

Notice is given of a Regional Pest Management Joint Committee Hearing to be held on:

**Date:** Monday 27 May 2024  
**Time:** 9:30am - Hearings  
**Meeting Room:** Tasman Council Chamber  
**Venue:** 189 Queen Street, Richmond  
**Zoom conference link:** <https://us02web.zoom.us/j/84491379925?pwd=bFhWQWhBa1RWWFhRNk1OdWRqMVp3UT09>  
**Meeting ID:** 844 9137 9925  
**Meeting Passcode:** 737960

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## Regional Pest Management Joint Committee

### HEARING AGENDA

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MEMBERSHIP	Tasman District Council	Nelson City Council
<b>Chairperson</b>	Cr C Butler	
<b>Deputy Chairperson</b>		Cr R Sanson
<b>Members</b>	Deputy Mayor S Bryant	Cr M Benge
	Cr M Kininmonth	Cr A Stallard

Quorum 3 members – (a member from each Council must be present)

Contact Telephone: 03 543 8400

Email: [councildemocracy@tasman.govt.nz](mailto:councildemocracy@tasman.govt.nz)

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## AGENDA

**1 OPENING, WELCOME, KARAKIA**

**2 APOLOGIES AND LEAVE OF ABSENCE**

**Recommendation**

**That apologies be accepted.**

**3 DECLARATIONS OF INTEREST**

**4 CONFIRMATION OF [MINUTES](#)**

**That the minutes of the Regional Pest Management Joint Committee meeting held on Friday, 8 December 2023, be confirmed as a true and correct record of the meeting.**

**5 REPORTS**

7.1 Hearings report on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029..... 4

**6 CONFIDENTIAL SESSION**

Nil

**7 CLOSING KARAKIA**

## 7 REPORTS

### 7.1 HEARINGS REPORT ON THE PARTIAL REVIEW OF THE TASMAN NELSON REGIONAL PEST MANAGEMENT PLAN 2019-2029

<b>Report To:</b>	Regional Pest Management Joint Committee
<b>Meeting Date:</b>	27 May 2024
<b>Report Author:</b>	Guinevere Coleman, Team Leader Biosecurity & Biodiversity
<b>Report Authorisers:</b>	Rob Smith, Environmental Information Manager
<b>Report Number:</b>	RRPMC24-05-1

#### 1. Purpose of Report

- 1.1 Provide the Regional Pest Management Joint Committee with the summary of submissions received during consultation on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029
- 1.2 This report does not include the staff deliberations report or an analysis of the submissions. This will be provided to the Joint Committee before the deliberations meeting on 18 June 2024

#### 2. Report Summary

- 2.1 This report is to enable the Regional Pest Management Joint Committee to accept and hear submissions on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029
- 2.2 The consultation period was open for one month and closed on 23 March 2024. We received 101 submissions on the partial review via the Shape Tasman submission form, and 10 full written submissions. We received one late submission from Project De-Vine Environmental Trust.
- 2.3 There are 14 submitters who wish to be heard.
- 2.4 A summary of all submissions received is attached. The schedule of presenters for this hearing is attached. Subsequent changes to the schedule will be advised before the hearing commences.
- 2.5 Staff will prepare an analysis of the submissions received for the deliberations meeting scheduled for 18 June 2024.

#### 3. Recommendation

**That the Regional Pest Management Joint Committee**

- 1. receives the Hearings report on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029 report; and**
- 2. receives and considers all 101 submissions (including the late submission) on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029 received by 5.00pm 23 March 2024; and**
- 3. notes that an analysis of submissions will be provided for the 18 June 2024 deliberations meeting.**

#### **4. Background and Discussion**







- 4.1 The Regional Pest Management Joint Committee is responsible for the development and review of the Tasman Nelson Regional Pest Management Plan 2019-2029 (RPMP), a joint RPMP between Tasman District Council and Nelson City Council.
- 4.2 Under the Biosecurity Act 1993, a partial review of RPMP's can be undertaken at any time, and if the changes are deemed significant must go through appropriate consultation.
- 4.3 This partial review is considering changes to the RPMP with rule changes related to:
  - 4.1.1 Blue passion flower
  - 4.1.2 Boneseed
  - 4.1.3 Moth plant
  - 4.1.4 Pampas
  - 4.1.5 Sabella
  - 4.1.6 Vietnamese Parsley
  - 4.1.7 Water Celery
  - 4.1.8 Pest/wilding conifers
  - 4.1.9 Feral cats
- 4.4 A number of key stakeholders were included in early consultation at the request of the Joint Committee. These included government agencies, adjoining Councils, sector groups and companies, and community organisations. Feedback from this early consultation helped form the Partial Review Proposal that went to public consultation. These groups were invited to further engage in the public submission process.
- 4.5 At its Tuesday 22 August 2023 meeting, the Regional Pest Management Joint Committee resolved to recommend the draft partial review proposal to both Tasman District and Nelson City Councils for approval to notify.
- 4.6 At its Friday 8 December 2023 meeting, the Regional Pest Management Joint Committee recommended to Tasman District Council and Nelson City Council that they approve public notification of the draft Regional Pest Management Plan 2019 – 2029 Partial Review Consultation document for the partial review of the Tasman–Nelson Regional Pest Management Plan 2019-2029, commencing 23 February 2024, for a period of one month, closing on 23 March 2024.
- 4.7 Tasman District Council and Nelson City Council approved public notification of the partial review consultation document in December 2023.
- 4.8 The consultation period was open for one month and closed on 23 March 2024. We received 101 submissions on the partial review via the Shape Tasman submission form, and 10 full written submissions. We received one late submission from Project De-Vine Environmental Trust.
- 4.9 Fourteen submitters wish to be heard.
- 4.10 Staff have organised for these submitters to present their views to the Council at today's meeting. Staff have contacted all submitters that wish to be heard and have booked a time for each submitter to speak.
- 4.11 The purpose of the hearing panel is to:

- 4.1.10 consider the views of submitters (from this hearing and from the written submissions); and
- 4.1.11 decide on changes that will need to be made to the Tasman Nelson Regional Pest Management Plan 2019-2029 at the deliberations meeting on 18 June 2024.

**The hearing process**

- 4.12 A summary of all submissions received is appended as **Attachment 1**. This includes a late submission. The schedule of this hearing is attached as **Attachment 2**. A copy of the submissions made by each presenter is attached as **Attachment 3**.
- 4.13 Each submitter has been allowed a maximum of 10 minutes to speak to their submission. This time includes any points of clarification from the Regional Pest Management Joint Committee.
- 4.14 Staff have asked submitters to be available from the start of the hour that they have been assigned, and staff have allocated up to six submitters per hour. This is in anticipation that some will not use their allocated 10 minutes and that some submitters may not attend.
- 4.15 Submitters will be present either in person or on Zoom.

**5. Attachments**

1.	<a href="#"></a> <a href="#"></a> Summary of all submissions to the JRPMP partial review	7
2.	<a href="#"></a> <a href="#"></a> Draft Hearing Schedule as at 22 May 2024	119
3.	<a href="#"></a> <a href="#"></a> Submissions in speaker order	120

## Appendix 1

# Summary of Submissions

## Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019 - 2029



### Address for service:

Tasman District Council  
Management Agency for the Tasman-Nelson Regional Pest Management Plan  
189 Queen Street  
Private Bag 4  
Richmond 7050  
Phone: 03 543 8400  
Website: [www.tasman.govt.nz](http://www.tasman.govt.nz)

## 1. Introduction to report

On 23 February 2023 Tasman District Council and Nelson City Council, together, notified a Partial Review (the Proposal) of the Tasman-Nelson Regional Pest Management Plan (RPMP) for public comment. A total of 100 submissions were received by the closing date of 28 March 2024 with one further late submission received 23 April 2024. A public hearing is to be held in front of a Joint Committee, with representatives from both Councils, on 27<sup>th</sup> May 2024.

This report is a summary of submissions made. It summarises all submission points on the Proposal, in tabular form, and presented in the order of the proposed programmes as written in the Proposal. The main threads of the submissions have been captured verbatim. However, with the full written submissions received, while the authors have sought to represent each submission as faithfully as possible, a degree of interpretation and abridgement is unavoidable with respect to longer or written submissions. Therefore, where there is an abridgement to the submission in the table, there is a directive to refer to the full submission. The full written submissions are appended to the end of this summary.



## 2. Submissions

Submitter's name	Sub. point ID	Summary of Submission
<b>Overall comments</b>		
Pamela Pope	n/a	<p><i>A copy of the full Forest &amp; Bird submission is attached - Appendix 1.</i></p> <p><u>Pest plants general</u> - I highly agree that the above Plan needs to be amended and more comprehensively than is currently being proposed. I am of the opinion that both councils have been 'sleeping on the job' for years while the many pest plants spread all over the District. Some on private land, some on NCC Road reserves etc. Maybe it's high time for more education on these species, which is sadly lacking. The following is a list of species easily found on the hills around Nelson and Tasman, most of them are on the National Pest Plant Accord which means they are banned from sale, distribution or propagation (<i>a list of 20 pest plants are included as examples</i>), of which agapanthus, fan palm and creeping fig have been, sadly, actively planted by NCC.</p>
Pamela Pope	n/a	<p><u>Hedgehogs</u> - we need to pay more attention to this problem. Also, as they carry toxoplasmosis and cause massive biodiversity loss. Skinks, geckos and ground nesting birds don't stand a chance with hedgehogs around.</p>
Forest and Bird – Golden Bay Branch	n/a	<p><i>A copy of the full Forest &amp; Bird submission is attached - Appendix 1.</i></p> <p>Thank you for the opportunity to submit on the Tasman Nelson RPMP. Current animal and pest plant management undertaken by Forest and Bird in Golden Bay focuses on the coastal environment. Our priority is to provide protection and suitable habitat for our ground nesting and roosting shorebirds and seabirds - through E TORU NGA AWA: KO TAKAKA, KO MOTUPIPI, KO ONAHAU – The Three Rivers project.</p> <p>The following three points are submitted:</p> <ul style="list-style-type: none"> <li>• The Tasman Nelson Pest Management Plan has no identified sites in its Site-led programme in Golden Bay. We are asking Council to include E Toru Nga Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers project area in the Plan as part of its Site-led pests programme.</li> <li>• We are asking Council to include two additional animal species in their list of animal pests in the Tasman Nelson Regional Pest Management Plan – the European hedgehog (<i>Erinaceus europaeus</i>) and the European Brown Hare (<i>Lepus copenus europaeus</i>).</li> <li>• Forest and Bird are requesting marram grass (<i>Ammophila arenaria</i>) is a notified pest plant in E Toru Nga Awa: Ko Takaka, Ko Motupipi ,Ko Onahau – the Three Rivers site. Eradication of marram grass in the Three Rivers site would free up valuable nesting and roosting space. Nesting and roosting birds would no longer compete for space. Existing native vegetation, sand convolvulus, native spinach and sand carex would be able to flourish.</li> </ul>

Submitter's name	Sub. point ID	Summary of Submission
Cynthia McConville and  Patrick Steer	19680  19742	I am writing in support of the Forest and Bird submission on the TNRPMP. Specifically the inclusion of the Three Rivers Project area as a site-led programme and the inclusion of feral cats in Golden Bay, European hedgehogs and European brown hares in the revised plan. I have seen the impact these animals have on our coastal shorebirds and seabirds at sites where they roost and nest along our coastline.  We would like to see council take more action to support our coastal bird population through greater pest control. Specifically include the coastal area between Motupipi, Takaka and Onahau Rivers in Golden Bay - this is an internationally important area for coastal birds that has no protection from multiple plant and animal pests.
Robyn Jones	19682	I would like to support the Forest and Bird Golden Bay Branch submission to the Tasman Nelson Regional Pest Management Plan.
The Ornithological Society of New Zealand – Tasman-Nelson region	n/a	Garnering public support for the Pest Management Plan. To achieve this, the Plan needs to be credible and appropriately communicated. We were very disappointed with the sensational fearmongering that accompanied the report of a rook sighting in Stoke in 2023. Material posted on Facebook by Council included unsubstantiated comments regarding Rooks preying on 'native species, including small ground nesting birds and their eggs'. Stuff subsequently claimed that 'There have been reports of them pecking out and eating the eyes of living sheep and lambs that were immobilised.' In correspondence with your staff no reports of such behaviour were forthcoming despite us being advised that 'While the attacks are mostly carried out by crows and ravens, magpies and rooks have also been observed attacking lambs' – our own literature review also failed to find any reliable records of such behaviour. Such unsubstantiated 'information' detracts from the value and importance of the Management Plan in supporting biodiversity conservation.
Allen Berthelsen	19825	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.
Cam Carter	19824	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.
Anna Berthelsen	19823	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.
Brook Waimārama Sanctuary	n/a	Key pests for biodiversity restoration in the Nelson district don't just include ungulates – grazing animals such as goats, deer, pigs and possum, but include plants such as wilding conifers, vines like Old Mans Beard and certain insects like Vespula (German) wasps. We would like to highlight emerging pests like cats as being part of an effective pest management plan. We support a tougher stance upon cats, see specific notes below.  For all pests control we would support strongly that early control is both easier and cheaper to achieve planned outcomes. We would have hoped more pest control be set across at least the Nelson district.  We have considered the draft NCC long term plan in conjunction with the proposed pest management plan and are concerned about the long-term plan including;

Submitter's name	Sub. point ID	Summary of Submission
		<ul style="list-style-type: none"> <li>• Despite the natural environment being the first point listed in key community outcomes, there appears very little direct spending in the next 10 years for conservation.</li> <li>• Big savings in weed control- see page 87 of the activity's summaries. We see the growing weed problem across the district as serious, and only going to get worse if it is not controlled. This real threat to the NCC budget will only catch up with NCC later with even more cost and resources needed to achieve control to acceptable levels. This is a bad decision to cut spending on pest control.</li> </ul>
DOC	n/a	<p>Overall, the Partial Review is aligned with the National Policy Direction (NPD) and guidance material.</p> <p>I support the proposed amendments to the Regional Pest Management Plan (RPMP), subject to the specific comments set out in Attachment 1 to this submission.</p>
<b>Sections 1, 2 and 3 comments</b>		
DOC	n/a	<p>Whilst the RPMP has a particular statutory function and purpose, and must be prepared in accordance with the Biosecurity Act and NPD, it is desirable that it also:</p> <ol style="list-style-type: none"> <li>1. has clear strategic intent and SMART objectives (specific, measurable, achievable, relevant and time-bound);</li> <li>2. supports current strategic (regional and cross-regional) initiatives and programs for the restoration, protection and enhancement of indigenous biodiversity; and</li> <li>3. supports initiatives and programs that are currently in development, e.g. under the Kotahitanga mō te Taiao Strategy; and other collaborative landscape-scale projects that may be progressed during the period of the RPMP.</li> </ol> <p>These matters are relevant to the RPMP as a whole and to the proposal to include new pests and policies through this Partial Review.</p> <p>Whilst to a large extent the strategic initiatives and programs in (2) and (3) will depend on voluntary collaboration between partner organisations, landowners and the wider community, the RPMP can provide further strategic direction and a regulatory backstop to support the delivery of programs on the ground.</p> <p>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>

Submitter's name	Sub. point ID	Summary of Submission
<b>Proposed amendments – pest plants</b>		
<b>4.3.1 Blue passion flower</b>		
Alistair Kwan	17981	You'll need to conduct education and to resource action by occupiers. Many people are not capable of removing the plant (e.g. where it grows in a hard-to-reach area and occupier is physically frail) and is similar to how old man's beard is allowed to flourish in many back yards. There are also many who value blue passionflower for its fruit; there is a need for more of us to understand what a burden this species imposes on other species and on the ecosystem more broadly. An education campaign could be coupled with Council projects to eradicate the plant from public recreation lands to promote the spirit of collaboration.
Jeremy Taylor	18044	As this is readily confusable with other passionfruit plants, especially the flower as shown in this communication, the actual basis for identification needs to be communicated well. On that basis as well, the requirement to report sightings should be within five working days of the plant's *identification* rather than *sighting*.
Alison Couldrey	18514	Absolutely remove and require land owners/gardeners to destroy.
Phil Allan	18523	Ideal.
Paula Blair	18726	I think it is all very well proposing change to include the eradication of these species when you can't even control the basics, you spend all this money on planting lovely natives only to have them choked out by old man's beard. If you can't control this how on earth are you going to manage the rest. We can't keep leaving this all to the next generation to pick up.
Peter Williams	18857	Worth having a crack at it.
Myffie James	18962	I am all in for controlling as many of the pest weeds as possible, engaging with the local community and even having weed busting teams to support even more work being achieved.
Robert Schadewinkel	19194	Strongly support the proposed plan rules. To tackle an emerging pest is best practice in biosecurity - time is of essence and early action will save millions of dollars later.
Henry	19195	I strongly support this proposal. I work as a weeder at the Brook Sanctuary and do not wish to add any more voracious weeds to our repertoire.
Stephen Lavery	19213	Eradicate.
Peter Rigg	19216	Get rid of it. We have a number of climbing vines causing havoc like Old Man's Beard and we do not need another problem plant.
Trevor James	19264	While beautiful, it has to go.
Bruce Mutton	19335	I support the proposal.

Submitter's name	Sub. point ID	Summary of Submission
Jane Stevens	19369	I agree that blue passion flower should be included in the list of pest plants. It could become as difficult to control as Old Man's Beard if allowed to spread unchecked. Landowners who have it growing on their property will need information and support to identify it and get rid of it. NCC will need to step up pest control on the Grampians to make sure that council land isn't a continuing source of re-infection for neighbouring properties. I live in Bishopdale and I frequently find OMB seedlings growing in my garden, no doubt from uncontrolled plants on the Grampians, or other NCC land.
Mike Orchard	19451	Appropriate, the blue passion flower is definitely spreading in the areas identified and should be controlled for eradication.
Alison R Pickford	19461	Yes, get rid of it asap.
David	19484	I agree with the proposed plan, sounds sensible to eradicate while only in a small area.
Lisa Black	19491	Seems very sensible
Matt	19726	Sensible approach. Get it early.
Fiona Ede	19766	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.
Chris Ecroyd	19780	I think it is a good idea to try to eradicate this plant and will report any plants I see onto the iNaturalist website.
Robert	19805	Fully agree. Early intervention is the most cost/resource effective approach.
Brook Waimārama Sanctuary	19818	Support. Fully agree. Early intervention is the most cost/resource effective approach.
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports eradication for the whole region.
Project De-Vine Environmental Trust	Late	Support the change.

Submitter's name	Sub. point ID	Summary of Submission
4.3.2 Boneseed		
Alison Couldrey	18515	Remove/require land owners including gardeners to destroy. May need some advice and help to be offered/ given. Will need follow up.
Henry	19199	Strongly support
Trevor James	19265	We can eradicate this!
Bruce Mutton	19336	I support the proposal.
Jane Stevens	19370	I agree with this proposal. As you recognize in your summary, some of the areas where boneseed grows are difficult to access, whether they are on private or public land. Land owners will need information and support to identify this plant and try to control it on their properties.
Mike Orchard	19453	I disagree with partial control proposal. Boneseed support for steep cliffs could be substituted by other species. Likewise there is pampas on the steep cliffs - this is noticeably spreading too.
Joan Corry	19480	I support including boneseed in the plan so you can get rid of boneseed. because it is very invasive and has covered a lot of Wgtn hills (where I have lived) and could do the same here.
Matt	19728	Control in this area for Council alone seems tough due to dense population and steep terrain. Good approach.
Chris Ecroyd	19781	More widespread control of this plant should be considered. The Port Hills site is certainly a very good habitat for the species and hopefully it will not establish as well elsewhere.
Fiona Ede	19767	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.
Forest and Bird National Office	n/a	Forest & Bird would prefer eradication but supports sustained control of Boneseed on the Port Hills area, given the constraints the councils face, in order to achieve eradication elsewhere in the region.
Project De-Vine Environmental Trust	Late	Support the change.

Submitter's name	Sub. point ID	Summary of Submission
4.3.3 Moth plant		
Alison Couldrey	18516	Remove, require land owners including gardeners to destroy. May need some advice and help to be offered/ given. Will need follow up. Make it a notifiable pest plant.
Henry	19200	Strongly agree.
Trevor James	19266	I support eradication.
Bruce Mutton	19337	I support the proposal.
Jane Stevens	19386	I support the proposal to add moth plant to the list of pest plants. People living in areas where it is currently found, and adjacent areas, will need education and information if they are required to report sightings.
Mike Orchard	19454	Agree - proactive control of emerging pest plants is critical.
Matt	19729	Great approach. Get rid [the pest plant].
Sarah	19750	Agree
Fiona Ede	19768	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.
Chris Ecroyd	19782	This species is not common or well established in the region from what I have observed and it would be best to keep it out as far as possible. Any records I see will be put onto the iNaturalist website. So far, I think I have only seen it at one location and it was removed from that site.
Robert	19808	Agree
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports eradication for the whole region.
Brook Waimārama Sanctuary	n/a	Agree
Project De-Vine Environmental Trust	Late	Support the change.

Submitter's name	Sub. point ID	Summary of Submission
4.3.4 Pampas grass		
Alison Couldrey	18517	Require removal of all species. I noticed it in Westhaven recently.
Rod Barker	18997	There needs to be a region wide strategy and plan to eradicate pampas grass and other invasive weeds, and TDC needs to lead actions on this using a catchment by catchment approach.
Manu Danner	19098	Please include both pampas species in the whole region. It is popping up everywhere.
Sally Quickfall	19126	I would like to see the Rangihaeata headland and coastline between the headland and the Takaka River included as this is also an area that where pampas could be easily eradicated, with minimal ongoing work to keep it at bay.
Henry	19196	I strongly support this proposal. Pampas is a horribly invasive plant.
Sarah Douglas	19224	The areas of control could be widened by asking all landowners to eradicate it when it's on their property. I live in the Motueka Valley and have noticed the increase this year of this plant but it is only 4 between Alexander Bluff Bridge and Motueka so could easily be eradicated.
Trevor James	19267	We have to eradicate pampas and then try hard to keep this out of Mohua.
Bruce Mutton	19338	I support the proposal
Jane Stevens	19387	I support this proposal. Pampas is a very invasive plant and difficult to get rid of once established.
Erin Hawke	19460	Could you expand the control area to include Council owned road verges.?
Bruce Struthers	19477	If a plant is a pest, it is a pest everywhere in the District. Restriction of the sustained control area to a subset of the District has not been justified, and is a bit silly. Nor has an adequate distinction between native toetoe and the non-native species been provided on this web site. Is the photograph on the right of the clearly purple-tinged plant toetoe?  The District should take the high moral ground, and proactively eradicate pests on land that it owns or controls. I would recommend a field visit to the steep walkway joining 167 Stafford Drive (where your Ruby Bay pump station is) to the end of Korepo Road. Whatever the species may be, a large plant with long sharp leaves is growing over the poorly maintained walking path.
Matt	19730	Sensible approach given the remote location of some sites. Possibly challenging to enforce but NW Golden Bay holds high biodiversity values and this plant must be prevented from spreading.
Roger Frost	19763	Support.
Fiona Ede	19769	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.



Submitter's name	Sub. point ID	Summary of Submission
Chris Ecroyd	19783	I think an attempt should be made to control or eradicate these plants over a much wider area. They are increasing along the coast in the region and will cause problems in the future.
Robert	19819	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this.</p> <p>Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.</p>
Robert	19807	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this.</p> <p>Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.</p>
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports sustained control in the Aorere Valley area and Whanganui to Puponga area.
Brook Waimārama Sanctuary	n/a	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this. The BWST keeps pampas at zero densities within the leased Brook Conservation Reserve area but is surrounded by largely NCC administered land with rampant stands of pampas which is not controlled.</p> <p>Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.</p>
Project De-Vine Environmental Trust	Late	Support the change. SUPPORT THE CHANGE. Project De-Vine ET has maintained a policy of controlling Pampas plants in Golden Bay, when found at manageable infestation levels, before and since Pampas was withdrawn from the RPMP. We have been maintaining Pampas control in the Motupipi River and tributaries catchment areas down to the sea in particular to this level. This area has and still is receiving multi-group support for willow control, planting and RPMP plant species control. Because of Golden Bay's proximity to two National Parks (NPs) and multiple DOC reserves (see attached maps showing that 47% and 79% of all private land in Golden Bay is within 0.5km and 1 km respectively of DOC reserves or NPs) and QEII covenants, Project De-Vine ET would like to see both Pampas species made control plants for all Golden Bay apart from forestry or ex-forestry blocks. Maybe imposing a good neighbour rule around sites of high infestation would slow its spread?

Submitter's name	Sub. point ID	Summary of Submission
4.3.5 Water celery and Vietnamese parsley		
Alison Couldrey	18518	Require removal. Follow up to ensure it is happening.
Henry	19201	Strongly agree.
Bruce Mutton	19339	I support the proposal.
Jane Stevens	19389	I support this proposal to add Water Celery and Vietnamese parsley to the list of Pest Plants. At present, water celery can be bought at the local branch of Mitre 10, and possibly other garden centres. I think it would be a good start to contact all local garden centres, explain the risk this plant poses and ask them to remove all stock from sale immediately. I think it would be a good policy to discourage garden centres from stocking any plants that are potentially invasive.
Dave and Kate Prebble	19419	We live close to both Poorman's Stream and Orphanage Stream/Saxton Creek and have seen how these plants rapidly spread smothering other vegetation and clogging up the waterway. We support measures to control these plants.
Matt	19731	Good to prevent further invasive plants from getting into waterways.
Fiona Ede	19770	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.
Chris Ecroyd	19784	These plants are growing rapidly and completely blocking some streams in the region. The stream which runs from Hill St parallel to and just north east of Hart Road is now blocked with very dense growth, which could cause flooding when we do eventually get some heavy rain. There are now heavy crop of seed on the water celery in this area. They certainly need to be eradicated before they spread further.
Robert	19820	A new emerging aquatic pest plant. Fully agree with proposal. Fully agree. Early intervention is the most cost/resource effective approach.
Robert	19806	A new emerging aquatic pest plant. Fully agree with proposal. Fully agree. Early intervention is the most cost/resource effective approach.
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as named pests and supports sustained control in the absence of effective elimination methods.
Brook Waimārama Sanctuary	n/a	A new emerging aquatic pest plant. Fully agree with proposal.

Submitter's name		Sub. point ID	Summary of Submission
Project De-Vine Environmental Trust	Late		Support the change.
<b>Proposed amendments – pest animals</b>			
4.4.1 Feral and stray cats - general			
Jeremy Taylor	18046		Sounds like a good idea.
Val Pollard	18054		Awesome! When are you going to start trapping?
Val Pollard	19207		This is a fantastic initiative. I read through this several times, but I can't find mention of what is actually going to be done about the cats; presumably they are going to be cage-trapped and then returned to owner if chipped, or euthanized if not chipped, whether feral or stray? Will the traps also catch hedgehogs? It would be awesome if there was going to be a by-catch of another pest!
Peter Lucas	18121		As a volunteer involved in the trapping of predator animals in the Abel Tasman National Park, I support the proposal to manage feral and stray cats in the designated areas. I would also support and encourage the development of bylaws for the control of all cats in all areas because feral and stray cats in uncontrolled areas will continually re-infest controlled areas of high conservation value and because the owners of companion cats should be held responsible for the identification (e.g. microchipping) and control of their own animals to prevent then harming protected species.
Margot Haley	18547		Funding for the management for stray cats and dogs can be raised by a one-off registration fee for both cats and dogs and annual permits. See the benefits below and how everyone's cats and dogs can contribute financially to biodiversity funds and management plans. <a href="https://www.olg.nsw.gov.au/public/dogs-cats/nsw-pet-registry/microchipping-and-registration">https://www.olg.nsw.gov.au/public/dogs-cats/nsw-pet-registry/microchipping-and-registration</a>
D Lovett	18579		The proposal is a step forward but too limited. Releasing cat anywhere in the Nelson/Tasman area should be illegal. Similarly, action is need against all stray and feral cats if the problem is to be reduced and solved. Mandatory desexing of all cats except registered breeders is needed otherwise unwanted cats will continue to be released presenting an ongoing problem for everyone involved.
Gillian Pollock	18696		They should be neutered, registered and micro chipped. This is a start but cats know nothing of these things and will continue their wandering ways regardless. All other pet animals are fully controlled usually on the owner's property. Cats should be no different and must also be contained if we are to halt the decline in native species. Above all cats evolved as carnivores and are compelled to kill other animals.
Rod Barker	18998		Cat control measures must include all areas in the region, and they need to ensure that cats are kept under control at all times. There needs to be tighter controls on cat ownership, e.g. desexing, chipping, confined living spaces for cats so they cannot roam freely and attack native species.
Helen Spring	19061		I agree with the need to manage populations of feral and stray cats in the above-mentioned areas.

Submitter's name	Sub. point ID	Summary of Submission
Sally Quickfall	19128	I believe all feral cats should be destroyed as practicable, there is no place for them in our natural environment. Therefore, TDC and NCC should be looking at bylaws to ensure all domestic cats are microchipped to help with identification of cats that are trapped.
Henry	19197	I strongly support this proposal. Feral and stray cats have a severe impact on wildlife. Current control is lacking and thus we ought to implement tighter restrictions.
Nick	19205	I think the rules are good but need to go further and include desexing and microchipping domestic cats. Owners should be fined if their cats are found roaming the neighbourhood.
C Newcombe	19210	I think it is long overdue and needs to be done as soon as possible.
Margi Creed	19211	The most important thing is that the public is educated about the importance of keeping their cats indoors at least from early dusk till dawn whether they are desexed, microchipped or not. Please clarify rules for cat breeders. Are they allowed to keep un-desexed cats in an appropriate closed cage area and be registered as breeders.
Karen du Fresne	19214	I think that all cats, apart from those kept indoors, pose a significant risk to wildlife - especially birds, but also lizards, skinks, etc. I read recently with concern accounts in the Spinoff of NZ robin populations which had left Zealandia to breed in an adjoining area being totally wiped out by feral cats - adult birds and chicks. This grim toll was verified by monitoring cameras. If we want bird life to increase in our own vulnerable areas we have to do something about this. I agree with the proposals, but I'd like to know what the two councils propose to do when people report sightings of feral, stray or companion cats in the designated areas. Effective enforcement will be crucial. I also believe that these measures should be accompanied by a hard-hitting public education campaign - using monitoring cameras to prove that cats play a significant role in killing native birds, reptiles and even some vulnerable invertebrates.
Jane Jay	19217	It's a great starting point to reduce stray and feral cats within the district and beyond.
Kevin Bolitho	19220	I agree the stray and feral cats are a major issue for native species and control is imperative. This plan is a start but to me does not go far enough. I strongly urge a wider area be considered as high ecological value. It would be great to have some progress soon.
John Longden	19222	I support all the specific proposals, but would strongly support making these rules applicable throughout the whole of the district, both rural and urban. There is ample research on the ability of feral and domestic cats to travel long distances in a short time; attempting to raise the level of control in a small area surrounded by a vast pool of unmanaged cats is no more than tokenism.
Jeana	19226	It is inadequate. With all the research conducted showing the impact of feral cats the map of the area for targeting feral and stray cats needs to include the greater areas of Richmond and Nelson including the cities. For example, people have told me in the area above Jimmy Lee creek they have spotted feral cats. This is unacceptable and TDC/NCC needs to control those areas and reduce the cat populations. TDC/NCC have a responsibility to increase public awareness regarding the damage stray and feral can do as many in the general public are unaware of this. I would also like to know how the councils propose to manage feral cats. Finally, more needs to be done in terms of ensuring cats are desexed/microchipped. Who is monitoring this and the public need to know it is being monitored.

Submitter's name	Sub. point ID	Summary of Submission
Sonja Kamphuis	19229	I support all measures to control/eliminate feral cat populations. The harm stray and feral cats do to our wildlife and pet cats is unacceptable. We should be microchipping pet cats and educating owners on keeping them contained.
Elizabeth Tennet	19238	I strongly support the eradication of feral and stray cats. Our native birds and ground creatures will not survive whilst feral and stray cats are left to roam and multiply in our region. Personally, I conduct my own eradication of feral and stray cats on our property and the increased number of native birds, particularly bellbirds, have noticeably increased in number. I would also support a stronger measure to control the movement of domestic cats as they are native killers as well.
Karl Arndt	19245	We should be getting rid of all feral and stray cats everywhere and anywhere they are found.
Trevor James	19263	It is a good first step, but I would like to see greater controls: Rule applying everywhere against releasing cats into the wild. Rule requiring microchipping, starting in the most sensitive areas
Ralph Loughrey	19272	These proposals do not go far enough. All cats in Nelson and Tasman should be microchipped and registered.
Lucy Byrne	19278	I think all cats should be desexed and microchipped across New Zealand but this is a good start in the region. I live next to the Grampians in Bishopdale, Nelson and constantly see uncollared cats.
Joanna Santa Barbara	19281	I support TDC's suggested management plan for feral cats and encourage its extension into other areas.
Ray Zinsli	19284	This is a good start but I would prefer to see even stronger measures eg banning of all cats (even pets) in the future. In the meantime, requiring of pet cats to be enclosed in 'catios' for those who insist on keeping them in the short term. I presume feral and stray cats can be shot and poisoned, rather than live capture. I fear the intention might be to live trap and check for chip before euthanasia, and that would be very time and money expensive cf shooting/poisoning. Nationwide we need anti-pet cat publicity so well done. I hope hedgehogs, rodents and mustelids will also be under upscaled controls.
Roger Sanson	19287	As a domestic-cat owner I fully support implementation of the proposed controls. I'm of the view that unidentifiable cats captured within an urban area should be held for a brief period (say three day) and, if not claimed within that time, should be destroyed. Furthermore, that return to a claimant is strictly on condition of the animal being immediately neutered and micro-chipped. With respect to cats located in non-urban areas, non-chipped and presenting as feral, they should be immediately destroyed. I do not agree with neutering and returning to the wild.
John Hillock	19290	I do believe that the plans do not go far enough. Even in Australia, several states restrict cat ownership to those who have cats that are microchipped, de-sexed and restricted to indoors. Cats roam and their natural instinct is to kill birds and such as skinks, etc.. It is illogical to have restrictions on cat control only within a tiny proportion of the district. Why not make the restrictions district-wide? Just this week, we have had a flyer in our mailbox regarding 'Biscuit', a cat that has been missing since Christmas, who 'usually goes away for a few weeks now and then'. Biscuit is not microchipped and does not wear a collar. So, he is living off the land and that will not just be rabbits. My submission is that ALL cats in the area should be microchipped and de-sexed (unless the owner gains a breeder's licence-this licensing would need to be sorted) and indoors at

Submitter's name	Sub. point ID	Summary of Submission
		least at night. Maximum ownership of two cats, unless a licensed breeder. Roaming cats to be confirmed as predators to be controlled/eliminated. This is not unreasonable or onerous, surely? Our native bird population would increase exponentially!
Bruce Mutton	19333	I support the proposal.
Dave and Kate Prebble	19418	Feral/stray cats are responsible for the killing of many birds, also lizards. We feel they should be eradicated from all sites mentioned in this proposal.
Richard Furness	19449	<p>Feral and stray cats have a far greater impact on the environment than some of the pest plants mentioned. The suggested rule changes are a start but surely one should consider that feral cats and dumped companion cats travel very large distances in a day and thus some of the rules should be applied to the whole district not to just the defined areas. The rule I would make district wide in stage 1 would be " No person shall deliberately release into the wild (any place other than the persons garden) any companion or stray cat. Any person found to be doing this will be fined \$5000 for each cat".</p> <p>Why I say this is that just this week we have caught 4 young cats where somebody has dumped them in the countryside. Our present tally since the start of 2024 is 6 cats, one being properly feral. This has been a major issue over many years for the business I work with. These dumped cats would become feral in a very short space of time if they had not been caught and would be travelling all over Tasman. The Plan also gives no indication of the repercussions if someone is found to be releasing cats plus no indication of how we can report suspected persons of releasing the cats. Releasing cats in this way is cruel to the extreme. Now is the time to start taking some steps to overcome this cruelty to cats whilst protecting our wild animals and remaining sensitive to cat lovers (I classify cat lovers as those people who will chip and pay a license fee to have a cat and will not subject a cat to cruelty by releasing it in the wild).</p>
Ian Bilbrough	19455	I think it is a good start, but in the long term landowners need more. Keep it simple. We have bylaws for dog control then they should also apply to all cats ... using existing legislation will save many \$. We have a neighbour who blatantly ignores our frustration. I am of the opinion that education is a waste of time !
Mike Orchard	19456	I believe that stray and feral cats along with unmanaged domestic cats are decimating bird, reptile and insect biodiversity. International studies support this view. It is time for domestic cats to be desexed and microchipped as a minimum to drive owner accountability and determine how far they range. Feral cats are a major problem that is exacerbated by interbreeding with domestic pet cats/abandoned pets/actively hunting pet cats. Current processes for euthanizing captured cats are an obstacle that would be solved by microchipping. Desexing all cats that are free to roam would limit population growth.
Lesley Johnstone	19458	Not sure why you limit the issue to the mentioned areas. Should these rules not apply all over the Nelson/Tasman district? The more 'spotty' the coverage is the more confusing to the public. A blanket rule for the whole area would be a lot less confusing and help prevent these unsupervised cats from moving from one territory to another.
Michael Burton	19462	All cats not contained on their owners property are by definition, feral. The Brook Sanctuary halo has meant that birds I have never seen in my garden in Tahunanui are now being seen such as Kereru and Tui. I have worked hard planting natives on the Tahunanui hill side to attract these birds but sadly the birds attract lots of cats as well. I have seen my Neighbours "pet" cats with native birds in their mouths and my sensor lights are tripped several times a night by cats prowling through our place. There is no hope for our native fauna while cats are allowed to roam free,

Submitter's name	Sub. point ID	Summary of Submission
		completely unfettered by any sort of regulation for their owners. I have been told that if I live trap them and take them to the SPCA they will simply return them to their owners. Trapping of rodents and mustelids, while admirable, is a waste of time while we give open license to domestic cats, feral or otherwise they are all natural born killers. Compulsory cat containment and the elimination of strays and ferals is the only solution to give our native birds and reptiles a chance.
Adam Lumsden	19466	I believe there should be legally enforced de-sexing and microchipping of all companion cats. Cats should be required to be registered and have registration fees, the same as dogs. Cat ownership exclusion zones, or zones where properties must be 'cat proofed' to stop companion cats from leaving the property. These views have been concreted after working on a council led feral cat eradication program at two Nelson sites. One of them having over 20 cats caught within one month. Of the 20, three kittens and two young adults were taken in by the SPCA.
Elizabeth Bryant	19468	<p>Native birds are starting to spill out to Motueka from surrounding trapped areas - which is wonderful. However, "companion" cats are hunting them down. They also use the estuary track to access the seashore and can be seen returning home for breakfast. This killing of native birds is especially distressing when you have planted natives as we have been encouraged to do. Across the world cats are being enclosed. There are some amazing large enclosures available. Scientific Papers are available showing that cats do well in these cages. In Victoria you cannot legally let your cat trespass on other people's property. Surely, we do not want to become so far behind!</p> <p>I would like to ask that you make it mandatory to keep cats enclosed. Indeed, it would be good to at least start with owners when giving away kittens being responsible to give them only to people with such enclosures, cages, or electronic fencing, and also for it to be mandatory to keep you cat on your own property. No straying.</p>
Pamela Pope	19471	I agree that it is high time both councils took seriously, the problems being caused by feral, stray and companion cats at the top of the South Island, and the many areas under your watch. We are lucky enough to have Abel Tasman National Park and the Brook Waimarama sanctuary in our area, but if the councils don't come on board and make a better effort regarding cats, all the huge effort by volunteers and paid workers and millions of dollars could be wasted. Feral and stray cats (five impacts noted). It is high time there was formal control - micro chipped and spayed, to reduce unwanted kittens that get dumped or left to roam. We have got to do far better than this it should be illegal to catch, spay and release also, which is happening in some areas.
Neil Whittaker	19479	I support managing cats, we can have domestic cats and birds BUT only if we eradicate feral/stray cats and desex, microchip and put bells on domestic cats. We are losing our birdlife. Our native forests are deafening silent
Joan Corry	19482	Feral cats can kill birds and insects so we think it is a good idea to get rid of them if you can from high biodiversity areas.
Jane Stevens	19486	<p>I strongly agree with all the proposals for managing feral and stray cats, and would like to see even tighter controls on the management of companion cats, particularly in National Parks.</p> <p>I think that companion cats should be totally excluded from National Parks due to their habit of roaming over a wide area. Microchipping and desexing does not prevent a cat from predated wildlife. A domestic cat can live for 10-12 years, which can result in the destruction of 100s, if not 1000s of dead birds, reptiles and insects over one cat's lifetime.</p>

Submitter's name	Sub. point ID	Summary of Submission
		Living in a National Park should be viewed as a privilege which comes with responsibilities to the wildlife that the park was set up to protect. I hope both TDC and NCC will encourage central government to issue national guidelines for cat management rather than it being left to local authorities to deal with it in an ad hoc way.
Sue Lindsay	19506	I think feral cats need to be actively eliminated in all areas, not just those mentioned in the plan. Not only are they a terrible predator on our native birds and invertebrates, but they also carry and transmit toxoplasmosis, which is increasingly causing major stock losses for local farmers.
Shaun Akinson	19604	Good stuff, however compelling people to report sightings is probably unenforceable and likely to upset the locals. A strong emphasis on education and visits by council staff, eg holiday periods (perhaps by the Harbour Master for ATNP,) would be more productive.
Graham Wright	19666	I support the proposed rules.
John Hutton	19703	<p>It seems to me that the proposed 'new' restrictions/limitations are too limited. Having lived on West Bank Road for more than a decade and seeing all the feral cats there, as well as now living at Mahana Ridge, where feral cats and, indeed, uncontrolled domestic cats are causing predation on a range of species, I believe there should be more limits on the 'free ranging' of cats.</p> <p>I would hope that in time more people would contact council and express their concerns, as I suppose that would be necessary before future planning takes into account the damage done by feral and free-ranging domestic cats to our local wildlife. There seems to be no responsibility taken by many domestic cat owners who let their cats out at night to freely roam the environment, hunting and killing whatever they choose to kill that night. Surely, some kind of public education campaign would help educate these cat owners on the dangers they pose.</p> <p>Anyway, for now, i just wanted to let you know that I think the 'new' limitations are far too limited and narrow in their application and I hope for a wider control response in the future.</p>
Forest and Bird Golden Bay branch	19722	<p><i>A copy of the full Forest &amp; Bird submission is attached - Appendix 1.</i></p> <p>FERAL CATS: Feral cats are a serious predator of ground nesting birds. In Nikki McArthur's report "A Review of Management Issues and Options for Coastal Birds in the Tasman District" commissioned by Tasman District Council he states "feral cats are ubiquitous in coastal habitats in the Tasman District. This being the case, we consider it highly likely that ground nesting coastal birds in the Tasman District will be experiencing high feral cat depredation rates to those observed in similar habitats elsewhere in the country.</p> <p>We are asking for feral cats to be included in the Plan in Golden Bay with the following rules:</p> <ol style="list-style-type: none"> <li>1. Feral cats can be kill trapped at the seven shorebird sites in Golden Bay – Taupata, Pakawau, Collingwood, the Parawhakaoho, Onahau and Rototai/Motupipi.</li> </ol>



Submitter's name	Sub. point ID	Summary of Submission
		<p>2. Night shooting to be allowed on only four sites – Taupata, the Parawhakaoho, the Onahau Sandspit and Rototai/Motupipi on the Rototai Sandspit, the Rototai Shellbank and on the accreted land between the Motupipi Estuary and Pohara Beach. These sites are all well away from any residential properties.</p> <p>3. Residents to be notified seven days prior to undertaking either kill trapping or night shooting. Dates advertised in the Public Notices section of the Golden Bay Weekly, on the Golden Bay Community Noticeboard Facebook page and through leaflet drops to residents requesting people keep their cats indoors between sunset and sunrise.</p>
The Ornithological Society of New Zealand – Tasman-Nelson region	19748	<p>We note that: 'Both Councils wish to step up feral and stray cat management at sites with important biodiversity values and further promote responsible companion cat ownership overall'. The Draft Plan states: 'Feral and stray cats ..... also carry parasites and toxoplasmosis, which causes abortions in sheep and illness in humans'. We would draw attention to the fact that toxoplasmosis can also affect native avifauna, including kererū (<i>Hemiphaga novaseelandiae</i>), kākā (<i>Nestor meridionalis</i>) and kiwi species (<i>Apteryx spp.</i>)</p> <p>As such, disease risks from feral and stray cats should be considered together with predation impacts on native avifauna. The proposed expansion of site-led programmes to include both feral and stray cats in Tasman and Nelson should not only reduce predation pressure on avifauna, but also potentially limit the occurrence of <i>Toxoplasma gondii</i> in the environment.</p>
Matt	19725	Strongly support this option, and any proposed cat management bylaw options.
Will Parkyn	19735	Doesn't go far enough and should include the whole region. Let's look for a plan to eradicate all predators from the district.
Sky Davies - Tasman Environmental Trust	19747	TET supports measures to limit the presence of cats in important wildlife areas. I would also like to add the Farmers for Whio areas in the Moueka Catchment to this plan. This includes subcatchments that border Kahurangi National park including Baton, Pearse, Graham, and Pokororo rivers. There is extensive trapping of stoats and ferrets in these areas to create safe habitat for whio. I am aware of some stray cat colonies and would like these to be controlled and for the number of companion cats to also be limited.
Allen Berthelsen	19825	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>
Cam Carter	19824	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>
Anna Berthelsen	19823	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>

Submitter's name	Sub. point ID	Summary of Submission
Robert	19821	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. - I am not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc. it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>
Robert	19809	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. - I am not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc. it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>
Chris Ecroyd	19785	<p>The proposal does not go far enough. It is annoying to have a garden with native skinks and birds present and to observe the predation by cats from the neighbouring properties. Cats should not be allowed to freely roam the area.</p>
Fiona Ede	19771	<p>I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.</p>
Roger Frost	19764	<p>Support (and would like to see extended to anywhere within 100m of DOC estate or any Conservation zoned land).</p>

Submitter's name	Sub. point ID	Summary of Submission
		In relation to St Arnaud the rule: "No person shall deliberately release into the wild (e.g. Nelson Lakes National Park and environs) any companion cat from or living within the mapped area." seems possibly a little unclear. As I read it it seems to imply that it is not an offence to release a companion cat into the wild if it is from or living OUTSIDE the mapped area. Is this intended?
Richard Mangin	19789	As a rural resident we have noticed feral and stray cats becoming more prevalent and having a severe effect on our bird and skink populations. We feel that the council's control program should have a much broader focus, in identifying and controlling population hotspots and introducing mandatory micro-chipping and desexing of companion cats.
John Reeves	19755	<p>Myself and Jane Reeves strongly support the efforts to contain the impact of feral and stray cats. The carnage to native species is well documented and therefore the councils should be congratulated for taking the lead on this matter.</p> <p>The reason I support control at all the above sites is due obviously to their sensitive biodiversity, but also because I visit those places regularly. I spent a significant portion of my spare time on community pest control activities; possums, stoats, rats and mice. I note that cats are particularly hard to catch so good luck.</p>
SPCA National Support Office	n/a	<p><i>(As per the submission summary provided by the submitter – see Appendix 1 for full submission)</i></p> <p>SPCA acknowledges there are times when controlling the populations of non-native wild animals is necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of the targeted species.</p> <p>SPCA commends the inclusion of cat categories distinguishing between companion, stray, and feral cats in the partial review of the Tasman-Nelson Regional Pest Management Plan.</p> <p>SPCA urges both councils to promote and support the microchipping and registering of microchips on the Companion Animal Register of all companion cats in Nelson and Tasman.</p> <p>SPCA acknowledges the efforts of many people who support the lives of individual stray cats and those living in colonies.</p> <p>SPCA acknowledges that managed, targeted Trap-Neuter-Return (mtTNR) can be an important longer-term management tool for stray cats. SPCA does not support trap-neuter-return programmes in areas where cats pose a significant risk to native wildlife.</p> <p>Animal control should be conducted as part of an integrated pest management programme that includes human behaviour change, assessment of harms to animals intentionally and unintentionally targeted, and monitoring of efforts. Lethal management methods should only be used when there is no effective non-lethal, humane alternative.</p> <p>SPCA advocates that the Tasman-Nelson Regional Pest Management Plan include education and training for humanely reducing and eradicating targeted species.</p> <p>SPCA opposes the use of poisons, leghold traps, and snares to kill or capture animals due to the severe welfare harms animals experience from the use of these methods of management.</p> <p>SPCA is concerned about traps that rely on a noose-like mechanism to kill an animal that poses a strangulation hazard to the trapped animal. SPCA advocates for more research on this topic to determine if the mechanism of death is acceptable based on welfare harms.</p>

Submitter's name	Sub. point ID	Summary of Submission
Forest and Bird - National Office	n/a	<p><i>A copy of the full submission is attached - Appendix 1.</i></p> <p>Forest &amp; Bird welcomes the increase of sites for management of feral and stray cats. Forest &amp; Bird understands that TDC and NCC will be consulting on a cat bylaw and we also welcome this and see it as an important first step toward more responsible cat ownership and toward fulfilling objectives in the regional biodiversity strategies (Nelson Biodiversity Strategy, Tasman BioStrategy, Kotahitanga Mō Te Taiao Strategy).</p> <p>Forest &amp; Bird would like to see the following feral and stray cat rules apply across the whole region, rather than just at named sites.</p> <ol style="list-style-type: none"> <li>1. No person shall feed or shelter any feral or stray cat.</li> <li>2. No person shall deliberately release into the wild any companion or stray cat.</li> </ol> <p>Alternatively, these provisions should be included in a cat bylaw along with compulsory registration, desexing and microchipping.</p>
Brook Waimārama Sanctuary	n/a	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. – We are not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc. it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>
4.4.1 Feral and stray cats – Nelson City sites		
Alistair Kwan	17984	<p>"It seems merely symbolic to make rules about cats in high-value sites (note the necessity of a hyphen in ""high-value"" without making supporting rules for adjacent neighbourhoods. Consider the residential area of the Brook Valley, for example, between two high-value sites. It takes mere seconds for a cat to enter the Grampians reserve from a property backing onto the Grampians reserve. Even a human can do it. The proposal mentions difficulties in keeping cats at home but these appear to be merely received opinion, irrelevant to the need to do so. Many cats are kept at home, and many are kept indoors-only or with semi-outdoors runs (e.g. ""catios""); there is nothing impossible about it. Perhaps a</p>

Submitter's name	Sub. point ID	Summary of Submission
		buffer zone needs to be defined - based on research-established cat roaming ranges - in which cats must be more strictly contained, and must be neutered.
Alison Couldrey	18520	Nelson city/reserves - allow trapping of cats by volunteer pest control groups. I'd be happy to see kill traps for them, because live trapping would be problematic getting the caught animal to SPCA/vet for microchip ID. Country wide, cats should be microchipped and be required to be kept on owners property at all times.
Elise Doyer	19047	These rules need to be much wider and include the whole Nelson City area with responsibility placed on cat owners to microchip and desex their cats as well as keep them on their own properties at least for the hours from dusk to dawn.
Bryce Buckland	19086	The proposal to control and manage stray and feral cats is well due and most people, including cat owners, recognise the ecological damage they do but most will deny that action to reduce these animals should be taken. There is no shortage of Cats and responsibility for their m must be taken. I would like to see the area for control of all Cats extended outside the maps as shown as Cats know no boundaries. I would also like to see that new subdivisions like the proposed one for Maitai Valley should be declared a 'no cat area'. For the last 15 years I have been involved with the Conservation project on Grampians Reserve and have trapped over 1,100 Possums. Most of these are eaten out by Cats. We do no Cat control now but are aware it needs to be undertaken as it's common to see newly dumped Cats on Grampians. These pests have a serious effect on the Native Birdlife (EG: Fantails) we are trying to save. Because of the toxic, extreme and uncompromising nature of many Cat lovers we would like the legal right to take action on these animals. At St Arnaud many Cats get dumped or are bred to be Feral and for several years a local was collecting Cats from SPCA and releasing them at St Arnaud. Now locals trap hundreds of Cats and up until recently it was common to shoot around 120 Cats each year Locals now have a "Cat year". The map should also include Valleys such as Rainbow Valley and around both Lakes and also North of Nelson to the Wangamoas and South passed Wakefield, to Upper Moutere Village. The proposal must be given all the possible powers to succeed otherwise it will fail, Cat owners will persuade authorities to go soft and Cat status will be left to pest controllers who may act outside the legislation.
Steven Gray	19131	I think the high-value sites should include all reserves in Nelson City. When we have deployed trail cameras within the Centre of New Zealand Botanical Hill Reserve, we always detect cats during those monitoring exercises. Whether or not they have domestic ties, they are either feral or strays. We should be able to trap them like rats, possums, stoats, and hedgehogs. They are doing more damage to birdlife than all other pests combined.
Lesley Kuykendall	19279	The Nelson City sites need to require desexing and microchipping of cats as in the St Arnaud proposal. I agree that feral cats need to be controlled in all of the sites. How effective will the reporting requirement be? Once a cat is reported, what will the follow-up be? Are certain staff going to be given this job as a priority? Is there a place for trapping feral cats in some areas like Abel Tasman National Park?
Steven Gray	19673	1. Birdlife Centre of NZ is a community trapping group formed in 2011 to increase wildlife, especially birds, in the Botanical Hill Reserve, a "high ecological value site". More than 25 volunteers are responsible for servicing almost 300 traps, targeting possums, rats, mustelids, mice and hedgehogs, as part of NCC's Halo Project. Since April 2019, we have trapped over 100 possums, 1400 rats, 16 mustelids, 2250 mice and 50 hedgehogs. In addition, we have more than 25 'backyard' trappers, in the vicinity of the Reserve, who have caught more than 400 pests (mostly rats), over the last three years.

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		<p>2. We have trail camera footage (day and night) and anecdotal evidence (eg, observations by Kūmānu employees and members of the public) showing the presence of feral, stray and domestic cats in various parts of the Reserve. Cats, including domestic cats, have a justified reputation as predators of birds, insects and reptiles.</p> <p>3. We believe there should be controls on all cats to protect wildlife (especially indigenous species) and prevent the spread of disease. Accordingly, we support moves to require cats to be microchipped and registered; the mandatory de-sexing of cats (except for registered breeders); and a limit to the number of cats per household.</p> <p>4. As part of the RPMP we propose NCC begin a trapping campaign targeting feral and stray cats in “high ecological value sites”, including the Botanical Hill Reserve, following a public education programme.</p>
DOC	n/a	<p><b>(Abridged). A copy of the full submission is attached - Appendix 1.</b></p> <p>Support in principle with amendments:</p> <p><b>Amend</b> pest agent cat rule (b) for the St Arnaud environs site-led programme as follows:  <i>No person shall deliberately release into the wild (e.g. i.e. Nelson Lakes National Park and environs) any companion or stray cat <del>from or living within the mapped area.</del></i></p> <p><b>Consider</b> making the pest agent rule as modified above a region-wide rule.</p> <p><b>Amend</b> the rule for Abel Tasman National Park private enclaves to include the following pest agent rules:</p> <p>a. No person shall keep, hold or harbour any companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.</p> <p>b. No person shall deliberately release into the wild (i.e. Abel Tasman National Park and environs) any</p>

Submitter's name	Sub. point ID	Summary of Submission
		<p>companion or stray cat.</p> <p><b>Clarify</b> the criteria used for identifying 'high value sites' in Nelson City and re-assess how these have been applied to ensure that sites included within the programme are justified and satisfy cost-benefit requirements.</p> <p><b>Clarify</b> whether other areas have been assessed against the criteria for 'high value sites'.</p> <p><b>Clarify</b> the process for adding additional areas to the RPMP if/when they are assessed to be 'high value sites'.</p>
Forest and Bird - National Office	n/a	Forest & Bird support the inclusion of all the named sites in the consultation.
4.4.1 Feral and stray cats – Tasman District sites		
Alison Couldrey	18520	Sites on margin of Abel Tasman NP should ban cats and instigate kill trapping regime. St Arnaud - try and ban new 'companion' cats. Require all such cats to be retained on property. Use kill traps for stray/feral cats.
Cynthia McConville	19680	I am writing in support of the Forest and Bird submission on the TNRPMP. Specifically the inclusion of .... [edits made] feral cats in Golden Bay ..... in the revised plan. I have seen the impact these animals have on our coastal shorebirds and seabirds at sites where they roost and nest along our coastline.
Patrick Steer	19742	I strongly support the control of feral and stray cats. I would like to see council take more action to support our coastal bird population through greater pest control. Specifically include the coastal area between Motupipi, Takaka and Onahau Rivers in Golden Bay - this is an internationally important area for coastal birds that has no protection from multiple plant and animal pests.
Robert Kennedy	19700	I think that the sites in Golden Bay, as detailed in the submission by the Golden Bay branch of the Forest & Bird Society, should be included as places where cats should be eliminated by kill-trapping or shooting. I do not see any point in micro-chipping cats so that they can be returned to owners, and allowed to return to predating birds.
Waimea Inlet Forum working group	19803	<p>The Waimea Inlet Forum supports the proposed partial review of the Regional Pest Management Plan. Our comments are about the proposed changes relating to feral cats.</p> <p>We note that the Battle for the Banded Rail programme run through the Tasman Environmental Trust currently has 1,153 traps for ferrets, stoats, weasels and rats (ship and Norway) set along 58km of traplines around the Inlet, including in the areas covered by the Regional Pest Management Plan's site-led programme for Waimea Estuary.</p>

Submitter's name	Sub. point ID	Summary of Submission
		<p>Since 2016 The Tasman Environmental Trust has also run a Live and Let Live feral cat control programme around key habitat areas on the Inlet. (Figure 1: Network of traps from Mapua to the Honest Lawyer)</p> <p>We would like to see the area covered by the Plan's existing site-led programme for Feral cats, Brushtail possums, Ferrets, Stoats, Weasels and Rats (ship and Norway) at Waimea Estuary (Pearl Creek and Dominion Stream areas) increased, by extending two of the existing mapped areas and adding a sixth area.</p> <ul style="list-style-type: none"> <li>• We ask that you extend the Matahura area to also include a) Dominion Flats on both sides of SH60 Te Mamaku Drive and b) Higgs Reserve.</li> <li>• We ask that you extend the Research Orchard Road area further to the west.</li> <li>• We ask that you add a new area, covering all of Bell Island and extending further east of it to include all of the Bell Island shellbank.</li> </ul> <p>(Figure 2: Requested increase in area for Waimea Estuary site-led programme)</p> <p>The purpose of this increase is to support the habitat restoration work that has been undertaken at Dominion Flats and Higgs Reserve and at Research Orchard Road, and to provide a better level of protection for the significant native habitat that is the Bell Island shellbank.</p> <p>We trust that you will give consideration to making this amendment.</p> <p>For the Waimea Inlet Forum working group.</p> <p>P.S. We are also e-mailing this feedback, including the two Figures, to <a href="mailto:biosecurity@tasman.govt.nz">biosecurity@tasman.govt.nz</a></p>
Forest and Bird - National Office	n/a	<p>Additional sites: Forest &amp; Bird would like to see the following Golden Bay sites included as named sites:</p> <p>Forest &amp; Bird Golden Bay's E Toru Ngā Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers Project as an identified site within the RPMP. This area is home to internationally significant populations of breeding shorebirds<sup>1</sup> and is under active management, led by Forest &amp; Bird's Golden Bay branch, with support from the local community, Manawhenua Ki Mohua, and the Department of Conservation Takaka District Office.</p> <p>Puponga and environs, to support conservation efforts at Puponga Farm Park and Onetahua (Farewell Spit).</p> <p>Port Tarohe and environs to support penguin conservation</p>
Project De-Vine Environmental Trust	Late	<p>Support the change. We appreciate the support towards our feral cat programme in our East Mohua Trapping Collective in Golden Bay and hope the RPMP will spur other landowners onto wanting to control the feral cats visiting their properties.</p>



Submitter's name	Sub. point ID	Summary of Submission
Sabella		
Henry	19202	Strongly support
Bruce Lines	19285	<p>While I understand the rationale. My Experience suggests that owners if burdened with added costs to meet the LoF restrictions will attempt to comply at minimum cost. As such what can happen is vessel owners may take their vessel somewhere discrete and clean it themselves in an uncontrolled manner.</p> <p>Perhaps extending the time to 2,3,4? days' time frame in -Rule a. ' is also not intended to apply to those craft that are usually moored in the Tasman-Nelson region and leave the region for no more than 24 hours before returning.? may help reduce risk without being too hard on vessel owners.</p> <p>Allowing owners to dispose of the Sabella is very risky, and ease/access to information' (such as how to) needs to be considered.</p> <p>It may also be useful to allow a professional and experienced marine biosecurity diver to make inspections as an option. Simply because the travel lift can at times not be available.</p>
Bruce Mutton	19340	I support the proposal.
Matt	19732	Good approach. Important to have consistency across TOTS when it comes to pests.
Dave Taylor	19752	Aquaculture New Zealand supports the continuation of the 'Eradication' status for Sabella ( <i>Sabella spallanzanii</i> ) under the proposed Tasman-Nelson RPMP. Sabella has potential to cause significant operational impacts to aquaculture in the Top of the South if it were to establish. The aquaculture industry is working closely with councils under the Top of the South Marine Biosecurity Partnership to ensure establishment does not occur, and we appreciate the need for a coordinated approach to control measures. We, therefore, also support the proposed amendments to the RPMP to align them with those of Marlborough and enable consistency and powers in response to non-compliance.
Fiona Ede	19772	<p>I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum.</p> <p>The group endorses the proposed RPMP rules as they are written.</p>
Forest and Bird - National Office	n/a	Forest & Bird supports eradication over the whole region and the rules proposed in the consultation document to prevent Sabella becoming established in the region.
Project De-Vine Environmental Trust	Late	Support the change.

Submitter's name	Sub. point ID	Summary of Submission
<b>Pest conifers and wilding conifers</b>		
Pest and wilding conifers - general comments		
Manu Danner	19099	Let's get onto it!
Henry	19198	I am strongly for wilding conifer control. The macrocarpa is an additional conifer that has the potential for becoming invasive.
Nick	19206	Great rule change - I'm hoping it includes Te Mamaku Drive [Ruby Bay] too - the forestry owner needs to keep on top of spreading wilding pines
Chip Felton	19218	I'm very much in favour of the proposed changes as we need to do much more to combat the negative effects of introduced plant species, including of course introduced conifers. I personally would favour complete cessation of any new introduced conifer plantings anywhere in NZ.
Neroli Amyes	19219	A very difficult problem to solve; needs much community cooperation to get onto any spread early when wilding seedlings are still small enough to deal with.
John Longden	19223	I fully support the proposal in its entirety. I have seen and worked in wilding infestations in both Islands, and from sea level to above the bushline. Wildings threaten huge areas of the country. The threat from fire danger is of concern. but the greatest threat is the conversion of scrubland to sterile pine forest, and the invasion and effective destruction of tussocklands and alpine meadows by the hardier conifers such as lodgepole.
Elizabeth Tennet	19239	I support the control of pest and wilding pines. They pose a fire risk and are a blot on the environmental landscape.
Ralph Loughrey	19274	I agree with the proposal but it should cover the whole of the Nelson and Tasman districts.
Lesley Kuykendall	19280	The proposals look comprehensive. It will depend on staff being available to follow-up on complaints and the cooperation of participants to achieve a good outcome. If someone refuses to comply with required action, how effective will the enforcement be? It is not helpful to have litigation go to the courts.
Joanna Santa Barbara	19282	I support TDC's management plan.
Roger Sanson	19288	One has only to drive through areas such as Central Otago to see the massive problem arising through years of failure to control the spread of wilding pines. I find it deeply disturbing to note the reduction in funding to those govt departments and other organisations charged with eradication and control of spread to new areas when funding regimes to date have proven inadequate to get on top of the challenge. I support all regulations, enforcements, and other measures aimed at gaining control of this invasive problem.
Bruce Mutton	19334	I support the proposal. I suggest extending the affected areas significantly.

Submitter's name	Sub. point ID	Summary of Submission
Jane Stevens	19391	I agree with all effective measures that can be put in place to control the spread of wilding conifers. I include the word 'effective' as these plants spread into inaccessible areas, so a management plan needs to describe how inspections will be made and how to ensure any required action is taken.
Richard Furness	19450	I would support the changes, even though it has been established that wilding pines can occur from trees kilometres away.
Mike Orchard	19457	It's great that radiata and Douglas fir will be listed wilding conifers. This is a significant improvement and must be defended from compromise. Pinus radiata and Douglas Fir are aggressive colonisers along with the known pest conifers listed. Biodiversity is at risk - particularly in the ultramafic and alpine areas of Richmond FP but also privately owned adjacent land areas, and any disturbed land. It is great to see plantation/land owners needing to maintain buffers but wind carried seed spread from Douglas fir and other wilding pines is quite long distance. The buffer of 200m is pretty limited but understandable given current lack of any controls. The land "deemed valuable" seems too loose without criteria. In the future I suggest eDNA could be used to prove spread from a particular site or plantation. Cleared area rule very clear - strongly supported.
Elizabeth Bryant	19467	I am impressed with this plan and thoroughly endorse it. However, I would like to put forward a suggestion for you to consider. Pine slash is causing pain and economic hardship to both councils and individuals. With the recent court case against pollution up north - using an old English law - it may be that pine slash polluting the rivers may be prosecutable. In any case it is past time that forest harvesters are made responsible for this pollution. I am asking that they are made responsible for this polluting slash.
Bruce Struthers	19478	<p>My comments are on the summary on this web page.</p> <p>I hope the full proposal adequately addresses these issues:</p> <ol style="list-style-type: none"> <li>1. You have not clearly defined "adverse impacts on regional values". What are those regional values? What are the adverse impacts? Why were these species selected?</li> <li>2. Your diagrams refer to "high value sites" but do not indicate what values are used for measurement, and what thresholds determine "high value".</li> <li>3. You have not justified the selection of the proposed controlled areas. If a plant is a pest anywhere, it is likely to be a pest everywhere it is not controlled.</li> <li>4. You have not advised or required actions to be taken to remove debris and slash from the cleared area. Unmanaged slash has already caused significant impact to District coastlines after rain events.</li> <li>5. You have not advised or required a desirable course of action to restore a site once a plant has been removed. If a landowner clears a site without replanting, the risk of slips and damage to downhill sections is amplified. Compliance by a landowner may result in future liability, both to the landowner and the District, if damage does occur.</li> <li>6. Compliance will impose a cost on a landowner who made a good faith decision to purchase land based on regulations in existence at the time. Imposition of compliance is effectively both a new tax on land ownership, and a new burden on all ratepayers to fund the District's expanded enforcement staff.</li> </ol>

Submitter's name	Sub. point ID	Summary of Submission
		7. Your summary, and regrettably my submission, are not expressed in Plain English. If you are not content with the volume and quality of submissions you receive, you may consider eliminating the "consultant speak" and jargon from the summary and proposal.
Joan Corry	19481	I support including wilding pines in the pest management plan, because they are a pest and it would be good to contain or get rid of them. For 20 years my husband manually pulled out seedlings of Pinus contorta on Mt Ruapehu/Tongariro National Park and they are still re-appearing. Need to contain them to stop them spreading – it is ongoing.
One Forty One, PF Olsen and Tasman Pine Forests	19706	<p><b>A copy of the full forestry companies submission is attached at Appendix 1.</b></p> <p>Description and effects. We object to the description. It is emotive, and the matters are expressed in absolute terms and not based on fact in this region. This description is a cut and paste from national documents. There is no assessment of the issues for this region. There is no evidence that such conifers adversely impact recreation in the region. There is no evidence showing soil and soil fauna have been adversely altered in this region, that pastoral farming availability has been reduced, that water availability has been impacted and that such conifers create wildfire risks over and above any other vegetation in the region.</p> <p>In the Sapere Report (2022), with regard to availability of water, this region does not include a hydro catchment that may be impacted. There has been no assessment of the wildfire risk in this region and the same report advises that wildfires fuelled by wilding conifers are rare and require further research.</p> <p><b>Relief sought</b> Delete the description or rewrite to take into account known regional impacts.</p>
One Forty One, PF Olsen and Tasman Pine Forests	19707	<p>Rule a. We object to this and the uncertainty provided by the definition of "clear land". Reasons for objection is: - the Review Proposal in foot note 9 page 41 admits that "low" or "very low density" and "susceptible areas" are not defined, not mapped and that more work is required to be undertaken. This lack of defining means that the impact of the rule on any occupier is uncertain and cost benefits cannot be calculated.</p> <p>As non-compliance with rules can lead to prosecutions under the Biosecurity Act 1993 the extent of the application of a rule must be certain and not one which allows an authorised person to have the discretion to decide what is a susceptible area.</p> <p>The second to last sentence in the explanation of rule a. appears to indicate that the concept of susceptible areas could be any land, such as, production land. It is not clear what can be considered as production land as the New Zealand Planning Standards define rural production as including land not just for agriculture but for forestry.</p> <p><b>Relief sought</b> The rule is deleted and reconsidered when the relevant work on the definition is undertaken, and any susceptible area is mapped.</p>
One Forty One, PF Olsen	19708	Rule b. We object to this rule, explanation and process. Reasons for objection include:

Submitter's name	Sub. point ID	Summary of Submission
and Tasman Pine Forests		<p>The rule makes a forest owner liable for legacy trees, trees that for whatever reason adjacent landowners have chosen over the years not to destroy. The rule would capture trees of any age and trees that may have eventuated from wildings that a landowner has chosen not to deal with. So, any existing wilding within the Dept of Conservation estate, within State and Council Road corridors would be captured by this rule.</p> <p>Retrospective application for liability for wildings is unreasonable. Forest owners have had no legislative ability to control how adjacent landowners have managed any wildings on their property.</p> <p>There is no definition of what a “valid” complaint would be. The information and data requirements of what would be valid have not been included.</p> <p>The explanation is confusing as to the date/age of the trees that fall within the scope of this rule. Is the forest owner liable for any wilding spread that occurs from 1 July 2024? The explanation only confuses the application of this rule.</p> <p>The four-step proposal dealing with legacy trees is unreasonable in that it is heavily in favour of any complainant. The adjacent landowner does not have to reach any agreement as they know that if no agreement is reached then the forest owner is liable. The process can lead to unreasonable behaviour. This is an unfair process and if the right of appeal cannot be included then there should be provision for an arbitrator to assist in the development of an agreement and ability for unreasonable demands to be discounted. The rule should not apply to trees existing at 1 July 2024.</p>
One Forty One, PF Olsen and Tasman Pine Forests	19709	<p>Rules d and e. We object to the inaccurate mapping under these rules. Although we do not disagree with the rule, it is subject to mapping quality. The mapping we have seen to date is of a low standard and incorporates some plantation forest owners’ productive crop. If the rule is enforced based on poor mapping it could illogically require forest owners to remove significant amounts of tree crop on their land or force the forest owner and Management Agency to negotiate an agreement.</p> <p><b>Relief sought</b></p> <p>Over the duration of the Regional Pest Management Plan, with regard to the operational areas under current management set out in these rules that have been mapped in agreement with affected landowners (as shown in Maps 4.1, 4.2 and 4.31 and 4.32 in the Review Proposal) and prior to cone bearing.</p>
One Forty One, PF Olsen and Tasman Pine Forests	19710	<p>Alternate options. The proposed rules have not considered the changes in the regulation of forest owners with regard to the spread of wilding conifers. We object to the statement that the rules are necessary because government policy is encouraging an increase in afforestation in the region.</p> <p>While government policy provides for tree owners to enter into the ETS programme the tinkering with this programme, the excessive costs for being with the project (\$30/ha/per year) belie any concept that government policy is leading to more afforestation in the Region.</p>

Submitter's name	Sub. point ID	Summary of Submission
		<p>The national planting figures for the region indicate that that there has, in the last five years, been very little increase to plantation forests in the region.</p> <p>The NES-PF and now NES-CF has major controls on consideration of the spread of wilding conifers. Regulation 11 requires an assessment using the wilding risk calculator of any conifer to be planted. The calculation must be made 8 months in advance of planting and provided to you, the councils. Under regulation 79(a) wilding risk calculations must be undertaken for any replanting and completed no more than 8 months prior to the replant.</p> <p>If a score exceeds a wilding tree risk calculator of 12 or more one cannot replant as a permitted activity, instead, one must apply for a resource consent. Under the 2023 changes to the NES-CF, afforestation and replanting management plans must also be undertaken and provided to the Council on request. We know of no afforestation or replanting of Douglas fir in the region since the introduction of the NES-PF in 2018.</p> <p>While this Review Proposal is undertaken under the Biosecurity Act 1993, we consider that the impact of the NES-CF on the risk management of the spread of conifers is applicable.</p>
One Forty One, PF Olsen and Tasman Pine Forests	19711	<p>Cost benefit analysis. With regard to Rule b there has been no cost benefit analysis undertaken for this region. The Sapere Report (2022) was undertaken regarding removal of existing infestations and included infestations of all conifers, not ones related to Douglas Fir and Pinus radiata. It is a national report and the Councils have not taken its costings and assessed it against the regions' characteristics and Rule b. The Sapere report assists in supporting Rule a. The Sapere Report identified impacts on specially identified cultural sites. There has not been any identification of such sites under risk in this region. While irrigation is undertaken in the regions there has been no assessment of the risk of availability of water from existing infestations. The Sapere Report identifies the benefits of added further priority areas for control, but the Review Proposal and the cost benefit analysis does not advise of any such areas in the region. Accordingly, we cannot properly assess the relevance of the Sapere Report costs and benefits to this region and in particular the applicability of Rule b to assisting in the controlling of existing infestations.</p>
Matt	19733	<p>Strongly support including pest and wilding conifers in the plan. These trees are creating a significant environmental and economic impact across the country including erosion and reduction in biodiversity. Active control is needed to encourage better land use from landowners and forestry companies alike.</p>
PJ Kenney	19746	<p>The system seems to be working pretty well as is. Problem "Operational Areas" are being identified and dealt with. The new catchment area groups have money, volunteers and enthusiasm to help identify, report, and deal with incursions. Forestry companies, small growers association (NZFFA), consultants, forest managers, Te Uru Rakau, TDC and wood suppliers all seem to communicate very well when necessary and are generally aware of prospective problem areas.</p> <p>Eric Appleton notes Scion has stated if the current ban on genetic engineering were amended they could produce a sterile Douglas fir in 12 months. The current government has stated it will amend the law. There have been ideologies via political posturing and populist anti-pine sentiment that has confused issues but the general cooperative direction is positive. These changes may be throwing bureaucracy onto a problem that is solving itself and may cause divisiveness and disagreements in the future.</p>

Submitter's name	Sub. point ID	Summary of Submission
		<p>More specifically:</p> <p>1/ In your rationale for inclusion of new rules, "neighbouring land occupiers should not be required to pay for or undertake pest control on their land through the actions or inactions of other parties". This implies someone else is responsible and should pay for eradication. This could lead to excessive over the fence responsibilities and disagreements. We have had more dramatic consequences with other noxious plants with no such draconian action.</p> <p>2/ In your proposed rules for outside "Operational Areas" a. "Occupiers of land that is clear or relatively clear of pest or wilding conifer must destroy any pest or wilding conifer on their land ...". This final judgement is left to some "authorised person", however, both radiata and Douglas fir are very valuable to farmers and small landowners in woodlots and shelter belts smaller than 1ha. There is now a promotional program around the country by NZFFA and Te Uru Rakau promoting alternative species and there should be a genetical modified sterile Douglas fir very soon.</p> <p>b. "Occupiers of planted conifer forests greater than 1ha ..... are liable for the costs for the removal of any wilding conifers on adjoining land within 200m of the planted forest property boundary.". This allows for undue responsibility on the plantation owner now and into the future as further development and/or land use philosophies collide. This is a severe disincentive to afforestation. These boundary discussions usually work out a local compromise and the threat of "going to law" seldom helps the situation.</p>
Roger Frost	19765	Strongly support and hope it can be extended in due course. Should there also be a restriction on planting fertile plants of these species within a defined distance of the specified areas (and subsequently all DOC or Conservation zoned land)?
Fiona Ede	19774	<p>I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum.</p> <p>The group endorses the proposed RPMP rules as they are written.</p>
Tākaka Hill Biodiversity Group Trust	19775	<p><b>Summary only. See Appendix 1 for full submission</b></p> <p>The feedback provided by the Tākaka Hill Biodiversity Group Trust (THBGT) on the Tasman Nelson RPMP Partial Review Proposal highlights several key points. Including ten conifer species in the pest conifer control program is a positive step towards sustainable control and preservation of native ecosystems. The Trust emphasises the importance of proactive measures and specific management strategies in safeguarding the environment for future generations.</p> <p>However, concerns are raised regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on occupiers, and the need for clear transitional criteria. The Trust advocates for clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual occupiers.</p> <p>Suggestions are also made for implementing an incentive-based approach to motivate occupiers to act in controlling wilding conifers, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations. The Trust underscores the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding conifers.</p>

Submitter's name	Sub. point ID	Summary of Submission
		<p>Overall, the Trust's feedback emphasises the need for a collaborative and well-defined approach to effectively manage pest and wilding conifers, protect biodiversity, and address the challenges faced by land occupiers in the Tākaka Hill area and the region.</p> <p>Our feedback provides specific references to page numbers and headings in the T_NRPM Partial Review Document for clarification.</p>
Chris Ecroyd	19786	<p>It should go much further. Pinus contorta and Douglas fir are the two species we should be most concerned about. Pinus contorta should be eradicated. It is not important as a commercial crop tree, produces cones from a very young age and the seed is windblown long distances. First priority should be to eliminate it from sites such as ridge tops where the seed is very readily blown long distances.</p> <p>New plantings of Douglas fir should be of selected provenances or strains which produce less seed and planting on ridge tops discouraged.</p>
Michael North	19813	<p>I support these proposals for wilding conifer management. This is by far the most important part of this partial review, and the suggested rules are robust and will go a long way toward containment of wilding spread. They are entirely consistent with the polluter pays principle, which is sound. Wildings present an immense threat regionally and nationally to ecosystems, landscapes and productive land and this requires a strong response, which is met by these proposed rules.</p> <p>A) Clear Land Rule</p> <p>This is an important inclusion to retain existing landscapes relatively free of wildings. I see some issues with wording- Does 'clear or relatively clear' pertain to a particular point in time? If not, then how is TDC to know if a property that becomes worse than 'relatively clear', was not clear or relatively so at the time of these rules being implemented? – but which has deteriorated unchecked since that time, and so escapes this rule as it has become somewhat infested.</p> <p>How will 'relatively clear' be defined?</p> <p>The rule diagram for this rule is ambiguous as it refers to the area being a 'high value site' - high value for what? The phrase does not occur at all in the initial written rule definition, but crops up later in the Explanation of Rules, in the context of biodiversity. It is not helpful having such Explanations at the end of the text, rather than accompanying the earlier written rules themselves, as it means (in this case) that the definition is split into two separate sections of text.</p> <p>The initial definition of 'clear land' includes it being 'highly susceptible to wilding conifer spread'. How will this be decided? What is the threshold? Further, a site only moderately susceptible to infestation would evade this rule. Under the Explanation of the Rules an area need only be 'vulnerable' to wilding spread which is inconsistent with the earlier definition.</p> <p>Does the clear land rule and its interpretation pertain to an individual title, or to a neighbourhood or locality or landscape? I assume the former, but I don't think this is explicitly stated.</p> <p>B) Planted Conifer Forest Rule</p> <p>This is the most significant inclusion in this proposal, as plantations are the primary original source of most wildings, broadly speaking.</p> <p>How will this rule relate to legacy wilding infestations that date to well before the current owner's adjoining tenure? To be fair, it would be a big ask to expect a forest owner to mop up extensive mature wilding forests just outside their boundary that clearly derived long ago from plantations</p>



Submitter's name	Sub. point ID	Summary of Submission
		<p>on their current title. It may be that such a scenario outside of the existing management zones does not exist, in which case, my comment here is probably irrelevant.</p> <p>C) Pest Agent Rule This is an important inclusion as it covers smaller areas of forest not included under B. The remedy of source tree removal seems only fair in such a scenario.</p> <p>D) Maintain the Gains Rule This is critical to keep managed areas clear into the future, but how and by whom will it be monitored? Is a complaint required to trigger this rule, or will it be triggered by monitoring? How will a new purchaser of a property within one of the management zones know about their wilding conifer responsibilities? Will it appear on a LIM?</p> <p>E) Good Neighbour Rule Presumably a complaint is required to trigger this rule, but this is not stated. This rule seems fair and reasonable.</p>
Robert	19822	Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.
Robert	19810	Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.
DOC	n/a	<p>(Abridged). <i>A copy of the full submission is attached - Appendix 1.</i></p> <p>Support rules a, b, c, and e:</p> <p>In relation to rule a, commit to mapping or otherwise defining criteria for identifying areas that are 'highly susceptible to wilding conifer spread', within 12 months of the RPMP amendments being adopted, and make this information available on the Councils' websites.</p> <p>Support in principle rule d:</p> <p>In relation to rule d, clarify the 'agreed level of work' and 'agreed control targets' used to facilitate transition from nationally/regionally funded control programmes to individual land managers.</p>
Forest and Bird - National Office	n/a	Forest & Bird support progressive containment of wilding conifers, the conifer species in the pest conifer and wilding conifer control programmes, and the suggested rules around landowner responsibilities.

Submitter's name	Sub. point ID	Summary of Submission
		Requirements for forest owners to manage wilding conifers 200m into neighbouring properties is sensible and fair.
Brook Waimārama Sanctuary	n/a	Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.
Jo Ritchie (Wilding Pine Network – WPN)	19826	<p><b>Abridged. See Appendix 1 for full submission</b></p> <p>1. We share THBT's concerns "regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on landowners, and the need for clear transitional criteria". We support advocating for "clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual land occupiers.</p> <p>2. We support THBT's suggestion for an "incentive-based approach to motivate land occupiers to act in controlling wilding pines, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations". The carrot before the stick approach is central to both securing and sustaining widespread community support but also to effectively educate and inform both the community and landowners of the risk that wilding pines and conifers present to biodiversity, productive and natural landscapes, and hydro-generation. The recently released Environment Canterbury Wilding Pine Control Handbook Wilding pine control handbook   Environment Canterbury (ecan.govt.nz) is a very good example of this approach.</p> <p>3. THBT also emphasises the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding pines.</p> <p>We support this statement because it is important a) to have the 'stick' when the 'carrot' fails and b) because to get stakeholders on board they need to be fully informed and supported throughout the life cycle of wilding management which often requires repeat visits to achieve effective control.</p> <p>WPN would also like to make 2 additional comments:</p> <p>I. We support the inclusion of a wider list of pine species that can become wildings if left unmanaged. We also support maintaining the gains of prior investment in control work and the introduction of the two new rules in the RPMP amendment but suggest that these need to go further. Limiting exacerbators to those with already planted forests is a reactive approach. Effective long-term management is also about being proactive and dealing with known sources of issues before they occur. This is particularly important with species where seed is wind spread.</p> <p>II. Common language is important in national programmes to get buy in from all stakeholders. We respectfully suggest that some of the key terms in the RPMP used to describe and categorise species that can become wildings will cause confusion.</p> <p>We recommend that the RPMP amendment should mirror the widely accepted terms used in the MPI led National Wilding Conifer Control Programme. For instance, Table 5 separates Douglas fir and radiata pine out from the other wilding pine and conifer species listed in the table as pest conifers – individual species.</p> <p>Pest conifers should be renamed wilding conifers, and all species should be listed together. A simple table can then identify those that are valuable shelter and commercial timber species, those not planted anymore e.g. Pinus contorta and those that pose the greatest risk and why.</p>

Submitter's name		Sub. point ID	Summary of Submission
			Additionally, the statement under wilding conifers 'naturally occurring, not planted even with the qualifier of 'wildings of the species' is ambiguous – neither Douglas fir or Radiata pine occur naturally they are all a result of intentional planting or wilding spread.
Laurien Heijs		19827	I support the Regional Pest Management Plan review and inclusion of all species proposed.
Project De-Vine Environmental Trust		Late	Support the change. We appreciate the support towards our feral cat programme in our East Mohua Trapping Collective in Golden Bay and hope the RPMP will spur other landowners onto wanting to control the feral cats visiting their properties.
Pest and wilding conifers – Mt Richmond Management Unit			
Julie McIntock		19221	Good. Need to make sure rules are obeyed and if not prosecution must happen
Trevor James		19268	Totally support more strict rules on this. I think option c is best. Option c should be applied to Silver Birch in St Arnaud as well, given its major adverse effect on surrounding wetlands.
Pest and wilding conifers – Takaka Hill			
			(no specific submissions on this matter – refer to the Tākaka Hill Biodiversity Group Trust which is in the generic submissions on pest and wilding conifers)
Pest and wilding conifers – Abel Tasman National Park			
			(no specific submissions on this matter)
<b>Section 5 comments</b>			
			(no specific submissions on this matter)

## **Appendix 1: Full submissions received**

The following submissions were received separately from the online submission process and are attached in their entirety so as to not lose the integrity of the submission and supporting comments made:

1. OneFortyOne, PF Olsen and Tasman Pine Forests – joint submission
2. Forest and Bird – National Office
3. Forest and Bird – Golden Bay Branch
4. Department of Conservation
5. Brook Waimārama Sanctuary (BWS)
6. The RSPCA
7. Pamela Pope
8. Tākaka Hill Biodiversity Group Trust (THBGT)
9. Wilding Pine Network
10. Project De-Vine Environmental Trust (late submission)



## **JOINT SUBMISSION on behalf of OneFortyOne New Zealand Ltd, PF Olsen Ltd and Tasman Pine Forests Ltd**

This submission concerns the Tasman-Nelson Regional Pest Management Plan (RPMP) 2019-2029 Review Proposal (“Review Proposal”). The submission covers the following matters:

### **Specific Provisions**

- Description of effects of pest and wilding conifers
- Rule a and definition of clear land
- Rule b
- Rule c
- Rules d and e
- Alternate options
- Cost benefit analysis

### **DESCRIPTION OF EFFECTS OF PEST AND WILDING CONIFERS (P. 41)**

1. We object to this description.

#### **Reasons for objection**

2. The description is emotive, and the matters are expressed in absolute terms and not based on fact in this region. This description is a cut and paste from national documents. There is no assessment of the issues for this region. There is no evidence that such conifers adversely impact recreation in the region. There is no evidence showing soil and soil fauna have been adversely altered in this region, that pastoral farming availability has been reduced, that water availability has been impacted and that such conifers create wildfire risks over and above any other vegetation in the region.
3. In the Sapere Report (2022), with regard to availability of water, this region does not include a hydro catchment that may be impacted. There has been no assessment of the wildfire risk in this region and the same report advises that wildfires fuelled by wilding conifers are rare and require further research.

#### **Relief**

4. Delete the description or rewrite to take into account known regional impacts.

### **RULE A (P. 41) AND EXPLANATION (P. 43)**

5. We object to this and the uncertainty provided by the definition of “clear land”.

#### **Reasons for objection**

6. The Review Proposal in foot note 9 page 41 admits that “low” or “very low density” and “susceptible areas” are not defined, not mapped and that more work is required to be undertaken. This lack of definition means that the impact of the rule on any occupier is uncertain and cost benefits cannot be calculated.
7. As non-compliance with rules can lead to prosecutions under the Biosecurity Act 1993 the extend of the application of a rule must be certain and not one which allows an authorised person to have the discretion to decide what is a susceptible area.

8. The second to last sentence in the explanation of rule a appears to indicate that the concept of susceptible areas could be any land, such as, production land. It is not clear what can be considered as production land as the New Zealand Planning standards define rural production as including land not just for agriculture but for forestry.

#### **Relief**

9. The rule is deleted and reconsidered when the relevant work on the definition is undertaken, and any susceptible area is mapped.

#### **RULE B AND EXPLANATION AND PROCESS**

10. We object to this rule, explanation and process.

#### **Reasons for objection**

11. The rule makes a forest owner liable for legacy trees, trees that for whatever reason adjacent landowners have chosen over the years not to destroy. The rule would capture trees of any age and trees that may have eventuated from wildings that a landowner has chosen not to deal with. So, any existing wilding within the Dept of Conservation estate, within State and Council Road corridors would be captured by this rule.
12. Retrospective application for liability for wildings is unreasonable. Forest owners have had no legislative ability to control how adjacent landowners have managed any wildings on their property.
13. There is no definition of what a “valid” complaint would be. The information and data requirements of what would be valid have not been included.
14. The explanation is confusing as to the date/age of the trees that fall within the scope of this rule. Is the forest owner liable for any wilding spread that occurs from 1 July 2024? The explanation only confuses the application of this rule.
15. The four-step proposal dealing with legacy trees is unreasonable in that it is heavily in favour of any complainant. The adjacent landowner does not have to reach any agreement as they know that if no agreement is reached then the forest owner is liable. The process can lead to unreasonable behaviour. This is an unfair process and if the right of appeal cannot be included then there should be provision for an arbitrator to assist in the development of an agreement and ability for unreasonable demands to be discounted.
16. The rule should not apply to trees existing at 1 July 2024.

#### **RULES D AND E MAPPING**

17. We object to the inaccurate mapping under these rules.

#### **Reason for objection**

18. Although we do not disagree with the rule, it is subject to mapping quality. The mapping we have seen to date is of a low standard and incorporates some plantation forest owners’ productive crop. If the rule is enforced based on poor mapping it could illogically require forest owners to remove significant amounts of tree crop on their land or force the forest owner and Management Agency to negotiate an agreement.

#### **Relief**

19. Over the duration of the Regional Pest Management Plan, with regard to the operational areas under current management set out in these rules that have been mapped in agreement with affected landowners (as shown in Maps 4.1, 4.2 and 4.31 and 4.32 in the Review Proposal) and prior to cone bearing.

**ALTERNATE OPTIONS**

20. The proposed rules have not considered the changes in the regulation of forest owners with regard to the spread of wilding conifers. We object to the statement that the rules are necessary because government policy is encouraging an increase in afforestation in the region.
21. While government policy provides for tree owners to enter into the ETS programme the tinkering with this programme, the excessive costs for being with the project (\$30/ha/per year) belie any concept that government policy is leading to more afforestation in the Region.
22. The national planting figures for the region indicate that that there has, in the last five years, been very little increase to plantation forests in the region.
23. The NES-PF and now NES-CF has major controls on consideration of the spread of wilding conifers. Regulation 11 requires an assessment using the wilding risk calculator of any conifer to be planted. The calculation must be made 8 months in advance of planting and provided to you, the councils. Under regulation 79(a) wilding risk calculations must be undertaken for any replanting and completed no more than 8 months prior to the replant.
24. If a score exceeds a wilding tree risk calculator of 12 or more one cannot replant as a permitted activity, instead one must apply for a resource consent. Under the 2023 changes to the NES-CF, afforestation and replanting management plans must also be undertaken and provided to the Council on request. We know of no afforestation or replanting of Douglas fir in the region since the introduction of the NES-PF in 2018.
25. While this Review Proposal is undertaken under the *Biosecurity Act 1993* we consider that the impact of the NES-CF on the risk management of the spread of conifers is applicable.

**COST BENEFIT ANALYSIS**

26. With regard to Rule b there has been no cost benefit analysis undertaken for this region. The Sapere Report (2022) was undertaken regarding removal of existing infestations and included infestations of all conifers, not ones related to Douglas Fir and *Pinus radiata*. It is a national report and the Councils have not taken its costings and assessed it against the regions' characteristics and Rule b. The Sapere report assists in supporting Rule a. The Sapere Report identified impacts on specially identified cultural sites. There has not been any identification of such sites under risk in this region. While irrigation is undertaken in the regions there has been no assessment of the risk of availability of water from existing infestations. The Sapere Report identifies the benefits of added further priority areas for control, but the Review Proposal and the cost benefit analysis does not advise of any such areas in the region. Accordingly, we cannot properly assess the relevance of the Sapere Report costs and benefits to this region and in particular the applicability of Rule b to assisting in the controlling of existing infestations.

27. We do wish to be heard at the hearing.

**Dated:** 20 March 2024



Jo Field  
Environment Manager  
**OneFortyOne New Zealand Ltd**



Sam Nuske  
Regional Manager – Nelson  
**PF Olsen Ltd**



Dan Montgomery  
Technical & Environmental Forester  
**Tasman Pine Forests Ltd**



# Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

## Submission on Tasman-Nelson RPMP 2019 - 2029 Review Proposal

**To** Tasman District Council  
**Attn** Biosecurity Team  
**From** **Royal Forest & Bird Protection Society of New Zealand Inc. (Forest & Bird)**  
PO Box 631  
Wellington

**Contact** **Scott Burnett** **Gillian Pollock**  
Te Tauihu Conservation Manager Nelson-Tasman Branch Secretary  
PO Box 899, Nelson 7040 g.pollock@scorch.co.nz  
021 294 2416  
s.burnett@forestandbird.org.nz

**Date** **11 March 2023**



## **Introduction to Forest & Bird**

### **New Zealand's largest and oldest conservation organisation**

The Royal Forest & Bird Protection Society (Forest & Bird) is New Zealand's largest and longest-serving independent conservation organization with over 100,000 members, supporters and volunteers. Our mission is to be a voice for nature – on land, in the sea, and in our fresh waters.

Forest & Bird's constitutional purpose is to *"take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand."*

### **Independent and funded primarily by members and supporters**

We are a registered charity, with our funding coming primarily from members and supporters; we receive government grants only for specific practical projects. Our nearly 50 volunteer branches throughout New Zealand work on the ground to restore nature through activities such as running pest control programmes, native plant nurseries, field trips, and public talks.

### **Hundreds of projects**

With hundreds of projects operating at a variety of geographic scales, our portfolio of conservation projects is the largest of any single NGO in New Zealand. Through our Kiwi Conservation Club | Hakuturi Toa (KCC), we engage children and their families, inspiring them to enjoy, understand, and love the natural environment and to care for it. We have more than 5000 children in KCC, and many ex-KCC members have gone on to establish science and conservation careers.

### **An advocate for nature**

Forest & Bird advocates for policy development and law reform, and represents nature in the Environment Court, at Environmental Protection Authority boards of inquiry, and in council planning processes. A century after establishment, we are still working just as hard for the protection and restoration of our wildlife and wild places on land, in freshwater, and at sea.

## Submission on Tasman-Nelson RPMP 2019 - 2029 Review Proposal

Forest & Bird welcome this partial review of the Tasman-Nelson RPMP and are broadly supportive of the amendments proposed.

### **Pest Plants**

#### **Blue Passion Flower**

Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports *eradication* for the whole region.

#### **Boneseed (Nelson Port Hills only)**

Forest & Bird would prefer eradication but supports *sustained control* of Boneseed on the Port Hills area, given the constraints the councils face, in order to achieve eradication elsewhere in the region.

#### **Moth Plant**

Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports *eradication* for the whole region.

#### **Pampas (Golden Bay specific sites only)**

Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports *sustained control* in the Aorere Valley area and Whanganui to Puhanga area.

#### **Vietnamese Parsley and Water Celery**

Forest & Bird supports inclusion in the Tasman-Nelson RPMP as named pests and supports *sustained control* in the absence of effective elimination methods.

#### **Feral and stray cats**

Forest & Bird welcomes the increase of sites for management of feral and stray cats. Forest & Bird understands that TDC and NCC will be consulting on a cat bylaw and we also welcome this and see it as an important first step toward more responsible cat ownership and toward fulfilling objectives in the regional biodiversity strategies (Nelson Biodiversity Strategy, Tasman BioStrategy, Kotahitanga Mō Te Taiao Strategy).

Forest & Bird would like to see the following feral and stray cat rules apply across the whole region, rather than just at named sites.

1. No person shall feed or shelter any feral or stray cat.
2. No person shall deliberately release into the wild any companion or stray cat.

Alternatively, these provisions should be included in a cat bylaw along with compulsory registration, desexing and microchipping.

## Sites

Forest & Bird support the inclusion of all the named sites in the consultation.

Additional sites: Forest & Bird would like to see the following Golden Bay sites included as named sites:

Forest & Bird Golden Bay's E Toru Ngā Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers Project as an identified site within the RPMP. This area is home to internationally significant populations of breeding shorebirds<sup>1</sup> and is under active management, led by Forest & Bird's Golden Bay branch, with support from the local community, Manawhenua Ki Mohua, and the Department of Conservation Takaka District Office.

Puponga and environs, to support conservation efforts at Puponga Farm Park and Onetahua (Farewell Spit).

Port Tarohe and environs to support penguin conservation.

## Sabella

Forest & Bird supports *eradication* over the whole region and the rules proposed in the consultation document to prevent Sabella becoming established in the region.

## Conifers – pest conifers and wilding conifers

Forest & Bird support *progressive containment* of wilding conifers, the conifer species in the pest conifer and wilding conifer control programmes, and the suggested rules around landowner responsibilities.

Requirements for forest owners to manage wilding conifers 200m into neighbouring properties is sensible and fair.

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<sup>1</sup> McArthur, et al. (2022). A Baseline Survey of the Indigenous Bird Values of the Tasman District Coastline. Report for Tasman District Council. Retrieved from:  
<https://www.tasman.govt.nz/document/serve/A%20baseline%20survey%20of%20the%20indigenous%20bird%20values%20of%20the%20Tasman%20District%20coastline%20FINAL%20DRAFT%202022.pdf?DocID=33551>

FOREST AND BIRD  
GOLDEN BAY BRANCH  
SUBMISSION ON THE TASMAN NELSON REGIONAL PEST MANAGEMENT PLAN



FERAL CAT AT BANDED DOTTEREL NEST EATING EGGS

Forest and Bird  
Golden Bay branch

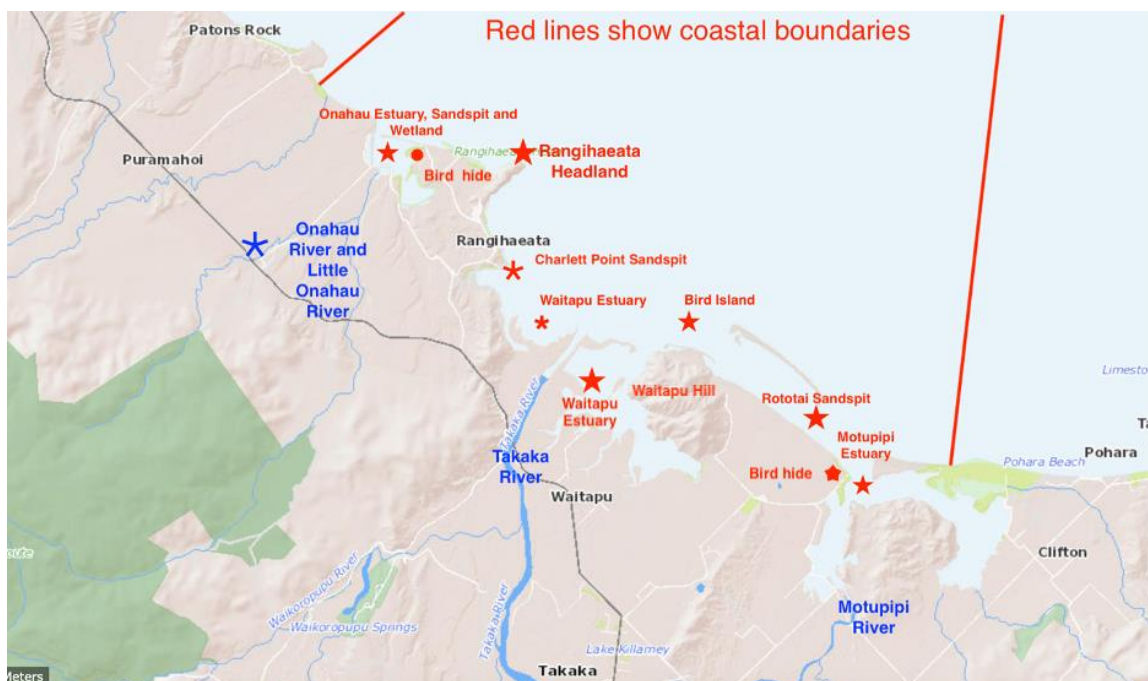
[forestandbird.goldenbay@gmail.com](mailto:forestandbird.goldenbay@gmail.com)

28 March 2024

Thank you for the opportunity to submit on the Tasman Nelson Regional Pest Management Plan. Current animal and pest plant management undertaken by Forest and Bird in Golden Bay focuses on the coastal environment. Our priority is to provide protection and suitable habitat for our ground nesting and roosting shorebirds and seabirds.

E TORU NGA AWA: KO TAKAKA, KO MOTUPIPI, KO ONAHAU – The Three Rivers. The Golden Bay coastline has high biodiversity values. It is home to thousands of international migratory shorebirds, national migratory shorebirds and seabirds and resident shorebirds and seabirds that forage, roost and nest here. Their conservation status ranges from nationally critical to threatened and at risk.

#### MAP OF E TORU NGA AWA: KO TAKAKA, KO MOTUPIPI, KO ONAHAU – THE THREE RIVERS PROJECT



The Tasman Nelson Pest Management Plan has no identified sites in its Site-led programme in Golden Bay. We are asking Council to include E Toru Nga Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers project area in the Plan as part of its Site-led pests programme. Our Three Rivers project is supported in principal by Manawhenua Ki Mohua, the Department of Conservation and Tasman District Council. One specific purpose of the Tasman Nelson Regional Pest Management Plan is to protect the relationship between Maori and their taonga and to protect taonga species from the adverse effects of pests. The stated outcome of a site identified as site-led in the Plan is ***to exclude or eradicate from that place or to contain, reduce or control within that place the pests that are capable of causing damage to a site and its values.*** The recent Nikki McArthur report commissioned by Tasman District Council - “A Baseline Survey of the Indigenous Bird Values of the Tasman District Coastline” highlights the importance of this site, its international values for international migratory species, national migratory species and resident species.

Stoats, rats, weasels, hedgehogs and cats prey on beach nesting shorebirds and seabirds, on adult birds, their eggs and their chicks. Beach nesting birds are extremely vulnerable to predation. An effectively resourced and managed trapping system will reduce predation incidents. Forest and Bird oversee around one hundred DOC 200 traps placed along the coastline of the Three Rivers project between the Patons Rock Headland and the Rototai Reserve. These traps are managed by a combination of Forest and Bird volunteers, the community group Predator Free Rangihaeata and coastal residents living on Tangmere Road Rototai. Project Devine are currently setting up a trapping system on the lower section of the Three Rivers project on the accreted land adjacent to the Takaka Golf Course bounding the Motupipi Estuary and Pohara beach.

We are asking Council to include two additional animal species in their list of animal pests in the Tasman Nelson Regional Pest Management Plan – the European hedgehog (*Erinaceus europaeus*) and the European Brown Hare (*Lepus copenus europaeus*).

EUROPEAN HEDGEHOG: Nikki McArthur’s “Review of Management Issues and Options for Coastal Birds in the Tasman District” commissioned by Tasman District Council identifies hedgehogs as a serious predator of ground nesting birds with high rates of nest losses recorded in bird populations nesting in the coastal environment. For example, trail camera monitoring of Tuturiwhatu (Banded dotterel) nests along the Eastbourne – Wainuiomata coastline between 2011 and 2021 has established that hedgehogs are currently the most serious threat limiting Tuturiwhatu (Banded dotterel) hatching success along this stretch of coastline. Between 2011 and 2013 ten out of fifteen Tuturiwhatu (Banded dotterel) nests (67%) filmed at Lake Kohangapiripiri and Baring Head were preyed upon by mammalian predators. Nine out of ten of these predated nests (90%) were preyed upon by hedgehogs. Trail camera footage filmed at these nests indicated that hedgehogs were highly effective at locating Tuturiwhatu (Banded dotterel) nests with individual hedgehogs being responsible for multiple nest failures.

The primary method used to control hedgehogs is kill trapping, DOC 200s. These traps have been passed by the National Animal Welfare Advisory Committee (NAWAC) standards for humane kill traps on hedgehogs. Dried rabbit meat is the lure used in trapping operations to target hedgehogs.

EUROPEAN BROWN HARE: Footage from our trail camera mounted on the Rototai Sandspit showed multiple disturbances by hares to incubating Torea (Variable oystercatchers) at night. Hares can directly impact ground nesting coastal birds by disturbing and trampling nests. Hare footprints are common on all of the shorebird and seabird nesting sites within E Toru Nga Awa: Ko Takaka, Ko Motupipi, Ko Onahau -The Three Rivers, the Rototai Sandspit, the Rototai Shellbank and the Onahau Sandspit. Although we had no trail cameras mounted on the nests of Tuturiwhatu (Banded dotterel) it is quite likely that hares also directly impacted the nests of Tuturiwhatu (Banded dotterel) on the Rototai Sandspit and the Rototai Shellbank.

Hares are nocturnal. Reluctant to accept baits, the most effective method of control is night shooting. Night shooting of hares must be undertaken at regular intervals to ensure numbers are kept low.

**FERAL CATS:** Feral cats are a serious predator of ground nesting birds. In Nikki McArthur’s report “A Review of Management Issues and Options for Coastal Birds in the Tasman District” commissioned by Tasman District Council he states *“feral cats are ubiquitous in coastal habitats in the Tasman District. This being the case, we consider it highly likely that ground nesting coastal birds in the Tasman District will be experiencing high feral cat depredation rates to those observed in similar habitats elsewhere in the country. Both solitary (Variable oystercatcher and Banded dotterel) and colony ground nesting birds (Caspian tern, White-fronted tern, Red-billed gull and Black-billed gull) are likely to be equally at risk of depredation by feral cats. Nest camera monitoring of Banded dotterel at Pencarrow Head in Wellington saw 10% of nests preyed upon by feral cats. In the Waitaki Basin feral cats were responsible for 43% of 77 lethal events recorded at Banded dotterel nests. Forest and Bird have film of nest predation by feral cats at two sites on the Golden Bay coastline where trail cameras were mounted. These two cameras were trained on individual nests belonging to one pair of Variable oystercatchers and one pair of Banded dotterels.*

Management options for feral cats recommended by Nikki Mc Arthur in his report are kill trapping, live trapping, poisoning and hunting. Forest and Bird have a preference for using two of the suggested options kill trapping and night shooting (details below). Night shooting can be particularly effective at removing neophobic or trap-shy animals and can usefully complement a kill-trapping operation. Night shooting of feral cats can also be coordinated with the targeting of European brown hares. Of the remaining two options live trapping and poisoning, live trapping is labour intensive requiring daily checking of traps and poisoning has the potential to harm ground feeders, native weka, pukeko and introduced species such as thrush and blackbirds.

**KILL TRAPPING:** Kill trapping is the most commonly used method to control feral cats in New Zealand. Four types of kill traps have been tested and passed the National Animal Welfare Advisory Committee (NAWAC) standards for use on feral cats (DOC, 2021), namely:

- Steve Allen conibear traps set in raised wooden cubbies
- Steve Allen conibear traps set under plastic Philproof covers
- Belisle Super-X 220 traps set in a submarine tunnel
- Timms trap set on a raised platform with access ramp

Cat trapping operations sometimes use a variety of kill traps rather than relying on one single design to counteract any avoidance of a particular design by individual cats. Kill traps targeting cats are most often baited with whole or minced rabbit meat, cat pet food, fish or fish oil. The conibear and Belisle style traps require the cat to push or pull the trap trigger while reaching for the bait, while the Timms trap needs the cat to pull on the bait itself to activate the trap. Current DOC best practice for cat trapping recommends that kill traps be positioned 100 - 200 m apart in areas of high cat density.

**HUNTING:** Night shooting using spotlights or thermal imaging scopes is regularly used to control feral cats at key sites or at key times of the year. Night shooting using a spotlight has been used to reduce densities of feral cats on Ōnoke Spit in Palliser Bay to protect nesting Pohowera / Banded Dotterels and Taranui / Caspian Terns (*Hydroprogne caspia*) (McArthur 2020), and night shooting using thermal imaging scopes has been used at Pencarrow Head to protect nesting Pohowera / Banded Dotterels (McArthur et al. 2021).

We are asking for feral cats to be included in the Plan in Golden Bay with the following rules: Feral cats can be kill trapped at the seven shorebird sites in Golden Bay – Taupata, Pakawau, Collingwood, the Parawhakaoho, Onahau and Rototai/Motupipi.

Night shooting to be allowed on only four sites – Taupata, the Parawhakaoho, the Onahau Sandspit and Rototai/Motupipi on the Rototai Sandspit, the Rototai Shellbank and on the accreted land between the Motupipi Estuary and Pohara Beach. These sites are all well away from any residential properties.

Residents to be notified seven days prior to undertaking either kill trapping or night shooting. Dates advertised in the Public Notices section of the Golden Bay Weekly, on the Golden Bay Community Noticeboard Facebook page and through leaflet drops to residents requesting people keep their cats indoors between sunset and sunrise.

#### PEST PLANTS:

Forest and Bird are requesting marram grass (*Ammophila arenaria*) is a notified pest plant in E Toru Nga Awa: Ko Takaka, Ko Motupipi ,Ko Onahau – the Three Rivers site.

Eradication of marram grass in the Three Rivers site would free up valuable nesting and roosting space. Nesting and roosting birds would no longer compete for space. Existing native vegetation, sand convolvulus, native spinach and sand carex would be able to flourish. Steep banks supporting marram grass would slump allowing Variable oystercatcher chicks to access sections of the sandspit/shellbank that are currently unavailable to them. Marram grass would no longer provide cover and habitat for predators. Predation of adult birds, eggs and chicks would be minimised. Marram grass is present on the Onahau Sandspit, the Rototai Shellbank and the Rototai Sandspit. On all of these sites, removal of marram grass is a priority.

ONAHAU SANDSPIT: Forest and Bird received funding from Tasman District Council's Community Grants to eradicate weeds on the Onahau Sandspit. This site is now under control and can be managed by our volunteers.

ROTOTAI SHELLBANK: Forest and Bird have received a grant of \$19,760 from the Rata Foundation for weed eradication and habitat restoration for the Rototai Shellbank. This work starts mid-April.

ROTOTAI SANDSPIT: Forest and Bird has asked the Nelson Tasman branch to redirect a donation of \$1000 they have received to the Golden Bay branch to eradicate weeds on the Rototai Sandspit.

Control of marram grass at these sites is both achievable and manageable.

The committee of Forest and Bird, Golden Bay: Gene Klein, Cynthia McConville, Kirstie McLeod, Heather Wallace and Pat Steer.





Department of Conservation  
*Te Papa Atawhai*

27 March 2024

DOC-7603656

The Chief Executive  
Tasman District Council  
Private Bag 4  
Richmond 7050

Dear Leonie

**Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029**

Please find enclosed a submission by the Director-General of Conservation in respect of the Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029.

Please contact Lionel Solly in the first instance if you wish to discuss any of the matters raised in the submission: phone 027 405 4459 or email [lsolly@doc.govt.nz](mailto:lsolly@doc.govt.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Nic John'.

Nic John  
Acting Director Operations  
Northern South Island

**Department of Conservation *Te Papa Atawhai***  
Whakātu Nelson Office  
Private Bag 5, Nelson 7042  
[www.doc.govt.nz](http://www.doc.govt.nz)

**BIOSECURITY ACT 1993**  
**SUBMISSION ON A PARTIAL REVIEW OF THE TASMAN-NELSON REGIONAL PEST**  
**MANAGEMENT PLAN 2019-2029**

**TO:** Tasman District Council & Nelson City Council

**SUBMISSION ON:** A proposed Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029 (the Partial Review)

**NAME:** Director-General of Conservation

**ADDRESS:** Address for service:  
  
Department of Conservation  
Private Bag 5  
Nelson 7042  
  
Attn: Lionel Solly  
Telephone: 027 405 4459  
Email: lsolly@doc.govt.nz

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

1. I **support** the proposed amendments to the Regional Pest Management Plan (RPMP), subject to the specific comments set out in Attachment 1 to this submission.
2. I **seek** the following decisions from the Councils:
  - 2.1 That the proposed amendments to the RPMP are **approved**, subject to any specific changes requested in Attachment 1.
  - 2.2 That the amendments, additions and deletions sought in Attachment 1 are made.
  - 2.3 Alternative relief of like effect to that sought in 2.1 – 2.2 above, and any consequential amendments required as a result of such relief.

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

I wish to be heard in support of my submission and if others make a similar submission, I may consider presenting a joint case with them at the hearing.

**SIGNATURE**



27/03/2024

Nic John  
Acting Director, Operations, Northern South Island

Pursuant to delegated authority  
On behalf of Penny Nelson  
Director-General of Conservation

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

**ATTACHMENT 1: PARTIAL REVIEW OF THE TASMAN-NELSON REGIONAL PEST MANAGEMENT PLAN 2019-2029: SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION**

I **support** the proposed amendments to the RPMP, subject to the specific comments set out below. Unless otherwise stated, I support the proposed amendments on the basis that they are consistent with the purposes and principles of the Biosecurity Act 1993 and the National Policy Direction for Pest Management Plans and Programmes.

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
General comments	Overall, the Partial Review is aligned with the National Policy Direction (NPD) and guidance material.	
General comments: Strategic intent and alignment with other strategic initiatives	<p>Whilst the RPMP has a particular statutory function and purpose, and must be prepared in accordance with the Biosecurity Act and NPD, it is desirable that it also:</p> <ol style="list-style-type: none"> <li>1. has clear strategic intent and SMART objectives (specific, measurable, achievable, relevant and time-bound);</li> <li>2. supports current strategic (regional and cross-regional) initiatives and programs for the restoration, protection and enhancement of indigenous biodiversity; and</li> <li>3. supports initiatives and programs that are currently in development, e.g. under the Kotahitanga mō te Taiao Strategy; and other collaborative landscape-scale projects that may be progressed during the period of the RPMP.</li> </ol> <p>These matters are relevant to the RPMP as a whole and to the proposal to include new pests and policies through this Partial Review.</p> <p>Whilst to a large extent the strategic initiatives and programs in (2) and (3) will depend on voluntary collaboration between partner organisations, landowners and the wider community, the RPMP can provide further strategic direction and a regulatory backstop to support the delivery of programs on the ground.</p>	Addressed in submissions on specific sections of the Proposal, below
General comments: Pest Management Programmes	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.	Addressed in submissions on specific sections of the Proposal, below
Feral and stray cats	I <b>support</b> the intent of the proposal to include site-led programmes for feral and stray cats in/adjacent to sites with high biodiversity values, where those values include species that are vulnerable to predation by cats.	<b>Amend</b> pest agent cat rule (b) for the St Arnaud environs site-led programme as follows: No person shall deliberately release into the wild (e.g. <u>i.e.</u>

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
	<p>Information on the impacts of feral and stray cats on native biodiversity is summarised on DOC's website at <a href="https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/feral-cats/">https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/feral-cats/</a></p> <p>I <b>support</b> the proposed site-led programme and rules for feral and stray cats in the environs of St Arnaud.</p> <p>I would however suggest an amendment to the wording of pest agent rule (b), which currently reads <i>"No person shall deliberately release into the wild (e.g. Nelson Lakes National Park and environs) any companion cat from or living within the mapped area."</i> As this is worded, it would not be an offence for someone from <u>outside</u> the mapped area to release a companion cat within the mapped area; and this should be addressed. The wording used is also different to that used in the pest agent rule for the Nelson City site-led programme, which would create inconsistency within the RPMP.</p> <p>Consideration should also be given to making this pest agent rule a region-wide rule. However, I appreciate that this would require further analysis of benefits and costs and further consultation and may therefore be outside the scope of the current partial review.</p> <p>I <b>support in principle</b> the proposed site-led programme for feral and stray cats in the Abel Tasman National Park private enclaves. However, it is unclear why these areas are only subject to the 'reporting' rule and not also the 'pest agent' rules that apply in the St Arnaud environs site led programme (subject to the amendment noted above).</p> <p>I <b>support in principle</b> the proposed site-led programme for feral and stray cats in Nelson City. However, it is unclear what criteria have been used to identify 'high value sites' and I would question whether all of the sites currently identified have significant biodiversity values that would merit being included in the site led programme. I also note that some sites are close to residential areas and well within the roaming distance of companion cats, which would limit the effectiveness of controls on feral and stray cats.</p> <p>I am however satisfied that the water catchment reserves in the Maitai and Roding, the area around the Brook Waimārama Sanctuary, the Wakapuaka Sandflats and Nelson</p>	<p>Nelson Lakes National Park and environs) any companion <u>or stray</u> cat <del>from or living within the mapped area.</del></p> <p><b>Consider</b> making the pest agent rule as modified above a region-wide rule.</p> <p><b>Amend</b> the rule for Abel Tasman National Park private enclaves to include the following pest agent rules:</p> <ol style="list-style-type: none"> <li>a. No person shall keep, hold or harbour any companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.</li> <li>b. No person shall deliberately release into the wild (i.e. Abel Tasman National Park and environs) any companion or stray cat.</li> </ol> <p><b>Clarify</b> the criteria used for identifying 'high value sites' in Nelson City and re-assess how these have been applied to ensure that sites included within the programme are justified and satisfy cost-benefit requirements.</p> <p><b>Clarify</b> whether other areas have been assessed against the criteria for 'high value sites'.</p> <p><b>Clarify</b> the process for adding additional areas to the RPMP if/when they are assessed to be 'high value sites'.</p>

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
	<p>Boulder Bank should be included in the site led programme for Nelson City.</p> <p>Depending on the criteria used, there are likely to be other areas within the Nelson-Tasman region that would qualify as ‘high value sites’. It is unclear whether other sites were considered for inclusion in the partial review of the RPMP and, if so, why they were discounted.</p>	
Pest and wilding conifers	<p>I <b>support</b> rules a, b, c and e.</p> <p>In relation to rule a (the clear land rule) the proposal states that ‘clear land’ is defined as <i>“parts of the region that are currently clear, (or infestations are at a low or very low density), but highly susceptible to wilding conifer spread if a seed source becomes established.”</i> The proposal also notes that ‘highly susceptible areas’ are currently undetermined and unmapped; and that there is an intention to map these areas within a year of RPMP amendments being adopted. Landowners and occupiers do require more certainty around the identification of land that is ‘highly susceptible to wilding conifer spread’ and I would therefore encourage to the Councils to make this a priority. It may not be possible to map all areas that are highly susceptible, based on current knowledge, and inclusion of criteria or descriptive text on the process for identifying highly susceptible land should also be included.</p> <p>I <b>support in principle</b> rule d, which requires occupiers to destroy any pest/wilding conifers on their land where they are located within a defined operational area that has received prior control. However, I have concerns that the rule might have unintended consequences for land managers. In particular, it is dependent on the transition from nationally/regionally funded control programmes to individual land managers, and the proposal notes that transitional criteria have yet to be determined nationally. It is conceivable that restricted funding (e.g. from NWCCP) will mean that control programmes will not fully ‘break the back of each problem’; and that, during the life of this plan, a certain (probably low) level of coning conifers will need to be accepted over some of the mapped areas. In this context, the ‘agreed level of work’ and ‘agreed control targets’ used to facilitate transition will need to be very carefully worded, and not open for interpretation by the Management Agency.</p>	<p><b>In relation to rule a, commit</b> to mapping or otherwise defining criteria for identifying areas that are ‘highly susceptible to wilding conifer spread’, within 12 months of the RPMP amendments being adopted, and make this information available on the Councils’ websites.</p> <p><b>In relation to rule d, clarify</b> the ‘agreed level of work’ and ‘agreed control targets’ used to facilitate transition from nationally/regionally funded control programmes to individual land managers.</p>

Long Term Plan 2024-2034 from Collin, Richard (Ru) organisation: Brook Waimarama Sanctuary Trust



## Long Term Plan 2024-2034

### Submitter Details

**Submission Date:** 03/04/2024

**First name:** Richard (Ru) **Last name:** Collin

**Organisation:** Brook Waimarama Sanctuary Trust

**Postal address:** Morrison Street, Nelson

**Suburb:**

**City:** Nelson

**Country:** NZ

**Postcode:**

**Email:** ru.collin@brooksanctuary.org.nz

**Daytime Phone:** +64274742022

**Would you like to present your submission in person at a hearing?**

*If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please include this information in your submission.*

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

### Feedback

**Key Issue 1: Rates affordability – Which option do you support?** (please tick one)

Option two – Medium service cuts and medium rates increases (Council's proposal)

Comments (Optional)

**Key Issue 3: Council's forestry approach – Which option do you support?** (please tick one)

Option two – Change our approach and exit commercial forestry over time and grow a continuous canopy of mixed species (Council's proposal)

Comments (Optional)

This decision sets the example for LGNZ to commit to long term planning based on sound reasoning and economic assessment. Although it might take the first 20 years to show any tangible benefit, they will become obvious for the 20-100 years, so well done. Council assets like the Sanctuary appreciate the decision made to possibly forfeit marginal returns in the short term in exchange for major biodiversity benefits that will flow from the medium and long term

**Key Issue 4: Marina CCO proposal - Which option do you support?** (please tick one)

With all three options, Council will retain 100% ownership of the organisation.

Option three – Asset-Ownng Council-Controlled Trading Organisation. The organisation would oversee and manage the Marina, and

Council would transfer the assets and liabilities to it and receive a dividend

Long Term Plan 2024-2034 from Collin, Richard (Ku) organisation: Brook Waimarama Sanctuary Trust

Comments (Optional)

**Key Issue 7: Tāhunanui Beach facilities – Which option do you support? (please tick one)**

Option one – Retain the current facilities at Tāhunanui Beach

Comments (Optional)

**Key Issue 8: Arts Hub – Which option do you support? (please tick one)**

Option two – Purchase an existing building and establish an arts hub (Council's proposal)

Comments (Optional)

Our preference is for Nelson CBD to a single building house art, library, and conference facilities in one place. The Blenheim conference center is a good example.

What Nelson really needs is a community building with the necessary support services wrapped around it that will allow 24/7 patronage

**Any other comments on the Long Term Plan 2024-2034 Consultation Document (Optional)**

Initial impressions

- Despite the natural environment being the first point listed in key community outcomes, there appears very little direct spending in the next 10 years for conservation
- A 'key issue' that has been omitted and should be included is Nelson tourism and visitor destination management. This is the one item where NCC can generate money, not spend loads of it, and it holds a lot of potential.
- The Economic funding impact statement indicates not a lot of support nor focus, when in our opinion it should be key issue for the next 10 years. The planned budget really only covers staff and suppliers and states "no intended changes to the level of service for this activity" ( see page 96 of the activity summaries) This is an activity to that should be reconsidered in this LTP.
- Big savings in weed control- see page 87. We see the growing weed problem across the district as serious, and only going to get worse if it is not controlled. This real threat to NCC budget will only catch up with NCC later with even more cost and resources needed to achieve control to acceptable levels. This is a bad decision to cut spending in this area of activity
- Camps. See page 85, and its noted that no capital investment is intended for Maitai or the Brook after year 1. we would like this revisited in the short term

Maybe someone can explain the following queries.

Activity summaries- Specifics

1. Transport. Brook street road repair (since August 2022) isn't listed in flood related repairs work. In the budget on page 93 of the activity summary Is it covered under "Brook street slips", where 4 projects totaling \$3m is included? Does this same provision include the Brook steam bank work located at the dam car park?
2. Preservation work. Where is that covered in the LTP?
3. Where is the budget for economic development and tourism related activity and promotion? Since the budget will be directed to be mainly used by NRDA why isn't the TDC contribution highlighted as income? Or isn't there going to be any contribution from TDC for the next 10 years?



**Submission by the**  
**Royal New Zealand Society for the**  
**Prevention of Cruelty to Animals Inc.**

**on**

**Partial Review of the**  
**Tasman-Nelson Regional Pest Management Plan**

28 March 2024





## Executive Summary

- SPCA acknowledges there are times when controlling the populations of non-native wild animals is necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of the targeted species.
- SPCA commends the inclusion of cat categories distinguishing between companion, stray, and feral cats in the partial review of the Tasman-Nelson Regional Pest Management Plan.
- SPCA urges both councils to promote and support the microchipping and registering of microchips on the Companion Animal Register of all companion cats in Nelson and Tasman.
- SPCA acknowledges the efforts of many people who support the lives of individual stray cats and those living in colonies.
- SPCA acknowledges that managed, targeted Trap-Neuter-Return (mtTNR) can be an important longer-term management tool for stray cats. SPCA does not support trap-neuter-return programmes in areas where cats pose a significant risk to native wildlife.
- Animal control should be conducted as part of an integrated pest management programme that includes human behaviour change, assessment of harms to animals intentionally and unintentionally targeted, and monitoring of efforts. Lethal management methods should only be used when there is no effective non-lethal, humane alternative.
- SPCA advocates that the Tasman-Nelson Regional Pest Management Plan include education and training for humanely reducing and eradicating targeted species.
- SPCA opposes the use of poisons, leghold traps, and snares to kill or capture animals due to the severe welfare harms animals experience from the use of these methods of management.
- SPCA is concerned about traps that rely on a noose-like mechanism to kill an animal that poses a strangulation hazard to the trapped animal. SPCA advocates for more research on this topic to determine if the mechanism of death is acceptable based on welfare harms.



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## **Introduction**

The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (trading as SPCA).

SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. The Society has been in existence for over 150 years with a supporter base representing more than 100,000 New Zealanders across the nation.

The organisation includes 29 Animal Welfare Centres across New Zealand and approximately 60 inspectors appointed under the Animal Welfare Act 1999.

SPCA welcomes the opportunity to submit on the partial review of the Tasman-Nelson Regional Pest Management Plan 2019-2029.

## **Submission**

SPCA acknowledges the efforts of the Tasman Regional Council and the Nelson City Council to protect biodiversity. Protecting biodiversity is important for the health and welfare of native wild animals. SPCA acknowledges there are times when controlling the populations of non-native wild animals is necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of the targeted species. Below, we address welfare concerns related to the control of animals considered pests in the partial review of the Tasman-Nelson Regional Pest Management Plan 2019-2029. We provide recommendations for how the Tasman Regional Council and the Nelson City Council can support more humane practices for protecting biodiversity.

SPCA advocates that any person engaging in pest management use an ethical framework to decide action towards animal population control. Using both an ethical and evidence-based



approach, Dubois et al. (2017) created a framework for making decisions about animal population control based on the following questions:

- Can the problem be mitigated by changing human behaviour?
- Are the harms serious enough to warrant wildlife control?
- Is the desired outcome clear and achievable, and will it be monitored?
- Does the proposed method carry the least animal welfare cost and to the fewest animals?
- Have community values been considered alongside scientific, technical, and practical information?
- Is the control action part of a systematic, long-term management program?
- Are the decisions warranted by the specifics of the situation rather than negative labels applied to the animals?

The Dubois et al. (2017) framework factors human behaviour, attitudes, and values, animal welfare, and rigorous planning, monitoring, and evaluation into decisions about pest management.

Educating both the public and professional user should include integrated pest management strategies that include changing human behaviour first, including better management of food sources and habitat for targeted animals as integral components of reducing animal populations (Dubois et al., 2017; Parsons et al., 2017; Quinn et al., 2019). Community engagement efforts to protect biodiversity should include education and advocacy for humanely controlling and eradicating targeted species. Many New Zealanders who support efforts to protect native animals and habitats are also concerned about the welfare of animals targeted for population control (Goldson et al., 2015), indicating opportunities to strengthen community engagement by promoting activities that align with public concerns and values. For example, educating landowners on more humane trapping and killing of animals may create a more sustainable effort if landowners are concerned about reducing the suffering of targeted and non-targeted animals on their property.



SPCA advocates cat management efforts are informed by specifics of the situation to justify cat management, understand the scope of management needed, and evaluate the impact of cat management including:

- Specifics of the target such as the number or density of cats and the type of cats (see below) in an area that is targeted for cat management (McDonald & Hodgson, 2021; Miller et al., 2014).
- Impacts cats have on the area, including on native wildlife, farmed animals, and in communities.
- Social license to manage cats in an area, including cat owners and stray cat care providers' views about the proposed actions.

### ***Use cat categories to inform cat management***

SPCA commends the inclusion of cat categories in the partial review of the Tasman-Nelson Regional Pest Management Plan. SPCA recognises three different types of cats in New Zealand:

- **Feral cats** do not rely on human activity to survive and are generally located in remote areas. Feral cats have a wild temperament and are not suitable as companion animals. None of their needs are provided by humans and their population is self-sustaining.
- **Stray cats** are considered unowned and live near people. Stray cats vary in their sociality and dependence on humans. They may rely on people to some degree, either directly or indirectly, to meet their needs, such as food and shelter. Stray cats can live as individuals or in groups (colonies). Some stray cats are lost or abandoned companion cats, whereas others were born stray.
- **Companion cats** are considered owned and dependent on people to meet their needs.

These different types of cats form a metapopulation where there is a flow between the subpopulations (McDonald & Hodgson, 2021; Miller et al., 2014). For example, undesexed companion cats can have unplanned litters of kittens that end up living as stray cats. Stray cats that live in rural landscapes and are unsocialised to humans may end up contributing to feral cat



populations. Categorising cats as companion, stray, and feral helps determine the options for managing these different sub-populations of cats.

SPCA is concerned with how the Council will distinguish feral and stray cats from companion cats under the Regional Pest Management Plan. Tools such as microchipping and microchip registration can help distinguish companion cats from stray and feral cats. However, the most current national-level statistics indicate that approximately only half of owners have microchipped their cats (Companion Animals New Zealand, 2020). We urge both Councils to consider the reality that cats living in remote areas may be lost or abandoned companion cats and that it is worthwhile to check for a microchip on any cat that is trapped, regardless of their behaviour.

We advocate for all companion cats to be microchipped and have their microchip registered on the New Zealand Companion Animal Register. We urge both councils to promote and support the microchipping of all companion cats in Nelson and Tasman, with a particular focus on residential areas that are near locations where cats will be managed.

SPCA advocates for both Councils to extensively consult with residents whose companion cat's home range is likely to include the areas where cats will be managed under the Regional Pest Management Plan. Most companion cats in New Zealand roam (Companion Animals New Zealand, 2020), and companion cat home ranges in New Zealand can vary depending on location but have been reported as 1.2 km for urban cats and 2.4 km for rural cats (Metsers et al., 2010).

### ***Support more responsible cat ownership***

Cats are one of New Zealand's most popular companion animals. SPCA supports responsible ownership of companion cats to promote cat welfare and reduce problems with cat overpopulation. We provide more information [here](#) on the importance of desexing, microchipping and keeping cats at home. SPCA is concerned with a recent decrease in the number of companion cats that are desexed, only half are microchipped, and very few are kept at home (Companion Animals New Zealand, 2020).



Each year, on average 20,000 cats and kittens come into our Centres. Many of these animals are directly or indirectly (through stray cat populations) a result of an owner failing to desex their companion cat. Our SPCA Centres regularly see the welfare problems related to irresponsible companion cat ownership, including:

- the predictable cycle of unplanned litters of kittens born each year because there are too many undesexed companion cats allowed to breed;
- the number of cats and kittens who are lost or have strayed, and we cannot find their owner because they are not microchipped, or their microchip details are not registered on a national database; and
- the number of cats and kittens that are injured, diseased, and lost or strayed because they are allowed to roam freely from home.

We also know that irresponsible cat ownership can lead to nuisance in communities (e.g., spraying, toileting, fighting), predation on wildlife, and the spread of toxoplasmosis to people and animals including farmed animals and vulnerable native marine mammals (e.g., Hector's and Māui dolphins).

Desexing and microchipping companion cats and keeping them at home are some of the few tools we have for addressing problems with stray cats in our communities. Desexing a companion cat helps prevent unplanned litters of kittens which can end up as stray cats. Having a microchip registered on the New Zealand Companion Animal Register can help us identify an owner to reunite with a lost companion cat that may be living as a stray. Keeping cats at home decreases their likelihood of becoming lost or straying.

Our work in New Zealand communities to increase the number of desexed and microchipped cats and kittens is fundamental to our mandate to prevent cruelty and advance animal welfare. The cost of the procedure is the most common barrier for companion cat owners to desex and microchip their cats (Companion Animals New Zealand, 2020). Our Snip 'n' Chip programme offers subsidised desexing and microchipping for people who need help with overcoming the cost of the procedures. SPCA works closely with local veterinarians to provide this service. The



vouchers are often 'sold out' quickly once they are available, indicating this is a much sought-after service in communities.

We urge the Council to promote and support the desexing and microchipping of companion cats in Nelson and Tasman to protect cat welfare and help address problems with stray cats in the community. SPCA has worked closely with Whangārei District Council, Auckland Council, Waitaki District Council, Dunedin City Council, and four Auckland Local Boards to address the barriers to desexing and microchipping cats.

### ***Multiple options for stray cat management***

Stray cat management is complex because of the different reasons why cats end up as stray, and the concerns about their welfare from community members. SPCA acknowledges the efforts of many people who support the lives of individual stray cats and those living in colonies. We recognise the meaningful relationships that cat care providers have with stray cats (Ma et al., 2023; Neal & Wolf, 2023). We urge both Councils to work closely with community members who provide care to stray cats to identify humane strategies that can effectively reduce the number of stray cats in the area.

Desexed stray cats can have better welfare compared to intact cats (Gunther, et al., 2018). Improved health for both male and female cats in managed colonies may be related to decreased risk of infectious disease, nutritional deficiencies, and stress associated with reproduction (Gilhofer et al., 2019) and reduced reproduction-related aggression in males (Cafazzo et al., 2019; Finkler et al., 2011; Gunther et al., 2018).

SPCA advocates for rehoming stray cats if a cat has been socialised to people or the cat is young enough to be socialised and rehoming would not be detrimental to their welfare. SPCA advocates for euthanasia to be provided if it is in the cat's best interest, for example, if a stray cat is in poor health or injured and euthanasia is to relieve suffering.





SPCA acknowledges that managed, targeted Trap-Neuter-Return (mtTNR) can be an important long-term management tool for reducing stray cat colonies to extinction. People responsible for mtTNR use a register to track the individual cats, desex all cats as needed, provide veterinary care, rehome adoptable individuals, and monitor all cats including new cats that enter the area.

Cat colony management plans need to include means of identification of cats such as ear tipping; provision of food, water, and shelter; a vaccination and parasite programme; provision of veterinary treatment; a desexing programme; and a long-term management strategy including continuity of care.

Success in decreasing a cat colony, including extinction, using trap-neuter-return (TNR) varies (Jones & Downs, 2011; Kilgour et al., 2017; Levy et al., 2014). Some studies report declines in colony size (Levy et al., 2003; Natoli et al., 2006), whereas others report an increase in colony size over time (Castillo & Clarke, 2003; Gunther et al., 2011). An increasing body of evidence indicates that long-term TNR programmes can effectively reduce free-roaming cat populations, especially those programmes that include an adoption programme, monitoring, and desexing of new cats arriving at the colony (Hughes & Slater 2002; Kilgour et al., 2017; Levy et al., 2003; Spehar & Wolf, 2019; Stoskopf & Nutter, 2004).

Population modelling suggests that 75-80% of adult breeding cats in a colony need to be desexed to see a decrease in the cat population (Foley et al., 2005; McCarthy et al., 2013; Miller et al., 2014). However, the percentage of cats that need to be desexed to result in population reduction will depend on many factors including the mean lifespan of cats in the colony, migration rates, population density, urbanisation, climate, availability of resources, and other environmental factors (Boone, 2015; Kilgour et al., 2017; Miller et al., 2014; Schmidt et al., 2009).

A colony will require monitoring for any new cats that immigrate into the area to ensure they are provided care, desexed, and identified. Colony size increases are more likely when there are high rates of cats entering the colony as strays or abandoned companion cats (Castillo & Clarke, 2003; McCarthy et al., 2013; Miller et al., 2014, Natoli et al., 2006). It is an offence under the



[Animal Welfare Act 1999](#) Section 14(2) to desert an animal in circumstances in which no provision is made to meet the animal's physical, health, and behavioural needs.

SPCA does not support mtTNR programmes in ecologically sensitive areas where cats pose a significant risk to native wildlife. TNR strategies are not useful when there is an urgent need to remove cats from an area.

### ***Improving live trapping***

Protecting an animal from environmental conditions is important to consider for live capture traps (Beausoleil et al., 2022). Live capture traps should be set where a trapped animal is protected from environmental conditions such as hot or cold temperatures, rain, snow, or wind. Traps used in colder temperatures should have nesting material to help maintain an animal's ability to thermoregulate. Traps used in warmer weather should be placed out of direct sunlight and be checked before the heat of the day to help ensure the animal does not experience heat stress (British Columbia Society for the Prevention of Cruelty to Animals, 2022).

Live capture trapping can be improved by reducing the time an animal spends in a live trap (Iossa et al., 2007). Remote sensors can detect when a live trap has been triggered and alert an operator when an animal has been captured (Iossa et al., 2007; Ministry for Primary Industries, 2020). SPCA advocates for live-capture trap operators to use technologies such as remote-sensing of captures to reduce the amount of time an animal spends in the trap.

If live-capture cage traps are used without an alert system, then an operator should visit the trap more frequently than is required by law, depending upon the species targeted, the likelihood of catching a non-targeted animal, exposure to thermal extremes or inclement weather, the trap used, and its location. All trapped animals must be attended to once discovered.



### ***Improving lethal control***

SPCA acknowledges that sometimes it is necessary to lethally control individuals or populations of animals to protect biodiversity, agricultural interests, and human and animal health. Animal control should be conducted as part of an integrated pest management programme that includes human behaviour change, assessment of harms to animals intentionally and unintentionally targeted, and monitoring of efforts. Lethal management methods should only be used when there is no effective non-lethal, humane alternative. Please see SPCA's [position on pest management](#) for more information.

A humane shooting should result in the shortest period between when the animal is shot and when they experience irreversible loss of consciousness followed by death (Aebischer et al., 2014; Sharp & Saunders, 2012; Stokke et al., 2018). Best practices to ensure a humane shooting include (Aebischer et al., 2014; Sharp, 2012):

- shooters are competent and can clearly identify the animal before taking a shot;
  - the correct firearm, ammunition, range, and shot placement are used;
  - a wounded animal is promptly killed; and
  - if lactating animals are killed, efforts are made to find and humanely kill her offspring.
- All efforts should be made to avoid peak kitten season.

Live-capture or kill animal traps are widely used by professionals and members of the public in New Zealand. Many options of traps are available for importation, sale, or use in New Zealand, however, they range in their effectiveness in safeguarding the welfare of targeted and non-targeted animals. Animals caught in traps likely experience negative welfare impacts (Cowan & Brown, 2012). An animal caught in a live capture trap may experience physical or mental distress from injury, including self-injury (Iossa et al., 2007). An animal caught in a lethal trap may experience a protracted period before they become unconscious or insensible followed by death.



Lethal traps should cause irreversible loss of consciousness and death as quickly and painlessly as possible and avoid catching non-target animals. Only traps that have passed welfare performance testing should be used such as the National Animal Welfare Advisory Committee Guideline 09 (National Animal Welfare Advisory Committee, 2019).

Animals captured live with the intention of killing should be humanely killed as soon as possible by a competent person. An animal can be transported to a veterinarian willing to perform a humane killing. It is an offence under the [Animal Welfare Act](#) to kill an animal by drowning. Drowning is not a humane death (American Veterinary Medical Association, 2020; Beausoleil & Mellor, 2015). Drowning results in a fast and persistent decrease of oxygen in the blood, ingestion of liquid in the airways, acidosis, and elevated levels of carbon dioxide in the blood; all these symptoms an animal experiences while conscious (Beausoleil & Mellor, 2015; McEwen & Gerdin, 2016). Drowning leads to severe 'air hunger' which is considered the most unpleasant affective state associated with breathlessness (Beausoleil & Mellor, 2015).

### ***Non-targeted animals***

Traps should only be used for the intended targeted animal. It is also important to consider the welfare of non-targeted animals in the choice and positioning of traps. Many traps are designed to exclude non-targeted animals which helps reduce unintended harms of controlling and eradicating targeted animals. For example, certain traps require placement in a tunnel that has wire mesh baffles to prevent non-target animals from entering the tunnel (Department of Conservation, 2021). Excluders can be purchased by the trap manufacturer or in many cases constructed according to instructions (see Department of Conservation, 2021).

### ***Trap operator competence***

Humane trapping is more likely when trappers are familiar with the type of trap they are using and the species of animal they are targeting. Trappers should first assess an area intended for animal control by using track tunnels, chew cards, wax tags, or cameras (Department of Conservation, 2021).



Trap operators should know how to properly position bait to ensure the animal is trapped as intended and maintain traps in proper working order (National Pest Control Agencies, 2015a). Trap operators should be skilled in trap maintenance to ensure they are working effectively, and determining when using a trap is worn out and no longer effective.

New Zealanders support efforts to protect native animals and habitats, however, they are also concerned about the welfare of targeted animals (Goldson et al., 2015). This indicates an opportunity for the Council to strengthen their community engagement by promoting activities that align with public concerns and values. For example, educating landowners on more humane trapping and killing of animals may create a more sustainable effort if landowners are concerned about reducing the suffering of trapped animals on their property.

### ***Methods of control that SPCA opposes***

SPCA opposes the use of lethal control methods that do not minimise harm to target and non-target animals.

- SPCA opposes the use of poisons to kill animals for pest management due to the symptoms they experience and the duration of time until they are insensible before death once they start feeling symptoms of poisoning.
- SPCA opposes the use of leg-hold traps because of the welfare harms they cause to trapped animals and because they are indiscriminate in how they catch animals. Leg-hold traps consistently rank lower as a humane method compared to other methods of control for many species including feral cats (PestSmart, 2018, February 1).
- SPCA opposes the use of snares (i.e., free running, free running with fixed stops, and self-locking snares including those using stops, ratchets, etc.) because of welfare harm they cause to captured animals (Iossa et al., 2007; Proulx & Rodtka, 2017). Some injuries inflicted by snares may not be evident for hours to days after the animal is released or escapes (Iossa et al., 2007). Incorrect use of snares can increase the likelihood of non-target animals being trapped and animals being trapped by body parts for which the



snare is not designed, increasing the likelihood of injuries, pain, and distress (Iossa et al., 2007).

- SPCA is concerned with traps that rely on a noose-like mechanism to kill an animal. Traps that use a noose-like mechanism to constrict the animal's blood supply and air also run the risk of strangulation. Traps with a noose-like kill mechanism have passed welfare performance testing and are available for sale and use in New Zealand (Bionet, n.d.). However, breathlessness is a serious welfare harm, and the potential of these types of traps to cause breathlessness is concerning (Beausoleil & Mellor, 2015). SPCA advocates for more research on this topic to determine if the mechanism of death is acceptable based on welfare harms.

## Conclusion

SPCA appreciates the opportunity to contribute to the partial review of the Tasman-Nelson Regional Pest Management Plan. Our organisation is happy to discuss this matter if further information is required.



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3

Submission regarding Pest Management Plan 7th March 2024  
NELSON CITY COUNCIL and TASMAN DISTRICT COUNCIL.

I heartily agree that the above plan needs to be amended and more currently being proposed.

I am of the opinion that both councils have been “sleeping” on the job for PEST plants spread all over the district. Some on private land, some on NC Maybe it’s high time for more education on these many species, which is Following is a list of species easily found on the hills around Nelson and Tas NATIONAL PEST PLANT ACCORD which means BANNED from SALE, DIS PROPAGATION. ( # Blackbirds are also a major spreader of some of these



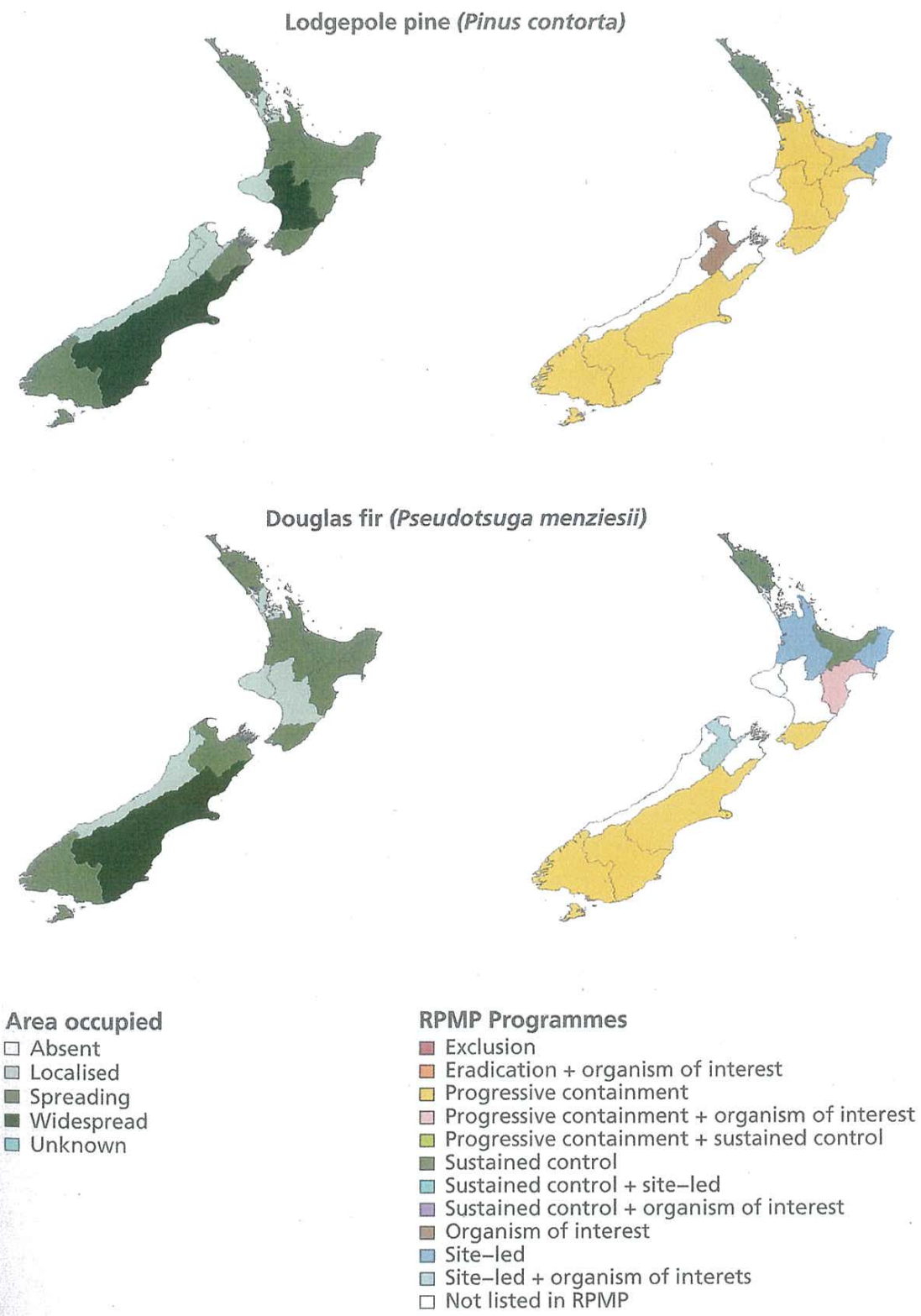
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1. # BONESEED ( BANNED in parts of NZ )
2. # PRIVET ( BANNED from sale, distribution or propagatio
3. CLEMATIS vitalba ( BANNED “ “ “ “ “ “
4. Mexican Daisy ( BANNED “ “ “ “ “ “ “
5. KAHILLI Ginger ( BANNED “ “ “ “ “ “
6. Chilean Rhubarb ( BANNED “ “ “ “ “ “ “
7. AGAPANTHUS ( Now on BLACK list for a National BAN )
8. # IVY ( Now on BLACK list for National BAN )
9. # FAN PALM Trachycarpus fortunei ( Now on BLACK list for Nationa
10. Creeping Fig ( Aggressive, on list of invasive species NZ & Austral
11. # Cotoneasters, large and small leaved.
12. Gorse
13. Broom
14. Blackberry
15. Tradescantia ( Wandering Jew )
16. Climbing Dock
17. Buddleia
18. Hawthorn
19. Banana Passionfruit
20. LODGEPOLE PINE, DOUGLAS FIR, ( HUGE fire risk, bio diversity l  
HUGE threat to our Native landscapes, already costing billions ever  
Sadly Agapanthus, Fan Palm and Creeping Fig have been actively |

Pamela Pope, 46 Stansell Ave., Tahunanui, Nelson 7011  
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[pamela.jade74@gmail.com](mailto:pamela.jade74@gmail.com) 7th March 2024





Source: data supplied by council staff, 2021

Figure 7.10: Regional extent (left side maps) and RPMP management programmes (right side maps) of old man’s beard, boneseed, wild ginger, lodgepole pine and Douglas fir.





For details on how to safely remove privet, head to our website:  
<https://www.tiakitamakimakaurau.nz/pest-search/> &  
<https://www.conservationauckland.nz/pest-search/>

**Tree privet**

**Tree privet**

**Chinese privet**

## Privet - A Pest Plant!

- 1. Risk to native species**

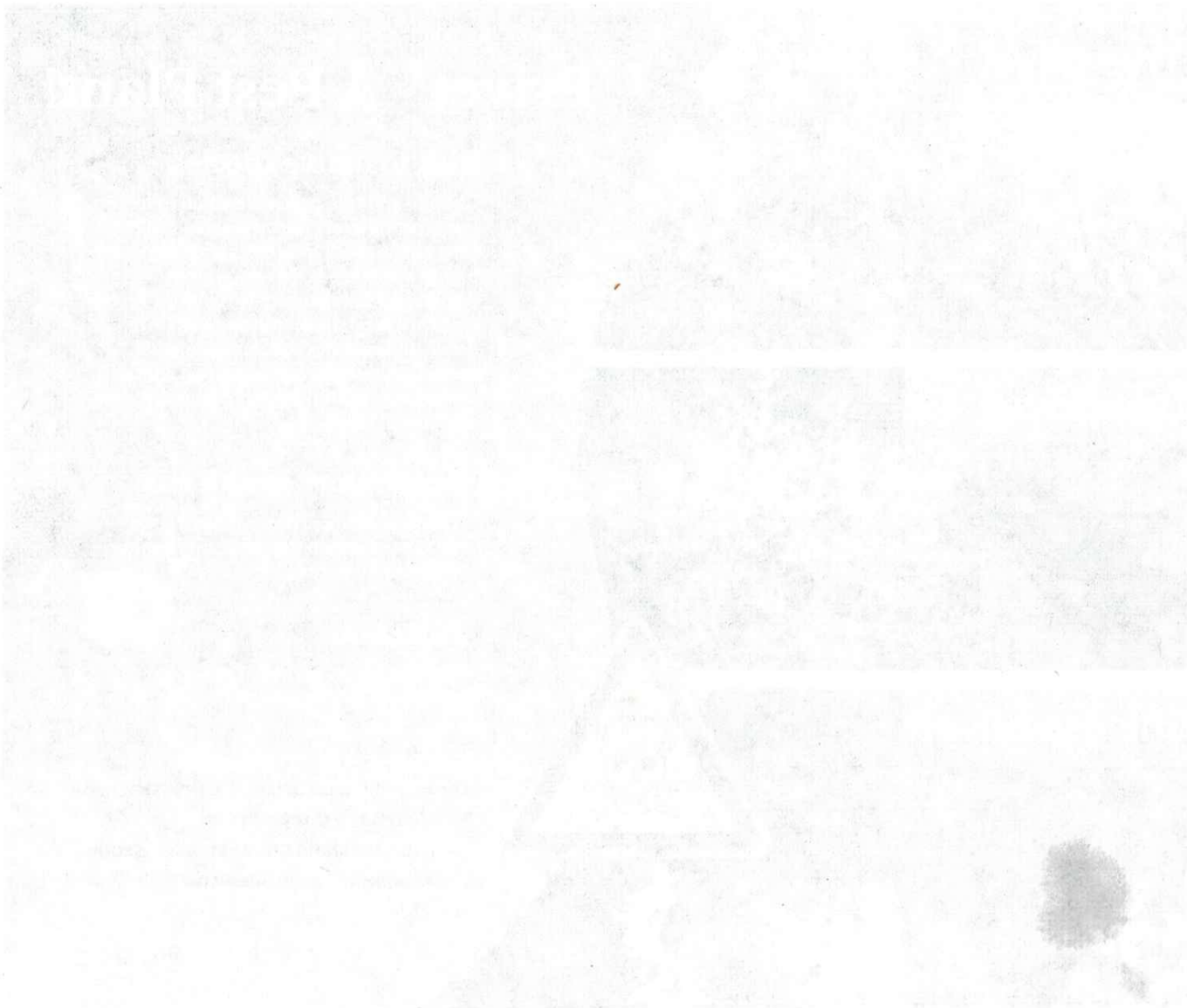
Chinese and tree privet are small to large fast growing evergreen trees that can be very long lived. These trees produce many highly viable seeds that are widely dispersed most commonly by birds. Privet seeds are very shade tolerant and form dense understories shading out native species, eventually replacing parts of the canopy and in some cases form entire canopy coverage.
- 2. Respiratory health risk**

When in bloom, privet produces large amounts of pollen that can cause health problems for people.
- 3. Poisonous**

The leaves and berries of privet are poisonous to animals and people.
- 4. Removal instructions**

For more information and instructions on how to remove this pest plant, go to the Auckland Conservation website: [www.conservationauckland.nz/pest-search/](http://www.conservationauckland.nz/pest-search/)

If Auckland can do this why  
can't NELSON  
Tahuna Hills are covered.



Submission regarding Pest Management Plan 7th March 2024  
Nelson City Council and Tasman District Council.

I agree that it is high time both Councils took seriously the problems being caused by Feral, Stray and Companion CATS in the top of the South Island in the many areas under your watch.

We are lucky enough to have the Abel Tasman Nat Park and the Brook Waimarama Sanctuary in our area but if the Councils don't come onboard and make a better effort regarding Cats all that huge effort by Volunteers and paid Workers and millions \$ could be wasted.

Feral and Stray CATS.

1. They are a huge threat to our Endemic species, causing huge bio diversity loss in many areas.
2. Spreading disease, to other species including Humans.
3. Sadly they are now finding Dolphins dying of Toxoplasmosis.
4. Sadly Kiwi are also dying of a Round Worm from Cats, somehow the worm is getting into fenced sanctuaries from cats prowling the fence line. It goes to the Kiwis brain and kills them.
5. Tapawera farmer lost approx. 120 Lambs from a major outbreak in his flock. They had been vaccinated. Huge cost to him.

Companion CATS !

It is high time there was far more control, micro chipped and spayed to reduce unwanted kittens that get dumped or left to roam  
Can you tell me why other peoples cats are entitled to use my garden as a toilet and a killing field of Skinks and Endemic birds.

I note that the Robins, that are over flow from Zealandia are being killed, they have installed cameras and confirmed it is domestic cats.

We have got to do far better than this, 56 Feral Cats caught on one 1/4 acre section in the Tasman District. That is SHOCKING numbers. It should be illegal to catch, spay and release also. I know that is happening in some areas.



Hedgehogs.

We need to pay attention to this problem also, they also carry Toxoplasmosis and cause massive bio diversity loss. Skinks, Gecko, Ground nesting birds don't stand a chance with Hedgehogs around.

Pamela Pope, 46 Stansell Ave., Tahunanui, Nelson 7011  
[pamela.jade74@gmail.com](mailto:pamela.jade74@gmail.com) 7th March 2024

Contain Cats N.Z!!

P J Pope 7th Mar 2024



# Parasites from cats proving to be killer for kiwi

## Wildlife

Mereride Hubbard

Kiwi are being killed by roundworms that come from cats, a Massey University study has shown.

In an article published in *IJP: Parasites and Wildlife*, researchers used molecular tools to identify the parasites which come from cats as their primary hosts.

Chief supervisor Brett Gartrell said that in post-mortem necropsies, he had seen parasites moving through the brain of kiwi, but they didn't know what they were or where they came from.

The kiwi were usually young, presented as "wobbly", had difficulty standing, and died.

"What we were seeing is the larvae of those roundworms finding themselves in the kiwi, and not knowing which way to go, were migrating all through the body and ending up in the brain."

While it was suspected that Toxocara roundworms might be the culprit, it wasn't until Adrienne French, a specialist veterinary pathologist skilled in postmortem analysis, was able to "dig out" the section of the parasite and extract its DNA that the worm could be identified.

One of the challenges that researchers didn't expect, Gartrell said, was that while there was growing information on the DNA of all sorts of mammals and birds and reptiles, there was very little on parasites.

"Taking samples from dead birds, the DNA is never quite as good as it is from a live sample, a biopsy, so that was a bit tricky, but Dr. French did great work and worked her way through."

Gartrell said the birds studied were mostly kiwi that were part of Operation Nest Egg, in which eggs are taken from the wild, reared in captivity and then kept in a crèche until they got to a certain size or weight, usually around 800 to 1000 grams. At that point they were released to survive the worst of stoat predation.

He said that it was kiwi within fenced outdoor sanctuaries that seemed to be picking up the parasite.

*"It's not enough to put the fence up. You've got to keep cats away from the periphery as well."*

**Brett Gartrell**  
Massey University

"We know from surveillance footage from the fences that cats patrol around the outside of the fences. They can't get into the sanctuaries themselves but they are often patrolling the fenceline.

"We think that either that they are pooping and the rain is washing their poo and parasites into the sanctuary, or invertebrates like earthworms are getting it and being picked up by birds and dropped in there, and the kiwi are picking it up that way."

Gartrell said while this condition was "rare" and not on the scale of "dogs in Northland" or stoat predation, they were still seeing 5 or 10 cases a year of it, so it was occurring "fairly frequently".

"It's an indirect way cats are putting pressure on native species as well – the parasites from the cats are actually causing mortality."

There was no way to tell if the cats were domestic or feral – and the parasites could be carried by both.

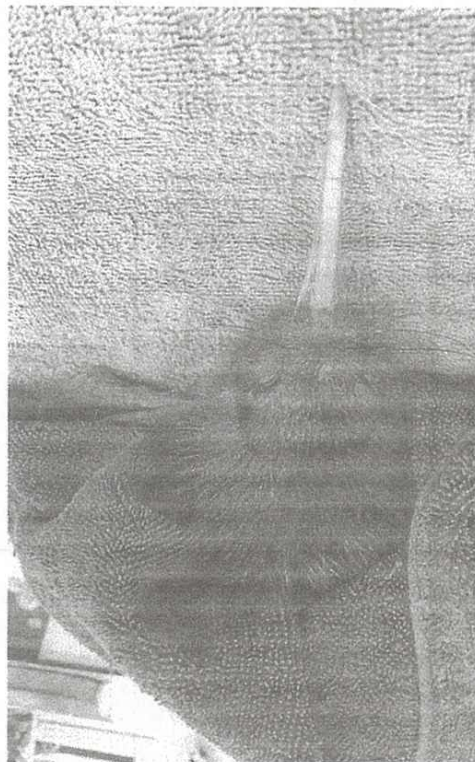
"Toxocara cati can migrate into other animals including people, so it makes good sense to worm your cats regularly, and you'll keep these parasites out of them."

Gartrell said it was another reason why we needed to control cats, which shouldn't be in sensitive environments. Feral cats would build up parasites that would affect their welfare and spill over into other species.

The research was funded by Taranaki philanthropic group the George Mason Charitable Trust, which provided a \$150,000 grant.

The study could help with the management of sanctuaries, Gartrell said.

*"It's not enough to put the fence up. You've got to keep cats away from the periphery as well."*



A call to keep cats from the edges of sanctuaries has followed a study that revealed roundworms from felines are killing kiwi.





# Cat eats 28 native lizards

## Intervention by a Yeoman

Wildlife scientists are calling for tighter cat management regulations after a feral cat ate a large number of native lizards in central Otago.

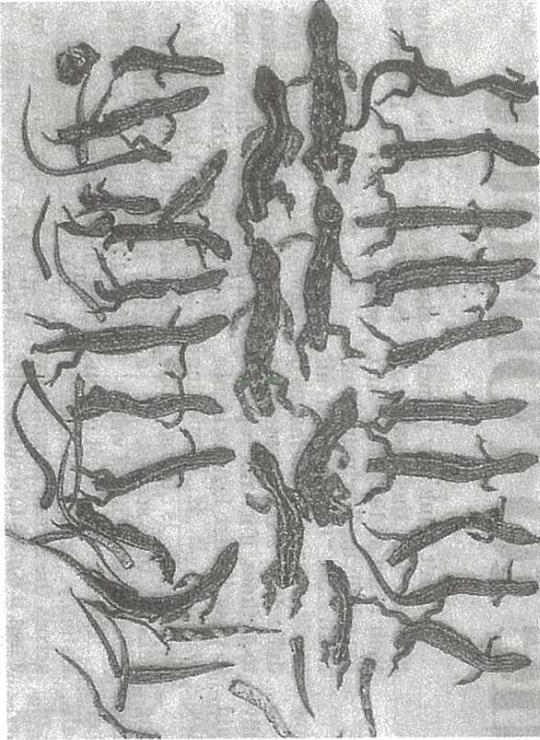
Alexandra resident Joe Sherriff put walking his dog on the outskirts of the township when he saw something glistening ahead of him. He took a closer look, and realised it was a pile of dead lizards.

Sherriff spread them out and identified them. There were 28 lizards, a mixture of McCann's skinks and schist geckos.

Sherriff contacted Dr Grant Norbury, a Manaaki Whenua Te Papa Research Wildlife Ecology and Conservation specialist who specialises in predator dynamics. "Given that it was a pile of lizards, with missing tails and puncture wounds, it was clear like a cat had regurgitated them. Cats are known to cough up food if they've overdone it," Norbury said.

Norbury sent the photographs to several of his colleagues for their opinions, including herpetologist Dr James Reardon, a Department of Conservation science adviser, and they agreed it looked like a regurgitation.

He said that the lizards were minimally digested showed



A cat regurgitated 21 McCann's skinks and seven schist geckos.

JOE SHERRIFF

stomachs of feral cats in the past.

Professor Yolanda van Heezik, an urban ecologist at the University of Otago, said it was possible the cat in question was someone's pet cat given the lizards were found about 400 metres from housing. "Tracking studies show pet cats roam about three hectares in the middle of suburbia, and even further on the edge of town."

"Cat predation on our native wildlife is a really difficult issue, because cats are such important

feral or pet cat, we have to acknowledge that pet cats are part of the problem for our wildlife."

Reardon said many people don't know that Aotearoa has some of "the most fascinating and diverse lizard faunas on the planet" with more than 120 native lizard species. "But around a quarter are critically or nationally endangered, which means they are at imminent risk of extinction. And nearly all are threatened to some degree."

New Zealand is quite unusual in that we allow our cats to largely roam freely. "In Australia it's more socially accepted to keep cats indoors, and not out hunting. And in large areas of America it's the same," says Reardon.

Van Heezik agrees. "It's like they've several decades ahead of us in terms of their thinking about cats." She said she was not suggesting people should not have cats, but rather manage them in a way that reduced harm to wildlife. "Ultimately it would be best if people contained their cats 24/7."

This could be either inside the house or in a "catio", a type of outdoor enclosure that's common in North America and Australia.

"It's not only lizards around Central Otago, it's also birds and invertebrates. And it's across the whole country, in our big cities too," says Norbury. "We've got a

**"We've got a real problem, we need to change the way we're managing our cats."**

**Dr Grant Norbury**  
Wildlife ecologist

cats aren't a problem. They think feral cats do that damage, and their



## **Tākaka Hill Biodiversity Group Trust (THBGT) Feedback on the Tasman Nelson RPMP Partial Review Proposal 2023-2024**

### **Summary**

The feedback provided by the Tākaka Hill Biodiversity Group Trust (THBGT) on the Tasman Nelson RPMP Partial Review Proposal highlights several key points. Including ten conifer species in the pest conifer control program is a positive step towards sustainable control and preservation of native ecosystems. The Trust emphasises the importance of proactive measures and specific management strategies in safeguarding the environment for future generations.

However, concerns are raised regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on occupiers, and the need for clear transitional criteria. The Trust advocates for clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual occupiers.

Suggestions are also made for implementing an incentive-based approach to motivate occupiers to act in controlling wilding conifers, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations. The Trust underscores the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding conifers.

Overall, the Trust's feedback emphasises the need for a collaborative and well-defined approach to effectively manage pest and wilding conifers, protect biodiversity, and address the challenges faced by land occupiers in the Tākaka Hill area and the region.

**Our feedback provides specific references to page numbers and headings in the T\_NRPM Partial Review Document for clarification.**

#### **1. Page 39. 4.5 Pest conifers and wilding conifers**

**1.1.** The proposed inclusion of ten conifer species in the pest conifer control program marks a positive step forward. By categorising these species and detailing specific management strategies, the Council demonstrates proactive measures aimed at sustainable control and preservation of native ecosystems.

**1.2.** Incorporating ten conifer species into the Council's pest control program is essential for safeguarding our native ecosystems. The Council endeavours to

pursue a sustainable and pragmatic approach to wilding control through proactive steps and describing specific management strategies. This decision underscores the Council's dedication to restoring and protecting native ecosystems for future generations.

**2. Page 39. In the content between Table 6. & Table 7. The first sentence of the first paragraph:**

**2.1.** “.....occur in planted (historical) or wilding states, and all can cause adverse impacts on regional values.”

**2.2.** Where the word historical occurs, it should be replaced with the term legacy. This more accurately describes the pines that the occupier has inherited.

**2.3. With regard to the following statement. The last sentence of the first paragraph:**

“Generally, pest conifers need to be controlled/harvested wherever they occur in the region (including where they occur in plantations) as soon as it is practicable.”

The Trust emphasises the importance of acting "as soon as it is practicable." This presents an opportunity for the Council to assist occupiers with small privately owned forestry pine plantations, whether planted by the occupier or inherited. This service helps assess the value of the pines and provides options for the phased removal of those no longer financially viable. The Trust can help these landowners make informed decisions about their small forestry practices by leveraging established relationships, enabling them to benefit from this valuable support.

**3. Page 40.**

The Trust is concerned about the lack of specificity and inconsistencies in the first two paragraphs, as outlined below:

**1.1. Lack of specificity:** The example provided is a shelter belt of Douglas fir under 1 ha. in area, is limited in scope and does not cover all possible scenarios where introduced conifer species could contribute to the spread of wilding conifers. Providing more detailed and varied examples to illustrate different situations would be helpful.

**1.2. Inconsistencies:** The text mentions that certain terms may refer to specific conifer species based on the National Wilding Conifer Management Strategy. However, it does not provide consistent guidelines on when and how these terms should be applied. This inconsistency can lead to variations in interpretation and implementation.

#### 4. Page 40.

##### **The rationale for inclusion:**

We urge the Council to address the Trust's concerns to ensure the effective management of pest conifers and wilding conifers to protect the environment and the community's interests. The rationale provided for the inclusion of pest conifers and wilding conifers into the Tasman-Nelson RPMP includes the following limitations:

**4.1. Lack of comprehensive approach:** The rationale focuses on protecting specific areas and investments made to date, which will not address the broader issue of pest conifer management across the entire region.

**4.2. Potential conflict with neighbouring land occupiers:** While emphasising the need to manage external impacts on neighbouring occupiers, there will be challenges in ensuring cooperation and compliance, especially if disagreements over responsibilities or costs exist.

**4.3. Reliance on voluntary agreements:** While promoting negotiated agreements as an alternative to enforcing rules may offer flexibility, it could also result in inconsistent or ineffective management practices if parties do not reach agreements or do not adhere to them.

**4.4. Limited proactive measures:** While the rationale acknowledges the importance of early action in controlling wilding conifers, the focus on preventing new infestations needs to fully address existing infestations or proactive measures to prevent further spread.

**4.5. Potential gaps in policy alignment:** While seeking alignment with Marlborough District Council policy is mentioned, there will be challenges in ensuring consistency and coordination with other relevant stakeholders or jurisdictions.

## 5. Pages 40-44.

The Trust considers the content on pages 40 - 44 could be simplified to aid understanding with a Summary. For example:

### 5.1 Rationale for Inclusion Summary:

In the Tasman-Nelson RPMP, pest and wilding conifers are included for the first time to manage them across the region effectively. The primary objective is to safeguard the existing initiatives for controlling wilding conifers in designated operational zones. The regulations are designed to be in harmony with Marlborough District Council guidelines, practical, and adaptable, advocating for negotiated settlements as an alternative to rigid enforcement. The incorporation of radiata pine and Douglas fir is intended to tackle the forestry industry's duty to handle seed dispersal effects on adjacent properties.

### 5.2 Plan Rules Summary:

Two management programs are suggested: one that covers the entire region and another that targets specific operational zones. The regional regulations concentrate on clearing land, managing planted conifer forests, and handling pest agent conifers. Detailed guidelines are provided for various scenarios, including removing the land of pest conifers, responsibilities for planting forests to prevent wilding conifer spread, and managing pest agent conifers that impact neighbouring properties.

### 5.3 Explanation of the Rules Summary:

The rules detail specific measures for managing pest and wilding conifers based on property location and circumstances. These include a requirement to take action to control conifers when directed by council officers to safeguard biodiversity areas at risk from conifer spread. Additionally, forest occupiers are held accountable for preventing the spread of planted forestry seeds onto neighbouring properties, with a validation process for complaints. The rule concerning pest agent conifers aims to stop their establishment beyond property boundaries by managing potential seed sources. Overall, these rules ensure that control efforts are maintained to prevent the loss of benefits and protect land occupiers affected by wilding conifer infestations on adjacent properties.

## 6. Page 41 and 42.

### i. Region-wide programmes

The Trust has reviewed the three proposed rules, a, b. and c., for areas outside

of current operational management and has identified the following limitations:

**6.1. Ambiguous Definitions:** The rules use terms such as "clear land" and "pest agent conifer," leading to confusion among landowners and authorised personnel enforcing the rules. To ensure compliance, clear and specific definitions must be implemented. *We note, however, that the unexpected nature of where trees will spread will make it difficult to enforce these rules.*

**6.1.1 We recommend replacing the following content for rule a. with the following:**

From July 1, 2025, occupiers whose land is free or mostly free of wilding conifers are required to remove any such trees upon request by an authorised person. This measure aims to prevent the spread of wilding conifers in areas currently deemed clear of them. However, if the Management Agency and the landowner mutually agree on an alternative plan, they may proceed with that plan instead. Clear land is defined as areas with minimal presence of wilding conifers, although these trees have the potential to spread rapidly if seeds are dispersed there. While the spread of these trees is generally predictable, there are instances where they may unexpectedly establish in new areas. This regulation enables the Council to take proactive measures in vulnerable regions. Certain protected conifer trees identified in District Plans may be exempt from this requirement based on specific circumstances. *It is important to note that no explicit criteria are provided for what constitutes a low presence of wilding conifers.*

**6.1.2 We recommend replacing the following content for rule b. with the following:**

Starting on July 1, 2024, if you have a large conifer forest and wilding conifers from your forest spread to your neighbour's land within 200 meters, you will have to pay to remove them. This will happen if an authorised person receives a complaint from your neighbour and there is evidence that the wilding conifers came from your forest. *The Trust notes the absence of criteria to assess the strength of the evidence linking the spread of wilding conifers to the specified pest agent conifers.*

**6.1.3 We recommend replacing the following content for rule c. with the following:**

If your neighbour is getting rid of wilding conifers on their land and it's clear that these conifers came from pest agent conifers on your land, you will be told by an authorised person to get rid of those pest agent conifers. *The Trust reiterates the absence of criteria to assess the strength of the evidence linking the spread of wilding conifers to the specified pest agent conifers.*

In addition, the Trust has identified the following limitations to rules a. b. and c. for region-wide programmes and current operational areas under management.

- 6.2. Enforcement Dilemmas:** Enforcing the rules that require landowners to eradicate wilding conifers from their property will pose challenges due to the spread of wilding conifers being difficult to attribute to a specific source. This will lead to conflicts and delays in compliance.
- 6.3. Financial Strain:** The rules put the onus of controlling wilding conifers on occupiers, which will incur significant financial burdens, especially for those with larger properties, small forestry plantation areas or legacy pines. This could deter occupiers from complying with the regulations. Councils will need to mitigate the financial burden to ensure compliance.
- 6.4. Inconsistent Implementation:** The rules for region-wide programs and targeted operational areas may not be uniformly applied across the Tasman-Nelson region. This lack of consistency will lead to unequal treatment and varying levels of compliance. For effective implementation, rules will need to be consistently applied.
- 6.5. Uncertainty in Transitional Criteria:** The rules mention transitional criteria that have not been determined nationwide. The lack of clear guidelines for transitioning control responsibilities back to individual occupiers will create uncertainties and delays in managing wilding conifers. The government must provide clear guidelines to avoid uncertainty.
- 6.6. Limited Scope of Rules:** The rules primarily focus on controlling wilding conifers within specific operational areas and may not address potential spread from neighbouring regions or properties not covered under the proposed rules. This will limit the effectiveness of the management programs in preventing the spread of wilding pines. To prevent further spread, the government must expand the scope of the regulations.



## 7. Page 42.

### ii. Current operational areas under management

The limitations of wilding conifer control within the current operational areas managed in the Tasman-Nelson region can be summarised as follows:

- 7.1. Lack of Transitional Criteria:** The transitional criteria for transferring responsibility for ongoing control back to individual land occupiers have not been determined nationally. Clear guidelines will lead to certainty and mitigate challenges in effectively transitioning control efforts.
- 7.2. Dependency on Funding:** The current operational areas rely on continued funding to sustain control efforts until the problem is sufficiently addressed. If funding is not secured or sustained, it will impact the progress and effectiveness of control measures.
- 7.3. Negotiated Agreements:** The requirement for negotiated agreements between the Management Agency and occupiers as an alternative way to achieve control objectives will introduce complexities and potential delays in implementation, especially if consensus is not easily reached.
- 7.4. Offence for Breach:** Breaching the rules outlined for wilding conifer control is considered an offence under Section 154(N)19 of the Act. This strict enforcement approach will not foster cooperation and compliance among occupiers.
- 7.5. Monitoring and Enforcement Challenges:** Ensuring compliance with the rules, such as requiring occupiers to destroy pest/wilding conifers on their land within specified distances and under certain conditions, will pose monitoring and enforcement challenges for the Management Agency.
- 7.6. Unclear Enforcement Mechanisms:** While rules and procedures are defined, the effectiveness of enforcement mechanisms, such as the four-step process for addressing complaints related to planted forestry seed spread, may vary in practice and could lead to disputes or delays in resolving issues.
- 7.7. Reliance on Good Neighbour Rule:** The "good neighbour rule" requiring occupiers to act within 200m of an adjoining property boundary will rely on assumptions about seed dispersal distances and neighbour cooperation, which

various factors could impact on the ground. Generally, good neighbours do not complain about their neighbours, as this can lead to community disharmony. Expecting an occupier to complain to the council about their neighbour's pines is unrealistic.

**8. We bring to the council's attention that no funding is currently available to sustain the continued advancement of the THBGT Wilding Conifer Control Project.** So far, the program has received limited and preliminary maintenance control. Furthermore, not all Tākaka Hill landowners participated in the MPI Jobs For Nature Community Partnership-funded THBGT WP control project for 2020-23. Some landowners joined the project after the MPI JFN CP funding for WP control was allocated.

**8.1.** Regarding rule d. most Tākaka Hill occupiers have conifers used as a firewood supply. Other occupiers, such as Tasman Pine Forest Ltd., now a subsidiary of Sumitomo, have a legacy forest of Douglas fir trees planted in 1962. This land is situated adjacent to SH60 and the Waka Kotahi road reserve. However, logging the trees is not feasible due to erosion and slip control issues. This block of Douglas fir trees and other mature conifers in the road reserve plays a crucial role in stabilising parts of the Tākaka hill.

**8.2.** Waka Kotahi also has numerous mature conifers in their road reserve that stabilise parts of the hill. Occupiers bordering SH60 on Tākaka Hill have legacy conifers stabilising the road. Long-term planning to control these pines must include Waka Kotahi, TPF Ltd and occupiers.

**8.3.** Regarding the rule, e., see 7.7.

**Page 43.**

**9.** Regarding a breach of any previous rules under Section 154(N)19 of the Act.

The proposed partial review does not prioritise providing substantial support and incentives to encourage occupiers to act. Here are some recommendations for introducing an incentive-driven approach:

**9.1. Financial Incentives:** Consider offering financial support or incentives, such as grants, subsidies, or rates credits, to help offset the costs of controlling wilding conifers.

**9.2. Technical Support:** Provide occupiers with technical assistance, training, and access to expertise on effective control methods and best practices for

managing wilding pine infestations. The Trust can facilitate this support through Council funding as it has a social licence with Tākaka Hill landowners.

**9.3. Long-Term Planning Support:** Assist occupiers in developing long-term control plans and strategies for sustainable wilding pine management to help them implement effective control measures over time. The THBGT can offer this support with sufficient funding to deliver this work.

**9.4. Access to Resources:** Ensure that occupiers have access to the tools, equipment, and materials needed for wilding pine control, such as herbicides, machinery, and protective gear, to facilitate the implementation of control measures. The Trust has a community programme providing Metsulfuron with an electric drill and training for occupiers controlling wilding conifers on their property. However, capacity and capability remain a barrier for many landowners.

**9.5. Flexibility in Regulations:** Consider allowing flexibility in regulations and control requirements based on individual circumstances, such as land size, location, or conservation values, e.g. SNA's QEII Covenants, to make it easier for occupiers to comply with control measures.

## 10. Explanation of the Rules

The Trust is concerned that the rules outlined in this section may pose challenges for individuals without specialised knowledge or expertise in this field to grasp their implications fully.

**The limitations of Rule (a) are as follows:**

**10.1 Subjectivity and Interpretation:** The rule requires council officers to determine when pest or wilding conifers control is necessary based on factors such as the vulnerability of high-value biodiversity areas, feasibility, and cost-effectiveness. This subjective decision-making process could lead to inconsistencies in enforcement and interpretation of the rule.

**10.2 Lack of Clarity:** The rule lacks clear criteria or guidelines for determining when control is necessary, leading to confusion for occupiers and council officers on when action is required.

**10.3 Enforcement Challenges:** Enforcing the rule may be challenging, primarily if occupiers dispute the need for control actions as determined by council

officers. This could lead to delays or conflicts in implementing necessary control measures.

**10.4 Limited Scope:** The rule primarily focuses on protecting high-value biodiversity areas. It may not address the broader goal of wilding conifer management, such as controlling spread and pushing back infestations to source areas in the long term. This limited scope may not fully address the overall management needs of wilding conifers.

**11. The limitations of Rule (b) regarding 'planted forestry seed spread' include:**

**11.1 Compliance Challenges:** Enforcing and monitoring the rule could pose challenges, especially when there is a lack of scientifically validated methods to determine the spread of seeds.

**11.2 Subjectivity:** The opinion of an appropriate council officer is required for implementation, which could lead to inconsistencies in decision-making.

**11.3 Burden of Proof:** The burden of proof falls on the party making the complaint, which may be challenging to provide in some cases.

**11.4 Dispute Resolution:** The four-step process for resolving complaints may be time-consuming and may not always lead to a satisfactory resolution for all parties involved.

**11.5 Resource Allocation:** The rule may require significant resources from both the forest occupier and the adjoining occupier to address the issue of wilding spread, potentially leading to disputes over who should bear the costs.

**11.6 Lack of Clarity:** The rule does not provide specific guidelines on what constitutes 'reasonable attempts' to control wildings, which could lead to disputes over compliance.

**11.7 Limited Scope:** The rule only applies to conifer seedlings spread from planted forests onto immediately neighbouring land, which may not address all instances of wilding spread.

**12. The limitations of rule (c) regarding 'pest agent conifer control' include:**

**12.1 Subjectivity:** The rule relies on the opinion of an authorised person to determine if certain woodlots, shelterbelts, or individual trees are genuine

sources of seed spread. This subjectivity may lead to inconsistencies in decision-making.

**12.2 Complaint-Driven:** The rule is mainly activated when a neighbour files a complaint with the Management Agency. This complaint-driven process could result in conflicts between neighbours and foster a contentious environment.

**12.3 Enforcement Challenges:** Enforcing the rule may be challenging, especially if the neighbour accused of being a source of seed spread disputes the claim or cannot control the pest/wilding conifers effectively due to capacity, capability and cost.

**12.4 Resource Allocation:** Controlling pest/wilding conifers on property boundaries may require significant resources from landowners, which could lead to disputes over responsibilities and costs.

**12.5 Lack of Clarity:** The rule does not provide specific criteria for determining a source of seed spread, leaving room for interpretation and potential disagreements.

**12.6 Limited Scope:** The rule focuses on woodlots, shelterbelts, and individual trees under 1 hectare in size, which may not address all instances of pest/wilding conifer establishment across property boundaries.

**12.7 Compliance Challenges:** Occupiers may face challenges in proving that they are making genuine attempts to control pest/wilding conifers on their property, especially if the spread is due to factors beyond their control.

### **13. The limitations of Rule (d) are as follows:**

**13.1 Lack of clarity:** The rule may be challenging to interpret and apply due to its complex language and definitions. This could lead to confusion and inconsistencies in its implementation.

**13.2 Subjectivity:** Phrases like "as deemed valid by the Management Agency" leave room for subjective interpretation, which could result in inconsistent rule application across different cases or regions.

**13.3 Enforcement challenges:** Ensuring that occupiers comply with the requirement to maintain the gains of control work could be challenging,

especially if there are no clear guidelines or mechanisms for monitoring and enforcement.

**13.4 Retroactive nature:** The rule applies to work undertaken from 1 January 2016 onwards, which means that occupiers may be required to maintain gains from control work carried out several years ago. This will be impractical or burdensome for some occupiers.

**13.5 Scope limitations:** The rule may not cover all types of control work, as it specifically defines control as work funded through formalised programmes. This could exclude certain types of control efforts that are not part of such programmes.

#### **14. The limitations of Rule (e) are as follows:**

**14.1 Ambiguity in defining "reasonable steps":** The rule lacks clarity in defining what constitutes "reasonable steps" an occupier takes to control wilding conifer infestations on their property. This ambiguity could lead to disputes or inconsistencies in determining eligibility for protection under the rule.

**14.2 Subjectivity in assessing impact:** Determining whether an occupier is impacted by wilding conifer infestations on neighbouring property and to what extent may be subjective. This subjectivity could result in disagreements and challenges in enforcing the rule.

**14.3 Scientific basis limitation:** While the rule mentions that the 200m distance is based on scientific evidence regarding conifer seed dispersal, applying this distance as the sole criterion for determining the Crown's obligations may not account for site-specific factors or variations in seed dispersal patterns.

**14.4 Practical challenges:** Enforcing the rule based on a fixed distance of 200m from source trees may not always be practical or feasible, especially in cases where the infestations are spread over a larger area or where there are multiple sources of seed dispersal.

**14.5 Limited scope:** The rule protects occupiers impacted by wilding conifer infestations on neighbouring properties. It may not address broader issues related to wilding conifer management or control efforts beyond a certain distance.

**15. There are several limitations to Rules d-e.**

**15.1 Lack of clarity on the transition process:** The rules lack clear guidelines on how the transition of ongoing control from the Management Agency back to individual land occupiers will be managed. This lack of clarity will lead to confusion and potential disputes over responsibilities and timelines for ongoing control efforts.

**15.2 Uncertainty in determining the agreed level of work:** The rules mention the agreed level of work or control targets that need to be met before transitioning control back to individual land occupiers. However, there is ambiguity and subjectivity in determining the agreed level of work or control targets, which will result in disagreements or delays in the transition process.

**15.3 Inadequate support for individual land occupiers:** Transitioning control back to individual land occupiers will burden them to continue control efforts without sufficient resources, expertise, or support from the Management Agency. This will lead to challenges maintaining the gains achieved through previous control work.

**15.4 Lack of monitoring and evaluation:** The rules do not specify mechanisms for monitoring and evaluating the effectiveness of the transition process and the ongoing control efforts by individual occupiers. Without proper monitoring and evaluation, it will be difficult to assess the impact of the transition and address any issues that arise.

**15.5 Potential for gaps in control:** If the transition process is not effectively managed, there is a risk of gaps in control efforts, allowing wilding conifer infestations to spread or re-establish. This will undermine the overall effectiveness of control programs and lead to increased costs and efforts in the future.

The Trust recommends addressing these limitations, which requires explicit guidelines, communication, support, and monitoring mechanisms to ensure a smooth and effective transition of control responsibilities from the Management Agency to individual land occupiers.

**16. Page 44. Alternate options**

In the "Do nothing" option, wilding conifers are included in the relevant Regional Pest Management Plan (RPMP), as in other regions where work is carried out under the

National Programme. This inclusion is necessary to ensure that occupiers are compelled to maintain the gains achieved so far, as without such rules, there is no obligation on them to do so. However, this option does not offer insights or lessons learned from regions where wilding conifers are already included in the RPMP.

**17. Page 45. RPMP edits required.**

Option d. relies on external funding from regional and national sources, including the National Wilding Conifer Control Programme. This reliance on external funding sources introduces a risk to the continuity and effectiveness of the programme if funding levels fluctuate or fall short. Furthermore, the programme's success hinges on continued support from various government agencies, which may not be assured due to shifting priorities or budget limitations. Additionally, the programme's effectiveness will be constrained by the necessity for occupier participation and potential difficulties in coordinating efforts and resources among multiple stakeholders involved in managing pest and wilding conifers.

**Page 52. Section 6. Glossary**

The glossary fails to mention legacy pines, which makes it difficult to hold occupiers accountable for managing wilding conifers.

**18. Page 72.**

The cost-benefit summary of Pest Wilding conifers is in the table beginning on page 71. and in more detail in the National Policy Direction for Pest Management. The cost-benefit analysis document has several limitations that should be taken into consideration:

**Incomplete Consideration of Costs and Benefits:** While the analysis provides information on the costs and benefits of controlling wilding conifers, it does not capture all the potential costs and benefits associated with the proposed management options. The analysis needed to address additional environmental, social, or economic impacts.

**18.1 Uncertainty in Future Scenarios:** The analysis is based on projections and assumptions about future scenarios, such as the spread of wilding conifers and the effectiveness of control measures. There is inherent uncertainty in predicting these outcomes over a 50-year timeframe, which affects the accuracy of the results.

**18.2 Limited Scope of Analysis:** The analysis focuses primarily on the economic benefits of controlling wilding conifers, such as protecting productive land and biodiversity. It does not fully consider other important factors, such as the long-term ecological impacts of different management options or the potential cultural significance of the affected areas.



**18.3 Lack of Consideration for External Factors:** The analysis does not explicitly address how external factors, such as changes in climate or land use practices, could influence the effectiveness of the proposed management options. These factors could have significant implications for the costs and benefits of controlling wilding conifers.

**18.4 Incomplete Risk Assessment:** While the analysis identifies certain risks associated with each management option, it does not fully assess their likelihood and potential impact. A more comprehensive risk assessment could clarify the uncertainties and challenges in implementing the proposed control measures.

**18.5 Limited Stakeholder Engagement:** The analysis does not explicitly mention stakeholder engagement or consultation in decision-making. Engaging stakeholders, including occupiers, local communities, and iwi, would provide valuable insights and perspectives not captured in the analysis.



## **Wilding Pine Network Submission on the amendment to the Tasman-Nelson Regional Pest Management Plan 2019-2029 March 28<sup>th</sup>, 2024.**

We commend the Tasman District and Nelson City Councils for their collaborative efforts which are essential to manage environmental challenges such as weed pests which spread regardless of management or ownership boundaries. Effective long-term control can only be achieved by all parties working together.

The Wilding Pine Network is an NGO which works with around 25 iwi and community groups Aotearoa wide as well as agencies (local and regional authorities, government departments) to support and advocate for the management of wilding pines and conifers on private and public lands. To this end our submission on the amendment to the Tasman-Nelson Regional Pest Management Plan 2019-2029 is limited to wilding pine management. Please note that wilding pines in our context covers pines and conifers.

***We support the following three general statements from the Takaka Hill Biodiversity Trust (THBT) who have a long and impressive record of effective community based environmental management in a unique natural landscape and a pragmatic understanding of implementing effective management of pest species on the ground including wilding pines. We view their submission as particularly valuable because it comes from people who have experience on the ground locally.***

1. We share THBT's concerns "regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on landowners, and the need for clear transitional criteria". We support advocating for "clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual land occupiers.
2. We support THBT's suggestion for an "incentive-based approach to motivate land occupiers to act in controlling wilding pines, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations". The carrot before the stick approach is central to both securing and sustaining widespread community support but also to effectively educate and inform both the community and landowners of the risk that wilding pines and conifers present to biodiversity, productive and natural landscapes, and hydro-generation. The recently released Environment Canterbury Wilding Pine Control Handbook [Wilding pine control handbook | Environment Canterbury \(ecan.govt.nz\)](https://www.ecan.govt.nz/wilding-pine-control-handbook/) is a very good example of this approach.
3. THBT also emphasises the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding pines.

Wilding Pine Network – [www.wildingpinenetwork.org.nz](http://www.wildingpinenetwork.org.nz)

Email: [jo@wildingpinenetwork.org.nz](mailto:jo@wildingpinenetwork.org.nz)



We support this statement because it is important a) to have the 'stick' when the 'carrot' fails and b) because to get stakeholders on board they need to be fully informed and supported throughout the life cycle of wilding management which often requires repeat visits to achieve effective control.

WPN would also like to make 2 additional comments:

- I. ***We support the inclusion of a wider list of pine species that can become wildings if left unmanaged. We also support maintaining the gains of prior investment in control work and the introduction of the two new rules in the RPMP amendment*** but suggest that these need to go further. Limiting exacerbators to those with already planted forests is a reactive approach. Effective long term management is also about being proactive and dealing with known sources of issues before they occur. This is particularly important with species where seed is wind spread.

We have seen the serious and costly consequences of not being proactive with the degree of wilding pine spread from its primary source – legacy plantings for erosion control. Additionally, a more comprehensive and up-to-date approach is needed that considers the wilding pine issue across the whole Tasman region and not just protecting key areas and/or areas where control has been done to date.

In the 10 years covered by this plan, there will hopefully be many additions to the mapped areas that are controlled by nationally- and regionally funded initiatives, so up to date mapping will be needed. Similarly, the areas that have transitioned out of public-funded programmes will require collation in a live mapping system. We suggest that the two Councils do this through WCIS – the Wilding Conifer Information System which is the national database for all wilding pine/conifer control work. It may be that this is already the case with any nationally funded work undertaken in the region. It's a great resource to track work being undertaken as well as mapping new infestations with difference levels of access for the public and managers actively working as part of the national programme.

- II. ***Common language is important in national programmes to get buy in from all stakeholders.*** We respectfully suggest that some of the key terms in the RPMP used to describe and categorise species that can become wildings will cause confusion.

We recommend that the RPMP amendment should mirror the widely accepted terms used in the MPI led National Wilding Conifer Control Programme. For instance, Table 5 separates Douglas fir and radiata pine out from the other wilding pine and conifer species listed in the table as pest conifers – individual species.

Wilding Pine Network – [www.wildingpinenetwork.org.nz](http://www.wildingpinenetwork.org.nz)

Email: [jo@wildingpinenetwork.org.nz](mailto:jo@wildingpinenetwork.org.nz)



**Wilding Pine  
Network**

ADVOCACY  
—  
ADVICE  
—  
ACTION

Pest conifers should be renamed wilding conifers, and all species should be listed together. A simple table can then identify those that are valuable shelter and commercial timber species, those not planted anymore e.g. *Pinus contorta* and those that pose the greatest risk and why.

Additionally, the statement under wilding conifers ‘naturally occurring, not planted even with the qualifier of ‘wildings of the species’ is ambiguous – neither Douglas fir or Radiata pine occur naturally they are all a result of intentional planting or wilding spread.

Ka kite ano

Jo Ritchie

Coordinator – Wilding Pine Network

Wilding Pine Network – [www.wildingpinenetwork.org.nz](http://www.wildingpinenetwork.org.nz)

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## Project De-Vine Environmental Trust

FOSTERING NATIVE ECOSYSTEMS



### Project De-Vine Environmental Trust responses to the Tasman Nelson RPMP Partial Review Proposal 2023-24

Submission date: 23 April 2024.

Due to health reasons the person responsible for doing the submission was unable to complete the submission by the deadline. The submitter asks that the committee accept this late submission.

The table below summarises the proposed pests or pest groupings and the main reasons for their inclusion in the Tasman Nelson RPMP Partial Review Proposal 2023-24. **Submissions by Project De-Vine Environmental Trust are added after each proposed change in purple and bold.**

Proposed pest	Key reasons for proposed change
Blue passion flower	Emerging pest in the region. Eradication is the proposed outcome while infestations are relatively small. <b>SUPPORT THE CHANGE</b>
Boneseed (Nelson Port Hills only)	Refinement to the programme, requiring occupiers in a defined area on Nelson's Port Hills to undertake control on their properties. This will help maintain the integrity of the existing eradication programme in the rest of Tasman-Nelson. <b>SUPPORT THE CHANGE</b>
Conifers - pest conifers and wilding conifers	Maintaining the gains of prior investment in control work in current (named) operational areas and introducing two new rules: to keep vulnerable land that is clear of wildings clear and for exacerbators of wilding spread from planted forests to undertake control where seed spread is clearly occurring onto neighbouring land. <b>SUPPORT THE CHANGE. Project De-Vine ET appreciates the support of our wilding pine control programme in Golden Bay and hope the RPMP will spur other landowners onto wanting to control their wilding pines. We have already supplied mapping of all wilding pine sites in Golden Bay, visible from satellite images, to TDC's Biosecurity staff.</b>
Feral and stray cats	Increasing threats to indigenous wildlife (birds, fish and invertebrates) at sites of high ecological value - in Tasman (Abel Tasman National Park enclaves and St Arnaud township area) and in Nelson city (named publicly owned parks/reserves). <b>SUPPORT THE CHANGE. We appreciate the support towards our feral cat programme in our East Mohua Trapping Collective in Golden Bay and hope the RPMP will spur other landowners onto wanting to control the feral cats visiting their properties.</b>
Moth plant	Emerging pest in the region. Eradication is the proposed outcome while infestations are small. Aligns with Marlborough District Council (MDC) rules. <b>SUPPORT THE CHANGE</b>
Pampas (purple and common)	Opportunity to target pampas at two Golden Bay sites only, where controlling pampas is realistic due to its low density and distribution compared with most other places. <b>SUPPORT THE CHANGE. Project De-Vine ET has maintained a policy of controlling Pampas plants in Golden Bay, when found at manageable infestation levels, before and since Pampas was withdrawn from the RPMP. We have been maintaining Pampas control in the Motupipi River and tributaries catchment areas down to the sea in</b>

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## Project De-Vine Environmental Trust

### FOSTERING NATIVE ECOSYSTEMS



particular to this level. This area has and still is receiving multi-group support for willow control, planting and RPMP plant species control. Because of Golden Bay's proximity to two National Parks (NPs) and multiple DOC reserves (see attached maps showing that 47% and 79% of all private land in Golden Bay is within 0.5km and 1 km respectively of DOC reserves or NPs) and QEII covenants, Project De-Vine ET would like to see both Pampas species made control plants for all Golden Bay apart from forestry or ex-forestry blocks. Maybe imposing a good neighbour rule around sites of high infestation would slow its spread?

Sabella  
(Mediterranean fan  
worm)

Consistent with the MDC policy around fouling levels on craft in an aligned Top of the South approach. Includes new occupier / owner control and management obligations. **SUPPORT THE CHANGE**

Vietnamese parsley  
and water celery

Two emerging pests in the region where sustained control is proposed. The rules are considered together as the proposed management programme is the same. **SUPPORT THE CHANGE**

## Hearing Schedule for Submission Round: Regional Pest Management Plan Review

Monday 27 May 2024 Council Chambers, TDC, 189 Queen St, Richmond (12 Speakers)

Start Time	Duration	Speaker (Submission ID)	Topic
9:40 AM	(10 mins)	Waimea Inlet Forum working group (19803)	Feral and Stray Cats
9:50 AM	(10 mins)	David Melville on behalf of The Ornithological Society of NZ – Tasman-Nelson region (19748)	Feral and Stray Cats
10:00 AM	(10 mins)	Elaine Asquith on behalf of Tasman Environmental Trust (19747)	Feral and Stray Cats
10.10 AM	(10 mins)	Cynthia McConville on behalf of Forest and Bird Golden Bay Branch (19722)	Feral and Stray Cats
10:20 AM	(10 mins)	Sue Lindsay (19506)	Feral and Stray Cats
10:30 AM	(10 mins)	Elizabeth Bryant (19468, 19706)	Feral and Stray Cats and Wilding Conifers
10.40 AM – 5-minute break			
10.45 AM	(10 mins)	John Longden (19222, 19223)	Feral and Stray Cats and Wilding Conifers
10:55 AM	(10 mins)	Gillian Pollock (18696)	Feral and Stray Cats
11:05 AM	(10 mins)	PJ Kenney (19746)	Wilding Conifers
11:15 AM	(10 mins)	Charmaine Petereit on behalf of Tākaka Hill Biodiversity Group Trust (19775) <a href="#">via Zoom</a>	Wilding Conifers
11:25 AM	(10 mins)	Chris Golding on behalf of Department of Conservation (ID n/a)	All subject species
11:35 AM	(10mins)	Jo Field on behalf of One Forty One, PF Olsen and Tasman Pine Forests Ltd (19711, 19710, 19709, 19708, 19707, 19706)	Wilding Conifers

Response No:  
9Member ID:  
Date Submitted: Mar 27, 2024, 09:56 PM

Q1

Short Text

Name:

Waimea Inlet Forum working group

Q2

Email

Email:

Q3

Multi Choice

Which area/s mentioned in the proposal is your feedback about?

Q4

Long Text

What do you think about what is proposed for managing feral and stray cats?

The Waimea Inlet Forum supports the proposed partial review of the Regional Pest Management Plan. Our comments are about the proposed changes relating to feral cats.

We note that the Battle for the Banded Rail programme run through the Tasman Environmental Trust currently has 1,153 traps for ferrets, stoats, weasels and rats (ship and Norway) set along 58km of traplines around the Inlet, including in the areas covered by the Regional Pest Management Plan's site-led programme for Waimea Estuary.

Since 2016 The Tasman Environmental Trust has also run a Live and Let Live feral cat control programme around key habitat areas on the Inlet.

(Figure 1: Network of traps from Mapua to the Honest Lawyer)

We would like to see the area covered by the Plan's existing site-led programme for Feral cats, Brushtail possums, Ferrets, Stoats, Weasels and Rats (ship and Norway) at Waimea Estuary (Pearl Creek and Dominion Stream areas) increased, by extending two of the existing mapped areas and adding a sixth area.

- We ask that you extend the Matahura area to also include a) Dominion Flats on both sides of SH60 Te Mamaku Drive and b) Higgs Reserve.
- We ask that you extend the Research Orchard Road area further to the west.
- We ask that you add a new area, covering all of Bell Island and extending further east of it to include all of the Bell Island shellbank.

(Figure 2: Requested increase in area for Waimea Estuary site-led programme)

The purpose of this increase is to support the habitat restoration work that has been undertaken at Dominion Flats and Higgs Reserve and at Research Orchard Road, and to provide a better level of protection for the significant native habitat that is the Bell Island shellbank.

We trust that you will give consideration to making this amendment.

For the Waimea Inlet Forum working group.

P.S. We are also e-mailing this feedback, including the two Figures, to [biosecurity@tasman.govt.nz](mailto:biosecurity@tasman.govt.nz)

Q5

Multi Choice

Do you wish to speak a hearing in support of your submission?

Yes

Q6

Email

Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.



Response No:  
8

Member ID: 999

Date Submitted: Mar 26, 2024, 11:02 AM

Q1

Name:

Short Text

The Ornithological Society of New Zealand – Tasman-Nelson region

Q2

Email:

Email

Q3

Which area/s mentioned in the proposal is your feedback about?

Multi Choice

All sites

Q4

What do you think about what is proposed for managing feral and stray cats?

Long Text

We note that: 'Both Councils wish to step up feral and stray cat management at sites with important biodiversity values and further promote responsible companion cat ownership overall'. The Draft Plan states: 'Feral and stray cats ..... also carry parasites and toxoplasmosis, which causes abortions in sheep and illness in humans'. We would draw attention to the fact that toxoplasmosis can also affect native avifauna, including kererū (*Hemiphaga novaseelandiae*), kākā (*Nestor meridionalis*) and kiwi species (*Apteryx* spp.)

As such, disease risks from feral and stray cats should be considered together with predation impacts on native avifauna. The proposed expansion of site-led programmes to include both feral and stray cats in Tasman and Nelson should not only reduce predation pressure on avifauna, but also potentially limit the occurrence of *Toxoplasma gondii* in the environment.

Q5

Do you wish to speak a hearing in support of your submission?

Multi Choice

Yes

Q6

Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.

Email

Response No:  
7

Member ID:  
Date Submitted: Mar 26, 2024, 10:59 AM

Q1

Short Text

**Name:**  
Sky Davies - Tasman Environmental Trust

Q2

Email

**Email:**

Q3

Multi Choice

**Which area/s mentioned in the proposal is your feedback about?**  
All sites

Q4

Long Text

**What do you think about what is proposed for managing feral and stray cats?**  
TET supports measures to limit the presence of cats in important wildlife areas.

I would also like to add the Farmers for Whio areas in the Moueka Catchment to this plan. This includes subcatchments that border Kahurangi National park including Baton, Pearse, Graham, and Pokororo rivers. There is extensive trapping of stoats and ferrets in these areas to create safe habitat for whio. I am aware of some stray cat colonies and would like these to be controlled and for the number of companion cats to also be limited.

Q5

Multi Choice

**Do you wish to speak a hearing in support of your submission?**  
Yes

Q6

Email

**Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Response No:  
6

Member ID: 999

Date Submitted: Mar 25, 2024, 01:26 PM

Q1

**Name:**

Short Text

Forest and Bird Golden Bay Branch

Q2

**Email:**

Email

Q3

**Which area/s mentioned in the proposal is your feedback about?**

Multi Choice

All sites

Q4

**What do you think about what is proposed for managing feral and stray cats?**

Long Text

FERAL CATS: Feral cats are a serious predator of ground nesting birds. In Nikki McArthur's report "A Review of Management Issues and Options for Coastal Birds in the Tasman District" commissioned by Tasman District Council he states "feral cats are ubiquitous in coastal habitats in the Tasman District. This being the case, we consider it highly likely that ground nesting coastal birds in the Tasman District will be experiencing high feral cat depredation rates to those observed in similar habitats elsewhere in the country.

We are asking for feral cats to be included in the Plan in Golden Bay with the following rules:

1. Feral cats can be kill trapped at the seven shorebird sites in Golden Bay – Taupata, Pakawau, Collingwood, the Parawhakaoho, Onahau and Rototai/Motupipi.
2. Night shooting to be allowed on only four sites – Taupata, the Parawhakaoho, the Onahau Sandspit and Rototai/Motupipi on the Rototai Sandspit, the Rototai Shellbank and on the accreted land between the Motupipi Estuary and Pohara Beach. These sites are all well away from any residential properties.
3. Residents to be notified seven days prior to undertaking either kill trapping or night shooting. Dates advertised in the Public Notices section of the Golden Bay Weekly, on the Golden Bay Community Noticeboard Facebook page and through leaflet drops to residents requesting people keep their cats indoors between sunset and sunrise.

Q5

**Do you wish to speak a hearing in support of your submission?**

Multi Choice

Yes

Q6

**Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
5

Member ID:  
Date Submitted: Mar 19, 2024, 12:32 PM

- Q1** **Name:**  
Short Text Sue Lindsay
- Q2** **Email:**  
Email
- Q3** **Which area/s mentioned in the proposal is your feedback about?**  
Multi Choice All sites
- Q4** **What do you think about what is proposed for managing feral and stray cats?**  
Long Text I think feral cats need to be actively eliminated in all areas, not just those mentioned in the plan. Not only are they a terrible predator on our native birds and invertebrates, but they also carry and transmit toxoplasmosis, which is increasingly causing major stock losses for local farmers.
- Q5** **Do you wish to speak a hearing in support of your submission?**  
Multi Choice Yes
- Q6** **Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**  
Email

Response No:  
4

Member ID: 999  
Date Submitted: Mar 13, 2024, 04:17 PM

Q1  
Short Text

**Name:**  
Elizabeth Bryant

Q2  
Email

**Email:**

Q3  
Multi Choice

**Which area/s mentioned in the proposal is your feedback about?**  
All sites

Q4  
Long Text

**What do you think about what is proposed for managing feral and stray cats?**  
Native birds are starting to spill out to Motueka from surrounding trapped areas - which is wonderful. However, "companion "cats are hunting them down. They also use the estuary track to access the seashore and can be seen returning home for breakfast. This killing of native birds is especially distressing when you have planted natives as we have been encouraged to do. Across the world cats are being enclosed. There are some amazing large enclosures available. Scientific Papers are available showing that cats do well in these cages. In Victoria you cannot legally let your cat trespass on other people's property. Surely, we do not want to become so far behind!

I would like to ask that you make it mandatory to keep cats enclosed. Indeed, it would be good to at least start with owners when giving away kittens being responsible to give them only to people with such enclosures, cages, or electronic fencing, and also for it to be mandatory to keep you cat on your own property. No straying.

Q5  
Multi Choice

**Do you wish to speak a hearing in support of your submission?**  
Yes

Q6  
Email

**Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Response No:  
10

Member ID: 999  
Date Submitted: Mar 13, 2024, 04:10 PM

<b>Q1</b>	<b>Name:</b>
Short Text	Elizabeth Bryant
<b>Q2</b>	<b>Email:</b>
Email	
<b>Q3</b>	<b>Which area/s in the proposal is your feedback about?</b>
Multi Choice	General feedback
<b>Q4</b>	<b>What do you think about what is proposed for controlling pest and wilding conifers?</b>
Long Text	I am impressed with this plan and thoroughly endorse it. However, I would like to put forward a suggestion for you to consider. Pine slash - Pine slash is causing pain and economic hardship to both councils and individuals. With the recent court case against pollution up north- using an old English law- it may be that pine slash polluting the rivers may be prosecutable. In any case it is past time that forest harvesters are made responsible for this pollution. I am asking that they are made responsible for this polluting slash.
<b>Q5</b>	<b>Do you wish to speak a hearing in support of your submission?</b>
Multi Choice	Yes
<b>Q6</b>	<b>Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.</b>
Email	

Response No:  
2

Member ID:  
Date Submitted: Mar 05, 2024, 09:12 PM

- Q1** **Name:**  
Short Text John Longden
- Q2** **Email:**  
Email
- Q3** **Which area/s mentioned in the proposal is your feedback about?**  
Multi Choice
- Q4** **What do you think about what is proposed for managing feral and stray cats?**  
Long Text I support all the specific proposals , but would strongly support making these rules applicable throughout the whole of the district, both rural and urban. There is ample research on the ability of feral and domestic cats to travel long distances in a short time; attempting to raise the level of control in a small area surrounded by a vast pool of unmanaged cats is no more than tokenism.
- Q5** **Do you wish to speak a hearing in support of your submission?**  
Multi Choice Yes
- Q6** **Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**  
Email

Response No:  
11

Member ID: 1544  
Date Submitted: Mar 05, 2024, 09:24 PM

**Q1 Name:**

Short Text John Longden

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

I fully support the proposal in its entirety. I have seen and worked in wilding infestations in both Islands, and from sea level to above the bushline. Wildings threaten huge areas of the country . The threat from fire danger is of concern. but the greatest threat is the conversion of scrubland to sterile pine forest, and the invasion and effective destruction of tussocklands and alpine meadows by the hardier conifers such as lodgepole.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email



Response No:  
1

Member ID:  
Date Submitted: Feb 28, 2024, 03:11 PM

Q1  
Short Text

Name:  
Gillian Pollock

Q2  
Email

Email:

Q3  
Multi Choice

Which area/s mentioned in the proposal is your feedback about?  
All sites

Q4  
Long Text

What do you think about what is proposed for managing feral and stray cats?  
They should be neutered, registered and micro chipped. This is a start but cats know nothing of these things and will continue their wandering ways regardless. All other pet animals are fully controlled usually on the owner's property. Cats should be no different and must also be contained if we are to halt the decline in native species. Above all cats evolved as carnivores and are compelled to kill other animals.

Q5  
Multi Choice

Do you wish to speak a hearing in support of your submission?  
Yes

Q6  
Email

Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.

Response No:  
3Member ID:  
Date Submitted: Mar 26, 2024, 10:57 AM**Q1 Name:**

Short Text PJ Kenney

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

The system seems to be working pretty well as is. Problem "Operational Areas" are being identified and dealt with. The new catchment area groups have money, volunteers and enthusiasm to help identify, report, and deal with incursions. Forestry companies, small growers association (NZFFA), consultants, forest managers, Te Uru Rakau, TDC and wood suppliers all seem to communicate very well when necessary and are generally aware of prospective problem areas. Eric Appleton notes Scion has stated if the current ban on genetic engineering were amended they could produce a sterile douglas fir in 12 months. The current government has stated it will amend the law. There have been ideologies via political posturing and populist anti-pine sentiment that has confused issues but the general cooperative direction is positive. These changes may be throwing bureaucracy onto a problem that is solving itself and may cause divisiveness and disagreements in the future. .... More specifically: 1/ In your rationale for inclusion of new rules, "neighboring land occupiers should not be required to pay for or undertake pest control on their land through the actions or inactions of other parties". This implies someone else is responsible and should pay for eradication. This could lead to excessive over the fence responsibilities and disagreements. We have had more dramatic consequences with other noxious plants with no such draconian action. 2/ In your proposed rules for outside "Operational Areas" a. "Occupiers of land that is clear or relatively clear of pest or wilding conifer must destroy any pest or wilding conifer on their land ...". This final judgement is left to some "authorized person", however, both radiata and douglas fir are very valuable to farmers and small landowners in woodlots and shelter belts smaller than 1ha. There is now a promotional program around the country by NZFFA and Te Uru Rakau promoting alternative species and there should be a genetical modified sterile douglas fir very soon. Eric Appleton, who will be presenting at the local promotion of alternative and useful woodlot timbers, notes the serious effort by scientists and growers to improve the forest estate. The problem is being worked, let this relatively small problem die out. b. "Occupiers of planted conifer forests greater than 1ha ..... are liable for the costs for the removal of any wilding conifers on adjoining land within 200m of the planted forest property boundary.". This allows for undue responsibility on the plantation owner now and into the future as further development and/or land use philosophies collide. This is a severe disincentive to afforestation. These boundary discussions usually work out a local compromise and the threat of "going to law" seldom helps the situation.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
2Member ID:  
Date Submitted: Mar 27, 2024, 01:02 PM**Q1 Name:**

Short Text Tākaka Hill Biodiversity Group Trust

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text Tākaka Hill Biodiversity Group Trust (THBGT) Feedback on the Tasman Nelson RPMP Partial Review Proposal 2023-2024

**Summary**

The feedback provided by the Tākaka Hill Biodiversity Group Trust (THBGT) on the Tasman Nelson RPMP Partial Review Proposal highlights several key points. Including ten conifer species in the pest conifer control program is a positive step towards sustainable control and preservation of native ecosystems. The Trust emphasises the importance of proactive measures and specific management strategies in safeguarding the environment for future generations.

However, concerns are raised regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on occupiers, and the need for clear transitional criteria. The Trust advocates for clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual occupiers. Suggestions are also made for implementing an incentive-based approach to motivate occupiers to act in controlling wilding conifers, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations. The Trust underscores the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding conifers.

Overall, the Trust's feedback emphasises the need for a collaborative and well-defined approach to effectively manage pest and wilding conifers, protect biodiversity, and address the challenges faced by land occupiers in the Tākaka Hill area and the region.

Our feedback provides specific references to page numbers and headings in the T\_NRPM Partial Review Document for clarification.

1. Page 39. 4.5 Pest conifers and wilding conifers

1.1. The proposed inclusion of ten conifer species in the pest conifer control program marks a positive step forward. By categorising these species and detailing specific management strategies, the Council demonstrates proactive measures aimed at sustainable control and preservation of native ecosystems.

1.2. Incorporating ten conifer species into the Council's pest control program is essential for safeguarding our native ecosystems. The Council endeavours to pursue a sustainable and pragmatic approach to wilding control through proactive steps and describing specific management strategies. This decision underscores the Council's dedication to restoring and protecting native ecosystems for future generations.

2. Page 39. In the content between Table 6. & Table 7. The first sentence of the first paragraph:

2.1. ".....occur in planted (historical) or wilding states, and all can cause adverse impacts on regional values."

2.2. Where the word historical occurs, it should be replaced with the term legacy. This more accurately describes the pines that the occupier has inherited.

2.3. With regard to the following statement. The last sentence of the first paragraph:

"Generally, pest conifers need to be controlled/harvested wherever they occur in the region (including where they occur in plantations) as soon as it is practicable."

The Trust emphasises the importance of acting "as soon as it is practicable." This presents an opportunity for the Council to assist occupiers with small privately owned forestry pine plantations, whether planted by the occupier or inherited. This service helps assess the value of the pines and provides options for the phased removal of those no longer financially viable. The Trust can help these landowners make informed decisions about their small forestry practices by leveraging established relationships, enabling them to benefit from this valuable support.

3. Page 40.

The Trust is concerned about the lack of specificity and inconsistencies in the first two paragraphs, as outlined below:

1.1. Lack of specificity: The example provided is a shelter belt of Douglas fir under 1 ha. in area, is limited in scope and does not cover all possible scenarios where introduced conifer species could contribute to the spread of wilding conifers. Providing more detailed and varied examples to illustrate different situations would be helpful.

1.2. Inconsistencies: The text mentions that certain terms may refer to specific conifer species based on the National Wilding Conifer Management Strategy. However, it does not provide consistent guidelines on when and how these terms should be applied. This inconsistency can lead to variations in interpretation and implementation.

4. Page 40.

The rationale for inclusion:

We urge the Council to address the Trust's concerns to ensure the effective management of pest conifers and wilding conifers to protect the environment and the community's interests. The rationale provided for the inclusion of pest conifers and wilding conifers into the Tasman-Nelson RPMP includes the following limitations:

4.1. Lack of comprehensive approach: The rationale focuses on protecting specific areas and investments made to date, which will not address the broader issue of pest conifer management across the entire region.

4.2. Potential conflict with neighbouring land occupiers: While emphasising the need to manage external impacts on neighbouring occupiers, there will be challenges in ensuring cooperation and compliance, especially if disagreements over responsibilities or costs exist.

4.3. Reliance on voluntary agreements: While promoting negotiated agreements as an alternative to enforcing rules may offer flexibility, it could also result in inconsistent or ineffective management practices if parties do not reach agreements or do not adhere to them.

4.4. Limited proactive measures: While the rationale acknowledges the importance of early action in controlling wilding conifers, the focus on preventing new infestations needs to fully address existing infestations or proactive measures to prevent further spread.

4.5. Potential gaps in policy alignment: While seeking alignment with Marlborough District Council policy is mentioned, there will be challenges in ensuring consistency and coordination with other relevant stakeholders or jurisdictions.

5. Pages 40-44.

The Trust considers the content on pages 40 - 44 could be simplified to aid understanding with a Summary. For example:

5.1 Rationale for Inclusion Summary:

In the Tasman-Nelson RPMP, pest and wilding conifers are included for the first time to manage them across the region effectively. The primary objective is to safeguard the existing initiatives for controlling wilding conifers in designated operational zones. The regulations are designed to be in harmony with Marlborough District Council guidelines, practical, and adaptable, advocating for negotiated settlements as an alternative to rigid enforcement. The incorporation of radiata pine and Douglas fir is intended to tackle the forestry industry's duty to handle seed dispersal effects on adjacent properties.

5.2 Plan Rules Summary:

Two management programs are suggested: one that covers the entire region and another that targets specific operational zones. The regional regulations concentrate on clearing land, managing planted conifer forests, and handling pest agent conifers. Detailed guidelines are provided for various scenarios, including removing the land of pest conifers, responsibilities for planting forests to prevent wilding conifer spread, and managing pest agent conifers that impact neighbouring properties.

5.3 Explanation of the Rules Summary:

The rules detail specific measures for managing pest and wilding conifers based on property location and circumstances. These include a requirement to take action to control conifers when directed by council officers to safeguard biodiversity areas at risk from conifer spread. Additionally, forest occupiers are held accountable for preventing the spread of planted forestry seeds onto neighbouring properties, with a validation process for complaints. The Rule concerning pest agent conifers aims to stop their establishment beyond property boundaries by managing potential seed sources. Overall, these rules ensure that control efforts are maintained to prevent the loss of benefits and protect land occupiers affected by wilding conifer infestations on adjacent properties.

6. Page 41 and 42.

i. Region-wide programmes

The Trust has reviewed the three proposed rules, a, b. and c., for areas outside of current operational management and has identified the following limitations:

6.1. Ambiguous Definitions: The rules use terms such as "clear land" and "pest agent conifer," leading to confusion

among landowners and authorised personnel enforcing the rules. To ensure compliance, clear and specific definitions must be implemented. We note, however, that the unexpected nature of where trees will spread will make it difficult to enforce these rules.

6.1.1 We recommend replacing the following content for rule a. with the following:

From July 1, 2025, occupiers whose land is free or mostly free of wilding conifers are required to remove any such trees upon request by an authorised person. This measure aims to prevent the spread of wilding conifers in areas currently deemed clear of them. However, if the Management Agency and the landowner mutually agree on an alternative plan, they may proceed with that plan instead. Clear land is defined as areas with minimal presence of wilding conifers, although these trees have the potential to spread rapidly if seeds are dispersed there. While the spread of these trees is generally predictable, there are instances where they may unexpectedly establish in new areas. This regulation enables the Council to take proactive measures in vulnerable regions. Certain protected conifer trees identified in District Plans may be exempt from this requirement based on specific circumstances. It is important to note that no explicit criteria are provided for what constitutes a low presence of wilding conifers.

6.1.2 We recommend replacing the following content for Rule b. with the following:

Starting on July 1, 2024, if you have a large conifer forest and wilding conifers from your forest spread to your neighbour's land within 200 meters, you will have to pay to remove them. This will happen if an authorised person receives a complaint from your neighbour and there is evidence that the wilding conifers came from your forest. The Trust notes the absence of criteria to assess the strength of the evidence linking the spread of wilding conifers to the specified pest agent conifers.

6.1.3 We recommend replacing the following content for rule c. with the following:

If your neighbour is getting rid of wilding conifers on their land and it's clear that these conifers came from pest agent conifers on your land, you will be told by an authorised person to get rid of those pest agent conifers. The Trust reiterates the absence of criteria to assess the strength of the evidence linking the spread of wilding conifers to the specified pest agent conifers.

In addition, the Trust has identified the following limitations to rules a. b. and c. for region-wide programmes and current operational areas under management.

6.2. Enforcement Dilemmas: Enforcing the rules that require landowners to eradicate wilding conifers from their property will pose challenges due to the spread of wilding conifers being difficult to attribute to a specific source. This will lead to conflicts and delays in compliance.

6.3. Financial Strain: The rules put the onus of controlling wilding conifers on occupiers, which will incur significant financial burdens, especially for those with larger properties, small forestry plantation areas or legacy pines. This could deter occupiers from complying with the regulations. Councils will need to mitigate the financial burden to ensure compliance.

6.4. Inconsistent Implementation: The rules for region-wide programs and targeted operational areas may not be uniformly applied across the Tasman-Nelson region. This lack of consistency will lead to unequal treatment and varying levels of compliance. For effective implementation, rules will need to be consistently applied.

6.5. Uncertainty in Transitional Criteria: The rules mention transitional criteria that have not been determined nationwide. The lack of clear guidelines for transitioning control responsibilities back to individual occupiers will create uncertainties and delays in managing wilding conifers. The government must provide clear guidelines to avoid uncertainty.

6.6. Limited Scope of Rules: The rules primarily focus on controlling wilding conifers within specific operational areas and may not address potential spread from neighbouring regions or properties not covered under the proposed rules. This will limit the effectiveness of the management programs in preventing the spread of wilding pines. To prevent further spread, the government must expand the scope of the regulations.

7. Page 42.

ii. Current operational areas under management

The limitations of wilding conifer control within the current operational areas managed in the Tasman-Nelson region can be summarised as follows:

7.1. Lack of Transitional Criteria: The transitional criteria for transferring responsibility for ongoing control back to individual land occupiers have not been determined nationally. Clear guidelines will lead to certainty and mitigate challenges in effectively transitioning control efforts.

7.2. Dependency on Funding: The current operational areas rely on continued funding to sustain control efforts until the problem is sufficiently addressed. If funding is not secured or sustained, it will impact the progress and effectiveness of control measures.

7.3. Negotiated Agreements: The requirement for negotiated agreements between the Management Agency and

occupiers as an alternative way to achieve control objectives will introduce complexities and potential delays in implementation, especially if consensus is not easily reached.

7.4. Offence for Breach: Breaching the rules outlined for wilding conifer control is considered an offence under Section 154(N)19 of the Act. This strict enforcement approach will not foster cooperation and compliance among occupiers.

7.5. Monitoring and Enforcement Challenges: Ensuring compliance with the rules, such as requiring occupiers to destroy pest/wilding conifers on their land within specified distances and under certain conditions, will pose monitoring and enforcement challenges for the Management Agency.

7.6. Unclear Enforcement Mechanisms: While rules and procedures are defined, the effectiveness of enforcement mechanisms, such as the four-step process for addressing complaints related to planted forestry seed spread, may vary in practice and could lead to disputes or delays in resolving issues.

7.7. Reliance on Good Neighbour Rule: The "good neighbour rule" requiring occupiers to act within 200m of an adjoining property boundary will rely on assumptions about seed dispersal distances and neighbour cooperation, which various factors could impact on the ground. Generally, good neighbours do not complain about their neighbours, as this can lead to community disharmony. Expecting an occupier to complain to the Council about their neighbour's pines is unrealistic.

8. We bring to the Council's attention that no funding is currently available to sustain the continued advancement of the THBGT Wilding Conifer Control Project. So far, the program has received limited and preliminary maintenance control. Furthermore, not all Tākaka Hill landowners participated in the MPI Jobs For Nature Community Partnership-funded THBGT WP control project for 2020-23. Some landowners joined the project after the MPI JFN CP funding for WP control was allocated.

8.1. Regarding rule d. most Tākaka Hill occupiers have conifers used as a firewood supply. Other occupiers, such as Tasman Pine Forest Ltd., now a subsidiary of Sumitomo, have a legacy forest of Douglas fir trees planted in 1962. This land is situated adjacent to SH60 and the Waka Kotahi road reserve. However, logging the trees is not feasible due to erosion and slip control issues. This block of Douglas fir trees and other mature conifers in the road reserve plays a crucial role in stabilising parts of the Tākaka hill.

8.2. Waka Kotahi also has numerous mature conifers in their road reserve that stabilise parts of the hill. Occupiers bordering SH60 on Tākaka Hill have legacy conifers stabilising the road. Long-term planning to control these pines must include Waka Kotahi, TPF Ltd and occupiers.

8.3. Regarding the Rule, e., see 7.7.

Page 43.

9. Regarding a breach of any previous rules under Section 154(N)19 of the Act.

The proposed partial review does not prioritise providing substantial support and incentives to encourage occupiers to act. Here are some recommendations for introducing an incentive-driven approach:

9.1. Financial Incentives: Consider offering financial support or incentives, such as grants, subsidies, or rates credits, to help offset the costs of controlling wilding conifers.

9.2. Technical Support: Provide occupiers with technical assistance, training, and access to expertise on effective control methods and best practices for managing wilding pine infestations. The Trust can facilitate this support through Council funding as it has a social licence with Tākaka Hill landowners.

9.3. Long-Term Planning Support: Assist occupiers in developing long-term control plans and strategies for sustainable wilding pine management to help them implement effective control measures over time. The THBGT can offer this support with sufficient funding to deliver this work.

9.4. Access to Resources: Ensure that occupiers have access to the tools, equipment, and materials needed for wilding pine control, such as herbicides, machinery, and protective gear, to facilitate the implementation of control measures. The Trust has a community programme providing Metsulfuron with an electric drill and training for occupiers controlling wilding conifers on their property. However, capacity and capability remain a barrier for many landowners.

9.5. Flexibility in Regulations: Consider flexibility in regulations and control requirements based on individual circumstances, such as land size, location, or conservation values, e.g. SNA's QEII Covenants, to make it easier for occupiers to comply with control measures.

10. Explanation of the Rules

The Trust is concerned that the rules outlined in this section may pose challenges for individuals without specialised knowledge or expertise in this field to grasp their implications fully.

The limitations of Rule (a) are as follows:

10.1 Subjectivity and Interpretation: The Rule requires council officers to determine when pest or wilding conifers control is necessary based on factors such as the vulnerability of high-value biodiversity areas, feasibility, and cost-effectiveness. This subjective decision-making process could lead to inconsistencies in enforcement and interpretation of the Rule.

10.2 Lack of Clarity: The Rule lacks clear criteria or guidelines for determining when control is necessary, leading to confusion for occupiers and council officers on when action is required.

10.3 Enforcement Challenges: Enforcing the Rule may be challenging, primarily if occupiers dispute the need for control actions as determined by council officers. This could lead to delays or conflicts in implementing necessary control measures.

10.4 Limited Scope: The Rule primarily focuses on protecting high-value biodiversity areas. It may not address the broader goal of wilding conifer management, such as controlling spread and pushing back infestations to source areas in the long term. This limited scope may not fully address the overall management needs of wilding conifers.

11. The limitations of Rule (b) regarding 'planted forestry seed spread' include:

11.1 Compliance Challenges: Enforcing and monitoring the Rule could pose challenges, especially when there is a lack of scientifically validated methods to determine the spread of seeds.

11.2 Subjectivity: The opinion of an appropriate council officer is required for implementation, which could lead to inconsistencies in decision-making.

11.3 Burden of Proof: The burden of proof falls on the party making the complaint, which may be challenging to provide in some cases.

11.4 Dispute Resolution: The four-step process for resolving complaints may be time-consuming and may not always lead to a satisfactory resolution for all parties involved.

11.5 Resource Allocation: The Rule may require significant resources from both the forest occupier and the adjoining occupier to address the issue of wilding spread, potentially leading to disputes over who should bear the costs.

11.6 Lack of Clarity: The Rule does not provide specific guidelines on what constitutes 'reasonable attempts' to control wildings, which could lead to disputes over compliance.

11.7 Limited Scope: The Rule only applies to conifer seedlings spread from planted forests onto immediately neighbouring land, which may not address all instances of wilding spread.

12. The limitations of Rule (c) regarding 'pest agent conifer control' include:

12.1 Subjectivity: The Rule relies on the opinion of an authorised person to determine if certain woodlots, shelterbelts, or individual trees are genuine sources of seed spread. This subjectivity may lead to inconsistencies in decision-making.

12.2 Complaint-Driven: The Rule is mainly activated when a neighbour files a complaint with the Management Agency. This complaint-driven process could result in conflicts between neighbours and foster a contentious environment.

12.3 Enforcement Challenges: Enforcing the Rule may be challenging, especially if the neighbour accused of being a source of seed spread disputes the claim or cannot control the pest/wilding conifers effectively due to capacity, capability and cost.

12.4 Resource Allocation: Controlling pest/wilding conifers on property boundaries may require significant resources from landowners, which could lead to disputes over responsibilities and costs.

12.5 Lack of Clarity: The Rule does not provide specific criteria for determining a source of seed spread, leaving room for interpretation and potential disagreements.

12.6 Limited Scope: The Rule focuses on woodlots, shelterbelts, and individual trees under 1 hectare in size, which may not address all instances of pest/wilding conifer establishment across property boundaries.

12.7 Compliance Challenges: Occupiers may face challenges in proving that they are making genuine attempts to control pest/wilding conifers on their property, especially if the spread is due to factors beyond their control.

13. The limitations of Rule (d) are as follows:

13.1 Lack of clarity: The Rule may be challenging to interpret and apply due to its complex language and definitions. This could lead to confusion and inconsistencies in its implementation.

13.2 Subjectivity: Phrases like "as deemed valid by the Management Agency" leave room for subjective interpretation, which could result in inconsistent rule application across different cases or regions.

13.3 Enforcement challenges: Ensuring that occupiers comply with the requirement to maintain the gains of control work could be challenging, especially if there are no clear guidelines or mechanisms for monitoring and enforcement.

13.4 Retroactive nature: The Rule applies to work undertaken from 1 January 2016 onwards, which means that occupiers may be required to maintain gains from control work carried out several years ago. This will be impractical

or burdensome for some occupiers.

13.5 Scope limitations: The Rule may not cover all types of control work, as it specifically defines control as work funded through formalised programmes. This could exclude certain types of control efforts that are not part of such programmes.

14. The limitations of Rule (e) are as follows:

14.1 Ambiguity in defining "reasonable steps": The Rule lacks clarity in defining what constitutes "reasonable steps" an occupier takes to control wilding conifer infestations on their property. This ambiguity could lead to disputes or inconsistencies in determining eligibility for protection under the Rule.

14.2 Subjectivity in assessing impact: Determining whether an occupier is impacted by wilding conifer infestations on neighbouring property and to what extent may be subjective. This subjectivity could result in disagreements and challenges in enforcing the Rule.

14.3 Scientific basis limitation: While the Rule mentions that the 200m distance is based on scientific evidence regarding conifer seed dispersal, applying this distance as the sole criterion for determining the Crown's obligations may not account for site-specific factors or variations in seed dispersal patterns.

14.4 Practical challenges: Enforcing the Rule based on a fixed distance of 200m from source trees may not always be practical or feasible, especially in cases where the infestations are spread over a larger area or where there are multiple sources of seed dispersal.

14.5 Limited scope: The Rule protects occupiers impacted by wilding conifer infestations on neighbouring properties. It may not address broader issues related to wilding conifer management or control efforts beyond a certain distance.

15. There are several limitations to Rules d-e.

15.1 Lack of clarity on the transition process: The rules lack clear guidelines on how the transition of ongoing control from the Management Agency back to individual land occupiers will be managed. This lack of clarity will lead to confusion and potential disputes over responsibilities and timelines for ongoing control efforts.

15.2 Uncertainty in determining the agreed level of work: The rules mention the agreed level of work or control targets that need to be met before transitioning control back to individual land occupiers. However, there is ambiguity and subjectivity in determining the agreed level of work or control targets, which will result in disagreements or delays in the transition process.

15.3 Inadequate support for individual land occupiers: Transitioning control back to individual land occupiers will burden them to continue control efforts without sufficient resources, expertise, or support from the Management Agency. This will lead to challenges maintaining the gains achieved through previous control work.

15.4 Lack of monitoring and evaluation: The rules do not specify mechanisms for monitoring and evaluating the effectiveness of the transition process and the ongoing control efforts by individual occupiers. Without proper monitoring and evaluation, it will be difficult to assess the impact of the transition and address any issues that arise.

15.5 Potential for gaps in control: If the transition process is not effectively managed, there is a risk of gaps in control efforts, allowing wilding conifer infestations to spread or re-establish. This will undermine the overall effectiveness of control programs and lead to increased costs and efforts in the future.

The Trust recommends addressing these limitations, which requires explicit guidelines, communication, support, and monitoring mechanisms to ensure a smooth and effective transition of control responsibilities from the Management Agency to individual land occupiers.

16. Page 44. Alternate options

In the "Do nothing" option, wilding conifers are included in the relevant Regional Pest Management Plan (RPMP), as in other regions where work is carried out under the National Programme. This inclusion is necessary to ensure that occupiers are compelled to maintain the gains achieved so far, as without such rules, there is no obligation on them to do so. However, this option does not offer insights or lessons learned from regions where wilding conifers are already included in the RPMP.

17. Page 45. RPMP edits required.

Option d. relies on external funding from regional and national sources, including the National Wilding Conifer Control Programme. This reliance on external funding sources introduces a risk to the continuity and effectiveness of the programme if funding levels fluctuate or fall short. Furthermore, the programme's success hinges on continued support from various government agencies, which may not be assured due to shifting priorities or budget limitations. Additionally, the programme's effectiveness will be constrained by the necessity for occupier participation and potential difficulties in coordinating efforts and resources among multiple stakeholders involved in managing pest and wilding conifers.

Page 52. Section 6. Glossary

The glossary fails to mention legacy pines, which makes it difficult to hold occupiers accountable for managing



wilding conifers.

18. Page 72.

The cost-benefit summary of Pest Wilding conifers is in the table beginning on page 71. and in more detail in the National Policy Direction for Pest Management. The cost-benefit analysis document has several limitations that should be taken into consideration:

**Incomplete Consideration of Costs and Benefits:** While the analysis provides information on the costs and benefits of controlling wilding conifers, it does not capture all the potential costs and benefits associated with the proposed management options. The analysis needed to address additional environmental, social, or economic impacts.

**18.1 Uncertainty in Future Scenarios:** The analysis is based on projections and assumptions about future scenarios, such as the spread of wilding conifers and the effectiveness of control measures. There is inherent uncertainty in predicting these outcomes over a 50-year timeframe, which affects the accuracy of the results.

**18.2 Limited Scope of Analysis:** The analysis focuses primarily on the economic benefits of controlling wilding conifers, such as protecting productive land and biodiversity. It does not fully consider other important factors, such as the long-term ecological impacts of different management options or the potential cultural significance of the affected areas.

**18.3 Lack of Consideration for External Factors:** The analysis does not explicitly address how external factors, such as changes in climate or land use practices, could influence the effectiveness of the proposed management options. These factors could have significant implications for the costs and benefits of controlling wilding conifers.

**18.4 Incomplete Risk Assessment:** While the analysis identifies certain risks associated with each management option, it does not fully assess their likelihood and potential impact. A more comprehensive risk assessment could clarify the uncertainties and challenges in implementing the proposed control measures.

**18.5 Limited Stakeholder Engagement:** The analysis does not explicitly mention stakeholder engagement or consultation in decision-making. Engaging stakeholders, including occupiers, local communities, and iwi, would provide valuable insights and perspectives not captured in the analysis.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email



Department of Conservation  
*Te Papa Atawhai*

27 March 2024

DOC-7603656

The Chief Executive  
Tasman District Council  
Private Bag 4  
Richmond 7050

Dear Leonie

**Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029**

Please find enclosed a submission by the Director-General of Conservation in respect of the Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029.

Please contact Lionel Solly in the first instance if you wish to discuss any of the matters raised in the submission: phone 027 405 4459 or email [lsolly@doc.govt.nz](mailto:lsolly@doc.govt.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nic John'.

Nic John  
Acting Director Operations  
Northern South Island

**Department of Conservation *Te Papa Atawhai***  
Whakātu Nelson Office  
Private Bag 5, Nelson 7042  
[www.doc.govt.nz](http://www.doc.govt.nz)

**BIOSECURITY ACT 1993  
SUBMISSION ON A PARTIAL REVIEW OF THE TASMAN-NELSON REGIONAL PEST  
MANAGEMENT PLAN 2019-2029**

**TO:** Tasman District Council & Nelson City Council

**SUBMISSION ON:** A proposed Partial Review of the Tasman-Nelson Regional Pest Management Plan 2019-2029 (the Partial Review)

**NAME:** Director-General of Conservation

**ADDRESS:** Address for service:  
  
Department of Conservation  
Private Bag 5  
Nelson 7042  
  
Attn: Lionel Solly  
Telephone: 027 405 4459  
Email: lsolly@doc.govt.nz

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

1. I **support** the proposed amendments to the Regional Pest Management Plan (RPMP), subject to the specific comments set out in Attachment 1 to this submission.
2. I **seek** the following decisions from the Councils:
  - 2.1 That the proposed amendments to the RPMP are **approved**, subject to any specific changes requested in Attachment 1.
  - 2.2 That the amendments, additions and deletions sought in Attachment 1 are made.
  - 2.3 Alternative relief of like effect to that sought in 2.1 – 2.2 above, and any consequential amendments required as a result of such relief.

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

I wish to be heard in support of my submission and if others make a similar submission, I may consider presenting a joint case with them at the hearing.

**SIGNATURE**



27/03/2024

Nic John  
Acting Director, Operations, Northern South Island

Pursuant to delegated authority  
On behalf of Penny Nelson  
Director-General of Conservation

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

**ATTACHMENT 1: PARTIAL REVIEW OF THE TASMAN-NELSON REGIONAL PEST MANAGEMENT PLAN 2019-2029: SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION**

I **support** the proposed amendments to the RPMP, subject to the specific comments set out below. Unless otherwise stated, I support the proposed amendments on the basis that they are consistent with the purposes and principles of the Biosecurity Act 1993 and the National Policy Direction for Pest Management Plans and Programmes.

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
General comments	Overall, the Partial Review is aligned with the National Policy Direction (NPD) and guidance material.	
General comments: Strategic intent and alignment with other strategic initiatives	<p>Whilst the RPMP has a particular statutory function and purpose, and must be prepared in accordance with the Biosecurity Act and NPD, it is desirable that it also:</p> <ol style="list-style-type: none"> <li>1. has clear strategic intent and SMART objectives (specific, measurable, achievable, relevant and time-bound);</li> <li>2. supports current strategic (regional and cross-regional) initiatives and programs for the restoration, protection and enhancement of indigenous biodiversity; and</li> <li>3. supports initiatives and programs that are currently in development, e.g. under the Kotahitanga mō te Taiao Strategy; and other collaborative landscape-scale projects that may be progressed during the period of the RPMP.</li> </ol> <p>These matters are relevant to the RPMP as a whole and to the proposal to include new pests and policies through this Partial Review.</p> <p>Whilst to a large extent the strategic initiatives and programs in (2) and (3) will depend on voluntary collaboration between partner organisations, landowners and the wider community, the RPMP can provide further strategic direction and a regulatory backstop to support the delivery of programs on the ground.</p>	Addressed in submissions on specific sections of the Proposal, below
General comments: Pest Management Programmes	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.	Addressed in submissions on specific sections of the Proposal, below
Feral and stray cats	I <b>support</b> the intent of the proposal to include site-led programmes for feral and stray cats in/adjacent to sites with high biodiversity values, where those values include species that are vulnerable to predation by cats.	<b>Amend</b> pest agent cat rule (b) for the St Arnaud environs site-led programme as follows: No person shall deliberately release into the wild (e.g. <u>i.e.</u>

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
	<p>Information on the impacts of feral and stray cats on native biodiversity is summarised on DOC's website at <a href="https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/feral-cats/">https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/feral-cats/</a></p> <p>I <b>support</b> the proposed site-led programme and rules for feral and stray cats in the environs of St Arnaud.</p> <p>I would however suggest an amendment to the wording of pest agent rule (b), which currently reads <i>"No person shall deliberately release into the wild (e.g. Nelson Lakes National Park and environs) any companion cat from or living within the mapped area."</i> As this is worded, it would not be an offence for someone from <u>outside</u> the mapped area to release a companion cat within the mapped area; and this should be addressed. The wording used is also different to that used in the pest agent rule for the Nelson City site-led programme, which would create inconsistency within the RPMP.</p> <p>Consideration should also be given to making this pest agent rule a region-wide rule. However, I appreciate that this would require further analysis of benefits and costs and further consultation and may therefore be outside the scope of the current partial review.</p> <p>I <b>support in principle</b> the proposed site-led programme for feral and stray cats in the Abel Tasman National Park private enclaves. However, it is unclear why these areas are only subject to the 'reporting' rule and not also the 'pest agent' rules that apply in the St Arnaud environs site led programme (subject to the amendment noted above).</p> <p>I <b>support in principle</b> the proposed site-led programme for feral and stray cats in Nelson City. However, it is unclear what criteria have been used to identify 'high value sites' and I would question whether all of the sites currently identified have significant biodiversity values that would merit being included in the site led programme. I also note that some sites are close to residential areas and well within the roaming distance of companion cats, which would limit the effectiveness of controls on feral and stray cats.</p> <p>I am however satisfied that the water catchment reserves in the Maitai and Roding, the area around the Brook Waimārama Sanctuary, the Wakapuaka Sandflats and Nelson</p>	<p>Nelson Lakes National Park and environs) any companion <u>or stray</u> cat <del>from or living within the mapped area.</del></p> <p><b>Consider</b> making the pest agent rule as modified above a region-wide rule.</p> <p><b>Amend</b> the rule for Abel Tasman National Park private enclaves to include the following pest agent rules:</p> <ol style="list-style-type: none"> <li>a. No person shall keep, hold or harbour any companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.</li> <li>b. No person shall deliberately release into the wild (i.e. Abel Tasman National Park and environs) any companion or stray cat.</li> </ol> <p><b>Clarify</b> the criteria used for identifying 'high value sites' in Nelson City and re-assess how these have been applied to ensure that sites included within the programme are justified and satisfy cost-benefit requirements.</p> <p><b>Clarify</b> whether other areas have been assessed against the criteria for 'high value sites'.</p> <p><b>Clarify</b> the process for adding additional areas to the RPMP if/when they are assessed to be 'high value sites'.</p>

PLAN SECTION REF	MY SUBMISSION IS THAT	AMENDMENTS (OR OTHER ACTIONS) SOUGHT
	<p>Boulder Bank should be included in the site led programme for Nelson City.</p> <p>Depending on the criteria used, there are likely to be other areas within the Nelson-Tasman region that would qualify as ‘high value sites’. It is unclear whether other sites were considered for inclusion in the partial review of the RPMP and, if so, why they were discounted.</p>	
Pest and wilding conifers	<p>I <b>support</b> rules a, b, c and e.</p> <p>In relation to rule a (the clear land rule) the proposal states that ‘clear land’ is defined as <i>“parts of the region that are currently clear, (or infestations are at a low or very low density), but highly susceptible to wilding conifer spread if a seed source becomes established.”</i> The proposal also notes that ‘highly susceptible areas’ are currently undetermined and unmapped; and that there is an intention to map these areas within a year of RPMP amendments being adopted. Landowners and occupiers do require more certainty around the identification of land that is ‘highly susceptible to wilding conifer spread’ and I would therefore encourage to the Councils to make this a priority. It may not be possible to map all areas that are highly susceptible, based on current knowledge, and inclusion of criteria or descriptive text on the process for identifying highly susceptible land should also be included.</p> <p>I <b>support in principle</b> rule d, which requires occupiers to destroy any pest/wilding conifers on their land where they are located within a defined operational area that has received prior control. However, I have concerns that the rule might have unintended consequences for land managers. In particular, it is dependent on the transition from nationally/regionally funded control programmes to individual land managers, and the proposal notes that transitional criteria have yet to be determined nationally. It is conceivable that restricted funding (e.g. from NWCCP) will mean that control programmes will not fully ‘break the back of each problem’; and that, during the life of this plan, a certain (probably low) level of coning conifers will need to be accepted over some of the mapped areas. In this context, the ‘agreed level of work’ and ‘agreed control targets’ used to facilitate transition will need to be very carefully worded, and not open for interpretation by the Management Agency.</p>	<p><b>In relation to rule a, commit</b> to mapping or otherwise defining criteria for identifying areas that are ‘highly susceptible to wilding conifer spread’, within 12 months of the RPMP amendments being adopted, and make this information available on the Councils’ websites.</p> <p><b>In relation to rule d, clarify</b> the ‘agreed level of work’ and ‘agreed control targets’ used to facilitate transition from nationally/regionally funded control programmes to individual land managers.</p>

Response No:  
9

Member ID: 999

Date Submitted: Mar 24, 2024, 01:54 PM

**Q1 Name:**

Short Text

One Forty One, PF Olsen and Tasman Pine Forests Ltd

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice

Mt Richmond Wilding Conifer Management Unit  
 Tākaka Hill – Tākaka Hill Biodiversity Group Trust  
 Abel Tasman National Park (ATNP) - Project Janszoon  
 Golden Bay (including the ATNP Halo) - Project De-Vine Environmental Trust  
 General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

Description and effects. We object to the description. It is emotive, and the matters are expressed in absolute terms and not based on fact in this region. This description is a cut and paste from national documents. There is no assessment of the issues for this region. There is no evidence that such conifers adversely impact recreation in the region. There is no evidence showing soil and soil fauna have been adversely altered in this region, that pastoral farming availability has been reduced, that water availability has been impacted and that such conifers create wildfire risks over and above any other vegetation in the region.

In the Sapere Report (2022), with regard to availability of water, this region does not include a hydro catchment that may be impacted. There has been no assessment of the wildfire risk in this region and the same report advises that wildfires fuelled by wilding conifers are rare and require further research.

Relief sought

Delete the description or rewrite to take into account known regional impacts.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice

Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
8

Member ID: 999

Date Submitted: Mar 24, 2024, 01:56 PM

**Q1 Name:**

Short Text One Forty One, PF Olsen and Tasman Pine Forests Ltd

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**Multi Choice Mt Richmond Wilding Conifer Management Unit  
Tākaka Hill – Tākaka Hill Biodiversity Group Trust  
Abel Tasman National Park (ATNP) - Project Janszoon  
Golden Bay (including the ATNP Halo) - Project De-Vine Environmental Trust  
General feedback**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text Rule a. We object to this and the uncertainty provided by the definition of “clear land”. Reasons for objection is: - the Review Proposal in foot note 9 page 41 admits that “low” or “very low density” and “susceptible areas” are not defined, not mapped and that more work is required to be undertaken. This lack of defining means that the impact of the rule on any occupier is uncertain and cost benefits cannot be calculated.

As non-compliance with rules can lead to prosecutions under the Biosecurity Act 1993 the extent of the application of a rule must be certain and not one which allows an authorised person to have the discretion to decide what is a susceptible area.

The second to last sentence in the explanation of rule a. appears to indicate that the concept of susceptible areas could be any land, such as, production land. It is not clear what can be considered as production land as the New Zealand Planning Standards define rural production as including land not just for agriculture but for forestry.

Relief sought

The rule is deleted and reconsidered when the relevant work on the definition is undertaken, and any susceptible area is mapped.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email



Response No:  
7

Member ID: 999

Date Submitted: Mar 24, 2024, 01:57 PM

Q1

**Name:**

Short Text

One Forty One, PF Olsen and Tasman Pine Forests Ltd

Q2

**Email:**

Email

Q3

**Which area/s in the proposal is your feedback about?**

Multi Choice

Q4

**What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

Rule b. We object to this rule, explanation and process. Reasons for objection include:

The rule makes a forest owner liable for legacy trees, trees that for whatever reason adjacent landowners have chosen over the years not to destroy. The rule would capture trees of any age and trees that may have eventuated from wildings that a landowner has chosen not to deal with. So, any existing wilding within the Dept of Conservation estate, within State and Council Road corridors would be captured by this rule.

Retrospective application for liability for wildings is unreasonable. Forest owners have had no legislative ability to control how adjacent landowners have managed any wildings on their property.

There is no definition of what a "valid" complaint would be. The information and data requirements of what would be valid have not been included.

The explanation is confusing as to the date/age of the trees that fall within the scope of this rule. Is the forest owner liable for any wilding spread that occurs from 1 July 2024? The explanation only confuses the application of this rule.

The four-step proposal dealing with legacy trees is unreasonable in that it is heavily in favour of any complainant. The adjacent landowner does not have to reach any agreement as they know that if no agreement is reached then the forest owner is liable. The process can lead to unreasonable behaviour. This is an unfair process and if the right of appeal cannot be included then there should be provision for an arbitrator to assist in the development of an agreement and ability for unreasonable demands to be discounted. The rule should not apply to trees existing at 1 July 2024.

Q5

**Do you wish to speak a hearing in support of your submission?**

Multi Choice

Yes

Q6

**Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
6

Member ID: 999  
Date Submitted: Mar 24, 2024, 01:58 PM

**Q1 Name:**

Short Text One Forty One, PF Olsen and Tasman Pine Forests Ltd

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice Mt Richmond Wilding Conifer Management Unit  
Tākaka Hill – Tākaka Hill Biodiversity Group Trust  
Abel Tasman National Park (ATNP) - Project Janszoon  
Golden Bay (including the ATNP Halo) - Project De-Vine Environmental Trust  
General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text Rules d and e. We object to the inaccurate mapping under these rules. Although we do not disagree with the rule, it is subject to mapping quality. The mapping we have seen to date is of a low standard and incorporates some plantation forest owners' productive crop. If the rule is enforced based on poor mapping it could illogically require forest owners to remove significant amounts of tree crop on their land or force the forest owner and Management Agency to negotiate an agreement.

Relief sought

Over the duration of the Regional Pest Management Plan, with regard to the operational areas under current management set out in these rules that have been mapped in agreement with affected landowners (as shown in Maps 4.1, 4.2 and 4.31 and 4.32 in the Review Proposal) and prior to cone bearing.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
5

Member ID: 999

Date Submitted: Mar 24, 2024, 02:00 PM

**Q1 Name:**

Short Text

One Forty One, PF Olsen and Tasman Pine Forests Ltd

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice

Mt Richmond Wilding Conifer Management Unit  
 Tākaka Hill – Tākaka Hill Biodiversity Group Trust  
 Abel Tasman National Park (ATNP) - Project Janszoon  
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 General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

Alternate options. The proposed rules have not considered the changes in the regulation of forest owners with regard to the spread of wilding conifers. We object to the statement that the rules are necessary because government policy is encouraging an increase in afforestation in the region.

While government policy provides for tree owners to enter into the ETS programme the tinkering with this programme, the excessive costs for being with the project (\$30/ha/per year) belie any concept that government policy is leading to more afforestation in the Region.

The national planting figures for the region indicate that that there has, in the last five years, been very little increase to plantation forests in the region.

The NES-PF and now NES-CF has major controls on consideration of the spread of wilding conifers. Regulation 11 requires an assessment using the wilding risk calculator of any conifer to be planted. The calculation must be made 8 months in advance of planting and provided to you, the councils. Under regulation 79(a) wilding risk calculations must be undertaken for any replanting and completed no more than 8 months prior to the replant.

If a score exceeds a wilding tree risk calculator of 12 or more one cannot replant as a permitted activity, instead, one must apply for a resource consent. Under the 2023 changes to the NES-CF, afforestation and replanting management plans must also be undertaken and provided to the Council on request. We know of no afforestation or replanting of Douglas fir in the region since the introduction of the NES-PF in 2018.

While this Review Proposal is undertaken under the Biosecurity Act 1993, we consider that the impact of the NES-CF on the risk management of the spread of conifers is applicable.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice

Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email

Response No:  
4

Submission ID: 12711

Member ID: 999

Date Submitted: Mar 24, 2024, 02:00 PM

**Q1 Name:**

Short Text

One Forty One, PF Olsen and Tasman Pine Forests Ltd

**Q2 Email:**

Email

**Q3 Which area/s in the proposal is your feedback about?**

Multi Choice

Mt Richmond Wilding Conifer Management Unit  
 Tākaka Hill – Tākaka Hill Biodiversity Group Trust  
 Abel Tasman National Park (ATNP) - Project Janszoon  
 Golden Bay (including the ATNP Halo) - Project De-Vine Environmental Trust  
 General feedback

**Q4 What do you think about what is proposed for controlling pest and wilding conifers?**

Long Text

Cost benefit analysis. With regard to Rule b there has been no cost benefit analysis undertaken for this region. The Sapere Report (2022) was undertaken regarding removal of existing infestations and included infestations of all conifers, not ones related to Douglas Fir and Pinus radiata. It is a national report and the Councils have not taken its costings and assessed it against the regions' characteristics and Rule b. The Sapere report assists in supporting Rule a. The Sapere Report identified impacts on specially identified cultural sites. There has not been any identification of such sites under risk in this region. While irrigation is undertaken in the regions there has been no assessment of the risk of availability of water from existing infestations. The Sapere Report identifies the benefits of added further priority areas for control, but the Review Proposal and the cost benefit analysis does not advise of any such areas in the region. Accordingly, we cannot properly assess the relevance of the Sapere Report costs and benefits to this region and in particular the applicability of Rule b to assisting in the controlling of existing infestations.

**Q5 Do you wish to speak a hearing in support of your submission?**

Multi Choice

Yes

**Q6 Please give us a contact email address or phone number and we'll be in touch to arrange a time for you to speak.**

Email