPMP would meet the needs of both PFD and ORC, ensuring the ORC annual operational plan and PRPMP objectives are being met, and also that the PF2050 Ltd contractual objectives are being met.	Council provide for independent monitoring or auditing of plan implementation against objectives, every 2 years (minimum).	Management Methods and Implementation	Reject	See response to submission P289.2. This does not restrict ORC from supporting OPBG and Predator Free Dunedin in meeting contractual obligations with Predator Free 2050 Limited.
P298.9	Predator Free Dunedin	We note that further details of ORC's activities will be set out in a 12-month operational plan (produced in accordance with s100B of the Act), which will be updated and reported on annually. Clarification is sought as to when the first operation plan will be developed by. PFD request public engagement in developing the annual operational plan so that we can assist ORC in ensuring that resources are appropriately allocated.	Clarification is provided around deadlines for the operational plan supporting the RPMP, and opportunity is provided for public engagement on the operational plan.	Management Methods and Implementation	Note	See response to submission P295.9.
P302.4	Feline Rights New Zealand	Our best suggestion when it comes to the inhumane Cat poison PAAP is that the council totally reject the usage of it.	Council refrain from using Predastop or PAPP for pest control.	Management Methods and Implementation	Reject	See response to submission P014.1.
P310.1	Yellow-eyed Penguin Trust	The trust would prefer that the RPMP 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 Darwins barberry in the Catlins over the last twenty years.	Adopt a 5 year review cycle.	Management Methods and Implementation	Reject	ORC's approach to monitoring Plan effectiveness is consistent with other regional councils nationally and the Biosecurity Act 1993 and is set out in Section 7.3 of the Plan. ORC also has the ability to implement Small Scale Management Programmes without a plan review in accordance with the requirements of the Biosecurity Act, may make minor amendment without a full plan review, and can instigate a Plan review at any time if additional pest control programmes are needed.
P310.8	Yellow-eyed Penguin Trust	While supportive of the pest management programmes proposed (exclusion to site-led pest programmes) the Trust urges consideration of terrain features when prioritising and planting 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 pest. 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	For the purposes of pest plant management, prioritise coastal cliff features.	Management Methods and Implementation	Reject	This is an implementation matter that is species dependant, dependant upon the objectives and rules within the Plan, and ORC's yet to be developed plan of action (Page 32 of the Strategy) for the Dunedin site-led programmes.
P311.3	Karen Anderson	Support the use of poison as the least acceptable solution, and facilitate the use of poisons that kill instantly. Extend the existing requirement to obtain a consent to spread poisons into waterways by introducing a requirement to obtain a consent when using broadspectrum poisons to control animal pests on land, written to address a rate or scale of application that will not capture species-specific, site-limited and shortduration use by small land-holders to target a specific pest, but will capture less discriminating wide-scale use across larger areas, particularly as part of a programme intended to include successive re-application. Increase the consent and monitoring requirements in relation to wide-scale larger applications of broad-spectrum poisons that do not kill instantly.	Refine the use of poison as a management method. Require consent to spread poison into waterways. Increase the consent and monitoring requirements in relation to large applications.	Management Methods and Implementation	Reject	See response to submission P014.1.
P321.2	Papatowai Barberry Busters	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. 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.	ORC to provide leadership and coordinate strategies for weed control with property owners, DOC and local councils.	Management Methods and Implementation	Reject	This submission is out of scope and relates to implementation in terms of the establishment of a collaborative pest control programme in Papatowai. The strategy sets out a number of actions to support people and communities with pest control. Additionally, ORC operates an ECO fund which contributes \$250,000 a year to work and projects that support biodiversity and the environment. More information about the ECO fund is available on the ORC website. The Panel agrees that collaboration is important for successful biosecurity management and ORC's approach to working collaboratively with communities and groups is outlined under Action 3.3 of the Strategy. The Panel notes that ORC staff will contact the Papatowai Barberry Busters about how Council can support them with their pest management goals outside the Plan process.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P328.2	Josie Harris	Pests' are animals and when labelled 'pest' have no animal welfare rights due to Nick Smiths 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 & that cause non-target casualties to be excluded form use.	Management Methods and Implementation	Reject	See response to submission P014.1.
P328.5	Josie Harris	I consider that the use of poison in pest control has the potential to negatively affect both the environments subject to receiving them and also on NZ's 'clean green' image. I oppose the use of poisons as they have the potential to adversely affect health of ecosystems & humans.	Exclude the use of poisons where at all possible and look to more environmentally sustainable practices e.g. Trapping bounties on pests etc	Management Methods and Implementation	Reject	See response to submission P014.1.
P328.6	Josie Harris	Staffing - I consider the ORC to be seriously understaffed and as a result can only resort to poisoning as 'the only tool in the box'.	Require a team of people qualified in environmental management who can look more into site specific variables & therefore more targeted pest control using methods that exclude pesticides / insecticides as these are proven to be harmful to both animal and human health / biota health	Management Methods and Implementation	Reject	The Panel considers resourcing to be outside the scope of the Plan review. However, the anticipated annual cost of implementing the Plan is estimated to be \$1,897,000 subject to the long term plan and annual plan processes and this is a doubling of the current expenditure. The use of poisons is only one of many methods to control pests. We further note that there will be a slight increase to the implementation costs to that which was notified given the additions recommended to the Plan.
P328.7	Josie Harris	Section 9.3.2 - The use of various poisons have not been adequately evaluated with respect to public health. The current practice of dropping into catchments & water supplies against manufacturers guidelines is unacceptable and has the potential to affect the health of children and unborn children & therefore public health boards should have to be consulted & should provide actual studies and data to ensure poisoning methods in no way detrimentally affect public health. I consider that the publics enjoyment & recreation eg. dog exercising / tramping etc is also affected and should be considered	Require any contractors to remove dead poisoned carcasses from waterways and bury the dead from catchment areas. All waterways to be avoided where possible. Public health standards to be adequately evaluated & justified.	Management Methods and Implementation	Reject	See response to submission P014.1.
P329.1	Maniototo Pest Management Incorporated	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.	Ensure landowner compliance with the plan obligations.	Management Methods and Implementation	Note	ORC undertakes monitoring of Plan rules and responds to complaints.
P330.3	Donna Suzanne Tomkin	I am against poisoning / suffering of animals. Do not like birds being poisoned - gotten by ferrets - ferrets real pest and rats.	Prohibit the use of poison	Management Methods and Implementation	Reject	See response to submission P014.1.
P332.15	Kāi Tahu ki Otago	This submission relates to existing frameworks and agreements such as: Hikaroroa: An existing Pest Management partnership between Kāti Huirapa Rūnaka ki Puketeraki and DCC, Huriawa: Co-managed/Partnership between Kāti Huirapa Rūnaka ki Puketeraki and DoC and Heritage New Zealand Other existing collaborations: -East Otago Taiāpure and Kāti Huirapa Rūnaka ki Puketeraki currently collaborate with local community preservation restoration groups (waterways and shorelines) -Existing DCC contract in the Waikouaiti forest area for replanting following recent DCC deforestation programme Such agreements currently accommodate to an extent values such as kaitiakitaka and rakatirataka, and recognise our treaty partner status. 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.	All existing rūnaka and community partnerships, collaborations and management agreements currently held with Kā Rūnaka be respected and held independent and 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. the Pest Management Plan as currently constituted.	Management Methods and Implementation	Note	All existing frameworks and agreements are able to be recognised through plan implementation, including through the exemption process outlined in Section 8.3 of the Plan if appropriate, rather than through specific exclusions or amendments to the Plan.
P334.1	Victoria Bonham	Increasing use of chemicals, phosphates and herbicides , habitat loss through urban spread and logging , increased tourism, mismanagement of waste , littering and pollution , and the poisoning of our entire eco system, waterways and soils and absolute devastation to our birds and wildlife by blanketing our environment with such poisons as 1080 - one of the worlds most toxic poisons with NO antidote - and also other poisons such as brodifacoum . These poisons are indiscriminate, inhumane and persist in carcasses , soil and waterways . We are killing the very ecosystem that we all depend on for life. I ask you For the immediate STOP of all poisons used for animal and environmental management. A full and immediate independent review of environmental damage by 1080 and its effects on human and animal health STOP the very human behaviour that is creating the damage.	Stop all use of poisons for animal and environmental management. Provide a full independent review of the environmental damage caused by 1080.	Management Methods and Implementation	Reject	The purpose of the proposed Plan and Strategy is not to recommend specific control methods. The legislative control and use of 1080 is administered by the Environmental Protection Authority.
P334.3	Victoria Bonham	We cannot possibly continue what we are doing and expect a different result. One size is not going to fit all. Extensive monitoring must be done before any plan is actioned and where possible - leave our environment well alone to recover naturally. We must leave some areas completely alone so they can recover Full and regular independent monitoring of our areas must be done before any management plan is actioned and only if required.	Encourage the natural recovery of the environment with extensive monitoring before any implementation of the plan. Only action the plan if it is required.	Management Methods and Implementation	Reject	The species declared pests in the Plan will be monitored in accordance with Section 7 of the Plan. The Panel considers actioning the rules in the Plan is required and the Cost Benefit Analysis undertaken evaluates the costs and benefits of doing so.
P334.4	Victoria Bonham	We must broaden our expertise and conversations by inc bushman , hunters , trappers and fisherman We must encourage eco fur type industries and bounty plans in identified problem areas.	Encourage consultation with bushmen, hunters, trappers and fishermen. Encourage eco fur type industries and bounty plans.	Management Methods and Implementation	Reject	This is an implementation matter and outside the scope of the Plan review. The Panel notes that ORC staff do consult with recreation users on different issues as required and will continue to do so.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P334.5	Victoria Bonham	We must understand nature is a living breathing changing and adapting entity , denying natural change is detrimental to a healthy environment Animal Cruelty in any shape or form is totally unacceptable I ask all elected members to take full responsibility for all consequences of your actions and decisions moving forward - For the health and safety of the communities of Otago , for the health and safety of your own workers dealing with enviro toxins , for the poisoned lands and rivers and for all wildlife and birds that call Otago home.	Embrace natural change and stop animal cruelty. Elected members to take full responsibility for their actions and decisions.	Management Methods and Implementation	Note	Animal cruelty is not supported. See response to submission P014.1.
P340.1	Terry Drayton	Bring back the rabbit board. Employ people to shoot rabbits, earn an income, non toxic approach.	Re-introduce the rabbit board.	Management Methods and Implementation	Reject	The establishment of a pest destruction board is outside the scope of the Plan and the purpose of the proposed Plan and Strategy is not to recommend specific control methods. The Panel notes that Central Government disbanded PDBs in 1989 and are not likely to reinstate when Biosecurity Act legislation provides for pest management options.
P343.2	Quarantine Island Kamau Taurua Community Incorporated	The plan presently relies upon the good will of the landowner to comply and hope that neighbours to areas where control is occurring will undertake action on their property. Council needs to be able to fulfil three roles when seeking to ensure the delivery of the Plan's objectives. Encourage landowners and volunteers to undertake actions, utilise their statutory right to access property and do work, utilise enforcement action.	Encourage landowners and volunteers to undertake actions, utilise their statutory right to access property and do work, utilise enforcement action.	Management Methods and Implementation	Accept	The Panel notes that staff intend to encourage land occupiers and volunteers to undertake pest management activities, and in order to support the Plan a number of the Strategy actions particularly in sections 3.3 and 3.4 of the Strategy, set out how ORC intends to work cooperatively with people. ORC staff investigate all complaints and undertake compliance monitoring and inspections. Where land occupiers do not comply with the Plan rules, enforcement action can be undertaken.
P343.4	Quarantine Island Kamau Taurua Community Incorporated	The RPMP appears to rely heavily on the monitoring completed by Predator Free Dunedin. For site-led approaches we recommend an independent review of the work completed every two years to ensure that the plan is supporting and enabling the achievement of the Predator Free Dunedin goals.	Provide for an independent review of the work completed through site-led programmes every two years to ensure that the plan is supporting and enabling the achievement of the Predator Free Dunedin goals.	Management Methods and Implementation	Reject	An Operational Plan to be reviewed and reported on annually is a requirement of Section 100B of the Biosecurity Act 1993, and will be publicly available. Therefore a separate independent review of the Plans site-led programmes is not considered necessary.
P343.5	Quarantine Island Kamau Taurua Community Incorporated	Funding to community groups is often limited, focused on capital costs and comes with an extensive reporting schedule. We would like Council to consider working with other agencies to streamline the reporting and seek to collaborate on the criteria for awarding funding.	We would like Council to consider working with other agencies to streamline the reporting and seek to collaborate on the criteria for awarding funding.	Management Methods and Implementation	Reject	This is outside the scope of the Plan review. However, ORC's ECO Fund has consistent criteria for applications to the fund.
S016.6	Catherine Brigham	I don't think 2050 Predator Free is achievable. I don't think we can return to a pre-human state. I would hate NZ to become known as a KILLING place. Tourists would avoid NZ.	No specific relief sought.	Management Methods and Implementation	Note	No specific relief requested.
P184.5	Lynne Stewart	Marine Pest Organisms must be listed as pests, including -Kina and Starfish must be listed as pests when their populations explode. Big Fish that kept marine ecosystems in balance have gone and there are huge areas of barren wasteland around our coastlines that have been totally decimated by Kina and Starfish. Their numbers must be limited before we lose more of our Seashore ecosystems including all shellfish and weed getting eaten by Kina and Starfish, our Marine vacuum cleaners. Kina and Starfish, when Listed as Marine Pests in some areas, could be actively managed so numbers were reduced, leaving marine ecosystems balanced. Outcomes when ORC lists explosive populations of Kina and Starfish as Marine Pests, would help ORC achieve it's Biodiversity Strategy vision: "Otago is the proud home of thriving ecosystems and rich biodiversity." People need to be informed about our Native Marine Biodiversity. What we don't know of, we don't know to protect	Add Marine pest organisms (Kina and Starfish) to the lists of pests managed under the Plan.	Marine Pests	Reject	The Panel notes that ORC staff acknowledge and agree that marine biosecurity is a function of regional councils, but like a number of other regional councils nationally, ORC has had limited input into this area to date. It is not recommended to include marine species in the Plan at this time. Prioritising the development of a pathway management plan with other regional councils within the next three years seeks to respond to the threat marine species pose and allows time for ORC to establish a research and surveillance programme and partner with other councils to develop a pathway management plan. As marine pests are spread between areas by vessels, a pathway management plan is an appropriate way to deal with spread, particularly as the risk of spread is not just within regional boundaries, but is between regions. Amendments are recommended to this action in the Strategy so as to set out the scoping work required by ORC and that a regional approach will be undertaken if a national or subnational approach is not pursued.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P276.2	Ministry for Primary Industries	MPI has a leadership role for biosecurity and manages biosecurity risks offshore, at New Zealand's border, and within New Zealand... In our pest management leadership capacity MPI is working with regional councils to build marine pest management capability and ensure regional pest or pathway management plan rules under the Biosecurity Act 1993 are consistent with, and give effect to, the National Policy Direction for Pest Management and any other relevant national regulation. Councils have responsibilities for both species-led management and pathway/vector management. This is set out in Table 4 on page 16-17 of The Pest Management National Plan of Action (2011). At present Otago Harbour has few marine pest species compared to a number of other regions with busy shipping and high recreational vessel usage. For example <i>Sabella spallanzanii</i> (Mediterranean fanworm) is a serious and significant marine pest in the Auckland region and there is always a risk this unwanted organism will be translocated to Otago Harbour via infested vessels (including commercial and recreational vessels). It's important that these potential vectors are managed prior to arrival but also before departure from Otago Harbour. Otago Harbour does, however, already have two notable marine pest species – <i>Undaria pinnatifida</i> ( <i>Undaria</i> , the Asian kelp or <i>Wakame</i> ) and <i>Styela clava</i> (Clubbed tunicate). The latter has increased its range within Otago Harbour dramatically in the past few years and last year, was found on the southern shore of the harbour during MPI's marine high risk surveillance survey. <i>Styela</i> will continue to spread and increasingly become a nuisance fouler, without any form of management in place. Otago Harbour is a departure port for vessels visiting the Sub Antarctic Islands and Fiordland - both pristine environments which we wish to protect from invasive marine species. Concerningly, a vessel sailed from Dunedin to Fiordland in 2017 and was found to have <i>Undaria</i> on it. Vessels sailing to the Sub Antarctic Islands are subject to DOC permit requirements including standards for hull biofouling that must be met. Council pest management rules should be aligned with other regulations, such as those under coastal plans, to ensure the marine pests currently in its region are not spread to new areas. In addition to being a departure point, Otago harbour remains vulnerable to incursions of marine pests via infested commercial and recreational vessels arriving from other locations.	There is, therefore, an opportunity for the Council to take proactive measures to prevent further pest establishment in the harbour as well as to prevent spread from Otago to new areas. MPI is of the view that a number of significant marine pest species should be included in the Otago Regional Council's regional pest management plan (RPMP) so that appropriate actions can be taken if or when required. . A number of significant marine pest species should be included in the Otago Regional Council's regional pest management plan (RPMP) so that appropriate actions can be taken if or when required, including <i>Sabella spallanzanii</i> (Mediterranean fanworm), <i>Undaria pinnatifida</i> ( <i>Undaria</i> , the Asian kelp or <i>Wakame</i> ) and <i>Styela clava</i> (Clubbed tunicate)	Marine Pests	Reject	See response to submission P184.5.
P276.3	Ministry for Primary Industries	The case study of Marine Pests in Otago (in the Biosecurity Strategy) incorrectly states that Clubbed tunicate ( <i>Styela clava</i> ) and Japanese seaweed ( <i>Undaria pinnatifida</i> ) are being managed, however, this is not reflected in the proposed RPMP and we are not aware of any management programmes currently in place (p. 18). The surveys referred to, are the MPI contracted Marine High Risk Site Surveillance Surveys, which are implemented twice-yearly at a number of ports, including in Otago Harbour. MPI has outlined a number of recommendations for exclusion and management of marine pests in our submission, in addition to <i>Styela</i> and <i>Undaria</i> . If Council does not add the Japanese seaweed ( <i>Undaria pinnatifida</i> ) to sustained control, site led or other long term management approach as suggested above, then it should be added to the list of Organisms of Interest (p. 35).	Amend errors in the marine case study on Page 18 of the Strategy. If Council does not add the Japanese seaweed ( <i>Undaria pinnatifida</i> ) to sustained control, site led or other long term management approach as suggested above, then it should be added to the list of Organisms of Interest (p. 35).	Marine Pests	Accept in part	The case study on page 18 of the Strategy is recommended to be amended so that it is accurate. <i>Undaria pinnatifida</i> is already listed as an Organism of Interest.
P276.4	Ministry for Primary Industries	Biosecurity Strategy: MPI notes that Council is interested in developing a Pathway Management Plan for marine Species and will investigate this with other regional councils (p. 12). The Top of the North Marine Biosecurity Partnership, comprising a number of North Island councils and MPI, are currently developing a proposal for an inter-regional pathways management approach. Otago Regional Council may wish to consider working with other South Island councils to develop a coordinated multi-region approach for management of marine pathways.	ORC work with other South Island councils to develop a coordinated multi-region approach for management of marine pathways.	Marine Pests	Accept	This is identified as a key project in Section 4.2 of the Strategy.
P276.6	Ministry for Primary Industries	MPI is of the view that a number of significant marine pest species should be included in the Otago Regional Council's regional pest management plan (RPMP) so that appropriate actions can be taken when required.	ORC add the following marine pests to an Exclusion Programme for Otago Harbour: a. <i>Sabella spallanzanii</i> (Mediterranean fanworm) b. <i>Eudistoma elongatum</i> (Australian droplet tunicate) c. <i>Pyura doppelgangeri</i> (Pyura ascidian) d. <i>Didemnum vexillum</i> (Colonial ascidian) e. <i>Charybdis japonica</i> (Asian Paddle Crab)	Marine Pests	Reject	See response to submission P184.5.
P276.7	Ministry for Primary Industries	MPI is of the view that a number of significant marine pest species should be included in the Otago Regional Council's regional pest management plan (RPMP) so that appropriate actions can be taken when required.	MPI recommend that ORC add the following marine pests, which are already established in Otago Harbour to a sustained control, site led or other long term management approach: a. <i>Styela clava</i> (Clubbed tunicate) b. <i>Undaria pinnatifida</i> ( <i>Undaria</i> , the Asian kelp or <i>Wakaeme</i> ).	Marine Pests	Reject	See response to submission P184.5.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P290.1	Fiordland Marine Guardians	A marine pest pathway plan must be developed with a matter of urgency. It is heartening that the ORC appreciates the value of pathway plans as proactive measures to prevent or reduce the spread of marine pests both within Otago and among regions. In the Biosecurity Plan (page 17), Action 3.1.1 Managing Pathways is to actively advocate for a national marine pathway plan, and/or sub-national plans within 3 years. We agree that a nationally-coordinated pathway approach would likely provide the most efficient solution (as opposed to an Otago Pathway Plan), and we too have been raising this matter with central government and advocating for a nationally-coordinated approach. However, our sense is that a nationally-coordinated approach or national pathway plan is not a government priority at this time. We fear that a focus on national plans will prove fruitless, in which case we are no better off, particularly given the long lead time that would be required to develop such a plan were it to be supported. We strongly encourage the ORC to begin work with the Southland Regional Council to develop a Pathway Plan for the lower South Island. Given the regionally-tailored nature of pathways approaches, much of this work would be transferable to a national plan were one to be supported in the future.	We strongly encourage the ORC to begin work with the Southland Regional Council to develop a Pathway Plan for the lower South Island.	Marine Pests	Note	This is identified as a key project in Section 4.2 of the Strategy and the Panel notes that ORC staff intend to work with other regional councils in the South Island, including Environment Southland.
P290.2	Fiordland Marine Guardians	Increase the status of some marine pests in the Management Plan We note a list of marine pest species listed in Appendix 1 as Organisms of Interest. We encourage the ORC to reconsider increasing the status given to these species, preferably increasing some of them to pest status. We understand that this increased status would then give the ORC powers to prosecute those that spread these species via their vessel, which in lieu of a Pathway Plan would enable the ORC to actively encourage vessel owners to maintain and clean the hulls of their vessels. Of particular concern to us are the Asian paddle crab <i>Charybdis japonica</i> and the Mediterranean fan worm <i>Sabella spallanzanii</i> .	Change Asian paddle Crab and Mediterranean fan worm from 'organisms of interest' to pests animals managed in the Plan.	Marine Pests	Reject	See response to submission P184.5.
P290.3	Fiordland Marine Guardians	It might be helpful to reference the Fiordland Regional Marine Pest Pathways Plan in Section 2.1.2 of the Pest Management Plan.	The Plan is amended to reference the Fiordland Regional Marine Pest Pathways Plan in section 2.1.2	Marine Pests	Accept	An addition is recommended to Section 2.1.2 in the Plan to reference the Fiordland Regional Marine Pest Pathway Plan.
P310.5	Yellow-eyed Penguin Trust	We note the absence of any marine plant or animal pests in the RPMP despite the 660,000 hectares of coastal sea (out to the 12NM mark) administered by the ORC. If these are more appropriately covered under the ORC Coast Plan this should be made clear in the introduction to the RPMP, although we note that currently this plan does not appear to address pests as such.	Clarify the management methods of pests in the CMA.	Marine Pests	Note	See response to submission P184.5.
P332.10	Kāi Tahu ki Otago	Section 8.3 - Power to issue exemptions to plan rules - 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 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. 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: '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' 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. 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 practice and subject to management under tikanga Māori.	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	Marine Pests	Reject	Undaria is not a pest in the Plan so no exemption is required.
P332.7	Kāi Tahu ki Otago	Section 6.3 - Pests to be managed under progressive containment programmes - Currently Undaria pinnatifida (Undaria) is classified under the 'Organisms of interest' table in Appendix 1. 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. This is an 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.	Undaria should be reclassified and declared as a pest organism and subsequently managed under a 'progressive containment' programme.	Marine Pests	Reject	See response to submission P184.5.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P333.2	Environment Southland Regional Council	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 <i>Styela clava</i> , which ES is proposing to exclude from Southland.	Include enforceable rules on marine pests to prevent their movement across the coast.	Marine Pests	Reject	See response to submission P184.5.
P005.1	Dave Holland	The small village of Papatowai is absolutely perfect for site led weed control as it is hemmed in by the Catlins forest park, the sea, farmland, and the Tautuku coastal forest. There has been very limited problems with weeds as most of the properties are holiday homes and as such are not maintained, so people haven't been buying fashionable exotics and planting them in the garden for the last fifty years... The biggest reason that site led plant pest management should be undertaken in Papatowai is that it will be totally successful and will be a WIN in amongst the seemingly impossible task of weed control in New Zealand. Some species of extremely high risk pest plants occur in Papatowai but are currently in low densities, these ought to be dealt with on a site led basis BEFORE they get out of control and end up costing alot of money and time to deal with.	Establish a site led programme at Papatowai.	New Site-led Programmes	Reject	See response to submission P201.8.
P152.9	Rosalie Goldsworthy	Coastal North Otago should be included in all pest management considerations. Dog control regulations should be extended to beaches and other coastal areas	Expand site-led programmes to include North Otago. Include dog control measures.	New Site-led Programmes	Reject	See response to submission P201.8.
P174.8	Helen Clarke	I would like to see further sensitive areas identified for site led control work. In Central Otago and the Upper Clutha area there are important Skink and Gecko areas which could be identified. There are many groups working on these habitats who would well receive support. These habitats are less common nationally and are often specific to Otago and should receive higher priority in the plan.	Additional site-led programmes for Central Otago and Upper Clutha.	New Site-led Programmes	Reject	See response to submission P201.8.
P201.12	Dunedin City Council	However, the DCC notes Predator Free Dunedin has three component areas: Otago Peninsula, West Harbour–Mt. Cargill and the Urban Link. The DCC recommends the proposed RPMP be amended to include the Dunedin Urban Link in the site-led projects (effectively joining the West Harbour-Mt. Cargill and Otago Peninsula sites). The DCC recommends a column for the Urban Link be added to Table 24 (at pages 6364). The DCC recommends the Urban Link column replicates the West Harbour-Mt. Cargill column. In other words, all pests managed in the West Harbour-Mt. Cargill site should also be managed in the Urban Link site. The DCC recognises the ability for the ORC to enforce pest management responsibilities as an advantage of site-led programmes.	Include the 'Dunedin Urban Link' in the site-led projects.	New Site-led Programmes	Reject	See response to submission P201.8.
P201.8	Dunedin City Council	The DCC recommends the ORC consider adding the following other pest plant species to Table 2 (at 4.1): ivy – site-led; boxthorn – site led/progressive containment (coastal and limestone areas); and cotoneaster (all species) – site-led. Appendix 1 of the proposed Biosecurity Strategy should be amended to reflect any changes to 4.1 of the RPMP.	Add Ivy, Boxthorn and Cotoneaster as site led pest plant species in the Plan.	New Site-led Programmes	Reject	More information would be needed in accordance with the National Policy Direction 2015 and the Appendix 2 Guidance in the Strategy to assess new site-led programmes. The purpose of the site-led programmes is not for ORC to solely undertake pest management works, but that ORC supports land occupiers to manage species that impact on important values that require protecting in a specific area, that this is able to be resourced for its duration, and that ORCs role and the role of others in this is clear. The information required in Appendix 2 is information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements. Therefore it is not recommended to include a site-led programme at this time, but that ORC consider such proposals where these have been developed in accordance with the National Policy Direction 2015 and Biosecurity Strategy Appendix 2 Criteria. The Panel notes that ORC staff can also support groups and communities in other ways without the need for regulation in the Plan.
P213.1	Diana Noonan	I wish to see monitoring and eradication work undertaken on Darwin's Barberry in the Catlins. It is a highly invasive species, and many hours of local volunteer work in my village and its surrounding area had impacted significantly on the reduction of the plant. I would like to see the Management Plan address further work on this pest in my area at an official and professional level.	Add Darwin's Barberry for eradication in the Catlins area.	New Site-led Programmes	Reject	See response to submission P201.8.
P213.2	Diana Noonan	I am a citizen scientist working on bat research in my area. I would like to see the Management plan address the issue of predator control in areas of bat habitat, especially in the Tahakopa and Owaka Valleys.	Address bat habitat predators in the Tahakopa and Owaka Valleys.	New Site-led Programmes	Reject	See response to submission P201.8.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P217.14	Predator Free NZ Trust	6.5.8 Adding new site-led programmes to the Plan. It is important that there are means for new sites to be added to protect sites that the council, community groups or individuals view as important. It is important that council encourage people to do this and support their efforts to protect sites with ecological importance. Council should endeavour to them make the process as easy as possible. We encourage council to support the establishment of new site-led programmes.	Council ensure there is provision for the addition of further site-led programmes.	New Site-led Programmes	Accept	Site-led programmes are a new approach introduced through recent changes to the Biosecurity Act 1993 and through the National Policy Direction 2015. To ensure additional site-led programmes can be established without the need for a full plan review, ORC have developed criteria which the Council can use to assess whether additional site-led programmes may be added to the Plan over time. These criteria are referenced in Section 6.5.8 of the Plan and are set out in Appendix 2 in the Strategy.
P218.3	Open Valley Urban Ecosanctuary - Open VUE	Open VUE supports the proposal of ORC taking a lead role in supporting community groups and agencies to bring about the desired level of environmental protection in the West Harbour site-led project (Objectives 6.5.5.a and 6.5.5.b). We would like to see this support extended to Open VUE as North East Valley is the urban interface of the West Harbour site-led project and pest control work and community education in the Valley will complement and enhance the pest work undertaken in the West Harbour project. Education work undertaken by Open VUE will bolster the social license required for pest control, particularly feral cats and hedgehogs, which many urban people currently view more positively than rural communities do.	Extend the West-Harbour site-led programme to include the Open Valley Urban Ecosanctuary Project area.	New Site-led Programmes	Reject	See response to submission P201.8.
P220.2	Lenz Reserve Committee, Tautuka (Forest and bird Society)	With respect to site-led programmes we believe that the type of comprehensive coverage being afforded the Otago Peninsular should be extended to progressively encompass other areas. The committee particularly points to the need for more intense control of Darwin's barberry and feral deer and pigs in the Tahakopa, Fleming and Tautuku catchments in The Catlins.	Extend the coverage of site led areas, in particular to catchments in the Tahakopa, Fleming and Tautuku catchments in The Catlins to manage feral pigs, deer and Darwin's Barberry.	New Site-led Programmes	Reject	See response to submission P201.8.
P221.2	Papatowai Forest Heritage Trust	The outlined eradication, containment and control requirements are satisfactory, but we would like to see The Catlins, particularly the Papatowai environs (extending to the Tahakopa, Fleming and Tautuku Rivers) become a site-led area. The varied biodiversity of this area is well recognised and endangered species of bats, penguins, birds, fish insects and reptiles all make this their home. The flora is also rich in biodiversity with again many endangered and rare plant species found here. We recommend that this area has its own site led comprehensive programme developed. This would be beneficial in enhancing the animal pest control (feral deer, pigs, as well as mustelid pests, rats and possums and increasing numbers of feral cats) as well as broadening the attack on invasive plants (specifically Darwins barberry and Chilean flame creeper). Thank you for the opportunity to submit.	Extend the coverage of site led areas to the Papatowai environs in the Catlins (extending to the Tahakopa, Fleming and Tautuku catchment) including the development of its own site led comprehensive programme enhancing animal pest control as well as broadening the attack on invasive plants.	New Site-led Programmes	Reject	See response to submission P201.8.
P240.1	Reuben Morison	Darwins Barberry is an issue throughout Otago, particularly in the Catlins from the Catlins Lake south around Papatowai. Most native bush around the area and a considerable amount of farmland is inundated with Barberry. The concentration can be far far higher than the concentration on Signal Hill ( the worst patch in Dunedin) and some trees are up to 60 years old. We have put hundreds of hours of work in, and only got a low level of control over a small area. See my map below for most Barberry I've been monitoring in Otago, but there is a lot more than I have marked. We have only focused so far on the Papatowai village as it is a small enough area that we can manage with a small team. However with no funding, and only limited supplies from DOC we can't make much more of an impact without some ORC support. The area that the barberry is infesting is previously untouched or regenerating native bush, and is arguably higher priority than the peninsula. Map: <a href="https://drive.google.com/open?id=1g1Ejc4uNRhyHB-vcEffhgOitTI&amp;usp=sharing">https://drive.google.com/open?id=1g1Ejc4uNRhyHB-vcEffhgOitTI&amp;usp=sharing</a>	Request that ORC support the management of Darwin's barberry in Papatowai, The Catlins.	New Site-led Programmes	Reject	See response to submission P201.8.
P258.20	Sue Maturin	Section 6.5 – Site lead programmes: Forest and Bird supports the inclusion of site-led programs for Otago Peninsula and the West Harbour – Mt Cargill and Quarantine and Goat Island areas and observes that in order for these to be effective it would be valuable to incorporate the Dunedin Urban Link into Table 24. This would help provide important buffering for the two large rural projects.	Council incorporate the 'Dunedin Urban Link' into the site-led programmes.	New Site-led Programmes	Reject	See response to submission P201.8.
P258.4	Forest and Bird	Forest and Bird supports the site-led programmes and would like to see more, especially outside of Dunedin, in Central Otago – Lindis area and in the Catlins. We commend the Council's proposal to help other site led programs to get established and support the criteria listed in the proposed Biosecurity Strategy – however we consider ORC needs to be more proactive and go out and seek community support for establishing site-led programmes where they are most needed, rather than wait for communities to come to the ORC.	Council should proactively identify further site-led programmes, particularly in the Central Otago - Lindis areas and in the Catlins.	New Site-led Programmes	Note	The submitter's request for ORC to be more proactive in the establishment of site-led programmes is noted. This is a new approach introduced through recent changes to the Biosecurity Act 1993 and through the National Policy Direction 2015. To ensure additional site-led programmes can be established without the need for a full plan review, ORC have developed criteria which the Council can use to assess whether additional site-led programmes may be added to the Plan over time. These criteria are referenced in Section 6.5.8 of the Plan and are set out in Appendix 2 in the Strategy.
P263.22	Queenstown Lakes District Council	The QLDC supports the work of the Wakatipu Wildlife Trust carried out in the Queenstown Lakes district. We would like to signal that this work may lead to proposing a further site-led programme in the near future.	No specific relief sought.	New Site-led Programmes	Note	The QLDC's submission that a further site-led programme may be proposed in the future is noted.
P264.4	Papatowai & District Community Association	While site-led programmes are laudable, control efforts must be broadened. The remote, unspoiled native forest of the Catlins is as deserving as the Otago Peninsula. 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.	We recommend that the list of target pests is consistent across the region.	New Site-led Programmes	Reject	The purpose of the site-led programmes is for ORC to support land occupiers to manage species that impact on important values that require protecting in a specific area. The Panel notes this does not restrict ORC staff from providing support to communities managing these species in other areas.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P266.12	Jan Kelly	Site-led programmes: The Lindis Valley river and dry upland system surrounding it is a contained unit of landscape, and with its pest problems, should properly be treated as a special case where pest control is feasible.	ORC to name the Lindis Valley river, and the dry upland system of its catchment, for Site-led treatment, for both animal and plant pests.	New Site-led Programmes	Reject	See response to submission P201.8.
P266.15	Lindis Pass Conservation Group Inc	6.5.2. site-led programmes. Mustelids (ferret, stoat, weasel), Rat, Possum: Mustelids and rats are a constant source of predation for reptiles, spiders, beetles, worms, and nesting birds. Possums predate eggs; and they spread brier across the high country through eating its fruit and widely defecating its viable seeds.	ORC to include mustelids, rats, and possums in a "Site-Led Pest Programme" for Sustained Containment in the Lindis catchment, targeting these pests in a long-term and consistent manner.	New Site-led Programmes	Reject	See response to submission P201.8.
P289.7	Director General of Conservation	I support the Council's inclusion of site-led programmes for Otago Peninsula, Western Harbour-Mt Cargill, and Kamau Taurua/Quarantine island and Rakiriri/Goat Islands in the RPMP as part of PFD. PFD has three component areas: West Harbour-Mt Cargill, Otago Peninsula and the Urban Link. I recommend that the proposed RPMP be amended to include the Dunedin Urban Link in the site-led projects in section 6.5.2 (p 62). The Department recommends that an Urban Link column be added to Table 24 (p 63-64) and that it replicates the requirements for West Harbour and Otago Peninsula thereby reflecting the values in the other two zones, eliminating a refuge for pests and weeds, and enabling a pathway for biodiversity.	Support for site-led programmes, addition of PFD's Urban Link to site-led programmes.	New Site-led Programmes	Reject	See response to submission P201.8. It is also noted that Predator Free Dunedin have not requested in their submission that the Dunedin Urban Link project be added as a site-led programme.
P293.4	Otago Peninsula Biodiversity Group	Table 24 (page 69): OPBG support the three identified site-led programmes. These three site-led programmes will collaborate as part of the Predator Free Dunedin (PFD) Initiative. The ORC may want to consider including the Urban Linkage as additional site-led programme in the near future to ensure PFD will succeed. Given the close geographic proximity of the three current site-led programmes (Otago Peninsula, Quarantine & Goat Islands, West Harbour) pests can easily disperse across boundaries. Thus, it is essential for successful pest control to identify and target the same pest species across all three sites.	Support the three site-led programmes and request the addition of the Dunedin Urban linkage to site-led programmes.	New Site-led Programmes	Reject	See response to submission P201.8.
P295.7	Landscape Connections Trust Halo Project	We recognise the role of the Dunedin Urban Linkage area, and recommend that in the future it may be included under an additional site-led programme in recognition of public interest and participation in pest control activities in this area, and to ensure buffer zones are maintained around existing site-led programmes on the Otago Peninsula and West Harbour-Mt.Cargill	The Dunedin Urban Linkage area is monitored for consideration as an additional site-led programme in the future.	New Site-led Programmes	Note	See response to submission P201.8. The project can be monitored for future consideration as a site-led programme. However, it is noted that site-led programmes should have important values that require protecting, such as significant vegetation or outstanding natural character features and landscape. ORC is able to support the Dunedin Urban Linkage without regulating this in the Plan.
P296.7	Morgan Foundation	It is important that there are means for new sites to be added to protect sites that the council, community groups or individuals view as important. It is important that council encourage people to do this and support their efforts to protect sites with ecological importance. Council should endeavour to them make the process as easy as possible. We encourage council to support the establishment of new site-led programmes as driven by community or protection of significant ecological sites.	Allow establishment of new site-led programmes as required by community	New Site-led Programmes	Accept	Site-led programmes are a new approach introduced through recent changes to the Biosecurity Act 1993 and through the National Policy Direction 2015. To ensure additional site-led programmes can be established without the need for a full plan review, ORC have developed criteria which the Council can use to assess whether additional site-led programmes may be added to the Plan over time. These criteria are referenced in Section 6.5.8 of the Plan and are set out in Appendix 2 in the Strategy.
P297.5	Forest & Bird - Tautuku Restoration Project	Additionally feral deer and feral pigs should be included in the list for site led pests as there are sites within Otago with recognised significant (special) biodiversity values where these two species are causing significant damage to native flora and waterways. An example is the last remaining sizeable area of lowland coastal mixed native forest found on the Eastern south Island in the Tahakopa/Fleming/Tautuku area of the Catlins in South Otago (See below other comments in regards to including this area in the site-led programmes). I suggest that the lowland native forest and surrounding agricultural land in the Tahakopa/Fleming/Tautuku region be included in the site-led programmes. This site represents the last remaining native lowland forest on the east coast of the South Island and is recognised for its high biodiversity value, supporting a range of threatened species. Effective control of the listed pest species needs to be conducted across a large area to ensure it is effective.	Establish a site-led programme in the Tahakopa, Fleming and Tautuku catchments in The Catlins to control the listed pest species.	New Site-led Programmes	Reject	See response to submission P201.8.
P298.7	Predator Free Dunedin	In the future, the Dunedin Urban Linkage area may also be included under an additional site-led programme in recognition of public interest and participation in pest control activities in this area, and to ensure buffer zones are maintained around existing site-led programmes.	The Dunedin Urban Linkage area is monitored for consideration as an additional site-led programme in the future.	New Site-led Programmes	Note	See response to submission P201.8. The project can be monitored for future consideration as a site-led programme. However, it is noted that site-led programmes should have important values that require protecting such as significant vegetation or outstanding natural character features and landscape. ORC is able to support the Dunedin Urban Linkage without regulating this in the Plan.
P310.9	Yellow-eyed Penguin Trust	The Trust supports the identified site-led programmes, in particular 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, conservation of a significant oceanic headland and a large (6000ha plus) forest basin. We ask that the RPMP identify a process whereby other site-led programmes can be established in the future.	Identify a process whereby other site-led programmes can be established in the future.	New Site-led Programmes	Accept	Site-led programmes are a new approach introduced through recent changes to the Biosecurity Act 1993 and through the National Policy Direction 2015. To ensure additional site-led programmes can be established without the need for a full plan review ORC have developed criteria which the Council can use to assess whether additional site-led programmes may be added to the Plan over time. These criteria are referenced in Section 6.5.8 of the Plan and are set out in Appendix 2 in the Strategy.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P317.1	Katrina Sharples	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.	Extend the coverage of site led areas, in particular to The Catlins to manage Darwin's Barberry.	New Site-led Programmes	Reject	See response to submission P201.8.
P320.9	Bruce Jefferies	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	Include provisions for wider predator control in Lake Wakatipu and Wanaka catchments	New Site-led Programmes	Reject	See response to submission P201.8.
P321.2	Papatowai Barberry Busters	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. 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. 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.	We do not support the concept of "site-led" programmes if similar infestations in other areas of the region are neglected.	New Site-led Programmes	Accept	Site-led programmes are a new approach introduced through recent changes to the Biosecurity Act 1993 and through the National Policy Direction 2015. To ensure additional site-led programmes can be established without the need for a full plan review ORC have developed criteria which the Council can use to assess whether additional site-led programmes may be added to the Plan over time. These criteria are referenced in Section 6.5.8 of the Plan and are set out in Appendix 2 in the Strategy.
P325.1	Peter Dowden	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.	Extend coverage of site-led Sycamore management to include Manuka Gorge	New Site-led Programmes	Reject	See response to submission P201.8.
P335.42	Barrie Wills	In relation to [Plan Objective 6.5.7] No mention of Clutha River, Didiysmophenia (Rock snot) and Lindavia (Lake snow) do not get a mention. Objective C: Lagarosiphon has already been found in Lake Wakatipu, so the objective must be to prevent RE-establishment.	Consider adding Didymo and Lindavia to site-led programmes at the Clutha River.	New Site-led Programmes	Reject	See response to submission P201.8.
P343.3	Quarantine Island Kamau Taurua Community Incorporated	The Council's biodiversity action plan has a strong emphasis on supporting the community to undertake conservation action. Presently the RPMP incorporates site-led approaches where community is the driving force behind predator control. To help identify and develop further site-led projects Council will need to take steps to assist community to have this vision and seek inclusion of their site to the RPMP.	To help identify and develop further site-led projects Council will need to take steps to assist community to have this vision and seek inclusion of their site to the RPMP.	New site-led programmes	Note	The purpose of the site-led programmes is for ORC to support land occupiers to manage species that impact on important values that require protecting in a specific area, that this is able to be resourced for its duration, and that ORC's role and the role of others in this is clear. ORC can consider such proposals where these have been developed in accordance with the National Policy Direction 2015 and the guidance in the Biosecurity Strategy Appendix 2 Criteria. The Panel notes that ORC staff can also support groups and communities in other ways without the need for regulation in the Plan.
S013.11	Kāi Tahu ki Otago	Chapter 3.4 - landscape scale and site scale: Target key areas for collaborative and coordinated control (p.23) - Huriawa is missing – this is a significant social, environmental and cultural site for us. Waikouaiti river is also a key landscape for us. Hikaroroa is our maunga tipuna. These three significant sites form part of ki uta ki tai - our landscape and coastal management strategy. We would like these three key landscape sites added to the programme. We are currently carrying out extensive regeneration, revitalisation and preservation actions with these three sites and in collaboration with key agencies and community groups. Future activities may need funding and support under the ORC Biosecurity Plans to meet the conditions of the Plan and we would not like to find we are excluded from this opportunity because our sites of bioheritage significance are not recognised in the ORC Biosecurity Strategy or Pest Management Plan.	Kati Huirapa Rūnaka ki Puketeraki submit that their ancestral landscapes or Huriawa Peninsula, The Waikouaiti River and Hikaroroa/Mt Watkin be added to the site led programme as referenced in the pest management plan and the biodiversity strategy.	New Site-led Programmes	Reject	See response to submission P201.8. However, it is not clear whether Kati Huirapa ki Puketeraki are seeking a new site-led programme in the Plan or a non-regulatory site-led or landscape scale approach. The Panel notes that as no additional information or clarification was provided by Kāi tahu through the hearing process that the submission is therefore rejected.
S013.12	Kāi Tahu ki Otago	Chapter 3.4 - landscape scale and site scale: Target key areas for collaborative and coordinated control (p.23) - The Katiki and Moeraki peninsula is a significant ancestral landscape containing the historic Katiki Point Lighthouse, Te Raka a Hineatea Pa site, yellow-eyed penguins, and fur seals amongst other marine wildlife. This landscape would benefit from an integrated site led programme of works and the associated support networks.	Te Rūnanga o Moeraki submit that the Kātiki and Moeraki peninsula should be considered for addition to the site led programme as referenced in the pest management plan and the biodiversity strategy.	New Site-led Programmes	Reject	See response to submission P201.8. However, it is not clear whether Te Rūnanga o Moeraki are seeking a new site-led programme in the Plan or a non-regulatory site-led or landscape scale approach. The Panel notes that as no additional information or clarification was provided by Kāi tahu through the hearing process that the submission is therefore rejected.
S013.13	Kāi Tahu ki Otago	Chapter 3.4 – Action 3.4.1 Provide regional leadership and support for the site-led programmes in the Pest Management Plan to protect indigenous biodiversity (p.26) - Inclusion of the Huriawa Peninsula, The Waikouaiti River and Hikaroroa/Mt Watkin ancestral landscapes within the programme would provide enhanced opportunities to access regional advocacy and support networks to enhance and protect these areas. The integrated and structured management of these ancestral landscapes aligns with the landscape and coastal management strategies of Kati Huirapa: embodied by the phrase 'Ki Uta Ki Tai'.	Kati Huirapa ki Puketeraki request the addition of our significant ancestral landscapes of Huriawa, Waikouaiti River and Hikaroroa as additional areas subject to a strategic 'whole of site' approach.	New Site-led Programmes	Reject	See response to submission S013.12.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
S013.14	Kāi Tahu ki Otago	Chapter 3.4 – Action 3.4.1 Provide regional leadership and support for the site-led programmes in the Pest Management Plan to protect indigenous biodiversity (p.26) - Inclusion of the Kātiki and Moeraki peninsula ancestral landscape within the programme would provide enhanced opportunities to access regional advocacy and support networks to enhance and protect these areas	Te Rūnanga o Moeraki submit that the Kātiki and Moeraki peninsula should be considered for addition to the site led programme and therefore be subject to a strategic 'whole of site' approach.	New Site-led Programmes	Reject	See response to submission S013.12.
P116.2	Ngaere Moss	Trouble with possums eating vegetables. Have from time to time trapped some but need some assistance in the removal of carcasses.	Banish possums for good.	Possums	Reject	Possums are widespread nationally and the total eradication of Possums in Otago is not considered feasible within the term of this Plan.
P126.2	Logan Cowdell	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	The Panel consider a non-regulatory programme is preferable to a regulatory approach (which would include occupier control rules) in the Plan at this stage. The development of a voluntary landowner-led possum control programme, starting with the Dunedin site-led areas, is intended to be developed within the first 18 months of the implementation of the Strategy and Plan. This will be a pilot project for ORC, and ORC intends to work with OSPRI, landowners, Predator Free Dunedin and other regional councils in the development of the programme. In the future, this may lead to further changes to the Plan to introduce occupier control provisions where landowners have signed up to the programme. Exactly how this will work, what the objectives will be, and what any rules will be will require careful consideration at that time. The programme would need to meet the requirements in the Act for a minor amendment to the Plan, or will require a full plan change (complete with an assessment in accordance with the National Policy Direction 2015 and a Cost Benefit Analysis). Therefore, this submission is recommended to be rejected. However, the Panel notes that ORC staff intend to commence work as set out in the Strategy as a matter of priority.
P128.2	Rebecca Bell	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P130.2	Rafferty Parker	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P132.2	Jesse Keable	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P133.2	Monika Divers-Sidor	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P135.2	Noeline Bourke	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 not 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.	Opposes the addition of Possums to the Plan.	Possums	Reject	Possums have adverse effects on the environment and these effects are outlined in Table 24 in the Plan.
P136.2	Marty Roberts	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P137.2	Dell McLeod	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P138.2	Jennifer Thomas	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P139.2	Davina Hopgood	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.	Add Possums to the animals managed under the sustained control programme. [it is noted that this is likely submitted in error - see submission points 139.5-8].	Possums	Reject	See response to submission P126.2.
P140.2	Just Doi	I do not believe that possums are a TB vector and as a vegetarian they have minimal impact on our wildlife.	No specific relief sought.	Possums	Reject	Possums have adverse effects on the environment and these effects are outlined in Table 24 in the Plan.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P141.2	Josh Norton	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P142.2	Craig Freeman	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P143.2	Anna Clark	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. Where sustained possum management plans are established, I would like to see a more combined species control programme. Invasive species in NZ appear to have indirect effects on each other (investigate 'meso-predator suppression'). This means that managing just one pest species in a particular management unit may lift the competitive suppression on another pest species. I propose a management system that takes into account the dynamic relationships between the species as opposed to systems which manages each species entirely independently.	Add Possums to the animals managed under the sustained control programme. Ensure plan takes a 'combined species control' approach to management of pests.	Possums	Reject	See response to submission P126.2.
P144.2	Jared Oliver	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P145.2	Debbie Munro	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. One would of thought you would already doing this. What are you doing? Nothing? While the rest of NZ is trying to kill possums off your sitting there thinking about it. A bit dumb I think.	Add Possums to the animals managed under the sustained control programme. Ensure plan takes a 'combined species control' approach to management of pests.	Possums	Reject	See response to submission P126.2.
P146.2	Karin Johnsson	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P148.2	Rusty Knight	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P149.2	Matthew Peppercorn	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P151.2	Martin Broadbent	In the coming years as OSPRI withdraws their possum control from areas, where TB has been removed, ORC will not need to have its own plan for possum control. Possums don't have a huge impact on our native flora and fauna so no control is necessary for both biodiversity reasons or as well as vectors for TB. I would not like to see the addition of possums to the list of pests to be managed under sustained control programmes. Or for the ORC to have a plan for possum control across the region. The plan should not include objectives such as Residual Trap Catches (RTCs) and rules for land occupier responsibility. Possum control across the region doesn't need a plan similar to that used for rabbits. I suggest the Council DOES NOT add possums to animals to be managed under sustained control programmes. No appropriate objectives or rules also need to be included.	Opposes the sustained control of possums in the Plan.	Possums	Reject	See response to submission P126.2.
P152.2	Rosalie Goldsworthy	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P153.2	Fiona Peoples	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P154.2	Sarah McArthur	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P155.2	Jo Standley	Possum control should continue.	Support for the management of possums as a pest.	Possums	Accept	The submitter supports the inclusion of possums in the Plan.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P157.2	Dylan Robertson	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P158.2	Lucy Bell	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P159.2	Elm Wildlife Tours	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P160.2	Fiona Peat	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P161.2	Bonnie Wilkins	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P183.3	Routeburn Dart Wildlife Trust	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P185.2	Nicola Richards	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P189.3	Diana Stiven	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P201.13	Dunedin City Council	The DCC recommends the proposed RPMP include occupier control responsibilities for possums on the Otago Peninsula. The current Otago Peninsula Biodiversity Group (OPBG) possum control operation is not fully successful, partly because some landholders do not participate. The 'eradicate possums' objective in plan objective 6.5.4a (page 73) cannot be achieved without the participation of all landholders. OPBG, ORC, DCC, the Yellow-eyed Penguin Trust and private landholders have all committed significant resources to possum control on the Otago Peninsula and will continue to do so. Occupier control responsibilities relating to possums and the ability to enforce those responsibilities are necessary to avoid a situation where a few individual landholders are able to jeopardise the plan objectives.	The DCC recommends the proposed RPMP include occupier control responsibilities for possums on the Otago Peninsula.	Possums	Note	Rule 6.5.4.1 requires that 'No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Otago Peninsula (identified on Map 3 in Appendix 3) any... g) possum. A breach of this rule creates an offence under section 154N(19) of the Act'. Therefore if land occupiers harbour possums, ORC is able to take enforcement action as necessary.
P211.3	John Parker	Objective 6.5.4. b I support b)eradicate possums. Having been controlling possums on my property for 25 years, with an average of 40 possums per year, there has been a substantial decrease in possums since the OPBG began possum control operations in 2010. In my view the huge community effort that is going towards possum control on the Peninsula makes eradication achievable. Neighbours comment on the increase in the number of bellbirds and tui and there are increasing reports of kereru being observed more widely. In my view this is a consequence of fewer possums. However, I am very concerned that the proposed plan does not include rules to ensure full landowner compliance to ensure objectives are met. Successful possum eradication on the Peninsula relies on 100% co-operation from all landowners. A single uncooperative landowner with only a small block, will prevent the achievement of an extra-ordinary goal – possum eradication from 9,400ha on the New Zealand mainland. This is where the ORC has the ability to make or break years of voluntary work by OPBG and the rest of community. Since 2008 OPBG has raised well over \$1million to finance this work. No landowners have been asked to pay for possum control on their property, and 99% are very willing to provide access with many actively contributing to the control work. The decision I would like the council to make is to include a mechanism, to act as a last resort where a landowner does not allow access. Enforcement should be a last resort, but the provision needs to be included in the pest management plan.	The decision I would like the council to make is to include a mechanism, to act as a last resort where a landowner does not allow access. Enforcement should be a last resort, but the provision needs to be included in the pest management plan.	Possums	Accept	Rule 6.5.4.1 requires that 'No person shall keep, hold, enclose or otherwise harbour in any place, either in transit to or present on the Otago Peninsula (identified on Map 3 in Appendix 3) any... g) possum. A breach of this rule creates an offence under section 154N(19) of the Act'. Therefore if land occupiers harbour possums, ORC is able to take enforcement action as necessary.
P217.4	Predator Free NZ Trust	In the coming years as OSPRI withdraws from areas, where TB has been removed, councils need to step up and have a plan for possum control in their region. Possums have a huge impact on our native flora and fauna and so their control is necessary for both biodiversity reasons as well as vectors for Tb. We would like to see the addition of possums to animals to be managed under sustained control programmes. We also recommend the ORC have a plan for possum control across the region as OSPRI's involvement reduces. This should include objectives such as Residual Trap Catches and rules for land occupier responsibility. It should also include good neighbour rules, council control/inspection, advocacy and education. Possum control across the region needs a plan similar to rabbits. It would be worth reviewing what has been done in other regions to ensure ongoing possum control. We suggest council adds possums to animals to be managed under sustained control programmes. Appropriate objectives and rules also need to be included.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P217.7	Predator Free NZ Trust	Possums are an important pest to include in the plan. They are important from both their impacts on primary production pest and biodiversity. Whilst our preference is that they are included as a pest for sustained control at a minimum they should be included as site led pests. We suggest council, at a minimum, includes possums as a site led pest.	Include possums in the proposed site-led programmes.	Possums	Accept	Possums are identified as a pest in the Dunedin site-led areas.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P223.2	Grant Lester	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P224.2	Alan Roberts	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P225.2	Grant Crawford	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P231.2	Keith Marshall	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P237.2	Mary Pearson	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P258.17	Sue Maturin	Forest and Bird considers that possums also need to be dealt with at a regional rather than site specific level, and should have a similar status and rules as rabbits.	Possums are added to the Regional Pest list, rather than being listed only as site-led.	Possums	Reject	See response to submission P126.2.
P267.5	Arrowtown Village Association	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 and so their control is necessary for both biodiversity reasons as well as vectors for TB. We 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.	Add possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P268.4	Fiona Rowley	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 and 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.	Add possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.

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P282.5	Duncan Keenan	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 and 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.	Add possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P283.5	Wakatipu Reforestation Trust	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 and so their control is necessary for both biodiversity reasons as well as vectors for TB. We 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P293.3	Otago Peninsula Biodiversity Group	Point 6.4 (page 55): OPBG encourages the ORC to be more ambitious with their targets and include possums as a pest in sustained control programmes across the region.	Sustained control of possums	Possums	Reject	See response to submission P126.2.
P297.2	Forest & Bird - Tautuku Restoration Project	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 and so their control is necessary for both biodiversity reasons as well as vectors for TB. The area of native lowland forest with the Tautuku Restoration Project area has received regular possum control through OSPRI for TB control. This is due to stop in the near future due to the success of eradicating TB in the Catlins. As a result of the OSPRI operations, possum numbers were controlled over a large area of native forest, with these due to end it is essential that possums continue to be a priority species for sustained control to avoid the extensive damage to New Zealand's native flora and fauna which result from this species. 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P298.14	Predator Free Dunedin	PFD believe that we should be aiming for sustained control of possums across the region, which will be particularly important as OSPRI's TB-free possum knockdown programme begins to abate. Similar controls as those proposed for rabbits may be appropriate.	Possums are included as pest animals for 'sustained control'.	Possums	Reject	See response to submission P126.2.
P300.3	Ruth-Ann Anderson	The Plan should also include control of possums outside site- led locations. As funding from other sources decreases the threat of possum to our native biodiversity increases. Perhaps Sustained Control?	Extend control of possums beyond site led locations	Possums	Reject	See response to submission P126.2.
P308.2	Kevin Voges	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P313.5	Carrie Pritchard	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 and 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.	Add possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P315.5	Andrew Davis	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.

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P318.5	Ben Teele	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P320.2	Bruce Jefferies	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P324.2	Aspiring Biodiversity Trust	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 and 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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P337.2	Marion Mertens	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.	Add Possums to the animals managed under the sustained control programme.	Possums	Reject	See response to submission P126.2.
P338.6	Kawarau Station Limited	Possums - have been controlled by ANIMAL HEALTH for a number of years, as they use this area as a buffer, although we don't always agree with their policy.	No specific relief requested.	Possums	Note	No specific relief is requested. The submitter's information regarding possum control in this area is noted.
S002.1	Richard Hewitt	In my area the use of poison for the destruction of possums appears to be a failure. In a twelve week period - August, September and October of this year I have destroyed 32 possums on my wife's 2.6ha property at 63 Nook Road Lake Hawea, by using a toy dog as a finder and a rifle. I consider that if the number that the toy dog and I can kill on a property of this size then the numbers on the adjacent runs must be humungous. A correspondent to the Otago Daily Times has written on more than one occasion that there is little or no sign of possums in these ranges. He is either semi blind or trying to deceive. It indicates to me that the laying of poison and trapping is taking the easy way and is not working effectively. A return to the rabbit board method of using dogs and guns is called for as well at regular intervals. Then a better indication of possum numbers in areas would be able to be ascertained and dealt to. A bounty [ as used for the destruction of kea in the past] could be paid as an incentive to the paid hunters. I suggest that these animals travel down the valley/s in the winter to escape the cold and that the paid hunters would then be able to deal to them whilst they were concentrated in a smaller area and in number.	use a rabbit board approach with dogs and guns to control possums and pay a bounty to people to destroy possums.	Possums	Reject	See response to submission P126.2.
S012.2	Federated Farmers of New Zealand	5.We are disappointed to see that possum control is only site led around Dunedin city, and that the rest of Otago will have a volunteer-initiated programme. Lessons do not appear to have been learnt from the failed OSPRI Locally Initiated Programme (LIP) run in the early 2000s. Landholders were given traps or poison in Tb infected areas. Possum control worked for a while but ultimately possum control lapsed as landholders got on with the business of farming.	Making possum control the sole responsibility of landholders will not be successful. Landholders have already reduced possum numbers by funding the work of OSPRI through slaughter levies and the Otago Land Levy. ORC should take advantage of current low possum numbers and adequately fund possum control throughout the region.	Possums	Reject	No region wide occupier rules are proposed in the Plan to control possums. However, the management of pests on private land is primarily a land occupier responsibility. It is noted however that an expanded possum control programme will be the subject of a plan review at a later stage.
P338.2	Kawarau Station Limited	30/01/2017 - 05/01/2018 \$26,000 for ground control by gun, dog and gas - 4,500 known kills. Helicopter control, 811 Rabbits killed.	No specific relief requested.	Rabbits	Note	No specific relief is requested. The Panel notes that the submitter's information regarding control on their property provides useful information to assist ORC staff in understanding the species being controlled by land occupiers.



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P219.1	Aalbert Rebergen	The rook is one of many naturalized exotic bird species, present in New Zealand for approx. 150 years, that is not an accepted part of our cultural landscape; It occurs in eastern lowland regions of New Zealand in relatively low numbers; Rooks benefit pasture farming operations in that they control invertebrate pest species; Rooks do not compete with and have no impact on indigenous biodiversity; Rooks are a member of the crow family, like the extinct New Zealand crow and as such may fill a vacant role in the New Zealand ecosystem processes; Rooks are "no better or worse" than other exotic bird species and for rooks to be singled out as a pest species is random at best; Rook control when numbers are so very low is a waste of rate-payer's money; Current control methods that are being carried out during the rook breeding period are cruel from an animal welfare and wasteful from a cost perspective. For all these reasons the rook should be removed from the RPMP.	Remove Rooks from the Plan.	Rooks	Reject	Rooks are recommended to be retained in the Plan as an eradication pest. Rooks are known to damage crops and pasture and ORC's rook programme has decreased rook population numbers in Otago from 3500 rooks in 1989 to less than 40 in 2018. The current cost of rook control is significantly less than control costs when rook numbers were high. When rooks are eradicated, this cost will reduce further to those costs associated with monitoring and surveillance to ensure rooks do not return. Rooks are declared as pests in other RPMPs including Canterbury, Hawke's Bay, Marlborough and the Waikato.
P284.2	Peter Ripley	There are only some 40 rooks left in Otago so it cannot be said to be particularly harmful to flora or fauna. Kereru also eat farm fruit and berries, so the rook is not unique at all and should not be targeted here simply because it is exotic. It is beneficial as a carrion feeder. This scraggy looking but highly intelligent bird is a welcome addition to New Zealand's sparse large bird fauna, and contrary to popular superstition has naught to do with witches or familiars - so let us leave it alone, but control it where and when numbers increase and so actually become an issue in certain areas. Summary: I would like you to not include Rooks as a pest to be eradicated in your 10 year plan, but rather as a pest to be controlled as and when required, which is not the current situation.	Include Rooks as a pest to be controlled, not eradicated.	Rooks	Reject	See the response to submission 219.1.
P306.2	Stephanie Ripley	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 Zealand's sparse large bird fauna. I would like you to not include Rooks as a pest in your 10 year plan.	Remove Rook from the plan	Rooks	Reject	See the response to submission 219.1.
P183.2	Routeburn Dart Wildlife Trust	I suggest that Wild Russell Lupin is recognised as a plant pest on braided river beds such as the Dart and Rees.	Add Wild Russell Lupin as a pest plant in areas with braided river beds.	Russell Lupin	Accept	Wild Russell lupin is a pest plant in the Plan and the rules require the clearance of it within the specified distances to rivers outlined in Rule 6.4.5.2.
P210.1	Guardians of Lake Hawea	In Section 4.1, we support the section in general and request an addition to it. We are very pleased that you have included Wild Russell Lupin/Lupinus polyphyllus as a pest organism. In our area it is of particular concern along John Creek, rapidly spreading to the adjacent lake shore and road verge. We would like you to also consider adding the Good Neighbour Rule to the policy for this plant.	Support Wild Russell Lupin/Lupinus polyphyllus as a pest plant in the Plan and include a Good Neighbour Rule.	Russell Lupin	Accept	The Panel finds merit in the inclusion of a Good Neighbour Rule to require the elimination of wild Russell lupin within 10m of a property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate wild Russell lupin within 10m of that boundary. The Panel directed staff, in collaboration with DOC, to consider the addition of a GNR to require the elimination of wild Russell lupin within 10 metres of a property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate wild Russell lupin within 10 metres of that boundary. We accept the staff assessment that the costs associated with the new GNR, and amended setback provisions are acceptable and worthwhile, given the biodiversity benefits arising from its control.
P228.1	Jim Douglas	I oppose the listing of wild Russel lupins as a new addition to the sustained control pest programme. Russel lupins are one of the iconic features of the inland Otago region be it on roadsides, river beds or waste land. It is a species which provides vibrant colour to a dry summer landscape and a significant tourist attraction in its beauty which is widely captured in memorable photographs. In addition it protects land and riverbeds from wind and water erosion. I know of no sound ecological reason why it should be added to a list of pest plants and simply because it is an exotic species is not a reason to do so.	Remove Russel Lupins from the Plan as a pest plant.	Russell Lupin	Reject	The adverse ecological effects of Russell lupin are outlined in Table 18 of the Plan. The Russell lupin rules in the Plan are only applicable in relation to its proximity to rivers, artificial water courses, and property boundaries.
P254.1	George Collier	I oppose the inclusion of Russell Lupin as a recognised weed in the Otago Regional Council catchment as per 6.4.5 sustained control programme for Russell Lupin. There should be no sustained control programme for Russell Lupin. We know that Russell Lupin is a palatable stock plant and there has been some excellent stock performance from Russell Lupins within Central Otago farming systems. We acknowledge that lupins will increase the soil nitrogen and may induce a change in the species composition in plant communities but from a commercial farming perspective this is actually what farmers want and need. A shift from low fertility heircium to good quality stock feed to produce income. Lupins appear to be one of the few plants that can compete with heircium and at the same improve soil health.	Remove Russell Lupin from the plan	Russell Lupin	Accept in part	See response to submission P255.2

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P255.1	Ben & Vanessa Hore	There is not a clear definition of the intent of this policy: on page 21 Wild Russell Lupin is identified as Russell Lupin that establishes by natural means however on page 55 restriction points are listed around the planting of wild Russell Lupin (how can it be wild if it has been planted?) there is need for clarification around this.	Clarify definition of 'Wild Russell Lupin' and how the definition and rules relate to Russell Lupin which has been planted.	Russell Lupin	Accept	Wild Russell lupin (established by natural means) is a pest species as listed in Section 4.1 of the Plan, of which Rule 6.4.5.2 applies. Russell lupin (such as Russell lupin that is planted) is a pest agent species as identified in Section 4.2 of the Plan, of which Rule 6.4.5.1 applies. Upon reviewing the Plan in relation to this submission, several amendments are proposed to make the Russell lupin provisions clearer. Rule 6.4.5.1 states that 'on rural zoned land no wild Russell Lupin shall be planted within...'. the word 'wild' is in error and is recommended to be deleted. Amendments are also recommended to Objective 6.4.5 and Section 4.2 to clarify the requirements in Rule 6.4.5.1.
P255.2	Ben & Vanessa Hore	We have sown over 80 hectares (ha) in a pasture mix of Russell Lupin, white clover and cocksfoot over the last 3 years. We have noticed an increase in the stock units run on this area from under 2 to over 8 per hectare; as well as massive lift in stock performance. Naturally low fertility and high soil aluminium leaves very few options for a persistent and economic legume content of productive pasture. Productive flat land is already operating at capacity; true high country is uneconomic and unreliable to develop so realistic option to increase productivity is to develop the moderate hill/low high country – much of which is low fertility and high aluminium. Many of these sites are also under threat from erosion so getting plants established is helpful in preventing this. The Lupin is renowned in gardening and farming (conventional and organic) as a soil conditioner. Flowering Lupin is visually attractive – some of the most photographed sites in NZ. It has been displayed on national TV each evening as backdrop on 7 Sharp over the last 2 years. Lupin is highly palatable to stock, they do need a good water source as high levels of alkaloids make them thirsty. This is evident through the Lindis pass - anywhere there is water and stock there is no lupin. It is easily controlled through grazing management and overgrazing can lead to it failing to persist. A neighbouring property has had a patch of Russell Lupin sown at their gate for well over 40 years – there has been no noticeable spread of this plant over this time suggesting the plant may not spread as easily as indicated in the proposed plan. High carbon storage is an unexplored opportunity where increasing influence is to become carbon neutral. The suggested negative impacts are unproven and not based on fact; is there any scientific evidence of these impacts? In our local environment regular flooding events keep the gravel river beds clear and the further edges are already covered in Broom which has absolutely no value, is also a legume, spreads seed easily and looks awful. No major council efforts have been observed to control the Broom so its negative impacts are obviously not deemed significant enough to warrant control work. If the plan is implemented as it is currently written – what is the impact on existing planted pastures containing Lupin?	We strongly request the removal of Russell Lupin from the Proposed Pest Management Plan.	Russell Lupin	Accept in part	The Staff Hearing Report noted that Russell lupin rules are likely to have a limited impact on farming operations as they are only applicable in relation to its proximity to rivers and artificial water courses, and property boundaries. We heard evidence from the submitter at the hearing on the current success of planting Russell lupin for primary production purposes on the submitter's property. We directed staff in Minute 6, in collaboration with DOC, to consider whether amendments are required to the provisions regarding the control of Russell lupins. We find the amended set back provisions acceptable and worthwhile, given the biodiversity benefits arising from its control. We note that the cost benefit assessment for the setback amendments assessed these amendments both at a regional scale, and at a farm scale in response to the submissions from Blackstone Hill Ltd and George Collier (P255 and P254) and that the CBA demonstrates that the proposed rules are reasonable, even without having to apply a 10m setback to intermittent rivers. We directed in Minute 7 that submitters have the opportunity to provide their written views on workability and technical matters. We received two items of written feedback from submitters. A key question raised in both items of feedback was the question around the timeframes of the Russell Lupin Management Plan (RLMP). We recommend that a ten year timeframe for the RLMP is appropriate providing there is provision for a review at any stage upon request by either party.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P258.14	Forest and Bird	The inclusion of wilding Russell lupins is welcomed and we would like it to go further. Russell lupins are now appearing along roadsides in many parts of Otago including in areas close to water ways. The impacts of Russell lupins are such that Forest and Bird considers they need to be listed as a pest species so that Sections 52 and 53 of the Biosecurity Act 1993 apply. Forest and bird urges Council to undertake an ongoing and properly resourced education programme targeted at both landowners and the general public as it is not fully appreciated that 'attractive' flowering species such as Russell Lupin are in fact a considerable biodiversity threat. They are often used in images as part of tourism promotion. Given the greater emphasis on prevention the Council is contemplating it is important that ORC liaises with industry around development of new crops, possible land use change etc.... We note that the benefits and costs of Russell lupin have not been quantified due to lack of data about the extent of the pest, making it difficult to have a stronger rule in this plan. However it needs to be remedied in preparation for the next plan. This needs to be recognised and included into the Plan Objective or in the Biodiversity Strategy. Our preference is that the Objective and rule is amended for this plan.	Council takes on a landowner education programme aimed at explaining the impact and need to control Russell lupins, and undertakes a cost-benefit analysis of the control of Russell lupins, preferably for inclusion in this Plan, if not for the next Pest Management Plan.	Russell Lupin	Reject in part	ORC intends to provide more information about pests to the public and one of the key projects proposed in the Strategy states 'Prepare new guidance material for the ORC website as a 'pest hub' on the identification, effects and control methods for pests and harmful organisms. Priority species for the first year includes the species in the Pest Management Plan, aquatic and marine weeds, horehound briar, giant hogweed, hawthorn, rowan, boxthorn, and hieracium. The rules in the Plan seek to control both wild and planted Russell lupin where it is in proximity to rivers, artificial watercourses and adjoining property boundaries. We heard evidence at the hearing on the current success of planting Russell lupin for primary production purposes. We directed staff in Minute 6, in collaboration with DOC, to consider whether amendments were required to the provisions regarding the control of Russell lupins. We find the amended set back provisions acceptable and worthwhile, given the biodiversity benefits arising from its control. We note that the cost benefit assessment for the setback amendments assessed these amendments both at a regional scale, and at a farm scale in response to the submissions from Blackstone Hill Ltd and George Collier (P255 and P254) and that the CBA demonstrates that the proposed rules are reasonable, even without having to apply a 10m setback to intermittent rivers. We directed in Minute 7 that submitters have the opportunity to provide their written views on workability and technical matters. We received two items of written feedback from submitters. A key question raised in both items of feedback was the question around the timeframes of the Russell Lupin Management Plan (RLMP). We recommend that a ten year timeframe for the RLMP is appropriate providing there is provision for a review at any stage upon request by either party along with other minor changes so that the rule is clear.
P258.15	Forest and Bird	Objective 6.4.5 should be amended to read: Over the duration of the plan sustainably control the extent of Russell lupin to preclude their establishment in indigenous ecosystems and within specified distances of water ways to prevent adverse effects on environmental values. Forest and Bird seeks that the Principal measures to be used be amended to include surveillance work to determine the extent of Russell lupin.	Objective 6.4.5 and Principal measures, in respect to Russell lupin, are amended as sought.	Russell Lupin	Reject	The objective seeks to manage Russell lupin within specified distances to prevent adverse effects on environmental values. This is not exclusive to indigenous ecosystems as Russell lupins have other environmental effects such as the potential to exacerbate flooding and erosion as outlined in Table 18 of the Plan. Additionally, no amendment is recommended to the Principal Measures as the description of Council Inspection Section 5.3 includes surveillance.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P266.10	Lindis Pass Conservation Group Inc	7.1. Measuring what the objectives are achieving: Wild Russell Lupin. Indicator: no presence within specified distances to waterways. Our submission as above is that this measurement is too limited and will be ineffective. While sideways spread from waterways is very significant, and containing it to within 200m of braided streams, and within 50 m of other streams is necessary, it also needs to be better acknowledged that lupin has to be managed in a “top-down” manner, ie from the upper parts of catchments to the lower. Not all lupin is along waterways. And while the Plan hints at understanding this, as a base concept it needs to be given more prominence. An indicator should be that it is absent from upland valley heads, open tussock, rangeland and the verges of highways. These are critical sites for targeting its spread.	1. ORC understands that the waterways are critical for distributing lupin seed, but also that it first comes from high up in catchments via road corridors where the seed hides and survives in gravel that has been spread for winter ice management: that it spreads outwards from roads into open country, and that it is carried downstream by water. 2. Indicator: has no presence within specified distances to waterways; is absent from upland valley heads, open tussock and rangeland; and is absent from the verges of highways and rural roads.	Russell Lupin	Accept in part	The Panel acknowledge that waterways and roadsides are critical for distributing Russell lupin seed and this is why the rules in the Plan have been proposed. An amendment is recommended to the indicators so this includes the absence of Russell lupin adjacent to boundaries.
P266.8	Lindis Pass Conservation Group Inc	6.4.2. Wild Russell lupin, <i>Lupinus polyphyllus</i> : Wild Russell Lupin is an invasive and damaging pest weed which needs to be eliminated in its entirety, particularly from protected Conservation land including high value Scenic Reserves. It smothers and shades native herbs, orchids and grasses, changing the soil around them, and in so doing reduces essential indigenous biodiversity. Its continued presence in high country valleys and grasslands is counter to the aims of biosecurity. We agree with the reasons given in the Plan for its inclusion as a pest plant. Education about native plants and bird life, and about lupin’s role in negatively overwhelming them both, should be an essential part of the Plan. Many people can’t see past its brief seasonal flowering. When pest plants are explained to them, tourists do understand the role of containment. Russell Lupin severely compromises the Lindis river valley as braided river habitat for birds, as free-flowing fresh water for organisms, and in terms of recreational access and economic water management. Water in the Lindis is of critical importance for a number of natural and economic purposes; having weed lupins soak it up is not effective management of a scarce resource.	1. ORC to develop a strategic catchment-based plan for lupin control, so that each effort is feasibly managed and achieves the desired result. 2. ORC to systematically remove this pest plant via a “top down” approach, starting at the highest points of watersheds and following the plant down-stream, at the same time limiting its sideways spread upslope from waterways, particularly up into soaks and small side streams adjacent to larger rivers. 3. With the assistance of NZTA, ORC to progressively eliminate Russell Lupin from and adjacent to the highway corridor, thus inhibiting its spread into natural tussock grassland and rangelands. 4. At places where tourists gather, ORC to insert Information Panels to explain the purposes driving this effort. 5. ORC to acknowledge that if the problem is not tackled now, because of the persistence of the seed through time, and the difficulty of getting seedlings out of creek beds, bogs, and the rough shrubbery on stony hillsides, this pest plant will become unmanageable.	Russell Lupin	Reject	See response to submission 258.14.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P266.9	Lindis Pass Conservation Group Inc	Objective 6.4.5, Plan Rule 6.4.5.1, Plan Rule 6.4.5.2: Wild Russell lupin. We submit that the Objective and Rule are not adequate to the problem as defined. As presently worded, the Plan requires only that Russell Lupin is contained to within 200m of braided streams, and 50 m for non braided. This misses half of the issue. Objective 6.4.5 should preferably be to progressively contain Russell lupin, to preclude its establishment in tussock grassland ecosystems and in highway corridors. We submit that a wider rule is needed, to remove lupins from tussock grasslands roadsides and rangeland, thus preventing; 1. Weed invasion of waterways on an ongoing basis and, 2. Loss of tussock grassland ecosystems. To control Russell lupin, it is necessary to remove it by a “top down” sequence of actions in any catchment, as the seeds of upstream plants become a significant source of infestation downstream.	1. ORC to Progressively Contain Russell lupin to preclude its further establishment in tussock grassland ecosystems and on Conservation land. 2. ORC to require occupiers of rural zoned land to eliminate wild Russell lupin from extensively grazed tussock grasslands and indigenous shrublands, from within 50m of any boundary of land where lupins are being controlled. 3. ORC with NZTA to target roadsides, highway verges and open up-stream sites for lupin control, understanding that control has to be “top down” in terms of landscape sites of origin.	Russell Lupin	Reject	See response to submission 258.14.
P270.3	Otago Fish and game	The information provided on russell lupin is focused on impacts on birds. However, changes in hydrology, caused by sediment being caught and accumulated by lupins and other species, can significantly change the habitat provided for a range of species, including birds, fish and invertebrates. Fish and Game suggests that these impacts be recognised by making the following changes to the second paragraph in this entry.	The second paragraph of the description of Russell lupin within Table 18 is amended as follows:… The dense infestations also interfere with water flow along these rivers, impacting on natural character and ecosystems for the birds and aquatic species that rely on this habitat <del>live here</del> . Increased soil nitrogen may induce change in species composition in plant communities from low fertility species to weed species.	Russell Lupin	Accept	The requested amendment clarifies that Russell lupins can affect aquatic species as well as birds.
P300.2	Ruth-Ann Anderson	With regard to the Russell Lupin, we are seeing a dramatic increase in their spread on waterways here in the Wakatipu. The proposed control should be altered to include areas where the spread is human assisted.	Extend control to areas where the spread is human assisted	Russell Lupin	Note	Human assisted spread is controlled by Pest Agent Rule 6.4.5.1 which prohibits planting within specified distances of rivers, waterways and property boundaries.
P309.2	Alison Brown	We are very pleased to see that Russell Lupins have been added to the list in section 4.1. 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.	Supports the inclusion of Russell Lupins	Russell Lupin	Accept in part	The submitter supports the Russell lupin programme. No rules are recommended for yellow tree lupin. However, Tree lupin is recommended to be included to Appendix 1 in the Plan as an Organism of Interest so surveillance can be undertaken to determine whether any regulatory control in the future may be needed.
P309.3	Alison Brown	Property owners are not attempting to grow Russell lupins but some are experiencing incursions from 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.	Addition of Good Neighbour rules to for wild Russell lupin.	Russell Lupin	Note	See submission P210.1.
P309.4	Alison Brown	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.	Seeks action to control lupins at Johyns creek but avoid use of spraying involving toxins around waterways for the treatment of Russell lupin	Russell Lupin	Reject	This is an operational matter and outside the scope of the Plan, but will inform ORC's surveillance of Russell lupin.
P312.20	Land Information New Zealand	Section 6.4.5 Sustained control programme for Russell lupin: 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.	Russell Lupin	Accept	The submitter supports the Russell lupin programme.
P312.3	Land Information New Zealand	Section 4.2 – Pest agents: LINZ supports the definition of wild Russell lupin as a ‘pest agent’ in section 4.2. 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. 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. 1. LINZ supports the definition of wild Russell lupin as a ‘pest agent’ in section 4.2. 2. Define conifers as a ‘pest agent’ in section 4.2: “Pest agent rules are included in the Proposal to ensure the success of the related pest objective for wild Russell lupin Lupinus polyphyllus and for wilding conifers (Pinus muricata, Pinus contorta, Pinus nigra Pseudotsuga menziesii, Larix decidua, Pinus pinaster, Pinus mugo and P. uncinata, Pinus 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).” 3. Include a pest-agent rule for conifers.	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.	Russell Lupin	Accept	The submitter supports the definition of wild Russell lupin as a pest agent. See response to submission P312.11 regarding wilding conifers.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P328.4	Josie Harris	Lupins have become naturalised and should not be considered a pest species	Remove lupins from the plan	Russell Lupin	Reject	Russell lupins have adverse effects on the environment and these are described in Table 18 of the Plan.
P335.7	Barrie Wills	In relation to [Section 4.2] Clarify what is meant by 'Pest Agents'. Reading the Lupin section under 6.4.2, I see no reference to any 'Pest Agent Rules'. Where are they included??	Include pest agent rules and refer to these in section 4.2	Russell lupin	Reject	Pest agents are defined in the Biosecurity Act 1993 and that definition is provided in Section 4.2. Rule 6.4.5.1 is a pest agent rule, and this is stated in bold under the rule number.
P340.2	Terry Drayton	Oppose the inclusion of Russel Lupin as it adds to biodiversity. Waterways benefit from planting in terms of flood.	Remove Russel lupin from the Plan.	Russell Lupin	Reject	The adverse ecological effects of Russell lupin are outlined in Table 18 of the Plan.
P105.1	Paul Williams	Eradication of Sycamore and seedlings on the Otago Peninsula. should be added as a goal for the site-led programmes on the Otago Peninsula.	To introduce and promote some measures and investment towards eradicating sycamore species on the Otago Peninsula.	Sycamore	Reject	ORC has not been involved in the management of sycamore on the Peninsula in the past and has no data to determine if eradication is feasible in the next 10 years. A progressive containment objective is therefore considered more appropriate.
P116.1	Ngaere Moss	Would like to see the eradication of sycamores. They have taken over and spread in our area for 50 years. Spoilt our lovely view. Seedlings all over the garden.	Include sycamores as a pest plant in the Plan.	Sycamore	Reject	Sycamore is widespread and the Panel considers a complete eradication programme is not possible over the next 10 years.
P267.7	Arrowtown Village Association	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore as a sustained control Pest.	Sycamore	Reject	Although the Panel is aware of the impacts of sycamore, a sustained control programme is not considered appropriate at this stage. The Panel notes that ORC staff are aware sycamore is prevalent in Dunedin and Wakatipu, however ORC does not hold surveillance information on it currently. We note that ORC staff will undertake surveillance of sycamore in Otago to gather additional information on sycamore, and particularly in sensitive areas, to inform the management approach for sycamore into the future. This may inform any future changes, including any new site-led programmes or regional wide rules in the subsequent plan review.
P268.6	Fiona Rowley	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore to the Plan as a sustained control pest.	Sycamore	Reject	See response to submission P267.7.
P282.7	Duncan Keenan	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore as a sustained control Pest.	Sycamore	Reject	See response to submission P267.7.
P283.7	Wakatipu Reforestation Trust	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore as a sustained control Pest.	Sycamore	Reject	See response to submission P267.7.
P313.7	Carrie Pritchard	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore as a sustained control Pest.	Sycamore	Reject	See response to submission P267.7.
P315.7	Andrew Davis	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Sustained control of sycamore	Sycamore	Reject	See response to submission P267.7.
P318.7	Ben Teele	Sycamore is an additional wilding tree that can invade native landscapes through its shade tolerance. As such, it should be moved from the site-led management programme to sustained control.	Add Sycamore as a sustained control Pest.	Sycamore	Reject	See response to submission P267.7.
P003.1	Connie Masters	Any change to the regional pest plan should make wilding pines the responsibility of the land owner the same as goarse, broom, rabbits and nodding thistles which are all the problem of land owners.	Any change to the regional pest plan should make wilding pines the responsibility of the land owner.	Wilding Conifers	Note	The national programme for wilding conifer control seeks to support land occupiers with control by partially funding control works. The Plan seeks to align with this approach and with the rules in the pest management plans of neighbouring councils in order to provide a consistent approach at a sub national level. However, once publicly funded control works have been undertaken, the land occupiers are responsible thereafter. Land occupiers are also responsible for complying with the boundary control rules.
P009.1	Tina Owen	4.1 Wilding conifers. If wilding conifers are paid for by general rates, where is the incentive for landowners who plant for forestry to prevent seed dispersal. If they are a pest, there should never be given permission to be planted.	Wilding conifers should not be planted.	Wilding Conifers	Reject	ORC is unable to put in place rules that restrict the planting of conifer species where this is inconsistent with the National Environmental Standard for Plantation Forestry 2017. Section 69 of the Biosecurity Act 1993 provides that, to the extent to which a regulation made under the Biosecurity Act 1993 or any other Act is inconsistent with a rule in a regional pest management plan, the regulation prevails.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P064.1	Prof. Alan Mark	I find the wilding conifer issue quite complex as the Plan seems to apply to only six species throughout: Pinus contorta, P. nigra, P. uncinata, P. mugo, P. sylvestris and Larix decidua, and refers to them as of little commercial value and hence considered for "Progressive containment". But the plan also lists Pinus muricata, P. pinaster, P. ponderosa, P. radiata, and Pseudotsuga menziesii separately (in Table 3: Introduced conifer trees) though I can find no further reference to them under regulations applying to wilding conifers. This concerns me, since these species also constitute a serious threat as wildings, particularly Douglas fir. The inclusion of these species essentially as a class of pest named 'wilding conifers' has been a major step forward and I note it has also been recognised in ECAN's RPMP. There seem to be no rules for these species but at least their recognition as 'wilding conifers' is significant and hopefully will be improved on in future. I presume their omission from further consideration in this plan is because they are commercially used species but this does not mean they do not pose a serious wilding threat in many locations. This should be a serious consideration at the time of consent applications, which are likely to increase substantially under the Governments one billion trees planting programme.	Consider adding Pinus muricata, Pinus pinaster, Pinus ponderosa, Pinus radiata, and Pseudotsuga menziesii to the progressive containment list.	Wilding Conifers	Reject in part	These species are included in the Plan rules where they are established by natural means. They are unable to be included as planted trees as this would not likely be consistent with the National Environmental Standard for Plantation Forestry 2017. Section 69 of the Biosecurity Act 1993 provides that, to the extent to which a regulation made under the Biosecurity Act 1993 or any other Act is inconsistent with a rule in a regional pest management plan, the regulation prevails.
P064.2	Prof. Alan Mark	As for the six species considered further, I note that full responsibility is put on the occupier, and as for the "Responsibility for region-wide wilding conifer control" it states that this is "beyond the financial resources of the ratepayers" (and hence the ORC) and further, that "there are no alternative measures that provide for satisfactory inspection, education and advocacy measures." I find this quite unacceptable. This must surely be an important role for the ORC. Further the Plan Rule 6.3.4.1 puts the onus fully on the occupier though conditions are rather complex, and may cause confusion.	Council should play a greater role in wilding conifer control.	Wilding Conifers	Note	ORC currently has a role in the national wilding conifer control programme and provides financial support to the national programme and intends to become more involved as a result of the wilding conifer provisions in the Plan. The provisions have been prepared to be largely consistent with other regions and the Panel notes that ORC Staff will prepare guidance material as part of a new on-line 'pest hub' to assist land occupiers in understanding their role in wilding conifer control.
P064.3	Prof. Alan Mark	Then, in Part 2; Pest management (pp. 81-2), it states that pest management, under the Progressive Control Programme, control and maintenance is the responsibility of the National Wilding Conifer Control Programme, with annual inspections. I would have thought that the ORC was responsible for the NWCCP's role in the Otago Region: Is this not so?	Clarify roles in respect to wilding conifer control in Otago.	Wilding Conifers	Note	The National Wilding Conifer Control Programme is led by MPI, however the role of ORC at a regional level is significant. The Panel accepts the information provided in the Hearing Report in this regard.
P064.4	Prof. Alan Mark	Also I can find no mention of the Wilding Conifers in the Part 3 Section on Funding, though currently I think the Council has contributed \$100,000 annually, recently increased to \$200,000 I think, to allocate to groups, on application, for wilding control throughout Otago. And further, I thought the ORC is responsible for administering and distributing the Government's annual allocation of funding for wilding control but I see no mention of this in the plan. This implies that ORC is attempting to defer its obligations to oversee or actively engage in control wilding conifers in Otago to the National Wilding Conifer Control Programme. I am aware that the that ORC has taken on the role of Fund holder for the national programme, whereby it holds the national funds for work in the Otago region on behalf of MPI and any other funders. This is presumably done under a Funding Agreement with MPI, as with the adjoining regional councils, ES and ECAN and other regional councils actively involved in the programme. It seems that under this arrangement, the ORC only has to be accountable for the proper use of the funds and is not obliged to undertake any control or oversight itself. Up to now the ORC seems to have been very reluctant to take on any substantial responsibility in respect to wilding conifer management or its oversight, which I find both disappointing and concerning. To me, the ORC is the relevant and most appropriate organisation to provide at least oversight of control operations throughout the Otago region, and I therefore recommend that it fulfils this function under the terms of the revised Plant Pest Strategy. This would give it a role consistent with both its neighbouring regional councils, ES and ECAN.	Clarify roles in respect to wilding conifer control in Otago and requests ORC provides oversight of control operations throughout Otago.	Wilding Conifers	Note	See response to submission P064.2.
P074.1	Morgan Williams	Please complete the cutting down of the wilding pines on the Raggedy Range opposite Alexandra town to the south of the Little Valley Road. You have made a good start on the work done in December 2017.	Requests ORC complete wilding pine control on the Raggedy Range.	Wilding Conifers	Reject	This is an operational matter and outside the scope of the Plan. However, the Panel is aware that control is needed in this area and will work with the National Wilding Conifer Control Programme on what needs to be done to manage wilding conifers in this area.
P106.2	Olly Laytham	Nursery sales of seedlings of forbidden species.	Co-operative nursery owners required and remuneration for destroying saplings already growing privately.	Wilding Conifers	Note	The propagation and sale of Unwanted Organisms and organisms declared as pests in the Plan is prohibited in accordance with Sections 52 and 53 of the Biosecurity Act.
P121.1	Central Otago Wilding Conifer Control Group	Section 4.1 Organisms Declared as Pests. Submission; Support contorta, Corsican, Mountain, Scots and wilding pines and Sycamore being pest plants.	Support for wilding conifers and sycamore listed as pest plants.	Wilding Conifers	Accept	The submitter supports the inclusion of contorta pine, corsican pine, mountain pine, Scots pine, wilding pines and sycamore.
P121.10	Central Otago Wilding Conifer Control Group	Plan Rule 6.3.4.1 Support the rule and explanation with an amendment to make the rule apply to the first 5 years of the Plan. P. contorta should be removed as it is proposed to be dealt with in a prior clause described above.	Support Rule 6.3.4.1 subject to amendments to ensure the rule applies in the first five years of the plan. If earlier relief (proposed new rule in relation to Pinus Contorta) is adopted, amend this rule accordingly.	Wilding Conifers	Reject	We heard from the submitter at the hearing and it was clarified that the submitter sought that the Rule would apply to all planted conifers and that the rules would take legal effect after five years. The submission is recommended to be rejected for the reasons set out in response to the submitters previous submission points.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P121.11	Central Otago Wilding Conifer Control Group	Plan Rule 6.3.4.2 Submission: Support the rule with an amendment to make the rule apply to the first 5 years of the Plan. P. contorta should be removed as it is proposed to be dealt with in a prior clause described above. Submission: In the Explanation of rule, replace "Over the duration of the Plan" with "In the first 5 years of the Plan", to ensure that.... Also add an apostrophe after wilding conifers in the first sentence. Submission: In the Explanation of rule, remove the last paragraph. Comment: The rule is in effect providing protection for an investment made to clear wilding conifers from being re-invaded from a neighbours pest plants. It seems unreasonable that the party that contributes in most cases 80% of the cost of control, that being the public, cannot initiate action under this rule to protect its investment.	Support Rule 6.3.4.2 subject to amendments to make the rule apply in the first 5 years of the plan. If earlier relief (proposed new rule in relation to Pinus Contorta) is adopted, amend this rule accordingly. Remove the last paragraph of the explanation for this rule, which currently states 'Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier'.	Wilding Conifers	Accept in part	A five year timeframe for the rule is not recommended. Removing the statement 'Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier' is recommended to be accepted as this will ensure that investment in wilding conifer control is protected and that the rule must be met at all times.
P121.12	Central Otago Wilding Conifer Control Group	Submission: Insert additional rule to make it a requirement that landowners within the Otago Region destroy all wilding pines and pest plant conifers after the first 5 years of the Plan unless those conifers are included within an area that forms part of an active wilding conifer control programme approved by the council. Submission: Include Explanation of additional rule with the following; The purpose of this rule is to ensure that there is consistent action taken with control wilding conifers throughout the region and to protect the private and public investment made in controlling wilding conifers previously. It is accepted that seed from these species can be spread in high winds over considerable distances effecting sometimes many neighbours some distance from the seed source. An opportunity will exist within the first 5 years of the Plan for land occupiers to participate in the National Wilding Conifer Control Programme where a majority of the cost of control will be met by regional and central government. It is therefore not unreasonable to expect land owners and occupiers to have either entered into a programme or to have taken action themselves to remove these pest plants.	Include additional rule under Plan Objective 6.3.4 as stated.	Wilding Conifers	Reject	The Panel considers that it would be inequitable to require some occupiers to fully fund control, where control is partially or fully publicly funded (in most cases by the National Programme) on other sites.
P121.13	Central Otago Wilding Conifer Control Group	Plan Rule 6.3.4.3 Submission: Support the rule with an amendment to make the rule apply to the first 5 years of the Plan. P. contorta would be removed as it is proposed be dealt with in a prior clause described above. In the Explanation of rule, remove the second paragraph. For the same reason as above.	Support Rule 6.3.4.3 subject to amendments to make the rule apply in the first 5 years of the plan. If earlier relief (proposed new rule in relation to Pinus Contorta) is adopted, amend this rule accordingly. Remove the second paragraph of the explanation for this rule, which currently states 'Any action pertaining to non-compliance will only be initiated upon a complaint in writing from the adjoining affected occupier'.	Wilding Conifers	Accept in part	The submission is accepted in part for the same reasons set out in response to submission point P121.11.
P121.14	Central Otago Wilding Conifer Control Group	Comment: It is noted that, as they are written, rules 6.3.4.1 to 6.3.4.3 create a perverse incentive for land occupiers to not enter into a programme of control where public funds are used. The rules also do not ensure that action is taken on all land within the Otago region to destroy, or to have a plan to destroy, the conifer pest plants listed in the Plan which will be necessary to meet the objective of the Plan within its term. It is our view that from observations of current wilding spread in Central Otago, requiring control within 200 metres from a boundary is inadequate for preventing spread from a seed source. There is clear evidence that spread is occurring up to 20km from seed sources.	Addressed through proposed amendments to Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 as above.	Wilding Conifers	Note	The Panel agrees that this may be a risk in some cases, but that this risk is generally low. As the initial control cost is high and it is the initial control cost that is partially funded, it is in the best interest for land occupiers to keep cleared areas clear once control works have been undertaken. The Panel considers destroying any wilding conifers that seed prior to cone bearing following this work is more cost effective than not doing so, as the control costs in the future would be significantly higher.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P121.15	Central Otago Wilding Conifer Control Group	Adopt an additional Rule 6.3.4.4 as sought in relief. Comment: While Douglas fir is not a pest plant itself, it is a major wilding specie within Central Otago. Much of the spread of Douglas fir in Central Otago comes from commercial forests. There are currently several forest plantations of Douglas fir planted in highly vulnerable sites which have yet to reach coning age. Without recognising the contribution these forests make to the spread of wilding conifers in Central Otago with a Pest Agent rule, no preventative action can be required of land occupiers to reduce the spread threat from these forests. The result of the current proposed rules will be that neighbouring landowners and/or the public will meet the ongoing cost of wilding control from existing commercial plantations in high risk sites.	Additional Rule 6.3.4.4 This is a pest agent Rule. Occupiers of land within The Otago Region where Douglas fir plantations of greater than 1 hectare are planted and where the Wilding Spread Risk Calculator score exceeds 12 points shall, within the first 5 years of the plan, submit to the council a plan for effectively reducing and mitigating the spread of seed from their land within the term of this Plan. Explanation The purpose of this rule is to require occupiers of land that is presently planted in Douglas fir on sites where there is a high risk of spread from that site to take reasonable actions to reduce the risk of spread of wilding conifers to neighbouring land.	Wilding Conifers	Reject	The Panel considers a pest agent rule for douglas fir as sought may not be consistent with the National Environmental Standard for Plantation Forestry 2017. Section 69 of the Biosecurity Act 1993 provides that to the extent to which a regulation made under the Biosecurity Act 1993 or any other Act is inconsistent with a rule in a regional pest management plan, the regulation prevails.
P121.2	Central Otago Wilding Conifer Control Group	Submission; amend by removing reference to sub-note 5 for Contorta pine so giving effect to a requirement to remove all Contorta from commercial forests. Comment: The proposal as stated would have the effect of allowing P. contorta to be retained as a forest species when the current RPMP requires that this specie be progressively eliminated from plantations. It cannot be intended to be used for plantation purposes because it is a pest specie.	Remove the exclusions provided at sub-note 5 of Table 2 (organisms declared as pests) which excludes specimens used or intended to be used for plantation forestry purposes.	Wilding Conifers	Accept	Contorta is an Unwanted Organism and sub note 5 has been removed from it.
P121.3	Central Otago Wilding Conifer Control Group	Submission; amend heading of section 6.3.4 to include apostrophe after wilding conifers.	Amend heading of section 6.3.4 to include apostrophe after wilding conifers.	Wilding Conifers	Accept	The heading in Section 6.4.4 is amended.
P121.4	Central Otago Wilding Conifer Control Group	Submission; support wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pine and larch being managed by programme of progressive containment.	Support for progressive containment status for listed wilding conifers.	Wilding Conifers	Accept	Support for progressive containment status for listed wilding conifer species is noted.
P121.5	Central Otago Wilding Conifer Control Group	Description of pest and adverse effects: Submission; amend and add to end of 3rd paragraph in description so that it reads; Control efforts to date have been very successful where the work has been carried out, but will require ongoing effort for many years to come in follow-up, in areas where control is yet to be undertaken and in removing seed sources. <u>The seed source for spread is in some cases from planted conifers in the form of shelterbelts and forestry plantations which will require removal or mitigation actions if control of wilding conifers is to be achieved over the long term.</u>	Amendment to Description of pest and adverse effects section for wilding conifers.	Wilding Conifers	Accept in part	It is useful for the description to indicate that shelter belts and forestry plantations provide a seed source, and that work in accordance with the Plan will often include addressing the source of spread. However, removing the source of spread is not practical or feasible in all circumstances. The addition is recommended to be accepted in part and the additional text requested be modified to state: The seed source for spread is in some cases from planted conifers in the form of shelterbelts and forestry plantations.
P121.6	Central Otago Wilding Conifer Control Group	Submission; Oppose last sentence under Existing planted conifers less than 1ha which refers to existing shelter belts of contorta. Replace with a requirement for landowners to develop a plan approved by the council to remove their contorta and other pest plant shelterbelts within a period of 5 years and replace with non-spreading species. Comment: The current RPMP (4.7.4) requires that landowners destroy all contorta and to progressively destroy contorta within the Contorta Clearance Area and to ensure that no coning-age contorta tree is in a position where it could spread beyond the boundaries of the Contorta Containment Area. The proposed Plan provides no legal assurance that contorta pine in shelterbelts, which are a major seed source of spread, will be dealt with. Neither is there any mention of it being addressed in the Biosecurity Strategy. The current proposal allows landowners with contorta shelterbelts to continue to impose in some case significant costs of wilding control on neighbours.	Amend section 6.3.4 to delete exclusion for existing planted conifers less than 1ha. Amend rules accordingly.	Wilding Conifers	Note	A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. The Panel consider that the removing of shelterbelts and small scale plantings without a non-regulatory transitional period first would impact land occupiers that use these trees for stock shelter and other uses such as windbreaks. However, the Hearing Panel recommends an addition to the Strategy to require the compilation of a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P121.7	Central Otago Wilding Conifer Control Group	Plan Objective 6.3.4 Submission; Support the objective with the following amendment; Over the duration of the Plan, progressively contain and reduce the geographical extent of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch and reduce the seed rain effect of existing conifer plantings on vulnerable landscapes within the Otago region to minimize the adverse effects on economic wellbeing and the environment. This will involve the destruction of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch and may involve the replacing of some plantings with sterile or low spreading propensity species. Comments: For all conifers which are planted in close proximity to vulnerable landscapes, it can be difficult to successfully control or manage the spread of wilding conifers over the long term if the seed source is not removed or appropriately managed and contained. Ensuring that all practicable steps are taken by landowners and occupiers to minimize the seed rain from existing plantings needs to be an objective of the plan if we are to achieve long term control of wilding conifers.	Amend Plan Objective 6.3.4 as follows: Over the duration of the Plan, progressively contain and reduce the geographical extent of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch and reduce the seed rain effect of existing conifer plantings on vulnerable landscapes within the Otago region to minimize the adverse effects on economic wellbeing and the environment. This will involve the destruction of wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch and may involve the replacing of some plantings with sterile or low spreading propensity species.	Wilding Conifers	Reject	See response to submission P121.6 above. As a non-regulatory approach to the removal of shelter belts and planted conifers of less than 1ha is recommended, the submitter's requested amendments to the objective are not recommended.
P121.8	Central Otago Wilding Conifer Control Group	Add a new rule prior to rule 6.3.4.1. The rule we propose is by in large a repetition of the existing rule in the 2009 strategy with the added proviso that occupiers establish plans for progressively eradicating P. contorta from their production forests. It is our view that the rule in the existing strategy failed to achieve its objective because of lack of follow up monitoring and enforcement by the council rather than anything inherent in the rule. It is noted that P. contorta is classified an Unwanted Organism in the proposed plan which would allow the council to declare a programme of control however no such control plan is included.	Add a new rule prior to Rule 6.3.4.1 to eradicate P.contorta from production forests.	Wilding Conifers	Reject	The production stands in these forests have been cleared under the Operative Plan. There are still some wilding contorta that are appearing in these areas. As contorta is an unwanted organism, ORC can continue to work with these land occupiers and can direct them to control their spread, rather than requiring additional rules in the Plan.
P121.9	Central Otago Wilding Conifer Control Group	Add rule which states; (i) Within the Otago region occupiers shall destroy all contorta pine on land that they occupy prior to cone bearing except within the Contorta Clearance Areas and Contorta Containment Areas defined in Appendix... (ii) Occupiers within a Contorta Clearance Area defined in Appendix ... must progressively destroy all Pinus contorta within that Contorta Clearance Area so that; (a) the whole of the land occupied by them in that Area is clear of Pinus contorta within 5 years of this plan becoming operative; and (b) After 5 years of this Plan becoming operative, occupiers must ensure that all Pinus contorta in a Contorta Clearance Area are destroyed prior to them producing cones. (iii) Occupiers within a Contorta Containment Area defined in Appendix ... must ensure that no coning-age Pinus contorta tree is in a position where its seed could spread beyond the boundaries of that Contorta Containment Area and must, within 5 years of this Plan becoming operative, provide to the council a plan of how they intend eradicating Pinus contorta from the land they occupy. A breach of this rule creates an offence under section 154N(19) of the Act. Explanation of rule: The purpose of this rule is to progressively eradicate Pinus contorta from the Otago Region. Although Pinus contorta is but one of the Pinus species considered a pest in the region, its potential to spread rapidly over a long distance and the potential economic cost of control means it warrants being treated more urgently than other species.	Add a new rule prior to Rule 6.3.4.1 to eradicate P.contorta from production forests.	Wilding Conifers	Reject	See response to submission P121.8.
P122.1	Dawn Sangster	Amend. On our Paerau property in the Maniototo it is very difficult to grow trees and they are critical for animal welfare during the winter period. We started planting shelter belts in the 1970's and many varieties have been trialled since with limited success. Some of our best shelter is now included in the pest list. We have started trialling varieties of flax and toi toi in areas where centre pivots have been installed. They will be some value but there is no substitute for trees during a snow storm. We have one belt of Leyland cyprus on the road edge but are having trouble establishing these on lower lying land.	Provide clarity on time frames and assistance to trial alternative species bearing in mind that trees take 20 years to grow. Research and consider chemical applications that may reduce seeding of established shelter.	Wilding Conifers	Note	This is an implementation matter. A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. There are no rules in the proposed Plan for this transition as ORC staff are mindful of the transition time that may be needed by some land occupiers. However, the Hearing Panel recommends an addition to the Strategy to require the compilation of a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.
P174.5	Helen Clarke	For Proposal 6.3.4 I support progressive containment of wilding conifers in Otago with the aim of eradication in the most sensitive areas. Sustained support of the Wilding Conifer groups is to be supported.	Support proposed wilding conifer control measures.	Wilding Conifers	Accept	The submitter supports the inclusion of wilding conifers in the Plan.
P181.1	Wenita Forest Products Limited	Wenita supports the purpose of the Proposed Regional Pest Management Plan (PRPMP) in principle, however we do have concerns with some of the provisions. Specifically: 1. Organisms classified as pests (Table 2) includes Wilding Conifers, which in turn reference Table 3 (Introduced Conifer Trees). This Introduced Conifer Trees list includes Radiata Pine, the most widely planted and important commercial plantation species in NZ. Radiata Pine is not a renowned wilding species and we are concerned that by association it is being reclassified as a wilding species in this plan and this may have unintended consequences for Radiata Pine in the future.	Remove Radiata Pine from the list of organisms declared as pests.	Wilding Conifers	Reject	The rules in the Plan relate to radiata established by natural means only.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P181.2	Wenita Forest Products Limited	2. The plan recommends wilding conifers be controlled by Progressive Containment rather than Sustained Control, which is recommended for gorse & broom. We question why the control plan for wilding conifers would differ from the control plan for gorse and broom.	Question why the control plan for wilding conifers (Progressive Containment) differs from that proposed for gorse and broom (Sustained Control).	Wilding Conifers	Note	The progressive containment of wilding conifers is a national approach and ORC seeks to progressively reduce the distribution of wilding conifers over time.
P181.3	Wenita Forest Products Limited	We are concerned that Corsican Pine, another important commercial plantation species, is classified as a pest species (Table 15), which effectively prevents new planting of that species. The proposed plan states that Corsican Pine (among other names species) has a limited commercial value, which is incorrect. Corsican Pine is a species which is highly valued for the production of wooden posts and poles and it would be extremely regrettable if this species was lost to commercial plantation forestry in Otago as a consequence of this plan.	Remove Corsican Pine from the list of pest species.	Wilding Conifers	Reject	Corsican pine is declared a pest in other pest management plans, including in Canterbury, and ORC are seeking to be consistent with the national approach where appropriate. We heard evidence at the hearing and additional information on the commercial value of Corsican pine in the 1980s and 1990s was presented. However, the Panel did not find any compelling case for the removal of Corsican pine from the Plan given its adverse effects. It is declared as a pest in the Plan and this is consistent with other pest management plans, including in Canterbury, and ORC seeks to be consistent with the national approach.
P182.2	Federated Farmers of New Zealand	FFNZ supports the inclusion of wilding conifers in the RPMP. 5.The New Zealand Wilding Conifer Management Group developed a Management Strategy for wilding conifers in 2014. However, as this Strategy is non-statutory, it is appropriate to include wilding conifers in the RPMP to ensure there is regulatory oversight of activities to control these trees.  6.FFNZ commends the Otago Regional Council for the inclusion of a Good Neighbour Rule for wilding conifers. Early intervention with wilding spread is the most cost-effective method as it avoids much higher future costs as infestations spread and become denser. Increased control is needed to reduce the area of wilding conifer affected land and to stop their spread.  7.We support the removal of seed sources and appreciate the pragmatic transitional approach taken by council regarding shelter belts. This transition can be assisted by distributing The Right Tree for Your Place pamphlet produced by the New Zealand Wilding Conifer Management Group, which informs landowners what other species are suitable for planting.	Support the inclusion of wilding conifers and the transition approach to removing seed sources in the Plan.	Wilding Conifers	Accept	The submitter supports the inclusion of wilding conifers and the transitional approach to removing seed sources in the Plan.
P206.1	Mark Dowling	Submission on Wilding Conifers Our property has over 5km of boundary with a commercial forestry and we have been battling wildings for decades. We recognized the potential spread, but still had considerable expense to control wildings. We have been successful in achieving this. Ongoing control will still be necessary. I feel in the past the major emphasis has been on control of wildings. Looking to the future, we should also be looking at prevention of spread. The financial advantages of this are considerable. Landowners adjoining forestry plantations have gained considerable knowledge of wilding spread during the past decades and this knowledge should not be undervalued. My submission is that all plantations should have a margin of less spread-prone trees on the perimeter of their blocks. The theory here is that in a forest, most cones are produced on perimeter trees which have green crowns extending to ground level- as opposed to the smaller and higher canopies of internal trees. In addition, perimeter trees are more likely to scatter seed onto unplanted adjacent land. Therefore, if the margin of a forest is planted with a zero or less spread prone species, the risk of wilding spread is reduced. We are planning to fence and develop an area adjacent to the forestry as a preventative measure. If both parties can collaborate it will minimize the problem.	Forestry plantations should be required to maintain a margin of less spread-prone trees on the perimeter of forestry blocks.	Wilding Conifers	Reject	Although there is merit in this approach to manage wilding conifer spread, afforestation for plantation forestry purposes is regulated by the NES Plantation Forestry.
P257.1	City Forests Limited	Rules 6.3.4.1, 6.3.4.2, 6.3.4.3 The 10 years' duration of the plan will not be long enough to completely destroy all wilding conifers in all situations. In principle, a wilding pine is one that will spread, and adequate containment therefore needs to be regarded as an appropriate medium-term measure. We recommend that the wording is changed to "contained from further spread with appropriate plans in place to fully eradicate within a reasonable long-term timeframe", or similar.	The wording for Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 is changed to "contained from further spread with appropriate plans in place to fully eradicate within a reasonable long-term timeframe", or similar.	Wilding Conifers	Reject	The Plan does not seek to fully eradicate wilding conifers within 10 years, but to destroy them where publicly funded control works have been undertaken or to prevent spread across boundaries.
P258.12	Forest and Bird	Forest and Bird urges Council to include a rule in the PRPMP to provide for long term replacement or and preferably imminent removal of shelterbelt and small scale plantings where there is a wilding spread issue. The proposed biosecurity strategy provides only for interim action until there is a new rule. Shelter belts are a prime source of wildings and the longer they exist the further they exacerbate problems and create greater costs to rate payers.	A new rule is introduced providing for the long term replacement of, and imminent removal of, shelterbelt and small scale plantings with wilding potential.	Wilding Conifers	Reject	A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. The Panel considers that that the removing of shelterbelts and small scale plantings without a non-regulatory transitional period first would impact land occupiers that use these trees for stock shelter and other uses such as windbreaks. However, the Hearing Panel recommends an addition to the Strategy to require the compilation of a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.10	Queenstown Lakes District Council	Plan Rule 6.3.4.2 (page 47): We believe that complaints should not be restricted to the neighbouring landowner, and that other individuals should be able to report a breach of this rule. We suggest that the rule is amended 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".	Rule 6.3.4.2 is amended as follows: "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".	Wilding Conifers	Reject	This statement is recommended to be deleted in accordance with the relief sought in submission P121.10.
P263.11	Queenstown Lakes District Council	Plan Rule 6.3.4.3 (page 47): We suggest amending the rule 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" for the reasons given above.	Plan Rule 6.3.4.3 is amended as follows "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".	Wilding Conifers		This statement is recommended to be deleted in accordance with the relief sought in submission P121.10.
P263.12	Queenstown Lakes District Council	Point 7 Monitoring (page 82) Progressive containment programmes: We support the spatial reduction of wilding conifers, Contorta, Corsican, Scots, Mountain and Dwarf Mountain pines and /or Larch over the life of the Plan, and propose adding, "that monitoring occurs as a response to new populations that have been recorded" i.e. adding "as appropriate".	Point 7: Monitoring progressive containment programmes is amended as sought.	Wilding Conifers	Reject	The requested amendments to the 'anticipated results column' are not anticipated results and the method of monitoring is already set out in column 3 of the table. We sought further information from staff in Minute 6 and on receipt of this information the Panel is not of the view that additional specificity (in the form of targets within progressive containment programmes) as recommended by staff is required. We are satisfied that the Plan as notified provides enough certainty regarding the indicators, methods and frequency of monitoring and we are confident that the specific detail and information regarding each monitoring programme will be provided in the Operational Plan to be developed once the Plan is in place.
P263.4	Queenstown Lakes District Council	Organism declarations: Contorta pine (page 19) has an asterisk and a sub note '5'. The removal of sub note '5' would mean that rules still apply to this species as an unwanted organism. We suggest that Contorta is classified separately as an unwanted organism so that it cannot be kept in shelter belts or plantations.	Remove sub note '5' in relation to Contorta Pine.	Wilding Conifers	Accept	Contorta is an Unwanted Organism and sub note 5 has been removed from it.
P263.5	Queenstown Lakes District Council	Point 6.3.4 (page 45) Contorta (lodgepole) pine, Corsican pine, Scots pine, Dwarf Mountain pine, Mountain pine and Larch; the last paragraph could reiterate Contorta as an unwanted organism and reiterate the additional rules around the species.	Amend description of Contorta (lodgepole) pine, Corsican pine, Scots pine, dwarf mountain pine, mountain pine and larch to reiterate Contorta is an unwanted organism.	Wilding Conifers	Accept	This amendment would make it more explicit that contorta is an Unwanted Organism.
P263.6	Queenstown Lakes District Council	Page 45: Existing planted conifers in less than one hectare: Mature shelter belts containing wilding species need to be removed, as they continue to infest and populate land that has been cleared. We propose an addition to the last sentence; that Contorta and other pest plant shelter belts are removed and replaced with non-spreading wilding species within five years of the plan being adopted. The rationale for this lead-in period is to give landowners time to proactively plan and implement removal of the shelter belts.	Amend the plan to require removal and replacement of Contorta and other pest plant shelter belts with non-spreading wilding species within five years of the plan being adopted.	Wilding Conifers	Reject	A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. The Panel considers that the removing of shelterbelts and small scale plantings without a non-regulatory transitional period first would impact land occupiers that use these trees for stock shelter and other uses such as windbreaks. Some land occupiers may be able to address this quickly, however some are likely to need more than five years for this transition.
P263.7	Queenstown Lakes District Council	Plan rules 6.3.4.2 and 6.3.4.3: We note a recommended clearance area of 200m, but point out that 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 of low stature with no or light grazing.	No specific relief sought.	Wilding Conifers	Note	This submission is noted. The Panel is aware that the seed spread from some species can be considerable.
P263.8	Queenstown Lakes District Council	Plan rule 6.3.4 (page 46): We suggest an additional rule regarding existing shelter belts and plantations under one hectare, that the ORC works with landowners to replace or remove the wilding conifers within five years of the Plan becoming operative, where the shelter belt is sited next to vulnerable land. We propose that the definitions of vulnerable land include: Downwind vegetation cover is 1. Forest/shrubland/tussock/grassland with few gaps; 2. Open forest and/or scattered patches of dense shrubland/tussock/grassland with many gaps; 3. Open slips/rockland and/or light, low-stature shrubland/tussock/grassland. Downwind and use - grazing is: 1. Semi-improved grazing (sheep/cattle)/occasional mob stocking with sheep; 2. Extensive grazing only; 3. No grazing.	An additional rule is added, regarding existing shelter belts and plantations under one hectare, as sought, with consequential amendments to definitions.	Wilding Conifers	Reject	See response to submission P263.6.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P263.9	Queenstown Lakes District Council	Plan Rule 6.3.4.1 (page 47): The rule states that occupiers shall destroy all wilding conifers if (b) the control operations were publicly funded (either in full or in part). While this rule is positive for landowners already in the programme, we have concerns it may be perceived as a barrier to entering the programme if a landowner faces ongoing liabilities.	No specific relief sought.	Wilding Conifers	Note	The Panel agrees that this may be a risk in some cases, but that this risk is generally low. As the initial control cost is high and it is the initial control cost that is partially funded, it is in the best interest for land occupiers to keep cleared areas clear once control works have been undertaken. The Panel considers destroying any wilding conifers that seed prior to cone bearing following this work is more cost effective than not doing so, as the control costs in the future would be significantly higher.
P266.5	Jan Kelly	6.3.4 Wilding conifers. Progressive containment. We submit that wilding conifers are capable of growing at all altitudes in the conservation land, we have taken out several in the Reserve. These trees cannot be allowed to establish in either the Scenic Reserve or in conservation land adjacent. We agree with the assessment in the Plan, that "Wilding conifers can adversely affect amenity and landscape values, particularly where the valued landscapes are characterised by extensive low-stature vegetation such as high country tussock grasslands.." (p 44-45). While your analysis goes on to say "These landscapes are important for tourism", that is by no means the only value of the high country tussock lands where intrinsic natural value is a protected value in its own right. We support the view of the Council that the regional community will benefit when environmental values are protected through control of wilding conifers.	1. ORC to continue to remove wilding conifers wherever they occur, taking out seed trees and removing young trees in their first 6 -7 years before they are mature enough to seed. 2. We recommend that support for landowners' efforts is an essential part of this programme, including material help where it is clearly needed, where early intervention would be of high value. 3. We suggest the ORC keeps a schedule in the plan of coning ages for each cluster, so that wilding trees can be removed sequentially before they are old enough to set seed.	Wilding Conifers	Reject	ORC will continue to contribute to the National Programme and support land occupiers in the removal of wilding conifers. Where required by the rules in the Plan, wilding conifers should be removed regardless of the age of the trees and before they set seed.
P267.3	Arrowtown Village Association	We suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas fir, larch and radiata pine where identified as a wilding species.	Wilding conifers	Reject	Wilding conifer control in Otago is undertaken in accordance with the National Programme. See the response to submission P121.6 regarding conifer shelterbelts. Douglas fir, larch and radiata pine established by natural means are already identified as wilding conifers for the purpose of the Plan rules.
P267.4	Arrowtown Village Association	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan.	Wilding conifers	Note	ORC staff acknowledge the issues with wilding conifer spread in Otago and the need to work collaboratively and focus on long term efforts.
P268.3	Fiona Rowley	I suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas Fir, larch and radiata pine where identified as a wilding	Wilding conifers	Reject	See response to submission P267.3.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P276.10	Ministry for Primary Industries	Progressive containment programme for wilding conifers contorta, Corsican, Scots, mountain and dwarf mountain pines and larch: Support in part. The proposed plan lacks specifics on the reduction. MPI recommends the Plan include a measure in reduction over time.	MPI recommend that ORC include measures for this part of the plan, such as the following: Over {the duration of the Plan/an alternative prescribed timeframe}, to {contain/reduce} the geographic distribution of {wilding conifers and/or Contorta pine, Scots pine, Dwarf mountain pine, Mountain pine or European larch} {to specified area(s) or zone(s) / to X % of their current area/density (as at X date) / by X% within the region/specified area(s) or zone(s)} in order to reduce the adverse effects of wilding conifers on pastoral production, indigenous biodiversity, cultural and landscape values in the region.	Wilding Conifers	Note	ORC discussed this measure with MPI prior to notification and MPI's response at that stage was that setting a specific target may not be appropriate due to the changing nature of the National Programme. We sought further information from staff in Minute 6 and on receipt of this information the Panel is not of the view that additional specificity (in the form of targets within progressive containment programmes) as recommended by staff is required. We are satisfied that the Plan as notified provides enough certainty regarding the indicators, methods and frequency of monitoring and we are confident that the specific detail and information regarding each monitoring programme will be provided in the Operational Plan to be developed once the Plan is in place.
P276.11	Ministry for Primary Industries	Keeping clear areas clear is an important principle in achieving a progressive containment objective. Areas may be 'clear' of a pest for a number of reasons, such as due to specific control actions, particular land use activities, or the pest having not yet infested the area. Proposed Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 appear to aim to ensure that areas where wilding conifer control actions are undertaken will subsequently remain clear, and it appears that the parts of the region excluded from the proposed Wilding Conifer Containment Area are predominantly areas where the intensity and nature of land use will effectively prevent or minimise wilding conifer establishment. However, there are likely to be areas within the proposed Wilding Conifer Containment Area that are vulnerable to wilding conifer infestation, but which are currently clear of wilding conifers (or have only a very light, scattered presence). Given that the cost of wilding conifer control compounds significantly the longer any infestation is left uncontrolled, MPI is concerned that the proposed RPMP does not specifically address these clear but vulnerable areas. In such areas, a requirement that occupiers remove the pest prior to reproduction, can be an important 'regulatory back up' to other education and advocacy type principal measures aimed at preventing new areas of wilding conifer infestation and halting the cycle of new 'legacy' areas of wilding conifers being created. The potential for such a requirement to impose an inequitable burden on occupiers due to an uneven spread of invasions is minimal if it is applied in areas where there is a high confidence that the pest is either not present, or present in only very light numbers. It is also possible to provide for an 'alternative to compliance' type agreement within a rule, which allows an alternative, negotiated approach to wilding conifer control, in the case of uncertainty about the level of infestation in parts of the area to which the rule applies.	We encourage ORC to consider the addition of a rule or rules requiring occupiers to remove wilding conifers prior to cone-bearing within areas that are currently clear of wilding conifers, but are vulnerable to wilding conifer invasion. MPI suggests that Rules 1, 2 or 3A in the 2016 guidance document could potentially be used for this purpose.	Wilding Conifers	Note	ORC staff consider the rules in the proposed Plan an important first step in regulating wilding conifer control in Otago. These are generally consistent with the rules in the pest management plans for Environment Southland (proposed) and Environment Canterbury. We directed staff to provide further information in this regard in Minute 6 and having considered the additional information and analysis provided by staff we find that there is insufficient evidence to adopt the regulatory approach promoted by MPI, as part of this review process. No further written views were received from submitters in response to Minute 7. We therefore accept the recommended provisions put forward by staff.
P276.12	Ministry for Primary Industries	Existing planted conifer pest species: Landowners should be required to remove planted pest species within a specified time scale to protect the public investment in Control Programmes and to support the Plan's objectives.	The Plan should clarify how existing planted pest conifer species will be controlled to ensure they do not become a seed source for wildings.	Wilding Conifers	Reject	A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. Section 4.2 of the Strategy states that ORC will implement a transition programme for land occupiers for land containing contorta pine shelter belts and planted conifers under 1ha within the wilding conifer control areas. This will be established within two years.
P276.13	Ministry for Primary Industries	Population assessment as a result of inspections in accordance with the National Wilding Conifer Control Programme: Support; see earlier comments.	Support provision 6.3.4.	Wilding Conifers	Note	The submitter supports the progressive containment programme.
P276.14	Ministry for Primary Industries	Provisions 4, 5, 9.2.4 and 9.3.4. Support Good Neighbour Rules applying to pest conifers.	Support Good Neighbour Rules applying to pest conifers.	Wilding Conifers	Accept	The submitter supports the Good Neighbour Rule.
P276.5	Ministry for Primary Industries	Wilding Conifers: Wilding conifers are a significant pest management issue facing New Zealand and MPI is working closely with Regional Councils in managing wildings. MPI commends the Council for recognising the harm caused by Wildings and supports the Council's commitment to managing wildings in its region. MPI is pleased that the council addressed our pre-consultation feedback in relation to wilding conifers.	Support for Wilding conifer provisions.	Wilding Conifers	Accept	The submitter supports the wilding conifer provisions.
P276.8	Ministry for Primary Industries	Support the following organisms declared as pests Lodgepole pine (Pinus contorta), Corsican pine (Pinus nigra), Larch (excl. sterile hybrids), Mountain pine and dwarf mountain pine (Pinus uncinata Pinus mugo), Scots pine (Pinus sylvestris), and Wilding conifers.	Support.	Wilding Conifers	Accept	The submitter supports the inclusion of lodgepole pine, Corsican pine, larch, mountain pine and dwarf mountain pine, Scots pine, and wilding conifers.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P276.9	Ministry for Primary Industries	Wilding conifers often occur as a result of seed spread from planted conifer trees, and it can therefore be difficult to successfully control or manage the spread of wilding conifers over the long-term if planted seed sources are not removed or appropriately managed and contained. This is a complex and challenging issue without a single solution, and which requires different approaches for different types and species of conifer plantings that are effectively 'pest agents' (ie large plantations vs small plantings, shelterbelts, individual trees). It is anticipated that non-regulatory approaches will be appropriate and effective in many situations. However, there is the potential for scenarios to arise where the availability of a regulatory provision will be important in ensuring that valuable gains in wilding conifer control are not lost. For spread-prone but low value species, such as those referred to in section 2 above, this may be addressed through their specification as pests. For spread-prone but commercially valuable conifer species, the situation is considerably more complex. Nevertheless, given the level of wilding conifer control investment being made in the Otago region (both publicly and privately funded), the long-term 'security' of these control efforts would benefit considerably from the availability of a pest agent provision in this context.	MPI encourages ORC to explore the option of developing a pest agent rule applying to planted conifers in certain situations where they pose a significant risk of re-infesting areas that have been cleared of wilding conifers. For example planted Douglas Fir.	Wilding Conifers	Accept in part	We directed staff to undertake further analysis on the addition of a wilding conifer specific pest agent rule in Minute 6 as requested by submitters. Having considered the staff response to Minute 6 we agree there is merit in including a pest agent conifer rule and accept the proposed pest agent conifer rule as recommended. No further written views were received from submitters in response to Minute 7. We therefore accept the recommended provisions put forward by staff.
P282.3	Duncan Keenan	I suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas Fir, larch and radiata pine where identified as a wilding	Wilding Conifers	Reject	See response to submission P267.3.
P282.4	Duncan Keenan	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan.	Wilding Conifers	Note	See response to submission P267.4.
P283.3	Wakatipu Reforestation Trust	We suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas Fir, larch and radiata pine where identified as a wilding.	Wilding Conifers	Reject	See response to submission P267.3.
P283.4	Wakatipu Reforestation Trust	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan.	Wilding Conifers	Note	See response to submission P267.4.
P284.3	Peter Ripley	The benefit of managing wilding conifers by widespread progressive containment does not outweigh the costs. Wilding conifer control is based on subjective aesthetic grounds, cf Section 6.3.4, not on damage. Site-led containment is more cost effective, with local population having a say in this and contributing to it, since they also are who stand to benefit from it.	Limit wilding conifer control to site-led containment.	Wilding Conifers	Reject	The Cost Benefit Analysis undertaken to inform the Plan demonstrates that progressive containment programmes have the highest risk adjusted net benefit. However, this can be supported by site-led programmes in the future if necessary.
P285.1	Ernslaw One Ltd.	Table 15: characteristics of Corsican Pine. Corsican pine has previously supplied and to a lesser extent has continued to supply local sawmills and roundwood plants with framing grade logs, posts and poles. Many hundreds of houses in Otago and Southland will have Corsican framing timber in them, and many farm fence-lines will have Corsican posts supporting them. The species doesn't compete commercially in Otago/Southland coastal plantations where radiata pine and Douglas-fir are more commercially competitive. However, Corsican pine does compete commercially in Central Otago where radiata pine and Douglas-fir struggle.	The characteristics of Corsican Pine description is amended to reflect the species does have some commercial value.	Wilding Conifers	Reject	Corsican pine is declared a pest in other pest management plans, including in Canterbury, and ORC are seeking to be consistent with the national approach where appropriate. We heard evidence at the hearing and additional information on the commercial value of Corsican pine in the 1980s and 1990s was presented. However, the Panel did not find any compelling case to amend the Plan to reflect that the species has some commercial value. It is declared as a pest in the Plan and this is consistent with other pest management plans, including in Canterbury, and ORC seeks to be consistent with the national approach.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P285.2	Ernslaw One Ltd.	Oppose the proposal the Plan does not include rules requiring the removal of existing shelter belts and other existing planted conifers less than 1ha. Our submission is that having a "farmer exception" makes no sense as it is well established that wildings are sourced from three main areas: plantation forests, soil conservation plantings, and shelter belts/individual trees. Excluding areas less than 1 ha is kicking the can down the road and compromises work undertaken on larger target seed sources. An example of the folly of this exception is the eleven Corsican pine trees planted on farmland in 1928, 60 years before the adjacent compartments of Naseby forest were planted. These few trees seeded over hundreds of hectares in the Buster.	Oppose. The plan is amended to remove the exception for existing shelter belts and other existing planted conifers less than 1ha.	Wilding Conifers	Reject	See the response to submission P121.6 regarding conifer shelterbelts.
P285.3	Ernslaw One Ltd.	Plan Rule 6.3.4.2 and Plan Rule 6.3.4.3. Oppose the requirement that Occupiers shall destroy all wilding conifers...Corsican...present on land they occupy within 200m of an adjoining property. Our submission is that under the NES-PF, forest owners are to ensure that conifer plantations do not exceed a score of 12 as calculated by the wilding spread Risk Calculator (DSS1). Having a 200m distance complicates these requirements, since a stand of Corsican could be within 200m of a neighbouring property but with a score less than 12, and acceptable under the NES-PF. This would make these two rules redundant.	Plan Rule 6.3.4.2 and Plan Rule 6.3.4.3. Oppose the requirement that Occupiers shall destroy all wilding conifers...Corsican...present on land they occupy within 200m of an adjoining property.	Wilding conifers	Reject	Corsican pine is declared a pest in other pest management plans, including in Canterbury, and ORC are seeking to be consistent with the national approach where appropriate. We heard evidence at the hearing and additional information on the commercial value of Corsican pine in the 1980s and 1990s was presented. However, the Panel did not find any compelling case for the removal of Corsican pine from the Plan. It is declared as a pest in the Plan and this is consistent with other pest management plans, including in Canterbury, and ORC seeks to be consistent with the national approach.
P306.3	Stephanie Ripley	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.	Limit wilding conifer control to site-led containment.	Wilding conifers	Reject	The Cost Benefit Analysis undertaken to inform the Plan demonstrates that progressive containment programmes have the highest risk adjusted net benefit. However, this can be supported by site-led programmes in the future if necessary.
P312.10	Land Information New Zealand	Plan Rule 6.3.4.3: 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.	1. Amend the wording of Plan Rule 6.3.4.3: 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 – a) the adjoining land has previously been cleared through control operations since January 2016; and b) 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.	Wilding Conifers	Reject	The phrase 'taking reasonable steps to manage' is directly from the National Policy Direction 2015, and is a requirement of a Good Neighbour Rule.
P312.11	Land Information New Zealand	LINZ submits that a pest agent rule is required to implement progressive containment and reduction in the geographic distribution and extent of wilding conifers. Add a pest agent rule to Section 6.3.4 Note: This is a pest agent rule "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 – a) 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 b) the control operations were publicly funded (either in full or in part). [continued in submission point 312.12].	Add a pest agent rule to Section 6.3.4.	Wilding conifers	Accept	The Panel find there is merit in the inclusion of the proposed rule provided there is no conflict with the NES Plantation Forestry. The Panel directed staff in Minute 6 to provide further information and undertake a cost benefit analysis and on receipt of this information recommend the pest agent rule is added to the Plan.



Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P312.12	Land Information New Zealand	LINZ submits that a pest agent rule is required to implement progressive containment and reduction in the geographic distribution and extent of wilding conifers. Add a pest agent rule to Section 6.3.4 [continueds from submission P312.11] ...A breach of this rule creates an offence under section 154N(19) of the Act. 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. 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.	Add a pest agent rule to Section 6.3.4.	Wilding conifers	Accept	See response to submission P312.11.
P312.2	Land Information New Zealand	Definition of 'wilding conifer', and Table 3 – introduced conifer trees: 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 Pinus radiata and Douglas fir in Table 3. 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.	Retain the definition of 'wilding conifer', and the list of introduced conifer trees in table 3	Wilding conifers	Note	The definition of wilding conifer is supported.
P312.9	Land Information New Zealand	Section 6.3.4 Progressive containment programme for wilding conifers, contorta, Corsican, Scots, mountain and dwarf mountain pines and larch: 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. 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.	1. Retain Plan Objective 6.3.4 and Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3.	Wilding Conifers	Accept	The submitter supports Plan Objective 6.3.4 and Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3.
P313.3	Carrie Pritchard	I suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas Fir, larch and radiata pine where identified as a wilding	Wilding conifers	Reject	See response to submission P267.3.
P313.4	Carrie Pritchard	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan.	Wilding conifers	Note	See response to submission P267.4.
P315.3	Andrew Davis	I suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas Fir, larch and radiata pine where identified as a wilding.	Wilding conifers	Reject	See response to submission P267.3.
P315.4	Andrew Davis	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan.	Wilding conifers	Note	See response to submission P267.4.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P318.3	Ben Teele	I suggest that council identifies species of conifer identified as wilding within the five separate districts. Douglas Fir, while a forestry species in some other parts of the country, is one of the most significant wilding trees in the Queenstown Lakes District. As such it should be classified as a wilding species within the Queenstown Lakes District. Shelterbelts and windbreaks should not be excluded from the definition of wilding conifers, as they still actively contribute to extensive seed rain. ORC should work with private landowners to look at replacement plantings more rapidly than currently proposed under the biosecurity strategy. Appropriate objectives and rules also need to be included.	District specific classification of wilding conifers with appropriate rules and objectives. Accelerate the replacement of conifer shelterbelts. Modify objective 6.3.4 to include the destruction of Douglas fir, larch and radiata pine where identified as a wilding species.	Wilding conifers	Reject	See response to submission P267.3.
P318.4	Ben Teele	ORC, responsible for Otago's pest management strategy, needs to prioritise their control. Central government has also started to realise the threat of wilding spread. ORC needs to become a leader in this field, and look to solve the wilding issue through collaboration, support, and leadership rather than focusing on intermittent efforts. More funding and emphasis on control of wilding conifers through the GNR and ORC as a leading body needs to occur. In the next ten year plan, ORC should look to move wilding control from Progressive Containment to Eradication.	Shift from progressive containment to eradication in the next 10yr plan	Wilding conifers	Note	See response to submission P267.4.
P326.1	Wakatipu Wilding Conifer Control Group (WCG)	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.	Clarification of meaning of asterix and subnote in relation to Contorta.	Wilding conifers	Accept	As contorta is an Unwanted Organism, sub note 5 has been removed from it.
P326.10	Wakatipu Wilding Conifer Control Group (WCG)	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. WCG request that ORC increase their resourcing for environmental monitoring and compliance of wildings across Otago.	Increase resources for monitoring of wilding conifers particularly in response to new populations	Wilding Conifers	Note	This is an implementation matter and ORC will continue to work closely with the WCG regarding monitoring.
P326.11	Wakatipu Wilding Conifer Control Group (WCG)	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	ORC should take an education and advocacy lead	Wilding Conifers	Note	This is an implementation matter and ORC intends to take a greater role in information and advocacy. ORC intends to develop a 'pest hub' as an on-line resource for land occupiers, and to develop guidance material on identifying other wilding trees within Otago in addition to wilding conifers, and produce guidance on control and replacement species. These are set out as priority actions in Section 4.2 of the Strategy.
P326.12	Wakatipu Wilding Conifer Control Group (WCG)	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 point 6.3.4 of the plan.	No specific relief requested	Wilding Conifers	Note	The importance of ORC involvement in the WCG is acknowledged.
P326.2	Wakatipu Wilding Conifer Control Group (WCG)	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.	Clarify that Contorta is an unwanted organism	Wilding conifers	Accept	This amendment would make it more explicit that contorta is an Unwanted Organism.
P326.3	Wakatipu Wilding Conifer Control Group (WCG)	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.	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.	Wilding conifers	Reject	See response to submission P121.6.
P326.4	Wakatipu Wilding Conifer Control Group (WCG)	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.	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.	Wilding conifers	Note	This submission is noted. The Panel is aware that the seed spread from some species can be considerable.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P326.5	Wakatipu Wilding Conifer Control Group (WCG)	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	Add new rule that ORC will work with landowners to replace or remove wilding conifers within 5 years of this plan becoming operative, where the shelter belt is sited next to vulnerable land.	Wilding conifers	Reject	See response to submission P121.6.
P326.6	Wakatipu Wilding Conifer Control Group (WCG)	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 Otago RPM Strategy 2009: Total control in the Lakes district area; Occupiers must destroy all Pinus Contorta on their land.	Addition of new rule for Contorta Pine as an unwanted organism.	Wilding conifers	Reject	Contorta is an Unwanted Organism and therefore sections 52 and 53 of the Biosecurity Act apply. Therefore contorta cannot be planted, propagated or sold. Minor amendments have been recommended to the Plan to make this clearer.
P326.7	Wakatipu Wilding Conifer Control Group (WCG)	Plan rule 6.3.4.1 page 47. 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	Support in part.	Wilding conifers	Note	The Panel agrees that this may be a risk in some cases, but is of the view that this risk is generally low. As the initial control cost is high and it is the initial control cost that is partially funded, it is in the best interest for land occupiers to keep cleared areas clear once control works have been undertaken. We sought additional information from Staff in Minute 6 and having discussed the issues at length the Panel consider destroying any wilding conifers that seed prior to cone bearing following this work is more cost effective than not doing so, as the control costs in the future would be significantly higher.
P326.8	Wakatipu Wilding Conifer Control Group (WCG)	Plan rule 6.3.4.2 & 6.3.4.3 Page 47 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, <u>agency, or Community group involved in wilding control.</u>  Reason – this should not be restricted to the neighbouring landowner, other individuals should be able to report a breach of this rule.	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.	Wilding conifers	Accept in part	The Statement is recommended to be deleted in accordance with the relief sought in submission P121.10.
P326.9	Wakatipu Wilding Conifer Control Group (WCG)	Monitoring (page 82) - 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.	Collaborate with stakeholders for monitoring purposes.	Wilding Conifers	Note	This is an implementation matter and the Panel notes that ORC staff will discuss a collaborative approach to monitoring with WCG outside the Plan process.
P328.3	Josie Harris	6.3.4 Wilding Pines - 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 and therefore should be planting native barriers around all areas subject to downwind seed dispersal. I oppose the use of poison to control wilding pines.	Contain wilding pines by planting natives, not using poison.	Wilding Conifers	Note	The wilding conifer rules in the Plan require people to control wilding conifers on land they occupy. How the land occupier controls that pest is the land occupier's responsibility. Planting natives, and the use of poison are two methods of a suite of methods that can be used to control wilding conifers and the most appropriate control method is dependant on the density of infestation, site constraints and control costs.
P333.4	Environment Southland Regional Council	ES 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.	Clarification requested.	Wilding Conifers	Note	Plan Rules 6.3.4.1, 6.3.4.2 and 6.3.4.3 all focus on the destruction of plants prior to cone bearing, provided the criteria in the Rules are met. The exclusion for existing planted conifers of less than 1ha has been provided to recognise the animal welfare and primary production benefits of smaller lots of existing planted conifers, particularly where these form shelter belts. Transition arrangements to non-spreading species for existing shelter belts are outlined in the Strategy.
P335.23	Barrie Wills	In relation to [Table 15] consider using appended images prepared in 2004 for DoC wilding control promotion. The problem was actually recognised in the early 1980's but never fully translate into ORC policy until this draft PMS, so 25+ years of possible economic control measures down the drain.	Consider using images appended to submission.	Wilding conifers	Reject	Table 15 contains three images of wilding conifers.
P335.24	Barrie Wills	In relation to [Table 15] note also susceptibility of shallow rooted conifers to mass wilding blow, and substantial stem breakage under winter snow conditions. Mature P. radiata have also succumbed to sub-zero freezing conditions in Central Otago.	Note also susceptibility of shallow rooted conifers to mass wilding blow, and substantial stem breakage under winter snow conditions.	Wilding conifers	Reject	Table 15 is a summary of wilding conifers and their effects and the Panel does not consider the addition requested is not necessary.

Sub point	Submitter	Submission Summary	Relief	Category	Recommendation	Reasons
P335.25	Barrie Wills	In relation to [Table 15] Can reference be made to policy covering inappropriate commercial planting of conifer spp (e.g. the Lake Onslow/Teviot fiasco) on ecologically sensitive sites to provide a means of supporting District Planning in preventing this sort of exploitation, particularly where they might encroach on Outstanding Natural Areas. Not only have those trees never undergone any silvicultural treatment and therefore are of questionable economic value, but they are also increasingly responsible for wilding spread onto adjacent properties, for introducing broom and gorse during planting, and they now harbour animal pests like pigs. Where commercial plantations exist, rules need to cover the responsibility for control of wilding spread directly attributable to those trees.	Include reference to commercial planting of conifers including rules to cover the responsibility for control of wilding spread that is directly attributable to those trees.	Wilding conifers	Reject	The commercial planting of forestry species is regulated by the NES Plantation Forestry.
P335.26	Barrie Wills	In relation to [Plan Rule 6.3.4.3] 200m seems an entirely inappropriate distance given the ability for wilding conifers to widely disseminate seed. 1km would be a considerably more effective distance (and might assist in having those wildings in the Pigroot removed).	Amend Rule 6.3.4.3 to require 1km.	Wilding conifers	Reject	The distance specified in Rule 6.3.4.3 is consistent with other regional councils, including Environment Southland and Environment Canterbury.
P335.5	Barrie Wills	No reference to those organisms in Table 3 in introductory section text. While wildings are referred to in Table 2, make it clear what their status is in this context, and explain why some occur in both tables. Also make cross-reference to Section 6.3.4 on wildings. Make it clear what the status of these is? Pests or otherwise? Is not obvious why several of these are repeated in a separate Table. Long overdue to have these species in the PMP - I had suggested several of the be included in ORC's very first PMS attempt. Time is money dealing with rampant pests like these.	Make it clear what the status of these is? Pests or otherwise? Is not obvious why several of these are repeated in a separate Table.	Wilding conifers	Reject	Wilding conifers are defined in sub note 3 at the bottom of Table 2. These differ from the conifer species specifically set out in Table 2 which include planted trees.
P338.7	Kawarau Station Limited	Wilding Pines - We have been part of this programme since the Wakatipu group were formed. Again using this Area as a buffer especially in the Roaring Meg.	No specific relief requested.	Wilding Conifers	Note	No specific relief is requested. The submitter's information regarding wilding conifer control in this area is noted.
P340.3	Terry Drayton	Oppose the inclusion of wilding conifers. In Central Otago they are the few species that actually grow to encourage biodiversity. Use them for firewood, oil, animal shelter & rainshadows. Hold soil together.	Oppose the inclusion of wilding conifers in the Plan.	Wilding Conifers	Reject	Wilding conifers have adverse effects on biodiversity and habitat, soil hydrology and landscape values. These adverse effects of wilding conifers are outlined in table 15 of the Plan.
P341.1	R L Wilson & R T Redneck	About 25 years ago, after receiving the annual broom and gorse letter, I wrote to ORC suggesting that the weed infested gravel pits should be cleaned up and kept weed free to prevent seeds being spread with the gravel used for road maintenance. I did get a reply stating that it would not be cost effective. About the same time a campaign to rid Alexandra's Tucker Hill of pine trees began. 25 Years on the pines are gone. The thyme is so thick only broom can compete. Ten years from now Alexandra will have a yellow background just like Roxburgh which is now keeping ahead by allowing acres of buddleia to infest the tailings and many creek beds nearby. May I suggest that you be a bit lenient on managed pine trees planted on farmland for shelter as most wilding pines are found on unmanaged land. A stitch in time saves nine. One years seeding seven years reading [refer poem: the pine trees point of view].	Consider being more lenient on managed pine trees.	Wilding Conifers	Accept	A non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is provided in the Plan and Strategy. The Hearing Panel recommends an addition to the Strategy to require the compilation of a registry of shelterbelts across the Region that may act as seed sources and prepare maps to record spatially existing shelterbelt locations and at-risk areas. This would provide a baseline from which to set up a detailed surveillance programme and future reporting on the overall success of the programme.

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on preparation for hearing of submissions**

**[Minute 1]**

**INTRODUCTION**

1. At its meeting on 31 October 2018 the Otago Regional Council (Council) under clause 32 of Schedule 7 of the Local Government Act 2002 appointed us as the Hearing Panel on the Proposal for an Otago Regional Pest Management Plan and the proposed Biosecurity Strategy.
2. The Council delegated to us the power, functions, and duties of the Council set out in:
  - a) Sections 72 to 74 (excluding section 72(5)) and sections 100D(6)(b) of the Biosecurity Act 1993 (the Act), in respect of the Proposal; and
  - b) Sections 75(1) and (2) of the Act to prepare a written report on the Plan.
3. These include the powers, functions and duties of hearing submissions, and of making recommendations to the Council on the Otago Regional Pest Management Plan, and to make recommendations on the Biosecurity Strategy.
4. The members of the Hearing Panel are:
  - a) Cr Gretchen Robertson (Chair)
  - b) Cr Ella Lawton
  - c) Cr Andrew Noone
  - d) Mr John Simmons

**NOTICE OF HEARING**

5. Notice is given that a hearing by the Council has been set to consider an Otago Regional Pest Management Plan and Biosecurity Strategy and submissions received.
6. Submitters will be given notice of the hearing by email or letter which informed them of the time and location of the hearing and the process to follow if they wished to speak to their submission.
7. The dates and venues for the hearing of submissions are set out below. Sitting times for the hearing are 9.00 am – 4.30 pm.

Date: 4 to 7 June  
Location: Dunedin  
Venue: ORC Council Chamber

Date: 17 to 18 June  
Location: Queenstown  
Venue: Queenstown Lakes Council Chamber

8. Notice is also given that staff will present a response to submissions and a response to any additional questions from the hearing panel to be made available on the website at the conclusion of the hearing, the date to be determined by the Panel.

9. **DECISION ON ACCEPTANCE OF LATE SUBMISSIONS**

10. The following 14 submissions were received by the Council after the date for making submissions closed on 5pm 14 December 2018.

- a. Linda Mulholland
- b. Cardrona Residents and Ratepayers Society Inc
- c. SPCA
- d. George Collier
- e. Blackstone Hill Ltd
- f. Aspiring Biodiversity Trust
- g. Peter Dowden
- h. Lake Dunstan Aquatic Weed Management Group
- i. Josie Harris
- j. Wakatipu Wilding Conifer Control Group
- k. Alex Kerr
- l. Donna Suzanne Tomkin
- m. Kāi Tahu ki Otago (submission on the Plan)
- n. Kāi Tahu ki Otago (feedback on the Strategy)

11. Kāi Tahu ki Otago provided advance notice to Council that they wished to provide a late submission. No Notice of Hearing had been issued and directions for the filing of evidence had not yet been made.
12. Section 72(1)(c) of the Act requires us to be satisfied that if there are tangata whenua of the area who may be affected by the Plan, they have been consulted. The Council has identified that the interests of the Kāi Tahu ki Otago may be affected by the Plan, and therefore should be consulted. We are also required to be satisfied under Section 72(1)(d) of the Act that, if consultation with other persons is appropriate, sufficient consultation has occurred.
13. We consider that the acceptance of the late submissions will assist in meeting the requirement of the Act and that no persons will be prejudiced by the late filing of these submissions.
14. Accordingly, the Panel accepts the Late submissions as valid submissions. This means that these submissions will be included in the summary of submissions in accordance with the Panel's directions set out below.

## **DIRECTIONS**

15. This Minute sets out the Panel's directions for the conduct of the public hearing.

### **Staff Report**

16. Council staff are directed to prepare a Staff Report containing:

- a) A summary of the Plan and Strategy;
- b) A summary of the process undertaken to develop the Plan and Strategy;
- c) A summary of the legal framework in the Biosecurity Act 1993 (the Act) for making a Regional Pest Management Plan;
- d) A summary of the consultation requirements in section 72 of the Act for making a Regional Pest Management Plan and the consultation undertaken during the development of the Plan and Strategy;
- e) A summary of the submissions received on the Plan and feedback provided on the Strategy, highlighting key issues raised in submissions and feedback, and providing staff recommendations in response to each submission.

17. The staff report will be made available on the website by 5pm on 10 May.

### **Website**

18. All information relevant to the hearings will be made available on the Council's website:  
<https://yoursay.orc.govt.nz/pestplan>

19. Submitters who wish to be heard are advised to view that information on the website.

### **Service on the Council**

20. Any information or evidence required by this Minute, and any memorandum or application to the Hearing Panel, may be lodged:

- a. In writing, addressed to Otago Regional Council, Private Bag 1954, Dunedin 9054 marked for the attention of Hearing Administrator Janet Favel.
- b. By delivery to Otago Regional Council, 70 Stafford Street, Dunedin, marked for the attention of Janet Favel.
- c. By email to [pests@orc.govt.nz](mailto:pests@orc.govt.nz).

### **A Hearing Schedule**

21. A Hearing Schedule will be e-mailed or posted to submitters and posted to the website showing the location, date, sequence and time allocation granted to each submitter.

Videoconferencing facilities will be made available to those submitters who indicate in advance that they require these facilities.

22. Submitters will be allocated 15 minutes to speak to their submission and/or call evidence. Submitters requesting more time can be allocated 30 minutes as the hearing schedule permits.
23. Additional time allocations will be set in light of the content of each submitter's submission, evidence (if any) and the time estimate and reasons provided by the submitter.

#### **Provision of written evidence**

24. To allow for the Hearing Panel to read the evidence prior to the hearing, submitters who intend to call or give evidence are to provide a written statement of the evidence of each witness so that it is received by the Council **by 5pm on 24 May** prior to their hearing date. Please note that this applies to all written evidence, including both expert and lay evidence. Due to the limited timeframes extensions to this date will not be granted.
25. It is noted that if lay persons wish to present evidence but do not wish to prepare a written statement of evidence, they may attend the hearing and make an oral presentation within the time allocation specified.
26. This timetable is established because the Hearing Panel considers that the scale and significance of the public hearing makes this direction appropriate. The statements of evidence will be posted on the website.

#### **The Hearing Procedure**

27. The Hearing Panel will read submissions and evidence in advance, and take such materials as read, so time allocations can be set to allow submitters to provide an executive summary of their submission and/or provide evidence in response to new issues and/or provide rebuttal evidence.
28. Submitters will not be permitted to cross-examine witnesses. The Hearing Panel may question submitters and witnesses.

#### **Evidence Recording**

29. An audio record of the hearing will be maintained and made available to submitters on the website.
30. Excerpts from the audio record may be transcribed, if appropriate, where the Panel requires it or receives an application and makes a direction for transcription.

#### **Acknowledgement of Potential Conflict of Interest**

31. Having reviewed a list of submitters, the Hearing Panel have identified those submitters with whom the Hearing Panel have had current or previous associations.

Cr Robertson

- Part owner of forestry block.



- Husband works for Ernslaw One, was not involved in Ernslaw's submission.

Cr Lawton

- Has forestry shares – not part of any submitter groups.

Mr Simmons

- Past associations with MPI, DOC, LINZ, ECan and Environment Southland.
- Member of NZ Farm Forestry Association, NZ Biosecurity Institute, NZ Association of Resource Management, and NZ Institute of Directors.

32. The Hearing Panel is satisfied, subject to any matters submitters might raise, that any perceived conflicts of interest can be dealt with by this disclosure, and there is no need for any Panel member to recuse themselves from considering and determining any of the submissions.
33. If any submitter takes a different view, or wishes to raise additional matters, they are to alert the Council as a matter of urgency.

ISSUED by the Hearing Panel

29 April 2019

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on potential conflicts of interest**

**[Addendum to Minute 1]**

**INTRODUCTION**

1. Panel Minute 1 was issued on 29 April 2019.
2. Paragraphs 31 – 33 of Minute 1 acknowledged potential conflicts of interest.
3. This Addendum to Minute 1 further identifies those submitters with whom the Hearing Panel have had current or previous associations.

**Acknowledgement of Potential Conflict of Interest**

4. Declaration - Cr Andrew Noone.

*During a recent exchange of emails it was brought to my attention that responses had been sent from my Dunedin City Council email address. Both my iPhone and iPad default to the DCC address when I reply to emails after opening them in the 'All Inboxes'. This is now no longer the case.*

*The reason for having a DCC email address is because of my appointed role as Deputy Chairman of the Dunedin District Licensing Committee, an independent committee of Council with DCC staff support.*

*The DCC is a submitter in the Proposed Pest Management Plan and Biosecurity Strategy process. I declare that, I played no part in the formation of the Dunedin City Council submission.*

5. Declaration – Cr Gretchen Robertson

*I, Gretchen Robertson, declare that my brother, Dylan Robertson, is a submitter (submission number 157). I was not involved and did not have any interaction with him on this submission and will stand aside for any consideration or deliberation on it.*

6. The Hearing Panel is satisfied that any perceived conflicts of interest between Cr Andrew Noone and the Dunedin City Council can be dealt with by this disclosure.
7. the Panel agrees that Cr Robertson will vacate the Chair and excuse herself from considering and determining the submission of Dylan Robertson during the deliberations phase.

ISSUED by the Hearing Panel

25 JUNE 2019

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on potential conflicts of interest**

**[Addendum 2 to Minute 1]**

**INTRODUCTION**

1. Panel Minute 1 was issued on 29 April 2019.
2. Paragraphs 1-5 of Minute 1 acknowledged the power, functions and duties of the Council delegated to the Hearing Panel as set out in:
  - a) Sections 72 to 74 (excluding section 72(5)) and sections 100D(6)(b) of the Biosecurity Act 1993 (the Act), in respect of the Proposal; and
  - b) Sections 75(1) and (2) of the Act to prepare a written report on the Plan.
3. These include the powers, functions and duties of hearing submissions, and of making recommendations to the Council on the Otago Regional Pest Management Plan, and to make recommendations on the Biosecurity Strategy.
4. This is the second addendum to Minute 1 and acknowledges the further delegation to the Hearing Panel by the Council under clause 32 of Schedule 7 of the Local Government Act 2002.

**DELEGATED AUTHORITY TO CONSIDER WRITTEN VIEWS RECEIVED FROM PROPERTY OCCUPIERS**

5. At its meeting on 1 August 2019 the Otago Regional Council:
  - a. Noted that the Hearings Panel has determined in accordance with section 72(4) of the Biosecurity Act 1993 that further consultation on the Proposed Regional Pest Management Plan be undertaken with property occupiers affected by the proposed extension to the Gorse and Broom Free Areas in the Cardrona Valley;
  - b. Resolved in accordance with section 72(5) of the Biosecurity Act 1993 that consultation be undertaken by informing the property occupiers in writing of the proposed extension to the Gorse and Broom Free Areas and giving the property occupiers an opportunity to provide their views in writing;
  - c. Delegated to the Hearing Panel (acting under clause 32 of Schedule 7 of the Local Government Act 2002) the necessary powers, functions and duties under the Local Government Act 2002 and Biosecurity Act 1993 to consider any written views received from the Property Occupiers as part of its recommendations to Council as to the Council's decision on the proposed regional pest management plan.

ISSUED by the Hearing Panel  
2 AUGUST 2019

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on preparation for hearing of submissions**

**[Minute 2]**

**INTRODUCTION**

1. On Friday 10 May 2019 the Hearing Panel received a request from Otago Regional Council to formally extend the date the Staff Report (as set out in paragraphs 16 and 17 of Minute 1) is to be made available on the website to 5pm 14 May 2019.

**CONSIDERATION OF EXTENSION**

2. The Hearing Panel have considered the requested extension for time for the Staff Report and consider that no person will be unduly prejudiced to the proposed extension for the following reasons:
  - The extension seeks an additional two working days which will have no impact of the timing for the hearing;
  - An extension to the provision of evidence by submitters will also be provided so that submitters who intend to give or call evidence will not be prejudiced.

**DIRECTION ON STAFF REPORT AND PROVISION OF SUBMITTER EVIDENCE**

**Direction on Staff Report:**

The Staff Report (as set out in paragraph 16 of Minute 1) will be made available on the website by **5pm 14 May 2019**. Due to the limited timeframes no further extensions to this date will be granted.

**Direction on submitter evidence:**

Submitters who intend to call or give evidence are to provide a written statement of the evidence of each witness so that it is received by the Council **by 5pm on 28 May** prior to their hearing date. Please note that this applies to all written evidence, including both expert and lay evidence. Due to the limited timeframes extensions to this date will not be granted.

All other directions in Minute 1 regarding the hearing remain unchanged.

ISSUED by the Hearing Panel

13 May 2019

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on key matters arising from submissions**

**[Minute 3]**

**INTRODUCTION**

1. This is the third Minute of the Hearing Panel.
2. The Panel would like to thank staff for the Hearing Report and associated documentation (provided in response to the directions in Minute 1) and submitters for attending and presenting submissions on Wednesday 5 June and Thursday 6 June.
3. This Minute sets out some key questions that have arisen from the review of the staff Hearing Report and submissions to date which will assist us with our consideration of the proposed plan and strategy.
4. We also issue a reminder notice of the remaining hearing days to be held in Queenstown Monday 17 June and Tuesday 18 June.

**KEY MATTERS ARISING**

5. We set out below our key questions arising from the review of submissions and the staff report to date. This is not intended to be an exhaustive list and we are likely to have further questions that may be addressed in the course of the hearing.
6. The following questions will assist staff and submitters in their preparation for the hearing on Monday 17 June and Tuesday 18 June. It does not limit the matters on which either the Council or submitters may present.
  - a. We heard the submission made by Land Information New Zealand (LINZ) (represented by Marcus Girvan, Project Manager, LINZ biosecurity) that Egeria (*Egeria densa*) and Hornwort (*Ceratophyllum demersum*) be classified as exclusion pests and added to Table 2 of the PRPMP and that the primary programme for these species should be exclusion from the Otago region. We ask the submitter and staff to provide further information on the nature and occurrence of pathway spread of these freshwater species by boat users between regions and risk of transfer into Otago.
  - b. We ask staff to comment on how the Council might best manage Egeria (*Egeria densa*) and Hornwort (*Ceratophyllum demersum*) in the plan.
  - c. We heard submitter presentations relating to wilding conifers and seek further clarity on the tension/relationship between the NPS for Plantation Forestry 2017 and the PRPMP, and other regional/district planning documents. Specifically, can more information be provided by staff on the following matters:

- the integration of the NPS for Plantation Forestry 2017 within planning documents and any inconsistency with TLA plans
  - relevant matters of discretion where resource consent is required at TLA level and in determining activity status; including how TLAs apply the wilding tree risk calculator, erosion susceptibility, classification and set back distances
  - regarding the general clearance rules, further clarity on landowner responsibilities after government funding for clearance has occurred versus landowner responsibilities after privately funded clearance has occurred.
  - the enforceability of Rule 6.3.4.4 Good Neighbour Rule
  - what is the pest agent status of wilding conifers, in particular, radiata pine *Pinus radiata* and douglas fir *Pseudotsuga menziesii*, and further information on the approach of other regional councils with regard to these species as pest agents, including Environment Canterbury and Environment Southland
- d. We note a clear theme to emerge during the hearing was the definition of feral cats. We would like further information from staff on other definitions available and invite staff to make reference to Greater Wellington’s definition as promoted by Sue Maturin (Forest and Bird) to be a more effective and simpler definition that would close the perceived ‘loop-hole’ whereby people can feed feral cats.
- e. We seek further information from the Maniototo Pest Management Inc to support its request to vary from using McLean Scale 3 as the trigger point for non-compliance. We would like to see any evidential data that would establish the grounds on which the request is made. In doing so, the Panel invites the group to reference Part 2 of the CBA document<sup>1</sup> which addresses the method for analysis of Rabbit Options pp13-19 (relevant excerpts attached to this Minute).
- f. Can staff provide comments on the request by the Maniototo Pest Management Inc - where a group requests a variation to the requirement to meet the McLean Scale 3 in favour of McLean Scale 4 as a trigger point to non-compliance action, can the desired outcomes be achieved?
- g. We ask staff to comment on the enforceability of Rule 6.4.6.2 Good Neighbour Rule.
- h. We note general submitter concerns that because of the work achieved under the OSPRI programme and volunteer groups to control possum numbers in Otago there exists an opportunity to sustain the control programme and build on the gains made via the OSPRI work. Can information be provided by staff on whether it would be appropriate to include a stronger post-OSPRI control measure in the plan?
- i. We ask staff to comment on whether they considered using the residual trap catch index as part of the regulatory control programme post OSPRI as part of a landowner rule?

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<sup>1</sup> **Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits.** A report prepared for Otago Regional Council as part of the preparation of a Regional Pest Management Plan, October 2018 available at <https://yoursay.orc.govt.nz/pestplan>.

- j. Can staff provide further information on landowner-led possum control programmes in other regions, for example in the Hawkes Bay Region.
  - k. We note the consistent submitter concern that the plan does not propose occupier control rules as a measure within site-led programme areas and submitter requests for additional rules to provide regulatory 'back up'. Can staff respond to the following:
    - What changes to the proposed rules are needed for site led programmes to be enforceable?
    - Is the current process for adding site led programmes into the plan sufficiently responsive and is a stronger stance required?
    - what is done in the urban/peri-urban space and relationship with TLA planning frameworks?
  - l. We note submitter requests for ORC support in implementation, including operational support, technical leadership, facilitation, and co-ordination. We specifically note that some submitters seek leadership on control methodology, techniques, and how to use pesticides / herbicides efficiently and effectively. Can staff provide further information on the role of Council in providing technical leadership and the sharing of technical knowledge e.g. in relation to the effective and safe use of chemical agents.
  - m. We are mindful that the ORC has legal responsibilities when advising (both internally in the organisation itself and for the provision of guidance for external users). Can staff comment on Council's legal responsibilities in this regard?
7. **We direct the Council** respond to the questions in writing and to make this available by 5pm 14 June 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
8. **We direct Land Information New Zealand (LINZ)** to provide the additional information requested in 6(a) above and to make this available by 5pm 14 June 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
9. **We direct Maniototo Pest Management Inc.** to provide the additional information requested in 6(e) above and to make this available by 5pm 14 June 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
10. We provide a reminder notice of the dates and venues for the hearing of submissions as set out below.

Date: Monday 17 June 1.00-4.30pm  
Tuesday 18 June 10.30am-12.00pm  
Location: Queenstown  
Venue: Queenstown Lakes Council Chamber

**ISSUED by the Hearing Panel**

**10 June 2019**

modelling was undertaken for each pest, with the method for each of the animal pests described within the section.

## 2 Rabbits (Feral)

### 2.1 Description

Rabbits were first released in the 1800s and soon became a significant agricultural pest as well as affecting native tussock ecosystems. Mustelids and cats were brought in an attempt to control rabbits but had little impact on rabbits but significant impact on native birdlife and other fauna. Rabbits survive best in dry and semi-arid environments, where although their reproduction rate is lower than in more productive agricultural environments, mortality is significantly lower.

Rabbits have a life span of up to seven years but there are high rates of mortality among young animals. Female rabbits can be pregnant for 70% of a year and a single adult doe can produce 20 – 50 young.

The introduction of Rabbit Haemorrhagic Disease (RHD) in 1997 significantly reduced rabbit numbers to the point where they were no longer considered a significant problem but there is evidence that RHD is losing its effectiveness in some situations. There has recently been a release of a new strain of the calicivirus that causes RHD, and it is expected that this will suppress rabbit numbers in areas where resistance to the original strain is present.

### 2.2 Proposed Plan

The proposed programme for rabbits is for Sustained Control, with a requirement that rabbits to be maintained at or below Maclean's Scale 3.

### 2.3 Method for analysis of Rabbit options

The analysis undertaken here is Level 2 analysis under the NPD, and is based on information provided by ORC on the costs experienced in managing rabbits. This section details the background assumptions, the model used, the results, and the significance of the results.

ORC differentiates between different land types in determining rabbit proneness and costs of control. The three categories used are High country, Medium country and Low country. There are shown in Table 2 below.

Table 2: Area in each rabbit proneness class for Otago (ha)

Low	Moderate	High
200,000	400,000	800,000

In order to determine the costs of spillover, an estimate was made of the likely impact on costs from rabbits moving between properties. This requires assumptions regarding the increase in control costs, the amount of area on a property likely to be affected by these increased control costs, and the proportion of land holders not controlling rabbits.

The costs of control with spillover between properties is likely to be higher because the immigration from neighbouring high populations densities will shorten the interval between control operations, and potentially increase the cost of those operations. The figures for Otago region were supplied by ORC and are shown in Table 3 below.



**Table 3: Estimate of annual costs of control by rabbit proneness class**

Land type	Total Operation cost/ha	Annual cost/ha without spillover	Annual cost/ha with spillover	Increase in cost/ha/year from spillover
Low	\$120.00	\$15.00	\$30.00	\$15.00
Moderate	\$180.00	\$30.00	\$60.00	\$30.00
High	\$250.00	\$50.00	\$150.00	\$100.00

The spread model assumes that increased costs of control as a result of spillover occur within 500m of a boundary. The boundary length affected is calculated using an assumed square shape for the property, which results in the smallest average boundary length and therefore is likely to be the most conservative.

The numbers of properties not controlling is estimated at 5%. At the height of rabbit infestations prior to RHD introduction non-control of rabbits reached as high as 70% in very rabbit prone parts of the country. However, it is expected that with better returns from high country farming, a better equity position, and the presence of a new strain of RHD, more control will be undertaken now than was the case at that time. While it is possible to produce an extreme case where 50% of the land holders do not control rabbits, a lower limit is used in this paper so that the results are conservative with respect to the benefit which land holders gain from reducing spillover.

It is assumed that the properties not controlling are evenly distributed among those controlling, which produces a higher cost to spillover than if they were to all clump together.

Production benefits are derived on a stock unit basis from MPI Monitoring Farm data for 2011/12<sup>2</sup> updated using Statistics NZ producer price index series. These stocking rates and returns are shown in Table 4

**Table 4: Stocking rates and returns per stock unit for rabbit prone land**

Land type	Low	Moderate	High	Gross margin returns per su (\$)
Otago Dry Hill	3	3	3	\$100.96

Inspection and monitoring costs are estimated by ORC at \$825,000 per annum, which is based on targeted monitoring on known prone properties.

## 2.4 NPD Section 6 Assessment

### 2.4.1 Level of analysis

The Sustained Control objective for rabbits is considered to require a medium level of analysis. This assessment is provided in Appendix B.

<sup>2</sup> <https://www.mpi.govt.nz/news-and-resources/open-data-and-forecasting/agriculture/>.

#### 2.4.2 Impacts of Rabbits (Feral)

Rabbits (*Oryctolagus cuniculus*) cause damage to pastoral agriculture through reduced pasture quality and animal intake. There are also potential damages to biodiversity associated with high rabbit because they browse on vulnerable native plant communities, and as prey they support the mammalian predators of native birds and animals.

Rabbits also provide some benefits associated with commercial hunting for meat and recreational hunting.

#### 2.4.3 Options for response

Two options for a Sustained Control response are considered:

- Boundary control, where rabbits must be kept below Maclean's Scale 3 within 500m of a boundary where the neighbour is controlling rabbits.
- Full control, where rabbits are required to be kept under Maclean's Scale 3 throughout rabbit prone areas.

It is assumed that control is only undertaken on prone parts of Otago.

### 2.5 Risks of Rabbits (Feral) Plan

**Technical and operational risks:** Operational risks with failure of poisoning operations are known, particularly with repeated control efforts in high population densities causing neophobia (bait avoidance). These risks are lower with the presence of RHD, and regular poisoning operations are less common.

**Implementation and compliance:** There is some non-compliance in areas with high rabbit population numbers in rabbit prone areas, particularly given the relatively low return from grazing in very rabbit prone areas. This will be mitigated by the use of complaints and regular inspection of known prone locations to identify problem areas.

**Other legislative risks:** Risks arise to the availability of poisons through the Hazardous Substances and New Organisms (HSNO) Act.

**Public or political concerns:** The use of 1080 is considered controversial and may attract opposition.

**Other risks:** None known

**Summary:** There are risks associated with the rabbit plan although these are likely to be reasonably low as long as RHD has a reasonable level of effectiveness and returns for high country sheep and beef remain at a reasonable level.

#### 2.5.1 Net Benefit and Risk Adjustment

The analysis produces an estimate of the total costs and benefits of the different options for the plan. These are shown in Table 5 below. In addition to the quantified costs and benefits, there are potential benefits associated with preventing damage to biodiversity. There are also intergenerational implications that should be taken into account.

The analysis shows that at 100% probability of success the Boundary Control option generates a net benefit of \$124 million (NPV(6%)), compared with \$149 million (NPV(6%)) for the Full Control plan that requires control on all rabbit infested land. The sensitivity analysis (Table 6)

shows that the results are reasonably robust to the assumptions made about discount rate and proportion controlling.

In order for the options to be worthwhile there would need to be a greater than 45% for Boundary Control option and 35% for the Full Control option. There are also potentially biodiversity benefits on 30,000 ha for the Boundary Control option, and 40,000 ha for the Full Control option.

The analysis suggests that the Full Control has the highest net benefit of the options considered for those values quantified, and protects a greater area from damage to biodiversity values.

Table 5: Outcomes of analysis of costs and benefits for Rabbits (Feral) (NPV6%)

Scenario Option	Control Costs (\$m)	Production loss (\$m)	Inspection, monitoring and enforcement (\$m)	Total (\$m)	Net Benefit of plan option (\$m)	Probability of success for plan to still be positive
Do Nothing	\$37	\$191	\$0	\$228	\$0	
Boundary Control	\$54	\$36	\$13	\$104	\$124	45%
Full Control	\$66	\$0	\$13	\$79	\$149	35%

Table 6: Assessment of sensitivity of results to assumptions for Rabbits (Feral) (NPV(6%) \$million)

	Discount rate			Proportion not controlling		
	6%	4%	8%	Base	2X	4X
Do Nothing						
Boundary Control	\$124	\$170	\$97	\$124	\$262	\$536
Full Control	\$149	\$203	\$116	\$149	\$311	\$635

## NPD Section 7 - Allocation of Costs and Benefits

### 2.5.2 Beneficiaries, exacerbators and costs of proposed plan for control of Rabbits (Feral)

The beneficiaries and exacerbators of the plan are:

- **Beneficiaries:** The beneficiaries of the plan are land holders with high rabbit populations (production benefits), neighbouring land holders from the prevention of prevention of soil erosion, and the wider community from prevention of damage to biodiversity, and
- **Active exacerbators:** Any persons transporting Rabbits (Feral) into or around the region

- Passive exacerbators: Any persons with Rabbits (Feral) on their property not undertaking control.

The direct and indirect costs associated with the plan are shown below in Table 7. The benefits and costs of the plan options, and the parties to whom they accrue, are shown in Table 8. They show that control costs for land holders are the largest cost for both the Boundary and the Full Control approaches. There are potentially some indirect costs for commercial and recreational hunting from the Full Control plan that have not been assessed here. There are however significant benefits for the exacerbators in both the Boundary and Full Control approaches.

*Table 7: Direct and indirect costs of plan for Rabbits (Feral) (\$ million PV6%)*

Plan option	Control costs on land holders	Inspection and monitoring costs
Boundary Control	\$54.32	\$13.00
Full Control	\$66.20	\$13.00

*Table 8: Benefits and costs of plan for Rabbits (Feral) that accrue to different beneficiaries and exacerbators (\$ million PV(6%))*

	Plan option	Those currently infested	Those experiencing spillover costs
Benefits	Boundary Control	\$154.54	\$37.16
	Full Control	\$190.96	\$37.16
Costs for exacerbators	Boundary Control	\$54.32	\$0.00
	Full Control	\$66.20	\$0.00

### 2.5.3 Matters for consideration in allocation of costs

The matters for consideration are spelt out in Section 7(2)(d) of the NPD and the analysis for each of these matters is shown in Table 4 below.

**Table 4: Matters for consideration in allocating costs for proposed Rabbits (Feral) plan**

Legislative rights and responsibilities	None known.
Management objectives	Sustained Control.
Stage of infestation	Widespread but only a problem in some areas.
Most effective control agents	Land holders are the most effective agents to undertake control at low levels, since this ensures that management of the land is aimed at reducing rabbit proneness. At high levels specialist skills are required to undertake aerial or ground poisoning operations.
Urgency	Low because populations appear generally stable and rabbits are very widespread.
Efficiency and effectiveness	It is most efficient to require land holders to control since this will encourage management of the land to reduce population densities. Inspection and enforcement costs are most efficiently targeted at beneficiaries, which are neighbouring properties for the prevention of spillover, and the wider community from biodiversity and soil erosion benefits.
Practicality of targeting beneficiaries	Beneficiaries from production gains are able to be targeted through a rate based on rabbit proneness or geographical area. Wider community beneficiaries are able to be targeted through General Rate.
Practicality of targeting exacerbators	Rabbit numbers can be established through inspection and land holders can be targeted. Exacerbators can therefore be readily targeted.
Administrative efficiency	The administrative efficiency of a targeted rate based on rabbit proneness will be low, and a geographically based rate on pastoral properties (area based e.g. rural zones) is likely to be most efficient for targeting the production beneficiaries from preventing spillover. The wider benefits can be most appropriately targeted through the General Rate.
Security	Rating mechanisms are generally secure.
Fairness	Charges relate directly to benefits or exacerbators. Fairness is a politically determined judgement.
Reasonable	The costs of the programme are reasonably high and ongoing for some land holders. However, some immediate benefit is received in terms of saved production losses.
Parties bearing indirect costs	No indirect costs are expected.
Transitional cost allocation arrangements	Programmes for rabbit control have been in place over a long period. There are no specific problems likely to be encountered requiring transitional arrangements.
Mechanisms available	General Rate, targeted rate (rural properties) and direct charges are the most readily available mechanisms. Levies are expensive to establish and administer. User charges are appropriate for costs of control.

#### 2.5.4 Proposed allocation of costs

The control costs are appropriately targeted at exacerbators since they are able to be targeted, and by requiring them to undertake control there is likely to be greater efficiency in control of the rabbit populations.

The inspection, monitoring, and control costs are likely to be significant, but in both options they are less than the spillover costs avoided from uncontrolled rabbits on a boundary. Therefore the majority of the costs should be charged to land holders in the prone areas.

- Inspection and monitoring costs: 100% targeted rate for rabbit prone areas where inspection will occur.
- Control costs: 100% land holder control.

### 3 Bennett's Wallabies.

#### 3.1 Description

Bennett's Wallabies were liberated in the Hunter's Hills in 1874 and became widespread over a reasonably large area of South Canterbury (350,000 ha) bounded by the Waimate river to the South, the Main divide to the west and north, and lack of suitable habitat to the East and North. The species present here is Bennett's Wallabies (*Macropus rufrogriseus rufrogriseus*). Surveys in the late 1940's indicated that wallabies had reached levels as high as 14/ha in suitable habitat.

Control of Bennett's Wallabies began in 1947 under the Department of Internal Affairs with a shooting programme, although little effect on population numbers was recorded. Aerial 1080 poisoning was carried out on the Eastern Hunter Hills between 1961 and 1963, resulting in a marked decrease in wallaby numbers. Until the Canterbury Regional Council took over responsibility for control of wallabies the South Canterbury Wallaby Board conducted gun and dog control with the occasional poisoning operation. The gun and dog control ceased in 1992 when local ratepayers refused to support the costs of service delivery. Since that time landholder control has been required, but the spread of wallabies has increased significantly such that they are now established on the south side of the Waitaki river in low numbers.

#### 3.2 Impacts of Wallabies

Wallabies cause losses in agricultural production from competition with sheep and some prevention of isolated damage to fodder crops, and impacts to young forestry seedlings during establishment (Warburton 1986<sup>3</sup>).

There are also potential impacts to biodiversity and other ecosystem services. Warburton et al (1995) surveyed different vegetation types in the wallaby endemic areas. They concluded that wallabies do affect the sustainability and biodiversity of vegetation communities in the Hunters Hills. The observed effects were localised (1 - 5 ha), and were mainly significant in the tall tussock grasslands where browsing damage could be considerable. Plant species were browsed to extinction or severely hedged, and short matted turf and moss appeared in place of clumped tussock and mountain daisies in these pockets. In the short tussock grasslands wallabies have little effect, and in forest areas the effects of wallabies may be significant but were not readily distinguishable from those of other browsing herbivores such as sheep, goats, cattle, possums and deer. Adverse effects on soil and water were minimal and confined to

<sup>3</sup> Warburton, B. 1986: Wallabies in New Zealand: history, current status, research, and management need. FRI Bulletin 114. Forest Research Institute, Christchurch. 29 p.

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**[Minute 4]**

**INTRODUCTION**

1. This is the fourth Minute of the Hearing Panel.
2. This Minute sets out the Panel's response to a procedural matter that has arisen.

**CONTEXT**

3. Submitter Maniototo Pest Management Inc (represented by Chair Charlie Hore, Operations Manager Ossie Brown, and member Hamish McKenzie) presented its submission to the Hearing Panel on Thursday 6 June 2019. A transcript of the submission presented at the Hearing is attached to this Minute.
4. On Friday 7 June, Maniototo Pest Management Inc. received an email from Phil De La Mare of Ernslaw One. A copy of the email is attached to this Minute.

**KEY MATTER ARISING**

1. The Maniototo Pest Management Inc contacted Cr Noone following receipt of the email received from Phil De La Mare of Ernslaw One to express concern about the content of the email. Cr Noone undertook to advise Cr Robertson as Panel Chair of the receipt and content of the email.
2. Maniototo Pest Management has expressed a concern based on its perception that there is a conflict of interest given Cr Robertson's husband works for Ernslaw One.

**ACKNOWLEDGEMENT OF POTENTIAL CONFLICT OF INTEREST**

3. The Panel acknowledges the concern raised by the submitter Maniototo Pest Management Inc as a procedural matter.
4. The Panel is satisfied that to date Cr Robertson has provided consistent and sufficient clarity to all parties of the proceedings that her husband works for Ernslaw One, that he is not involved in the plantation forestry aspects of the company, and that he is not involved in Ernslaw One's submission. For completeness, the Panel notes the following disclosures and processes followed by Cr Robertson:
  - i. As detailed in Minute 1 issued by the Hearing Panel on 29 April 2019, the Hearing Panel identified those submitters with whom the Hearing Panel have had current or previous associations. As recorded in Minute 1 Cr Robertson declared that her husband works for Ernslaw One and that he was not involved in Ernslaw One's submission.

- ii. At the commencement of the Hearing Cr Robertson verbally declared that her husband worked for Ernslaw One where his role was establishing a freshwater crayfish harvesting operation and that he was not involved in the plantation forestry aspects of the company.
  - iii. On receiving advice that Ernslaw One wish to speak to the Hearing Panel in Queenstown, Cr Robertson as Panel Chair reconvened the Hearing to move that Cr Andrew Noone be appointed as temporary chair during Ernslaw One's submission presentation.
5. It is the Panel's considered view that the measures outlined in Point 5(i-iii) above sufficiently address and manage any perceived conflict of interest. However, to further mitigate the submitter's concern, the Panel agrees that Cr Robertson will vacate the Chair during the verbal submission of Ernslaw One at the hearing on Monday 17 June 2019 and will excuse herself from considering and determining the submissions of both the Maniototo Pest Management Inc and Ernslaw One during the deliberations phase.

**ISSUED by the Hearing Panel**

**14 June 2019**

***Material Attached to this Minute:***

1. *Transcript of verbal submission made by Maniototo Pest Management Inc on Thursday 6 June.*
2. *Copy of email received by Maniototo Pest Management Inc. from Phil De La Mare of Ernslaw One.*
3. *Reference to Minute 1 issued by the Panel 29 April 2019*
4. *Minutes of the electronic meeting and supporting email correspondance Monday 10 June*



## Transcription of Pest Plan Hearing Thursday 6 June 2019

### Maniototo Pest Management Inc

Charlie Hore, President  
Hamish MacKenzie, Director  
Ossie Brown, Manager

Mr Hore – The submission is for the rabbits. We see the proposed Regional PM Plan is for a scale 3 enforcement in Central Otago. MPM is applying for scale 4 enforcement in the Maniototo because we have our own separate company with 80+ farmers signed up as members covering a land area of 250,000 ha with some very good results. We have some graphs here of rabbits shot over the last 10-12 years so we thought seeing we are reasonably proactive in the Maniototo, and we have a good company going, that we would like to be enforced at scale 4 so that if it does get to scale 3 we can sort that out ourselves but if we are sloppy in our business and our operation and it gets to Scale 4 that's when we think that maybe the Council could come and tap us on the shoulder.

Mr MacKenzie – we do have a couple of problem areas in the Maniototo that are a concern to us – Naseby Forest is one of them that is not part of our group and Patearoa township is not flash at the moment either. We are really limited to what we can do in there now. A few years ago we were able to go in there and control but we can't now, and the forest in Naseby is in a pretty bad shape with rabbits. We are doing our best on the fringes that are involved in our group to keep them at a reasonable level. As I said, Patearoa and Naseby townships are a problem – we're really limited to what we can do there now - we can't go in and nightshoot and we can't poison either. There are a lot of other towns around Otago in the same predicament – Roxburgh isn't great. There has to be a strategy – there has to be something looked at for those particular areas.

Mr Brown – I've been manager of MPM right from the start of the company in 1997. In that time we have only had one poisoning and that was on our boundary – a farmer just on the outside of our boundary gave us a bit of trouble so we had to work together and do a poison but in the last 10 years we've done no major poison work at all and the reason for that is we do intense nightshooting and I follow everything up with helicopter shooting and it's taken away all the need for poison work. As long you operate in low to medium rabbit numbers a helicopter is very effective in dropping your rabbit numbers. We do somewhere between 60 to 80,000 ha a year with a helicopter and it's proven to be extremely effective, mainly because when you're nightshooting you're picking up a lot of the male rabbits in the early breeding season, but when you put a helicopter over during the day you're picking up the doe rabbits that you're not picking up at night and that's why the helicopter is so successful. Maniototo has a very very low population of rabbits and I can't think of anywhere in the Maniototo, apart from the Naseby Forest and Patearoa, where there are rabbits over scale 3 and I'll stick my head up and say that.

Cr Robertson - a good achievement. Mr MacKenzie – the group works really well. Our members contribute with a subscription every few months and their subscription is based on how much work is entitled to be done on that place. My place is 6 nights' work per annum. As an example we might get 100-200 rabbits now whereas 20 years ago it was 1,500. Cr Robertson – you have a big property. Mr MacKenzie – to keep at them is the way to really keep on top of them. Mr MacKenzie passed around a graph showing nightshooting figures from 1997 to 2018. Mr Brown – when I'm nightshooting I'm averaging probably 20-30 rabbits a night, 30 is high. That's over a huge area and I guarantee nowhere else in Otago can beat that, certainly not in central Otago. Cr Robertson – what are you covering on a nightly basis? A whole property, one property? Mr Brown - some properties it takes 12 nights.

Cr Noone asked Mr MacKenzie - you referred to the historic numbers that were shot on your property – do you have any idea what the McLean Scale was back in the day when you really started? Mr MacKenzie – it was always over. Mr Brown – Maniototo is very high rabbit prone country; Hamish’s property is on medium rabbit prone, and Charlie’s was very high rabbit prone. Many years ago a Rabbit and Land Management Programme was brought in on selected farms on high rabbit prone land; it dropped the rabbit numbers by a similar method to what we’re using – intense nightshooting, cover control, tracking, fencing, helicopter work. On the selected properties, and certainly in the Maniototo, it really worked. There are some very high rabbit prone properties on Stonehenge, and Charlie’s father’s property. The society hasn’t done a poison for 25 years. At one stage it was down to a 2 year poison cycle. Because of our current method you wouldn’t know the country, you wouldn’t even think it was rabbit prone land, the rabbit proneness has gone right out of it. Poison is a negative thing; to poison every five years is negative and that’s why I’ve changed my method and it’s worked, worked really well.

Cr Noone – ownership of Naseby forest – the owners were reluctant to be involved when you set up Maniototo Pest Management Inc – they weren’t keen to be involved in that regime – was there any reason for that? Mr Brown – there were many reasons, the main reason was the forest is owned by Ernslaw One and they have forests right across Otago and they have their own policy. Like all forestries they have a different way of looking at rabbits - rabbits don’t really impact on them unless they plant young trees – then they jump up and down and do a tiny poison on that tiny area. The managers in charge of these forests now don’t understand rabbits, they only understand money. Working in the Maniototo with the farmers, that seems to be quite negative to them. Cr Noone – there’s no way they would entertain the idea of contracting MPM to do work for them, it’s a low priority for them because they’re focused on trees. Mr Brown – they have told me that they’d never use 1080 in their forests, but that is needed to control the rabbit numbers. Pindone won’t drop the rabbit numbers, the only thing is 1080 then you can change your methods.

Cr Robertson referred to the nightshooting graph – when did you start using the helicopters? Mr Brown – I had used a helicopter since 1997. I was away from 2002 to early 2007. I had been working in it for so long I just wanted to do something different. When I came back in 2007 the rabbit numbers had accelerated. I had been working in pest destruction since I was 15. I felt poison was so negative and in 2007 I decided to something different. Every 5 years having to do a poison, the country looked bad – couldn’t put stock down for 3-4 months. I thought I had to trial something different. I stuck my neck out, could have lost my job, had a lot of arguments with farmers because some farmers didn’t understand what I was trying to do, and now they support me 100%. It has worked – and we have some very rabbit prone country.

Cr Robertson – have been effective – do you think costwise to a farmer is it comparable? Ossie – there is always a cost in rabbit control. Mr MacKenzie – we don’t what to look at poisoning now because of the sheer cost of it. That’s why we are vigilant with the way we control properties. Mr Brown – when you deal with rabbits there’s always a cost. The important thing is to get a method that’s really effective and cost effective and you’ll win. It’s working out a lot cheaper than poisoning. You had to wait for 2 or 5 years to do a poisoning, but if you put a helicopter through that rabbit prone stuff every year and do an intense nightshooting it’s still a cost but it’s a lot less than poisoning and its proven to be so effective. Cr Robertson – probably also for a farmer also trying to manage their business as well an annual cost would be better than a big blip every 5 years. Mr Hore - it’s a one off cost - the user pays system doesn’t seem to work – one guy might want to spend \$30,000 on rabbits and the neighbour might not want to spend anything so you’re defeating the purpose. The beauty of the company is that all the farmers have bought into it so everyone in the area is getting work done throughout the year. You only have to go up through Central Otago and

see what the farms are like up there – some farmers are doing work and some aren't so it's not having a positive effect. Mr MacKenzie – the way the society is set up the really prone farms contribute quite a lot so most do have a bit sitting in their property account. This means that if we do have a problem they have that money that they can use, it's not one big hit for them.

Mr Simmons – what was the cost per ha per annum to subscribing landowners likely to be. Mr Hore – when the company was set up, some farmers paid more – Mr Brown worked out how much time each farm took, based on the risk and the rabbit proneness of the land. Mr MacKenzie – 1600 shares, \$5-6,000/year. The company was run on the smell of an oily rag.

Mr Simmons asked what the key success factors were. Mr Hore – buy in from farmers, and good operations management by Mr Brown. Part of challenge is for younger generation coming through who haven't grown up with the rabbits, is about reinforcing the fact that if we go away from this it could be dangerous, so use Central Otago as an example of what it was like and what it could go back to. Mr Simmons – how many staff does the company employ? Mr Hore - two full time staff, one part time nightshooter, and helicopter work is staggered over 4 months during winter. Mr Brown - Do helicopter shooting during winter because that's the resident population and that's the lowest population, so that's when we have most effect on them.

*The meeting then moved on to discuss the Canada and white geese problem. The unconfirmed minutes of that section of the Maniototo Pest Management Inc presentation follow.*

Mr Hore noted the presence of Canada and white geese, especially in the Styx. The Company undertook shooting every two to three years, and Styx farmers organise their own shooting every year. Mr MacKenzie noted that problems arose from the number of geese, which ate a lot, and their effect on water quality. The numbers were huge – Mr Brown commented that 5000 were shot in two days.

Comment was made on the wallaby infestation into the northern end of the Maniototo. MPM appreciated funding from ORC, but requested a concerted effort and funding for eradication of wallabies out of Otago. They were hard to find, and still in low numbers. MPM couldn't control wallabies on their own, they needed assistance from ORC and from national government. ORC needed to liaise with ECan to meet their requirement to keep wallabies within their containment zone.

Mr MacKenzie estimated that it would cost \$30-40,000 a year to control wallabies if they arrived on his farm. He noted military surveillance gear (Paul Williams Helicopters) which was needed to find wallabies. There had been a considerable increase in wallaby numbers since Christmas 2018.

Cr Noone suggested that the MPM model wouldn't work elsewhere because of, among other things, the impact of lifestyle blocks. Mr Brown commented that once rabbit numbers were down, other things including weather and virus worked well. Mr MacKenzie said they were happy to talk to other groups about their model.

IMG\_0907.JPG

**From:** Phil De La Mare  
[mailto:[phil.delamare@ernslaw.co.nz](mailto:phil.delamare@ernslaw.co.nz)]  
**Sent:** Friday, 7 June 2019 2:37 p.m.  
**To:** [robrown@xtra.co.nz](mailto:robrown@xtra.co.nz)  
**Subject:** pest management strategy presentation

Hi Ossie

We heard from the councillor receiving submissions that you took the opportunity to bad mouth Ernslaw One on pest management, yet again.

We put up with all sorts of fake news last year about Naseby Forest holding wallabies, and after our on-site wallaby meeting with neighbours which you attended I thought this nonsense had stopped. Apparently not it seems.

Please desist from using public forums to attack our company with unsubstantiated claims. If you have any genuine issues with Ernslaw, then seek our response to them first.

Regards, Phil

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**From:** Cr Andrew Noone (ORC) <[Andrew.Noone@orc.govt.nz](mailto:Andrew.Noone@orc.govt.nz)>

**Sent:** Monday, June 10, 2019 5:03:19 PM

**To:** Cr Ella Lawton (ORC)

**Cc:** Cr Gretchen Robertson (ORC); Janet Favel; John Simmons; Ros Day-Cleavin ([RosDay-Cleavin@outlook.com](mailto:RosDay-Cleavin@outlook.com)); Lisa Miers; Richard Lord

**Subject:** Re: Temporary chair

Supported

Thanks  
Andrew

Sent from my iPad

On 10/06/2019, at 4:58 PM, Cr Ella Lawton (ORC) <[Ella.Lawton@orc.govt.nz](mailto:Ella.Lawton@orc.govt.nz)> wrote:

I second.  
Ella.

Cllr Ella Lawton PhD  
Otago Regional Council

Wanaka  
021 735 981  
[Ella.lawton@orc.govt.nz](mailto:Ella.lawton@orc.govt.nz)

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**From:** Cr Gretchen Robertson (ORC)

**Sent:** Monday, June 10, 2019 4:48:32 PM

**To:** Janet Favel

**Cc:** Cr Andrew Noone (ORC); Cr Ella Lawton (ORC); John Simmons; Ros Day-Cleavin ([RosDay-Cleavin@outlook.com](mailto:RosDay-Cleavin@outlook.com)); Lisa Miers; Richard Lord

**Subject:** Temporary chair

I will open the hearing again to appoint a temporary chair for when I vacate the chair.  
I move that Andrew Noone take the chair for the Earnslaw one submission.  
I have already declared my husband works for Earnslaw one in a role of aquaculture manager not forestry.  
I seek a seconder and support.

Gretchen

Sent from my iPhone

On 10/06/2019, at 1:58 PM, Janet Favel <[janet.favel@orc.govt.nz](mailto:janet.favel@orc.govt.nz)> wrote:

Earnslaw One have advised that they wish to speak to the Hearing Panel. They have been given a time of 3.40 pm on Monday. Their submission is attached.

Cr Robertson has advised that she will stand aside for presentation of this submission.

Janet

<image001.png>

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**Janet Favel**  
HEARINGS  
ADMINISTRATOR

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Otago Regional Council  
70 Stafford St  
Private Bag 1954  
Dunedin 9054  
P (03) 470 7436 or 0800  
474 082

[janet.favel@orc.govt.nz](mailto:janet.favel@orc.govt.nz)  
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<Submission P285 Ernslaw One.pdf>

**Reconvened Hearing of the Proposed Pest Management Plan and Biosecurity Strategy  
held electronically, commencing at 4.50 pm on Monday 10 June 2019**

**Present:** Cr Gretchen Robertson (Chair), Cr Ella Lawton, Cr Andrew Noone, Mr John Simmons

Ernslaw One advised that they now wished to present their submission to the Hearing in Queenstown on 17 June 2019.

Cr Robertson had already made a declaration of interest that her husband worked for Ernslaw One where his role was establishing a freshwater crayfish harvesting operation. He was not involved in the plantation forestry aspects of the company.

Cr Robertson moved  
Cr Lawton seconded

That Cr Noone take the chair for the Ernslaw One submission.

Cr Noone and Mr John Simmons agreed.

**Motion carried**

The meeting closed at 9.40 am on Tuesday 11 June 2019.

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on key matters arising from submissions**

**[Minute 5]**

**INTRODUCTION**

1. This is the fifth Minute of the Hearing Panel.
2. The hearing of submissions has now been completed and Council Staff have provided their initial response to submissions and questions from the Hearing Panel, which is available on the website.
3. The Panel would like to thank submitters for attending and presenting submissions in Dunedin and Queenstown. The time and effort put into making submissions and presenting at the hearing has greatly assisted the decision-making process.
4. The Panel would like to thank staff and submitters who provided further information in response to the directions in Minute 3.
5. This Minute sets out some key questions that have arisen from the review of the staff Hearing Report and the hearing of submissions which will assist us with our consideration of the proposed plan and strategy.

**KEY MATTERS ARISING**

6. We set out below our key questions arising from the review of submissions and the staff report. This is not intended to be an exhaustive list and we may have further questions during the deliberations phase.
  - a. Many submitters are opposed to certain pest species being included in the Plan. The Panel acknowledges the staff response to such submissions (for example see P063.1) that species such as feral cats, hedgehogs, deer and goats are included in the Plan as site-led pests only and that site-led programmes are designed and implemented to protect identified values specific to particular sites, where there is demonstrable community support. We are interested to understand from staff the process and/or system for how the specific values specific to particular sites were identified, and the grounds on which specific pests are promoted for these sites?
  - b. We note the submission made by Environment Canterbury (P222.3) that seeks the amendment of Rule 6.3.2.3 (bur daisy) to include a date by which control must be undertaken. We note the staff response that bur daisy is confined to one 10ha site in Otago with one land occupier. Can staff please explain what impediments exist for immediate eradication of bur daisy? And/or any impediments to setting an early date by which eradication can be achieved?



- c. We note a few submitters query the use of the word 'may' in Section 5.3, for example P258.7 Forest and Bird; P335.10 Barrie Wills. We acknowledge the staff response that the use of 'may' in Section 5.3 and in the tables reflects that a variety of principal measures exist to manage pests. We would like further clarity from staff as to why the word 'may' is used in Section 5.3 (1)-(5) in relation to the outcomes sought. We specifically query why 'may' is used in Section 5.3(1) i.e. where Plan rules dictate, landowners must act? Therefore is 'shall' more appropriate in this provision?
- d. The Panel notes the submissions presented at the hearing by Vanessa and Ben Hore (P255.2) and George Collier (P254.1) who oppose the inclusion of Russell lupin as a pest plant in the proposed plan due to concerns that the proposed plan will adversely impact on existing planted pastures containing Lupin. The staff response was that the Russell lupin rules are likely to have a limited impact on farming operations as they are only applicable in relation to its proximity to rivers and artificial water courses, and property boundaries. We would like staff to provide the following information regarding Plan Rules 6.4.5.1 and 6.4.5.2.
- Rationale for the proposed approach to prevent planting and occupation by Russell lupin within 200m of the outer gravel margin of a braided river, and 50m from any non-braided river. What is the science that underpins this distinction?
  - Confirmation that the definitions, as articulated in the rule provisions, are the same definitions used to assess impact as part of the analysis of costs and benefits?
  - Whether the staff view has changed in any way following the evidence provided by these submitters at the hearing?
- e. We are interested to understand the view of the Department of Conservation on the impact of Russell lupin on braided river systems, susceptibility of other river systems, and wider ecosystems and biodiversity in Otago.
- f. Following receipt of the information in (d) and (e) above, we will likely ask the author of the cost benefit analysis (Simon Harris) to review Section 23 of his report<sup>1</sup> on the basis of the evidence presented by the submitters and any revised staff view received in response to this minute.
- g. We note the submission by the Department of Conservation (P289.4) seeking that the Council give priority to the eradication of Spartina and African Love Grass. Regarding Spartina, can staff and the Department of Conservation please address the following questions:
- What is currently being done to control Spartina and by what agencies?
  - Is there a desire to eradicate Spartina, and if so, what agency would take the lead and fund the eradication work?
- h. Kāi Tahu ki Otago (P332.11) request consideration under 'Exemptions to Plan Rules' to exercise mana whenua rights to continue to customary harvest and use perennial nettle as part of customary gathering. We note the staff response that Section 8.3 of the plan as proposed provides a process to apply for exemptions relating to perennial nettle. Can staff please comment as to whether it is possible to establish a 'blanket' exemption process for

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<sup>1</sup> 'Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits'. Report prepared for Otago Regional Council as part of the preparation of a Regional Pest Management Plan by Simon Harris – Land Water People.

Kāi Tahu ki Otago under section 78 of the Act to enable customary harvesting and describe how this might be reflected in the Plan document?

- i. Kāi Tahu ki Otago (S013.4) seeks the use of the term ‘cultural landscapes’ in the plan to reflect the contemporary and historical associations of residents and their interactions with such landscapes over time. Can staff please comment on the use of the term ‘cultural landscapes’ and their understanding of the tangible and intangible elements of these landscapes, and do staff consider it would be useful to include a definition in the Strategy?
  - j. Submitter Landscape Connections Trust Halo Project (P295) presented at the hearing and referenced Halo Project work and related evidence addressing the eating and predatory behaviours of cats relating to lizards and birds. Can the submitter please provide an electronic copy of this material for the Panel to consider.
  - k. Submitter Landscape Connections Trust Halo Project (P295.8) and Predator Free Dunedin (P295.8) seek amendments to the timeframes for the Landscape Scale and Site Scale projects within the Strategy. We note that staff recommend rejecting the submissions based on the reason that ‘these are appropriate timeframes to develop this guidance. Staff will endeavour to undertake this work faster than the timeframes in the Strategy, if possible’. Can staff please comment on the extent to which the work is achievable within shorter timeframes. Further, can staff please comment on any timeframes contained within any MOU in place with the submitter groups and the alignment with the timeframes in the Strategy.
  - l. Predator Free NZ Trust (P217.2) presented at the hearing and referenced work undertaken by the Department of Conservation addressing the costs of immunisation against Toxoplasmosis. Can the submitter please advise us of the name, author and date of this research and provide an electronic copy for the Panel if possible.
  - m. We note the numerous submissions generally opposing the use of 1080 as a pest control agent and the staff approach to reject these submissions on the basis that *‘the purpose of the proposed Plan and Strategy is not to recommend specific control methods. The legislative control and use of 1080 is administered by the Environmental Protection Authority’*. We are interested in further explanation regarding Action 3.2.2 of the Strategy which requires ORC to provide support, advice, and guidance on how to control and manage harmful organisms, and the provision of information on surveillance, identification, and control measures. Therefore, is it the case that the ORC is in fact promoting the use of 1080 and therefore are these submissions in fact in scope?
7. **We direct the Council** respond to the questions in writing and to make this available ideally by 5pm 2 July 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
  8. **We direct the Department of Conservation** to provide the additional information requested in 6(e) and (g) above and to make this available by 5pm 2 July 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
  9. **We direct the Landscape Connections Trust Halo** to provide the additional information requested in 6(j) above and to make this available by 5pm 2 July 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.

10. **We direct Predator Free NZ Trust.** to provide the additional information requested in 6(l) above and to make this available by 5pm 2 July 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
11. The next minute will set out the Panel's direction for the process going forward through to us making our recommendation to Council.

**ISSUED by the Hearing Panel**

**25 June 2019**

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on key matters arising from submissions**

**[Reissued Minute 6]**

**INTRODUCTION**

1. On 10 July 2019 the Hearing Panel issued Minute 6 which detailed further information required from staff and the Department of Conservation by either 1 August 2019 or 16 August 2019.
2. On 30 July 2019 the Hearing Panel issued an email asking staff and the Department of Conservation to suspend the provision of the further information as requested in Minute 6 pending a revised Minute to include new dates by which the information is required.
3. This is the revised Minute 6 of the Hearing Panel.
4. This Minute sets out our directions to staff arising from our consideration of submissions, the staff report, evidence presented at the hearing, and responses to Panel directions in Minutes 3 and 5.
5. Note this is not intended to be an exhaustive list and we may have further questions during the deliberations phase.

**KEY MATTERS ARISING**

6. We direct staff to undertake a cost benefit analysis in accordance with the requirements of the Biosecurity Act 1993 (the Act) and the National Policy Direction for Pest Management 2015 (NPD)) to enable us to consider the following additions to the Plan:
  - (a) *An exclusion programme for egeria and hornwort species*
  - (b) *A Good Neighbour Rule (GNR) to require the control of old man's beard on Crown land within 20m of a property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate old man's beard within 20 metres of that boundary*
  - (c) *In collaboration with DOC, the addition of a GNR to require the elimination of wild Russell lupin within 10 metres of a property boundary where the occupier of the adjoining property is taking reasonable steps to eliminate wild Russell lupin within 10 metres of that boundary.*
  - (d) *In collaboration with DOC, regarding the submissions presented by Blackstone Hill Ltd and George Collier (P255 and P254), we direct staff to consider whether amendments are required to the provisions regarding the control of Russell lupins. We request that any further cost benefit analysis accounts for relevant productive and economic values, and any differences in setback requirements presented in the situation of a permanently flowing river as opposed to intermittently flowing water. If staff do not consider that amended rules are appropriate, we are further interested in understanding whether staff consider an*

*exemption process for the 50m setback would be appropriate in some circumstances, how this process might work, likely exemption criteria that would apply, and any informational requirements that would be required from applicants to justify the grounds upon which an exemption request is being made.*

*(e) The addition of a wilding conifer specific pest agent rule as requested by Land Information New Zealand (P312.11). We direct staff to consider the appropriateness of the request as it pertains to the Otago context.*

7. We direct staff to provide a recommendation on whether the following alterations are required to the Plan:

*(a) An extension to the gorse and broom free area in the Cardrona Valley to the new area further north to the Cardrona Ski Road.*

*(b) Alteration to the gorse and broom free boundary on the property of Gill Harbrow.*

8. We direct staff to respond to the following information requests regarding wilding conifers:

*(a) We note the submission request made by Ministry for Primary Industries (MPI) (P276.11) for Council to consider the addition of a rule or rules requiring occupiers to remove wilding conifers prior to cone-bearing within areas that are currently clear of wilding conifers but are vulnerable to wilding conifer invasion. We note that MPI suggests that Rules 1, 2 or 3A in the 2016 guidance document could potentially be used for this purpose. Can staff, in consultation with MPI if required, provide the following information:*

- Description of the 2016 guidance document and the rules put forward by MPI*
- An assessment of whether inclusion of the rule(s) would represent an effective and feasible regulatory mechanism*
- Set out any alternative mechanisms by which to achieve the request in vulnerable areas.*

*(b) We note the staff view that a non-regulatory approach to the progressive removal of existing planted shelter belts and small plantings is preferable over a regulatory approach. The reason is that the removing of shelterbelts and small scale plantings without a non-regulatory transitional period first, would impact land occupiers that use these trees for stock shelter and other uses such as windbreaks. However, the Panel has also heard from submitters (e.g. Wakatipu Wilding Conifer Control Group and Central Otago Wilding Conifer Control Group) that seek a regulatory approach including a time frame by which the removal of existing planted shelter belts and small plantings must occur. Should the Panel be of the mind that a regulatory approach is required, what are the regulatory options available to achieve the removal/replacement of the wilding conifers (in regard to existing shelter belts and plantations under 1 ha) where the shelter belt is sited next to vulnerable land within the life of the plan, and what are the pros and cons of these options?*

9. We note the submission made by Forest and Bird (P258.6) regarding the management of goldfish. Can staff provide additional information on DOC's regulatory authority in managing goldfish, and whether there is any evidence to suggest goldfish be included in the Plan, and comment on any specific measures that could be undertaken by the ORC in collaboration with interested groups to assist in the management of goldfish?

10. We note the submission made by Forest and Bird (P258.9). We direct staff and the Department of Conservation to provide further risk assessment information on heath rush for the Panel's consideration.
11. We note the staff response provided to Panel Minute 5 on the process for Dunedin site-led programmes. We appreciate the information about the chronology of consultation undertaken as part of this plan review process. The Panel remains interested in any further clarification on the specific values derived from this process. Can staff set out the specific values determined to be at threat? Can staff provide a copy of the PFD response received in February 2018 which set out the values in the site led areas and the potential species and programme that could be used to manage impact on these values.
12. We note that staff indicated in their closing response they have ideas about feral rabbit control in urban and peri-urban areas. Can staff provide further information in this regard.
13. The Panel noted many submissions that support and stress the importance of environmental monitoring of plan outcomes/plan effectiveness. We acknowledge that following the establishment of the plan it is proposed that ORC will establish a plan of action / operational plan to ensure the delivery of the plan outcomes, including monitoring of key species. Are staff confident that the proposed measurement of plan objectives will provide enough certainty in the plan document itself, that the Council can achieve the intended plan outcomes?

By way of example, the submission made by Queenstown Lakes District Council (P263.12) supports the 'spatial reduction' of wilding conifers over the life of the Plan. We query whether Section 7.0 of the plan (as currently drafted) provides a sufficiently tangible benchmark by which to measure and determine whether a 'spatial reduction' has occurred over time?

14. **We direct the Council** provide the further information as requested and to make this available by 9am 19 August 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
15. **We direct the Department of Conservation** to provide the additional information requested in point 10 above and to make this available by 9am 19 August 2019. A copy of the response will be placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/pestplan>.
16. **Submitters** will have the opportunity to provide their written views on the cost benefit analysis following receipt of this information (*as per matters set out in 6(a)-(e) above*) and as directed in a subsequent Panel Minute.
17. **Submitters and affected land occupiers** will have the opportunity to provide their written views on the staff recommendation (*as per matters set out in 7(a)-(b) above*) following receipt of this information and as directed in a subsequent Panel Minute.

**ISSUED by the Hearing Panel  
2 August 2019**

**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on key matters arising from submissions**

**[Minute 7]**

**INTRODUCTION**

1. This is the seventh Minute of the Hearing Panel.
2. On Monday 19 August 2019 at 9.00am we received further information from staff and the Department of Conservation in response to the Panel directions as set out in Minute 6. A copy of the information provided was placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/hearings>
3. At its meeting on 1 August 2019 the Otago Regional Council:
  - a. *Noted that the Hearings Panel has determined in accordance with section 72(4) of the Biosecurity Act 1993 that further consultation on the Proposed Regional Pest Management Plan be undertaken with property occupiers affected by the proposed extension to the Gorse and Broom Free Areas in the Cardrona Valley;*
  - b. *Resolved in accordance with section 72(5) of the Biosecurity Act 1993 that consultation be undertaken by informing the property occupiers in writing of the proposed extension to the Gorse and Broom Free Areas and giving the property occupiers an opportunity to provide their views in writing;*
  - c. *Delegated to the Hearing Panel (acting under clause 32 of Schedule 7 of the Local Government Act 2002) the necessary powers, functions and duties under the Local Government Act 2002 and Biosecurity Act 1993 to consider any written views received from the Property Occupiers as part of its recommendations to Council as to the Council's decision on the proposed regional pest management plan.*
4. In accordance with the Council resolution, this Minute sets out our directions to staff to undertake consultation on the Proposed Regional Pest Management Plan with property owners affected by the proposed extension to the new Gorse and Broom Free Areas in the Cardrona Valley.
5. This minute also sets out an opportunity for submitters to provide their written views on the recommended additions by staff to the Otago Regional Pest Management Plan proposal. It is important to stress that the scope of any comments from submitters should focus on technical or workability matters relating to the recommended provisions, being those recommended provisions in **green text** in Appendix 1 to the staff response to Minute 6. It is not an opportunity to resubmit on matters already submitted on, as those matters will still be considered as part of our deliberations.
6. It is also important to note at this stage, that any changes as recommended by staff do not represent a final draft, nor does it signal we have reached a decision on submissions.

## KEY MATTERS ARISING

7. **We direct staff** to consult with the affected land occupiers within the area illustrated on Page 7 of the staff response with regards to an extension to the new gorse and broom free areas in the Cardrona Valley. We direct that this be undertaken by sending letters which advises that any response to the letter be received in writing by **5pm Friday 6 September 2019**. We direct staff to collate and summarise these responses and provide this summary to the Panel in writing by 9am Tuesday 10 September 2019. Copies of the responses will be placed on the website at the following link <https://yoursay.orc.govt.nz/hearings>.
8. **We advise submitters** of the opportunity to provide their written views on the recommended provisions from staff, being those recommended provisions in **green text** in Appendix 1 to the staff response to Minute 6. The scope of any comments from submitters should focus on technical or workability matters relating to the recommended provisions. It is not an opportunity to resubmit on matters already submitted on, as those matters will still be considered as part of our deliberations. Comments on technical and workability matters are due by **5pm Friday 6 September 2019**. We direct staff to collate and summarise these responses and provide this summary to the Panel in writing by 9am Tuesday 10 September 2019. Copies of the responses will be placed on the website at the following link <https://yoursay.orc.govt.nz/hearings>.

**ISSUED by the Hearing Panel**

**22 August 2019**



**Otago Regional Council**  
**Proposal for an Otago Regional Pest Management Plan pursuant to the**  
**Biosecurity Act 1993 and the proposed Biosecurity Strategy**

**MINUTE AND DIRECTIONS OF HEARING PANEL**  
**on key matters arising from submissions**

**[Minute 8]**

**INTRODUCTION**

1. This is the eighth Minute of the Hearing Panel.
2. On Friday 6 September we received the written views of two submitters in response to the Panel directions as set out in Minute 7. A copy of the information provided has been placed on the website for submitters on the following link <https://yoursay.orc.govt.nz/hearings>
3. The Panel would like to thank submitters who provided further written views in response to the directions in Minute 7. Given the small volume of written responses received, the Panel decided it no longer required staff to collate and summarise these responses.
4. The Panel gives notice that the Hearing to consider an Otago Regional Pest Management Plan and Biosecurity Strategy is now formally closed.
5. The Panel advises it will complete its deliberations and report its recommendations for a decision to the Otago Regional Council on 25 September 2019.

**ISSUED by the Hearing Panel**

**11 September 2019**

## APPENDIX 4

### AN ASSESSMENT OF THE OTAGO REGIONAL PEST MANAGEMENT PLAN AGAINST THE REQUIREMENTS OF SECTIONS 73 AND 74 OF THE BIOSECURITY ACT 1993 AND THE NATIONAL POLICY DIRECTION 2015

#### **Purpose of this assessment**

Otago Regional Council has prepared a Regional Pest Management Plan for Otago (the Plan) under the Biosecurity Act 1993 (the Act).

Section 73 of the Act outlines matters that must be set out in the Plan. Section 74 outlines the matters the Council must consider and be satisfied with when making the Plan. These sections refer to requirements also contained within the National Policy Direction for Pest Management 2015 (NPD).

The tables below illustrate the relevant clauses of sections 73, 74 and the NPD. For each clause a description is provided of how the requirements in the Act have been met.

<b>SECTION 73: FOURTH STEP: APPROVAL OF PREPARATION OF PLAN AND DECISION ON MANAGEMENT AGENCY</b>		
<b>Section 73(d) of the Biosecurity Act 1993 provides that the Plan must set out the following matters:</b>		
<b>Section of Act</b>	<b>Requirement</b>	<b>How it is met?</b>
73(3)(a)	The pest or pests to be eradicated or managed:	Section 4.1 (list of organisms classified as pests) and Section 6.0 (details of pests)
73(3)(b)	The plan's objectives:	Section 6.0 outlines the objectives of the plan in relation to each pest
73(3)(c)	The principal measures to be taken to achieve the objectives:	The principal measures to be used in the plan to achieve the objectives are stated in section 5.3. The measures used for each pest are discussed in section 6.
73(3)(d)	The means by which the achievement of the plan's objectives will be monitored or measured:	Section 7.1 provides details on the means by which the objectives and outcomes will be monitored for each pest.
73(3)(e)	The sources of funding for the implementation of the plan:	Section 9.0 provides details on the sources of funding for the implementation of the plan
73(3)(f)	The limitations, if any, on how the funds collected from those sources may be used to implement the plan:	Section 9.3 of the plan explains there are no unusual administrative problems or costs expected in relation to recovering costs from any of the persons who are required to pay.
73(3)(g)	The powers in Part 6 to be used to implement the plan:	Section 8.1 outlines the powers to be used to implement the plan
73(3)(h)	The rules, if any:	Section 5.4 and Section 6. All rules are contained and explained in these sections.
73(3)(i)	The rules, if any, that are good neighbour rule:	Each good neighbour rule is clearly identified in Section 6 of the plan.
73(3)(j)	The management agency:	Section 3.1 of the plan states Otago Regional Council will be the management agency
73(3)(k)	The actions that local authorities, local authorities of a specified class or description, or specified local authorities may take to implement the plan, including contributing towards the costs of implementation:	Section 3.1 states that Otago Regional Council, as the management agency, will use the measures described in the Plan, in conjunction with its operational procedures, to implement the Plan.  Sections 3.3.3 and 3.3.4 refer to the requirement for territorial authorities to control pests on land they occupy and the control of pests in road reserves.
73(3)(l)	The portions of road, if any, adjoining land covered by the plan and, as authorised by section 6, also covered by the plan:	Section 3.3.4 outlines responsibilities in road reserves and the portions of road to which the plan applies.

73(3)(m)	The plan's commencement date and termination date:	Section 1.3 sets out that the plan will take effect on the date on which the ORC affixes its seal and it becomes operative as a Regional Pest Management Plan under section 77 of the Act. This section clearly states the plan's duration is for a period of 10 years following it becoming operative.
73(3)(n)	Any matters required by the national policy direction.	Refer to Table 1 of the plan that sets out the NPD requirements and how they are met.
73(4)	Compensation.	Compensation is addressed in Section 3.2 of the Plan.
73(5) & (6)	Rules	The plan accords with these sections regarding the application of rules.

**SECTION 74: FIFTH STEP: SATISFACTION ON CONTENTS OF PLAN AND**

**Section 74 of the Biosecurity Act 1993 provides that if the council is satisfied that section 73 has been complied with, the council is then to consider whether the council is satisfied of the following matters:**

Section of Act	Requirement	Can the Council be satisfied?
74(a)	that the plan is not inconsistent with—	
	(i) the national policy direction; or	Yes. Section 2.2.2 of the plan addresses this requirement along with the analysis of compliance with the NPD outlined in this table. The Hearing Panel are satisfied with the analysis undertaken in accordance with the NPD within Appendix 4 to the Staff Hearing Report and adopt this here.
	(ii) any other pest management plan on the same organism; or	Yes. Section 2.3.1 of the plan addresses this requirement.
	(iii) any pathway management plan; or	Yes. Section 2.3.1 of the plan addresses this requirement.
	(iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991;	Yes. Section 2.3.2 of the plan addresses this requirement.
	(v) any regulations; and	Yes. Section 2.3.3 of the plan addresses this requirement.
74(b)	that, for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other courses of action; and	Yes. The costs and benefits were summarised within the Proposal, along with the alternative actions and inaction. These were assessed in accordance with clause 6 of the NPD. The results were summarised in Section 9 of the Proposal and the full analysis is published in the reports Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits October 2018 and Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Additional analysis of costs and benefits August 2019 (the CBA Reports).
74(c)	that, for each subject of the plan, persons who are required, as a group, to meet directly any or all of the costs of implementing the plan—	
	(i) will accrue, as a group, benefits outweighing the costs; or	Yes. The beneficiaries and exacerbators were documented within Section 9 of the Proposal and the CBA Reports, together with the overall costs and benefits of implementing the Plan.
	(ii) contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan; and	Yes. The beneficiaries and exacerbators were documented within Section 9 of the Proposal and the CBA Reports, together with the overall costs and benefits of implementing the Plan.
74(d)	that, for each subject of the plan, there is likely to be adequate funding for the implementation of the plan for the shorter of its proposed duration and 5 years; and	Yes. Section 9 of the plan sets out a funding analysis. The costs of implementing the Plan are outlined in section 9.2 along with proposed funding sources in section 9.1. The Council as the management agency, would have the authority to rate and amend rates to implement the plan.

74(e)	that each rule—	
	(i) will assist in achieving the plan's objectives; and	Yes. The rules provide a regulatory tool to ensure appropriate actions are taken by landowners and occupiers, the Council or other parties, and that these actions are effective and efficient.
	(ii) will not trespass unduly on the rights of individuals.	Yes. The rules are the same or similar to rules already in place in Otago and many other areas of New Zealand. Targeted consultation with key stakeholders has been undertaken and formal public consultation provided additional opportunities for any affected party to submit and be heard. The new rules do not unduly trespass on the rights of individuals.

# DECISION ON THE OTAGO REGIONAL PEST MANAGEMENT PLAN 2019-2029

Pursuant to section 75 of the Biosecurity Act 1993, the Otago Regional Council gives public notice that it has made its decision on the Otago Regional Pest Management Plan.

## **Inspection and availability of the decision report and Regional Pest Management Plan**

Copies of the decision report and Regional Pest Management Plan are available for public inspection:

- 70 Stafford Street, Dunedin
- William Fraser Building, Dunorling Street, Alexandra
- Terrace Junction, 1092 Frankton Road, Queenstown
- [yoursay.orc.govt.nz/pestplan](http://yoursay.orc.govt.nz/pestplan)

Paper copies can be requested at a cost as per the Fees and Charges Policy.

It is noted that the decision report also includes Council's decision on the Biosecurity Strategy.

## **Applications to the Environment Court**

Pursuant to section 76(3) of the Biosecurity Act 1993, any persons who made a submission on the Proposal for the Regional Pest Management Plan may make an application to the Environment Court on the matters set out in section 76(2) of the Biosecurity Act 1993.

The application must be made within 15 working days after the date of this public notice, which was first published Monday 1 October 2019.

An application is made under section 291 of the Resource Management Act 1991 and regulations made under the Resource Management Act 1991.

***For any enquiries please contact [pests@orc.govt.nz](mailto:pests@orc.govt.nz) or call 0800 474 082.***

***Sarah Gardner  
CHIEF EXECUTIVE***



Private Bag 1954, Dunedin 9054  
0800 474 082 • [www.orc.govt.nz](http://www.orc.govt.nz)

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Wanaka Sun

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Mountain Scene

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