

Proposed Tasman-Nelson Regional Pest Management Plan

Plan Submissions
Councils Decision Report
February 2019



Introduction to Report

On 4 November 2017 Tasman District Council (TDC) and Nelson City Council (NCC) jointly notified a Proposed Regional Pest Management Plan (the Proposal) for public comment. A total of 100 submissions (including further submissions) were received, with a public hearing held before a Regional Pest Management Joint Committee (the Joint Committee) which convened on 16 April 2018. Following the hearing of submissions Council officers reported to the Joint Committee with analysis and comments regarding each submission point. Deliberations on submissions were held on 25 and 29 June 2018, 2 July and again on 15 August 2018. As a result of this process further submissions were called for with regard to a site-led pest management proposal for specific pests within the Abel Tasman National Park area.

The Joint Committee reconvened on 3rd December 2018. Council officers produced an amended RPMP (a new version of the Proposal) along with supporting documents. Council officers reported to the Joint Committee regarding the scope and nature of changes made in response to submissions and further analysis and on the next steps in the process, in accordance with sections 73 and 74 of the Act. The Joint Committee received this information and subsequently made recommendations on each appropriate submission point, in accordance with Biosecurity Act (the Act) and National Policy Direction for Pest Management (NPD) requirements, to the respective Councils.

Under section 75 of the Act the two Councils have determined that the requirements of the Act and NPD have been met with regard to the amended Proposal, including that matters raised in consultation had been considered (noting also the additional consultation undertaken by Council officers at the direction of the Joint Committee during September/October 2018). This report is a compilation of the staff response to submissions received, through to decisions on each point and reasons. It briefly summarises the key issues arising in submissions on the Proposal, then sets out how issues have been addressed through the amended Plan, in tabular form. The report is derived from the *Submission Briefings Report* (an officer's report) that was prepared for the deliberations process. Where possible, the main thread of the submissions have been captured verbatim. However, while the authors have sought to represent each submission as faithfully as possible, a degree of interpretation and abridgement is unavoidable. Therefore, this document should be treated as a guide to submissions and does not replace referring to the full submissions if necessary. The full submissions is available on request.

The tables below set out the summaries of submissions arranged by topic, with a compilation of all recommendations of the Joint Committee to the Councils over the course of the process, as follows:

- the first column of the report contains a summary of the submissions received on each topic area and a list of submitters and further submitters for this topic.
- the second column contains the staff analysis (or comments) around the changes being sought by the submitters, providing options where possible and commentary on the legal, technical and financial implications of accepting or rejecting the submissions on this topic area.
- the third column of the Report contains the recommendations of the Regional Pest Management Joint Committee. These recommendations provided both the directions to guide editorial changes to the amended Plan (and its supporting documents) and provides a record of decisions, as required by section 75 of the Biosecurity Act 1993.

1. General Comments and Support for the Overall RPMP

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16768 Fish and Game Nelson Marlborough</p> <p>16796 Department of Conservation</p> <p>16798 Federated Farmers</p> <p>16802 Waimea Nurseries</p> <p>17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>General support of RPMP proposal</p>	<p>These organisations have submitted in general support of having a Tasman–Nelson Regional Pest Management Plan and for the pest species and programmes that the Plan Proposal contains.</p>	<p>Recognise there is general support from the key stakeholders for the RPMP.</p>

2. Opposition to the Overall RPMP

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 16756 Miss Barbara Stirrup X18119 Nelson- Tasman Forest and Bird. Oppose Matter: Opposed to any pest control at all</p>	<p>Noted. Regional Pest Management Plans are specifically provided for in the Biosecurity Act 1993. Tasman District Council and Nelson City Council have had a joint Regional Pest Management Strategy under the Biosecurity Act since 1995 and are carrying forward existing programmes and sunk investment over extended period of time. Some of these programmes predate the Biosecurity Act and were originally mandated under the Noxious Plants Act 1978.</p>	<p>Notes that there is some opposition from individuals.</p>
<p>Submitters: 16770 Mr Dai Mitchell Matter: Do not agree with the breadth, approach or consultation of the RPMP proposal. Overall comment was Not valid or acceptable.</p>	<p>Noted. See above. The Pests and Programmes proposed have strong Council and community support. The RPMP development process has included targeted pre-consultation, targeted consultation with draft Plan documents, full public submissions for nearly two months and further submissions.</p>	<p>Notes that there is some opposition from individuals.</p>

3.1 Technical and Editorial Changes

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 14848 Mr Bryce Buckland</p> <p>Matter: MPI is being restricted and will be rebranded.</p> <p>Decision sought: Remove reference to MPI as it is being restructured.</p>	<p>This is a technical amendment which can be made without the need for a formal plan change once matters related to the MPI structure are resolved by Central Government.</p>	<p>Agree with staff recommendations.</p>

3.2 NPD and Biosecurity Act Changes

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitter: 17586 (MPI)</p> <p>Matter: Ensure CBA includes landowner costs.</p> <p>Decision Sought : For significant programmes quantitative CBA should be used.</p>	<p>The original CBAs for pests that have occupier costs associated with them have been independently reviewed. As part of the plan forming process, the review identifies that revised CBAs will be needed for: any new pests added; pests where the control programme type is proposed to change; or where the pest may be subject to new good neighbour rules. Occupier costs to be revised for these.</p> <p>The review also identified that the Yellow bristle grass (not proposed for change) is a significant enough programme that the occupier costs should be revised, and a quantitative CBA performed.</p>	<p>Council commissioned an independent review of quantitative CBA analysis. Land owner costs have been considered for significant programmes. Small programmes are not significant enough to warrant numerical analysis.</p> <p>The amended CBA document has updated accordingly.</p>

3.3 Other Edits/Formatting Required

No submitters.

4. Part One Matters – Introduction (1), Background (2), Responsibilities (3)

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 16796 Northern South Island Department of Conservation</p> <p>Matter: This section contains the statement <i>“There are many organisms in the Tasman-Nelson region that can be considered undesirable or a nuisance. However, it is only when individual action or inaction in managing pests imposes undue effects upon others that regional management is warranted.”</i></p> <p>I submit this is an incorrect representation of the reason of a pest management plan. Based on the Biosecurity Act’s sections 54 and 71: The purpose of RPMPs is to provide for the development of</p>	<p>Staff agree that the current wording in (Section 1.2, paragraph 2) deals with only one situation warranting regional intervention through an RPMP (the circumstances leading to rules). As it currently reads interventions with regard to exclusion and eradication activities, for example, are not covered and overall is not a fair reflection of the legislation.</p> <p>While the submitter’s revised wording enhances the current wording, the following drafting captures even more of the intent of this section, with regard to fundamental aspects of the Biosecurity Act (sections 54 and 71). Staff suggest opting for the following substituted wording for this section:</p> <p><i>“There are many organisms currently in the Tasman-Nelson region, or which could potentially establish in the region, that are considered undesirable or a nuisance. However, it is only where a subject is capable of causing an adverse effect in the region, where a coordinated approach would be more effective than voluntary and unplanned management, and where the</i></p>	<p>Agree with the submitter’s concerns and staff response to the submission which is to revise paragraphs within 1.2 Purpose. (Now new section 1.1).</p>

<p><i>“effective and efficient instruments and measures that prevent, reduce, or eliminate the adverse effects of harmful organisms on [specified values]” (Biosecurity Act, s 54).</i></p> <p>“Efficient” includes the requirement that the benefits of the plan would outweigh the costs (s 71(e)), and the appropriate distribution of costs associated with the instruments and measures. The wording used by Council changes the fundamental purpose of having a pest management plan for a particular subject and suggests that greater weight should be given to “Good Neighbour Rules” (GNR) than is warranted (even though no GNRs are included in the Proposed RPMP).</p> <p>The rationale described contradicts the proposed interventions with respect to plans for eradication or exclusion subjects.</p> <p>Decision Sought:</p> <p>Revise the representation of the reason for having a Regional Pest Management Plan to correctly</p>	<p><i>benefits of a regional plan approach outweigh the costs of that plan that regional intervention is warranted.</i></p> <p><i>The Councils consider that, for some of these organisms, a pest management plan will add significant value to the region, by providing for the exclusion, eradication, and containment of pests, and other effective management of named organisms, such as reducing their effects and protecting special places from pests. The Biosecurity Act 1993 (the Act) contains [as per rest of paragraph]”.</i></p>	
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<p>represent the legislation eg <i>“There are many organisms in the Tasman-Nelson region, or which could infest the Tasman-Nelson region, that are considered undesirable or a nuisance. For some of those organisms it is considered that a pest management plan will add significant value to the region by providing for the eradication or effective management of those pests and that that value will exceed the value derived from uncoordinated individual actions (or inaction).”</i></p>		
<p>Submitters: 16796 Northern South Island Department of Conservation</p> <p>Matter: This section states that <i>“Activities in implementing this Plan must comply with other legislation”</i> (which is correct) and summarises the requirements of the Wild Animal Control Act 1977 and Wildlife Act 1953. However, it should be noted that these requirements are</p>	<p>The paraphrasing this whole section of the Biosecurity Act (as proposed) may be materially superfluous in the final Pest Plan document and one option would be to trim this section to capture the core essence that the Plan has been reviewed and complies with other legislation.</p> <p>For instance, Figure 4 can be revised to capture all of the legislative instruments that the pest Plan must account for under Section 7 of the Biosecurity Act.</p> <p>For instance, the descriptive Sections 2.2.2 through to 2.2.4 can be removed (this was only context needed for the proposal) and can be replaced with a more general statement affirming that Section 7 of the Biosecurity Act has been met.</p>	<p>Recommended to incorporate at the start of Section 2.2 Legislative Framework plus DOC’s feedback and retain Sections 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5 without duplication.</p>

tempered by Section 7 of the Biosecurity Act (subsections (5) and (6)):

“(5) The provisions of the Wild Animal Control Act 1977 and the Game Animal Council Act 2013 do not apply to prevent or inhibit the exercise of any powers under the Biosecurity Act 1993 on any land (other than land administered under the Acts listed in Schedule 1 of the Conservation Act 1987) when those powers are used in respect of—

(a) a pest; or

(b) an unwanted organism—

that may be transmitted by any animal to which the Wild Animal Control Act 1977 or Game Animal Council Act 2013 applies.

(6) The provisions of the Wildlife Act 1953 (including any regulations made under that Act)—

(a) do not apply to prevent or inhibit the exercise or performance of any powers, functions, or duties under

<p><i>this Act when those powers, functions, or duties are exercised or performed in respect of an unwanted organism; and</i></p> <p><i>(b) do not allow or authorise the contravention of any provision of this Act in respect of wildlife that is also an unwanted organism.”</i></p> <p>Decision Sought:</p> <p>Revise this section to correctly represent the relationship between enactments as set out in Section 7 of the Biosecurity Act.</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>This section of the Proposed RPMP identifies Tasman District Council as the sole Management Agency responsible for implementing the RPMP. However, both DOC and NCC are identified as a ‘Responsible Party’ for particular pest species in</p>	<p>It is important that clarification sought by the submitter is made and therefore the following points are made:</p> <p>Section 3.1 notes that TDC is the management agency with (overall) responsibility for implementing the RPMP (as per Section 70(2)(k) of the Biosecurity Act) and the tasks outlined in Section 3.1 of the Proposal. Further, TDC has an agreement with Nelson City Council to act as the management agency with regard to general biosecurity matters that affect both territorial authorities (including RPMP development).</p>	<p>Agree with the submitter’s concerns and staff response to the submission which is to revise wording within 3.1 and Table 2 (now Table 1 in the amended Plan).</p>

<p>later sections of the Proposed RPMP. It would therefore be helpful to clarify the relationship between the 'Management Agency' (TDC) and a 'Responsible Party' (DOC/NCC), and what functions/ powers can be exercised by a 'Responsible Party'.</p> <p>Decision Sought:</p> <p>Add text to clarify the relationship between the 'Management Agency' (TDC) and a 'Responsible Party' (DOC/NCC), and what powers/functions a 'Responsible Party' can exercise under the Biosecurity Act and/or RPMP.</p>	<p>The Act is very enabling legislation and Councils can develop approaches that best work for their regions. Pest management is a considerable undertaking and requires coordination, partnership and joining/sharing of resources. Essentially TDC cannot do this on its own. Other parties have agreed to be involved in managing pest programmes under the RPMP. Two such examples are:</p> <ul style="list-style-type: none"> • DOC – pest fish and Spartina management. • NCC - Taiwan cherry management. <p>These agencies are probably better classified as the 'lead management agency' for those particular pests and this point can be made more explicit in Table 2 (instead of 'responsible party'). For other pests TDC is the lead agency (for most eradication pests) and this is clearly set out.</p> <p>To provide the clarification sought the Councils can appoint (through their Principal Officer or CEO) authorised persons (APs) under section 103(3) of the Act, having certain criteria to meet (section 103(4)). APs are not restricted to local or regional government employees (section 103(5)). The key point however, is that only APs can utilise powers and functions set out in the Act (i.e. those contained in section 8 of the proposal).</p>	
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	<p>Other parties may act on behalf of the management agency, subject to holding appropriate authorisations. In summary, changes could be made to the Proposal as follows:</p> <ul style="list-style-type: none">• Section 1.3 amended to include TDC having <u>overall</u> management agency responsibility <u>under Section 70 (2)(k)</u>.• Section 1.3 also include other agencies employees could be authorised under the Biosecurity Act by the Councils (and make this link in Section 8 also).• Table 2 be amended to note '<u>lead management agency</u>' for each pest.• No changes are required to the glossary or the pest specific rules and explanations. <p>(Note: See also related submission part 16796 on Page 17).</p>	
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<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>The wording of this section should be clarified as it initially states that all Crown agencies will be bound by the Good Neighbour Rules in the Proposed Plan; but then states that there are no Good Neighbour Rules in the Proposal.</p> <p>This section could also usefully signal DOC's role as the 'Responsible Party' for Pest Fish and Spartina, and what this entails.</p> <p>The Councils should also clarify the status of the 'Boundary Rules' included in the Proposed Plan (refer to later submission on this); it appears that they are intended to operate as 'Good Neighbour Rules' but, as they are not identified as such, the statutory</p>	<p>There is value in making the boundary rules for gorse and broom (outside of the Howard-St Arnaud area) as Good Neighbour Rules, so a section describing the Good Neighbour Rule concept needs to be kept.</p> <p>See note above regarding the re-phrasing of DOC's roles as being better described as 'lead management agency' rather than 'Responsible Party'.</p>	<p>New analysis by staff and independent consultants indicates that the inclusion of a good neighbour rule is warranted for both gorse and broom – see 6.4.18 and 6.4.19 in the amended Plan.</p>
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<p>provisions pertaining to such rules do not apply.</p> <p>Decision Sought:</p> <p>Delete current text and replace with the following:</p> <p><i>“A good neighbour rule in a plan, or action taken under a plan to enforce a good neighbour rule in the plan, are the only ways in which a plan may cause the Crown to become liable to meet obligations or costs. There are no Good Neighbour Rules in this Proposal, but the Councils will continue to work closely with Crown agencies to deliver the objectives of this Plan.”</i></p> <p>Add text to note DOC’s role as the ‘Responsible Party’ for Pest Fish and Spartina, and to identify the functions/powers that can be exercised by DOC under the RPMP.</p>		
<p>Submitter:</p>	<p>As above.</p>	<p>New analysis by staff and independent consultants indicates</p>

<p>16797 Nelson Forests Ltd</p> <p>16798 Federated Farmers</p> <p>Matter:</p> <p>3.3.2</p> <p>This section states: <i>it is proposed that Crown agencies will be bound by the Good Neighbour Rules in this proposed plan.</i> Then continues by stating: <i>However, there are no Good Neighbour Rules in the proposal and that the councils will continue to work closely with Crown Agencies to deliver the objectives of this Plan.</i></p> <p>The proposed Regional Pest Management Plan also states: [Good Neighbour Rules should be applied so] <i>that all land is treated equally, and no occupier is inflicting unfair or unreasonable costs on others.</i> This approach is not equitable and does not provide clear outcomes or plans.</p> <p>Decision Sought:</p> <p>Treat the Crown the same as anyone else.</p>		<p>that the inclusion of a good neighbor rule is warranted - see 6.4.18 and 6.4.19 in the amended Plan.</p>
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<p>Submitter: 16993 Nelson City Council</p> <p>Matter: Extend the duration of the RPMP to 2038.</p>	<p>Section 100D of the Biosecurity Act requires a review to be initiated after 10 years anyway. Some pests will be managed for a period longer than 10 years, as suggested by inclusion of sustained control and progressive containment categories.</p>	<p>Considered but deemed to be redundant.</p>
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5. Part Two Matters – Organisms Declared (4) and Pest Management Framework (5)

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>Staff support the inclusion of pest fish species (Gambusia, Koi carp, Perch, Rudd, Tench) and Spartina, and can confirm that DOC is willing to be identified as the ‘Responsible Party’ for these pests. The inclusion of these pests, and the specific programmes that apply, will enable the continuation of the work that DOC has been doing, in collaboration with the Councils, under the previous</p>	<p>DOC clearly supports the inclusion of Spartina (and staff also) being named in the RPMP. There is also strong support for pest fish, even though the Biosecurity Act linkages with DOC’s and Fish and Game New Zealand’s responsibilities towards managing them under the Freshwater Fisheries Regulations 1983 - sports fish (Schedule 1) or noxious fish (Schedule 3) are not clear. There has been good prior collaboration in the Tasman-Nelson region with DOC over pest fish and there may be little appetite to change this approach.</p> <p>However, since the RPMP was proposed, staff have met with regional Fish and Game New Zealand representatives (they administer sports fish like tench), who advised that they were ‘<i>not concerned about tench</i>’ and would even go as far as supporting an application for their legal release (if made). The position of DOC on this debate is not clear at present</p> <p>Option 1 would be to treat all introduced ‘pest fish’ together (as covered under the Regulations) and as outlined in the specific rule 6.2.2 (for pest fish – gambusia, tench, rudd and perch) in the current Proposal – the status quo.</p>	<p>Councilors support retention of Option 1.</p>

<p>Regional Pest Management Strategy.</p> <p>Decision Sought:</p> <p>Retain pest fish and Spartina as organisms classified as pests, subject to the management programmes specified in Table 2, with DOC as the ‘Responsible Party’.</p>	<p>Option 2 could be to omit just tench from this list, but only following due diligence/discussion with DOC and others, considering long term ramifications and any precedence that may be set. There would have to be very good justification to drop one ‘fish species/sports fish’ from the named list, while keeping others on the list (rudd and perch) – so DOC (and probably iwi) input into the decision is crucial and a unanimous outcome in support of the move to drop tench would seem a logical step.</p> <p>Option 3 could be to ‘drop’ pest fish from the RPMP altogether and include some or all of them under the TDC/NCC Bio Strategy – a non-regulatory approach (as some councils have chosen to do), however access to Biosecurity Act powers would not be available under this scenario.</p> <p>Regardless of the outcome of the ‘tench debate’, and as per a prior submission point from DOC, seeking clarification, renaming ‘responsible party’ to ‘lead management agency’ for these pests makes it clearer the management intent for them.</p>	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p>	<p>Staff agree in principle (regarding Section 4.3) although the situation is rather complex. There are both Unwanted Organisms (UOs) and Notifiable Organisms (NOs) at a national scale managed by MPI. UO’s are determined by the chief technical officer at MPI to be “... <i>capable or potentially capable of causing unwanted harm to any natural and/or physical resources or human health</i>”. Some of the pests in the Proposal are UOs, some are not (generally the worst pests are UO’s – Sabella is, gorse is not). There is no</p>	<p>That an extra column is incorporated in Table 2 and Appendix 2 identifying whether the organism listed is also classified as unwanted and for staff to consider ways to</p>

<p>Matter:</p> <p>Staff support the inclusion of this section in the Proposed RPMP, and it may be helpful to include specific links to the websites mentioned (for ease of reference); and/or to include an appendix which lists the species that have been declared Unwanted Organisms but are not designated as pests in the Proposed RPMP.</p> <p>Decision Sought:</p> <p>Include specific links to the websites mentioned and/or an appendix which lists the species that have been declared Unwanted Organisms but are not designated as pests in the Proposed RPMP.</p>	<p>definitive list, UOs can be searched online using the following link. www1.maf.govt.nz/uor/searchframe.htm</p> <p>Notifiable organisms are a list of pests and diseases that must be notified to MPI if spotted in New Zealand. The organisms are named in the Biosecurity (Notifiable Organisms) Order 2016, and include 10 invasive pest plants (including phragmites which is in the Tasman-Nelson RPMP Proposal).</p> <p>Other NOs listed but not relevant to this Proposal include: organisms affecting bees, crustaceans, amphibians, human health (e.g. mosquitos), marine and freshwater environments and all manner of others (e.g. horses, cattle, forestry and horticulture). Refer link below http://www.legislation.govt.nz/regulation/public/2016/0073/9.0/whole.html</p> <p>There is some merit in including the following link to MPIs website which contains a quick finder to the various lists, including the two specific links above. www.mpi.govt.nz/protection-and-response/finding-and-reporting-pests-and-diseases/registers-and-lists/</p> <p>An option to consider would be including an extra column in Table 2 identifying whether the organism listed is also a UO – with the following designation choice (Yes/No). It is not worth listing all the UOs as these are</p>	<p>incorporate links to national lists of UOs and notifiable organisms.</p> <p>(Note – references are now Table 1 and Appendix 2 in the amended Plan).</p>
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	<p>periodically changed and added to and there is no definitive list available, an organism requires to be searched for. The link however should remain constant for up to date listings.</p> <p>(Note: See also related submission part 17586 on Page 20).</p>	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>There are some slight differences in the wording of objectives between sections 5.1 and 6 of the Proposed RPMP; and also between the Proposed RPMP and the NPD. The wording should be checked and amended as necessary to ensure consistency within the RPMP.</p> <p>Decision Sought:</p> <p>Amend wording of objectives in either section 5.1 or section 6 of the Proposed RPMP where necessary to ensure</p>	<p>Staff generally agree with the submitter. Better wording can be inserted as follows, to be consistent with the NPD, although the ‘intermediate outcomes’ on page 21 contain the consistency sought by submitter:</p> <ul style="list-style-type: none"> • <i>Exclusion pests</i> – pg 20 and 24 – all wording is consistent (no change) • <i>Eradication pests</i> – pgs 20 and 26 – wording not consistent in objective but outcome is consistent • <i>Prog. Containment pests</i> – pgs 20 and 31 – wording not consistent – but outcome is. Need to add in the objective ‘... this Plan, contain or reduce • <i>Sustained control pests</i> – pgs 20 and 36 – wording not consistent but outcome is consistent. Need to add ‘provide for ongoing control’ and change adverse effects to ‘its impacts’ • Protecting values in places – pgs 20 and 45 - wording not consistent but outcome is consistent ... (see next point below to resolve issue). <p>It may be a better option to combine the relevant objectives (page 20) with the relevant intermediate outcomes (page 21) to reduce any confusion, and then align this new wording for each of the section 6 programmes – 6.1 - 6.5 accordingly. For example (eradication):</p>	<p>Accept changes recommended by staff including combining relevant objectives with intermediate outcomes into one section – refer to section 5.2.</p>

<p>consistency within the RPMP, and to ensure that wording is consistent with directions on setting objectives in NPD.</p>	<p><i>“Over the duration of this Plan, eradicate the pests listed in the Eradication Programme to eliminate their adverse effects, with the intermediate outcome being a reduction in infestation levels of each pest to zero levels in the Tasman-Nelson region.”</i></p>	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>There are some slight differences in the wording of the intermediate outcomes for the five programmes <i>of</i> the wording used in the NPD.</p> <p>Decision Sought:</p> <p>Amend wording of intermediate outcomes where necessary to ensure consistency with directions on programme descriptions in NPD.</p>	<p>Staff recommend amend 5.2 to accurately reflect the NPD wording.</p>	<p>Accept the staff recommendation.</p>

<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>This section does not reference actions that may be undertaken by agencies other than Council, e.g. by DOC and NCC, which are identified as the 'Responsible Party' for one or more pest species and assigned roles or responsibilities in other sections of the Proposed RPMP.</p> <p>Decision Sought:</p> <p>Amend to include reference to actions that may be taken by other agencies (DOC and NCC) when acting as a 'Responsible Party'.</p>	<p>As per clarification sought by the submitter (see also above submission regarding responsible parties and management agency responsibilities), section 5.3 could be amended to make it clearer, as follows:</p> <ul style="list-style-type: none"> • 5.3 (2) 'Council inspection' be renamed just 'Inspections' and the action be expanded to read 'Inspection by Council staff <u>or other authorised persons</u>' may include ... • 5.3 (3) under 'service delivery' the action could be expanded to include – 'Council, <u>or other management agencies with pest management responsibilities under this RPMP</u>' may deliver the service: then (a), (b) and (c) as stated. <p>(Note: See also related submission part 16796 on Page 11).</p>	<p>Accept the staff recommendation for rewording Section 5.3 (2 and 3).</p>
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<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>It is important to record that rules place legal obligations on landowners/occupiers, particularly if the RPMP specifies that breaching the rule is an offence under the Act.</p> <p>The information on Good Neighbour Rules provides an incomplete summary of the requirements specified in the NPD. For example, there is an additional requirement that, in the absence of the rule, the pest would spread to land that is adjacent or nearby and would cause unreasonable cost to an occupier of that land; and the GNR obligation is limited to managing the spread sufficiently to keep the costs</p>	<p>Agree.</p> <p>Further general explanation of the Good Neighbour Rules is warranted if these are introduced for gorse and broom.</p> <p>A section describing “agreed management plans” will be needed if these are to be adopted as a means of achieving the intent of the RPMP.</p> <p>Some rules (particularly boundary control rules) may need a subtle change to introduce the “agreed management plan” concept.</p>	<p>New analysis by staff and independent consultants indicates that the inclusion of a good neighbor rule is warranted. Include a section describing agreed management plans and amend rules to provide for accordingly - see 6.4.18 and 6.4.19 in the amended Plan.</p>
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<p>imposed on the occupiers of adjacent or nearby land below the 'unreasonable' threshold.</p> <p>In some Regional Pest Management Plans there is provision for setting aside the specific requirements of a rule if there is an agreed management plan that will achieve the outcomes desired by the plan. This can provide some flexibility for the Councils to work with landowners/occupiers and other agencies, without landowners/occupiers being in breach of a rule or committing an offence under the Biosecurity Act. A provision of this form may be warranted for at least some of the rules in the Proposed RPMP.</p> <p>Decision Sought:</p> <p>Amend first paragraph to include statement that rules</p>		
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<p>place legal obligations on landowners /occupiers.</p> <p>Amend text on Good Neighbour Rules to accurately reflect the requirements specified in clause 8(1) of the NPD.</p> <p>Consider including provision for setting aside the specific requirements of a rule if there is an agreed management plan that will achieve the outcomes desired by the plan.</p>		
<p>Submitter</p> <p>17586 MPI</p> <p>Matter:</p> <p>Is generally consistent with NPD.</p> <p>Reference to Good Neighbour rules needs removing as there are not any.</p>	<p>Note as above – a section on Good Neighbour Rules to be retained.</p>	<p>New analysis by staff and independent consultants indicates that the inclusion of a good neighbor rule is warranted. Include a section describing agreed management plans and amend rules to provide for accordingly - see 6.4.18 and 6.4.19 in the amended Plan.</p>

<p>Submitter</p> <p>17586 MPI</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>Matter:</p> <p>Section 4.3 As Cape tulip, Water Hyacinth and Johnson grass were once present in the area they should be treated the same as Phragmites and accorded the status of exclusion pests.</p> <p>Decision Sought:</p> <p>Add marine unwanted organisms to S 4.3 including Sabella Styela and Undaria.</p>	<p>There are two ways the Councils can go on the first part (pest plants) of this submission point to achieve consistency. Options include:</p> <p>Option 1: Add Cape tulip, water hyacinth and Johnson grass to the exclusion lists along with Phragmites; or</p> <p>Option 2: Drop Phragmites from the exclusion list altogether – as it is a pest plant previously eradicated from near Murchison and like the 3 plants above are not currently known in the district.</p> <p>Discussion:</p> <p>By including these three NIPR pests in the RPMP, it may give readers a false impression that TDC/NCC are responsible for the four plants overall (when in fact these are MPI led and managed pests). TDC/NCC may be interested parties but would not generally be involved in their control, nor are they resourced to do it.</p> <p>(Note: See also related submission part 16796 on Page 16).</p> <p>It is not impossible that the other five NIPR species could ‘turn up’ in the TDC/NCC areas (other are Manchurian wild rice, white bryony, salvinia, pyp grass and hydrilla) in the future.</p> <p>www.mpi.govt.nz/protection-and-response/long-term-pest-management/partnerships-programmes-and-accords/</p>	<p>Concur with the staff recommendation to include the four NIPR plants pertinent to this region for consistency and incorporate at the start of Section 4.3 the wording suggested (and add to exclusion pests category – section 6.1).</p> <p>Incorporate information about Styela and Undaria in Appendix 5.</p> <p>Staff to review the introduction to include reference to Appendix 5.</p> <p>(Note Appendix 5 is now 2 in amended Plan).</p>
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	<p>For the sake of consistency the NIPR plants/programme should be ‘all in’ or ‘all out’ of the Plan. If ‘out’ then they could be included under a wider surveillance brief in the TDC/NCC Bio Strategy as most are environmental pest plants.</p> <p>Alternately, it is not much extra work to include the three plants in Tables 2 and 3 accordingly, given they have some historical connection to the TDC area, having been previously detected in the district.</p> <p>For further clarification it would be useful to add to the beginning of the current section 4.3 wording, the following (as it also addresses matters around marine organisms):</p> <p><i>‘Not all harmful organisms are addressed in this Plan. There are several other mechanisms which support and complement the RPMP provisions. A number of species have been declared unwanted organisms nationally under the Biosecurity Act 1993. They include:</i></p> <ul style="list-style-type: none"> • <i>National Interest Pest Responses (NIPR) programme</i> • <i>National Pest Plant Accord (NPPA) – some of these are named pests in the RPMP</i> • <i>National Pest Pet Biosecurity Accord (NPPBA)</i> • <i>Other organisms declared unwanted organisms and <u>are</u> included in the RPMP (e.g. marine organisms Sabella spallanzanii)</i> • <i>Other organisms that are declared unwanted organisms that are not covered above and <u>are not</u> included in the RPMP (e.g. marine organisms Styela clava and Undaria pinnatifida)’. </i> 	
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6. Programmes and Pests – (Section 6)

6.1 Overall general support for any programmes/pests as listed in RPMP

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16795 Mr Roy Bensemam 16888 Ms Gillian Bishop 17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>Agree with the species included in the RPMP Proposal.</p>	<p>These submitters have made statements supporting the programmes or species included within the Plan Proposal.</p>	<p>The support is noted with thanks.</p>
<p>Submitter:</p> <p>16788 Mr Martin Willetts</p> <p>Matter:</p> <p>Agree with Yellow Bristle Grass, Chilean Needle Grass, Giant Buttercup, wilding conifers, velvetleaf gorse, broom and ragwort.</p>		<p>The support is noted with thanks.</p>
<p>Submitter:</p> <p>17580 Project Janszoon X18113 Project De Vine Trust</p>		<p>The support is noted with thanks.</p>

<p>Support</p> <p>Matter:</p> <p>Progressive containment over parts of the Tasman region for banana passion vine, wild ginger and old man’s beard are supported (Maps 3,6,7).</p>		<p>Note: progressive containment listings have changed since deliberations, with these 3 plant pests moved into sustained control programmes, but in the main for the same areas. Refer to specific section below for each pest.</p>
<p>Submitter:</p> <p>17583 Project De-Vine Trust</p> <p>Matter:</p> <p>Support current proposal for Progressive containment throughout the region for Yellow or Italian Jasmine.</p>		<p>The support is noted with thanks.</p>

<p>Submitters:</p> <p>14859 Forest and Bird</p> <p>X18113 Project De Vine Trust</p> <p>Support</p> <p>Matter:</p> <p>Yellow Jasmine should be in the RPMP.</p>		<p>The support is noted with thanks.</p>
<p>Submitter:</p> <p>17583 Project De-Vine Trust</p> <p>Matter:</p> <p>Support current proposal for Progressive containment Golden Bay for Woolly nightshade.</p>		<p>The support is noted with thanks.</p> <p>Note: new control category is now sustained control but area is the same.</p>
<p>Submitter:</p> <p>17583 Project De-Vine Trust</p> <p>Matter:</p> <p>Support adding Riwaka and Marahau to the Banana Passionfruit Progressive control area.</p>		<p>The support is noted with thanks.</p> <p>Note: new control category is now sustained control but area is the same.</p>

<p>Submitter:</p> <p>17584 Royal Forest & Bird Protection Society of NZ</p> <p>Matter:</p> <p>Forest & Bird supports the inclusion of a number of new pests into the table, especially the red-eared slider turtle, and the plant pest species around St Arnaud. The two bird species Indian Myna and Indian Ring-Necked parakeet are also supported for their focused action.</p> <p>Chocolate vine is a new addition, and we are pleased to see its inclusion in the RPMP as it has significant biodiversity effects.</p> <p>Section 6.1 Exclusion Pests</p> <p>Forest & Bird supports the current lists of pests identified for exclusion.</p> <ol style="list-style-type: none"> 1. Retain the current list of pests in the exclusion list. <p>Section 6.2 Eradication Pests</p> <p>Forest & Bird supports the current lists of pests identified for eradication.</p> <ol style="list-style-type: none"> 1. Retain the current lists of pests in the eradication list. 2. Support the retention of boneseed and feral rabbits in the site specific areas identified. 		<p>The support is noted with thanks.</p>
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<p>Submitter</p> <p>17584 Royal Forest & Bird Protection Society of NZ</p> <p>X 8113 Project De Vine Trust Support</p> <p>Matter:</p> <p>Retain the current items for sustained control, with especial support for chocolate vine and yellow flag.</p>		<p>The support is noted with thanks.</p>
<p>Submitter</p> <p>17586 MPI</p> <p>Matter:</p> <p>Support inclusion of Velvetleaf as an exclusion pest.</p>		<p>The support is noted with thanks.</p>

6.2 Species not included in the RPMP (and have been requested to be included)

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>14848 Mr Bryce Buckland</p> <p>Matter:</p> <p>Decision Sought:</p> <ul style="list-style-type: none"> • Include Magpies in RPMP. • Include Black Swan in RPMP. 	<p>Magpie are considered to be widespread in the Tasman - Nelson area. Cannot include in RPMP without good information on the location of core infestations in relation to high value native ecosystems, and information on effectiveness of control. A moderate level (quantitative CBA) is required. A non-regulatory biodiversity strategy/site-led approach may be better.</p> <p>Swans: No change. They are native to New Zealand and managed by New Zealand Fish and Game.</p>	<p>Consider ways of increasing awareness about Australian Magpies and retaining Golden Bay as an area they are excluded, including incorporating a programme within Golden Bay.</p> <p>(see new rule 6.2.9 –added also to new Appendix 2)</p>
<p>Submitters:</p> <p>14849 Forest & Bird Protection Society of NZ</p> <p>Matter:</p> <ul style="list-style-type: none"> • Include cherry laurel • Include Cretan Brake (<i>Pteris cretica</i>) • Include Veldt grass (<i>Ehrharta erecta</i>) • Include Male fern 	<p>These species are distributed throughout Nelson Tasman area particularly urban areas.</p> <p>By bringing them into the RPMP they would be subject to rules even in urban settings and would also be banned from propagation, sale or display within the Tasman – Nelson area.</p>	<p>Include the species raised by submitters in Appendix 2 and promote inclusion in national pests lists.</p> <p>Consider Spanish heath as part of any plan change to introduce a site led programme for wilding</p>

<ul style="list-style-type: none"> • Include Fan palm • Include Spanish heath 	<p>In specific areas of defined value the wildings of these species could be subject to site lead programmes.</p> <p>However even with community support there would be some council costs supporting volunteer groups and undertaking inspections to ensure Plan provisions were being complied with.</p> <p>Historically these types of plants have been dealt with through non statutory mechanisms outside the Plan such education and Weedbusters.</p>	<p>conifers in the Dun Mountain.</p> <p>Added to new Appendix 2 with Plan change potential noted.</p>
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<p>Submitters:</p> <p>17584 Royal Forest & Bird Protection Society of New Zealand</p> <p>X18113 Project De Vine Trust</p> <p>Support</p> <p>Matter:</p> <p>1. Include the following species:</p> <ol style="list-style-type: none"> a. Cherry laurel b. Purple pampas c. Spanish heath d. Argentine/Darwin’s ants e. Fan palm f. Climbing asparagus g. Sycamore h. Wilding conifers i. Brushtail possum j. Feral cats 	<p>See above.</p> <p>Yes wildings of these species can be invasive and impact on values but in many parts of the region they are way beyond our current capacity to control.</p> <p>The Plan Proposal does include provisions for some of these species in specific areas where they are not already widespread.</p> <p>These are best dealt with outside the RPMP through education and support perhaps through a Bio Strategy.</p>	<p>Include the species raised by submitters in Appendix 2 and promote inclusion in national pests lists.</p> <p>All species added to new Appendix 2. Some species are listed as pests in the RPMP, such as climbing asparagus – now a sustained control plant in eastern Golden Bay (refer to Map 6).</p>
<p>Submitters:</p> <p>16771 Mrs Pamela Pope</p> <p>X18124 Native Bird Recovery Richmond</p> <p>Support (hedgehogs only)</p> <p>Matter:</p>	<p>As above.</p>	<p>All species added to new Appendix 2.</p>

<ul style="list-style-type: none"> • Include Fan Palm • Privet (tree and Chinese) • Cotoneaster (large and small leaf) • Ivy • Creeping fig • Hedgehogs 		
<p>Submitters:</p> <p>16771 Mrs Pamela Pope</p> <p>Matter:</p> <ul style="list-style-type: none"> • Include argentine ants. 	<p>As above.</p>	<p>Include the species raised by submitters in Appendix 2 and promote inclusion in national pests lists.</p> <p>All species added to new Appendix 2.</p>
<p>Submitters</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>This programme could also be utilised for pests that are present in only part of the region, and where the objective is to prevent establishment in other parts of the region (where this is desirable, feasible and cost-effective).</p>	<p>A low level quantitative CBA has identified that an exclusion programme for Argentine and Darwin’s ants focused on specific areas where they are presently not found is cost beneficial.</p> <p>Such a programme would cost the Councils around \$30,000 per year (combined) for ongoing monitoring costs, with an estimated additional \$20,000 to deal with new incursions.</p>	<p>The Committee recognized the CBA as beneficial, however a site led programme will require additional funding of an estimated \$50,000 per annum which will require additional funding from Councils which is currently not available, therefore the submission was declined. An eradication programme</p>

<p>Argentine and Darwin’s ants are an example where a sub-regional exclusion programme could be applied. These species have not been included in Table 2, but are listed in Appendix 5 as ‘Organisms of Interest’ on the basis that they are a widespread pest in urban areas but there is lack of tools to control them on a landscape scale. However, they are not yet present throughout the region, and there may be an opportunity to exclude them from areas where they are not yet established, such as Golden Bay, through targeted interventions such as pathway management and/or rapid response to any incursions.</p> <p>The great white butterfly (<i>Pieris brassicae</i>) should be included in the RPMP as an exclusion pest. The Councils will be aware that from 2012 DOC led a multi-agency programme to eradicate the pest butterfly from Nelson Tasman where it was only known to be found. In November 2016, the great white butterfly was determined to be successfully eradicated and is no longer in New Zealand. However, a watch is still needed for this pest in case it turns up again in New Zealand; and immediate action will be required to respond to any detections and prevent its re-establishment. Further information on this pest is available at http://www.doc.govt.nz/great-white-butterfly</p> <p>Decision Sought:</p>	<p>Regarding Great White Butterfly, the submitter notes that DOC was successful in eradicating this pest from New Zealand. Therefore any reestablishment of Great White Butterfly will be a national incursion and part of a national response lead by Central Government. The Regional Pest Management Plan does not deal with national incursions of everything that could arrive in New Zealand.</p>	<p>would most likely be unsuccessful because of the way the ants are brought into the district through nesting in vehicles, pot plants and general freight. The discovery of these migrations would be near impossible to detect with the amount of traffic and travellers to the Golden Bay region.</p> <p>Ant species as noted have been added to new Appendix 2, also great white butterfly has been added.</p>
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<p>Undertake cost-benefit analysis for exclusion programme in discrete areas where Argentine and Darwin's ants are not yet established (eg Golden Bay); and include these species in Tables 2 and 3 if the programme is found to be feasible and cost-effective.</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>The great white butterfly (<i>Pieris brassicae</i>) should be included in the RPMP as an exclusion pest. The Councils will be aware that from 2012 DOC led a multi-agency programme to eradicate the pest butterfly from Nelson Tasman where it was only known to be found. In November 2016, the great white butterfly was determined to be successfully eradicated and is no longer in New Zealand. However, a watch is still needed for this pest in case it turns up again in New Zealand; and immediate action will be required to respond to any detections and prevent its re-establishment. Further information on this pest is available at http://www.doc.govt.nz/great-white-butterfly.</p> <p>Decision Sought:</p>	<p>It is accepted that GWB is nationally eradicated. Therefore if it is found again in Tasman-Nelson it will be a New Zealand border breach and MPI will carry the responsibility for any national response (taxpayer not ratepayer).</p>	<p>Include Great White Butterfly in Appendix 5.</p> <p>Now new Appendix 2, also great white butterfly has been added.</p>

<p>Include great white butterfly (<i>Pieris brassicae</i>) in the Exclusion Pests Programme.</p>		
<p>Submitters: 16794 Golden Bay Branch of Forest and Bird</p> <p>Matter: Include Sycamore as a pest in Golden Bay.</p>	<p>Considered to be widespread and potentially difficult to manage as a pest. Cannot include in RPMP without good information on the location of core infestations in relation to high value native ecosystems, and information on effectiveness of control. A moderate level (quantitative CBA) is required. A non-regulatory biodiversity strategy/site-led approach may be better.</p>	<p>Include in Appendix 5 with emphasis on Golden Bay issues.</p> <p>Added to new Appendix 2, outside Abel Tasman National Park.</p>
<p>Submitters: 16795 Mr Roy Bensemenn</p> <p>Matter: Include Wild pigs. They cause damage to adjoining properties. Including in the plan would allow control to be required by council.</p>	<p>Wild pigs are named as a wild animal under the Wild Animal Control Act (WACA) 1977. They are highly mobile and widespread throughout the district across land of all tenures. As with many animals in the WACA, pigs can be a valuable resource (popular and valuable game animal and food source) or harmful (causing damage through rooting of the ground and vegetation or preying on new born lambs and eating indigenous invertebrates).</p> <p>Feral pig numbers are generally controlled by hunting pressure (although this is highly variable). Their effects are generally outweighed by those of possums, deer and goats. Options for consideration in the RPMP include:</p>	<p>Refer to Appendix 5.</p> <p>Added to new Appendix 2, noted as feral pigs, not wild pigs.</p>

	<ul style="list-style-type: none"> • Sustained control category – landowner control rules, to reduce externality effects on neighbouring properties, • Site led control – by TDC/DOC, to protect native vegetation at special places. <p>Eradication and progressive containment are unrealistic and from what staff know would ‘fail’ CBA tests, and exclusion is out of the question. Naming pigs as a regional pest and having rules would open a ‘can of worms’ with many hunting groups and probably iwi. Further, being such a highly mobile animal they can freely roam from place to place. ‘Who owns the pigs?’ would be highly debatable and enforcing control highly impractical.</p> <p>A site led approach under the Biosecurity Act/NPD is also limiting as particular sites need to be in named and included in the RPMP. Also, control plans would need to be submitted to the Minister of Conservation under section 31 of the WACA which would be overly onerous for most situations encountered.</p>	
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	<p>There are obvious impractical resource limitations for either of the above options. There is a third possibility that the Councils could explore - having wild pigs included in Appendix 5 of the RPMP as an 'organism of interest' or contained in the non-regulatory Bio Strategy as an 'organism on a watch list for future RPMP reviews or where pigs cause damage to a (unnamed in the RPMP) place during the next 10 years.</p> <p>Lastly, any change in category would trigger a medium level assessment under the NPD s.6(1) due to their controversial pest v resource potential. A medium level assessment is a lot more quantitative and there are not many reliable cost/benefit studies on wild pigs.</p>	
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<p>Submitter:</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p><i>Feral goat control</i></p> <p>No programmes or measures around feral goat control are included in the Proposed Plan. The Council should consider amending its Plan to include rules that allow goats to be managed to reduce the risk of goat reinvasion into areas of high biodiversity value, where sustained goat control programmes are already underway, such as Abel Tasman National Park. There is still additional work to be done in this regard, and the Councils will need to consider whether these matters can be addressed through the current process of submissions and hearings, or would need to be addressed through a subsequent partial review of the RPMP (under s100D of the Biosecurity Act). Project Janszoon would like the opportunity to contribute to this work. It is also noted that a range of approaches have been adopted by other regional councils, or are being proposed, and which merit consideration in the Tasman context (eg Canterbury, Hawkes Bay, Auckland.)</p> <p>Decision Sought:</p>	<p>Goats are highly mobile and found throughout the district across land of all tenures. In many places they are controlled to acceptable levels. Equally though, in many places they are not controlled at all. Being highly mobile and agile, goats roam over large areas. Impacts/control of feral goats should be managed under the Wild Animal Control Act 1977 (WACA), and arguably by DOC as the agency responsible. The reality is that, very much like in Marlborough District, they are widespread, and any control work carried out is pragmatically limited to those areas where some protection to biodiversity values is needed (such as Abel Tasman National Park).</p> <p>Management scenarios include:</p> <ul style="list-style-type: none"> • <u>Do nothing</u> – noting them as current as an ‘animal of interest’ (Appendix 5) might raise their profile, but unlikely. This option is the status quo under the current Proposal. The ‘do nothing’ approach doesn’t stop occupiers from carrying out goat control on their land. 	<p>Include in Appendix 5 with emphasis on the Abel Tasman and the Dun Mountain.</p> <p>Added to new Appendix 2, noting possible Plan change candidate in the future.</p>
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<p>Investigate options for how best to reduce the risk of goat reinvasion into areas of high biodiversity value, where sustained goat control programmes are already underway. This may need to be addressed through a subsequent partial review of the RPMP (under s100D of the Biosecurity Act).</p>	<ul style="list-style-type: none"> • <u>Sustained control</u> – Council could consider a rule such as that for Fireblight, where an area being controlled (the beneficiary) is responsible for the cost of control on the adjoining property’s which has feral goats (roaming). Would require an extensive CBA and probably a medium level NPD assessment process. • <u>Site-led approach</u>, protection of key sites. Many key sites are being protected currently without any regional intervention and sites have to be named in the RPMP and management plans pre-determined and detailed. <p>Inclusion of goats as a named pest and managed through a rule automatically makes it illegal for goats to be knowingly released or distributed. In reality this would be very difficult to police and any enforcement would be under the WACA (which is a drawn out affair) not the Biosecurity Act. In terms of a ‘Fireblight type’ rule, this approach would be problematic because goats are much more mobile than Fireblight – it would be difficult to ‘pin a goat mob’ on any particular occupier. Also, providing for the beneficiary to control goats or undertaking work (and funding it) means that exacerbators have no</p>	
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	<p>obligations around control or funding. Allowing for occupiers to enter neighbouring land (any land) could only be by mutual agreement. If a neighbouring occupier said no to access the beneficiary controller would require Biosecurity Act powers of entry and authorisation. This approach is rather messy and probably defeats the purpose.</p> <p>As noted by the submitter, feral goats may be a matter/potential programme to reconsider during a partial review of the RPMP, following a period of further dialogue with DOC, iwi, and groups like Project Janszoon and/or considered in light of the TDC/NCC Bio Strategy. TDC welcomes further dialogue on this matter with Project Janszoon and their contribution to the discussion.</p>	
<p>Submitters: 17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>Decision Sought: Include feral goats deer, chamois and tahr.</p>	<p>These four species are named wild animals under the Wild Animal Control Act (WACA) 1977, which deals with their recreational and commercial status. Nothing in the RPMP (via the Biosecurity Act) can derogate from the provisions contained in the WACA, which is confusing as to whether these animals should or could be categorized in the future as game animals or pests.</p>	<p>Include in Appendix 5.</p> <p>Added to new Appendix 2, the species noted under feral deer (except feral goats, noted in their own right). Chamois may be found in the Tasman region but not tahr.</p>

	<p>Feral goats are the most widespread of this group, then deer, then chamois (relegated to the high mountain tops). Chamois are seldom found in the district and DOC makes efforts to confine them to mid Canterbury mountainous areas. Goats especially, and (red) deer, are highly mobile and found throughout the district across land of all tenures. Deer are a resource for some (a popular and valuable game animal and food source) and harmful for others (causing damage by browsing vegetation). Goats have the same effects (more so on browsing impacts) but are not viewed in the same light as deer as a hunting resource.</p> <p>Deer should be able to be managed by hunting pressure and by DOC on public conservation land and the Councils may not have the appetite to get involved in feral deer control as it is not currently resourced. Arguable deer management lies solely with DOC, as WACA powers cover Crown and private land.</p> <p>Goats are a different matter and in many places are controlled to acceptable levels. Equally though, in many places they are not controlled at all. Being</p>	
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	<p>highly mobile and agile, they can cover large distances, therefore occupier rules (sustained control, as outlined in the Project Janszoon submission) are unlikely to be practicable or achievable, never mind what the CBA outcomes might suggest. Other management options, as also noted above, include:</p> <ul style="list-style-type: none">• <u>Do nothing</u> – note them as current as an ‘animal of interest’ (Appendix 5) – might raise their profile but unlikely.• <u>Site-led approach</u>, protection of sites. Many key sites are being protected currently without any regional intervention and sites have to be named in the RPMP and management plans detailed. <p>As submitter 17580 Project Janszoon notes, this may be a matter/potential programme to reconsider during a partial review of the RPMP, following a period of further dialogue with DOC, iwi and groups like Project Janszoon, or considered under the TDC/NCC Bio Strategy.</p>	
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<p>Submitter</p> <p>17586 MPI</p> <p>Matter:</p> <p>Add marine pests established in the rest of New Zealand which are not yet present in the Tasman/Nelson area including <i>Eudistoma elongatum</i>, <i>Pyura dopplelgera</i> and <i>Charybdis japonica</i> and also consider adding some established pests such as <i>Styela clava</i>.</p>	<p>These are unwanted organisms present throughout some areas of New Zealand and often spread via the movements of vessels and equipment. This is a Central Government responsibility and better dealt with via a national pathway management plan.</p>	<p>Include in Appendix 5 with emphasis that this is MPI's responsibility via a national pathway management plan.</p> <p>Added to new Appendix 2, species noted under 'marine pests' in general grouping.</p>
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6.3 Species included in RPMP, but changes requested in either the category, the area covered (map to be tabled).

6.3.1 Exclusion Pests

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>Staff support the inclusion of Koi carp within this pest programme. However, if DOC is to be identified as the 'Responsible Party' for this pest (as signalled in Table 2) then this will need to be reflected in the Principal Measures, and an additional Rule will also be required (equivalent to the Rule shown in section 6.2.2).</p> <p>Decision Sought:</p> <p>Amend Principal Measures and include additional Rule (equivalent to Rule in Section 6.2.2) as necessary</p>	<p>Drafting omission.</p> <p>Need to copy rule from 6.2.1 into 6.1.1</p>	<p>Review and amend rules accordingly.</p>

to reflect DOC's role as 'Responsible Party' for Koi carp.		
Submitters: Include reference to MPI Hotline (0800 809966) to report sightings of exclusion pests.	Staff agree.	Agree. Added as new footnote 4.

6.3.2 Eradication Pests

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 16769 Marlborough District Council</p> <p>Matter: If another agency (eg DOC) is to deliver some of the RPMP programmes (Pest fish – Spartina), they need to be Authorised Persons under section 103 BA.</p>	<p>Staff agree that this is the legal situation and the Plan Proposal should make that situation clear.</p>	<p>Agree with the submitter’s concerns and staff response to the submission which is to revise wording within 3.1 and Table 2 (now new Table 1).</p>
<p>Submitters: 16769 Marlborough District Council 17580 Project Janszoon</p> <p>Matter: Staff note that this programme is proposed for feral rabbits in Golden Bay, excluding Awaroa; however, the associated cost-benefit analysis</p>	<p>The CBA is not correct. Feral rabbits are also known to be on parts of the Takaka Hill and their full range has not been established. However numbers are generally considered to be very low. Therefore exclusion is not the correct category as they are already present.</p> <p>Feral rabbits should therefore remain as eradication and the CBA amended. The exclusion of Awaroa from the eradication programme does not make sense particularly as the Takaka Hill population is included in the eradication programme and the</p>	<p>Retain feral rabbits in the eradication pest programme extending Golden Bay to exclude Awaroa. Correct the CBA errors and other wording and maps as appropriate.</p> <p>Accordingly, rule 6.2.8 is amended, old map removed, and CBA document updated.</p>

<p>states that there have been no reports on the presence of feral rabbits in Golden Bay outside Awaroa. This suggests that Exclusion may be the more appropriate programme for this species in Golden Bay, outside Awaroa (referring to the objectives for two programmes).</p> <p>The Eradication pests programme could also be utilised for ‘outlier’ infestations of other pests, where remote from ‘core’ infestations, and where eradication from at least part of the region is desirable, feasible and cost-effective.</p> <p>Decision Sought:</p> <p>Delete feral rabbits (Golden Bay excluding Awaroa) from the Eradication pests programme and include in exclusion pests prog.</p> <p>Assess potential to include other species as Eradication Pests in parts of the Tasman-Nelson Region, where eradication from at least part of the</p>	<p>RCD K5 virus has been released at Awaroa. Staff recommend that the Awaroa exclusion should be removed from the RPMP with the consequent deletion of Map 2.1.</p> <p>We also note Map 9 and 9.1 P 75 & 76 related to feral rabbit sustained control should not be in the RPMP. There are no rules attached and it needs to be removed as a technical edit.</p> <p>Note Review Description in Table 5 P30 which does not cover the impacts of feral rabbit’s as well as it might.</p>	
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region is desirable, feasible and cost-effective.		
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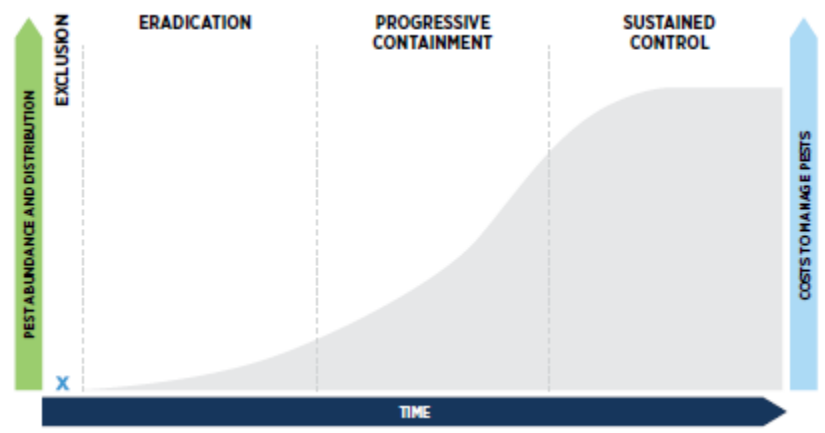
6.3.3 Progressive Containment Pests

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>14832 Mrs Pauline Schurmann</p> <p>X18109 Julie Reed</p> <p>Support</p> <p>X18112 Owen and Doreen Bateup</p> <p>Support</p> <p>X18113 Project De-Vine Trust</p> <p>Support</p> <p>X18120 Julie and Dan Anderson</p> <p>Support</p> <p>X18121 Jennifer Thomas</p> <p>Support</p> <p>X18122 Alan and Lois Brookes</p>	<p>Staff consider climbing asparagus very widespread outside the Progressive containment area currently defined in the plan to reasonably require landowners to undertake control. This may be dealt with through support of community and landowner group initiatives under a bio strategy</p>	<p>Expand map to include the area as advised by staff. In Appendix 5 emphasise that with more community group initiatives the area in the plan can be expanded in the future.</p> <p>Climbing asparagus has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 6. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives emphasis.</p>

<p>Support</p> <p>X18123 Ross & Celia McKechnie</p> <p>Support</p> <p>Matter:</p> <p>Include Pakawau and Mt Burnett to Westhaven in Climbing Asparagus Progressive Containment programme</p> <p>Decision Sought:</p>		
<p>Submitters:</p> <p>16766 Mrs Glennis Davenport</p> <p>16773 Mrs Coralie Grooby</p> <p>16774 Mrs Heather Brooks</p> <p>16775 Miss Jacqui Jenkins</p> <p>16785 Mr Marcel Creighton</p> <p>16786 Mr Murray Thorn</p>	<p>A number of individual/group submissions wanted the Councils to extend the Old Man’s Beard (OMB) progressive containment (PC) area to include the Motueka Valley, from Woodman’s Corner to Kohatu (refer map following page), essentially linking the proposed PC areas of Golden Bay/Riwaka and Upper Buller (GB/UB).</p> <p>The rationale for limiting the PC areas to that proposed is due to the scale of infestations. In the GB/UB areas OMB is rated as ‘4’ on the infestation curve (see graph below) – being just on the rise up the curve, near or past the eradication/progressive containment vertical line. In all other parts of</p>	<p>In Appendix 5 emphasise that with more community group initiatives the area in the plan can be expanded into the Motueka Valley in the future.</p> <p>Following deliberations, Old man’s beard has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated,</p>

16787 Mr Greg Mason
 16788 Mr Martin Willetts
 16789 Mrs C A L Davidson
 16790 Mr Norman Carrington
 16791 Mr Daniel Bulman
 16792 Mr Mark Platt
 16878 Mr Joel Briffault
 16879 Mr P W Hartley
 16880 Mr M J Macale
 16881 Mr Charlie A Ablett
 16882 Ms Vicki Adnams
 16883 Mr Peter Cook
 16884 Mr Bruce Dyer
 16885 Mrs Rose Beatson
 16886 Ms Katherine Crick
 16887 Mr Frederick J Hickling
 16888 Tasman Environmental Trust
 16889 Mrs Marguerite Green

the district it is rated as '7' which is close to reaching its full extent and potential (where the curve starts to flatten out at the top).

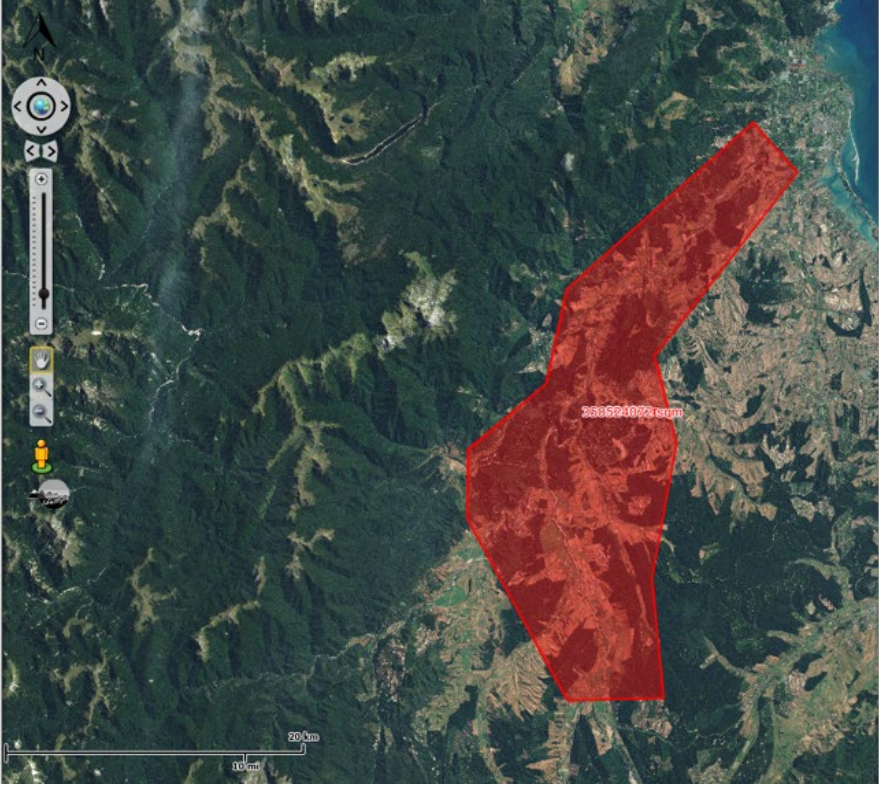


However, it is appropriate to consider all the options, which include:

- Decline and do nothing, leave OMB in progressive containment, just in the GB/UB areas – this is a better outcome in terms of CBA.
- Widen the progressive containment zone to include this area, with the same total property clearance rule as for GB/UB.

including a new map 8. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives emphasis and expansion opportunities.

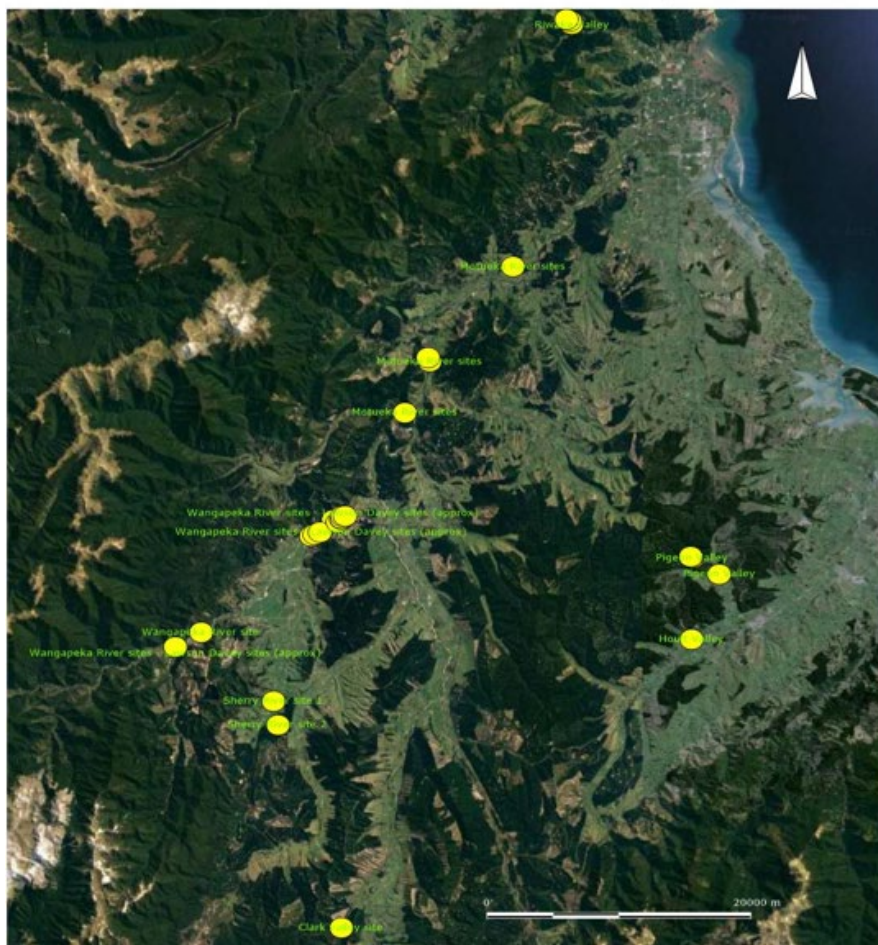
16890	Ms Lisa Hood	<ul style="list-style-type: none"> Widen the <u>progressive containment</u> zone to include this area, but with TDC/NCC assuming direct control for plants in this new area. <p>At the RPMP hearings the community association reps wanted the additional area included in the PC category but <u>did not want</u> occupier rules included. Alternately, if TDC was to assume a service delivery role in this area, that would be very onerous and would require significant increased resources, with no guarantee of success due to the heavy infestations present.</p> <p>Another practicable approach would be not to put OMB in the Motueka Valley area in the RPMP P.C. categorization but to provide support (through the TDC/NCC Bio-Strategy) to community and landowner initiative groups outside the RPMP (would need still a major commitment). TDC would monitor work and if progress is being limited by access to a small number of properties then RPMP rules might be needed (if so, could be introduced by way of Plan review). Finally, in the near future biological control may start to deliver some good outcomes for OMB.</p>	
16891	Mr Karsten Schroder		
16892	Mr Bruce Stare		
16893	Mr Alan D Shapcott		
16894	Mr Alan Bensemam (note: wanted all TDC and NCC)		
16895	Ms Jane Coleman		
16896	Ms Bernadette Cook		
16897	Ms Carol Noakes		
16898	Mr Arthur Heckler		
16899	Ms Jennifer Dunbar		
16900	Ms Irma Jager (but no spray just paste)		
16901	Ms Maya Mosimann		
16902	Mr and Mrs D.E. Canton		
16903	Mr Trevor Knowles		
16904	Mrs Joan Ann Walker		
16905	Miss Krista de Blauw- Kuis		

<p>16906 Mr Gavin O'Donnell</p> <p>X18113 Project De Vine Trust</p> <p>Support all this group</p> <p>Matter:</p> <p>Include Old Man's Beard as a progressive containment pest in the Motueka Valley from Woodman's corner through to Kohatu (map provided).</p>		
<p>Submitters:</p> <p>16795 Mr Roy Bensemam</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p>	<p>As above.</p>	<p>In Appendix 5 emphasise that with more community group initiatives the area in the plan can be expanded into the Motueka Valley in the future.</p> <p>Following deliberations, Old man's beard has been moved</p>

<p>Matter:</p> <p>Include Old Man’s Beard as a progressive containment pest in the Motueka Valley from the headwaters down.</p>		<p>to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 8. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives emphasis and expansion opportunities.</p> <p>New Appendix 2 notes possible expansion opportunities.</p>
<p>Submitters:</p> <p>16768 Nelson Marlborough Fish & Game Council</p> <p>Matter:</p> <p>Move Knotweeds from progressive containment to eradication</p>	<p>There is no doubt that knotweeds in many parts of the country are highly invasive and capable of displacing native plants and reducing indigenous biodiversity values. There are approximately 23 known sites in the region – including Motueka, Wangapeka and Sherry rivers and the Hout, Pigeon and Riwaka Valleys (see map following). An accurate survey and costing of control at these sites will not be available until just prior to the workshop (c.20th June - verbal update to be provided by staff). This information will however help inform the CBA process.</p> <p>Options to address this submission include:</p>	<p>Move to eradication and occupiers responsible for control. Where the land is owned privately, TDC assists with an eradication management plan.</p> <p>Noted in new Table 3 and new rule 6.2.5.</p>

	<ul style="list-style-type: none"> • <u>Decline and do nothing</u>, leave in progressive containment • Accept and <u>move to eradication</u> and TDC is responsible for control • Accept and move to <u>eradication and occupiers are responsible</u> for control. <p>Any change in category would likely only trigger a low level assessment under the NPD s.6(1). Eradication status is appropriate given its invasiveness and currently limited distribution and land occupiers assuming control is a valid option, given TDC’s limited resources. However, as it occurs near riparian margins, determining who actually owns the land the plants are on could be problematic and time consuming. Knotweeds are also difficult to control with herbicide and require a keen focus and attention by those controlling them. Some aquatic herbicides also require specific consent from the EPA to use. These limitations may make it beyond the capability of most landowners to undertake eradication attempts.</p> <p>Wilding kiwifruit is the only other pest plant in the eradication category with occupier control responsibility, the other 11 are agency controlled pests (DOC/TDC). Regardless of the final determination, inclusion of knotweeds in the RPMP has overall strong regional community benefits. Any change in category needs to be reflected in Tables 4 and 6, respectively.</p>	
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TDC - Asiatic Knotweed sites - June 2018 Survey



<p>Submitters: 16771 Mrs Pamela Pope</p> <p>Matter: Extend Wild Ginger area to all Nelson-Tasman</p>	<p>Based on the observations of the Tasman Biosecurity officers Wild Ginger does not appear to be invasive in areas outside Golden Bay</p>	<p>Remains in the smaller area following officer advice that wild ginger is considered to be more invasive in the Golden Bay micro climate.</p> <p>Following deliberations, wild ginger has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 13. No occupier rules are envisaged outside the mapped area.</p>
<p>Submitters: 16796 Northern South Island Department of Conservation 17580 Project Janszoon</p> <p>Matter: The intermediate outcome for a progressive containment programme (stated in the NPD) is “to contain or reduce the</p>	<p>The submitter is technically right regarding the intermediate outcome being to contain/reduce the geographic spread over time, to an area. However, there is nothing to strictly state that ‘a contained area’ cannot be defined as the whole district, or Tasman-Nelson region. Nonetheless, staff have considered the various options and reviewed those species in Table 6 where a clearly defined area that they can be better contained to is not readily identifiable. A possible solution is that the following plants be reassigned to the sustained control category (for the whole region):</p> <ul style="list-style-type: none"> • chocolate vine • <i>Gunnera</i> 	<p>Committee agreed with staff recommendation to reassign: banana passion vine, chocolate vine, climbing asparagus, <i>Gunnera</i>, old man’s beard, Queensland poplar, wild ginger, yellow flag and yellow jasmin to the sustained control programme and for the remaining seven pests to have clearly mapped containment areas.</p>

<p><i>geographic distribution of the subject, or an organism being spread by the subject, to an area over time” (emphasis added).</i></p> <p>This suggests that that the RPMP should identify the specific area(s) that each containment pest is to be contained within, or restricted to, over the term of the RPMP. This is not reflected in the containment pest programmes included in the Proposed RPMP, which generally apply across the whole region, or significant parts thereof (where the associated rules apply), but do not show the intended outcomes (areas where each pest is to be contained to).</p> <p>Decision Sought:</p> <p>Include a clearly defined objective for each pest (or group of pests) specified in this programme, which identifies the area that the pest (or group of pests) is to be contained within</p>	<ul style="list-style-type: none"> • Queensland poplar • yellow flag • yellow Jasmine. <p>And the following plants to parts of the region, where there is no intention to ensure occupier control outside the mapped areas, as they are too widespread:</p> <ul style="list-style-type: none"> • banana passion vine • climbing asparagus • old man’s beard • wild ginger. <p>Or they are left where currently proposed and the containment determination applies to the whole district. (Note: knotweeds could/should be moved to eradication, as mentioned through responses to another submission, above).</p> <p>Staff consider that the remaining 7 progressive containment pests (with different rules relating to control in both the whole region and the mapped containment areas) remain in this category but more specific containment areas are able to be mapped:</p> <ul style="list-style-type: none"> • bomarea • Chinese Pennisetum 	<p>Decision reflected in new Tables 6 and 7, for the new sustained control pests (depending on whether there are rules for whole of region or part thereof).</p> <p>For remaining progressive containment pests, see the reworked table 5 (and the accompanying 7 new maps) in Appendix 1.</p> <p>CBA documents were also updated accordingly.</p>
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<p>or reduced to over the term of the RPMP.</p>	<ul style="list-style-type: none"> • nassella tussock • purple loosestrife • reed sweet grass • variegated thistle • white-edged nightshade. <p>Essentially current Tables 6 and 7 would be merged into one table of 'Progressive Containment Pests in Parts of the Tasman-Nelson Region'. Staff are also of the opinion that if the plants met CBA/NPD tests (as progressive containment) they will also meet sustained control outcomes.</p>	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>Staff submit that there should be a clearly defined objective for</p>	<p>Agree as per above.</p> <p>Revised quantitative CBAs (which include occupier costs) have been performed for each of the species above. The CBA output is summarised below:</p> <p>Re-assignment to the sustained control category:</p>	<p>Committee agreed with staff recommendation to reassign: banana passion vine, chocolate vine, climbing asparagus, <i>Gunnera</i>, old man's beard, Queensland poplar, wild ginger, yellow flag and yellow jasmine to the sustained control programme and for the remaining seven</p>

<p>each pest (or group of pests) included in this programme, which identifies the area that the pest (or group of pests) is to be contained within or reduced to over the term of the RPMP. The process of defining these objectives – together with any associated cost-benefit analysis – may lead to a re-evaluation of the most appropriate management programme for each pest; for example, some of the pests included in this programme may be more appropriately managed through the sustained control or site-led programmes (discussed below).</p> <p>Decision Sought:</p> <p>Once objectives have been defined assess need to undertake a further cost-benefit analysis to confirm the most appropriate management programme.</p>	<ul style="list-style-type: none"> • chocolate vine (more cost beneficial than proposed) • <i>Gunnera</i> (more cost beneficial than proposed) • Queensland poplar (not cost beneficial*) • yellow flag (more cost beneficial than proposed**) • yellow Jasmine (more cost beneficial than proposed) <p>Also:</p> <ul style="list-style-type: none"> • banana passion vine • climbing asparagus • old man’s beard • wild ginger. <p>*Queensland poplar remains cost beneficial as a regional progressive containment species after revising the original assumptions on the size of the infestation.</p> <p>** Yellow flag is more highly cost beneficial as a regional progressive containment species after revising the original assumptions on the size of the infestation.</p>	<p>pests to have clearly mapped containment areas.</p> <p>Decision reflected in new Tables 6 and 7, for the new sustained control pests (depending on whether there are rules for whole of region or part thereof).</p> <p>For remaining progressive containment pests, see the reworked table 5 (and the accompanying 7 new maps) in Appendix 1.</p> <p>CBA documents were also updated accordingly. Decision reflected in new Table 6, for the new sustained control pests.</p> <p>For remaining progressive containment pests, see the reworked table 5 (and the accompanying 6 new maps) in Appendix 1.</p> <p>CBA documents were also updated accordingly.</p>
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	All of the newly mapped progressive containment species (Bomarea, Chinese Pennisetum, nassella tussock, purple loosestrife, reed sweet grass, variegated thistle, white-edged nightshade) are cost beneficial.	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>Principal Measure (a) states that occupiers are required to control all Progressive Containment Pests on their land. This is incongruous with the Rule in Section 6.3.1, which requires landowners to destroy any Progressive Containment Pests on their land. The words ‘control’ and ‘destroy’ have specific meanings in the context of the RPMP, and staff submit that ‘destroy’ is the more appropriate term in this instance.</p>	The Principal measure is to achieve overall control, however if the rule is triggered it is expressed in a more directive and time bound manner and requires the species present to be destroyed.	Agree leave as ‘control’ for this context.

<p>Decision Sought:</p> <p>Amend Principal Measure (a) by replacing 'control' with 'destroy'.</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>X18113 Project De Vine Trust</p> <p>Oppose</p> <p>Matter:</p> <p>Yellow Jasmine is identified as a 'progressive containment' pest for the entire Tasman-Nelson region. It is questionable whether this species should be included in this programme (or even in the RPMP), given its widespread distribution and difficulty of control. If Yellow jasmine is retained this programme staff submit that a surveillance strategy including control of outliers outside the</p>	<p>Agree (see above).</p> <p>Staff suggest move to sustained control. This move is confirmed as being cost beneficial (quantitative CBA performed).</p>	<p>On the basis of reviewed CBA</p> <p>Move to sustained control across the joint region.</p> <p>Refer to new Table 6.</p>

<p>identified core area of infestation would be a more appropriate way forward.</p> <p>Alternatively, there may be some justification for including Yellow Jasmine in one or more site-led pest programme(s), if it poses a particular threat to the values present at those sites. A more detailed cost-benefit analysis may be required for this species to justify its inclusion and the choice of management programme.</p> <p>Decision Sought:</p> <p>Undertake more detailed cost-benefit analysis for Yellow Jasmine, including consideration of other management programmes (eg Sustained Control, Site-led).</p>		
<p>Submitters:</p>	<p>Have reviewed and accept this is in the wrong programme. Recommend moving plant to sustained control. This move is confirmed as being cost beneficial (quantitative CBA performed).</p>	<p>Banana Passion Vine - Remove Upper Buller from the map and move Golden</p>

<p>16796 Northern South Island Department of Conservation</p> <p>X18113 Project De Vine Trust</p> <p>Oppose</p> <p>Matter:</p> <p>The present control program for Banana Passion Vine (in Golden Bay) is thought to be working well, but it would be appropriate to have this reviewed prior to continuation to determine whether it is achieving (or capable of achieving) its goal. If the goal is not being achieved there should be a further assessment of what resources or change in strategy are required to achieve the goal, prior to continuing.</p> <p>Decision Sought:</p> <p>Review effectiveness of control program for Banana Passion Vine to determine whether it is</p>		<p>Bay control areas to sustained control including in Riwaka – but with slightly different rules reflected by infestation densities between Golden Bay and Riwaka areas.</p> <p>Change reflected in new Table 5 and new Table 7 plus new but separate maps 3.1 and 3.2 for the two areas (which are adjoining).</p>
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<p>achieving its goal. If the goal is not being achieved there should be a further assessment of what resources or change in strategy are required to achieve the goal.</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>X18113 Project De Vine Trust</p> <p>Oppose</p> <p>Matter:</p> <p>Similarly, the programme and objectives for Climbing Asparagus (Eastern Golden Bay) should be reviewed to determine whether they are achievable and appropriate. Costs associated with containment may be excessive given the area this plant has already spread to, and the difficulty in both finding and</p>	<p>Recommend change to sustained control. This move is confirmed as being cost beneficial (quantitative CBA performed).</p> <p>Landowner and Council control is occurring in Wainui Bay so Map to be amended.</p>	<p>Climbing asparagus has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 6. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives emphasis.</p> <p>Tables 5 and 7 updated accordingly, including new map 6.</p> <p>New appendix 2 addresses community emphasis and expansion possibilities.</p>

<p>controlling it. Alternative options are to manage this pest to keep it out from defensible areas rather than seeking to control it over large landscapes; and/or to try a small control area, taking the plant from knock down to a level of control that is sustainable long term.</p> <p>Decision Sought:</p> <p>Review objectives and management programme for Climbing Asparagus (Eastern Golden Bay) to determine whether they are achievable and appropriate; and, if not, investigate more appropriate options.</p>		
<p>Submitters:</p> <p>17580 Project Janszoon X18113 Project De Vine Trust Support</p> <p>Matter:</p>	<p>As above.</p>	<p>Climbing asparagus has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 6. No occupier rules are envisaged outside the</p>

<p>Progressive containment over part of the Tasman region for Climbing Asparagus is supported, although staff submit that the area in Map 4 should be extended further east to Wainui Inlet, in which there is only low incidence of Climbing Asparagus based on surveys undertaken by Project De Vine for Project Janszoon. None has yet been recorded in Abel Tasman National Park.</p> <p>Decision Sought:</p> <p>Amend the Progressive containment area for Climbing Asparagus (Map 4) to extend further east to Wainui Inlet.</p>		<p>mapped area. New Appendix 2 address community initiatives emphasis.</p> <p>Tables 5 and 7 updated accordingly, including new map 6.</p> <p>New appendix 2 addresses community emphasis and expansion possibilities.</p>
<p>Submitter:</p> <p>17583 Project De-Vine Trust</p> <p>Matter:</p> <p>Extend Climbing Asparagus progressive control area to include all of Golden Bay.</p>	<p>As above.</p>	<p>Climbing asparagus has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 6. No occupier rules are envisaged outside the</p>

		<p>mapped area. New Appendix 2 address community initiatives emphasis.</p> <p>Tables 5 and 7 updated accordingly, including new map 6.</p> <p>New appendix 2 addresses community emphasis and expansion possibilities.</p>
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>X18113 Project De Vine Trust Support</p> <p>Matter:</p> <p>Woolly Nightshade (Golden Bay) does not have any associated Rule in the Proposed RPMP, and this should be rectified.</p> <p>Decision Sought:</p> <p>Add Rule for Woolly Nightshade.</p>	<p>Staff agree the rule has been missed and we need to insert a rule for the plan provision to have effect. Suggest we use a rule copied from other similar ones but note it will be a sustained control programme.</p>	<p>Drafting omission. Move to sustained control programme. Include a specific rule in line with 6.4.3 and Map 2.3 (including Awaroa) for Woolly Nightshade in line with other sustained control rules.</p> <p>Included in section 6.4 and new rule 6.4.9 – ref to Map 2.3.</p> <p>See also Table 7 for the listing.</p>

<p>Submitter</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>X18113 Project De Vine Trust</p> <p>Oppose both</p> <p>Matter:</p> <p>Woolly Nightshade is identified as a ‘progressive containment’ pest for the entire Tasman-Nelson region. Given its widespread distribution, and the considerable obligation this would impose on landowners, staff submit that the strategic objective for Woolly Nightshade be re-considered. A preferable approach would be including Woolly Nightshade in one or more site-led pest programme(s), where it poses a particular threat to the values present at those sites. A more detailed cost-benefit analysis</p>	<p>Agree however the intention was to only declare Woolly Nightshade in Golden Bay.</p> <p>Proposed to move to sustained control. This move is confirmed as being cost beneficial (quantitative CBA performed).</p>	<p>Drafting omission. Move to sustained control programme. Include a specific rule in line with 6.4.3 and Map 2.3 (including Awaroa) for Woolly Nightshade in line with other sustained control rules.</p> <p>Included in section 6.4 and new rule 6.4.9 – ref to Map 2.3.</p> <p>See also Table 7 for the listing.</p>
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<p>may be required for this species to justify its inclusion and the choice of management programme.</p> <p>Decision Sought:</p> <p>Undertake more detailed cost-benefit analysis for Woolly Nightshade and including consideration for shifting it to other management programmes (eg Site-led).</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>The heading to Section 6.3.6 refers to ‘the area from Golden Bay to Kaiteriteri’; whilst the rule itself and the corresponding references in Tables 2 and 7 describe the area as ‘Golden Bay to Riwaka’; this inconsistency should be rectified.</p>	<p>Re: Old man’s beard, staff agree and recommend the RPMP Proposal is amended as sought by the submitter. Note map does not need changing in area as this is correct and consistent with intent.</p>	<p>Agree change Kaiteriteri to Riwaka and remove Upper Buller from rule.</p> <p>Following deliberations, Old man’s beard has been moved to the sustained control programme and the move is now reflected in Table 7, which has been updated, including a new map 8 and new rule 6.4.7. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives</p>

<p>Decision Sought:</p> <p>Amend heading for Section 6.3.6 by replacing ‘Kaiteriteri’ with ‘Riwaka’.</p>		<p>emphasis and expansion opportunities.</p>
<p>Submitters:</p> <p>17580 Project Janszoon X18113 Project De Vine Trust</p> <p>Oppose</p> <p>Matter:</p> <p>Gunnera is identified as a ‘progressive containment’ pest for the entire Tasman-Nelson region. Given its widespread distribution, and the considerable obligation this would impose on landowners, staff submit that the strategic objective for Gunnera be re-considered. A preferable approach would be including Gunnera in one or more site-led pest programme(s), where it poses a particular threat to the values present at those sites. In</p>	<p>Agree. Recommend shift to sustained control. This move is confirmed as being cost beneficial (quantitative CBA performed).</p>	<p>Committee agreed with staff recommendation to reassign: banana passion vine, chocolate vine, climbing asparagus, <i>Gunnera</i>, old man’s beard, Queensland poplar, wild ginger, yellow flag and yellow jasmine to the sustained control programme and for the remaining seven pests to have clearly mapped containment areas.</p> <p>Decision reflected in new Tables 6 and 7, for the new sustained control pests (depending on whether there are rules for whole of region or part thereof).</p> <p>For remaining progressive containment pests, see the reworked table 5 (and the</p>

<p>this regard, there are no records on Gunnera in Abel Tasman National park and a site-led programme on areas surrounding the Park may be justified. A more detailed cost-benefit analysis may be required for this species to justify its inclusion and the choice of management programme.</p> <p>Decision Sought:</p> <p>Undertake more detailed cost-benefit analysis for Gunnera, including consideration for shifting it to other management programmes (eg Site-led).</p>		<p>accompanying 7 new maps) in Appendix 1.</p> <p>CBA documents were also updated accordingly. Decision reflected in new Table 6, for the new sustained control pests.</p> <p>For remaining progressive containment pests, see the reworked table 5 (and the accompanying 6 new maps) in Appendix 1.</p> <p>CBA documents were also updated accordingly.</p>
<p>Submitter:</p> <p>17584 Royal Forest & Bird Protection Society of New Zealand</p> <p>Matter:</p> <p><i>Section 6.3 Progressive Containment Pests</i></p>	<p>Boneseed: A quantitative CBA to explore the viability of a dedicated progressive containment programme for the Port Hills concludes this type of programme is not cost beneficial.</p>	<p>As it is not cost beneficial to have a site led programme, leave Port Hills boneseed in Appendix 5. (Refer new Appendix 2)</p> <p>Move Yellow Jasmin from progressive containment to</p>

<p>Forest & Bird supports the current list of pests identified for progressive containment. However, we also wish to add others to the list. We believe that it should be possible to control Boneseed in the Port Hills, and should be undertaken, as although it has not yet spread rapidly, it may well still do so. We have seen this kind of exponential curve too many times before!</p> <p>We also support the addition of a number of species to the progressive containment list.</p> <ol style="list-style-type: none"> 1. Retain the current list of pests in the progressive containment lists. 2. Add the following to the progressive containment: <ol style="list-style-type: none"> a. Yellow Jasmine in Golden Bay b. Australian Magpie c. Cretan Brake d. Veldt Grass. 	<p>Yellow Jasmine: The revised quantitative CBA concludes that it is more cost beneficial having this species in sustained control than in progressive containment as proposed.</p> <p>Magpie: Considered to be widespread in the Tasman–Nelson area. Cannot include in RPMP without good information on the location of core infestations in relation to high value native ecosystems, and information on effectiveness of control. A moderate level (quantitative CBA) is required. A non-regulatory biodiversity strategy / site-led approach may be better.</p> <p>Cretan brake and Veldt grass; Cannot include in RPMP without good information on the location of core infestations in relation to high value native ecosystems, and information on effectiveness of control. A moderate level (quantitative CBA) is required. As garden escapees, these plants might be best dealt with via NPPA and Weedbusters.</p>	<p>sustained control for the entire region.</p> <p>Refer new table 6</p> <p>Magpie added to eradication prog. Table 4.</p> <p>Cretan Brake and Veldt grass to be included in Appendix 5 (now new Appendix 2).</p>
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6.3.4 Sustained Control Pests

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 16769 Marlborough District Council</p> <p>Matter: Extend the Howard St Arnaud Gorse–Broom control area to the MDC/TDC boundary and introduce a boundary control rule related to the nearest fenceline to the regional boundary (stop spill over).</p> <p>Decision Sought:</p>	<p>Staff have undertaken a field survey in the area. The staff recommendation is little or no change to the current provisions in the RPMP Proposal.</p> <p>Previously the Tasman control area extended to the Marlborough boundary, but the boundary was pulled back as it proved very difficult to maintain the area free of Gorse and Broom. The RPMP Proposal currently contains a 10 meter boundary clearance rules (6.4.16 and 6.4.17) for Broom and Gorse in this area. Perhaps a clarification could be added to say the rule also applies within the Tasman area where immediately adjoining land on the Marlborough side of the boundary is being kept clear of Gorse and Broom.</p>	<p>Retain the existing Howard St Arnaud gorse and broom control area.</p> <p>Recommend a 10 metre boundary clearance rule for broom and gorse along the Tasman Marlborough boundary line where Marlborough is also keeping the area clear of gorse and broom.</p> <p>Explained in new rules 6.4.18 and 6.4.19.</p>
<p>Submitters: 16798 Federated Farmers of New Zealand</p> <p>Matter:</p>	<p>Noted.</p> <p>Staff agree and recommend also to add into section 6.1</p>	<p>Ensure Section 6.1 includes objectives which adequately reflects rule 6.4.6</p> <p>Refer now new rule 6.4.8.</p>

<p>Support Rule 6.4 6 requiring machinery to be cleaned after mowing in Yellow Bristle Grass areas.</p> <p>Decision Sought:</p>		
<p>Submitters:</p> <p>16802 Waimea Nurseries Limited X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>Matter:</p> <p>Rule 6.4.11 for Fireblight does not include commercial nurseries growing pipfruit seedlings for pipfruit orchards. Fireblight has a greater impact on seedlings than on mature trees.</p> <p>Decision Sought:</p> <p>Include commercial nurseries growing pipfruit seedlings in this rule.</p>	<p>Staff agree.</p> <p>Recommend modify rule to include commercial nurseries growing pipfruit cultivars.</p>	<p>Accept staff recommendation to include commercial nurseries in rule 6.4.11</p> <p>Refer now to new rule 6.4.13.</p>

<p>Submitter: 16993 Nelson City Council</p> <p>Matter: Move Sabella to an eradication programme.</p>	<p><i>See below response regarding eradication and other considerations.</i></p>	<p>Move Sabella to an eradication programme with an emphasis on ongoing elimination and request MPI to continue to support this initiative.</p> <p>Reflected in new table 3 and specific new rule 6.2.6.</p>
<p>Submitter: 17585 MPI</p> <p>Matter: Move Sabella Spallanzanii to S6.2 eradication pests. Also include the common name Mediterranean Fanworm Also include reference to Nelson City Council as a responsible part as they have a local elimination programme.</p>	<p>Inclusion of Sabella (Mediterranean Fanworm) as a sustained control pest in the Proposed RPMP alleviates the need to rely on current Section 100 Biosecurity Act provisions (regarding small scale management programmes - SSMPs). However, the current category listing is at odds with Marlborough District’s approach (exclusion pest, as MDC do not believe Sabella is ‘established’) and Nelson City Council has a local elimination programme operating within their area of jurisdiction. All three parties believe it is a pest but approach management in slightly different ways, and as MPI rightly point out Sabella is a notifiable organism (NO).</p> <p>Being a NO, mandatory reporting is required to MPI on any new Sabella finds, which makes the case stronger for marine</p>	<p>Move Sabella to an eradication programme with an emphasis on ongoing elimination and request MPI to continue to support this initiative.</p> <p>Reflected in new table 3 and specific new rule 6.2.6.</p>

<p>In table 9 under Sabella add that it has unwanted organism status.</p> <p>Rule 6.4.5. As Sabella is also a notifiable organism which requires national reporting to MPI there should be stated time requirements for reporting a find.</p> <p>The rule also needs to refer to equipment as well as the vessel. Also the rule should include the vessels operators not just the owners.</p> <p>Add an additional rule requiring that removal of Sabella from a vessel or structure be undertaken in a bio secure manner with in water physical removal being a last resort.</p> <p>Add an additional rule controlling Sabella on moveable structures such as oil rigs and floating platforms</p> <p>Decision Sought:</p>	<p>incursions to be better led nationally by MPI (some regional councils do not operate in the marine space for this reason). TDC/NCC take a pragmatic approach to marine issues like Sabella. The staff view is that eradication is almost impossible in the marine environment with current detection and control methods and with ongoing re-infestation from fouled vessels coming from northern New Zealand waters.</p> <ul style="list-style-type: none"> • The Councils do recognise the importance of marine biosecurity. However, that does not mean that the Councils should adopt marine biosecurity management programmes without regard for the practical challenges to working in that environment, or the very considerable expense that goes with it. A more collaborative effort is probably needed among Top of the South (TOS) councils, MPI, DOC and industry to develop a more effective marine biosecurity system than at present. <p>The Councils will participate in the discussions necessary to make better biosecurity progress in that direction, but are not well placed to support large-scale marine biosecurity responses. A marine pathway management plan, especially, needs a collaborative approach among multiple partners. Other management options to consider include:</p>	
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	<ul style="list-style-type: none"> • <u>Do nothing</u> and drop it from the RPMP, leaving responses solely to MPI and neighbouring councils – this would be at odds with the TOS partnership. • Rely on <u>SSMP approach</u> to undertake control outside of an RPMP but using Biosecurity Act powers – the status quo. • <u>Move to eradication</u> and increase resources and efforts to eradicate where ever it is found – as outlined above this would likely be expensive and with no guarantee of success. • <u>Move to progressive containment</u> – essentially the same as sustained control, as occupier control rules would prevail. <ul style="list-style-type: none"> • If the current situation were to be adopted there are several points in the MPI submission which would be supported, in terms of clarifying the current rules, namely: <ul style="list-style-type: none"> • Include its common name - Mediterranean Fanworm. • Reference Nelson City Council as a responsible party regarding its programme • Note in table 9 its unwanted organism status. • Add to rule 6.4.5. that Sabella is also a notifiable organism, requiring national reporting to MPI there 	
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	<p>(also should be stated time requirements for reporting a find).</p> <ul style="list-style-type: none">• The rule should include vessels operators/occupiers not just the owners.• Add a rule requiring removal of Sabella from a vessel or structure be undertaken in a bio-secure manner (and in-water physical removal being a final option).• Add to structures that controlling Sabella be carried out on both fixed (e.g. jetties, wharves) and moveable structures (e.g. oil rigs and floating platforms).	
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6.3.5 Site-Led Pests

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 14825 Ms Alison Pickford X18113 Project De Vine Trust Support</p> <p>Matter: Include a site lead programme for Richmond Hills including invasive urban escapee plants mothering vines and vertebrate pests.</p> <p>Decision Sought:</p>	<p>This is a complex area with the presence of many garden escapee pests.</p> <p>Staff consider this is better dealt with through a Bio strategy including support of community initiatives and service delivery (forestry and reserves).</p> <p>Staff recommend no change but monitor situation and review by way of plan change if rules are required.</p>	<p>Include any other invasive urban plants in Appendix 5 (now Appendix 2).</p>
<p>Submitters 14832 Mrs Pauline Schurmann 16765 Ms Anna Hickman X18116 Lynn Duckett and Antony Wright.</p>	<p>Climbing asparagus is too widespread in the surrounding area.</p> <p>Staff consider this is better dealt with through bio strategy including support of community lead initiatives.</p>	<p>Encourage a community led initiative for Totara Avenue and other areas nearby.</p> <p>To be assessed through possible Bio Strategy. Climbing asparagus has been moved to the sustained</p>

<p>Support</p> <p>X18118 Helen and Malcolm Salmond</p> <p>Support</p> <p>X18120 Julie and Dan Anderson</p> <p>Support</p> <p>Matter:</p> <p>Include a site lead programme for Climbing Asparagus in the Totara Ave area Collingwood</p> <p>Decision Sought:</p>		<p>control programme and the move is now reflected in Table 7, which has been updated, including a new map 6. No occupier rules are envisaged outside the mapped area. New Appendix 2 address community initiatives emphasis.</p>
<p>Submitters</p> <p>14859 Forest and Bird Protection Society of New Zealand</p> <p>Matter:</p> <ul style="list-style-type: none"> • Include rats and mice for Waimea Inlet site lead 	<p>Staff agree and recommend the Waimea site lead programme should include all rat species.</p> <p>However regarding mice this is unachievable except in areas with physical boundaries such as islands or having pest proof fences. Recommend do not include mice</p>	<p>Include rat species in the Waimea site led programme.</p> <p>Mice - this is unachievable except in areas with physical boundaries such as islands or having pest proof fences.</p> <p>Added to new Table 11 (and Table 1).</p>

<p>Submitters</p> <p>16793 Mr Phillip Borlase</p> <p>19146 Mr Ian Thorneycroft</p> <p>Matter</p> <p>Remove Nocatchem farm (Borlase) from St Arnaud site lead programme</p>	<p>There was inadequate discussion with adjoining large landowners when this site lead programme was developed.</p> <p>Therefore staff recommend that those large adjoining farms should be excluded. This will also include the Borlase and Thorneycroft properties.</p>	<p>The Committee apologizes for the inadequate pre-consultation with specific landowners. Adjust Map 14 Remove Borlase and Thorneycroft properties. Encourage both land owners to continue with their own control programmes.</p> <p>Revised map 19 shows the changes referred to.</p>
<p>Submitters</p> <p>16794 Golden Bay Branch of Forest and Bird</p> <p>Matter:</p> <p>If CBA is used to justify site lead programmes such as Waimea Inlet why are other sites where groups are active not included. ?</p>	<p>The site lead programmes included in the Plan Proposal are the result of approaches from community groups seeking inclusion of their areas in site lead programme or provided justification of the values to be protected and the risk to those values.</p> <p>Staff recommend that other SLP which are proposed by community groups are considered on their merits at a later stage through plan change/s.</p>	<p>We encourage community groups to seek inclusion of site led programmes into the future which can be considered through plan changes.</p>
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p>	<p>Concerns about limiting site-led programmes (SLP) to biodiversity issues is noted. However, there has been no need to extend the concept to address other site-led values. First paragraph in Section 6.5 identifies that in <i>this</i> Plan, site-led programmes pertain only to areas of high natural value. No change.</p>	<p>Accept officer's advice no change needed.</p>

<p>Matter:</p> <p>As previously noted, the choice of management programme – and the specific objective – should be informed by the values to be protected or at risk, the pests that impact on the values, the area affected (or potentially affected), the level to which the pest must be controlled to manage impacts to an acceptable level, and an analysis of the benefits and costs that satisfies the requirements of the NPD.</p> <p>Site-led pest programmes are not restricted to pests that cause adverse impacts in sites with high natural values (as suggested in the first paragraph in section 6.5) but can be used to protect sites with any of the values listed in s54(a) of the Act.</p> <p>Community interest or support is not in itself justification for a site-led programme, but may affect the cost-benefit analysis.</p>	<p>Amend Principal Measure (a) to more accurately reflect occupiers’ obligations under the Rules that follow; Agree. This section can be revised to indicate the scope of the occupier obligation is captured in any specific rules for each pest.</p> <p>Clear identification of the values to be protected at each site, and the impact of each pest on those values. Agree in part. The natural values to be protected at each site are contained in the site description, but it is not absolutely clear what is being protected. However, it is not necessary to attribute an impact to each pest individually.</p> <p>Identification of the specific objective(s) to be achieved for each pest at each site (e.g. whether eradication or sustained control); Agree in part. While it is incorrect to suggest that the NPD requires that the plan have specific objectives for each pest at each site, it would aid clarity if a site-led objective was posed for each site (as opposed to the sites as a group as they appear in the plan) with a brief indication of the pest outcomes achieved by the rules.</p> <p>Identification of the specific areas to be included in the Site-led programmes for wilding conifers (these to be further defined in consultation with DOC and other affected parties). Disagree.</p>	
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<p>There should be a specific objective for each pest at each site, which reflects the considerations above. A generic objective to ‘eradicate or progressively control’ the pests at a site does not provide sufficient certainty on what is intended or required, and the actions (and costs) to eradicate a pest may be very different to those required to control it.</p> <p>The Guidance Document on Meeting the Requirements of the NPD for Pest Management provides information on setting objectives for site-led programmes (including examples).</p> <p>With these observations in mind, staff support in principle the site-led programmes that have been included in the Proposed RPMP, but believe that there are deficiencies in the programmes as proposed that need to be rectified. Staff also believe this programme has been under-utilized in the Proposed RPMP and that there are other sites/pests</p>	<p>This is a work in progress. As noted above, staff recommend that at this stage it is better to deal with the wilding conifer provisions by plan change rather than wait until after the consultation process has concluded.</p> <p>Clarification of when an ‘authorised officer’ may make a request (or direction) to control a pest identified in a site-led programme. Accept in principle. For site led programmes, reference to ‘authorised officer’ appears in the Taiwan cherry rule. The rule wording provided by NCC contains more specific direction. If the Nelson City Council submission on Taiwan Cherry is adopted, this concern is addressed.</p> <p>Clarification of whether volunteers (or volunteer groups) are (or can be appointed as) an ‘authorised officer’. Accept. As noted above, Section 1.3 may be revised to indicate that other agencies employees could be authorised under the Biosecurity Act by Tasman District Council or Nelson City Council.</p> <p>The Waimea Inlet Site lead Programme - Is based both on the very high ecological values of the Waimea Inlet and the support of the local community to protect these values. The Plan Proposal boundary for the Waimea Inlet site lead programme is consistently protective of the high ecological values but is limited to where the community is taking positive action. Staff</p>	
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<p>which could or should be subject to a Site-led Pests Programme. Further comments are given below.</p> <p><i>Principal Measures</i></p> <p>The wording of Principal Measure (a) does not capture the range of occupiers’ obligations under the Rules set out in sections 6.5.1 – 6.5.4.</p> <p>Decision Sought:</p> <p>Amend the Site-led Pests Programmes to address the matters identified in these submissions, including:</p> <ul style="list-style-type: none"> • Amend Principal Measure (a) to more accurately reflect • Occupiers’ obligations under the Rules that follow • Clear identification of the values to be protected at each site, and the impact of each pest on those values 	<p>recommend that the boundaries remain as they are, but additional information be added to table 13 specifying what the values are.</p> <p>Evaluation of other potential site-led pest programmes that would support strategic programmes for the restoration, protection and enhancement of indigenous biodiversity; and identification of preferred course of action for bringing such programmes into the RPMP. This should be done in consultation with DOC and other affected/interested parties.</p> <p>Accept in principal but no changes to be made. This request is unlimited in scope and any further consultation risks delay in releasing the plan. The Act provides for review of a plan at any stage, providing plenty of opportunity to introduce new site-led plans as and when they are developed. A Bio Strategy is a better place to define an ongoing process of scoping additional sites and their consultation.</p>	
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<ul style="list-style-type: none"> • Identification of the specific objective(s) to be achieved for each pest at each site (e.g. whether eradication or sustained control) • Identification of the specific areas to be included in the Site-led programmes for wilding conifers (these to be further defined in consultation with DOC and other affected parties) • Clarification of when an 'authorised officer' may make a request (or direction) to control a pest identified in a site-led programme • Clarification of whether volunteers (or volunteer groups) are (or can be appointed as) an 'authorised officer' • Re-assessment of the site-led programme on the south side of the Waimea Inlet, to ensure the boundaries of the site(s) are appropriate in the context of the values to be protected and the 		
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<p>management objectives for the pests that impact on those values</p> <ul style="list-style-type: none"> • Evaluation of other potential site-led pest programmes that would support strategic programmes for the restoration, protection and enhancement of indigenous biodiversity; and identification of preferred course of action for bringing such programmes into the RPMP. This should be done in consultation with DOC and other affected/interested parties. 		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p><i>Taiwan Cherry (Nelson City, north-eastern area)</i></p> <p>This would benefit from a clearer description of the values to be protected and of the relative costs</p>	<p>Staff generally agree with the Nelson City Council submission and analysis.</p> <p>Councilors will need to consider the cost implications of the various options outlined in the Nelson City Council submission.</p> <p>Based on the total costs and benefits the most efficient option would be to amend the RPMP Proposal to make Taiwan Cherry an eradication pest in both council areas.</p>	<p>Move Taiwan Cherry from a site led programme to a planned regional eradication approach and that Nelson City Council and Tasman District Council look to find additional budget.</p> <p>That a request is made to MPI that it be included in the National Pest Plant Accord and inform them of Nelson City Council and Tasman District Council's programme.</p>

<p>and benefits of different management programmes (eradication vs progressive containment vs sustained control vs site led).</p> <p>The Rule associated with the site-led programme for Taiwan Cherry (6.5.2) requires occupiers to destroy this pest '<i>at the request of an authorised officer</i>'. This wording differs from other similar Rules (which use the word 'direction' rather than 'request'); and it would be helpful to include information on the matters that an authorised officer will consider before making such a request (or direction).</p>	<p>The cost implication for Nelson City Council is around \$500,000 and Tasman District Council about \$50,000.</p> <p>Note: TDC could find its share out of the land management allocations if the councilors want to support this change</p>	<p>Reflected in Tables 1 and 3 as an eradication species. Covered in revised rule 6.2.1.</p>
<p>Submitter:</p> <p>16993 Nelson City Council</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>Matter:</p>	<p>See above.</p> <p>Full CBA provided by submitter. Request can be justified as IRR is 50%- >100% but it will be a matter of the cost to each council.</p> <p>For Nelson City Council costs would be around \$485,000 over 30 years and for occupiers \$75,000</p>	<p>Move Taiwan Cherry from a site led programme to a planned regional eradication approach and that Nelson City Council and Tasman District Council look to find additional budget.</p> <p>That a request is made to MPI that it be included in the National Pest Plant Accord and inform them of</p>

<p>Move Taiwan Cherry from a site lead programme to a pan regional eradication approach.</p>	<p>For Tasman District Council the total cost (Council and occupiers) is calculated as between \$37,000 and \$75,000 over 15 years.</p>	<p>Nelson City Council and Tasman District Council’s programme.</p> <p>Reflected in Tables 1 and 3 as an eradication species. Covered in revised rule 6.2.1.</p>
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matters:</p> <p><i>Site-led programme on the south side of the Waimea Inlet (feral cats, brushtail possum, mustelids)</i></p> <p>This would also benefit from a clearer description of the values to be protected, the impact that each specified pest has on these values, the level to which each pest must be controlled to manage impacts to an acceptable level, and the area over which control must be implemented to achieve this.</p>	<p>The level of detail that the submitter requests (clearer description, the pests controlled) will be contained in the RPMP Operational Plan (as required under Section 100B of the BSA) and accordingly is not appropriate for an overarching RPMP policy document. Progress against the factors noted and on attaining the desirable results/outcomes in the Operational Plan will be reported as part of the annual biosecurity report.</p> <p>Regarding the authorisation matters, authorised persons (APs) have to be appointed by the CEO of TDC and/or NCC under section 103(3) of the Biosecurity Act. Criteria need to be met before these appointments are made. APs generally are biosecurity staff/contractors, but can also be other management agency named staff (e.g. DOC staff with key responsibilities). It is not out of the question that volunteers could become APs, but this move would generally be unnecessary, due to the nature of site-led control being done through voluntary programmes. On the very odd occasion Biosecurity Act powers may be needed but these could be used by existing staff, who have been thoroughly trained in the legal requirements. Voluntary workers could be made ‘accredited</p>	<p>Councilors support the staff recommendation that details will be retained in the Operational Plan and clarification of authorized persons within the Plan.</p> <p>Reflected in section 6.5 Principal measure (c) - which has been updated.</p>

<p>As currently defined, the boundaries of the site (shown on Map 15) are not clearly or easily related to the values to be protected; and objectives are unlikely to be achieved because the areas subject to control are generally small relative to the potential sources of incursion/re-invasion from neighbouring land.</p> <p>The associated rule (6.5.4) requires occupiers to allow access to an 'authorised person' to control the pests. Much of the current pest control effort in this area is done by volunteers, and it is unclear whether such volunteers are (or could be appointed as) an 'authorised person' for the purposes of this Rule.</p> <p>The Explanation of the Rule states that its purpose "<i>is to reduce the density of these pests to zero in the sites that have been identified.</i>" It is unclear whether zero density of all</p>	<p>persons' under the Biosecurity Act, for essential identification purposes, but would not have full Biosecurity Act powers.</p>	
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<p>specified pests is actually required to provide an adequate level of protection for the values present; and, as noted above, zero density is unlikely to be achievable as the areas subject to control are generally small relative to the potential sources of incursion/re-invasion from neighbouring land.</p> <p>Decision Sought:</p>		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>Matters:</p> <p><i>Additional site-led programmes</i></p> <p>Site-led programmes may also be appropriate for areas that are included in strategic programmes for the restoration, protection and enhancement of indigenous</p>	<p>Staff consider this would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a plan change.</p> <p>(see below for Abel Tasman National Park).</p>	<p>Agree with staff recommendation.</p> <p>(Refer to Project Janszoon submission point below regarding Abel Tasman National Park).</p>

<p>biodiversity, such as Abel Tasman National Park and sites managed under the Nelson Nature programme.</p> <p>In some cases, it may also be appropriate for the site-led programme to include areas immediately adjacent (or in proximity) to the land where the values are being protected, if the values are being affected by pests that are spreading from the adjoining land. Alternatively, Good Neighbour Rules (GNRs) could be used in conjunction with site-led programmes to require control of specified pests on land adjacent to/nearby areas that are subject to intensive or sustained pest control, and where re-invasion/ spread from the adjacent/nearby land would otherwise cause additional (unreasonable) costs.</p> <p>These concepts were discussed with Council staff during earlier consultation on development of the Proposed RPMP; but were not able</p>		
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<p>to be advanced to a stage where they could be included in the notified version of the Proposed RPMP. There is still additional work to be done in this regard, and the Councils will need to consider whether these matters can be addressed through the current process of submissions and hearings, or would need to be addressed through a subsequent partial review of the RPMP (under s100D of the Biosecurity Act).</p> <p>Decision Sought:</p>		
<p>Submitter:</p> <p>16888 Tasman Environmental Trust</p> <p>Matter:</p> <p>Create site lead programme for stoats, weasels, ferrets, feral cats in Graham, Pearce and Baton Valleys to support Friends of whio.</p> <p>Decision Sought:</p>	<p>Staff consider this would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a plan change.</p> <p>Staff recommend deal with as plan change.</p>	<p>Agree with staff recommendation.</p>

<p>Submitter: 17580 Project Janszoon</p> <p>Matter : Site-led programmes may be appropriate for private land enclaves within Abel Tasman National Park (ATNP), and some land adjoining the Park.</p> <p>Weed species that have clearly spread from private land enclaves into the Park, and which Project Janszoon and Abel Tasman Birdsong Trust has undertaken considerable control of include:</p> <ul style="list-style-type: none"> • <i>Grevillea rosemarinifolia</i> • <i>Cotoneaster glaucophyllus</i> • <i>Ilex aquifolium</i> • <i>Acacia</i> spp. • <i>Acer pseudoplatanus</i> • <i>Pomaderris kumerahou</i> • <i>Pseudotsuga menziesii</i>. 	<p>These concepts were discussed with staff during consultation on development of the Proposed Plan, but were not able to be advanced to a stage where they could be included in the notified version of the Proposed Plan. However, the Joint Committee, during deliberations, considered these matters could be addressed through the process of submissions and hearings.</p> <p>The Joint Committee recommended developing a site led programme for the private land enclaves within Abel Tasman National Park for the pests identified (except <i>Acacia</i> species), subject to a more detailed cost benefit analysis and further targeted consultation of affected landowners within the Abel Tasman National Park environs.</p> <p>The basis of the ATNP site-led proposal was a rule included:</p> <p><i>From 31 December 2019 onwards, then for the duration of this Plan, occupiers of private land within the ATNPSP areas in and around Awaroa, Torrent Bay and Marahau (as identified in maps x, y and z) must:</i></p> <p style="padding-left: 40px;">(a) <i>report any sightings of rosemary grevillea, cotoneaster species, European holly, sycamore, kūmarahou and wilding Douglas fir within the ATNPSP area to Tasman District Council within five days of their sighting (or follow an inspection and reporting timetable as negotiated with an Authorised Person);</i></p>	<p>Following the additional hearing on the matter it was agreed that CBA outcomes were positive and that:</p> <ul style="list-style-type: none"> • the ATNP Site-led Programme Proposal, as notified, be included in the amended Plan; • provisions be included within the Operational Plan that staff minimise the use of herbicides and implement best practice guidelines; • that the Operational Plan gives due consideration to work with property owners to seek cooperation around timing and access; and that • Himalayan lily and hakea be included in Appendix 2. <p>Changes accordingly are reflected in amended / new Tables 10 and 11 and new rule 6.5.1, and Appendix 2.</p>
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<p>This work has largely been supported by the private landowners who have allowed seed sources to be removed. A site-led programme would allow these gains to be formalised and prevent the re-invasion of the Park by these pests.</p> <p>As noted above, some weeds that are included in Progressive Containment may be better treated as site-led programmes in areas adjoining Abel Tasman National Park, including Yellow Jasmine, Woolly Nightshade and Gunnera, where these threaten Abel Tasman National Park. In addition, a site-led programme for Sycamore should also be considered.</p> <p>In some cases, it may also be appropriate for the site-led programme to include areas immediately adjacent (or in proximity) to the land where the values are being protected, if the values are being affected by pests that are spreading from the adjoining land. Alternatively, Good</p>	<p><i>(b) destroy any rosemary grevillea, cotoneaster species, European holly, sycamore, kūmarahou and wilding Douglas fir on their property prior to setting seed.</i></p> <p><i>A breach of this rule is an offence under Section 154N(19) of the Biosecurity Act.</i></p> <p>During development of the ATNP proposal <i>Acacia</i> spp. were removed at the request of the primary submitter. The reason being that they had removed nearly all the seed sources and that the requirement to act really only amounted to seedling control. This was felt to be within landowner scope and that there should be no financial obligation on them. Site-led programmes for sycamore, yellow jasmine, woolly nightshade and gunnera were not supported either primarily due to their inclusion as pests in other programmes under the RPMP.</p> <p>TDC undertook targeted consultation with the landowners directly affected during between 1 October 2018 and 2 November 2018. A separate hearing was held on 3rd December to receive the report and submissions.</p>	
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<p>Neighbour Rules (GNRs) could be used in conjunction with site-led programmes to require control of specified pests on land adjacent/nearby areas that are subject to intensive or sustained pest control, and where re-invasion/spread from the adjacent/nearby land would otherwise cause additional (unreasonable) costs.</p> <p>Decision Sought:</p> <p>Create a site-led programme and/or Good Neighbour Rules for the private land enclaves within Abel Tasman National Park, if justified by more detailed cost-benefit analysis.</p> <p>Create site-led programmes for Sycamore, Yellow Jasmine, Woolly Nightshade and Gunnera in areas adjoining Abel Tasman National Park, if justified by more detailed cost-benefit analysis.</p>		
<p>Submitters:</p>	<p>As above</p>	<p>Support noted with thanks.</p>

<p>19361 – JM and KLA Campbell Family Trust</p> <p>19385 - Mark Family Trust</p> <p>19340 - Boundary Bay Trust LJ Ralph</p> <p>19342 – FT Heller</p> <p>19346 – S Wilkins</p> <p>Matter :</p> <p>Fully support the separate ATNP proposal without any changes or requests.</p>		<p>Outcomes as noted above for primary submitter.</p>
<p>Submitter:</p> <p>19350 - M Hannen and S Bensemann</p> <p>19386 - Turepo Trust – T Le Gros</p> <p>19341 – H and K Johnstone Family Trust</p> <p>Matter :</p> <p>Overall support for the separate ATNP proposal but wanted/requested changes, respectively, as per below.</p> <p>Decision Sought:</p>	<p>As above and support noted.</p> <p>While a site of Himalayan lily is known in Glasgow Bay its mechanism of spread is slow and it has not displayed any greater weedy tendencies than other garden plants present in the area. A personal approach to the landowners concerned may be the most effective response.</p> <p>This proposed inclusion of hakea is not supported by Department of Conservation or Project Janszoon who consider the purpose of the Site Led programme is to protect Abel Tasman National park rather than the private landowners adjoining the park. Further the addition of this species would be</p>	<p>Following the additional hearing on the matter it was agreed that CBA outcomes were positive and that:</p> <ul style="list-style-type: none"> • the ATNP Site-led Programme Proposal, as notified, be included in the amended Plan; • provisions be included within the Operational Plan that staff minimise the use of herbicides and implement best practice guidelines; • that the Operational Plan gives due consideration to work with property owners to seek

<ul style="list-style-type: none"> • Include Himalayan lily – timeframe not specified • Overall support but concern about hakea species spreading into Boundary Bay Reserve from ATNP. • Supports the proposal but wants any species added in future, for occupiers to be consulted before adding. 	<p>both contradictory and difficult to include in the plan process without another round of consultation.</p> <p>Species cannot be randomly added, and consultation is required to occur.</p>	<p>cooperation around timing and access; and that</p> <ul style="list-style-type: none"> • Himalayan lily and hakea be included in Appendix 2. <p>Changes accordingly are reflected in amended / new Tables 10 and 11 and new rule 6.5.1, and Appendix 2.</p>
<p>Submitter:</p> <p>19389 - C Franks</p> <p>19390 - G and E Goodall</p> <p>19405 – SJ and HA Olds</p> <p>Matter and Decision Sought:</p> <p>Oppose the separate ATNP proposal on the following bases, respectively, as per below:</p> <ul style="list-style-type: none"> • namely access onto property and any control without permission. Fears pests will be added without consultation and that 	<p>As above. Other notes include:</p> <p>The BSA contains robust powers of entry for inspection and control but requires APs to demonstrate necessary skills during these actions – respect and negotiation skills. Pests cannot be added without due process. While kūmarahou is a native plant it is not found naturally in the South Island, therefore could be considered as a ‘nuisance plant’, hence a pest.</p> <p>TDC wishes to work closely on any control programmes required with occupiers and only its staff would be authorised to enter property, which would be pre-arranged and follow council best practice procedures, aside to the RPMP. Costs (5k) would be spread across all TDC ratepayers.</p> <p>As above, access/permission process is not a RPMP procedural matter, but covered under best practice procedures (backed by</p>	<p>Following the additional hearing on the matter it was agreed that CBA outcomes were positive and that:</p> <ul style="list-style-type: none"> • the ATNP Site-led Programme Proposal, as notified, be included in the amended Plan; • provisions be included within the Operational Plan that staff minimise the use of herbicides and implement best practice guidelines; • that the Operational Plan gives due consideration to work with property owners to seek cooperation around timing and access; and that • Himalayan lily and hakea be included in Appendix 2.

<p>kūmarahou is a medicinal plant.</p> <ul style="list-style-type: none"> • doesn't believe TDC officials should have access onto private property. Costs of the SLP should be spread across all ratepayers, not just those affected by this proposal. • access and treatment only with permission, only employing experienced professionals to do control (prior issues of alleged over spray). Concerned about gorse. 	<p>BSA powers). Gorse generally is a 'nursery plant for natives establishing' and over time is suppressed by native vegetation. Region wide boundary Good Neighbour Rule for gorse will apply to this area.</p>	<p>Changes accordingly are reflected in amended / new Tables 10 and 11 and new rule 6.5.1, and Appendix 2.</p>
<p>Submitter</p> <p>17584 Royal Forest & Bird Protection Society of New Zealand</p> <p>X18113 Project De Vine Trust Support</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Matter:</p>	<p>Staff consider this would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a plan change.</p> <p>Staff recommend deal with as plan change.</p>	<p>Encourage community groups to submit to Council for site led pest control programmes which might warrant inclusion in a Programme or should remain as part of Bio strategies.</p> <p>Ensure site led pests are included in Appendix 5 and within the Appendix encourage that species listed should not be sold,</p>

<p>Forest and Bird seeks the following:</p> <ol style="list-style-type: none"> 1. Do a fuller assessment of community-led projects that should be included for site-led pest control, so they can also undertake action on adjoining properties and be available for funding streams and other Council support. 2. Include site-led pests on a list of species that should not be sold, propagated, or otherwise exchanged. 		<p>propagated, or otherwise exchanged.</p> <p>Expanded on in new introduction to new Appendix 2.</p>
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6.4 Other Species-Specific Matters – eg Wilding Pines, Cats (Feral/Other)

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16677 Mr Christopher Richards</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>X 18124 Native Bird Recovery Richmond</p> <p>Support</p> <p>16771 Mrs Pamela Pope</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>X18124 Native Bird Recovery Richmond</p> <p>Support</p> <p>Matter:</p> <p>Control of all cats under RPMP.</p>	<p>Staff consider the Plan Proposal could include feral cats, but not domestic ones.</p> <p>However given the range of feral cats and the ongoing issue of cat dumping staff consider it would be unreasonable to enforce a feral cat rule against any particular landowner.</p> <p>Staff recommend management of feral cats is best dealt with through Bio Strategy which would include: loan of traps; and provision of advice as is the current situation.</p> <p>Note: see also Section 8 submissions domestic cats.</p>	<p>The difference between a domestic cat and a feral cat needs to be clearly defined.</p> <p>Request NCC and TDC introduce aligned bylaws similar to Wellington City’s that include mandatory microchipping, a limit on the number of cats and de-sexing (whilst allowing for cats from licensed breeders), ensuring adequate community incentives to support compliance.</p>

<p>Submitters:</p> <p>14859 Forest and Bird Protection Society of New Zealand</p> <p>16677 Mr Christopher Richards</p> <p>16772 Mr Neil Page</p> <p>16888 Tasman Environmental Trust</p> <p>X18124 Native Bird Recovery Richmond</p> <p>Support</p> <p>Matter:</p> <p>Introduce cat control bylaws (LGA) and control numbers, desex, microchip.</p>	<p>Staff consider the management of domestic cats to be outside the provisions of the Biosecurity Act and RPMP.</p> <p>However staff agree better management of domestic cats would help reduce cat predation of native fauna and reduce the amenity impacts of stray cats.</p> <p>An alternative approach to cat management outside the RPMP proposal would be to introduce a bylaw under the Local Government Act similar to that introduced by Wellington City which includes mandatory microchipping of domestic cats and control on cat numbers.</p> <p>If the Councils agree with that approach they could recommend to both Councils that they instruct staff to review the Wellington City Council (WCC) bylaw and to report back on the option of adopting a similar bylaw for the NCC/TDC areas.</p>	<p>The difference between a domestic cat and a feral cat needs to be clearly defined.</p> <p>Request NCC and TDC introduce aligned bylaws similar to Wellington City's that include mandatory microchipping, a limit on the number of cats and de-sexing (whilst allowing for cats from licensed breeders), ensuring adequate community incentives to support compliance.</p>
<p>Submitters:</p> <p>16779 Mr Scott Nicol</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p>	<p>Best dealt with by Plan change.</p> <p>Note: have sought advice from MPI (Tamsin Page) regarding the inclusion of Douglas fir and Radiata pine in a RPMP. While forest companies claim these species cannot be included the advice is provided by MPI is the</p>	<p>Resolved that all other areas, including the Nelson Nature Wilding Conifer Operational Area, be further developed for wilding conifer control programmes, through a Plan</p>

<p>Matter:</p> <p>Include Douglas Fir adjoining Kahurangi National Park as pests in RPMP</p> <p>(See also Site Led)</p>	<p>plan needs to make it clear that the rules only relate to wilding conifers, not plantation forest to make it legal.</p> <p>However staff recommend that at this stage it is better to deal with the Wilding conifer provisions by plan change as the areas the rule would apply to need to be established, landowners consulted, and areas mapped.</p>	<p>Change, in consultation with all affected parties and consequential amendments may then be made.</p> <p>Note: wilding conifer sections and site led sections featuring wildings (except ATNP) have been removed.</p>
<p>Submitters:</p> <p>16793 Mr Phillip Borlase</p> <p>Matter:</p> <p>Central Government needs to pay for Wilding Conifer control made necessary by heritage plantings.</p>	<p>Staff agree however this is a matter for central government to resolve.</p> <p>Staff recommend no change.</p>	<p>That other areas be further developed for wilding conifer control programmes through a Plan change in consultation with all affected parties.</p>
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p><i>Wilding conifers (Mt Richmond Forest Park and other areas)</i></p>	<p>While staff agree in principle including the site lead programme will require extensive consultation with landowners and agencies involved. The Mt Richmond Forest Park (MRFP) Wilding Conifer Control Strategy is currently in early draft form and is unlikely to be complete in time for the RPMP process.</p> <p>Staff recommend best dealt with by Plan change.</p>	<p>That this be further developed through a Wilding Conifer Plan Change for sites in both Tasman District and Nelson City in consultation with all affected parties.</p>

<p>Staff support the inclusion of a site-led programme for wilding conifers in and around Mt Richmond Forest Park; this aligns with work that DOC is already undertaking with relevant stakeholders, including the Councils and forestry companies. Staff also support the example Rule set out in section 6.5.1.</p> <p>Staff note that the Proposed RPMP does not define the specific area that this programme will apply to (in relation to Mt Richmond Forest Park), but presumably it will include land outside the Forest Park as well. The Proposed RPMP also indicates that a site-led programme for wilding conifers will be applied for Abel Tasman National Park and Nelson Lakes National Park, although these sites are not currently described or defined; and again, the sites will presumably include land outside the National Parks.</p> <p>It is unclear whether the sites are to be defined before the Councils make decisions on the Proposed RPMP, or subsequently; but given the potential consequences for the occupiers concerned, the former is preferred. I would therefore request that the Councils work with DOC and other affected parties to further define the areas that are to be included in this</p>		
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<p>programme, before the RPMP is finalised and approved.</p> <p>Some additional information in respect of wilding conifers in and around Mt Richmond Forest Park is appended as Attachment 3.</p>		
<p>Submitter:</p> <p>16993 Nelson City Council</p> <p>Matter:</p> <p>Add Nelson Nature Wilding Conifer operational area as a site lead programme.</p>	<p>As above.</p> <p>While staff agree in principle the area referred to Includes some DOC and forestry land.</p> <p>Draft provisions will need to be worked through with landowners and in conjunction with MRFP wilding conifer programme.</p> <p>Staff recommend this is better dealt with by a Wilding conifer Plan change.</p>	<p>That this be further developed through a Wilding Conifer Plan Change for sites in both Tasman District and Nelson City in consultation with all affected parties.</p>
<p>Submitters:</p> <p>16793 Nelson City Council</p> <p>17579 Tasman Pine Forests Ltd</p> <p>Matter:</p> <p>6.5 Table 12</p> <p>1. The description only describes the Mount Richmond Forest Park, in its entirety. It does not describe the national parks.</p>	<p>As above.</p> <p>This change would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a plan change.</p> <p>Staff recommend better dealt with by a Plan change.</p>	<p>As above</p>

<p>2. There are only some areas of the MRFP, AT and NLNP's that are at risk from wilding pines not the entire areas.</p> <p>3. The table identifies Douglas fir and radiata pine as pests.</p> <p>4. Clause 4(1)(a) and 4(2)(a) of the National Policy Direction for Pest Management require a Pest Management Plan to state the adverse effects of “wildings” on the matters listed in section 54 of the Biosecurity Act.</p> <p>5. Section 69 of the Biosecurity Act 1993 provides that to the extent to which a regulation made under the Act or any other Act is inconsistent with a rule in the Regional Pest Management Plan, the regulation prevails. The Wilding Conifer Strategy and the National Environment Standard for Plantation Forest would therefore take precedence over the site-lead programme for wilding Douglas fir, Lodgepole Pine (contorta), Radiata pine and Scots spine (sylvestris).</p> <p>Decision Sought:</p> <p>1. A description of Abel Tasman and in Nelson Lakes National Parks needs to be included.</p>		
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<ol style="list-style-type: none"> 2. Specific sites within the Parks need to be identified, so that the rule is targeted only to those sites. 3. Douglas fir and Radiata pine cannot be defined as pests. The Ministry for Primary Industries has provided guidance to regional councils that these species are to be excluded from Pest Management Plans as they are highly valuable commercially grown species. Remove these species from the list of pests. 4. There is no evidence of this analysis, undertake this work to ensure compliance with the NPD. 5. Delete this site-lead programme. 		
<p>Submitters:</p> <p>16797 Nelson Forests Ltd</p> <p>17579 Tasman Pine Forests Ltd</p> <p>Matter:</p> <p>Rule 6.5.1</p> <ol style="list-style-type: none"> 1. The rule only applies to land adjoining Mount Richmond Forest Park, Nelson Lakes and Abel Tasman National Parks. 	<p>As above.</p> <p>This change would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a Plan change.</p> <p>Staff recommend better dealt with by a plan change</p>	<p>As above</p>

<p>2. There are examples of wilding species planted in Mt Richmond Forest Park (e.g. near Beeby’s Knob).</p> <p>3. There was no requirement for established legacy trees on the listed public land to equally be managed (eradicated) for wilding spread.</p> <p>1. The rule details states: Over the duration of this plan, occupiers within the specified areas of land adjoining Mt Richmond Forest Park, Nelson Lakes and Abel Tasman National Parks Clauses 4(1)(d) and (2)(d) to subclause 38 of the National Policy Direction for Pest Management, requires that site-lead programmes must adequately identify the places to which the programme applies. This has not been achieved.</p> <p>2. Subclause 39 of the National Policy Direction for Pest Management requires land occupiers to have sufficient certainty on whether or not they are subject to site-lead pest programs. This has not been provided the Regional Pest Management Plan.</p> <p>The rule detail states: Over the duration of this plan, occupiers within the specified areas of</p>		
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<p>land adjoining Mount Richmond Forest Park, Nelson Lakes and Abel Tasman National Parks must destroy, prior to cone bearing, any wildings of radiata pine, Douglas fir....</p> <ol style="list-style-type: none"> 1. Wildings from Douglas fir and radiata pine are present within any plantation forest. These wildings do not present any greater risk to places of value than the planted forest. 2. There would be unreasonable costs associated with removing wildings from a plantation forest and the NES-PF already has regulation that provides for their removal from places of value within the forest estate. <p>The explanation states: the purpose of this rule is to reduce the distribution of these pests in parts of the region. The rule will not achieve this as there is no requirement for those who manage/occupy the “places of value” to eradicate wildings.</p> <p>Decision Sought:</p> <p>Also apply the rule in ATNP and NLNP and provide specific identification of where it applies or delete this rule entirely as it will not achieve its purpose.</p>		
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Delete Douglas fir and Radiata Pine as per MPI Guidance.		
<p>Submitter:</p> <p>19146 Mr Ian Thorneycroft</p> <p>Matter:</p> <p>Do not include Pinus Radiata and Douglas Fir as pests in all situations. In particular isolated stands surrounded by non-sensitive land uses such as grazing land or native forest.</p>	<p>As above.</p> <p>Best dealt with through a Wilding Conifer Plan Change and full landowner consultation.</p>	<p>As above</p>
<p>Submitter</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>As noted previously, Project Janszoon and the Abel Tasman Birdsong Trust have invested significantly in wilding conifer and weed control and made significant gains towards protecting the ecological values in and around Abel Tasman National Park. The RPMP provides an opportunity to secure these gains in perpetuity. Staff submit that site-led pest programmes may be an appropriate approach to protecting these values and securing the gains that have been made.</p>	<p>As above.</p> <p>This would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a Plan change.</p> <p>Staff recommend better dealt with by a Plan change</p>	<p>As above</p>

<p><i>Wilding conifers (Abel Tasman National Park)</i></p> <p>The inclusion of a site-led programme for wilding conifers in and around Abel Tasman National Park is strongly supported, as wilding conifers are a major threat to the Park and this aligns with the work Project Janszoon and Abel Tasman Birdsong Trust are already undertaking.</p> <p>The Proposed Plan does not define the specific area that this programme will apply to and it is unclear whether the sites are to be defined before the Councils make decisions on the Proposed Plan, or subsequently. Given the potential consequences for the occupiers concerned, the former is preferred . Project Janszoon would like the opportunity to contribute to this work.</p> <p>It is noted that this site-led programme also only applies to four wilding conifer species, when in fact there are twelve species of conifer that are identified as capable of wide-scale seedling spread in New Zealand. This omission should be rectified.</p>		
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<p>Decision Sought:</p> <p>Define the site-led programme for wilding conifers in and around Abel Tasman National Park.</p> <p>Extend the site-led programme for wilding conifers in and around Abel Tasman National Park to include all twelve species of wilding conifer.</p> <p>Create a site-led programme and/or Good Neighbour Rules for the private land enclaves within Abel Tasman National Park, if justified by more detailed cost-benefit analysis.</p>		
<p>Submitters:</p> <p>16797 Nelson Forests Ltd</p> <p>17579 Tasman Pine Forests Ltd</p> <p>Matter:</p> <p>This section states that the beneficiaries are the regional community for the protection of conservation values. The exacerbators are the occupiers who are not controlling these pests on adjoining properties.</p>	<p>As above.</p> <p>This would require extensive consultation with landowners and agencies involved. That consultation can start as soon as time permits and if agreed could be introduced by way of a Plan change.</p> <p>Staff recommend better dealt with by a Plan change.</p>	<p>As above</p>

<ol style="list-style-type: none"> 1. There are also exacerbated who are the occupiers who are not controlling these pests WITHIN the property. 2. Subclause 133 of the National Policy Direction for Pest Management states that individuals who are exacerbating the problem have a legislative right to do an activity that spreads the pest or do not have a legislative responsibility to control the pest then BENEFICIARIES should, in general, bear the costs of the RPMP. 3. Clause 8 of the National Policy Direction for Pest Management states: <i>If proposing that exacerbators bear any of the costs of the plan, how much each group of exacerbators is contributing to the problem addressed by the plan, and Subclause 146 states: the analysis must consider only current and future activities that have contributed to the problem not past activities.</i> 4. Plantation forests have been legitimately established and managed for 90 years in Tasman. The forests are defined as legacy forests under the NZ Wilding Conifer Strategy which requires wilding control 		
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<p>costs to be predominantly met by the Crown.</p> <p>Decision Sought:</p> <p>Remove plantation forest land from the exacerbators list.</p>		
<p>Submitters:</p> <p>14859 Forest and Bird Protection Society of New Zealand</p> <p>16782 Titoki Nursery Ltd</p> <p>X18113 Project De Vine Trust</p> <p>Support all</p> <p>X19154 Mike Remu</p> <p>Support re Purple Pampas</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>Matter:</p> <ul style="list-style-type: none"> • Include pampas grass. Both Jubata and selloana in RPMP 	<p>Purple pampas is the more invasive of the two main pampas species. Purple pampas only was listed as a containment pest in the 2010-2017 RPMP, with occupiers required to destroy plants on their land. However, management generally has been problematic, and control has failed to prevent further spread. This is in main due to its asexual reproduction ability and resulting distribution over extensive areas by wind (up to 25 km). Common pampas is even more widespread in the district and was historically planted by TDC/NCC. No established programmes exist as it was not in previous RPMPs.</p> <p>Three possible options are available for consideration for either or both species:</p> <ul style="list-style-type: none"> • <u>Do nothing</u> – the status quo as in proposal • <u>Sustained control</u> - with occupier rules whole region 	<p><i>Cortaderia jubata</i> is already contained within Appendix 5 of the RPMP.</p> <p>Include <i>Cortaderia selloana</i> in Appendix 5. Added to new Appendix 2.</p> <p>Encourage community groups to submit to TDC for site led pest control programmes, which might warrant inclusion in a RPMP programme or remain as part of a Bio Strategy.</p> <p>Above text added to pampas in appendix 2.</p>

	<ul style="list-style-type: none">• <u>Progressive containment</u> - with occupier rules (could be limited to just in Golden Bay). <p>Either of the two control options would require occupier rules to be developed, publicised and enforced. A major investment would be needed to include pampas species in the RPMP. No formal CBA analysis was done for the Plan Proposal.</p> <p>Staff experience from undertaking previous CBAs on common and widespread pests is that the imposition of rules would generally outweigh the benefits. However, this doesn't preclude occupiers undertaking control for their own benefit. CBAs help councils to prioritise limited funding on plants that can be managed or have limited distributions.</p> <p>With regard to the 'doing nothing' option, it should be noted that neighbouring Marlborough District Council has declined to include purple pampas (or common pampas) in its latest RPMP on the basis that it occurs in all parts of the district at varying densities. Being widespread and wind spread does not lend itself to management under a species-led approach. The pampas situation in TDC/NCC is similarly placed, and some observers would suggest 'we've lost the fight with</p>	
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	<p>purple pampas'. There is also a lack of tools to tackle pampas on the landscape scale that would be required.</p> <p>Council still considers purple pampas as an organism of interest (Appendix 5) and there are options for considering it in the TDC/NCC Bio Strategy, to be controlled in a non-regulatory way at appropriate places (e. through community extension initiatives).</p>	
<p>Submitters: 14859 Forest and Bird – Gillian Pollock</p> <p>Matter: Need to remove pampas <i>Cortaderia jubata</i> and <i>Cortaderia selloana</i> from Council administered land. Oral – Develop Council Policy of planting natives on Council administered land. Consider Bylaw controlling urban garden weeds.</p>	<p>These species may be better as subjects of a Bio Strategy.</p> <p>If these species are included as pests in the Plan, then it follows that the Councils will need to manage these pests on Council land. A cost estimate for this cannot be produced until the plan identifies the extent to which occupiers must control their pests and where (in what parts of the District and City).</p>	<p>Jubata is already contained within Appendix 5 of the RPMP.</p> <p>Include <i>Cortaderia selloana</i> in Appendix 5 (new Appendix 2).</p> <p>Encourage community groups to submit to TDC for site led pest control programmes, which might warrant inclusion in a RPMP programme or remain as part of a Bio Strategy.</p> <p>Above text added to pampas in appendix 2.</p>

<p>Submitters:</p> <p>16797 Nelson Forests Ltd</p> <p>17579 Tasman Pine Forests Ltd</p> <p>X18113 Project De Vine Trust</p> <p>Support</p> <p>X18119 Nelson-Tasman Forest and Bird.</p> <p>Support</p> <p>Matter:</p> <p>Purple Pampas is an economic threat to plantation forests and disturbed indigenous areas it is a self-pollenating, tall, erect, perennial grass that forms tussock up to 3 m high. It produces large quantities of seed that can be carried long distances by wind. It rapidly invades roadside areas and young forest plantations, smothering young trees and making access difficult and costly. As stated in the Regional Pest Management Strategy 2012 - 2017, <i>“the combination of prolific seeding, extensive wind distribution, and its ability to colonise disturbed land from sea level up to 800 m and dominate the site for many years, make it a serious long-term pest”</i>. There is no</p>	<p>As above.</p>	<p>Jubata is already contained within Appendix 5 of the RPMP.</p> <p>Include Cortaderia selloana in Appendix 5.</p> <p>Encourage community groups to submit to TDC for site led pest control programmes, which might warrant inclusion in a RPMP programme or remain as part of a Bio Strategy.</p> <p>Above text added to pampas in appendix 2.</p>
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<p>justification for Purple Pampas to not be in the Regional Pest Management Plan.</p> <p>Decision Sought:</p> <p>Add Purple Pampas to the Regional Pest Management Plan as a sustained control pest in parts of the Tasman-Nelson region. The area of control would be Hira, Golden Downs and Tasman (and other areas that may be better identified through consultation with the council and the other plantation forestry managers). The rule format would follow the specific rule format for rules 6.4.2 - 6.4.5.</p> <p>Another option for Purple Pampas would be a boundary control rule. But this is not the preferred option. A boundary setback of a minimum of 100 metres would be required.</p>		
<p>Submitter:</p> <p>17583 Project De-Vine Trust</p> <p>Matter:</p> <p>Declare Purple Pampas as progressive containment for all of Golden Bay</p> <p>Decision Sought:</p>	<p>See above.</p>	<p>Jubata is already contained within Appendix 5 of the RPMP.</p> <p>Include Cortaderia selloana in Appendix 5.</p> <p>Encourage community groups to submit to TDC for site led pest control programmes, which might warrant inclusion in a</p>

		<p>RPMP programme or remain as part of a Bio Strategy.</p> <p>Above text added to pampas in appendix 2.</p>
<p>Submitters:</p> <p>16798 Federated Farmers of New Zealand</p> <p>X18119 Nelson- Tasman Forest and Bird.</p> <p>Support</p> <p>16784 Simpsons farm</p> <p>16797 Nelson Forests Ltd</p> <p>17579 Tasman Pine Forests Ltd</p> <p>Matter:</p> <p>Include GNR rules to bind crown agencies</p>	<p>Agree with respect to introducing a GNR for gorse and broom outside Howard – St Arnaud. An initial quantitative CBA concludes that opting in all land owners (including the Crown) is cost beneficial.</p> <p>Before finalizing the GNR rules it is recommended that a modest CBA is performed to test the ranges of assumptions and break-even limits on the cost imposed on occupiers by GNR.</p> <p>GNR’s related to Wilding Conifers will be considered as part of and WC plan change.</p>	<p>New analysis by staff and independent consultants indicates that the inclusion of a good neighbor rule is warranted.</p> <p>New GNR’s for gorse and broom developed and included in both RPMP and CBA. See 6.4.18 and 6.4.19.</p>

7. Part Three Matters: Procedures - Powers (8) Funding (9) and Appendices 1-5

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>The monitoring section of the RPMP should be supported by a more detailed monitoring/surveillance plan covering each pest (or group of pests), which should include details of where monitoring will occur, by whom, when (time of year), how (methods), and how often (frequency). Whilst this level of detail may not be appropriate within the RPMP itself, it would be</p>	<p><u>Regarding decision sought (1)</u> - monitoring (and related inspections) and surveillance activities carried out by biosecurity staff as per annual work programmes (for each species or group of pests, where relevant) will be fully outlined in the RPMP Operational Plan (as required under Section 100B of the BSA). The Operational Plan will contain the level of detail as suggested by the submitter. Progress on attaining these results/outcomes will be reported as part of the annual biosecurity report.</p> <p>Equally, the Operational Plan will outline all compliance and enforcement activities carried out, in a separate but related section to monitoring and inspections.</p> <p>While mention is made of TDC preparing an Operational Plan (as noted in section 7.2(a) of the Proposal) this section could be widened to include an <u>overview statement of what the plan</u></p>	<p>Expand and edit Section 7.2A and Table 14 to anticipate results and include more accurate indicators. Develop an operational plan which will include the level of detail requested by submitters.</p> <p>Added text to 7.2 and decision also reflected in new table 12.</p>

<p>desirable to signal that such a plan is required, together with the timeframes and accountabilities for its preparation and implementation.</p> <p>The RPMP – or the more detailed monitoring/surveillance plan – should also address how the Councils will monitor and enforce landowners/occupiers’ compliance with the rules in the RPMP.</p> <p>Decision Sought:</p> <p>Reference intention to prepare a more detailed monitoring/surveillance plan covering each pest (or group of pests), to include details of where monitoring will occur, by whom, when (time of year), how (methods), and how often (frequency).</p> <p>Amend Table 14 to ensure that:</p> <ul style="list-style-type: none"> • Anticipated results for each programme are consistent with 	<p><u>contains</u> – e.g. that locations of monitoring, how monitoring will be carried out and frequencies will be defined for each species.</p> <p>With regard to <u>decision sought (2)</u> consistency of Table 14 with NPD requirements, refer to submission point below.</p>	
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<p>the objective/intermediate outcome for that programme.</p> <ul style="list-style-type: none"> Indicators and monitoring methods are appropriate for the anticipated results/objectives that are being reported against. 		
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>The ‘anticipated results’ specified in Table 14 should be consistent with the objectives/ intermediate outcomes for the relevant management programme; and the indicators and monitoring methods should provide information on whether the anticipated results/ objectives are being achieved. With this in mind, I note that:</p> <ul style="list-style-type: none"> The objective for the progressive containment programme (as stated in the NPD) is “<i>to contain or reduce the geographic</i> 	<p>Progressive containment:</p> <p>Staff agree that consistency is crucial and suggest that the <u>anticipated results for Progressive Containment</u> be amended as follows (to capture the intent of the NPD more clearly, in a two-piece approach to wording) – ‘(i) Prevent the spread of pest populations outside of (2018) mapped areas; and (ii) where practicable reduce pest populations within the mapped areas.’</p> <p><u>Revised indicators</u> will reflect the above outcomes expected – (i) absence of pests occurring outside of named sites; and (ii) as stated, reductions in the number or density of pests within specified areas.</p> <p>The intent is to have a roll-back of infestations occur through coordinated control based on occupier rules to control the named pests. This will require vigilance and relationship building by TDC/NCC with occupiers in these areas.</p>	<p>Expand and edit Section 7.2A and Table 14 to anticipate results and include more accurate indicators. Develop an operational plan which will include the level of detail requested by submitters.</p> <p>Refer text just after new table 12, noting that cultural indicators may be developed over the duration of the Plan.</p>

<p><i>distribution of the subject, or an organism being spread by the subject, to an area over time”</i>; the anticipated result and associated indicators should therefore address the geographic distribution of the pests in question, not just the size of the pest population within a specified area.</p> <ul style="list-style-type: none"> • The focus of the site-led programme is on protecting values in places; the anticipated result and associated indicators should therefore address whether the values at place are being adequately protected. • With respect to site-led programmes which involve controlling animal pests, neither the indicator (number of pest animals killed) or monitoring method (records of animal pests killed) will establish whether pest animal populations are reducing to zero density within the specified area, or whether 	<p>Site-led (protecting values at places):</p> <p>Again consistency is required, and it is suggested that <u>anticipated outcomes</u> for site-led pests be changed to wording similar to: ‘Biodiversity values are enhanced to maintain overall ecological integrity’. No distinction between the plants and animals controlled is necessary – numbers of animals killed, or plants destroyed are outputs, not outcomes.</p> <p><u>Indicators</u> will vary site to site and could include for example (for the Waimea Estuary site):</p> <ul style="list-style-type: none"> • an [xyz] % increase in forest/vegetation canopy cover (as a result of intensive possum control) • % increase in desirable (named) species (vegetation that possums favour to browse – like kohekohe), through vegetation plots/sampling (resulting from removal of possums) • % increase in desirable (named) species (birds/invertebrates), through census/count data (resulting from removal of predators) • % increase in range and distribution or above desirable species, through surveys (presence / absence mapping increases annually). 	
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<p>the values at the site are being adequately protected.</p> <p>Decision Sought:</p> <p>Amend Table 14 to ensure that:</p> <ul style="list-style-type: none"> • Anticipated results for each programme are consistent with the objective/intermediate outcome for that programme. • Indicators and monitoring methods are appropriate for the anticipated results/objectives that are being reported against. 	<p><u>Monitoring methods</u> could be enhanced to note records of pests killed – “to or using identifiable indicator targets (e.g. rat tracking index – RTI or residual trap catch index for possums - RTCI). This level of detail is however best left to be contained in operational plans.</p>	
<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>Matter:</p> <p>Whilst I have not considered these sections in detail, I note that the Cost-Benefit Analysis summarised in the Proposed RPMP (and detailed in the supporting document) appears to focus only on costs to the Tasman District Council, and how these costs</p>	<p>The original CBAs for pests that have occupier costs associated with them have been independently reviewed. As part of the plan forming process, the review identifies that revised CBAs will be needed for: any new pests added; pests where the control programme type is proposed to change; or where the pest may be subject to new good neighbour rules. Occupier costs to be revised for these.</p> <p>The review also identified that the Yellow bristle grass (not proposed for change) is a significant enough programme that the occupier costs should be revised, and a quantitative CBA performed.</p>	<p>The original CBAs have been independently reviewed and occupier costs were included in the review and are appropriate. This review will be formally written up in the CBA supporting document.</p> <p>CBA documents were updated.</p>

<p>will be met; but have not considered the costs to occupiers associated with compliance with the Rules included in the Proposed RPMP. I believe that an expanded cost-benefit analysis may be required to ensure that all costs (and benefits) associated with implementation of the RPMP have been considered.</p> <p>Decision Sought:</p> <p>Assess need for expanded cost-benefit analysis to assess all costs (and benefits) associated with implementation of the RPMP, including costs to occupiers associated with compliance with the Rules included in the Proposed RPMP.</p>	<p>The review identified that the qualitative CBAs performed for all of the other pests that have occupier obligations meet the requirements of the NPD and therefore a new quantitative analysis to include occupier costs is not warranted.</p>	
<p>Submitters:</p> <p>16794 Golden Bay Branch of Forest and Bird</p> <p>X18119 Nelson- Tasman Forest and Bird.</p>	<p>Appendix 5 serves as a list for other harmful organisms to be noted, that are already present in the district/city, and which eradication is not technically feasible or regulatory intervention reasonable (i.e. fails NPD criteria). The list is currently quite considerable (37 pests or groups of pests). Potentially this list</p>	<p>Review Appendix 5 to include plant and animal pests of concern to the Nelson/Tasman community and raised through this process.</p> <p>Encourage community groups to submit to Council for site led pest</p>

<p>Support</p> <p>Matter:</p> <p>Review Appendix 5 (Organisms of interest) to include other plant and animal pests such as Tradescantia, Periwinkle, ivy, alder, karo, silver birch, willow, yew, stoats, possums, rats outside site lead areas.</p> <p>Decision Sought:</p>	<p>could be very long (almost inexhaustible) if every perceivable pest was included.</p> <p>Having such a list under the BSA / RPMP framework is not required, however there is some merit in including other organisms that are ‘on the radar’ of the public, especially those identified through previous public processes and consultation.</p> <p>This RPMP section/appendix could be streamlined to:</p> <ul style="list-style-type: none"> • Only include organisms that aren’t already named as pests in the existing management categories (regardless of whether they are a pest in the whole or only part of the district); • Possibly note them as ‘advisory pests’ – i.e. they have no official status under the RPMP or BSA, but a ‘listing’ here indicates that they are undesirable and have some unwanted effects that occupiers in the district should be aware of; and • The list should be limited to only those that TDC/NCC consider to be most relevant to members of the public. <p>An alternative option would be to delete Appendix 5 altogether and replace it with linkages to national lists and sites such as</p>	<p>control programmes which might warrant inclusion in a Programme or should remain as part of Bio strategies.</p> <p>Staff to include hyperlinks to national websites through the Nelson/Tasman Council websites.</p> <p>Updated Appendix 2 with numerous pests added.</p>
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	<p>unwanted organisms list (although some are already covered in section 4.3), the NPPA list, Weedbusters, pest pet lists etc.</p> <p>On balance it would seem beneficial to have a list of these 'organisms of interest' in the RPMP (such as in an appendix) but readers should be directed to a relevant section (yet to be written) of the TDC/NCC Bio Strategy which would address these organisms in more detail (as part of a non-regulatory approach to supporting communities). Many individuals and groups control some of these pests voluntarily and TDC/NCC should be seen as supporting them by providing some level of recognition and information. The place for this is in the Bio Strategy not the RPMP. Essentially, TDC/NCC could choose to support control of <u>any pest</u> affecting a place through non-regulatory programmes.</p>	
<p>Submitters: 16795 Mr Roy Bensemann</p> <p>Matter: Supports Funding from General Rate</p> <p>Decision Sought:</p>	<p>Submission noted. No change required.</p>	<p>Support staff recommendation to fund from general rate.</p>

<p>Submitters: 16798 Federated Farmers of New Zealand</p> <p>Matter: Supports at least part funding from Uniform Annual Charges</p> <p>Decision Sought:</p>	<p>Making this change would tend to decrease the amount of money paid by larger ratepayers and increase the amount paid by smaller ratepayers.</p> <p>While this would reduce the cost to larger landowners it would significantly increase the cost to small landowners and urban dwellers.</p> <p>As many programmes control production pests the benefit falls to larger landowners and this is more equitable by funding from the general rate.</p> <p>Staff recommend no change.</p>	<p>Support staff recommendation to fund from general rate.</p>
<p>Submitters: 17586 (MPI)</p> <p>Matter: Table 14 Sabella should also refer to monitoring of oyster and fish farms which can harbour Sabella. Amend “feedback” from mussel farmers to read “reports from marine farmers and other persons,</p>	<p>Staff agree that the inclusion of reference to monitoring of other marine farm types makes sense.</p> <p>Staff recommend making that part of the change sought.</p> <p>Regarding the request to change Sabella to an eradication programme. Currently we do not have the tools to achieve eradication in the marine environment due to the prolific reproduction rates of these species and their spread by currents</p>	<p>Supporting monitoring of Sabella on other types of marine farms.</p> <p>Move Sabella to the eradication programme.</p> <p>Refer to new table 3 and specific rule 6.2.6.</p>

<p>and inspections by experienced staff”.</p> <p>Amend Appendix 4 (P111) to treat Sabella as eradication.</p>	<p>and tides. We also suffer from constant re infestation from other parts of the country via vectors such as fouled vessels and gear arriving in our region.</p> <p>Staff recommend no change to programme.</p>	
<p>Submitter:</p> <p>17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>Define iwi in glossary</p> <p>Decision Sought:</p> <p>Define as “ A recognised iwi authority with interests in Te Tau Ihu”.</p>	<p>Staff recommend making the change.</p>	<p>Agree and support the submission to recognize Iwi with interests in Te Tau Ihu.</p> <p>Added - see glossary amendment made as well as specific mention of the eight iwi of the ‘Top of the South’ in section 2.4.</p>
<p>Submitter</p> <p>17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>Monitoring should be partially funded by general rates and focus on</p>	<p>Monitoring is fully funded by general rate.</p> <p>Recommend no change.</p>	<p>Support staff recommendation to fund from general rate.</p>

priority area. Use of photographic evidence. Decision Sought:		
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8. Any Other Matters Raised (not covered under above structure)

Submission summary/decision requested	Staff analysis/comments	Council decision
<p>Submitters: 14848 Mr Bryce Buckland</p> <p>Matter: The RPMP should embrace future gene drive technology</p> <p>Decision sought:</p>	<p>The RPMP Proposal is based on management techniques that are currently available.</p> <p>The Plan Proposal could recognise that research undertaken as part of the Predator Free 2050 initiative may in the future improve our ability to control some pests and may lead to a re assessment of pests and programmes.</p> <p>Note: The plan itself does not specify how a pest is to be controlled, only that it must be. The choice of control method must be made by the occupier involved.</p> <p>Staff recommend include reference to research undertaken as part of the Predator Free 2050 initiative which may in the future improve our ability to control some pests.</p>	<p>Agree with staff recommendation to include reference to research undertaken as part of the Predator Free 2050 initiative which may in the future improve our ability to control some pests.</p> <p>Reflected in Table 12, regarding good practice methods to be used, see also new footnote 7.</p>

<p>Submitters: 16767 Mr Dan McGuire</p> <p>Matter: Oppose the use of toxins (specific vertebrate).</p>	<p>The RPMP Proposal does not specify what control techniques are to be used.</p> <p>Staff recommend no change.</p>	<p>Expand and edit Section 5 and elsewhere to articulate legal requirements and best practice management of herbicides, pesticides and other control methods.</p> <p>New footnote 5 in section 5 – see Principal Measure (e) and new wording in section 7.2 relating to service delivery activities (2nd bullet point).</p> <p>Develop an operational plan which will include additional levels of detail requested by submitters.</p>
<p>Submitters: 16781 Ms Helen Black</p> <p>Matter: Oppose use of toxins both plant and animal.</p>	<p>As above.</p>	<p>Expand and edit Section 5 and elsewhere to articulate legal requirements and best practice management of herbicides, pesticides and other control methods.</p> <p>New footnote 5 in section 5 – see Principal Measure (e) and new wording in section 7.2 relating to service delivery activities (2nd bullet point).</p>

		Develop an operational plan which will include additional levels of detail requested by submitters.
<p>Submitter: 17587 Ngati Kuia and Ngati Apa</p> <p>Matter: Provide guidance on appropriate use of herbicides and pesticides especially where aquatic herbicides are used in areas where watercress and puha are utilised.</p> <p>Decision Sought:</p>	<p>Staff acknowledge iwi concerns about the application of herbicides to control aquatic pests such as egeria, lagarosiphon and spartina under the proposal and the effects these actions may have on traditional food gathering. Providing guidance at the level sought is possibly better dealt with through subsequent operational plans developed for these pests (the where and how of control).</p> <p>The Environmental Protection Authority (EPA) has modified approvals for the key herbicides used in aquatic pest plant control, containing the active ingredients metsulfuron-methyl, Haloxyfop-R-methyl, imazapyr isopropylamine and triclopyr triethylamine salt. These substances can now be applied onto or into water as herbicides to control aquatic pest plants but with strict conditions. The EPA considers these substances beneficial in the control of aquatic pest plants and more effective than other methods of control. The factsheet Using herbicides to control aquatic pest plants outlines the issues and risk mitigation required in more detail (refer to link).</p>	<p>Expand and edit Section 2.6 and 5 and elsewhere to articulate legal requirements and best practice management of herbicides, pesticides and other control methods.</p> <p>Develop an operational plan which will include additional levels of detail requested by submitters.</p> <p>Recognise the special interest of iwi within the document.</p> <p>Interests of iwi in Te Tau Ihu are covered in more detail in two places (following further commentary received):</p> <ul style="list-style-type: none"> • Section 2.4, (additional text)

	<p>https://www.epa.govt.nz/assets/Uploads/Documents/Hazardous-Substances/Guidance/Using-herbicides-to-control-aquatic-pest-plants.pdf</p> <p>Conditions expressly require engagement with iwi directly, with an example given when using Haloxyfop to control spartina, as follows. <i>“Iwi may have local knowledge relating to the behaviour of whitebait and elvers. Local iwi should be consulted in relation to the mātauranga Māori for the area before the substance is applied”.</i></p> <p>Notwithstanding the above comments, section 2.6 of the Proposal regarding the RPMP relationship with Maori could be expanded to address issues raised by Ngati Kuia and Ngati Apa, such as widening the first paragraph to include the following wording – <i>The Plan’s implementation is anticipated overall to have positive effects on Maori culture and traditions, for example reducing aquatic species such as egeria and spartina, which displace native and desirable species and inhibit access to waterways. Iwi have expressed concerns about the application of toxins to land and water and effects on native species. There are stringent controls applied by the EPA regarding using named herbicides over water, including the obligation on operators to engage with iwi to mitigate risks.</i></p>	<ul style="list-style-type: none"> • Monitoring section 7.1, after Table 12.
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<p>Note</p> <p>The following material does not constitute a formal submission for the purposes of the Plan Proposal Process. It comprises supporting advice commissioned by Nelson City Council regarding a Maori perspective on pest management in response to the limited feedback from iwi.</p> <p>Formal decisions cannot be made on the matters raised unless there are other formal submissions raising these matters or the changes are of a technical in nature and do not alter the impact of the Plan Proposal on any party.</p> <p>Matter:</p> <p>Although the concept of kaitiakitanga is mentioned, there is little to explain its importance.</p> <p>Māori values are not specifically explored in the Plan, including the role of culturally significant</p>	<p>Staff Recommendation</p> <p>Expand on kaitiakitanga and Māori values and potential for iwi/ Māori involvement on implementation under RPMP paragraph 2.6 Relationship with Māori.</p> <p>Consider Māori involvement in future Plan reviews.</p>	<p>Receives the Tasman District Council/Nelson City Council Regional Pest Management Plan Through a Maori Lens supporting document. Acknowledges the content can feed into meeting the Plan’s requirements under Section 72.1c</p> <p>Expand on kaitiakitanga and Māori values and potential for iwi/ Māori involvement on implementation under RPMP paragraph 2.6 Relationship with Māori.</p> <p>Consider Māori involvement in future Plan reviews.</p> <p>Strengthen relationships with iwi through the Operational Plan.</p> <p>Staff to refer to the requirements of the National Policy Direction for Plan finalisation, particularly Section 72.1c.</p>
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<p>species, or the mauri or life supporting capacity of freshwater.</p> <p>Involve iwi/Māori in the monitoring regime for the Plan.</p> <p>Consider Māori involvement in the development of future Plan reviews.</p>		
<p>Submitters:</p> <p>16771 Mrs Pamela Pope</p> <p>Matter:</p> <p>Increased education regarding NPPA species and free dumping of garden waste.</p>	<p>Staff agree and recommend development of a Bio Strategy addressing education and service delivery matters.</p>	<p>Agree with staff recommendation.</p>
<p>Submitters:</p> <p>14825 Ms Alison Pickford</p> <p>Matter:</p> <p>Provide free/subsidised stoat traps to landowners adjoining commercial or indigenous forest.</p> <p>Decision sought:</p>	<p>Staff agree, however, this is not a RPMP matter. We have an existing programme of loaning traps and are looking at ways of subsidising volunteer purchases.</p> <p>Staff consider this is best dealt with via a Bio Strategy outside the Plan Proposal.</p>	<p>Agree with staff recommendation.</p>

<p>Submitters: 17587 Ngati Kuia and Ngati Apa</p> <p>Matter: Encourage the use of approved traps on private land and provide subsidies for their use and installation.</p> <p>Decision Sought:</p>	<p>As above.</p>	<p>Agree with staff recommendation.</p>
<p>Submitters: 16794 Golden Bay Branch of Forest and Bird X 18113 Project De Vine Trust Support 16796</p> <p>Matter: Support landowners to control vine invaders and in particular</p>	<p>Staff agree. Staff recommend Bio Strategy providing council commitment to specified education and service delivery.</p>	<p>Agree with staff recommendation.</p>

<p>Yellow Jasmine on land which is reverting to native vegetation.</p>		
<p>Submitters:</p> <p>14848 Mr Bryce Buckland 16781 Ms Helen Black</p> <p>Matter:</p> <p>Provide support including traps to volunteer groups undertaking pest control particularly on Council managed land.</p> <p>Decision Sought:</p>	<p>Staff agree.</p> <p>Staff recommend Bio Strategy providing council commitment to specified education and service delivery.</p>	<p>Agree with staff recommendation.</p>
<p>Submitter:</p> <p>16784 Simpsons Farm</p> <p>Matter:</p> <ul style="list-style-type: none"> • Provide guidance on what has changed between the RPMS and RPMP provisions. • Better define terms such as “reasonable time” for entry. • Explain who was consulted. <p>Decision Sought:</p>	<p>The matter of reasonable time is already dealt with through both the National Biosecurity Act Enforcement Manual and through Authorized Person training.</p> <p>Staff recommend no change.</p> <p>Regarding changes between RPMS and RPMP these will be dealt with in the Section 75 Report.</p> <p>Recommend no change.</p>	<p>Agree with staff recommendation of no change.</p>

<p>Submitters:</p> <p>16796 Northern South Island Department of Conservation</p> <p>17580 Project Janszoon</p> <p>Matter:</p> <p>Consider preparing a Pathway Management Plan for pests transferred in gravel.</p> <p>Decision Sought:</p> <p>Undertake cost-benefit analysis for a pathway management plan for weeds that are transported in gravel/hardcore used for roading etc, where management controls at the point of extraction and sorting (quarries, river-bed extraction sites) would reduce the spread of pest weeds through the region. Include this programme in</p>	<p>Staff Agree.</p> <p>However this is a separate plan and process.</p> <p>Staff recommend that Councilors consider this request and if they agree recommend to their Councils the preparation of a pathway management plan for aggregate.</p>	<p>Recommend that TDC and NCC prioritise preparing a pest Pathway Management Plan for aggregate.</p> <p>Noted – pathway plans are outside the scope of this RPMP and are a separate plan and process.</p>
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<p>the RPMP if it is found to be feasible and cost-effective.</p>		
<p>Submitter: 16993 Nelson City Council</p> <p>Matter: Include a restatement of the intermediate outcome within each pest rule in Section 6.</p>	<p>This is a matter of style. The change sought may assist ease of reading the document but makes for a bulkier repetitive document.</p>	<p>Supports submission to include intermediate outcomes within each pest rule or within the objectives of Section 6 (i.e. the title of each).</p> <p>Change made regarding the objective for each programme - refer to example at 6.1.</p>
<p>Submitter: 16994 Brook Waimarama Sanctuary Trust</p> <p>Matter: Prepare an NCC – TDC Bio strategy which integrates activity including work by DoC, Janszoon, Trusts and other volunteer groups.</p>	<p>Staff agree that this should be done. A Tasman District Council bio-strategy is on the work programme and attempts will be made to combine or co-ordinate with both NCC and MDC.</p> <p>Staff recommend best dealt with by bio-strategy.</p>	<p>We encourage TDC and NCC to align their bio strategies. Agree with recommendation.</p>
<p>Submitter: 17584 Royal Forest & Bird Protection Society of NZ</p>	<p>Committee will need to consider.</p> <p>Yes. Tasman District Council has a Bio Strategy on its work programme (to be developed) and Nelson City Council already has a Biodiversity Strategy in place.</p>	<p>We encourage TDC and NCC to align their bio strategies. Agree with recommendations.</p>

<p>Matter:</p> <p>Forest & Bird seeks the Councils do the following:</p> <ol style="list-style-type: none"> 1. Increase the number and geographical spread of species in the RPMP. 2. Significantly increase funding for pest control across the whole region so that more effective control can be undertaken within the RPMP. 3. Develop a Council-led biodiversity strategy for the whole of the region that includes active involvement from those people and organisations that have specific knowledge and expertise in these matters (not just limited to statutory agencies, or delegated to Tasman Environmental Trust). This could build on the work, or similar model, to the Nelson Biodiversity Forum that has helped achieve significant 		<p>Review the impact of climate change at each Plan review.</p>
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<p>increase in focus and funding and has strong community buy-in because of that process.</p> <p>Forest & Bird seeks the Councils include the following:</p> <ol style="list-style-type: none"> 1. A list of problematic species that would benefit from specific funding directed at ongoing monitoring of extent and problem. Such species could include a range of common and more site-specific pests, e.g.: <ol style="list-style-type: none"> a. Argentine and Darwin ants b. Old Man's Beard c. Purple pampas d. Wasps e. Mustelids f. Marram 	<p>These species are already part of NPPA and Unwanted Organisms list.</p> <p>Staff recommend including link to these lists in the RPMP Proposal.</p>	
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<p>2. A list included in the plan of species that may not be directly included in any of the categories, but should not be for sale, or other forms of distribution.</p> <p>Forest & Bird seeks that Council undertake the following:</p> <p>1. A risk analysis of the implications for the spread of pest species due to current predictions of climate change factors, including storms, sea level rise, warmer temperatures, etc.</p>	<p>Staff agree that this needs to be considered however think it should form part of the next review or an earlier change if circumstances such as improved national guidance require.</p> <p>Staff recommend this is best dealt with by plan change.</p>	
<p>Submitter:</p> <p>17584 Royal Forest & Bird Protection Society of NZ</p> <p>Matter:</p> <p>The funding of pest control in the region is small comparative to other regions of similar size, with similarly concerned populations –</p>		<p>The Committee agrees. Funding is subject to agreement of full Council. Encourage community groups to submit to the Long Term Plan for additional funding requests and educate the community on responsible attitudes to weeds and animal pests.</p>

<p>who don't necessarily have the same level of biodiversity that this region has.</p> <p>Decision Sought:</p> <ol style="list-style-type: none"> 1. Forest & Bird seeks that Councils increase their expenditure on pest control and include this in the upcoming Long Term Plan reviews, and budget for accordingly in the Annual Plans. 		
<p>Submitters:</p> <p>14825 Ms Alison Pickford</p> <p>X18119 Nelson-Tasman Forest and Bird</p> <p>Support</p> <p>X 18124 Native Bird Recovery Richmond</p> <p>Support</p> <p>Matter:</p>	<p>Councils do provide some support to volunteer groups, but this is outside the RPMP. With more resources we could do more, but we need additional staff as well as money in order to have the capacity.</p> <p>Tasman District Council staff are currently working with TET to try to establish a trapping coordinator position and are actively re-engaging with Weedbusters at the national level.</p> <p>Staff recommend best dealt with through Bio Strategy and LTP processes.</p>	<p>Agree with submissions and staff response and recommendation.</p>

<p>Support volunteer Weedbusters Groups. Help establish new groups</p> <p>Manage garden escapees, Pest pets (cats). Use community service labour. Make traps available</p> <p>Decision sought:</p>		
<p>Submitters:</p> <p>17587 Ngati Kuia and Ngati Apa</p> <p>Matter:</p> <p>Notify iwi authorities of decisions related to their submission.</p> <p>Decision Sought:</p>	<p>This will be done via the Section 75 report. All submitters and further submitters will be notified where they can view the report.</p>	<p>This will be as per Section 73 and 74 via Section 75. The Deliberations document will form the basis of the Decisions Report (this document) which will be made publicly available during the Section 75 process.</p>

