

Proposed Hawke's Bay Regional Pest Management Plan 2018-2038

Staff Recommendations Report

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Purpose of report

By Minute 1, dated 18 May 2018, the Hearing Panel directed Council Staff to prepare a Staff Report on the Proposal for the Hawke's Bay Regional Pest Management Plan (PRPMP), containing:

- A summary of the key themes raised in submissions.
- A summary of the submissions received on the Proposal highlighting key issues raised in submissions, including staff recommendations in response to each submission.
- An assessment against consultation requirements in section 72 of the BSA.

This report addresses the first two matters in the narrative of the report, together with some further context for some issues raised in submissions. The assessment against consultation requirements in section 72 of the BSA, along with Minute 1, can be found on on Hawke's Bay Regional Council's website: <https://www.hbrc.govt.nz/services/pest-control/biosecurity/pest-management-plan-review/>

Introduction

The Proposed Regional Pest Management Plan (PRPMP) was publicly notified for feedback on 2 February 2018 for a period of six weeks, closing the 16 March 2018. A total of 54 submissions were received addressing a range of matters. Staff were appreciative of the largely positive and constructive comments and suggestions for improving the PRPMP and pest management outcomes for Hawke's Bay.

The key themes raised in the submissions included:

- requests for additional pests to be included in the RPMP;
- general comments on the structure or content of the PRPMP;
- comments specific to pest provisions outlined in the PRPMP; and
- specific comments on possums, pampas;

Hawke's Bay Regional Councils Biosecurity approach

Since the development of Councils first Pest Management Strategy in July 1996, significant benefits have accrued to the region's economy from pest plant and animal control. Although over the past 15 years approximately 80% of Council's biosecurity budget has been spent on pests affecting agricultural production, there have been significant biodiversity gains arising from the delivery of these programmes. It is important to recognise these gains, including the Possum Control Area (PCA) programme, which now spans over 700,000ha of the region. The response from releasing our native species from predation and browsing pressures has been noticed across the region, with increased numbers of tui and bellbird, expansion of whitehead colonies and flowering and fruiting of tree species. The Biosecurity team is now working with over 70 community groups and private land owners on biodiversity focussed pest control programmes, including the management of stoats, rodents, feral cats, feral goats, purple ragwort, boneseed, cathedral bell, old man's beard, banana passionfruit, and blue passion flower to mention a few. The team works in close partnership with organisations including the Department of Conservation, QEII, Forest and Bird, and Fish and Game.

Changes to the Biosecurity Act in 2012, together with the National Policy Direction for Pest Management issued in 2015 (NPD), introduced new requirements regarding the content of regional pest management plans and process of their development. The RPMP will replace the Strategy as the

regulatory component of the wider biosecurity programme. The RPMP is one tool of many in achieving smarter pest management in Hawke's Bay. The wider biosecurity programme also includes non-regulatory methods, including incursion response, working with groups and agencies, Predator Free Hawke's Bay, participation in research projects, pathway management (including on-farm-biosecurity), project and community support, and biological control projects.

Summary of consultation

This document summarises consultation during the development of the Proposed Hawke's Bay Regional Pest Management Plan ("the Proposal") as at 5 June 2018.

Consultation during development of Proposal

In June 2017 Hawke's Bay Regional Council released a discussion document on the future of pest management in Hawke's Bay. The purpose of the discussion document was to seek the community's views on the best approaches in a new regional pest management plan.

To encourage public input, the document focussed on key pests and provided several mechanisms for submitting feedback, including via phone, email, letter, hard copy submission form or online submission form. A total of 98 submissions were received with the majority received by the online submission form. The release of the discussion document was advertised via the Hawke's Bay Regional Council website and Facebook page, a YouTube video, an article in the Hawke's Bay Regional Council 'Our Place' newsletter, articles in the Hawke's Bay Today, and 4,500 letters sent to stakeholders. An email was also sent to key stakeholders, including the Department of Conservation, Federated Farmers, OSPRI, TBFree Committee, Horticultural sector, Forestry sector, Ministry for Primary Industries, Fish & Game, Forest & Bird, Hawke's Bay Marine group, QEII and Hawke's Bay Regional Council contractors.

The feedback from this document helped shape the Proposed Regional Pest Management Plan and gave Hawke's Bay Regional Council confidence the Plan is heading in the right direction.

Ministers

Hawke's Bay Regional Council met with representatives from the Department of Conservation (DOC) at various stages during the consultation process. In addition to general consultation around the process for the review and a high level structure of the Proposal, other discussion points were raised regarding establishing pests of mutual interest with DOC such as the management of feral goats, possums, old man's beard and predator control.

Hawke's Bay Regional Council attended a workshop run by the Ministry for Primary Industries (MPI) to discuss requirements for the National Policy Direction.

Local authorities

Hawke's Bay Regional Council has consulted with neighbouring councils in relation to the process for the regional pest management plan review. Key topics discussed were:

- Roll out of wide-scale predator control and associated rules;
- Adding a GNR for feral goats to ecological areas and plantings;
- Inclusion of yellow bristle grass within the plan;
- Inclusion of a marine pests programme;

Tangata Whenua

A Biosecurity Working Party, consisting of three councillors and three appointed members of the Regional Planning Committee, was formed. The Working Party was responsible for considering and providing recommendations to staff on the Regional Pest Management Plan review process and key issues including guidance on the development of the discussion document, Proposed Plan and advice on how to best consult with Māori.

The Biosecurity team presented both the discussion document and the Proposed Plan to the Māori Committee, and updated them on key items of interest and the process of engagement.

Three emails were sent specifically to the Regional Policy Committee, Māori Committee and Post Settlement Government Entities, one advertising the release of the discussion document for public consultation, one offering to meet with interested parties in person to discuss the Regional Pest Management Plan review and a final email advertising the release of the Proposed Plan for public consultation.

This third email resulted in interest in the Proposed Plan and as a result a hui was held at Peak House, Te Mata Peak on 5 March where Hawke's Bay Regional Council staff attended and presented. This hui was organised by Tangata Whenua Hawke's Bay.

Other persons

Hawke's Bay Regional Council has held meetings with key industry and interest groups such as Hawke's Bay horticultural industry, Federated Farmers, Port of Napier, New Zealand Inshore Fisheries, Hawke's Bay TB Free committee, pest control contractors and interested parties in pampas control. There is some overlap with landowner and community engagement.

Public notification

The Proposed Hawke's Bay Regional Council Pest Management Plan 2018-2038 was publically notified on 2 February 2018. Submissions closed on 16 March 2018.

Key themes arising in submissions

There was overall general support for the following:

- a. Proactive approach to stop new pests becoming established in the region through the Exclusion programme, including the inclusion of a marine pest programme.
- b. Regional benefits from reducing pest spread, e.g. Chilean Needle Grass programme, boundary control pest plants;
- c. Inclusion of Good Neighbour Rules;
- d. Rules to provide protection for pest control investments e.g. possum control and eradication, predator control;
- e. Support for Eradication pests;

Many submitters commented that they were supportive of some element(s) of the PRPMP, and very few stated outright opposition. Submitters commented on operational and implementation activities, including the way the rules are enforced, the method of undertaking pest control (for example, the use of poisons) and the use of biological control. The inclusion of Good Neighbour Rules were supported, with Crown agencies (MPI) and the Department of Conservation(DOC) recommending changes to ensure these meet specific requirements in the NPD.

Some of the key issues/concerns raised were:

- a. Maintaining current programme commitments, not reducing efforts and losing gains made;
- b. The transport of pest plants through gravel extraction / use in relation to roading;
- c. How the rules will be implemented for the marine biosecurity programme;
- d. Consultation with tangata whenua is not considered adequate;
- e. Proposed feral deer and goat management is considered not adequate and requires stronger programme objectives and rules within the Plan;
- f. Alignment with the Wilding Conifer Management Plan is sought, as well as the inclusion of *Pinus radiata*.

It is important to note that once an organism is included in a programme in a RPMP, it has pest status and cannot be propagated, communicated or sold (please refer Sections 52 and 53 of the Biosecurity Act). These controls can pose a problem if the organism is also being used for a commercial purpose.

Requests for additional pests

A number of additional organisms were suggested as pests for inclusion in the proposed Plan, including over 40 plant species. These species suggested are primarily environmental weeds. Hedgehogs were the most common species mentioned, followed by pampas, mothplant and wilding pine.

For new pests to be considered for inclusion in the RPMP, there are a number of factors to consider:

- funding arrangements, whether this could be managed outside the RPMP with joint partner funding;
- threat and the impact of the organism;
- “pestiness” of the organism;
- incidence, how widespread a species may be, how prone Hawke’s Bay is to the organism;
- tools that are available for control;
- objective for management of the organism and whether this is achievable;
- principal measures, and how the objective will be achieved;
- rules, if there are actions occupiers could take – depending on tools and skills required;
- cost benefit analysis.

Staff have recommended that hedgehogs are added to the Plan as a site specific pest and the following organisms be added to the Organisms of Interest list, as they warrant further surveillance and may be considered for site-led or non-regulatory programmes in the future:

1. Bishops pine
2. Corsican pine
3. Darwin’s ant
4. Douglas fir
5. European larch
6. Hare
7. Magpie
8. Maritime pine
9. Pampas
10. Ponderosa pine

Good Neighbour Rules

Submitters raised concerns regarding Crown agencies and the need to contribute more to pest control and to being good neighbours through addition of more Good Neighbour Rules. Good Neighbour Rules (GNRs) are a new mechanism available to regional councils, through the National Policy Direction (2015). This is the first time that regional councils have been able to require the Crown to comply with pest management rules designed to address the effects on neighbouring land. However, the Crown can only be bound by GNRs and do not have to meet the requirements of other rules within the Plan. There are specific criteria for how GNRs are to be used in RPMPs. GNRs can only be used to manage pests spread across a property boundary (not for management within a property) and the neighbour must be taking reasonable steps to manage the pest on their land.

In some cases the Council proposes to apply a rule to require management across a property, or require boundary control regardless of steps taken by a neighbour. Where GNRs are proposed, an additional rule is included to satisfy the requirements of the NPD, but not limit the application of the standard internal and/or boundary rules. For example, land occupiers are required to control possums at or below 4% residual trap catch if their property is inside the Possum Control Area Programme (Plan Rule 10). The Department of Conservation are not bound by this rule and forestry are exempt. Both DOC and forestry are, however, required to meet the Good Neighbour Rule (Plan Rule 11) where they must maintain possums at or below 5% residual trap catch within a 500m buffer (but not across the entirety of the property). This also applies to properties adjacent to the Possum Control Area Programme.

Predator Free NZ Trust online submission form

Predator Free NZ Trust created an online submission form on their webpage containing auto-populated fields. This was promoted through various avenues including Facebook and through their newsletter. One of the key submission points in this online submission form recommended changing the definition from 'feral cat' to 'pest cat' within the Plan. This generated a large response of submissions both in support and against the PFNZ submission points. It also generated interest from organisations such as Feline Rights NZ who strongly opposed the recommendation. All responses received from this online form have the title 'PFNZ Trust online submission form' in the summary of submissions and staff response report below.

Resource Management Act/Biosecurity Act confusion

There was confusion between the Resource Management Act (RMA) and the Biosecurity Act in multiple submissions. This Plan has been drafted under the Biosecurity Act, not the RMA, and therefore RMA legislation does not apply. Regional Pest Management Plans must meet the requirements of the National Policy Direct for Pest Management 2015 and the Biosecurity Act 1993. Specifically, a Plan must meet the purpose of Part 5 of the Biosecurity Act, which facilitates eradication or effective management of harmful organisms that are present in New Zealand by providing for:

- a. the development of effective and efficient instruments and measures that prevent, reduce, or eliminate the adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga; and
- b. the appropriate distribution of costs associated with the instruments and measures.

The Plans balance property rights by setting rules that specify the rights and obligations of those parties to which they apply.

In regards to impacts on Māori, the Plan must achieve the purpose of Part 5 s70 of the Biosecurity Act:

(e) the effects that, in the opinion of the person making the proposal, implementation of the plan would have on —

(i) economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga.

Summary of submissions and staff response report

The following spreadsheet contains a summary of submission points and decisions requested by each submitter. The summary does not contain each submission in their entirety, but rather a statement of the decisions requested in submissions. Please refer to each submission for further information.

The summary is presented by submitter (each Submitter has been allocated a 'Submitter Number'). The columns 'Submission' and 'Relief' are extracted from each submission of which spelling or grammar have not been altered. A number of submissions did not adhere to the requirements of the submission form (as set out in the submission form) and did not provide the information specified. Where possible, Council officers have interpreted these submissions to the best of their ability, to identify the decision being sought or implied and entering these in the 'Relief' column. Each decision requested endeavours to identify the individual outcomes sought in the submission. The titles 'Staff recommendation' and 'reasons' have been produced by Hawke's Bay Regional Council staff.

Full copies of individual submissions are available for viewing at <https://www.hbrc.govt.nz/services/pest-control/biosecurity/pest-management-plan-review/> or at the Regional Council offices, 159 Dalton Street, Napier. A full copy of any submission can be supplied on request by emailing pestplan@hbrc.govt.nz or ph 06 833 8007.

Submitter quick reference guide

Submitter Number	Name	Page No.	Wish to be heard
1	Gilbert Smith	10	No
2	Margaret Symons	13	No
3	Tim Gilbertson	13	Yes
4	Kylie Howard	14	No
5	Marie Taylor	14	No
6	Rayonier Matariki Forests	17	Yes
7	Ngāti Pahauwera Development Trust	18	No
8	Chilean Needle Grass National Steering Committee	19	No
9	Cat Foundation	23	No
10	Hawke's Bay District Health Board	25	No
11	Napier Branch of Royal Forest and Bird	25	No
12	Tangata Whenua Hawke's Bay	29	Unconfirmed
13	East Coast Hawke's Bay Conservation Board	39	No
14	Napier Port	41	No
15	Fisheries Inshore NZ Ltd.	44	Unconfirmed
16	Ministry for Primary Industries	52	Yes
17	Department of Conservation	65	Yes
18	Federated Farmers of New Zealand	85	Yes
19	KiwiRail	101	No
20	Garth Eyles	105	Yes
21	Forest & Bird (head office)	111	Yes
22	Donald Bauckam	123	No
23	Morgan Foundation	124	No
24	Predator Free New Zealand Trust	128	Yes
25	Predator Free New Zealand (PFNZ) Trust online submission form	132	No
26	The New Zealand Cat Foundation/Feline Rights New Zealand	158	Yes
27	Peter Manson	163	No
28	Paddy Maloney	163	No
29	Mike Healy	165	Yes
30	Maungaharuru Tangitū Trust	166	Unconfirmed
31	Mike Lusk	175	No
32	Pete Shaw	175	No
33	Hawke's Bay Regional Council	176	No

No.	Name	Submission	Relief	Staff Recommendation	Reasons
1.1	Gilbert Smith	<p>Chilean Needle Grass should be moved to progressive containment programme.</p> <p>Note: Unless you take a firm stand, noxious weeds will continue to spread across our region and our country. CNG originated in a small area near Bay View. Man has been responsible for its spread over HB (stock/machinery) and to the N. South Island (in hay sold/donated to drought affected farmers).</p>	Move Chilean needle grass to Progressive Containment	Reject	<p>The current aim of the proposed Chilean needle grass programme is to sustainably control Chilean needle grass within the Hawke's Bay region to ensure:</p> <ul style="list-style-type: none"> (i) that current infestations levels do not increase; and (ii) spread to other properties is prevented. <p>Staff do not believe that Chilean needle grass would meet Progressive Containment requirements at this point due to its current distribution, the difficulty in identifying the pest (can go undetected on a property for many years) and limited control tools. Sustained Control has been identified the most appropriate programme taking into account the following:</p> <ul style="list-style-type: none"> (a) nature of the distribution of infestations, (b) control tools available, and whether the distribution of the species can be reduced. <p>Listing the Chilean needle grass programme under Progressive Containment would be inconsistent with the National Policy Direction. This programme can however be reassessed in the future and moved to Progressive Containment if, for example, new tools were to become available in controlling this pest.</p> <p>Resources for this programme have just been increased through the current Long-Term Plan process, adding another .4 FTE to increase surveillance and response during the flowering and seeding period. Increased restrictions are also included in this Plan in</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					regards to making hay/silage. Please refer to Plan Rule 7 (pg 56) in the Proposed Plan.
1.2	Gilbert Smith	Biological control (rust) to be introduced asap.	Introduce biological control of Chilean Needle Grass	Note	<p>Council actively participates in the BioControl Collective (managed by Maanaki Whenua) of which Chilean needle grass is actively being researched for a biocontrol agent. A rust has been identified but there have been difficulties in importing this rust from Argentina. Staff will follow any developments on biological control for this organism.</p> <p>Biological control sits outside the RPMP, and is part of the Council's wider biosecurity programme.</p>
1.3	Gilbert Smith	Cape weed (<i>Arctotheca calendula</i>), broom, wilding pine should be added to Sustained control programme.	Add broom, cape weed and wilding pine to sustained control programme.	Reject	<p>Broom is widely distributed across the Hawke's Bay region. It is listed as an Organisms of Interest where it will be noted for surveillance or future control opportunities. Site-led control could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme and expected outcomes, and consideration/consultation on funding arrangements is provided.</p> <p>Cape weed (daisy) is widely distributed across Hawke's Bay. Staff do not believe</p>

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					<p>adding it to the Plan would meet the requirements of the National Policy Direction, as the benefits would not outweigh the costs.</p> <p>Wilding pine are widespread across the region. Staff do not believe it would be achievable to manage wilding pine under sustained control.</p>
1.4	Gilbert Smith	Boundary control for blackberry 6.4.7, nodding thistle 6.4.9, and variegated thistle 6.4.11 should be at least 500m - seeds blow or are carried by birds even further than this!!	Add boundary control (500m) programme for blackberry, nodding thistle, and variegated thistle.	Reject	Although seeds can be transported further than proposed distances, most seed falls close to the parent plant. The cost of control for a 500m boundary control rule for these species would significantly outweigh the benefits received by the adjacent land occupier.
1.5	Gilbert Smith	Briar rose will become a major problem with drier climate! Especially near cities; castor oil plant (<i>Ricinus communis</i>), moth plant, thorn apple (<i>Datura stramonium</i>) and hemlock should be eradicated. And the angel trumpet tree (<i>Datura</i>) and opium poppy should go too. Ministry of Health might help?	Add briar rose, castor oil plant, moth plant, thorn apple, hemlock, angel trumpet tree and opium poppy to RPMP.	Reject	Mothplant is distributed across most urban areas in Hawke's Bay, including Napier Hastings, Havelock North and Wairoa. Given its current distribution, mode of dispersal (wind) and difficulty of control in urban environments, staff do not believe eradication is feasible. Staff are currently considering options outside the Regional Pest Management Plan, including a public awareness programme. Mothplant is currently listed as an Organisms of Interest within the Plan where it will be noted for surveillance or future control opportunities. Site-led control could be considered, if

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					<p>detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme and expected outcomes, and consideration/consultation on funding arrangements is provided.</p> <p>Briar rose, castor oil plant, thorn apple, hemlock, angels trumpet and opium poppy are widespread across the region with no feasible eradication option. Staff do not believe adding these species to the Plan would meet the requirements of the National Policy Direction as the benefits would not outweigh the costs.</p>
2	Margaret Symons	<p>We cut out our Chinese Privet. Now we have no spring runny noses and sneezing. So I dispute the results of the quoted Auckland study. Yet, if we go opposite on the Springfield Rd Rotary pathway, the symptoms all start up again. The whole area is full of privet. I would like to see all the privets cut down in winter when they are very visible amongst the deciduous willows. Then the stump could be painted with poison. Every year there are more and more privets on Springfield Rd. They started from the huge ones on the hill side of Springfield between 363 and 446 Springfield.</p>	<p>No specific relief stated, but implies the winter cut down of all privets along Springfield Rd Rotary pathway and stumps painted with strong tree killer.</p>	Reject	<p>A privet programme has been included in the Plan (6.4.2 pg. 56) with the objective of minimising adverse effects of privet on human health brought to Council's attention. Given the large number of species than can trigger an allergenic response, such as silver birch, olive, plantain and grasses, large-scale removal of privet in isolation is unlikely to have a significant impact regionally for allergy sufferers. A targeted approach has been taken for the privet programme.</p>
3	Tim Gilbertson	<p>I oppose the failure of HBRC to address the problem of feral cats</p>	<p>Adopt a similar approach to the problem of stray /wandering /wild dogs</p>	Reject	<p>Council's approach to management of the impact of feral cats is through a Predator Control Area programme (section 6.4.5 pg.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		I seek that HBRC make a serious attempt to control feral cats by adopting a similar approach to the problem of stray /wandering /wild dogs and refer to my previous submission for details			63) and Site-led programme (6.5 pg. 77). These programmes are designed to manage feral cat impacts on wildlife and primary production. Council does not currently have the capacity to establish, manage and enforce a domestic cat programme in alignment with current dog control bylaws. It is of staffs view that this should sit with local authorities as dog control does.
4	Kylie Howard	I want some thought into planning of drops of 1080. Not before school hoildays when we and other families can tramp and hunt on doc land. And also not dropped when hines have fawns. This is a cruel death.	Some regulation into timing of drop.	Note	The relief sought is outside the scope of the RPMP. It is not the remit of the Plan to detail which pesticides should be used and when. When Council undertakes control on behalf of land occupiers or on its own land, best practice is followed to minimise non-target effects from the use of animal pesticides. Council does not administer Department of Conservation land.
5.1	Marie Taylor	The HBRC proposes no change to current resourcing levels surrounding rabbit control. Yet if the HBRC is to support the Hawke's Bay Biodiversity Strategy, it needs to actively encourage and demonstrate best practice rabbit control in high ecological value areas. One example is any sand dune habitat where rabbit numbers are currently decimating natural vegetation. While the HBRC is encouraging a great deal of urban and peri-urban planting, all this is compromised without appropriate rabbit control. The HBRC should be showing some leadership in this area. In the	For high ecological value areas and areas where the public are being encouraged to participate in plantings by the HBRC, then rabbits should be controlled by the HBRC, and best practice rabbit control demonstrated on a much wider scale. (I'm also adding hares in here too).	Reject	Rabbit control is land occupier responsibility. If rabbit numbers are high, Council should be notified. A site assessment will be undertaken including monitoring rabbit densities using the Modified McLean Scale (2012) and a management plan agreed with the land occupier. For large areas requiring significant investment in rabbit control Council may, at its discretion, assist land occupiers in meeting some of these costs.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Regional Pest Management Plan discussion document it says on the "Managing Pests" page that the council actively manages rabbits, but this is patently untrue if no changes to resourcing are proposed.</p>			<p>Land occupiers with rabbit issues can contact Council for a free of charge site visit from a professional contractor where an assessment will be undertaken and appropriate control tools recommended. Council was recently involved in the national release of RHDV1K5 virus, where it was released at multiple sites across the region to maximise efficiency. Staff believe the current budget is adequate in meeting the current plan objectives.</p> <p>Council does not currently have the capacity to undertake repetitive rabbit control at high ecological value areas. This would require a significant investment from ratepayers. Staff are open to a discussion of how it could better help land owners control rabbits impacting on high ecological value areas.</p>
5.2	Marie Taylor	<p>Currently the HBRC ranks deer control under the site-led status. I would like the HBRC to rank deer control much more highly, as they are a significant and increasing threat to virtually all high value ecological areas in Hawke's Bay. Deer remove the most palatable species first, and then continue removing species by species. This means that very few deer can keep a lid on regenerating palatable species, and the forest is decimated of its diversity. The HBRC should be advocating strongly to landowners that greater control is necessary if we are not to lose more of naturally vegetated landscapes throughout Hawke's Bay. This needs</p>	<p>Raise the emphasis on deer control to actively promote and encourage deer control; set aside significant provisions for top up fencing of covenants, council owned land and reserves.</p>	<p>Accept in part</p>	<p>The Plan acknowledges that deer selectively browse native vegetation and as a result can change forest structure and composition of understory. Feral deer are currently declared a pest in site-led areas, with the aim of supporting the community in undertaking feral deer control at sites of ecological importance.</p> <p>The Ecosystem Prioritisation process undertaken outside of the RPMP process has highlighted key areas for Council to focus its efforts with funding attached to this. This</p>

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		<p>significant resourcing, as virtually all existing reserves and covenanted areas throughout the Bay need top up deer fencing to exclude deer, and then high quality control to remove any remaining deer from inside of reserves. What is the point of adding more reserves to the network if we are not protecting the existing ones properly? There are virtually no fully functioning forest ecosystems in Hawke's Bay because of feral deer pressure.</p>			<p>funding includes some resourcing for fencing.</p>
5.3	Marie Taylor	<p>I support creating binding goat management areas in the same way possum control has been rolled out. Why has it taken so long to roll out this successful idea through other pest species? As well as creating these management areas, I would like to see all legally protected reserves and covenanted areas fully fenced from goats. If the landowners in these areas cannot afford the fencing the HBRC should be contributing significantly to these areas. As well, there should a specialist contractor employed to continually repair the fences. If this doesn't occur, you may as well write off any positive conservation outcomes from Napier to Gisborne. I think the boundary control rule is admirable but it needs a wider scope such as helping with fencing. The HBRC should also encourage forestry companies to deer and goat fence high value ecological areas within production forestry blocks. Hunting alone will not be enough to protect these high value areas into the future.</p>	<p>Create binding goat management areas and support landowners in those areas more with fencing and fence repairs, particularly if they already have made the commitment to legally protect natural areas of vegetation by using covenants or reserves.</p>	<p>Reject</p>	<p>Feral goats are declared a pest under Site-led programmes and have a specific Good Neighbour Rule that applies. The objective is to manage impacts of feral goats on areas of ecological importance and native plantings whilst balancing the property rights of others who farm goats as a source of income. 'Agreed management plans' will be the main tool used for managing this programme, requiring fencing and goat control to be undertaken. The option of goat binding areas were assessed by staff and consulted on through the discussion document but lacked support (23%) primarily due to not adequately balancing property owner rights.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
6.1	Rayonier Matariki Forests	Rayonier Matariki Forests (RMF) question why the residual trap catch (RTC) threshold has been reduced from 5% to 4%. As owner and manager of extensive areas of production forest in the region, which often borders DOC land we find it very difficult to maintain possum RTC densities at 5% particularly where these are not being effectively controlled by DOC or adjacent neighbours.	Maintain residual trap catch level at 5%.	Accept in part	<p>As per the <i>Hawke's Bay Regional Possum Control Technical Protocol (PN 4969)</i>, production forestry is not required to maintain possum densities below 4% residual trap catch (RTC) across all its land. Only the Good Neighbour Rule applies, requiring production forestry land that borders land included in a Possum Control Area to maintain possum densities below a 4% RTC within a marginal strip no less than 500 metres into the production forestry land.</p> <p>Staff have considered this submission and recommend changing the residual trap catch requirement to 5% for the Good Neighbour Rule.</p>
6.2	Rayonier Matariki Forests	Rayonier Matariki Forests (RMF) do not support the piecemeal approach for feral goats proposed by this rule. Feral goats are the number one pest problem for production forestry causing significant damage to our exotic plantings and indigenous ecological areas. Unified control across the region is required to be effective.	Council need to establish a rule that seeks to effectively control feral goats across the region. The 500m adjoining property boundary distance should be removed, with the requirement being to destroy all feral goats on a property where adjoining property ecological, recreational	Reject	Feral goats are declared a pest under Site-led programmes and have a specific Good Neighbour Rule that applies. The objective is to manage impacts of feral goats on areas of ecological importance and native plantings whilst balancing the property rights of others who farm goats as a source of income. 'Agreed management plans' will be the main tool used for managing this programme, requiring fencing and goat control to be undertaken. The option of goat binding areas were assessed by staff and consulted on through the discussion document but lacked support (23%)

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			values or economy well-being require protection.		primarily due to not adequately balancing property owner rights.
7	Ngati Pahauwera Development Trust	Specifically regarding Hornwort which is an invasive aquatic pest - we believe that it should be included and regarded with higher regard to removal in 4.1 rather than in section 4.2	We oppose the inclusion of Hornwort in the section 4.2 that it may be controlled and would like to see it moved to the 'declared as pest' and intended to eradicate section above in 4.1	Reject	Hornwort is well established in Hawke's Bay and staff do not believe eradication is feasible. Council does not currently have the capacity to undertake hornwort control. If control was the appropriate response, then HBRC would need to substantially increase its resourcing over current levels. Staff have advised careful consideration needs to be given to potential outcomes of hornwort control. There is a risk that the removal (or reduction) of hornwort could lead to adverse deteriorations in ecological structure and function. The worst-case scenario is that a lake could switch from a stable state that is plant dominated to an algae and/or cyanobacteria dominated state. These changes may be difficult to reverse. While hornwort removal could be worthwhile at some lakes, it would require an in-depth study of water quality before and after. In addition, hornwort would need to be removed from all streams, ditches, etc.
7.2	Ngati Pahauwera Development Trust	2.5 pg 18 My submission is that I support Reasons While we support the final paragraph in this section. "The LGA requires Council to recognise and respect the Crown's responsibilities under the	I seek the following decisions from the Hawke's Bay Regional Council: Excluding JPC and Maori Committee consultation -		Staff welcome this suggestion and sees great value in in building closer working partnerships with tangata whenua in working towards the RPMP's purpose under the Biosecurity Act. Staff recommend Council commits to undertaking this process

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Tiriti o Waitangi - Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes supporting tangata whenua. These responsibilities and requirements were met while preparing this plan and will continue after it takes effect. This Plan is one of the avenues to build synergy and co-operation between Māori organisations and Hawke's Bay as partners in managing the Region's natural resources" we would like to hear how this will work practically. We re-attach the NPDT submission to the HBRC annual plan 2017.</p>	<p>how will HBRC support and cooperate with Tangata whenua and its Treaty Partners and how will we work as partners to manage the region's natural resources. We would like to see real partnership with HBRC on plant and pest control in the Ngati Pahauwera rohe where we can work together on removal of Hornwort from the Putere Lakes, blackberry in the pahauwera rohe, ground based possum control in forests and native bush, employment pathways for our members and opportunities for participation and education. We would like our members to be doing the mahi in our rohe.</p>	<p>Note</p>	<p>over the duration of the Plan through amending <i>Section 2.5 Relationship with Māori</i> adding the following statement:</p> <p><i>Over the duration of this plan, Council will seek to build a stronger relationship with tangata whenua and build on how this plan can better achieve their goals and aspirations for pest management. Māori involvement in biosecurity is an important part of exercising kaitiakitanga. Pest management will play an important role in protecting wāhi tapu and taonga, restoring the mauri of whenua and wai māori, and enhancing the well-being of local communities. Successful pest management is holistic in nature and recognises the interconnectedness of people and the environment. To achieve these outcomes for the rohe, all must work together. Council will seek engagement from tangata whenua in holding conversations on what this will look like. Work programmes to be undertaken that will assist with this relationship building and link to this plan are the development of a cultural framework and survey of taonga sites through the Biodiversity Action Plan, the development of a Predator Free Hawke's Bay initiative, growing the Cape to City and Poutiri Ao ō Tāne projects.</i></p>
8.1	Chilean Needle Grass National	HBRC PMP 2017 On behalf of the Chilean Needle Grass National Steering Committee, (CNGNSG),	No relief stated		Staff are appreciative of the work the CNGNSG has undertaken in raising

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Steering Committee	thank you for the opportunity to submit on your proposed plan. The CNGNSG wants to work alongside the Biosecurity team members in the raising awareness of the pest plant, supporting the standardization of policies and rules across all regional authorities with respect to the prevention of spread and the raising the debate for all New Zealand of the need to stop the spread and push back against the levels of infestation.		Note	awareness of CNG. They also fully support the establishment of a Hawke's Bay Chilean needle grass farming group. Staff will be a member and help resource such a group but the group must be farmer driven and led as in other regions. In support of this initiative Council funded two Hawke's Bay landowners to travel to Blenheim to attend the CNG steering group meeting to foster the development of a Hawke's Bay farmer CNG initiative.
8.2	Chilean Needle Grass National Steering Committee	Whilst the CNGNSG support the proposed plan changes, where they increase the level of response to CNG, however oppose the proposed changes where they decrease the level of response, further the CNGNSG endorse the Federated Farmers submission on this point. It is important that the following is considered by the commissioners and that arguably room for a higher status and a reclassification based on a re-working of the cost benefit analysis is considered. The opportunity to look at the data set used in this program proposal would be welcomed by the CNGNSG. The argument can be made for Eradication (Total Control); however balancing the needs of land owners with the pest plant, means to be too draconian could result in driving the problem under ground; balancing the assessment is also important, as grouping it under sustained control risks it being seen only as a weed and a nuisance compliance problem; this risk is real and of significant concern; apathy should not be allowed	No specific relief stated, but implies that Chilean needle grass should be changed to Progressive Containment.	Reject	Chilean needle grass is listed as Total Control under the current Regional Pest Management Strategy, with the strategy objective 'to contain the population of Chilean needle grass within the known infested properties'. The proposed programme under the RPMP is the same programme but the title has been aligned with the National Policy Direction, being Sustained Control. Both Environment Canterbury and Marlborough District Council have also aligned their programme to Sustained Control. Listing Chilean needle grass under Progressive Containment would be inconsistent with the National Policy Direction. This programme can however be reassessed in the future and moved to Progressive Containment if, for example,

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>to rule. Eradication would be problematic due to the lack of research of control options; my argument is that we need to have this plant pest under progressive containment programmes; for the life of this plan, enabling the door to be left open to elevating to Pests to be managed under eradication programmes 10-15 years out from now. How to elevate to progressive containment programme status; this is problematic due to the way that these programmes are determined. This is elaborated on further. It is noted that the plan allows for best management practice as opposed to a prescribed rule with the introduction of good neighbourly rule for feral goats but CNG does not warrant such a policy?; yet as attached, the Pathway management notes supplied to landowners when infestations are found contain liberal best practice advice; proving the case for introduction of best practice within regional authority policy as well as at operational level. HBRC is to be commended for acknowledging how the biosecurity team is working with groups of people, yet to date the biggest pastoral pest threat CNG, does not have a group formed, but welcome the fact that when one has been established the HBRC will work with them. This is a 10 year plan, but you need to look further than 10 years to understand bio security risks. Critical mass of a pest species can establish slowly initially but will at some point result in exponential growth. Maybe I need to paint this picture for your future: Whole catchments, becoming all of Hawkes Bay infested; sheep systems non existent or highly modified and few and far between, no sheep processing industry,</p>			<p>new tools were to become available in controlling this pest.</p> <p>Council has just increased its resources for this programme through the current Long-Term Plan process, adding another .4 FTE to increase surveillance and response during the flowering and seeding period.</p> <p>Further, Council has increased its restrictions on land occupiers in making of hay/silage and requires all properties with CNG to have an agreed Written Management Agreement with Council. This agreement will specify targeted Chilean needle grass control and pathway management requirements for the property.</p> <p>Please note, Total Control under the current Regional Pest Management Strategy does not equate to Eradication under the new Plan.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>no wool industry no sheep livestock cartage of any scale. Sheep systems replaced by beef and deer systems, and forestry. Recreational use limited, conservation value negative complete loss of grassland biodiversity. Look around Melbourne in Victoria, we don't have vast areas of cheap land; interestingly the fact Chilean needle grass is a Weed of National Significance (WONS) and is considered to be one of the worst weeds in Australia because of its invasive nature, potential for spread, and economic and environmental impacts; and in the Hawkes Bay, is identified as a threat/cost to arable exports to Australia in your plan... the risk to NZ economy is 1000'sX more than arable exports to Australia from HB. Why do we need PMP to recognize CNG in the progressive control program status. We need to have hope, hope will come from awareness and education, the later will come from a recognition in the PMP that gives the pest threat status it deserves, rather than than the gradual downgrading due to ignorance of the science, environmental impact, economic impact and public apathy. HBRC has a environmental strategy, and pest management strategy, and then a 10 year PMP, which contains rules, for a proposed program. The justification of those rules and that PMP are documented and include a cost benefits analysis of the proposed program as opposed to the cost and benefit to the wider NZ or Regional context of eradication(if the Pest plant is not in total control or eradication) The Cost Benefit assessment is for the proposed control program; this is based on historical knowledge of pest species and the likely success of the program,</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>a range of values are obtained for the inputs and somehow an average is derived for the calculation, the formula has limited variables and differential weightings, and is designed to take out some of the political interference in programs of the past , whilst this is to be commended, the data set used is used to validate the program designed rather than to determine the program choice.; averages in reality do not exist and what happens is the effects are minimized rather than maximized; in addition the un-intended consequences are not recognized. MPI require this assessment, but it only calculates cost benefit of success of proposed plan, not of eradication of; history tells us these assessments are used for the wrong purpose and for this to be used for cost/benefit to NZ we have a problem. The CNGNSG wishes to be heard, and would like to present more evidence to support this submission.</p>			
9	Cat foundation	<p>I totally disagree with Councils attempts to put cats without a microchip into a pest/ feral category! You will meet with huge opposition and unless you all want to be voted out if your positions I would change your attitude!</p>	<p>Change your attitude. Cats are the most loved companion animals all over the world. Do not try and change them into pests!</p>	<p>Note</p>	<p>Feral cats are declared a pest under the Site-led programme. No reference is made to micro chipping. Companion cats are not declared a pest under this Plan. Feral cats are one component of the predator control programme. The focus is not specifically on cats, but rather as one of the suite of predators, primarily in the rural landscape. As clearly stated in the plan feral cats have been branded as 'the ultimate predators' in New Zealand and have been nominated as among 100 of the "World's Worst" invaders. New Zealand's unique native wildlife is particularly vulnerable to predation by cats. Feral cats kill young and adult birds and</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>occasionally take eggs, prey on native lizards, fish, frogs and large invertebrates. Cats are highly efficient predators, and have been known to cause local extinctions of seabird species on islands around the world. Both sea and land birds are at risk, particularly those that nest or feed on or near to the ground. Feral cats are implicated in a small way in the spread of Bovine Tuberculosis, with the potential to infect cattle. They also carry parasites and toxoplasmosis that cause abortions in sheep and illness in humans. Feral and stray cats can be aggressive towards companion cats. Through fighting they can cause severe injuries, sometimes resulting in euthanasia of companion cats. Stray cats are likely to interbreed with the un-neutered domestic cat population and may spread infectious diseases.</p> <p>A National Cat Management Strategy Group (NCMSG) was formed in November 2014 by eight national organisations to develop a national overarching strategy for responsible, compassionate and humane cat management in New Zealand through a collaborative and proactive approach. The key principles of the strategy are the promotion of responsible cat ownership, humane cat management, and environmental protection. The New Zealand National Cat Management Strategy Discussion Paper released by this group</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					acknowledges the problems associated with cat overpopulation and feral cats. They state they are cognisant that the issue of cat management is complex, and that the interests of all species must be considered. Members of this group included the New Zealand Companion Animal Council, New Zealand Veterinary Association and the Royal New Zealand Society for the Prevention of Cruelty to Animals. For further information please visit the NZ Companion Animal Council website: http://www.nzcac.org.nz/nzcac/nzcac-resources/nzcac-newsletters/7-blog/83-national-cat-management-strategy-discussion-paper
10	Hawke's Bay District Health Board	Thank you for the opportunity to provide feedback to the Proposed Hawke's Bay Regional Pest Management Plan Review. Please find below our submission. The use of agrichemicals will be a significant tool used to meet the Objectives in this Proposed Plan. The misapplication of agrichemicals can have a negative impact on public health. The Regional Council's Resource Management Plan Rule 9 and 10 cover the discharge of agrichemicals into air or onto land arising from their use.	It is submitted that reference to these Rules should be made in Section 3.3.1 'Responsibilities of owners and/or occupiers of the Proposed Plan'.	Accept	Staff recommend that reference should be made to Council's Resource Management Plan Rule 9 and 10 in section 3.3.1
11.1	Napier Branch of Royal Forest & Bird	1.1 Proposer. On behalf of the Napier Branch of Forest & Bird along with myself, I wish to congratulate Council on the formulation of the	No decision requested, but implies support for		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Proposed Regional Pest Management Plan, 2018 to 2038.</p> <p>1.2 Purpose. The purpose of the proposals are good. With monitoring, these may require reviewal over the duration of the programme.</p> <p>1.3 Coverage. The operating success must cover all of the Hawke's Bay region administrative boundaries.</p> <p>1.4 The duration is good but Council may need to review the programme with extension proposals especially if resources become diminished.</p> <p>2.1.1 Council's biosecurity framework. It remains of prime importance for Council to engage with all land owners/occupiers/ guardians and the wider community to make this ongoing programme successful. Under the implementation of the Hawke's Bay Biodiversity Strategy programme it remains vitally important to halt biodiversity decline. With everybody working together, Hawke's Bay's biodiversity can be enhanced.</p> <p>2.2 Legislative background and 2.2.1 Biosecurity Act, 1993. The Biosecurity Act of 1993 with its functions, powers and duties in a leadership role will exclude, eradicate and or effectively manage pests under Regional Council leadership.</p> <p>2.2.2 Resource Management Act 1991. This act is also to promote and manage the Coastal Marine Area.</p>	<p>the mentioned sections and programmes</p>	<p>Support</p>	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>2.2.4. Wild Animal Control Act. In full agreement.</p> <p>2.2.6. Other Legislation. In full agreement and enforce.</p> <p>2.3. Relationship with other Pest Management Plans. 2.3.3. Predator Free 2050. Good, but we need to include a massive reduction with the rabbit population which is well out of hand</p> <p>2.5. Relationship with Maori. Most important and supportive.</p> <p>3. Responsibilities and Obligations. Pg. 18. Supportive.</p> <p>3.3.2. Crown Agencies. Agree as they should be bound to responsibilities under the plan. 3.3.3 and 3.3.4. Agree as they should be bound to responsibilities under the plan.</p> <p>4. Organism Status. Pg. 21. Agree with this section.</p> <p>5. Pest Management Framework. Pg. 25. Agree with this section.</p> <p>6. Pest descriptions and programmes. Pg. 28. 6.2.9 Possums. Continue with eradication programmes</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
11.2	Napier Branch of Royal Forest & Bird	6.3.4. Darwin's Barberry. We are pleased that you have included this pest within the programme.	No specific relief stated, but implies support for Darwin's Barberry programme	Note	
11.3	Napier Branch of Royal Forest & Bird	6.4.3. Rabbits. More control required. Our Havelock North property would currently sit between 4 and 5 on the McLean Rabbit Infestation Scale. When is the new bate/poison available locally?	No relief stated	Note	Land occupiers with rabbit issues can contact Council for a free of charge site visit from a professional contractor where an assessment will be undertaken and appropriate control tools recommended. Council was recently involved in the national release of RHDV1K5 virus, where it was released at multiple sites across the region to maximise efficiency.
11.4	Napier Branch of Royal Forest & Bird	6.4.4. Possums. Continue the programme and monitor. 6.4.7 and 6.4.8 Blackberry and Gorse. Continue the programme	No decision requested, but implies support for the mentioned programmes	Accept	
11.5	Napier Branch of Royal Forest & Bird	6.4.11. Variegated Thistle. Eradication required, especially in Council owned areas, eg, area of land adjacent to the TukiTuki River between Riverlands Park and the Black Bridge.	Eradication of variegated thistle	Reject	Variegated thistle is currently listed as a boundary control pest plant under the Sustained Control section. It is widespread across Hawke's Bay, with large infestations in Central Hawke's Bay. Staff do not believe eradication is feasible nor would the benefits outweigh the cost of the programme.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
11.6	Napier Branch of Royal Forest & Bird	6.5. Pests to be managed under site-led programmes All of this section. and add 6.5.8. to include Hedgehogs ! Suggest continuance with a monitored [where practical] culling /trapping programme.	Add hedgehogs to Site-led programme	Accept	Staff recommend hedgehogs be added to the list of pests in Section 6.5 Pests to be managed under site-led programmes
11.7	Napier Branch of Royal Forest & Bird	7.Monitoring. Pg. 81. Fully in support of this invaluable programme for the total Pest Management Plan to become a success. 8 Procedures. Pg.84. Support and agree with this section. 9. Funding Analysis. Pg. 86. Largely in support of this section	No decision requested, but implies support for the mentioned sections	Accept	
12.1	Tangata Whenua Hawke's Bay	The signatories to this submission support this Proposed Regional Pest Management Plan (RPMP)in principal, however have concerns around measures to be undertaken with respect to integration of 1.Māori aspirations / Worldview / Obligations to the Taiao -Recognising Intergenerational Māori Values -Ki Uta ki Tai / Mountains to Sea / Maunga to Moana -Integrating plans with Matauranga Māori	No relief stated	Note	Points 1 - 4 in this submission point are covered below in No. 12.2 to 12.17.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>2.Methods of control to reach 4% residual trap catch (RTC) rate for possums aiming towards non-toxic application</p> <p>3.Requirement to undertake control on 'unproductive' termed whenua -What are the full cost implications related to the 500m Good Neighbour Rule (GNR) on Whenua Māori & Ngā Whenua Rāhui covenants -COST analysis and definition of control on 'unproductive land' or Maori must be explored</p> <p>4.Partnership Tangata Whenua -Our Maori engagement working with HBRC developing partnership in recognising and fulfilling the role, function and resourcing of Kaitiakitanga -Coordinated response realising Pest Management Strategy in practice by developing Maori partnerships and plans with central government organisations e.g Ospri, DoC MPI Ngā Whenua Rāhui, Ministry of Business, Innovation and Employment, Government Agencies -Technology compatibility, research and outcomes</p>			
12.2	Tangata Whenua Hawke's Bay	<p>RMA preamble All persons exercising functions and powers under the Act are required to recognise and provide for seven matters of national importance set out in section 6. This includes section 6(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.</p>	No relief stated		<p>The RPMP is produced under the Biosecurity Act 1993, not the RMA. The RMA's obligations for regional plans and policy statements do not apply to the RPMP's preparation. The submitter appears to have unfortunately conflated the requirements of the Biosecurity Act and the RMA. For</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Section 7 of the Resource Management Act sets out 'other matters' which persons exercising functions and powers under the Act must 'have particular regard to'. This includes section 7(a) kaitiakitanga. Section 8 requires that all persons exercising functions and powers under the Resource Management Act take into account the principles of the Treaty of Waitangi.</p> <p>Partnership 'Particular regard to advice recieved from those iwi authorities on the draft document', 'local authorities must also provide iwi authorities with a copy of the relevant draft proposed policy statement or plan, allow iwi authorities adequate time and opportunity to consider the draft document and provide any advice' [Clause 4A of Schedule 1, RMA]. Section 32(4A) evaluation reports must summarise all advice reviewed from iwi authorities on the proposal, and how the proposal responds to that advice. Given the Hawke's Bay Regional Council (HBRC) has a regional leadership role under the Biosecurity Act 1993, it is somewhat alarming that tangata whenua have had to call for a regional hui for information, discussion and input into the Proposed Regional Pest Management Plan (PRMP) for the Hawke's Bay region for the next twenty years.</p> <p>There are specific requirements for consultation with iwi authorities These include considering ways in which the local authority may foster increased capacity of hapu/iwi authorities to respond to an invitation to consult,</p>		Note	<p>example, there is nothing similar in the Biosecurity Act to those extracts from the RMA quoted by the submitter, nor does the Biosecurity Act feature anything in reference to Mana Whakahono a Rohe – those arrangements are solely a RMA tool.</p> <p>Specifically in relation to consultation with Maori during preparation of the RPMP, Council undertook the following:</p> <ol style="list-style-type: none"> 1. A Biosecurity Working Party, consisting of three councillors and three appointed members of the Regional Planning Committee, was formed and was responsible for considering and recommending to staff advice on the Regional Pest Management Plan review process and key issues. This working party provided guidance on the development of the discussion document, Proposed Plan and advice on how to best consult with Māori. 2. The Biosecurity team presented both the discussion document and the Proposed Plan to the Māori Committee, updating them on key items of interest and process of engagement. 3. Three emails were sent specifically to the Regional Policy Committee, Māori Committee and Post Settlement Government Entireties, one advertising

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>the establishment and maintenance of processes to provide opportunities for hapu/iwi authorities to consult, enabling hapu/iwi authorities to identify resource management issues of concern to them and indicating how those issues have been or are to be addressed. In order to assist with consultation, local authorities are required to maintain, for each iwi and hapu within its region or district, a record of the contact details for each hapu/iwi authority, the planning documents recognised by each hapu/iwi authority, and the area over which iwi or hapu exercise kaitiakitanga.</p> <p>Mana Whakahono a Rohe (Iwi/Hapu Participation Arrangements) A Mana Whakahono a Rohe must discuss: How hapu/iwi will participate in plan making processes, How required consultation with hapu/iwi will be undertaken, How council and hapu/iwi will work together to develop monitoring methodologies, How council and hapu/iwi will give effect to the requirements of any relevant hapu/iwi participation legislation (or agreements under such legislation), A process for managing conflicts of interest, A process for resolving disputes. Once a Mana Whakahono a Rohe has been finalised, councils must review their internal policies and processes to ensure they are consistent with the Mana Whakahono a Rohe.</p>			<p>the release of the discussion document for public consultation, one offering to meet with interested parties in person to discuss the Regional Pest Management Plan review and a final email advertising the release of the Proposed Plan for public consultation.</p> <p>4. This third email resulted in interest in the Proposed Plan and as a result a hui was held at Peak House, Te Mata Peak on 5 March of which HBRC staff attended and presented at. This hui was organised by Tangata Whenua Hawke's Bay.</p> <p>In response to other submissions, it is recommended that Section 2.5 Relationship with Māori be amended to include a commitment to work closer with Tangata Whenua including engagement (please refer No. 12.6 below).</p>
12.3	Tangata Whenua Hawke's Bay	Proposed RPMP Section 2.5 Relationship with Māori	No relief stated		Staff note the support for <i>Section 2.5 Relationship with Māori</i> .

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		We would like to see this resolved as suggested in the Proposed RPMP responsibilities and requirements being met in preparation of this plan, it is pleasing to note this Plan is synergistic towards co-operation between Māori organisations and HBRC as partners in managing the Region's natural resources.		Note	
12.4	Tangata Whenua Hawke's Bay	Section 6.4 Review current statement how HBRC going to work with landowners covering costs of 500m GNR (A wider conversation around Section 9 RPMP). What is the impact of GNR on Whenua Māori & Ngā Whenua Rāhui covenants. How do we go about solving this?	Review current statement how HBRC going to work with landowners covering costs of 500m GNR	Reject	Under the Proposed Regional Pest Management Plan, managing possums within the 500m Good Neighbour Rule area is the responsibility of the land occupier. Control is only required to be undertaken within this area upon receipt of a Written Direction by Hawke's Bay Regional Council. Control is not required as a default. In areas that are brought to Council's attention as an area of concern, Council will engage with the land occupier to discuss concerns. A Written Management Agreement will be drafted with the land occupier outlining the agreed management approach. Many factors will be taken into account when forming this agreement, including the size of the property, terrain, vegetation type, preferred control tools, access and cost. An important component of a Written Management Agreement is balancing the impacts of the pest with the cost of control.
12.5	Tangata Whenua Hawke's Bay	PRODUCTIVITY in ecological terms, refers to the rate of generation of biomass in an ecosystem, usually expressed in units of mass per unit surface	No relief stated	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		(or volume) per unit time, for instance grams per square metre per day (g m ⁻² d ⁻¹). For tangata whenua productivity as a concept in the Proposed RPMP requires much more interpretation. Fiscal costs borne by the interpretation of productivity do not fit the tangata whenua world view, and as such we are concerned about unjustified costs.			
12.9 12.6	Tangata Whenua Hawke's Bay	Section 7 Monitoring Adding indicators to monitoring to make sure Māori aspirations are reached.	Adding indicators to monitoring to make sure Māori aspirations are reached	Accept in part	Staff acknowledge that this relief has merit. It will however require thorough engagement with tangata whenua over a longer period to develop monitoring indicators that are meaningful and reflect the outcomes sought by tangata whenua. Staff see great value in building closer working partnerships and recommends Council commits to undertaking this process over the duration of the Plan through amending <i>Section 2.5 Relationship with Māori</i> , inserting the following statement: <i>Over the duration of this plan, Council will seek to build a stronger relationship with tangata whenua and build on how this plan can better achieve their goals and aspirations for pest management. Māori involvement in biosecurity is an important part of exercising kaitiakitanga. Pest management will play an important role in protecting wāhi tapu and taonga, restoring the mauri of whenua and wai māori, and enhancing the well-being of local communities. Successful pest management is</i>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<i>holistic in nature and recognises the interconnectedness of people and the environment. To achieve these outcomes for the rohe, all must work together. Council will seek engagement from tangata whenua in holding conversations on what this will look like. Work programmes to be undertaken that will assist with this relationship building and link to this plan are the development of a cultural framework and survey of taonga sites through the Biodiversity Action Plan, the development of a Predator Free Hawke's Bay initiative, growing the Cape to City and Poutiri Ao ō Tāne projects.</i>
12.7	Tangata Whenua Hawke's Bay	Section 8 Powers Conferred S 33, RMA 1991 Transfer of powers. The RMA provides for local authorities to transfer their functions, powers or duties under the Act to public bodies, including hapu/iwi authorities.	No relief stated	Note	The RPMP is produced under the Biosecurity Act 1993, not the RMA. To be clear, the RMA's provisions enabling transfer of powers under the RMA do NOT apply to the RPMP's preparation and implementation. The Biosecurity Act is the primary legislation for the RPMP. The submitter appears to have unfortunately conflated the requirements of the Biosecurity Act and the RMA.
12.8	Tangata Whenua Hawke's Bay	Bibliography We would like to see further reference to tangata whenua and HBRC as Treaty Partnership/s.	We would like to see further reference to tangata whenua and HBRC as Treaty Partnership/s		There are relationships in place with key Biosecurity programmes, such as Cape to City and Poutiri Ao ō Tāne, and Council is committing to further building these relationships in the biosecurity and biodiversity space with the intention to

No.	Name	Submission	Relief	Staff Recommendation	Reasons
				Accept in part	increase involvement in biosecurity planning and operations (please refer No. 12.6.). However matters of broader relationships and non-Biosecurity Act matters, such as Treaty Partnerships which are between tangata whenua and the Crown, are beyond the scope of this Plan.
12.9	Tangata Whenua Hawke's Bay	Glossary More definition around Matauranga Māori, Tangata Whenua and other words in this submission that would assist with the overall understanding, protection and fulfilment of traditional obligations.	More definition around Matauranga Māori, Tangata Whenua and other words in this submission.	Accept in part	<p>Staff agree more definitions of terms and concepts used in the RPMP could be included in the RPMP's glossary. It has been recognised that more definitions as a whole could be included in the glossary of the Plan to give readers better clarity. Staff recommend that the RPMP Glossary be amended to include the following Māori definitions:</p> <p><i>Mauri</i> means the essential quality and vitality of a being or entity.</p> <p><i>Rohe</i> means the territory or boundary that defines the areas within which a tangata whenua group claims association and mana whenua</p> <p><i>Tangata whenua</i> means in relation to a particular area, means the lwi or hapu that holds the mana whenua over that area.</p> <p><i>Taonga</i> means treasure, property: taonga are prized and protected as sacred possessions of the tribe. The term carries a</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>deep spiritual meaning and taonga may be things that cannot be seen or touched. Included for example are te reo Māori (the Māori language) Wāhi tapu, the air, waterways, fishing grounds and mountains.</i></p> <p>Wai māori means fresh water</p> <p>The plan already includes the following definitions in the glossary: Kaitiaki, Kaitiakitanga, Mana whenua, Nga Whenua Rahui covenant and Wāhi tapu.</p>
12.10	Tangata Whenua Hawke's Bay	<p>Matauranga Māori</p> <p>Due to the 20 year review period, integrating Matauranga Māori knoweldege & tikanga into understanding & response to impacts climate change, global warming, extreme weather events that result in unknown biological effects based on changing terrestrial, atmospheric, aquatic and marine temperature and chemistry.</p>	No relief stated	Note	<p>Although the life of the Regional Pest Management Plan is 20 years, a full review of the Plan it is required after 10 years. As referred to in No. 12.6, staff recommends Council seeks to build a stronger relationship with tangata whenua and build on how this plan can better achieve their goals and aspirations for pest management. Integrating Matauranga Māori knowledge & tikanga would be a component of this work.</p>
12.11	Tangata Whenua Hawke's Bay	<p>Freshwater pest fish</p> <p>While not in the scope of this plan, we envisage future RPMP to integrate freshwater pest fishes as water chemistry and biophysical parameters continue to respond to global warming and climate change.</p>	No decision requested, but implies inclusion of pest fish in future Regional Pest Management Plans	Note	<p>Staff are open to the conversation of pest fish and what could be achieved. This can be part of the conversation referred to in No. 12.6</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
12.12	Tangata Whenua Hawke's Bay	Along with working relationships with the Tangata Whenua of Hawke's Bay / Te Matau a Māui, we strongly recommend that HBRC uptake the expertise available through the Māori Biosecurity Network Te Tira Whakamātaki (http://www.biologicalheritage.nz/programmes/maori-biosecurity-network).	Recommend that HBRC uptake the expertise available through the Māori Biosecurity Network Te Tira Whakamātaki	Note	Council is connected to the Māori Biosecurity Network Te Tira Whakamātaki through BioManagers. Staff are willing to expand this relationship. It is recommended this is addressed as a component of No. 12.6.
12.13	Tangata Whenua Hawke's Bay	Free Prior Informed consent (FPIC), is to establish bottom up participation and consultation of an Indigenous Population prior to the beginning of a development on ancestral land or using resources within the Indigenous Population's territory (United Nations Declaration on the Rights of Indigenous Peoples, UNDRIP).	No relief stated	Note	
12.17 12.14	Tangata Whenua Hawke's Bay	Towards a Predator Free 2050 The "New Zealand Biodiversity Strategy 2000-2020" recognises and respects the role of Matauranga Maori in biodiversity management while providing for its retention and protection. We support Predator Free Hawke's Bay / Te Matau a Māui with opportunities to work alongside HBRC to achieve Māori aspirations.	Support Predator Free Hawke's Bay / Te Matau a Māui with opportunities to work alongside HBRC to achieve Māori aspirations.	Note	Māori involvement in Predator Free Hawke's Bay will be key component for success. Staff would like to grow this relationship and opportunities as stated in No. 12.6.
12.15	Tangata Whenua Hawke's Bay	Hawke's Bay Tangata Whenua would like to work with HBRC towards non-toxic / zero toxicity regional pest management involving Practitioners / Contractors through to best practice technological expertise e.g. GIS.	Work with HBRC towards non-toxic / zero toxicity regional pest management	Note	Although it is not the purpose of this plan to prescribe what tools are to be used in achieving pest management, staff support this aspiration to work towards non-toxic

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					forms of control. Research will be a critical component of achieving such a goal.
12.16	Tangata Whenua Hawke's Bay	Economic measures We can give effect to other Economic measures besides GDP, e.g. wellbeing indicators, Genuine Progress Indicator (GPI). Short, medium, longterm economic outcomes – e.g. meat, pelts from e.g goat, possum. As per the Prime Minister's instructions to Treasury to fiscal 2019 for measuring national progress on all three fronts - raising income while also improving environmental and social goods, we must work towards implementing wellbeing economics / wellbeing indicators.	Give effect to other Economic measures besides GDP, e.g. wellbeing indicators, Genuine Progress Indicator (GPI). Short, medium, longterm economic outcomes	Note	Staff support this relief. Council currently uses these measures where appropriate to assist in achieving its work programmes. An example of this is a possum control programme which utilises the harvest of fur to maximise use of resources and reduce the cost of the operation. Goat mustering is another example, which is undertaken prior to goat control, to again maximise the use of resources.
12.17	Tangata Whenua Hawke's Bay	We look forward to working in partnership with HBRC in its vision for Predator Free Hawke's Bay / Te Matau a Māui, mountains to sea ...	We look forward to working in partnership with HBRC in its vision for Predator Free Hawke's Bay / Te Matau a Māui, mountains to sea ...	Note	Staff appreciate this support and as stated in No. 12.6 and No. 12.14 recommends Council commits to forming stronger relationships with tangata whenua in pest management.
13.1	East Coast Hawke's Bay Conservation Board	We congratulate the HBRC on front-footing regional pest management that we will endeavour to complement with our up-coming CMS. Support the goal of working with neighbouring Regional Pest Management Plans such as the recent Gisborne District Council.	No decision requested, but implies support for the mentioned statements		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>As the community representatives, this Board's submission is based on flora and fauna pests that directly affect the conservation estate.</p> <p>The RPMP acknowledges the vision for biosecurity management in Aotearoa / New Zealand through the release of Biosecurity 2025 and the focus on control of possums, rats and stoats.</p> <p>The RPMP continues to work with the Cape to City project established in May 2015 which offers significant advances in wide-scale suppression of predators within both private and public conservation lands.</p> <p>The Hawke's Bay Biodiversity Strategy, a community perspective with the aim of halting biodiversity decline and protecting native species and native habitats is reliant on the RPMP.</p>		Accept	
13.2	East Coast Hawke's Bay Conservation Board	The board supports the proposed change with inclusion of a marine pest management programme. The marine pest management plan with all vessels entering Hawke's Bay waters to be clean of biofouling to prevent invasion of marine pests.	Support inclusion of marine pest management programme	Accept	
13.3	East Coast Hawke's Bay Conservation Board	Addition of wallabies as an exclusion pest. These are found in neighbouring regions.	Support inclusion of wallabies as exclusion pests	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
13.4	East Coast Hawke's Bay Conservation Board	The inclusion of several 'good neighbour' rules for pests such as possums and feral goats.	Support inclusion of 'good neighbour' rules	Accept	
13.5	East Coast Hawke's Bay Conservation Board	We also strongly support the emphasis on containment of the identified species and Sustained Control Programme.	Support Sustained Control programme	Accept	
14.1	Napier Port	<p>Part Two Section 5 pg 26 5.3 Principal measures to manage pests, Provision 4 Advocacy and Education Support (in full)</p> <p>Napier Port will be aiming to carry out, where appropriate the following;</p> <ul style="list-style-type: none"> a) increase awareness of the two marine pests through internal education. b) Utilise when appropriate social media around public education around these two marine pests; and c) include identification of these two marine pests in our procedures 'on port operations' including underwater pile inspections, underwater hull inspections, navigation buoy removal and turbidly buoy removal for maintenance. 	Maintain the current wording as it provides the Regional Council with a general purpose methodology to 'advocate and educate' people on pest management.	Accept	Staff appreciate the proactive nature and willingness of Napier Port in the management of marine pests. Staff look forward to working with Napier Port in raising awareness of marine pests.
14.2	Napier Port	Part Two Section 6 pgs 31-33 6.1 Pests to be managed under exclusion programmes	Accept in full the current wording.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		Support (in full) Napier Port wish to ensure the two listed marines pest do not become 'resident' in the Hawke's Bay region, and therefore they fully support the proposed exclusion programme.			
14.3	Napier Port	Pgs 31-32 6.1.8 Mediterranean fanworm and clubbed tunicate Support (in full) The exclusion programme of both marine pests is fully supported.	Accept in full the current wording of the description and adverse effects.	Accept	
14.4	Napier Port	Pg 32-33 Objective 1 Support (in full) This objective provides for the exclusion of, among others, the establishment of Mediterranean fanworm and clubbed tunicate, and therefore Napier Port is supportive of the objective.	Napier Port is supportive of Objective 1. Marine waterways which include the coastal marine area (CMA) will also be subject to the intent of Objective 1.	Accept	
14.5	Napier Port	Pg 33 Plan Rule 1 Support (in part) Proposed Rule 1 must meet the requirements of the Ministry of Primary Industries (MPI) Craft Risk Management Standard (CRMS) for Biofouling.	It is critical that this rule meet the Ministry of Primary Industry standard, requirements and thresholds, as set out in the Craft Risk Management Standard (CRMS) for Biofouling, and be a 'common rule'	Accept	Staff acknowledge Napier Ports concern and recommends changing Plan Rule 1 to align with long-stay vessels under the Craft Risk Management Standard (CRMS) for Biofouling. <i>Plan Rule 1</i> <i>The operator of a vessel entering the waters of the Hawke's Bays Regional Council Area</i>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			<p>across the country for vessel operators. If the regional plan rule is inconsistent or more stringent than that of the MPI rule there is a risk of losing shipping calls to the detriment of Hawke's Bay exporters.</p> <p>Ensure the intent of the proposed rule is no more stringent than the requirements of the Craft Risk Management Standard: Biofouling on Vessels Arriving in New Zealand (CRMS – Biofoul), 15 May 2014. This standard comes into effect on 15 May 2018</p>		<p><i>(Figure 6) must ensure the hull (includes hull area, niche areas and wind and water line) or any structure or navigation aid of any origin, to be sufficiently cleaned and antifouled so that there is no more than a slime layer and/or goose barnacles.</i></p> <p>It is also recommended that the following text accompanies the rule under the Explanation heading:</p> <p><i>'International vessels that will be staying in New Zealand waters for up to 20 days and only visiting approved Places of First Arrival, remain under and must abide by the rules of the Craft Risk Management Standard: Biofouling. International vessels staying for 21 days or more or visiting non-approved Places of First Arrival, however, must abide by the coastal plan rules of the relevant regional council/unitary authority, following completion of MPI biosecurity inspections in accordance with the CRMS.</i></p> <p><i>International vessels arriving in New Zealand waters have additional obligations under the Craft Risk Management Standard: Biofouling on Vessels Arriving to New Zealand (May 2014)'.</i></p> <p>This rule and explanation have been drafted with Ministry for Primary Industries support</p>
14.6	Napier Port				

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Pg 33 Statutory obligation Support (in part) A cross reference to the provisions of the Biosecurity Act 1993 provide for completeness purposes i.e. sections 52 and 53.</p> <p>It is therefore suggested that as noted in Section 4.1, Table 2, under section 45 of the Biosecurity Act 1993, the 'discovery' of the 'Mediterranean fanworm' is a notifiable organism. A sentence of that intent should also be added to this section, as this re-iterates the importance of the notification process.</p>	<p>Add the following sentence or similar.</p> <p>"The discovery of 'Mediterranean fanworm' is a notifiable organism under section 45 of the Biosecurity Act 1993, and must be complied with."</p>	Reject	<p>The statutory obligation states: Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993. A breach of these rules creates an offence under section 154(O) of the Act. It is not the purpose of the Plan to list all requirements under the Biosecurity Act. This information is better communicated through education and awareness programmes.</p>
15.1	Fisheries Inshore NZ Limited	<p>The Management Plan and Cost Benefit Analysis (CBA) emphasises the need for an education programme and targeting engagement. As per our submission on 7 July 2017 we support this, however note that providing detail on the proposed advocacy and education process would enable stakeholders to remain informed of the HBRC approach.</p>	<p>Request detail on the proposed advocacy and education process would enable stakeholders to remain informed</p>	Note	<p>Council's intention is to work closely with key stakeholders in developing a regional awareness programme. Engagement and education will play a vital role in preventing marine pests from entering the Hawke's Bay region. Council will approach key partners, such as Ministry for Primary Industries, Napier Port, Napier City Council, the commercial sector and recreational fishers, to seek involvement in its development.</p>
15.2	Fisheries Inshore NZ Limited	<p>A proactive (budgeted) education approach supported by non-regulatory methods such as voluntary registering incursions; and a public register that alerts of incursions will provide an effective way of achieving an education programme and targeting engagement.</p>	<p>A proactive education approach supported by non-regulatory methods should be implemented</p>	Note	<p>Staff support the notion of a non-regulatory awareness programme. Staff believe the best outcomes will be achieved by working closely with the community and key stakeholders. That said, regulation is required to enable Council to respond to</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					incursions and undertake enforcement on those individuals who do not take any practical steps preventing the spread of marine pests.
15.3	Fisheries Inshore NZ Limited	We note that the CBA proposes that the general rate funds this exclusion programme.	No relief stated	Note	
15.4	Fisheries Inshore NZ Limited	<p>Plan Rule 1</p> <p>The plan rule associated with the exclusion programme for marine pests states:</p> <p><i>'The operator of a vessel entering the waters of the Hawke's Bays Regional Council Area (Figure 6) must ensure the hull (includes hull area, niche areas and wind and water line) to be sufficiently cleaned and antifouled so that there is no more than a slime layer.'</i></p> <p>The current drafting of the plan rule does not provide the right balance between mitigating the spread of marine pests and the reality of the movement of vessels engaged in commercial fishing activities.</p> <p>Any implementation and monitoring of marine pests has to be cognisant of the realities of the NZ commercial fishing industry and other maritime users. The plan rule as it is currently drafted is more onerous than the MPI Craft Risk Management Plan for vessels coming into NZ waters.</p>	No relief stated	Note	<p>Staff acknowledge Fisheries Inshore NZ concern and recommends altering Plan Rule 1 to align with long-stay vessels under the Craft Risk Management Standard (CRMS) for Biofouling.</p> <p><u>Plan Rule 1</u> <i>The operator of a vessel entering the waters of the Hawke's Bays Regional Council Area (Figure 6) must ensure the hull (includes hull area, niche areas and wind and water line) or any structure or navigation aid of any origin, to be sufficiently cleaned and antifouled so that there is no more than a slime layer and/or goose barnacles.</i></p> <p>Staff also recommend the following text accompanies the rule under the Explanation heading:</p> <p><i>'International vessels that will be staying in New Zealand waters for up to 20 days and only visiting approved Places of First Arrival, remain under and must abide by the rules of</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>FINZ note that the current wording of the plan rule does not reflect section 73 6 of the Biosecurity Act 1993 (the Act) and would welcome discussion as to the drafting of the proposed rule with this in mind.</p>			<p><i>the Craft Risk Management Standard: Biofouling. International vessels staying for 21 days or more or visiting non-approved Places of First Arrival, however, must abide by the coastal plan rules of the relevant regional council/unitary authority, following completion of MPI biosecurity inspections in accordance with the CRMS.</i></p> <p><i>International vessels arriving in New Zealand waters have additional obligations under the Craft Risk Management Standard: Biofouling on Vessels Arriving to New Zealand (May 2014)'.</i></p> <p>This rule and explanation have been drafted with Ministry for Primary Industries support</p>
15.5	Fisheries Inshore NZ Limited	<p>In line with clause c of section 73 6 of the Act, inserted below, we propose that in the first instance site led monitoring is limited to specified parts of the region, notably monitoring of the larger ports such as Napier and Ahuriri.</p> <p>A rule may—</p> <p>(a) apply generally or to different classes or descriptions of persons, places, goods, or other things:</p> <p>(b) apply all the time or at 1 or more specified times of the year:</p> <p>(c) apply throughout the region or in a specified part or parts of the region with, if</p>	<p>Propose that in the first instance site led monitoring is limited to specified parts of the region, notably monitoring of the larger ports such as Napier and Ahuriri.</p>	<p>Reject</p>	<p>It is not the place of the Plan to specify where monitoring will be undertaken. This will be detailed in the Annual Operational Plan and will vary from year to year dependant on risk. That said, Council will initially focus on 'high risk areas' which includes the port and marina areas.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>necessary, another rule on the same subject matter applying to another specified part of the region: (d) specify that a contravention of the rule creates an offence under section 154N(19).</p>			
15.6	Fisheries Inshore NZ Limited	<p>The draft rule text and associated supporting explanatory text in the proposed pest management plan does not adequately detail how this rule is proposed to work in practice as required by section 70 2(f) of the Act. There is not enough detail on the rule with regards to:</p> <ol style="list-style-type: none"> a. Its interpretation b. How it will be enforced c. how compliance will be achieved and who will determine / certify if a vessel is clean d. what will happen if a vessel is found to be fouled 	<p>No relief stated but implies more detail is required in explaining the rule.</p>	<p>Accept in part</p>	<p>Section 70 2(f) of the Biosecurity Act states: 'if the plan would affect another pest management plan or a pathway management plan, how it is proposed to co-ordinate the implementation of the plans'.</p> <p>Please note recommended changes in No. 15.4</p> <p>Section 3.1 of the Proposal states that the Hawke's Bay Regional Council is proposed to be the management agency. As stated in Section 6.1 (pg 33) Appropriate measures drawing on requirement to act, council inspection, service delivery, advocacy and education activities described in section 5.3 (Principal measures to manage pests) of the Proposal will be used to achieve the Objective.</p> <p>Plan Rule 1 Explanation clearly states that if you are the operator of a vessel entering Hawkes's Bays waters (Figure 6), you need to:</p> <ul style="list-style-type: none"> • regularly clean and antifoul your vessel's hull and niche areas. Ensure they are kept free of biofouling and that your

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>antifouling paint is in good condition and working effectively</p> <ul style="list-style-type: none"> • clean hull and niche areas when your vessel has been stationary for periods of time. <p>The Plan also states that ‘an operator or the person in charge of a vessel, must take all reasonable steps to comply with this rule. Any vessel that does not meet the requirements of this rule is likely to be directed to take action to mitigate the risk.’ Action will depend on the level of risk, with high-risk vessels likely being required to either be hauled out of the water to be cleaned or being directed to leave the region.</p> <p>Please also note No. 15.1 and 15.5</p>
15.7	Fisheries Inshore NZ Limited	<p>The proposed rule wording is not consistent with other regional council policies for managing marine pests contravening section 71A of the Act which states that in making a regional pest management plans the plan must not be inconsistent with:</p> <ul style="list-style-type: none"> (i) the national policy direction; or (ii) any other pest management plan on the same organism; or (iii) any pathway management plan; or 	<p>Proposed rule wording is not consistent with other regional council policies for managing marine pests contravening section 71A of the Act. Request a meeting with HBRC to facilitate communication and co-operation to enhance effectiveness, efficiency, and equity of the</p>	Reject	<p>Staff worked with the Top of the North Marine Partnership (members: Northland Regional Council, Auckland Council, Waikato Regional Council, Bay of Plenty Regional Council, Gisborne District Council, Hawke’s Bay Regional Council, DOC, Ministry for Primary Industries) in creating the proposed rule wording. MPI have reviewed the rule wording and do not believe it to be inconsistent with Section 71 of the Biosecurity Act. Different regions listing different marine pests and having varying</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>(iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991; or</p> <p>(v) any regulations; and</p> <p>In line with section 12B of the Act, we request a meeting with HBRC to facilitate communication and co-operation to enhance effectiveness, efficiency, and equity of the proposed marine pest eradication programme.</p> <p>As outlined by the proposed pest management plan education is identified as a principle approach to achieving this plan. Taking this into account it is necessary that the HBRC work with vessel owners to ensure an appropriate rule is drafted.</p>	proposed marine pest eradication programme		wording does not make a Plan inconsistent. It is when a Plan contradicts or contravenes another Plan that it becomes inconsistent.
15.8	Fisheries Inshore NZ Limited	<p>Risk based framework</p> <p>Whilst, the management plan sets out the statutory obligations and provides an explanation on the rule the information contained in the 2018-2039 Management Plan does not provide sufficient detail on the risk-based framework. The development and implementation of a risk-based management framework requires substantial collaboration with stakeholders to promote a transparent development process. Stakeholder engagement will also enable the HBRC to ensure the risk-based approach reflects the reality of maritime user operations.</p> <p>We acknowledge that the use of risk-based management approach and a risk framework may</p>	Plan does not provide sufficient detail on the risk-based framework	Note	<p>It is not the purpose of the Plan to outline the implementation of a risk-based framework. This is the place of an Operational Plan.</p> <p>Staff agree it is important to involve key stakeholders as stated in the Plan: <i>'Considerable emphasis will be placed on developing partnerships with other organisations and community groups that hold expertise or interest in protecting the environment, and in particular the marine space'</i>.</p> <p>This includes developing and implementing a risk analysis to detect and respond to high</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>enable effective timely management of marine pest risks posed by vessels entering Hawke’s Bay waters. Further details of the scope and implementation of this risk-based framework is still required.</p> <p>A matrix detailing the risk-based framework would assist in stakeholders providing feedback on this approach as part of the consultation process.</p>			risk vessels entering Hawke’s Bay waters of which stakeholders will be a part of.
15.9	Fisheries Inshore NZ Limited	<p>Monitoring As stated in the 2018-2039 Management Plan “Both organisms are highly invasive and quickly form dense beds competing with native species for food and space.” Supported by the cost benefit analysis document which specifies that Styela multiplies rapidly and can therefore establish itself very quickly.</p> <p>The biological nature of these organisms and the voracity with which they can become established warrant monitoring. Based on the information in paragraph 25 we support the monitoring and reporting for Sabella and Styela.</p>	Support the monitoring and reporting for Sabella and Styela	Accept	
15.10	Fisheries Inshore NZ Limited	Aligned with the monitoring proposal it is notable that that presence of Styela can be indicative of poor water quality. Given the high-risk areas associated with Styela anticipated to be Napier and Ahuriri ports it would be appropriate to ensure that water quality within these areas is monitored to inform the exclusion programme as declining water	<p>clarify:</p> <p>a. the site selection of the proposed high-risk areas identified for monitoring.</p>	Note	<p>The monitoring programme will be risk based, of which water quality is one component.</p> <p>Council is currently in discussions with MPI to include the Napier port in its targeted surveillance programme. Staff would</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>quality could promote the spread of <i>Styela</i> in the event that an individual is brought into the area.</p> <p>We request the further rationale is provided to clarify:</p> <p>a. the site selection of the proposed high-risk areas identified for monitoring. As per our submission on 7 July 2017, it is rationale that marine pest surveys are conducted at both Ahuriri Harbour and Port of Napier, yet we note that MPI's targeted marine surveillance programme targeting high-risk ports does not include Napier.</p> <p>b. Whether HBRC intend to utilise water quality monitoring as part of the exclusion programme as per the comments made in paragraph 12.</p>	<p>b. Whether HBRC intend to utilise water quality monitoring as part of the exclusion programme.</p>		<p>welcome the support of Fisheries Inshore NZ in these discussions.</p>
15.11	Fisheries Inshore NZ Limited	<p>Summary and position FINZ has prepared this submission on behalf of the Area 2 Committee representing the interests of Area 2 quota owners and fishers.</p> <p>In principal we support the development of an exclusion programme for <i>Styela</i> and <i>Sabella</i> and note that the CBA identified that the benefits of regional intervention, outweigh the cost and exceed the benefit of an individual's intervention.</p> <p>Whilst supportive of the principal of the exclusion programme we do not support the proposed rule as it is currently written and have reservations</p>	Summary of position	Note	Please refer 15.1 to 15.10

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		regarding how the rule is interpreted, implemented and enforced			
16.1	Ministry for Primary Industries	<p>1. Consistency with the National Policy Direction</p> <p>We have not identified any inconsistencies with the National Policy Direction for Pest Management within the proposed plan or the associated Cost – Benefit and Cost Allocation analyses. However we would like to make a comment on the Good Neighbour Rule for possums (Plan rule 11).</p> <p>Rules within a plan, must be clear enough that a land occupier can easily understand the obligations and whether the rule applies to them. We do not feel that plan rule 11 meets this expectation. We consider the rule needs to be edited for clarity.</p>	<p>Suggested wording</p> <p>“An occupier within, or adjacent to, a Possum Control Area, shall, on receipt of a written direction from an Authorised Person maintain possum densities on their land at or below 4% residual trap catch) within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also maintaining possum densities on their land at or below 4% residual trap catch, in order to protect economic well-being and environmental values. All possum control must be carried out in accordance with the Hawke’s Bay Regional Possum Control Technical Protocol (PN 4969)</p>	Accept	<p>Staff agree that the suggested wording is easier to interpret and recommends incorporating this in the Plan:</p> <p><i>‘An occupier within, or adjacent to, a Possum Control Area, shall, on receipt of a written direction from an Authorised Person maintain possum densities on their land at or below 5% residual trap catch) within 500 metres of the adjoining property boundary where the occupier of the adjoining property is also maintaining possum densities on their land at or below 5% residual trap catch, in order to protect economic well-being and environmental values. All possum control must be carried out in accordance with the Hawke’s Bay Regional Possum Control Technical Protocol (PN 4969).’</i></p> <p><i>‘This rule does not apply where an occupier of land has entered into a Written Management Agreement approved by Hawke’s Bay Regional Council.’</i></p> <p>Please note that staff are recommending changing the residual trap catch requirement to 5% for the Good Neighbour Rule as a result of submissions.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			This rule does not apply where an occupier of land has entered into a Written Management Agreement approved by Hawke's Bay Regional Council."		
16.2	Ministry for Primary Industries	<p>2. Marine Biosecurity</p> <p>General Comment from MPI</p> <p>MPI has a leadership role for biosecurity and manages biosecurity risks offshore, at New Zealand's border and within New Zealand. This includes setting border standards for arriving vessels and goods, undertaking national high risk surveillance for high risk organisms, leading response to pest incursions, and providing leadership for pest management activities.</p> <p>In our pest management leadership capacity, MPI is working with regional councils to build marine pest management capability and ensure regional pest or pathway management plan rules are consistent with, and give effect to the National Policy Direction for Pest Management and any other relevant national regulation. The New Zealand government has endorsed the "Anti-Fouling and In-Water Cleaning Guidelines – June 2013" (The Guidelines) developed jointly by Australia and New Zealand. The Guidelines aim to minimise both contamination and biosecurity risks associated with</p>	No relief stated	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		shore-based and in-water maintenance of vessels and moveable structures.			
16.3	Ministry for Primary Industries	<p>Inclusion of marine pests</p> <p>6.1 Pest to be managed under exclusion programmes</p> <p>MPI is pleased to see that <i>Sabella spallanzanii</i> (Mediterranean fanworm) and <i>Styela clava</i> have been added to this pest management plan.</p> <p>To enable the Council to take immediate action under this plan if required, MPI suggests that Council adds marine pests that are not currently in the Hawkes Bay region to the Exclusion Pests Programme. This would include <i>Eudistoma elongatum</i>, <i>Pyura doppelgangera</i>, <i>Charybdis</i> and <i>Undaria</i>.</p>	<p>Add other marine pests that are not currently in the Hawkes Bay region to the Exclusion Pests Programme. This would include <i>Eudistoma elongatum</i>, <i>Pyura doppelgangera</i>, <i>Charybdis</i> and <i>Undaria</i></p>	Reject	<p>Council does not currently have the capacity nor technical expertise to respond to this full suite of marine pests. Plan Rule 1 will help minimise the risk of these pests establishing in Hawke's Bay.</p> <p><i>Undaria</i> is already established in the Hawke's Bay region.</p>
16.4	Ministry for Primary Industries	<p>Plan Rule 1 on page 34. Explanation, First sentence: We suggest you add after the words "clubbed tunicate" "and other unwanted organisms or pests" as the two mentioned are not the only pests that it would be desirable to keep out of Hawkes Bay.</p>	<p>Suggest adding words "and other unwanted organisms or pests"</p>	Accept	<p>Although the primary purpose of Plan Rule 1 is to prevent human activity introducing Mediterranean fanworm and clubbed tunicate into the region, this rule will also minimise the spread of other marine pests. Staff recommend adopting the following wording as it acknowledges this point and makes it clearer to the reader:</p> <p><i>Explanation</i> <i>This rule is to prevent human activity introducing Mediterranean fanworm,</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<i>clubbed tunicate and other unwanted organisms or pests into the region via a fouled hull. Boat hulls are considered the primary vector for spreading these pests.</i>
16.5	Ministry for Primary Industries	The Hawkes Bay discussion document refers only to vessels but perhaps the Council should include a condition about marine equipment so no new marine pests are bought into the region on aquaculture equipment. We suggest amending the wording to “a vessel, structure or navigation aid of any origin”.	Amend wording to “a vessel, structure or navigation aid of any origin”.	Accept	Staff believe the suggested wording allows tighter measures to prevent marine pests entering the region and recommends the following amendment: <u>Plan Rule 1</u> <i>The operator of a vessel entering the waters of the Hawke’s Bays Regional Council Area (Figure 6) must ensure the hull (includes hull area, niche areas and wind and water line) or any structure or navigation aid of any origin, to be sufficiently cleaned and antifouled so that there is no more than a slime layer and/or goose barnacles.</i>
16.6	Ministry for Primary Industries	Paras 2 and 3 under Explanation: The Council describes some of what a vessel owner needs to do to keep their vessel clean but it reads as if they can do this in the HBRC area, rather than before they enter. This may be what you intended, but if not, you might want to make it neutral on that and just explain what needs to be kept in mind when cleaning.	Clarify whether a vessel owner needs to have a clean vessel prior to entering the region	Accept	Although the ultimate goal of this programme would be for all vessels owners to have clean hulls prior to entering our region, we acknowledge that this message is unlikely to reach all vessel owners in other regions who plan to enter our waters. Many vessels also make unscheduled stops in Hawke’s Bay due to rough weather conditions. Staff recommend altering the wording in the <i>Explanation</i> to the following:

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>If you're the operator of a vessel planning to enter Hawkes's Bays waters (Figure 6), you must undertake the following prior to entering:</i></p> <ul style="list-style-type: none"> <i>clean and antifoul your vessel's hull and niche areas. Ensure they are free of biofouling and that your antifouling paint has been applied in accordance with the coating manufacturer's instruction, is in good condition and working effectively;</i> <p><i>During your stay, you must clean hull and niche areas when your vessel has been stationary for periods of time.</i></p> <p><i>Please refer to the Anti-fouling and In-water Cleaning Guidelines (2013) on the Ministry for Primary Industries website which provide overarching guidance for in-water cleaning activities.</i></p> <p>Council is taking a pragmatic approach whereby education and awareness with key stakeholders will be the primary focus, not undue enforcement under the Biosecurity Act. Key stakeholders are already working with Council, actively reporting vessels entering our region with fouled hulls to Council.</p>
16.7	Ministry for Primary Industries	Para 2, 1st bullet: add the words: "has been applied in accordance with the coating manufacturer's instructions" after the words "your antifouling	Para 2, 1st bullet: add the words: "has been applied in accordance with the		Please refer No.16.6

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		paint". It may also be useful to state that the cleaning method used must be in accordance with the coating manufacturer's recommendations. In addition you may wish to reference the Anti-fouling and In-water Cleaning Guidelines (2013) which provide overarching guidance for in-water cleaning activities.	coating manufacturer's instructions" and reference the Anti-fouling and In-water Cleaning Guidelines (2013).	Accept	
16.8	Ministry for Primary Industries	<p>3. Wilding Conifers</p> <p>In relation to the management of wilding conifers we would like to make the following points regarding the inclusion of wilding conifer species with the plan.</p> <p>Page 51: Objective 5</p> <p>Over the duration of the Plan, progressively contain and reduce the geographic distribution or extent of:</p> <p>(i), pinus contorta, within the Hawke's Bay region, and to prevent adverse effects on economic well-being and the environment of the Region.</p> <p>Consider including the following overarching objective taken from the NZ Wilding Control Management Strategy 2015 - 30 (the Strategy): "To prevent the spread of wilding conifers, and to contain or eradicate established areas of wilding conifers by 2030". Consider, also, MPI's submission on scope (below).</p>	<p>Consider including the following overarching objective taken from the NZ Wilding Control Management Strategy 2015 - 30 (the Strategy): "To prevent the spread of wilding conifers, and to contain or eradicate established areas of wilding conifers by 2030". Consider, also, MPI's submission on scope (below).</p>	Accept	<p>Staff recommend the following text be added under Explanation (pg 53):</p> <p><i>The Pinus contorta programme is in accordance with the NZ Wilding Control Management Strategy 2015 - 30 (the Strategy), which has the following objective: "To prevent the spread of wilding conifers, and to contain or eradicate established areas of wilding conifers by 2030".</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons						
		<p>The National Wilding Control Management Programme has been developed to implement the Strategy. The Strategy and the Programme recognise there are numerous pest conifer species that are a risk to biodiversity and have adverse effects on economic wellbeing and the environment. The Plan and the Programme support progressive containment, and taking an integrated approach will advance shared aims and objectives.</p>									
16.9	Ministry for Primary Industries	<p>Page 49-50, Part 6.3.8 Pinus Contorta</p> <p>Support in part</p> <p>MPI recommends extending the Plan's scope to include Wilding Conifers as defined below. Recommended Wilding Conifer Definition: Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 1, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees.</p> <p>Table 1</p> <table border="0" data-bbox="392 1276 981 1372"> <tr> <td data-bbox="392 1276 705 1308">Common Name</td> <td data-bbox="705 1276 981 1308">Scientific Name</td> </tr> <tr> <td data-bbox="392 1308 705 1340">Douglas fir</td> <td data-bbox="705 1308 981 1340">Pseudotsuga</td> </tr> <tr> <td data-bbox="392 1340 705 1372">menziesii</td> <td data-bbox="705 1340 981 1372"></td> </tr> </table>	Common Name	Scientific Name	Douglas fir	Pseudotsuga	menziesii		Support in part	Accept in Part	<p>Staff have held conversations with members of the North Island Wilding Conifer Group and recommend the following three species be added to the Plan as progressive containment, in a defined area encompassing the ranges and foothills:</p> <ol style="list-style-type: none"> 1. Scots pine <i>Pinus sylvestris</i> 2. Dwarf mountain pine <i>Pinus mugo</i> 3. mountain pine <i>Pinus uncinata</i> <p>Staff do not believe the remaining species in Table 1 warrant inclusion due to not currently being considered high risk in the Hawkes Bay region. Staff believe focusing efforts on the current high risk species, primarily being <i>Pinus contorta</i>, is the best use of resources. An increase in resources would be required if all species in Table 1 were to be included in the Plan.</p> <p>Staff recommend the species listed in Table 1 that are currently not included in the Plan</p>
Common Name	Scientific Name										
Douglas fir	Pseudotsuga										
menziesii											

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Lodgepole or contorta pine Pinus contorta Scots pine Pinus sylvestris Dwarf mountain pine and mountain pine Pinus mugo and P.unicinata Bishops pine Pinus muricata Maritime pine Pinus pinaster Ponderosa pine Pinus ponderosa Corsican pine Pinus nigra European larch Larix decidua Radiata Pine Pinus radiata</p> <p>Wilding conifers are introduced conifers that have mainly established naturally as a result of natural seed spread. This process has been exacerbated by landowners failing to take action when wilding conifers first occur, and much of the ongoing wilding conifer spread in New Zealand is generated from existing areas of reproducing wilding conifers. Much of the initial wilding conifer spread originated from a range of sources, particularly historic or 'legacy' plantings, such as Crown plantings for erosion control and research; long-established shelterbelts and amenity plantings on private and pastoral lease land; and in some locations, from woodlots and forest plantations.</p> <p>Wilding conifers are produced by many different introduced conifer species. Ten conifer species are recognised as currently contributing most to the wilding conifer problem in New Zealand. While some of these species now have little or no commercial value and are no longer planted, or much less frequently planted than in the past, several of these species, particularly Radiata pine</p>			<p>be added as Organisms of Interest, (except <i>Pinus radiata</i>),</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>(<i>Pinus radiata</i>) and Douglas fir (<i>Pseudotsuga menziesii</i>), are highly valuable commercially grown species that contribute significantly to forestry exports.</p> <p>MPI recommends extending the Plan's scope to include other conifer species. <i>Pinus contorta</i> is only one of a number of conifer species that are generally regarded to be a pest plant. In order to enable the regulatory control of at least some planted conifers where they pose a wilding conifer spread risk, and at the very least to prevent new plantings of these species, it is recommended that, in addition to specifying wilding conifers as pests using the definition set out above, the Plan also specify the following introduced conifer species as pests:</p> <p>Lodgepole or contorta pine <i>Pinus contorta</i> Scots pine <i>Pinus sylvestris</i> Dwarf mountain pine and mountain pine <i>Pinus mugo</i> and <i>P. uncinata</i> European larch (excluding sterile hybrids) <i>Larix decidua</i></p> <p>Some of the species that cause wilding conifers have very limited commercial value, but can be highly invasive, and therefore it may be appropriate to specify these species as pests in their planted state, in addition to being pests under the wilding conifer definition in their naturally regenerated state. This would effectively prevent new plantings of these species, as well as enable regulatory control requiring removal of these</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>species in situations where they are planted but pose a wilding conifer spread risk.</p> <p>Contorta in particular, is the most invasive introduced conifer species and represents a significant proportion of all wilding conifers and original sources of wilding conifer spread. Contorta is already an unwanted organism under the BSA, but is specified as a pest and subject to rules in only some current RPMPs.</p> <p>Other low value but highly invasive conifer species that could also potentially be specified as pests are Scots pine, Dwarf mountain pine, Mountain pine, and European larch. In the case of European Larch, the intent here is to address early plantings that cause ongoing wilding spread, rather than the sterile hybrids that tend to be used in more recent plantings.</p> <p>A key factor in recommending that these species be separately specified as pests is to enable control of them in their planted state where they are causing wilding conifer spread and/or threaten particular values through the spread of wilding conifers, as a means of supporting and contributing to wilding conifer outcomes. Consequently, these species would ideally be managed under the same RPMP programme as wilding conifers, but could potentially also be managed under a different programme in a different part of the region.</p>			
16.10	Ministry for Primary Industries	Page 43: part 6.3 Progressive Containment Support in part	Support in part	Accept in part	Please refer No. 16.9

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		MPI supports a modified Progressive Containment programme to include the species identified above			
16.11	Ministry for Primary Industries	<p>Page 52: Plan Rule 5</p> <p>Except where an occupier of land has entered into a Written Management Agreement approved by Hawke’s Bay Regional Council, an occupier of land shall:</p> <p>(i) destroy all, Pinus contorta, on their land;</p> <p>A breach of this rule is an offence under section 154N (19) of the Biosecurity Act 1993.</p> <p>Explanation The reason for this rule is to prevent the spread of the plants to land that is currently free of infestations and to progressively increase the extent of clear land.</p> <p>Statutory obligation</p> <p>Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993. A breach of these rules creates an offence under section 154(O) of the Act.</p> <p>Support in part</p>	Support in part	Accept in part	<p>Staff recommend the following text be added under Explanation (pg 53):</p> <p><i>In producing a Written Management Agreement, Council will take into consideration if an occupier is participating in and or contributing to a Council managed or endorsed Wilding Conifer Management Plan, Strategy or Programme that specifies an approach for the progressive removal and / or management of the Wilding Conifers and other species identified in the Plan.</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>MPI supports modified rules to include the species identified above. MPI also recommends modifying the rule to take into account where an occupier is participating in and or contributing to a Council managed or endorsed Wilding Conifer Management Plan, Strategy or Programme that specifies an approach for the progressive removal and / or management of the Wilding Conifers and other species identified in the Plan.</p> <p>This advice takes into account recommended guidance prepared by MPI to assist regions in developing an integrated approach under the NZ Wilding Control Management Strategy 2015 - 30 and the National Wilding Control Management Programme.</p>			
16.12	Ministry for Primary Industries	<p>Page 27: part 5.4 The Plan does not expressly provide for GNR to apply to this pest. Oppose Recommend additional rule;</p> <p>“Occupiers shall destroy all wilding conifers on land they occupy within 200m of an adjoining property boundary prior to cone bearing, if control operations to clear wilding conifers or other reasonable measures to control wilding conifers have been undertaken on the adjoining property, within 200m of the boundary, since the commencement of the Plan.”</p> <p>There is a need to ensure that public funds that have been invested in control programmes will be secured by enforceable future maintenance requirements.</p>	Oppose	Reject	<p><i>Pinus contorta</i> is declared a pest under progressive containment. It therefore cannot be propagated, sold or planted. A GNR would only apply to the Crown. Council is working with the Department of Conservation as a member of the NZ Wilding Control Management Strategy 2015 – 30. Staff do not believe a GNR would provide any further value in the management of wilding conifers.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Wilding conifers are produced by many different introduced conifer species. While some of these species now have little or no commercial value and are no longer planted, or much less frequently planted than in the past, several of these species, particularly Radiata pine (<i>Pinus radiata</i>) and Douglas fir (<i>Pseudotsuga menziesii</i>), are highly valuable commercially grown species that contribute significantly to forestry exports.</p> <p>A regulatory back-stop is needed so that seed spread from commercially grown plantations can be managed, particularly in areas where publicly funded pest control programmes have been undertaken to the fullest extent possible. Also, any privately funded and voluntary control efforts should be similarly protected.</p>			
16.13	Ministry for Primary Industries	<p>4.Other Pests Pyp grass has been identified as an Unwanted Organism under the Biosecurity Act 1993. Pyp grass poses a significant threat to dune systems throughout New Zealand. In addition, Pyp grass was identified as a pest for eradication through the national priority pest programme exercise completed in December 2006 and added to the National Interest Pest Response programme. This programme also includes Phragmites which is included in the proposed RPMP.</p> <p>An eradication response for pyp grass in Hawke's Bay commenced at Blackhead in November 2000.</p>	<p>Add: Pyp Grass <i>Ehrharta villosa</i> to the pests under eradication programmes. Like Phragmites it is part of the NIPR programme and is also on the NPPA</p> <p>Monitoring 7.1 Measuring what the objectives are achieving Add: Pyp Grass to the Eradication Programmes</p>	Reject	<p>Pyp grass is part of the National Interest Pest Response (NIPR) programme and is managed by MPI. Council has not had any involvement in this programme. Council currently manages the Phragmites programme on behalf of MPI of which is included in the Plan. If no new pyp grass plants are found in Hawke's Bay before 2020, MPI's surveillance will end. This indicates MPI are confident pyp grass has been eradicated from the region. If new plants are found MPI should resume surveillance and control. If pyp grass is found elsewhere in the Hawke's Bay region, MPI</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>The application of various herbicides has considerably reduced the plant's presence and eradication appears achievable. The last plant was found in 2011/2012. The monitoring and surveillance will end in 2020, assuming that no new plants are discovered. The Department of Conservation carries out regular surveillance and monitoring under contract with the Ministry for Primary Industries.</p> <p>For consistency we recommend that pyp grass be added to the RPMP in the following ways;</p> <p>6.2 Pests to be managed under eradication programmes</p> <p>Add: Pyp Grass <i>Ehrharta villosa</i> to the pests under eradication programmes. Like Phragmites it is part of the NIPR programme and is also on the NPPA.</p> <p>Monitoring 7.1 Measuring what the objectives are achieving Add: Pyp Grass to the Eradication Programmes</p>			would be responsible for carrying out an eradication programme. Given the national distribution of pyp grass it is likely it will remain a national eradication programme managed by MPI. Adding pyp grass to this Plan would not provide any further value.
17.1	Department of Conservation	Section 1.1 Plan establishment Notwithstanding some of the specific submission points that follow, I strongly support the Council's initiatives to grow pest management programs in partnership with organisations and land owners.	Note	Note	
17.2	Department of Conservation	Sections 2.1 – 2.5 Strategic background.	Review the section to clearly identify those		The strategic background is not a requirement of the Biosecurity Act and has

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		I support the analysis and documentation of legislative and policy instruments summarised in the document. However, I submit that council could more thoroughly document those pest management, biodiversity and economic objectives and actions which may be better supported by legislative and policy instruments other than the Biosecurity Act.	objectives that can only be achieved via the Biosecurity Act as distinct from those objectives where Biosecurity Act powers are secondary to other mechanisms.	Reject	no impact on the Plan. The Plan is targeted at land occupiers in Hawke's Bay and has been drafted with this in mind. It is designed to be a summary, not an exhaustive description.
17.3	Department of Conservation	Section 4. Declaration of Pests I submit that the proposed plan is deficient in the detail of how the organisms to be declared pests satisfy the tests in S.71 & S.72 of the Biosecurity Act. In my Appendix to this submission the Department has identified many anomalies in the Cost Benefit Analysis examples it reviewed and is unable to be assured that "subjects" identified should be declared pests under a Regional Pest Management Plan.	Review cost benefit modelling and share results of other "tests" required to be met before a subject becomes subject to a pest management plan.	Accept in part	Staff agree to review its Cost Benefit Analysis on the basis of the feedback that Department of Conservation have identified in the provided appendix. Please note, the Department of Conservation have misinterpreted some of the data and methodology for some species. Staff have noted the value from a range of submitters including the Department of Conservation in the preparation of a broader regional Biosecurity strategy to more clearly articulate the role of the RPMP within the overall regional biosecurity framework.
17.4	Department of Conservation	Section 4. I submit that pest fish, particularly "Brown bull-headed catfish", Koi carp, Rudd, Tench and Perch that do not currently have any or any significant distribution in Hawkes Bay should have been included in the assessment of potential pests for inclusion in the plan as either exclusion or eradication pests. The importance of freshwater quality to the economy of Hawkes Bay suggests that not	Assessment of and inclusion of identified pest fish as exclusion or eradication pests if assessment is favourable.		The Department of Conservation has a programme of survey, education, signage, and in some situations, eradication of pest fish where possible. Staff are open to discussions with DOC in how we might manage invasive fish collectively outside this Plan. It is important to note the variety of legislation that governs freshwater fish in

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		considering these species for inclusion is a significant over-sight.		Reject	<p>New Zealand. For example under the Conservation Act 1987, to introduce any aquatic life (native or introduced fish, plants or invertebrates) into an area where they don't already occur, requires a permit from the Minister of Conservation, otherwise the person responsible could be liable for a fine of \$5,000.</p> <p>The taking and holding of some fish requires a special permit from the Ministry of Primary Industries. Approval of Fish and Game New Zealand is required to hold live sportsfish and Gambusia, or introduce fish or fish eggs to sportsfish or game bird habitats. Perch and tench are classed as a coarse fish under section 26R (3) of the Conservation Act 1987 and are managed by Fish and Game New Zealand.</p>
17.5	Department of Conservation	<p>Section 4.2 Other organisms that may be controlled.</p> <p>Several organisms with limited distribution in Hawkes Bay but known to have significant costs elsewhere are included in the "OOI" list. I note in particular; Boneseed, Climbing spindle berry, Hornwort, Mothplant, Parrots feather and Purple ragwort. I submit that a more comprehensive consideration of whether or not these species should be considered as exclusion, eradication or progressive containment pests is warranted.</p>	<p>Review and document proposed status for Boneseed, Climbing spindle berry, Hornwort, Mothplant, Parrots feather and Purple ragwort including a cost benefit analysis.</p>	Reject	<p>There are many organisms capable of causing adverse effects, particularly to biodiversity values. However not all organisms are required to be declared as pests within the Plan. Council undertakes pest control on species outside of this Plan, including boneseed, mothplant and purple ragwort. The "OOI" list is a process for watch-listing these pests for ongoing surveillance or future control opportunities.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
17.6	Department of Conservation	<p>Section 4.2 Other organisms that may be controlled.</p> <p>I submit that coordinated input into the control of wasps by council would have a positive benefit for the Region. It is my contention that a site-based approach involving direct control at sites administered by HBRC and sustained control via coordinated actions such as bio control and information support for landowners throughout the Region would be appropriate.</p>	Reconsider pest status for wasp species	Reject	Wasps are included in the plan as Organisms of Interest. Council considered the inclusion of wasps into a site-led programme but due to a lack of effective tools and cost of implementing a programme resulted in wasps being placed as an “OOI”. Hawke’s Bay Regional Council is also a partner in funding the <i>Vespula</i> wasp biocontrol project.
17.7	Department of Conservation	<p>Section 4.3 Unwanted Organisms</p> <p>I support the intent behind inclusion of commentary on “Unwanted Organisms (UO)” but submit that the section should be edited and enlarged to reduce confusion. It is my contention that the first paragraph of the section should broadly cover the restrictions imposed by UO status particularly the restrictions on sale, propagation and distribution. Detail of the National Interest Pest Response programme and the National Plant Pest Accord would then be in context as “subsets” of the UO group of pests.</p>	Revision and reordering of section	Accept in part	<p>Staff recommend this section is edited as follows:</p> <p>4.3 Unwanted Organisms</p> <p><i>An unwanted organism is any organism that’s capable of causing harm to natural or physical resources (like forests and waterways) or human health. A number of introduced pests in New Zealand are classed as unwanted. Undaria and wallabies are just 2 examples – they both have the potential to cause serious environmental harm if allowed to spread throughout New Zealand. Under the Biosecurity Act 1993, it’s an offence to breed, sell or release these organisms.</i></p> <p><i>Some of these unwanted organisms are subject to national action under the National Interest Pest Response (NIPR) programme managed by Ministry for Primary Industries (MPI). With the exception of phragmites,</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>none of the other eight species subject to the NIPR are known to be present in Hawke's Bay. Phragmites is included in the Proposal (under the eradication programme) as part of the collective assistance being provided by the Council to the NIPR programme. For the most up-to-date list of Unwanted Organisms, visit the MPI website.</i></p> <p><i>The National Pest Plant Accord (NPPA) currently targets 113 plant species all of which are declared Unwanted Organisms. NPPA is a cooperative agreement between the Nursery and Garden Industry Association, regional councils and government departments with biosecurity responsibilities. It seeks to prevent the sale and/or distribution of the specified plants where either formal or casual horticultural trade is the most significant way of spreading the plants in New Zealand. The most up-to-date list of Accord species is also available on the MPI website. A description of the NPPA can be found in Section 2.3.4</i></p> <p>Please note it is not a requirement for the Plan to have a section on Unwanted Organisms and has no impact on the Plan. The National Pest Plant Accord is covered in Section 2 <i>Planning and statutory background</i> within the Plan.</p>
17.8	Department of Conservation	Section 4.3 Unwanted Organisms			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		Some “harmful organisms” are classified as noxious fish. This classification imposes significant restrictions on persons who may wish to propagate or spread these organisms and give HBRC staff access to authority to survey for and/or destroy the organisms. It is my submission that inclusion of a description of this classification in the plan would highlight, to occupiers, the limitations that are imposed on them by national pest management decisions and policies such as the noxious fish designation.	Add description of pests covered by noxious fish status, what powers HBRC staff can access and summarise obligation of occupiers with respect to these species	Reject	Pest fish are not part of this Plan. Please refer to No 17.4.
17.9	Department of Conservation	Section 5.3 I submit that the proposed ‘written management agreement’ facility and process is currently designed to provide for resolution of single property to single property ‘conflicts’. This is likely to be highly complex and costly (for both the Crown and Council) with respect to Crown Agencies because single large areas of Crown land will border multiple private properties. It is my view that section 5.3 should be reviewed to provide an effective and efficient mechanism for agreed delivery against Good Neighbour Rules by Crown agencies. (I refer Council to S.4.4. of Horizons RPMP as a possible model).	Review S. 5.3 to facilitate efficient ‘written management agreement’ process between Crown agencies and Council.	Accept	Staff acknowledge the Department of Conservation position and recommends including the following paragraph under <i>Section 3.3.2</i> : <i>In some circumstances it may be appropriate for the Council and a Crown agency/SOE to negotiate an agreement of specific actions and timeframes to bring about compliance with the Plan, or otherwise achieve the outcomes of the Plan (through alternatives to meeting the rule framework). In these instances a Written Management Agreement will be drafted and signed between Council and a Crown Agency. The Written Management Agreement may set out a range of matters, including (where applicable) any exemption granted in accordance with the exemption process detailed in Section 8.3 of the Plan. Written</i>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>Management Agreements are discussed in further detail in Section 3.3.5. Where a Written Management Plan has been agreed and is adhered to it will meet the Crown agencies obligations under this plan.</i></p> <p>Staff also recommend the following statement be added under Section 3 <i>Responsibilities and obligations:</i></p> <p>3.3.5 Written Management Agreements <i>A Written Management Agreement is a documented pest management agreement that describes the levels of service for management of pests. They are written usually as an alternative to achieving the specifications contained in that rule on the level of pest clearance or timing of the delivery of the service. Key elements of a Written Management Agreement will likely include but limited to:</i></p> <ul style="list-style-type: none"> • <i>a map showing the known distribution of the pest;</i> • <i>the control works to be undertaken (including physical and/or chemical control methods);</i> • <i>identify an area/s within which the Council will undertake a search and/or control works;</i> • <i>state any pathway management requirements to be followed;</i>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<ul style="list-style-type: none"> state any restrictions placed on the property e.g. restrictions on production of hay/silage. <p>The intent of a Written Management Agreement is to meet the objective by reducing the spread of that pest from the place(s) that they occupy through a pragmatic approach. Hawke's Bay Regional Council Biosecurity Manager or their delegate must be satisfied that the Written Management Agreement will meet that objective.</p>
17.10	Department of Conservation	Section 5.3.3 I support the sourcing and distributing of biological control agents (where appropriate) by Council.	Note support	Note	
17.11	Department of Conservation	Section 6.1 Notwithstanding my concerns with the cost benefit analysis (CBA) outlined in my submission points below and in Appendix 1 and the absence of 'pest fish' from the list, I strongly support Council in its planned approach to exclude the listed pests not yet established in the Region. It is my contention that even a very conservative cost benefit analysis clearly establishes the long-term value to the Region of excluding pests that are not yet established.	Note strong support	Note	
17.12	Department of Conservation	Section 6.2			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		I generally support objective 2 being the eradication of 8 identified pest plants. My reservation arises from uncertainty as to whether the cost benefit analysis supports the objective. Further to my general concerns about the CBA outlined in my submission points below and in Appendix 1, I note discrepancies between the assumptions and data in the CBA in comparison to the plan details. E.g. the CBA states that the current infested area for African Feather Grass is 1 hectare whereas the proposed plan states that the current known infestation is 1260 hectares. Similar variation exists for Phragmites, White-edged nightshade and yellow water lily. I am unable to identify whether the CBA analysis would be materially impacted by eradication proposals starting with greater infestation levels.	Review CBA for proposed eradication plants and consider alternative program objectives if necessary	Accept in part	The submitter has misinterpreted the Cost Benefit Analysis data. The larger figure referred to in the plan is the extent of the known infestation. Although this figure may seem high to the reader, the actual pest density within this area is very low. The lower figure produced in the Cost Benefit Analysis is the predicted density of the pest of which the impacts are calculated on. Moreover the results of a Cost Benefit Analysis give an indication of the benefits of the proposed programme and risks to success. It is not a standalone tool that should be used to test the feasibility of whether a pest should be placed in Eradication or Progressive Containment. This is a decision made by Council based on a range of factors, including technical feasibility, policy and compliance risk. The Cost Benefit Analysis is one component of this. Staff will work through Appendix 1 from the submission with Lincoln University and Wildlands Consultants in reviewing the Cost Benefit Analysis.
17.13	Department of Conservation	Section 6.2.9 In my view this objective is poorly developed and explained and is not supported by CBA. The lack of certainty for occupiers as to whether they are affected by the proposal is inconsistent with the National Policy Direction for Pest Management (NPD) and the text in both the proposed plan and	Review of the possum eradication proposal and associated technical protocol to clarify objectives, clearly identify the cost benefit assessment for this objective, clearly identify	Accept in part	This information is contained within the Hawke's Bay Regional Possum Control Technical Protocol (PN 4969) which sits alongside the Regional Pest Management Plan and is linked to the plan under the Biosecurity Act 1993 through Incorporation by Reference. This document is available on

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>the 'Possum control technical protocol' is confusing and contradictory. I note in particular;</p> <ul style="list-style-type: none"> • Eradication can only be eradication. Eradication 'where possible' in the identified areas is simply a form of sustained control. It is unclear whether this discussion refers to the region as a whole or the proposed eradication areas. • The plan states (pg. 42) that the option of possum eradication was not included due to not having the tools to achieve this goal. • The possum control technical protocol references 'Map two'. This map does not exist. 	<p>the affected areas and establish consistency with the NPD.</p>		<p>the HBRC website alongside the Proposed Regional Pest Management Plan.</p> <p>Staff agree that parts of this Technical Protocol could be included in the plan to make it clearer to the reader. Staff recommend including the following text in the Plan under <i>Section 6.2.9 Possums</i>:</p> <p>Purpose <i>Possums cause significant adverse impacts across a range of values within the Hawke's Bay region and have been the subject of a substantial community investment to minimise these pest impacts over the last two decades. The eradication of possums on farmland will allow these adverse impacts to cease and provide a significant opportunity for the community to shift resources currently applied to possum control towards controlling predator pests such as mustelids, feral cats and rats. Large scale control of these additional predator pests will allow the region to realise a much greater range of economic and environmental benefits while minimising additional costs to the community.</i></p> <p>Process for forming a Possum Eradication Area <i>A Possum Eradication Area is created once written agreements have been entered into with 75% or more of the total proposed land area. The Council will undertake possum eradication work</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>within the entire Possum Eradication Area. Once possum eradication commences, land occupiers within the area are required to comply with the Hawke's Bay Regional Possum Control Technical Protocol (PN 4969). A Possum Eradication Area is defined as an area identified as a Possum Eradication Area within the Hawke's Bay Regional Possum Control Technical Protocol (PN 4969). All Possum Eradication Areas will be mapped and inserted into this Protocol once the 75% land area threshold has been reached and initial control work has been completed within the area. Once the Council has given notice to affected land occupiers and in the NZ Gazette that this Protocol has been amended to include an additional map, the map will have legal effect as part of the Hawke's Bay Regional Pest Management Plan 2018 - 2038. Therefore occupiers within that mapped area will be required to comply with the requirements within the Protocol after 75% or more have agreed to participate and from the date specified in the letter to land occupiers and the Gazette notice. This Technical Protocol is incorporated by reference into the Hawke's Bay Regional Pest Management Plan 2018 – 2038.</i></p> <p>The statement 'Eradication where possible' and 'the option of possum</p>

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					<p>eradication was not included' were omissions and staff recommend removing these from the plan.</p> <p>Map two within the protocol does not currently exist as this programme has not been initiated. Once the Plan is ratified and an area has gained the 75% threshold the protocol will be updated to include a Map. The protocol does however need a placeholder for a map, hence the title being in place.</p>
17.14	Department of Conservation	<p>Section 6.2.10</p> <p>As for proposed eradication plants I am uncertain whether the CBA supports the eradication objective. I consider there to be much greater uncertainty as to when or if eradication will be achieved than the CBA assumes. This uncertainty and the history of rook control in the region do not support the CBA's contention that the technical and operational risks of achieving the objective are low. I further note that the additional benefits of eradication (between today and 50 years time) are largely accrued by the horticulture land use class. That outcome is not reflected in the CBA analysis of who should pay.</p>	<p>Reappraise CBA and review whether eradication or sustained control should be the preferred approach.</p>	<p>Accept in part</p>	<p>Please refer to No 17.12</p>
17.15	Department of Conservation	<p>Section 6.3</p> <p>I note that the CBA analysis for Japanese Honeysuckle and Old Man's Beard are described for a "site led" approach rather than progressive containment.</p>	<p>Clarify whether the CBA for these species has been undertaken for the correct programme.</p>	<p>Note</p>	<p>Japanese Honeysuckle and Old Man's Beard were analysed for Progressive Containment but were labelled incorrectly. Staff recommend amending the CBA to assign correct programme titles.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
17.16	Department of Conservation	Section 6.3 submit that a progressive containment approach to pest control should include an estimate of the reduction in range for the particular species and that none of the species identified are described in such terms. I suggest that the programmes described should be more correctly identified as “sustained control” or “site -led”. Such a re-designation may impact on CBA. If progressive containment is to be pursued, then greater detail on the proposed focus of individual programmes is required.	Review inclusion of these species as ‘Progressive containment’ and review CBA if necessary.	Reject	The Proposed Plan is over a 20 year period. Staff believe stating a meaningful reduction for each pest plant over this period would be difficult and likely to be arbitrary. This is best addressed through the Operation Plan which will be produced within three months of this Plan being approved.
17.17	Department of Conservation	Section 6.3.4 and Section 6.3.5 Both Darwin’s barberry and Japanese honeysuckle are dispersed widely by birds and have significant impacts on natural values. While I support the identified objectives, I submit that HBRC should consider adopting wider a regional objective for these plants of minimising seed dispersal by seeking bio-control agents that reduce seed production or viability. I also submit that the CBA for Darwin’s barberry would support an eradication approach but I am not confident that the calculations are correct.	Identify Darwin’s barberry and Japanese honeysuckle as priorities for bio-control initiatives across the region	Note	Hawke’s Bay Regional Council is part of the National Biocontrol Collective, alongside DOC, and contributes annually towards research on new biocontrol agents. Council is planning to release two biological control agents for Japanese honeysuckle within the region in the 2018/19 financial year (stem boring weevil and white admiral butterfly). The long-term goal for Darwin’s Barberry is eradication therefore a biocontrol agent is not currently being sought.
17.18	Department of Conservation	Section 6.3.7 I submit that the proposed approach to OMB places significant conservation areas and water catchments at risk of forest collapse should this pest spread into sites such as the Ruahine and	Reconsider proposed approach to Old Man’s Beard.		Over half of the Hawkes Bay region (all land north of State Highway 5) is included in the Progressive Containment programme for Old Man’s Beard. This area includes the Poutiri Ao ō Tāne project, many QEII blocks, a large

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Kaweka Ranges. I further note the key sites in the Poutiri a tane project area are at risk from this plant under the plan proposed. I note that Horizons Regional Council have adopted an active management zone for this pest and that this zone provides a buffer of protection for key high-country catchments including the Ruahine Range. I submit that the proposed approach by HBRC will significantly jeopardise the objectives of their neighbouring council. I further submit that describing the area out of which council will try to keep OMB from establishment as a 'containment area' area is contradictory. In my view the currently infested area should be the containment area and that a programme be designed and adopted to prevent this weed spreading further.</p>		Reject	<p>number of DOC reserves and protects Te Urewera Ranges from infestation. There are large infestations of Old Man's Beard south of State Highway 5. Requiring land owners to control old man's beard would put a significant financial burden on these land owners.</p>
17.19	Department of Conservation	<p>Section 6.3.8 I submit that the lack of clear objectives for Pinus contorta control will jeopardise programme success and invalidate any CBA analysis. I note that in much of the rateable area of the region this species does not have a significant economic impact. Where it is having an impact, it is one of a suite of wilding conifer species that jeopardise the values at risk. The National Wilding control strategy includes a significant investment within Hawkes Bay and it is my contention that HBRC should seek to incorporate the goals of that strategy in its RPMP.</p>	Review P.contorta plan and extend in support of the National Wilding Control Strategy	Accept	Please refer to No 17.9

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17.20	Department of Conservation	<p>Section 6.3.1, 6.3.2, 6.3.3, 6.3.6, 6.4.9, 6.3.10, 6.3.11</p> <p>I support the council's intention to contain and reduce the impact, over time, of these 7 pests. However, I note that there is a lack of supporting evidence that the approach proposed will achieve the objective. As this approach has been applied to most of these pests over several previous versions of this plan I expected to see an analysis of progress made to date. (I note a typo in the section heading for Saffron thistle).</p>	Consider refining proposed programmes based on progress to date.	Note	<p>Council has taken a pragmatic approach when reviewing each pest and deciding which programme it will sit under. The decision not to list some of these pests under eradication is due to the biology of the plant e.g. seed life of over 50 years, current extent. This does not reflect failure or change the long-term goal of eradication of which many of these species will one day sit under.</p>
17.21	Department of Conservation	<p>Plan rule 5</p> <p>I submit that a plan rule requiring 'all' individuals on the occupier's land to be destroyed is inconsistent with the NPD and guidance material for progressive containment programmes. It would be an appropriate rule within an eradication objective or sections of the region identified for 'roll back' of the area of infestation under a progressive containment programme but not as a blanket requirement.</p>	Review plan rule 5	Reject	<p>Plan Rule 5 states (pg53):</p> <p><i>Except where an occupier of land has entered into a Written Management Agreement approved by Hawke's Bay Regional Council, an occupier of land shall:</i></p> <p><i>(i) destroy all....</i></p> <p>It is important to note that a land occupier is only required to control all individuals when they do not agree to enter a <u>Written Management Agreement</u>. This agreement will outline their responsibilities and will take many factors into account such as size of infestation, biology of pest, vector pathways, terrain, control tools available to them etc.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					Also please note, as per No. 17.20, the long-term goal for most pest plants under Progressive Containment is eradication. However under the NPD we could not list them under Eradication unless we were confident we could achieve this goal in the short to medium term. These pests are therefore included under Progressive Containment with a long-term goal of transitioning them to Eradication under future plan reviews. Allowing pest plants such as Apple of Sodom, woolly nightshade and Darwin's barberry, which are bird dispersed, to go uncontrolled would seriously impact the success of the programme and would allow the plants to spread potentially over very large distances. The Ministry for Primary Industries has no concerns with this approach and likewise is the same approach other Regional Councils are taking.
17.22	Department of Conservation	Section 6.4 I submit that CBAs for a sample of proposed sustained control species do not clearly identify a nett benefit to the Region of Regional intervention where those pests are already widespread.	Review CBAs and decision to proceed with a plan for widespread pests.	Reject	Please refer to No. 17.12
17.23	Department of Conservation	Section 6.4.1 I submit that the CBA, limited current distribution and potential impact area support a plan to contain or eradicate Chilean needle grass. However, I also submit that 'sustained	Reconsider objective for Chilean needle grass.	Reject	Please refer No.1.1

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		control' may be the incorrect objective for this pest.			
17.24	Department of Conservation	<p>Section 6.4.2</p> <p>I submit that while the CBA does not support planned intervention, public concern about the impact of this pest may provide sufficient justification for HBRC to take concerted action against this pest in urban areas. However, in my view the plan should provide more detail as to why council intend to impose costs on property occupiers.</p>	Review description of justification for proposed programme.	Reject	<p>Please note text under 'Explanation of rule':</p> <p><i>Upon receipt by Council of a doctor's certificate/positive blood test clearly showing a person to be suffering a privet allergy, Council will, within the urban area, destroy any isolated Chinese and tree privet plants within 50m of the residence or place of work of that person. If, upon inspection by Council, large numbers of plants exist, including as hedges, a direction will be served on the occupier to thoroughly prune to prevent flowering or destroy the plants.</i></p> <p>This removal will be paid for by Council. Plan Rule 8 has been included to give Council the ability to remove a privet tree within 50m of an affected land occupier if the adjacent land occupier refuses to allow Council to remove the privet tree. In this instance the person refusing to remove the privet tree is liable for the cost of removal.</p>
17.25	Department of Conservation	<p>Section 6.4.3</p> <p>Notwithstanding my concern that the CBA does not adequately account for occupier costs, I submit my support for the proposed Rule "9" because this rule supports the key outcome of sustained control being the</p>	Note support.	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		reduction of spread from one property to another.			
17.26	Department of Conservation	<p>Section 6.4.4</p> <p>I submit that the proposed plan for sustained control of possums is inadequately analysed in the CBA (see my Appendix 1) particularly with respect to the cost implications for DOC arising from the proposed GNR. I further submit that the arbitrary pest level of 4% residual trap catch rate (rtc) is not adequately supported with evidence that shows that this level of control is necessary to achieve the outcomes desired. I support the philosophy behind landscape scale minimisation of possum impacts but submit that a statutory Pest Management Plan is an inappropriate vehicle for achieving this and is inconsistent with the NPD.</p>	Review possum sustained control plan	Accept in part	<p>Please refer to No 17.9</p> <p>The proposed reduction in residual trap catch from 5% to 4% is to allow Council to better manage non-compliance within the Possum Control Programme. Being able to respond earlier and act faster will reduce the impacts of those not undertaking possum control on those who are actively controlling possums. This change has been drafted with Federated Farmers who support this approach in better managing non-compliance.</p> <p>Hawke's Bay Regional Council has been controlling possums through its Possum Control Area (PCA) programme since 2000. There has been a very high level of support for the PCA programme, and a strong belief by most land occupiers within the programme that it is providing value for money for programme participants. The programme has grown to over 700,000ha and is exceeding its target with an average residual trap catch (RTC) of 2.3% across all PCA programmes. This success and landowner support has provided the foundation for further strengthening PCA benefits. Staff are surprised and disappointed that the Department of</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>Conservation does not support this programme and has submitted that a statutory Pest Management Plan is an inappropriate vehicle for achieving this. In particular our collaboration together on the Cape to City and Poutiri Ao ō Tāne projects has had consistent support from the Department of Conservation for the RPMP as an appropriate mechanism for farmland predator pest management.</p>
17.27	Department of Conservation	<p>Section 6.4.5 I submit that the proposed plan for predator control is inadequately developed and in its current form is inconsistent with the NPD for pest management. Key inconsistencies are a lack of certainty for occupiers as to whether they are affected and CBAs that are not specific to the proposal. As for possums I support the philosophy behind landscape scale minimisation of predator impacts but submit that a statutory Pest Management Plan is an inappropriate vehicle for achieving this and is inconsistent with the NPD.</p>	Review sustained predator plan.	Reject	<p>A specific CBA was undertaken for this programme. Please refer to pages 152 – 160 in the Cost Benefit Analysis and Cost Allocation Report.</p> <p>Please refer to Section 6.4.5 Predators within the Plan which clearly articulates the programme and who could be impacted. For example, the following statements under <i>Background</i>:</p> <p><i>Integrating predator control alongside PCA programmes can provide a key platform for delivering additional economic and environmental outcomes to land owners.</i></p> <p><i>The Council will identify Predator Control Areas and will seek to enter into written agreements with individual landowners within those areas to undertake long term predator control maintenance. Once written agreements have been entered</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p><i>into with respect to 75% or more of the total land area, the Council will undertake initial predator control work within the entire Predator Control Area. After initial predator control work has been undertaken, occupiers within the area will be required to maintain the listed pests in accordance with the Hawke's Bay Regional Predator Control Technical Protocol.</i></p>
17.28	Department of Conservation	<p>Section 6.5 I submit that critical elements for 'site led' pest species are identification of the site and identification of the values to be protected at that site. Without that information a site led plan is inconsistent with the NPD.</p>	Describe sites and values to be protected under a site-led plan and review objectives.	Accept	<p>Staff recommend paragraph two under Section 6.5 <i>Pests to be managed under site-led programmes</i> be redrafted as per follows:</p> <p><i>This programme sets out to protect areas of ecological importance. These areas are defined as sites identified through:</i></p> <ul style="list-style-type: none"> • <i>Ecosystem Prioritisation (Hawke's Bay Regional Council)</i> • <i>Recommended Areas for Protection (Department of Conservation)</i> • <i>Sites of Special Wildlife Interest</i> • <i>Native plantings (only applies to feral goats through the good neighbour rule. Please refer to Plan Rule 15).</i> <p><i>These sites have been identified as having high biodiversity values in Hawke's Bay. The aim of identifying these sites is to enact protection and halt biodiversity decline. A copy of these sites can be provided on request from Hawke's Bay Regional Council.</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
18.1	Federated Farmers of New Zealand	<p>The Hawkes Bay Province of Federated Farmers and the Wairoa Branch of the Gisborne-Wairoa Province of Federated Farmers (collectively referred to henceforth as Federated Farmers) welcomes the opportunity to submit on the Hawkes Bay Regional Council (HBRC) Regional Pest Management Plan 2018-2038.</p> <p>Pest management is of primary concern to our members, given the impact it poses to their social and economic viability.</p> <p>INTRODUCTION</p> <p>Federated Farmers understands that HBRC is responding to changes to the Biosecurity Act 1993, including a new National Policy Direction for Pest Management 2015 (NPD-PM). The NPD-PM requires councils to undertake robust cost benefit analysis to determine species for inclusion in the plan, and to develop programme objectives that are specific, measurable and realistic. Only those species that require regulatory intervention will be included in plans.</p> <p>Federated Farmers would like to see a new Plan deliver timely and well-managed responses to incursions and appropriate controls of existing pests. Over the years, the focus of the Biosecurity Act 1993 and RPMSs has shifted from farm production to include landscape ecology and biodiversity protection. Pest management is acknowledged to deliver important shared benefits to the whole community, including health, indigenous biodiversity, economic production and</p>	No relief stated	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		cultural values. For this reason, we continue to push for alternative and more equitable funding sources and mechanisms for pest management.			
18.2	Federated Farmers of New Zealand	<p>FUNDING</p> <p>Plant and animal pests have the potential to adversely affect the production potential of farms, pose a health risk to stock and undermine farm conservation efforts. Federated Farmers thanks HBRC for the focus over the past 15 years, on pests affecting agricultural production.</p> <p>Section 1.1 of the Plan states “Although over the past 15 years approximately 80% of Council’s biosecurity budget has been spent on pests affecting agricultural production, there have been significant biodiversity gains arising from the delivery of these programmes.”</p> <p>Most farmers take the issue seriously and spend significant amounts of time and money (on average \$8 per hectare per year according to the Ministry for Primary Industries) on weed and animal pest management, whether they are required to under a Regional Pest Management Strategy (RPMS) or not.</p> <p>Currently, the Regional Council collects a targeted rate for animal and plant pest control, wherein all rateable rural land containing 4.0468 hectares (10 acres) and above in the region is rated on an area basis.</p> <p>Rating Units greater than 200 hectares where more than 90% of the land is covered in indigenous vegetation are excluded, which means they will be zero rated.</p>	<ol style="list-style-type: none"> 1. That the wider regional community is acknowledged as receiving benefit from pest and weed control resulting in improved biodiversity outcomes. 2. That the rates funding model for pest and weed control activities includes seeking funding from the wider regional ratepayers and not just farmers. 3. That a hybrid rates model with a flat fee for small <4ha properties is introduced alongside the area-based rate for larger properties, to ensure the amount sought from smaller properties remains financially viable for Council to collect. 	Accept in part	<p>Staff agree that funding for pest control needs to reflect those who benefit both locally and regionally from the proposed programmes as well as those who act as exacerbators. Moreover this point is a requirement under the National Policy Direction. Council undertook a cost benefit analysis and cost allocation process which assessed who the beneficiaries and exacerbators are for each programme and recommended how the programme should be funded. This includes seeking what is considered fair from the general community. An example of this is the new predator control area programme, which has a proposed funding ratio of 40% general, and 60% targeted, which deviates from the 30% general, 70% targeted rate for primary production pests. This rate is acknowledging the biodiversity benefits gained regionally, even though the programme will be undertaken almost exclusively on farmland and will additionally have primary production benefits.</p>

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		<p>A differential rate will be applied to those Rating Units that have between 40 and 400 hectares where more than 75% of the land is covered in production forestry, also any production forestry Rating Units over 400 hectares.</p> <p>The general public are increasingly demanding good biodiversity outcomes, and Federated Farmers considers that all ratepayers should contribute financially. Pest and weed control is no longer just for the benefit of farmers, but for the wider community. The Regional Pest Management Plan acknowledges this public good in Section 1.1 and we agree with the statement: “While in the past the majority of Biosecurity activities have been funded by the rural community, this Plan and the programmes proposed, reflect a shift which recognises that for some programmes which deliver increased biodiversity improvement the Regional Community are significant beneficiaries. Funding sources for those programmes have been reviewed to reflect this.”</p> <p>We support the shift to include the wider regional community as benefactors, and to seek funding from them. However the proposed 30% general rate still has the potential problem of collecting only very small amounts from urban properties, particularly because land value is used as a basis to strike the general rate.</p> <p>To enable all ratepayers to contribute in a way that is financially viable for Council to collect, Federated Farmers recommends a hybrid rates funding model, which introduces a flat charge per property</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>for smaller properties as well as the existing area based rate for larger. This will mean that smaller properties are contributing to control as both beneficiaries and exacerbators, while ensuring that the amount of revenue collected remains economic for Council.</p>			
18.3	Federated Farmers of New Zealand	<p>Federated Farmers reminds HBRC that there may be funding streams available to the Council other than rates, including private sector partnerships and project sponsorships, and access to Crown funding. We note that to achieve the goals of predator free 2050, the Government is committing an additional \$28 million over 4 years and \$7 million each year thereafter. We would like to see some commitment from the Council to investigating these alternative funding sources to better enable it to deliver services and ensure that the current focus on production pests is upheld if not further expanded.</p> <p>Federated Farmers believes that the Crown should contribute to pest management on the same basis as any other land occupier within the region. We understand that this is in line with the Department of Conservation (DOC's) "war on weeds", in which they acknowledge that hundreds of invasive weeds are smothering our native forests, wetlands and coastal areas, harming our wildlife and transforming our natural landscapes (DOC, 2016). The challenge for HBRC is to ensure animal pests on non-rateable, Crown, DOC and Council land are</p>	<p>4. That more funding from Crown occupiers is sought to reflect their beneficiary and exacerbator status under the Plan.</p>	<p>Note</p>	<p>Council has been actively seeking partnerships with others aligned to our goals. Through the Cape to City and Poutiri Ao ō Tāne projects over the last three years more than \$4m has been invested in the region by philanthropic and other partners. The significant majority i.e. 80% or more of this funding has been invested into our farmland context. Council has also sourced funding through the DOC dirty dozen programme, and MPI's Wilding Control Management programme. Council has been actively forming collective partnerships with organisations and community groups in progressing research into control tools and funding through Envirolink Grants.</p> <p>Staff agree that the Crown should contribute to pest management. The Proposed Plan has two Good Neighbour Rules, one for possums and one for feral goats, which is binding for the Crown. Council works closely with the Department of Conservation in a partnership approach for managing pests, including</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		adequately funded and controlled. We urge HBRC to seek more funding from non-rated and Crown occupiers to reflect their beneficiary and exacerbator status under the Plan			possums, Old Man's Beard, and the Cape to City and Poutiri Ao ō Tāne projects.
18.4	Federated Farmers of New Zealand	<p>AFFECTED PARTIES Owners/occupiers Federated Farmers supports owners/occupiers as being responsible for pest management. This has been the case up to now, and we expect this to continue.</p> <p>With the increase of large farming operations extending across multiple properties, perhaps the risk of spreading pests and weeds via farm machinery moving between these properties has increased. Individual responsibility to lessen the risk of spread is important.</p> <p>Crown agencies In our July 2017 submission on the discussion document, Federated Farmers asked that HBRC ensure that the central government agencies; DOC, the New Zealand Railways Corporation (Kiwi Rail), the New Zealand Transport Agency (NZTA) and Land Information New Zealand (LINZ) are identified as beneficiaries or exacerbators of pest management in the District. We are pleased to see that this has been done in Section 3.3.2.</p>	<p>Submission: 5. That Crown agencies; DOC, the New Zealand Railways Corporation (Kiwi Rail), the New Zealand Transport Agency (NZTA) and Land Information New Zealand (LINZ) are identified as beneficiaries or exacerbators of pest management in Section 3.3.2.</p>	Accept	As per section 3.3.2. Crown agencies have been identified as being significant beneficiaries or exacerbators of pest management in Hawke's Bay
18.5	Federated Farmers of New Zealand	We support the national direction that Crown, road and rail authorities carry out pest management on the land they occupy and that they are bound by the Good Neighbour Rule as stipulated by the	6. That Crown agencies are bound by the rules in the Regional Pest Management Plan.	Accept	Crown agencies are bound by the good neighbour rules in the Regional Pest Management Plan.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Biosecurity Law Reform Act 2012 and mentioned in Section 2.2.1 of the Regional Pest Management Plan. The Hawkes Bay Pest Management Plan lays pest management at the feet of individual landowners/occupiers in the first instance in Section 3.3.1, crown landowners should be no different.</p>			
18.6	Federated Farmers of New Zealand	<p>Support is given to HBRC's commitment in Section 3.3.2 that it will continue to pursue and maintain relationships with Crown agencies to achieve the objectives of the Regional Pest Management Plan. On Crown land, proactive pest control is seldom undertaken to the level required, and it is often only done when an obvious problem develops - by which stage it is generally more difficult to control the pest within the boundaries. This situation causes problems for farmers and other landowners who bear the costs of poor pest control on adjoining land when it spreads to their own property. We hope that this situation will be changing for the better.</p> <p>FFNZ views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and otherwise not required to directly contribute to pest management. While we acknowledge that, for example, DoC often does undertake significant pest management, we consider the good neighbour rule as applied in the Plan will provide a level of clarity and certainty that will ensure the objectives and policies are more likely to be achieved.</p>	<p>7. Support is given to HBRC's commitment in Section 3.3.2 that it will continue to pursue and maintain relationships with Crown agencies to achieve the objectives of the Regional Pest Management Plan.</p>	Accept	Please refer no. 18.3

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		In our view, both Kiwi Rail and the NZTA have an important role to play in pest management. The rail corridor has long been frustration for farmers, particularly areas that have not been operational for some time such as the Wairoa-Napier line.			
18.7	Federated Farmers of New Zealand	<p>Territorial Authorities</p> <p>Federated Farmers supports Section 3.3.3 which binds territorial authorities by the rules of the Regional Pest Management Plan.</p> <p>One aspect that has been concerning to us nationally is the increasing desire of councils to take esplanade reserves/strips for public access, and then not properly maintaining these. We are pleased that territorial authorities will be responsible for meeting the rules and costs of complying.</p>	8. That Territorial Authorities are bound by the rules in the Regional Pest Management Plan.	Accept	Territorial Authorities are bound by the rules in the Regional Pest Management Plan.
18.8	Federated Farmers of New Zealand	<p>Road Reserves</p> <p>Federated Farmers is pleased to see that the Council has decided that roading authorities are responsible for controlling pests on the road reserves they occupy in Section 3.3.4. We expect that this includes rest areas, weigh pits and stockpile sites.</p> <p>Roading contractors often spread pest plants when clearing slips or working on roadsides. They also transport seeds of noxious species with cultivation and harvesting machinery. This is a result of poor hygiene around quarries and river stockpiles, and inadequate cleaning of loaders, buckets and mowers. While of course acknowledging the</p>	9. That roading authorities are responsible for controlling pests on the road reserves they occupy in Section 3.3.4.	Accept	Roading authorities are bound by the rules in the Regional Pest Management Plan

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>natural processes of birds and wind, Federated Farmers believes activities contribute to the spread of pests. In our view, the monitoring of metal sources along with contractual obligations on sub-contractors to abide by good biosecurity practice, via a Code of Practice, are needed.</p> <p>Members have observed with disappointment weeds like Thorny Apple going to seed along roadsides, when they have been busy eradicating any they find on their own properties.</p> <p>We are also concerned that the use of glyphosate-based chemicals in current roadside-spraying programmes enables resistant weeds to relocate into neighbouring pasture and cropped land. Field Horsetail would be a good example of this. When burnt by glyphosate, the weed isn't killed and in fact comes back thicker.</p> <p>Federated Farmers asks that the Regional Pest Management Plan state specifically when the good neighbour rule is to be applied to any specified activity, specifically via words to the effect that "the Good Neighbour rule should be applied to any activity where one landholder's action or lack of action may impact adversely on the resources of a neighbour".</p>			
18.9	Federated Farmers of New Zealand	<p>GOOD NEIGHBOUR RULE</p> <p>We support the national direction that Crown, road and rail authorities carry out pest management on the land they occupy and that they are bound by the Good Neighbour Rule as stipulated by the Biosecurity Law Reform Act 2012 and mentioned in</p>	<p>Submission: 10. That the Good Neighbour Rule applies to all Boundary Control species.</p>		<p>Applying Good Neighbour Rules to all Boundary Control Species would require a rigorous Cost Benefit Analysis to be undertaken for each species. A sample of Boundary Control pest plants (gorse and nodding thistle) were tested for such a rule and failed the Cost Benefit test. The</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Section 2.2.1 of the Regional Pest Management Plan.</p> <p>We note that the RPMP's Good Neighbour Rules only specifically cover feral goats and possums as shown in Table 2 in Section 4.1, meaning that the majority of pests and weeds in the Plan are not covered by the Good Neighbour Rule.</p> <p>Many farmers within the region share a boundary with Crown land. These farmers should not have to labour under the boundary control rule only to see their Crown neighbours exempt from it.</p> <p>Federated Farmers considers that the Good Neighbour Rule should be extended to all pests and weeds that are currently in the Boundary Control status, being: Bathurst Burr; Blackberry; Gorse; Nodding Thistle; Ragwort; and Variegated Thistle. This means that not only are individual landowner/occupiers responsible for boundary control of these species, the Crown will be bound too.</p>		Reject	<p>Boundary Control Pest Plant programme has been retained within the Proposed Regional Pest Management Plan due to public support. Applying a Good Neighbour Rule to each Boundary Control pest plant will result in this Plan being inconsistent with the National Policy Direction. Councils approach is to work with the Department of Conservation on a case by case basis based on complaints and encourage them to be a good neighbour.</p>
18.10	Federated Farmers of New Zealand	<p>Plan Rule 11 proposes that possums will be subject to the Good Neighbour Rule and will need to be controlled to 4% RTC within 500m of a boundary of a neighbouring property where a possum control operation is in place.</p> <p>Federated Farmers supports the Crown being bound by this possum rule as this ensures equity between landowners/occupiers and the Crown.</p> <p>However we're not sure how this will be monitored and enforced as possums are highly mobile animals and can move in and out of this 500m mark.</p> <p>OSPRI factsheet RD12 on possum home ranges reveals that forest dwelling possums typically have</p>	<p>11. Federated Farmers asks how Plan Rule 11 will be monitored and enforced, given that possums are mobile and move in and out of 500m from a boundary.</p>	Note	<p>Although the Good Neighbour Rule only applies to a 500m strip, for adjacent land occupiers to achieve a possum density of 4% within this strip possum control will be required across a much larger area. This control will result in a reduction in possum migration out of non-controlled areas. Council will undertake monitoring within Good Neighbour Rule areas based on risk (habitat type, last known control etc), trend data and complaints.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		home ranges of 1–4 ha. Possums in more open habitats have larger ranges: 30 ha was measured in one lowland farmland site without forest remnants; and in upland dryland habitats home ranges cover between 5– 54 ha. The large home ranges in open habitats have often been attributed to possums having to cover more ground to find widely scattered resources, such as food or shelter.			Please note that staff are recommending changing the residual trap catch requirement to 5% for the Good Neighbour Rule as a result of submissions.
18.11	Federated Farmers of New Zealand	<p>YELLOW BRISTLE GRASS</p> <p>We are pleased that Yellow bristle grass (YBG) has been given an exclusion status.</p> <p>YBG is a serious concern to our farming peers in Taranaki, and we are keen to prevent its establishment in Hawke’s Bay. An aggressive plant, it can quickly become dominant in a paddock. Cows do not find yellow bristle grass very palatable and therefore avoid eating it. This leads to both a serious loss in farm productivity and rapid reinfestation from stock avoidance. Stock health issues are also of concern as the seed heads can cause lesions and ulcers to the mouths of grazing cattle. Where yellow bristle grass has become established, annual feed production is reduced by up to 20%, with associated costs for replacement supplementary feed or pasture renovation.</p> <p>While Taranaki farmers are making an effort to control YBG on their properties, the main issue is the way it is spreading along road verges. This problem was tackled by a co-ordinate spraying regime on the roadsides, but unfortunately, sprays were being applied incorrectly and YBG continued to move rapidly along road corridors.</p>	12. Yellow Bristle Grass is given exclusion status.	Accept in part	<p>Staff agree that yellow bristle grass is a serious agricultural weed.</p> <p>Please note that staff are recommending that yellow bristle grass is moved from Eradication to Sustained Control due a large established population being discovered along the roadsides in northern Hawke’s Bay.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		One of the challenges controlling YBG in Taranaki was that it was much harder for hill country farms to spray out and re-grass in an attempt to control YBG than it was in flatter terrain. Exclusion for Hawkes Bay is the best option.			
18.12	Federated Farmers of New Zealand	<p>POSSUMS – PCA PROGRAMME</p> <p>Federated Farmers appreciates the focus HBRC has taken to possum control, and in our view, believe it is critical that possum control still remains a primary focus, given the risk bovine TB poses to cattle, deer and human health. Over the last twenty years, rural ratepayers have contributed millions of dollars to district wide possum control delivering both farm production and biodiversity benefits, which our members are keen to retain. Federated Farmers believes the current approach to possum control is working, i.e. land owners having two options to maintain low numbers, either via a possum contractor or undertaking their own pest control. Members have a lot of praise for the PCA.</p>	13. Federated Farmers continues to support the Possum Control Area Programme.	Note	Staff acknowledge and thank Federated Farmers for its continued support for this programme since its inception 18 years ago. This support has played a key role in the success of the programme.
18.13	Federated Farmers of New Zealand	We are disappointed to see that Figure 9 on page 61 shows DoC estate exempt from the Possum Control Areas, and therefore exempt from Plan Rule 11. DoC should play its part in the fight against possums. The Department is quick enough to advocate for more biodiversity rules in District and Regional Plans imposed on private landowners, it would be nice to see DoC carry out more actions on	14. That DoC estate is bound by Plan Rule 11.	Reject	Although DOC estate is exempt from Plan Rule 11, they are bound by the Good Neighbour Rule. Under the National Policy Direction, Crown agencies can only be bound by Good Neighbour Rules. We are unable to bind DOC estate to Plan Rule 11.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		their own property which improves biodiversity goals.			
18.14	Federated Farmers of New Zealand	<p>Members have also raised concerns about the nature at which the PCA programme has been rolled out, in particular compulsory sign up to the programme without adequate consultation. We understand this has been in particular a problem for members on large land blocks previously considered OSPRI possum control areas. Federated Farmers is keen to work with HBRC to investigate this issue further, to ensure that any future changes impacting our members are managed appropriately.</p> <p>We reiterate our question as to how Plan Rule 11 will be monitored and enforced.</p>	15. Federated Farmers asks how Plan Rule 11 will be monitored and enforced, given that possums are mobile and move in and out of 500m from a boundary.	Note	Please refer no. 18.10
18.15	Federated Farmers of New Zealand	<p>CHILEAN NEEDLE GRASS</p> <p>Federated Farmers is disappointed that Chilean Needle Grass has been downgraded from total control in the 2013 Strategy to sustained control in the 2018 Pest Management Plan, however we recognise that this reflects the reality of the weed in the Region.</p> <p>Federated Farmers consider this pest poses a significant threat to the sustainability of farming in the Hawke's Bay Region. We note that it is currently managed in the Plan via occupier responsibility, under Rules 6 and 7 (pages 55 and 56.)</p> <p>The historical control methods, such as spot spraying and spraying boundaries, are labour</p>	16. That Chilean Needle Grass has progressive containment status, with intensified efforts to ensure it remains on the current infested properties and does not spread further.	Reject	<p>The current aim of the proposed Chilean needle grass programme is to sustainably control Chilean needle grass within the Hawke's Bay region to ensure:</p> <p>(i) that current infestations levels do not increase; and</p> <p>(ii) spread to other properties is prevented.</p> <p>Staff do not believe that Chilean needle grass would meet Progressive Containment requirements at this point due to its current distribution, the difficulty in identifying the pest (can go undetected on a property for many years) and limited control tools.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>intensive and expensive. The control in the past has limited success, and it is far from eradication and is not even achieving containment. CNG is still spreading. A substantial study commenced in 2002 in the Hawkes Bay on CNG and later programmes were launched in Marlborough and Canterbury. Part of the national approach would ensure everyone shares their collective knowledge and we progress forward together. Information and awareness programmes have added to the tools to fight CNG. Substantial awareness programmes have been launched within Marlborough District Council and Environment Canterbury to inform farmers in those areas without CNG of the risks posed by the pest weed and to help them with early identification and their own biosecurity measures needed to ensure it doesn't enter their properties. In 2011 the herbicide Taskforce was registered for use in New Zealand for NT and CNG. Taskforce, washed into the soil after at least 5mm of rain, is taken up by the roots to kill the plant but also has a residual effect against germinating seeds for between 1-3 years. This result helps control the CNG as the seed bank germinates. This has been an exciting break through for affected NZ sheep and beef farmers. AgResearch has established that CNG, and many grasses were most susceptible to Taskforce while plantain, chicory, lucerne, cocksfoot and some clovers were the most resilient. In cultivatable land, combined herbicides including Taskforce, followed by drilling with cocksfoot, lucerne, clovers, and plantain have resulted in productive pastures, a substantial reduction in CNG though at a significant cost.</p>			<p>Sustained Control has been identified the most appropriate programme taking into account the following:</p> <p>(a) nature of the distribution of infestations, (b) control tools available, and whether the distribution of the species can be reduced.</p> <p>Listing the Chilean needle grass programme under Progressive Containment would be inconsistent with the National Policy Direction. This programme can however be reassessed in the future and moved to Progressive Containment if, for example, new tools were to become available in controlling this pest.</p> <p>Council has just increased its resources for this programme through the current Long-Term Plan process, adding another .4 FTE to increase surveillance and response during the flowering and seeding period. Increased restrictions are also included in this Plan in regards to making hay/silage. Please refer to Plan Rule 7 (pg 56) in the Proposed Plan.</p> <p>Also, please note:</p> <p>1) Awareness programme The Chilean Needle Grass Awareness Programme is a joint programme between the Hawke's Bay Regional Council,</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Some infestations of CNG are in vineyards and on steep un-cultivable land. Taskforce can't be used in vineyards. On steep land Taskforce use requires over sowing of the resilient species to establish pasture post treatment and management strategies to ensure CNG is out competed. This is a promising solution but is still being trialled. Other tools in the arsenal against CNG include the importation of a bio control agent in the form of a rust from South America. Sniffer dogs have also been successfully trained to identify CNG both in its vegetative or seeding state.</p> <p>We support HBRC's concerns that the current programme places a significant degree of onus on the landowner to identify the pest and alert HBRC biosecurity staff. We are committed to working with HBRC to manage the pest, and therefore support investigating further initiatives to support the current management programme.</p> <p>Federated Farmers knows that Marlborough District Council has introduced a rule similar to Hawkes Bay Rule 7, Marlborough Rule 7.8.2.4 which restricts hay/silage movement off an infested property, unless it originates from an uninfested area with the agreement of the Council. Marlborough backs it up with another rule about machinery not being moved off an infested property unless its been cleaned or has only operated in uninfested areas, and domestic animals shall also not be moved when they carry seeds or plant parts.</p> <p>Finally, we note that HBRC have proposed to increase the CNG surveillance programme during panicle flowering (November to December).</p>			<p>Marlborough District Council, Canterbury Regional Council and Ministry of Primary Industries with representation from Federated Farmers. Campaigns are run in conjunction with Canterbury Regional Council and Marlborough District Council to raise awareness of CNG across Hawke's Bay. Examples of the HBRC Awareness programme in action are:</p> <ul style="list-style-type: none"> • Stands at A and P Shows • Regular articles in the media and Facebook posts • Stall at National Field days • Display at Horse of the Year • Display at Stortford Lodge Stockyard • Farmer meetings <p>2) Taskforce Taskforce herbicide is used where appropriate in Hawke's Bay and is an important tool in controlling Chilean needle grass. HBRC provides Taskforce herbicide for the control of Chilean needle grass free of charge to Hawke's Bay ratepayers as part of the HBRC Subsidy Scheme.</p> <p>3) Machinery cleaning/inspections Hawke's Bay Regional Council also backs up the rule restricting the movement of hay/silage from CNG infested properties with a rule stating that 'no person should move any goods contaminated with CNG seed beyond their property boundary' – this includes machinery. HBRC staff regularly</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Federated Farmers supports this proposal, and agrees that this would allow for quicker detection of new populations and a more rigorous compliance monitoring programme. We submit that the resources previously directed to the Privet campaign, could be re-directed to initiatives like this which are likely to provide a greater benefit. Federated Farmers supports progressive containment status, with intensified efforts to ensure it remains on the current infested properties and does not spread further.</p>			<p>inspect machinery that has been operating on CNG infested properties to ensure they are cleaned to an appropriate standard before leaving the property.</p>
18.16	Federated Farmers of New Zealand	<p>We have noticed that the educational material on identifying Chilean Needle Grass needs to be better. The HBRC Factsheet has no photos of the grass at all, nor does the HBRC webpage. The photos on the AgPest webpage are of limited use for farmers trying to identify the grass, they either show a zoomed out picture of a paddock or extreme close-ups of the seedhead. The HBRC webpage links to a video on how to identify the grass, but for farmers with poor internet connections this is unlikely to run well on their computers. Good quality photos of the tuft of grass as well as photos of components of the grass are needed, on a handy single sheet of paper that can be taken out onto the farm. Tips on the likely habitat would be useful too, so farmers can concentrate looking in the right places.</p>	<p>17. That educational material is improved by showing good quality photos of the grass on a single sheet of paper that the farmer can keep in their ute</p>	<p>Note</p>	<p>The Chilean Needle Grass awareness programme developed a ute guide designed as a resource for land occupiers which can be kept in a vehicle. The ute guide can be found here: https://www.hbrc.govt.nz/assets/Document-Library/Fact-Sheets/CNG-ute-guide.pdf</p> <p>The Chilean Needle Grass ‘Frequently Asked Questions’ factsheet was developed as an addition to the CNG HBRC webpage (https://www.hbrc.govt.nz/services/pest-control/plant-pests/chilean-needle-grass/) and is not meant to be a standalone document. The link to the fact sheet can be found at the bottom of the webpage (link above).</p> <p>The HBRC CNG webpage does have a photo of CNG and a link to the ute guide which is full of excellent CNG photos.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>The photos on the AgPest website are useful as the seed is a distinguishable feature of the plant.</p> <p>The video on the HBRC website is another option for people to download it. The 'Habitat' section in the ute guide (which can be accessed through our website) notes where CNG is likely to be found.</p>
18.17	Federated Farmers of New Zealand	<p>PREDATORS – FERRET, STOAT, WEASEL AND CATS</p> <p>The Plan notes that landowners have been requesting wider predator control programme similar to the Possum Control Areas. Federated Farmers applauds these keen landowners. Federated Farmers is pleased to see that a predator control programme will operate on a voluntary basis, with Council seeking agreement from individual landowners with a trigger point of seeking 75% of the total Predator Control Area land area in agreement. Seeking individual agreements allows the Council to have direct contact with these landowners and get to know them and their unique pest issues.</p>	18. That the proposed Predator Control Programmes are voluntary.	Accept	As outlined in the Hawke's Bay Regional Predator Control Area Technical Protocol (PN 4970), agreement will be sought from individual landowners with an agreement level of 75%, before predator control becomes binding for the entire Predator Control Area.
18.18	Federated Farmers of New Zealand	We hope the Council's subsidy on pest control products remains to assist these landowners, as this is an excellent initiative.	19. That the Council's subsidy on pest control products remains.	Note	Although outside the remit of the Plan, Council's intention is to keep the current pest plant and pest animal subsidy scheme and notes this support.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
18.19	Federated Farmers of New Zealand	We suggest that some of the Council factsheets are updated, as the Possum Control Area factsheet is from 2004.	20. That some of the factsheets are updated to ensure they contain relevant information.	Note	Staff are aware that some of its fact sheets are out of date. Once the Plan has been ratified, these fact sheets will be updated and modified to reflect any changes made to the plan.
19.1	KiwiRail	<p>3.3.1 Responsibilities of Owners and/or Occupiers - Support</p> <p>KiwiRail note the discussion that owners and occupiers cannot stop an authorised person from entering a site address biosecurity and pest matters.</p> <p>KiwiRail wish to ensure the Regional Council is aware that the rail land is not publicly accessible for health and safety reasons. KiwiRail operate access to the rail corridor via a permit to enter system, which is required to be obtained prior to access for inspection / pest management activities being undertaken. These can be obtained from here: http://www.kiwirail.co.nz/infrastructure/accessing-the-corridor.html</p>	Retain as notified.	Accept	Staff are aware of the KiwiRail permit system.
19.2	KiwiRail	<p>3.3.2 Crown Agencies - Support</p> <p>The discussion around Crown Agencies, and noting in particular the nuance around State Owned Enterprises being bound by any rule under the Proposed Plan, and that this applies to KiwiRail is supported for clarity.</p>	Retain as notified.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		KiwiRail also specifically support the discussion that Council will work with the agencies to pursue formal and informal relationships with them to achieve the objectives of the Proposed Plan.			
19.3	KiwiRail	<p>3.3.4 Road Reserves - Support</p> <p>The discussion on road reserves proposes that the roading agencies are responsible for pest management in the road corridors. One of the areas listed where roading authorities are responsible for controlling pests includes 'road reserves adjacent to land where the landowner is undertaking programmed pest management'.</p> <p>There is no specific similar provision in relation to the rail corridor, however KiwiRail would support that either 3.3.4 is amended to reflect and provide clarity that KiwiRail is responsible for pest management within the rail corridor, and that as with roads the area adjacent to land that is being actively managed is to be subject to pest management. In effect requiring KiwiRail to be a good neighbour.</p> <p>There area areas of the rail corridor that are fenced off by adjoining landowners and either legally or illegally occupied, and pest management of these areas should fall to those landowners, consistent with the similar situation in relation to roads.</p>	Consider amendment to include rail corridor as appropriate.	Accept	Staff recommend amending section 3.3.4. to additionally apply to railway corridors.
19.4	KiwiRail	5.3 Principal Measures to Manage Pests - Support	Retain as notified.		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>1(b) under 5.3 identifies that Written Management Agreements are able to be entered into between the landowner and the Council, and that these will set out what is intended to be undertaken to meet the Proposed Plan.</p> <p>Further the discussion notes that where the landowner is complying with the agreement, no written directions will be received.</p> <p>In the event no change is identified to 3.3.4 to explicitly address rail corridor as well as road reserves, KiwiRail anticipate relying on a Written Management Agreement process. KiwiRail is keen to work with the Council to develop pest management responses that are practical and capable of being undertaken within operational/financial parameters. KiwiRail therefore support the ability to prepare such an agreement. KiwiRail note above that the rail corridor is a unique environment that poses challenges for active pest management, however such an agreement process will give KiwiRail the opportunity to actively manage certain areas at any given time and review the agreement over time to ensure that the corridor is progressively managed in accordance with the Proposed Plan objectives.</p> <p>3(d) notes that Council can perform a service delivery type function, including in relation to the use of control tools and biological agents. Biological control agents have been used by KiwiRail within the rail corridor as a means of controlling pests, and KiwiRail are willing to work with the Council to further the use of such controls in the region.</p>		Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
19.5	KiwiRail	<p>Objective 2 - Support</p> <p>Some of the specific species identified for eradication are known to be located in or near the rail corridor, such as Goat's rue. The Proposed Plan notes that management of pests identified for eradication will be undertaken by the Council. KiwiRail support this and will facilitate access where possible to achieve this, noting the permit to enter process identified above will be required to be followed.</p>	Retain as notified.	Accept	
19.6	KiwiRail	<p>Rule 5 - Support</p> <p>Species identified as appropriate for progressive containment that are likely to be in the rail corridor include Australian Sedge, Cotton Thistle, Japanese Honeysuckle, and Old Mans Beard. Objective 5 sets out a range of options to achieve progressive containment of the listed species.</p> <p>Rule 5 sets out that, except where there is an approved Written Management Agreement, the occupier of land is required to destroy the listed species. KiwiRail specifically support the exception proposed in the rule as this enables those parties such as KiwiRail to prepare such an agreement to cover the entire corridor within the region and to focus pest management control activities in accordance with that.</p>	Retain as notified.	Accept	
19.7	KiwiRail	Rule 6 - Support	Retain as notified.		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		As with Rule 5, Rule 6 sets out the requirement to destroy Chilean Needle Grass except where the occupier has an approved Written Management Agreement in place. KiwiRail support this approach.		Accept	
20.1	Garth Eyles	<p>Section 6.2, page 35</p> <p>There are three plants which I believe should be included in the Eradication section:</p> <p>Hydrilla. I presume this is omitted because its being dealt with by a Government Department. However, I believe it should be in this list as this is a pest in the Hawke's Bay region where eradication is possible. If it is not to be included in the plan there should be an explanation as to why it is not. If I have missed it my apologies.</p>	Include hydrilla in eradication section	Reject	Hydrilla is a listed as a National Interest Pest Response (NIPR) pest plant managed by the Ministry for Primary Industries. MPI's aim is to eradicate hydrilla from New Zealand. Adding hydrilla to this Plan will not add any value to its Biosecurity status nor the current eradication programme.
20.2	Garth Eyles	<p>Woolly nightshade. This plant is listed in table 6 as a plant under Progressive Containment program's. Woolly Nightshade has been under a total control programme since at least 1992. The location of every plant in Hawke's Bay that has been removed has been recorded and presumably is checked annually. There used to be annual publicity in the local papers at flowering time to ensure that the public was aware of it, I have not seen any of this type of information for a number of years.</p> <p>After 16 years of intensive control I believe it is at the stage where eradication is eminently feasible and should be aimed for. Progressive containment to me as an excuse for taking the pressure off.</p>	Include woolly nightshade in eradication section	Reject	Council's long-term goal for woolly nightshade is eradication. However, eradication in the short to medium-term is not achievable due to its current location (urban properties), distribution and mode of dispersal. Listing woolly nightshade as an Eradication programme would be inconsistent with the National Policy Direction. Woolly nightshade is listed as Progressive Containment where all individual plants are required to be controlled. Council is not reducing its efforts on controlling woolly nightshade. Progressive Containment is an interim step towards eradication.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Taking the pressure off means there is little effort put in to the eradication program and it will become more common.</p> <p>How does Council plan to carry out this programme when individual plants are rare and widely dispersed?</p> <p>This region is at the southern range of Woolly nightshade. It is gratifying to see the effects of the control program over the last 16 years as compared with the results of the very ineffectual programs in the Bay of Plenty, Waikato and especially Auckland. The drive from the Auckland Airport to the city center is a continual reminder of how poor management results in continuing infestations. Don't let's drop the ball on this one - go for the jugular and eradicate it.</p>			Please note woolly nightshade is present in Nelson, Wellington and Horizons regions.
20.3	Garth Eyles	<p>Velvetleaf. Velvetleaf is another plant listed in table 6 page 44 under Progressive Containment. Taking into account the huge effort that has been put in in other regions of New Zealand to eradicate this plant it seems a very weak approach that this council has taken to only classify it under Progressive Containment. Surely the objective is to eradicate it. Every effort must be made to get rid of this plant completely.</p>	Include velvetleaf in eradication section	Reject	<p>Although there are only two known populations of velvetleaf in the Hawke's Bay region, due to the current national distribution of velvetleaf, multiple vector pathways and the longevity of its seeds (viable for up to 50 years), eradication is unlikely in the short to medium term. Successful eradication of velvetleaf will be governed by the Ministry of Primary Industries and other Regional Council responses nationally. Although MPI is the lead agency for velvetleaf, the species has been included in the Plan to equip the Council with the required powers under the Biosecurity Act 1993 to respond immediately</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					in the event of new velvetleaf areas being discovered in the Hawke's Bay region.
20.4	Garth Eyles	<p>Section 6.3.7 48. Old Man's Beard. Some background for this classification may be of interest. In the first management plan Council set out to begin a long-term program of eradicating all Old Man's Beard from the region. It was accepted that it was both a long-term project and that Council didn't have the capability of achieving it in the short term. The program decided upon was to break the region into three parts; northern, middle and southern. In the first plan Council would concentrate on the northern part - the Wairoa area - with the objective of seeing whether it was feasible to get rid it with the in-house capabilities that Council had at that time. I understand the program has been moderately successful, there is still considerable amounts up the Lake Waikaremoana road but in other areas the amount has been significantly reduced. This is especially so in urban areas.</p> <p>In the second plan this policy was not continued, instead, I believe because of the amount of old man's beard in the rivers and the very significant amount of work required to control, it was decided not to continue with the programme. Counsellors are now left with a historic area of control. I presume this is better than nothing but I have always been disappointed in the lack of vision that Council had and has in this area. Council seems to give up on long term control of plants in contrast to those with animals.</p>	No relief stated	Note	Over half of Hawke's Bay (north of State Highway 5) is currently included in the Old Man's Beard Progressive Containment programme. It is important that resources are focussed in this area for the programme to be successful. There are significant infestations of Old Man's Beard south of State Highway 5, including orchards, shelterbelts, urban areas and steep gorges in rural areas. A significant investment would be required long-term to fund such a programme. Adding the entire region to the Plan could also result in a significant negative response from the community as land occupiers would be responsible for its control.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
20.5	Garth Eyles	<p>Section 6.4.2. Privet.</p> <p>The original reason for including privet in the plan was to reduce the impact the pollen had on people's health. People I knew were confined to wheelchairs during the privet season and on a more personal note my wife, when she got within 100 m of a privet tree, developed a runny nose and very bad hay fever. My wife took the opportunity provided by Council to be tested for the privet allergy and she came out with a low susceptibility. I therefore have very little faith in the effectiveness of the test.</p> <p>Very few people, if any, will get a Doctor's certificate or a positive blood test clearly showing a person to be suffering a privet allergy. If they do I presume only the privet on their section will be required to be removed or will all the privet in the adjacent sections be required to be removed? It is a very good excuse for dropping a long term programme without appearing to do so! Council is abandoning the 16 years of work that was undertaken to reduce the number of privet trees in urban areas throughout the region. In recent years underfunding has meant increasing waiting lists for contractors to remove the plants. Without appropriate funding the project will never be successful and underfunding in recent years has ensured it has not been successful. With this new classification Council should go public and tell people they only imagine that they have a reaction when they get close to a privet tree because the</p>	No relief stated	Note	<p>A privet programme has been included in the Plan (6.4.2 pg. 56) with the objective of minimising adverse effects of privet on human health brought to Council's attention. Given the large number of species than can trigger an allergenic response, such as silver birch, olive, plantain and grasses, large-scale removal of privet in isolation is unlikely to have a significant impact regionally for allergy sufferers. Council has chosen to take a targeted approach for the privet programme.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>medical allergy tests say so and based on this Council is abandoning 16 years of work. I'm really disappointed that Council has taken this way of getting out of a project which has cost a significant amount of money to reduce privet plant numbers in the urban areas. Controlling plants is much more difficult than controlling animal populations for the simple reason plants drop seeds which can lay dormant for many years. Once initial control is achieved, long term monitoring is required to remove successive generations before they seed. Long term commitment is required and this commitment seems to be lacking.</p>			
20.6	Garth Eyles	<p>Section 6.5.2 feral deer. Feral deer are a far bigger risk to the biodiversity in Hawke's Bay than Council obviously thinks.</p> <p>The biological health of the mountain ranges to the west of Hawke's Bay is essential for the well being of our rivers. Intensive deer control was undertaken for many years to reverse the trend of sub- canopy and ground cover destruction leading to bare ground and the consequent long term instability of the areas. The faulted, shattered and ash mantled underlying greywacke, when exposed to the elements, resulted in massive amounts of erosion with the gravel streaming down the river's. Since the Regional Council was formed in the early 1990s there has been no effort made to look after the health of these very sensitive mountains. The consideration has been that it is the Department of</p>	<p>I would recommend that the feral deer should be moved up the list from the very weak status you've given it. Personally, I'd like to see them classified under eradication.</p>	Reject	<p>The Plan acknowledges that deer selectively browse native vegetation and as a result can change forest structure and composition of understory. Feral deer are currently declared a pest in site-led areas, with the aim of supporting the community in undertaking feral deer control at sites of ecological importance.</p> <p>The Ecosystem Prioritisation process undertaken outside of the RPMP process has highlighted key areas for Council to focus its efforts with funding attached to this. This funding includes some resourcing for fencing.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Conservation's responsibility and so Council left it to them. In recent years the underfunding of the Department of Conservation has led to decreasing emphasis being given to animal pest control in the ranges (except for possums). As a consequence, farmers are now talking of herds of 30 to 40 deer ranging farmland areas. The QE2 Trust is now advocating that members put deer proof fences around their bush covenants to protect them from predation by feral deer. The national emphasis on managing the deer herd for trophies, as promoted by Peter Dunne, will have a very detrimental long-term effect on the stability of our mountain lands in Hawke's Bay. It's a waste of time talking biodiversity protection and enhancement if we don't put a lot of effort into controlling and exterminating the deer herds. Deer and biodiversity enhancement don't go together.</p>			Staff do not believe eradication of feral deer is currently feasible in the Hawke's Bay region.
20.7	Garth Eyles	<p>Monitoring</p> <p>To a large part, once numbers are sown to acceptable limits, the success of control programmes is dependant on monitoring. My question is how is Council monitoring the extent and spread of these plants?</p> <p>Conclusion</p> <p>Thank you for taking the time to listen to these comments. I appreciate that with all the work that you put in to do this plan it is unlikely any changes will be made but at least I've had my say.</p>	How is Council monitoring the extent and spread of these plants?	Note	Section 7 of the Plan (Monitoring) outlines how the Council will measure the objectives of the Plan. These measures will be included in the Biosecurity Annual Operating Plan which is presented to Councillors annually at Council meetings. Data is collected through data sheet entry, GPS coordinates and reports, and is stored in databases such as Clover, Biovault, Excel and Herbi. Biosecurity is included in phase two of the roll out of Integrated Regional Information System (IRIS), which will allow complete data capture on one device in the field which automatically uploads to a database. Data

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					capture will be structured to align with Section 7 of this Plan.
21.1	Forest & Bird (head office)	<p>5. As proposed, the Regional Pest Management Plan (RPMP) does not include any reference to the Department of Conservation’s Conservation Management Strategy (CMS) for the region. Forest and Bird consider the RPMP should note and explain the relationship between the Strategy and the CMS. The legislative basis for this inclusion is Section 66 (2) (c) (i) of the Resource Management Act, which states:</p> <p>“Matters to be considered by regional council (plans)...</p> <p>(2) In addition to the requirements of section 67(3) and (4), when preparing or changing any regional plan, the regional council shall have regard to—</p> <p>(c) Any—</p> <p>(i) Management plans and strategies prepared under other Acts;”</p> <p>6. This places a responsibility on Hawkes Bay Regional Council to have regard for the outcomes, policies and objectives within the CMS when reviewing the RPMP.</p> <p>7. The importance of the CMS in planning processes has recently been reiterated in case law that emerged from the Ruataniwha Supreme Court decision.</p>	RPMP should note and explain the relationship between the Strategy and the CMS	Note	<p>The Proposed Plan discusses the relationship between this Plan and the Conservation Act 1987. The Biosecurity Act does not prescribe that the requirements of the RMA need to be followed. The only requirement is not to contradict the RMA.</p> <p>Please note this plan has been prepared under the Biosecurity Act 1993, not the RMA.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
21.2	Forest & Bird (head office)	<p>Predator Free 2050</p> <p>8. Forest & Bird supports the reference to Predator Free 2050 and the associated objectives and interim goals.</p>	Support the reference to Predator Free 2050 and the associated objectives and interim goals	Note	
21.3	Forest & Bird (head office)	<p>Landowner Responsibility</p> <p>9. Forest & Bird is largely supportive of RPMP section 3.3.1, which states that pest management is the responsibility of the occupier, and outlines council's ability to take legal action if pests are not managed appropriately. Council should not shy away from a regulatory or compulsory action approach in controlling pest species. Voluntary approaches are beneficial but limited in that they often result in ad hoc and inconsistent results.</p> <p>10. Similarly, Council should not be reluctant to charge landowners with the costs of pest control on land for which they (the landowners) are responsible. Charging for pest control simply internalises the costs of landowners' activities, which would otherwise be borne by the environment or other landowners, which is unjust and unfair.</p>	Is largely supportive of RPMP section 3.3.1	Note	
21.4	Forest & Bird (head office)	Road and Rail Reserves	13. Forest & Bird supports Council's position in section 3.3.4 that roading		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>11. Road and rail verges are primary conduits for the spread of pest plants as they are more commonly disturbed (by road and rail works), which introduces seed and creates conditions suitable for the establishment of weeds. Roding metal and rail ballast are obtained from many different sources and are often contaminated with seeds.</p> <p>12. Road and rail verges also provide open corridors through which pest animals can move efficiently—and therefore spread—across long distances.</p>	authorities should be responsible for controlling pests in the road corridor.	Accept	
21.5	Forest & Bird (head office)	14. It is unclear how rail corridors will be managed in the RPMP. We suggest Council adopt the same approach to rail verges as proposed for roads (if this is not already the intention), whereby the rail authority would be responsible for pest management through the rail corridor, and make this clear in the plan	Council adopt the same approach to rail verges as proposed for roads	Accept	Staff recommend amending section 3.3.4. to additionally apply to railway corridors.
21.6	Forest & Bird (head office)	15. HBRC should encourage the roding industry to develop a code of environmental ethics to address the spread of weeds in gravel. We believe this should be extended to include all agricultural and roding machinery contractors and operators.	Encourage the roding industry to develop a code of environmental ethics to address the spread of weeds in gravel.	Note	Council audits movement of earth moving machinery for most of our listed pest plants, where contractors are required to complete a Biosecurity check before being allowed to move machinery. Restrictions are also placed on mowing equipment for certain pest plants to prevent the movement of seeds e.g. along the road corridor. This targeted approach allows Council to focus its resources on the listed high threat pest plants.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
21.8	Forest & Bird (head office)	16. Weeds are also commonly spread from weed infested gravel. Gravel pits need to be controlled for all weed species and regular monitoring of all gravel pits should be conducted.	Gravel pits need to be controlled for all weed species and regular monitoring of all gravel pits should be conducted	Reject	The resources required to monitor all gravel pits and require control of all weeds would be significant and unlikely to pass a cost benefit analysis. Please refer to No. 21.6 for Councils current approach.
21.9	Forest & Bird (head office)	<p>Good Neighbour Rules</p> <p>17. Forest & Bird consider it a significant failure that good neighbour rules appear to apply only to possums and goats in the proposed plan. Such poor coverage of pest species is a severe shortcoming and will be detrimental to the management of pests in Hawkes Bay. The recently adopted Gisborne District Council Regional Pest Management Plan applies a good neighbour rule to almost all listed species in the plan that present a risk in terms of their ability to disperse, including animal and plant species. Forest & Bird suggest HBRC review the Gisborne Plan and align their good neighbour rules with those in the Gisborne Plan.</p>	Forest & Bird suggest HBRC review the Gisborne Plan and align their good neighbour rules with those in the Gisborne Plan.	Reject	<p>Staff are aware of Gisborne District Councils Regional Pest Management Plan and Good Neighbour Rules contained within it. On the basis of the work carried out and endorsed by Regional Councils collectively we believe that a blanket application to all pests is unlikely to meet the requirements of the National Policy Direction.</p> <p>Moreover, the majority of pest plants contained within the Proposed Hawke's Bay Regional Council Regional Pest Management Plan require total control of the pest, making a Good Neighbour Rule unnecessary except for binding the crown. Council is currently working with crown agencies in a partnership in controlling many of these pest plants.</p>
21.10	Forest & Bird (head office)	<p>Pest Plants</p> <p>18. Forest & Bird supports the existing list of pest plants and consider Council should add the following species to the pest plant list (or organism</p>	Council should add the following species to the pest plant list (or organism of interest list		Council does not currently have the resources to manage this number of pest plants. Significant resources would be required to manage each of these pests

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>of interest list where appropriate, i.e. if a species is yet to be found in the region). It is particularly important to consider those species that are currently a problem in nearby regions and may spread to Hawkes Bay, existing species that could increase their spread within Hawkes Bay, and those species that may spread from Hawkes Bay into other regions, particularly with changes in climate.</p> <ul style="list-style-type: none"> • Agapanthus • Barberry • Bladderwort • Blue morning glory • Boxthorn • Buddleia • Burdock • California stink weed • Cape tulip • Chilean rhubarb • Chinese mugwort • Egeria • Eleagnus • Fan palm (Livistonia & Washingtonia) • Giant reed • Hawthron • Himalayan honeysuckle • Holly leaved senecio • Horse nettle • Lagarosiphon • Madeira/mignonette vine • Mexican daisy • Mexican water lily • Monkey comb vine • Pampas (common and purple) 	<p>where appropriate, i.e. if a species is yet to be found in the region).</p> <ul style="list-style-type: none"> • Agapanthus • Barberry • Bladderwort • Blue morning glory • Boxthorn • Buddleia • Burdock • California stink weed • Cape tulip • Chilean rhubarb • Chinese mugwort • Egeria • Eleagnus • Fan palm (Livistonia & Washingtonia) • Giant reed • Hawthron • Himalayan honeysuckle • Holly leaved senecio • Horse nettle • Lagarosiphon • Madeira/mignonette vine • Mexican daisy • Mexican water lily • Monkey comb vine • Pampas (common and purple) • Pennisetum/white foxtail 	<p>Reject</p>	<p>within a programme. Staff believe It is important Council focusses its resources on key programmes in order to deliver stated objectives.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<ul style="list-style-type: none"> • Pennisetum/white foxtail • Periwinkle • Red cestrum • Russell lupin • Salvinia • Smilax • Sweet briar • Star thistle • Thorn apple • Undaria • Water hyacinth • Wild ginger • Wilding pines (should be moved from the 'Organism of Interest' (Ool) list to the pest plant list) • Yucca (species) 	<ul style="list-style-type: none"> • Periwinkle • Red cestrum • Russell lupin • Salvinia • Smilax • Sweet briar • Star thistle • Thorn apple • Undaria • Water hyacinth • Wild ginger • Wilding pines (should be moved from the 'Organism of Interest' (Ool) list to the pest plant list) • Yucca (species) 		
21.11	Forest & Bird (head office)	<p>19. Forest & Bird views with a great deal of concern the increasing wilding pine infestation within highly vulnerable ecosystems within the Hawkes Bay region, such as that of the Kaweka Ranges. Forestry companies should provide funding for the control of Wilding Conifers and make an effort to control them themselves. We note the real impact that working collaboratively elsewhere in the country has had on reducing the wilding spread trees, e.g. Craigeburn Basin.</p>	No relief stated	Note	<p><i>Pinus contorta</i> is declared a pest in this Plan under Progressive Containment. Council has been working closely with the forestry sector in controlling <i>Pinus contorta</i>.</p> <p>Council is also working in partnership with MPI, DOC and Regional Councils in implementing the NZ Wilding Conifer Management Plan.</p> <p>The National Environmental Standard for Plantation Forestry came into effect May 2018 which now requires land occupiers to assess the risk of wilding conifers through the use of a wilding conifer calculator.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
21.12	Forest & Bird (head office)	20. Pampas is becoming a major weed in and around some significant wetlands and sand dunes together with wildling pines. Good examples are the large wetlands near Wairoa (Whakaki Lake, Maungawhio Lagoon etc.) and Porangahau Estuary.	No relief stated	Note	Staff recommend pampas be added to the Plan as an Organism of Interest.
21.13	Forest & Bird (head office)	<p>Animal Pests</p> <p>21. Forest and Bird is concerned by the effects of all animal pests. To address this Forest and Bird advocates the following policies:</p> <ul style="list-style-type: none"> •Prohibition of the farming of mustelids and wallaby. •Creation of buffer zones around parks and reserves where certain invasive species cannot be farmed. Goats, deer and emu should not be farmed within 5 km of a reserve managed for conservation purposes. •Prohibition of the farming of known animal pests outside their feral range. •Control programmes for feral populations of goats, deer, pigs, and other animals as appropriate. •Prohibition of the grazing of domestic stock in: Native forest and shrublands where they prevent regeneration and risk contraction of Bovine TB; and the beds and riparian margins of lakes, rivers, streams and wetlands. Such grazing results in the contamination of waterways, destroys valuable riparian vegetation protecting in-stream values, and accelerates the spread of weeds. 	<p>Prohibition of the farming of mustelids and wallaby.</p> <ul style="list-style-type: none"> •Creation of buffer zones around parks and reserves where certain invasive species cannot be farmed. Goats, deer and emu should not be farmed within 5 km of a reserve managed for conservation purposes. •Prohibition of the farming of known animal pests outside their feral range. •Control programmes for feral populations of goats, deer, pigs, and other animals as appropriate. •Prohibition of the grazing of domestic stock in: Native forest and shrublands where they prevent regeneration and 	Reject	<p>Farming of mustelids and wallabies is managed by the Ministry for Primary Industries, not Council.</p> <p>The management of farmed deer and associated buffer zones is the role of the Department of Conservation. A Good Neighbour Rule has been included for feral goats in this Plan.</p> <p>Feral deer, goats and pigs are declared pests in the Hawke's Bay region, listed under the Site-led programme. It is an offence against the Biosecurity Act to release these pests.</p> <p>The prohibition of the grazing of domestic stock sits outside the remit of this Plan.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			risk contraction of Bovine TB; and the beds and riparian margins of lakes, rivers, streams and wetlands. Such grazing results in the contamination of waterways, destroys valuable riparian vegetation protecting in-stream values, and accelerates the spread of weeds.		
21.14	Forest & Bird (head office)	<p>22. Forest & Bird support the existing list of animal pests and consider council should add the following species to the animal pest list:</p> <ul style="list-style-type: none"> •Australian magpie •Chinchilla •Darwin's ant •Feral cattle •Hare •Hedgehogs •Peacock •Plague (rainbow) skink 	<p>Add the following species to the animal pest list:</p> <ul style="list-style-type: none"> •Australian magpie •Chinchilla •Darwin's ant •Feral cattle •Hare •Hedgehogs •Peacock •Plague (rainbow) skink 	Accept in part	<p>Staff recommend hedgehogs be added to the Plan under the Site-led programme.</p> <p>Staff recommend Darwin's ant, magpie and hare are added to the Organisms of Interest list.</p> <p>Staff do not believe feral cattle, chinchilla and peacock warrant being declared pests under this Plan.</p> <p>The Ministry for Primary Industries has listed plague skinks as an Unwanted Organism with an agreement with the Department of Conservation in responding to reports.</p>
21.15	Forest & Bird (head office)	Marine Biosecurity			These species are not present in New Zealand and are therefore outside the remit

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>23. Forest and Bird is pleased that some invasive marine species have been included in the Plan, e.g. Mediterranean Fanworm and Clubbed Tunicate. However we believe the following organisms should also be included in the exclusion programme:</p> <ul style="list-style-type: none"> •European shore (or green) Crab (<i>Carcinus maenas</i>) •Northern Pacific seastar (<i>Asterias amurensis</i>) •Chinese mitten crab (<i>Eriorchelidon sinensis</i>) •Green seaweed (<i>Caulerpa taxifolia</i>) •Asian clam (<i>Potamocorbula amurensis</i>) •Comb jelly (<i>Mnemiopsis leidyi</i>) 	<p>The following organisms should also be included in the exclusion programme:</p> <ul style="list-style-type: none"> •European shore (or green) Crab (<i>Carcinus maenas</i>) •Northern Pacific seastar (<i>Asterias amurensis</i>) •Chinese mitten crab (<i>Eriorchelidon sinensis</i>) •Green seaweed (<i>Caulerpa taxifolia</i>) •Asian clam (<i>Potamocorbula amurensis</i>) •Comb jelly (<i>Mnemiopsis leidyi</i>) 	Reject	of this Plan. The Ministry for Primary Industries is the agency responsible for responding if an incursion was to be detected.
21.16	Forest & Bird (head office)	<p>Napier Port</p> <p>24. The RPMP needs to be strategic regarding priorities on the actual and potential threats created by the Napier Port. Surveillance of tourism areas and container depots is a high priority. Issues include:</p> <ul style="list-style-type: none"> •Pre border and border biosecurity programmes including risk analysis. •Marine biosecurity, in particular monitoring and the movement of pests via ballast water. 	No relief stated	Note	<p>The purpose of a Regional Pest Management Plan is to manage pests that are established in New Zealand. Council will be working closely with the Napier Port in delivering its Marine Biosecurity programme.</p> <p>Please also refer No 21.15</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<ul style="list-style-type: none"> Identifying the port of origin, both overseas and other NZ ports, and implementing the appropriate level of response. 			
21.17	Forest & Bird (head office)	<p>Phyosanitary Disease</p> <p>25. Phyosanitary disease is given particular attention in the plan however this is largely limited to an economic perspective. Forest & Bird notes the significant impact diseases such as myrtle rust could have on the local environment and conservation efforts, as well as industries such as beekeeping, and recommend council add myrtle rust to the list of exclusion pests or Ool list as a minimum. Council needs to take a proactive approach to the risk myrtle rust poses to the region, particularly as the climate continues to change.</p>	Add myrtle rust to the list of exclusion pests or Ool list as a minimum.	Reject	The Ministry for Primary Industries is responsible for the management of myrtle rust. Council is currently working alongside the ministry and the Department of Conservation in surveillance of myrtle rust and in a seed banking programme.
21.18	Forest & Bird (head office)	<p>Aquatic Pests</p> <p>26. Introduced plant and animal pests have invaded a significant proportion of New Zealand's freshwater ecosystems and pose a substantial environmental and economic risk to the region. Many of these pest species have a substantial impact on ecosystems and native species, as well as on recreation and tourism opportunities/benefits.</p> <p>27. The Plan should establish an aquatic pest list. Council could work with DOC to establish which species should be included on this list.</p>	<p>27. The Plan should establish an aquatic pest list. Council could work with DOC to establish which species should be included on this list.</p> <p>28. Council should consider the inclusion of these pest fish species in particular:</p> <ul style="list-style-type: none"> Ameiurus nebulosus, Brown bullhead catfish 	Accept in part	<p>Staff acknowledge the risk aquatic pest plants and pest fish can have on a freshwater ecosystem. Four aquatic pest plants and two aquatic pest animals are included in the Plan under Exclusion, with the aim of preventing these species from establishing in the region.</p> <p>The Department of Conservation has a programme of survey, education, signage and, in some situations, eradication of pest fish where possible. Council has communicated to the Department of Conservation that it is open to a</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>28. Council should consider the inclusion of these pest fish species in particular:</p> <ul style="list-style-type: none"> •Ameiurus nebulosus, Brown bullhead catfish •Carassius auratus, Goldfish •Cyprinus carpio, Koi carp, common carp •Gambusia affinis, Gambusia •Gobio gobio, Gudgeon •Leuciscus idus, Orfe, golden orfe, ide •Perca fluviatilis, Perch, redfin perch •Scardinius erythrophthalmus, Rudd •Tinca tinca, Tench 	<ul style="list-style-type: none"> •Carassius auratus, Goldfish •Cyprinus carpio, Koi carp, common carp •Gambusia affinis, Gambusia •Gobio gobio, Gudgeon •Leuciscus idus, Orfe, golden orfe, ide •Perca fluviatilis, Perch, redfin perch •Scardinius erythrophthalmus, Rudd •Tinca tinca, Tench 		<p>conversation of how we might manage invasive fish collectively outside this Plan.</p> <p>It is important to note the variety of legislation that governs freshwater fish in New Zealand. For example under the Conservation Act 1987, to introduce any aquatic life (native or introduced fish, plants or invertebrates) into an area where they don't already occur, requires a permit from the Minister of Conservation, otherwise the person responsible could be liable for a fine of \$5,000.</p> <p>The taking and holding of some fish requires a special permit from the Ministry of Primary Industries. Approval of Fish and Game New Zealand is required to hold live sportsfish and Gambusia, or introduce fish or fish eggs to sportsfish or game bird habitats. Perch and tench are classed as a coarse fish under section 26R (3) of the Conservation Act 1987 and are managed by Fish and Game New Zealand.</p>
21.19	Forest & Bird (head office)	<p>Deer, goats and pigs</p> <p>29. Forest & Bird believe a strong stance is required on feral pigs, goats and deer as these species in conjunction with possums are a serious barrier to indigenous forest regeneration.</p>	<p>32. Forest & Bird suggest a rule requiring farmers with these species to ensure that their boundary fences are in good order, with</p>		<p>Feral deer are currently declared a pest in site-led areas, with the aim of supporting the community in undertaking feral deer control at sites of ecological importance. The Ecosystem Prioritisation process undertaken outside of the RPMP process has highlighted key areas for Council to focus its</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>30. Forest and Bird notes that the Department of Conservation’s Policy Statement on Deer Control clearly states that feral deer are a serious pest. This is not incompatible with deer farming operations that maintain high standards as has been demonstrated around New Zealand.</p> <p>31. Forest & Bird are concerned about the number of feral deer in some areas of Hawkes Bay and the impact they are having on native vegetation. Feral deer are largely ignored in our lowlands. Forest & Bird support the inclusion of deer in the list of pest animal species, and encourage the HBRC and the Department of Conservation to work cooperatively to control feral deer in the Hawkes Bay. Forest & Bird also believe HBRC should have the ability to manage feral deer on private property where required or work with landowners to achieve deer control on private property.</p> <p>32. Forest & Bird suggest a rule requiring farmers with these species to ensure that their boundary fences are in good order, with penalties for breaches. Landowners should be charged for control operations where there are breaches of the boundaries.</p> <p>33. Forest and Bird are aware of numerous illegal releases of deer and pigs throughout New Zealand which are causing significant conservation problems. A tough stance from HBRC will send strong signals that the illegal release of pest species will not be tolerated.</p>	<p>penalties for breaches. Landowners should be charged for control operations where there are breaches of the boundaries.</p>	<p>Reject</p>	<p>efforts with funding attached to this. This funding includes some resourcing for fencing.</p> <p>The Department of Conservation are the management agency responsible for the risk posed by deer farms and responding to deer escapees from deer farms.</p> <p>Staff agree that illegal releases of deer and pigs can have significant impacts on ecological sites. Council would take a tough stance on any illegal release brought to attention.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
21.20	Forest & Bird (head office)	<p>Pest Management Programmes</p> <p>34. Forest & Bird support section 5.2 'Pest management programmes' and the associated management actions available to Council.</p>	Support section 5.2 'Pest management programmes' and the associated management actions available to Council	Note	
21.21	Forest & Bird (head office)	<p>Information on Animal Pest Control</p> <p>35. Forest & Bird recommend the inclusion of an explanation on the benefits and impacts of toxins used in the control of animal pests. This would inform and raise public awareness of the facts associated with tools such as 1080. This could be presented in a tabular format and be informed by the information put together by commercial and conservation organisations on the website http://www.1080facts.co.nz/ as well as that put together by the Parliamentary Commissioner for the Environment.</p>	Recommend the inclusion of an explanation on the benefits and impacts of toxins used in the control of animal pests	Reject	The relief sought is outside the scope of the RPMP. It is not the remit of the Plan to detail which pesticides should be used and when. When Council undertakes control on behalf of land occupiers or on its own land, best practice is followed to minimise non-target effects from the use of animal pesticides. Council does not administer Department of Conservation land.
22	Donald Bauckam	<p>I would like to bring to your attention ; That possum control is only required where the "land owners property is greater than 4ha". We presently live in an area where we carry out pest control thru a contractor. A lot of effort is put into eradicating possums from our farm.</p> <p>It is very disheartening when I drive thru "lifestyle block" areas to find dead possums on the roads and</p>	No relief stated but implies that the Possum Control Programme should apply to any property regardless of size.		Although the Good Neighbour Rule only applies to a 500m strip, for adjacent land occupiers to achieve a possum density of 5% within this strip, possum control will be required across a much larger area. This will result in a reduction in possum migration out of non-controlled areas. Council will undertake monitoring within Good Neighbour Rule areas based on risk (habitat

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>learning that these folk are exempt from possum control efforts.</p> <p>When you have areas of multiple lifestyle properties backing onto one another and then bounding a large farm it makes life rather difficult for a farmer to meet his obligations when his neighbours are exempt as their properties are under your 4ha threshold. These properties could cover 50ha or more in total with areas of bushline included. I'm not sure if enacting the "good neighbour rule" would achieve anything as it only covers 500mtrs?</p> <p>Basically my argument is if you live in a rural area you abide by the same rules as everyone else. No one should be exempt if you wish to have a total eradication of possums & pests as proposed by our previous government. Otherwise this is another waste of ratepayer / taxpayer dollars and a half hearted attempt to do a proper job.</p>		Reject	type, last known control etc), trend data and complaints.
23.1	Morgan Foundation	<p>This submission is on the proposed Regional Pest Management Plan</p> <p>Firstly we'd like to commend you on a comprehensive and detailed plan. Hawke's Bay Regional Council have been involved in some inspirational landscape scale predator projects and we commend you on your work to date.</p> <p>This submission is in regards to Description of Feral cats (p.64) which is used in two parts of the proposed plan:</p>	We support feral cats being included as a pest for sustained control and suggest councils accepts this inclusion in the plan.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>6.4.5 Managing Predators (ferret, stoat, weasel and feral cat) for sustained control p.63</p> <p>6.5.1 Feral cats to be managed under site-led programmes p.78</p> <p>We support feral cats being included as a pest for sustained control and suggest councils accepts this inclusion in the plan.</p>			
23.2	Morgan Foundation	<p>We support feral cats being included as a site led pest and agree that there are sensitive wildlife areas where it is essential for cats to be managed to achieve desired biodiversity outcomes. However the definition of a feral cat (p64) is not useful enough for cat control to be carried out near populated areas.</p> <p>The Morgan Foundation would like to see the term “feral cat” renamed to “pest cat” (as per Auckland Council Proposed RPMP). This would ensure all unowned wandering cats were included in the defition.</p>	We suggest council change the term “feral cat” to “pest cat”.	Reject	Council’s focus for predator management over the next 10 years is on sites of high biodiversity value and the farmland landscape. Staff believe the current definition is fit for purpose. An alternate definition would not add additional value to the predator control programme. Council will review its definition of feral cats during the next Plan review and will adopt a new definition if the current definition is no longer fit for purpose.
23.3	Morgan Foundation	The Morgan Foundation would also like to see a clearer definition of a feral cat so that cats can be managed in sensitive wildlife areas near populated areas. An appropriate definition would define a feral cat as any cat without a registered microchip, collar or harness. Therefore where it was determined that cat control was necessary to protect biodiversity at a site near a populated areas it would be possible to determine which cats were owned and which were unowned.	Clearer definition of a feral cat so that cats can be managed in sensitive wildlife areas near populated areas. An appropriate definition would define a feral cat as any cat without a registered microchip, collar or harness.	Reject	Please refer to 23.2

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>We recognise that council may not be focused on sites near populated area but are confident that you will need to be during the lifespan of this plan. There may also be community groups that are working at sites near populated areas where cats are a problem. Therefore in order to future proof the plan we would suggest improving the definition of a feral cat to ensure cat control can occur near populated areas in future.</p> <p>Using a definition of a registered microchip means that near specific cats, owned cats would need to be microchipped. This would allow any cats trapped within the area to be identified as owned or pest. Any microchipped cats could be safely returned to their owners (letting them know their cat has been found in a sensitive wildlife area), and any other cats could be rehomed or humanely euthanised.</p> <p>Wandering cats have an impact on native biodiversity through the predation of native birds, reptiles and insects. Studies have shown that in populated areas cats kill native birds faster than they can breed. The damage inflicted on native lizards and invertebrates is unknown but probably even greater. This is a huge issue for our native wildlife, and one we need to deal with.</p> <p>Cats are one of the biggest threats to the predator control work done by HBRC, landowners and community groups. Currently cat control near</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>populated area is unfeasible because there is no clear means of determining if a cat is owned or not.</p> <p>Microchipping and managing cats also brings many side benefits. It is good for cat welfare, which is why it is promoted by the SPCA and NZVA. Following the Christchurch Earthquake microchipped cats were far more likely to be returned to their owners.</p> <p>Cats also have an affect on primary production and human health. So controlling pest cats is beneficial to all.. Cats are the primary transmission vector for toxoplasmosis, a serious illness in both humans and sheep. Most farmers immunise their sheep but the immunisation is not 100% effective and storms of toxoplasmosis can still devastate flocks. Toxoplasmosis should also be listed in the description of feral cats.</p>			
23.4	Morgan Foundation	There is currently no mention about the creation or supporting of cat colonies within the region. There are a number of other regions that are considering making rules to prevent the establishment or maintenance of cat colonies.	No relief stated	Note	It is not the purpose of this Plan to manage cat colonies. Council does not currently have the capacity to establish, manage and enforce a cat colony programme. It is of staff's view that this should sit with local authorities as dog control does.
23.5	Morgan Foundation	Abandoning cats should also be considered an offence.	Abandoning cats should also be considered an offence.	Reject	Please refer to No 23.4

No.	Name	Submission	Relief	Staff Recommendation	Reasons
24.1	Predator Free New Zealand Trust	4.1 Organisms declared as pests p.23 We support the list of animals declared as pests however would like council to consider the addition of hedgehogs as a pest for site-led management.	We suggest council adds hedgehogs as a site-led pest.	Accept	Staff recommend hedgehogs be added to 6.5 <i>Pests to be managed under site-led programmes.</i>
24.2	Predator Free New Zealand Trust	6.2.9 Managing Possums in eradication programmes p.41 We support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. We support the plan to eradicate possums and for council to embrace new technologies as they become available to eradicate possums.	We suggest the council accepts this addition to the plan.	Accept	
24.3	Predator Free New Zealand Trust	Plan Rule 3 p. 42 We support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.	We recommend that council accepts this change to the plan.	Accept	
24.4	Predator Free New Zealand Trust	6.4.4 Managing Possums for sustained control Objective 9 p.61 We support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.	We recommend council accepts this addition to the plan	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
24.5	Predator Free New Zealand Trust	Plan Rule 10 p.62 We support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so We support council having sufficient means to ensure that occupiers are abiding by this measure.	Council should accept this proposed rule	Accept	
24.6	Predator Free New Zealand Trust	Good Neighbour Rule for Possums - Plan Rule 11 p. 63 We support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.	Council should accept this proposed rule	Accept in part	Please note staff are recommending changing the RTC requirement for a Good Neighbour Rule to 5% as a result of submissions
24.7	Predator Free New Zealand Trust	6.4.5 Managing Predators (ferret, stoat, weasel and feral cat) for sustained control p.63 Description of Feral cats p.64 We support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst we understand the current focus of the council is on rural land we believe there needs to	We would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral We would like council to change the definition of a pest cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be	Reject	Council’s focus for predator management over the next 10 years is on sites of high biodiversity value and the farmland landscape. Staff believe the current definition is fit for purpose. An alternate definition would not add additional value to the predator control programme. Council will review its definition of feral cats during the next Plan review and will adopt a new definition if the current definition is no longer fit for purpose.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. In order to protect domestic cats and also to allow cat control to occur in areas near urban settlements we believe feral cats need to be defined as a cat without a registered microchip. We also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.	owned domestic cats present		
24.8	Predator Free New Zealand Trust	Managing Predators (ferret, stoat, weasel and feral cat) for sustained control - Plan rule 12 p65 We support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. We highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.	We suggest council accepts Plan rule 12	Accept	
24.9	Predator Free New Zealand Trust	6.5.1 Feral cats to be managed under site-led programmes p.78 We support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst we understand the current focus of the council is on rural land we believe there needs to	We would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral. We recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites	Reject	Please refer to No 24.7

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. We believe feral cats need to be defined as a cat without a registered microchip.</p> <p>We also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	where there may be owned domestic cats present.		
24.10	Predator Free New Zealand Trust	<p>6.5.5 Mustelids to be managed under site-led programmes p.80</p> <p>We support the inclusion of mustelids (stoats, ferrets and weasels) as a site-led pest.</p>	We suggest council accepts this inclusion.	Accept	
24.11	Predator Free New Zealand Trust	<p>6.5.6 Possums to be managed under site-led programmes p.80</p> <p>We support the inclusion of possums as a site-led pest.</p>	We suggest council accepts this inclusion.	Accept	
24.12	Predator Free New Zealand Trust	<p>6.5.7 Rats to be managed under site-led programmes p.80</p> <p>We agree with the inclusion of both Norway and Ship rats as site-led pests</p>	We suggest council accepts this inclusion.	Accept	
	Predator Free New Zealand Trust	<p>6.5 Hedgehogs and mice</p> <p>We would like to see the inclusion of Hedgehogs and mice as pests to be managed under site-led programmes.</p>	Inclusion of Hedgehogs and mice as pests to be managed under site-led programmes	Accept in part	Staff recommend hedgehogs be added to 6.5 <i>Pests to be managed under site-led programmes.</i>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
24.13	Predator Free New Zealand Trust	Objective 13 p.80 We support Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.	We suggest council accepts this inclusion	Accept	
25.1	Predator Free New Zealand (PFNZ) Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, P Gilliland, Lyn Gribble, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Tim McCormick	6.2.9 Managing possums in eradication programmes p.41 I support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums.	I suggest the council accepts this addition to the plan.	Accept	
25.2	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, P Gilliland, Lyn Gribble, Wendy	Plan Rule 3 p.42 I support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.	I recommend that council accepts this change to the plan.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Blair Rossiter, Tim McCormick, Anne Batley-Burton				
25.3	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, P Gilliland, Lyn Gribble, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Tim McCormick, Anne Batley-Burton	6.4.4 Managing possums for sustained control p.69 I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.	I recommend council accepts this addition to the plan.	Accept	
25.4	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, P Gilliland, Lyn Gribble, Wendy Blount, Greg	Plan Rule 10 (Possum Control Areas) p.62 I support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.	Council should accept this proposed rule.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Hart, Kay Griffiths, Nick Ratcliffe, Blair Rossiter, Tim McCormick, Anne Batley-Burton				
25.5	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, P Gilliland, Lyn Gribble, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Blair Rossiter, Tim McCormick, Anne Batley-Burton	Good Neighbour Rule for possums - Plan Rule 11 p. 63 I support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.	Council should accept this proposed rule.	Accept in part	Please note staff are recommending changing the RTC requirement for a Good Neighbour Rule to 5% as a result of submissions.
25.6	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, Mike Currie, Wendy Blount, Greg Hart, Kay Griffiths, Nick	Description of feral cats p.64 I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.	I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral. I would like council to change the definition of a feral cat to a cat without a registered microchip to	Reject	Council’s focus for predator management over the next 10 years is on sites of high biodiversity value and the farmland landscape. Staff believe the current definition is fit for purpose. An alternate definition would not add additional value to predator the control programme. Council will review its definition of feral cats during the next Plan review and will adopt a new

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Ratcliffe, Blair Rossiter, Tim McCormick	Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip. I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.	allow pest cats to be managed at sites where there may be owned domestic cats present.		definition if the current definition is no longer fit for purpose.
25.7	PFNZ Trust online submission form: P Gilliland	Description of feral cats p.64 I support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip. I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.	I would NOT like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral. I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.	Reject	Please refer to No 25.6
25.8	PFNZ Trust online submission form: Lyn Gribble	Description of feral cats p.64 I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are	I DO NOT SUPPORT THIS IN ANYWAY. LEAVE THE CATS ALONE		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p> <p>I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral.</p> <p>I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.</p>		Note	
25.9	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, , Mike Currie, Lyn Gribble, Wendy Blount, Greg	<p>Managing predators for sustained control - Plan rule 12 p65</p> <p>I support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production</p>	I suggest council accepts Plan rule 12.	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Hart, Kay Griffiths, Nick Ratcliffe, Blair Rossiter, Tim McCormick	through the control of predators and vectors of diseases.			
25.10	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, , Mike Currie, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Blair Rossiter, Tim McCormick	<p>6.5.1 Feral cats to be managed under site-led programmes p.78 I support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.</p>	<p>I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral.</p> <p>I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.</p>	Reject	Please refer to No 25.6
25.11	PFNZ Trust online submission form: Lyn Gribble	<p>6.5.1 Feral cats to be managed under site-led programmes p.78 I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely</p>	<p>I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be</p>		Please refer to No 25.6

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p> <p>I would like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.</p>	<p>owned domestic cats present.</p> <p>WHAT ARE YOU THINKING. CATS WILL SUFFER WHEN OWNERS DONT MICROCHIP. THIS INCLUDES COLONY CATS THAT HAVE BEEN NEUTERED AND ARE BEING FED. LEAVE THEM ALONE AND LOOK AT THE EVIDENCE IT IS PEOPLE, CARS AND NOT CATS CAUSING THE DAMAGE. YOU PEOPLE GO TOO FAR AND THIS IS RIDICULOUS.</p>	Reject	
25.12	<p>PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, , Mike Currie, P Gilliland, Lyn Gribble, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Tim McCormick</p>	<p>6.5 Pest to be managed under site-led programmes p.80</p> <p>I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.</p> <p>I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.</p>	<p>I suggest council accepts these inclusions and Objective 13.</p>	Accept	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.13	PFNZ Trust online submission form: Conor Paul, Mary Gray, Brendan Veale, Karin Johansson, , Mike Currie, Lyn Gribble, Wendy Blount, Greg Hart, Kay Griffiths, Nick Ratcliffe, Tim McCormick	6.5 Hedgehogs and mice I would like hedgehogs and mice included as a pest to be managed under site-led programmes.	I suggest council adds hedgehogs and mice as a site-led pests.	Accept in part	Staff recommend hedgehog be added to 6.5 <i>Pests to be managed under site-led programmes.</i>
25.14	PFNZ Trust online submission form: Conor Paul	Urban rat problems are noticeable near Bluff Hill lookout and on the park below on the Port side.	No relief stated	Note	
25.15	PFNZ Trust online submission form: Mary Gray	I am involved with trapping on DOC land in the Kawekas. There has been a noticeable increase in feral cats the last few years.	No relief stated	Note	
25.16	PFNZ Trust online submission form: Lyn Gribble	LEAVE CATS OUT OF IT. THEY PROVIDE COMPANY TO PEOPLE AND FORM AN IMPORTANT PART IN OUR SOCIETY. IT IS RIDICULOUS AND BARBARIC WHAT IS BEING PROPOSED.	No relief stated put implies the removal of cats from the Plan	Reject	
25.17	PFNZ Trust online submission form: Wendy Blount	With the recent malfunction of some micro chips, how would you guarantee that there would not be owned cats from being destroyed. You cant!	No relief stated	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.18	PFNZ Trust online submission form: Greg Hart	I am very appreciative of the work HBRC has completed on this farm to basically eradicate possums (not one seen in over 14 years) which has enabled us to plant over 106,000 trees on the property since 2008 which would not have been possible if possums were at previous levels. I am also grateful for the support HBRC has given us to implement a pest control trapping system in a QE2 block of native bush on the farm in partnership with other businesses and individuals. Thanks to these initiatives life is exploding at Mangarara Station.	No relief stated	Note	Staff thank Mangarara Station for this feedback.
25.19	PFNZ Trust online submission form: Martin Broadbent	6.2.9 Managing possums in eradication programmes p.41 I not support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I support the plan to eradicate possums.	I suggest the council accepts this addition to the plan.	Reject	
25.20	PFNZ Trust online submission form: Martin Broadbent	Plan Rule 3 p.42 I would not support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.	I recommend that council accepts this change to the plan.	Reject	
25.21	PFNZ Trust online submission form: Martin Broadbent	6.4.4 Managing possums for sustained control p.69 I do not support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse	I recommend council accepts this addition to the plan.	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		effects on environmental values and economic well-being within the region.			
25.22	PFNZ Trust online submission form: Martin Broadbent	Plan Rule 10 (Possum Control Areas) p.62 I do not support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.	Council should accept this proposed rule.	Reject	
25.23	PFNZ Trust online submission form: Martin Broadbent	Good Neighbour Rule for possums - Plan Rule 11 p. 63 I do not support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.	Council should accept this proposed rule.	Reject	
25.24	PFNZ Trust online submission form: P Gilliland	Description of feral cats p.64 I do not support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP	I would like council to rename feral cats to “pest cats” to include all unowned cats - stray and feral. I would like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where	Note	The submission and relief appear to be contradictory. It is unclear what the reader is suggesting.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip. I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.	there may be owned domestic cats present.		
Insert	<u>AMENDMENT</u> PFNZ Trust online submission form: Martin Broadbent	<u>Submission amended 14/06/18</u> Description of feral cats p.64 I do not support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I believe feral cats need to be defined as a cat without a registered microchip. I would like the name "feral cat" changed to "cat" and that all cats should not be lethally controlled. Unowned cats should be trapped neutered and released.	<u>Amended 14/06/18</u> I would like the council not to rename any, owned, unowned cat to a "pest cat". I would like the council to not change the definition of a feral cat to a cat without a registered microchip because too many domestic cats would be caught up in lethal management on sites close to people's homes. I do not believe those checking for microchips would be stringent enough. Too many innocent lives would be lost and upset to the owners.	<u>Amended 14/06/18</u> Reject	<u>Amended 14/06/18</u> Please refer to No 25.6
25.25	PFNZ Trust online submission form:	Managing predators for sustained control - Plan rule 12 p65	I suggest council accepts Plan rule 12.		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Martin Broadbent, P Gilliland	I do not support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.		Note	The submission and relief appear to be contradictory. It is unclear what the reader is suggesting.
25.26	PFNZ Trust online submission form: Linda Mayne	Managing predators for sustained control - Plan rule 12 p65 I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I DO NOT commend the council in their active engagement with communities in order to establish these areas. Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.	I suggest council accepts Plan rule 12.		
25.27	PFNZ Trust online submission form: Martin Broadbent	6.5.1 Feral cats to be managed under site-led programmes p.78 I do not support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer	I would like council to rename "feral cats" to "pest cats" to include all unowned cats - stray and feral. I recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to	Note	The submission and relief appear to be contradictory. It is unclear what the reader is suggesting.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also suggest changing the name from "feral cat" to "pest cat" - this ensures that unowned stray cats can also be controlled.</p>	be managed at sites where there may be owned domestic cats present.		
25.28	PFNZ Trust online submission form: Martin Broadbent	<p>6.5 Pest to be managed under site-led programmes p.80</p> <p>I do not support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.</p> <p>I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.</p>	I suggest council accepts these inclusions and Objective 13.	Note	The submission and relief appear to be contradictory. It is unclear what the reader is suggesting.
25.29	PFNZ Trust online submission form: Linda Mayne	<p>6.5 Pest to be managed under site-led programmes p.80</p> <p>I DO NOT support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.</p> <p>I DO NOT agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.</p>	I suggest council accepts these inclusions and Objective 13.	Reject	
25.30	PFNZ Trust online submission form:	<p>6.5 Hedgehogs and mice</p> <p>I would not like hedgehogs and mice included as a pest to be managed under site-led programmes.</p>	I suggest council adds hedgehogs and mice as a site-led pests.	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Martin Broadbent, P Gilliland				
25.31	PFNZ Trust online submission form: Martin Broadbent	Predator Free 2050 are not to be trusted about their lies about cats especially.	No relief stated	Note	
25.32	PFNZ Trust online submission form: C McCulloch, Keryn Parkes, Linda Mayne	I DO NOT support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes. I DO NOT support the plan to eradicate possums.	I DO NOT suggest the council accepts this addition to the plan.	Reject	
25.33	PFNZ Trust online submission form: C McCulloch, Keryn Parkes, Linda Mayne	Plan Rule 3 p.42 I DO NOT support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.	I DO NOT recommend that council accepts this change to the plan.	Reject	
25.34	PFNZ Trust online submission form: C McCulloch, Keryn Parkes, Linda Mayne	6.4.4 Managing possums for sustained control p.69 I DO NOT support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.	I DO NOT recommend council accepts this addition to the plan.	Reject	
25.35	PFNZ Trust online submission form: C McCulloch, Keryn Parkes	Plan Rule 10 (Possum Control Areas) p.62 I DO NOT support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%.	Council should NOT accept this proposed rule.		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I DO NOT support council having sufficient means to ensure that occupiers are abiding by this measure.		Reject	
25.36	PFNZ Trust online submission form: Linda Mayne	Plan Rule 10 (Possum Control Areas) p.62 I DO NOT support the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I DO NOT support council having sufficient means to ensure that occupiers are abiding by this measure.	Council should accept this proposed rule.	Reject	
25.37	PFNZ Trust online submission form: C McCulloch, Keryn Parkes, Linda Mayne	Good Neighbour Rule for possums - Plan Rule 11 p. 63 I DO NOT support a Good Neighbour rule for possums requiring neighbouring properties to maintain a 4% RTC within 500m of the boundary. Controlling possums protects primary production and biodiversity.	Council should NOT accept this proposed rule.	Reject	
25.38	PFNZ Trust online submission form: C McCulloch	Description of feral cats p.64 I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely	I would NOT like council to rename feral cats to "pest cats" to include all unowned cats - stray and feral.		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DO NOT believe feral cats need to be defined as a cat without a registered microchip. I also DO NOT suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	<p>I would NOT like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.</p>	<p>Reject</p>	
25.39	<p>PFNZ Trust online submission form: Keryn Parkes</p>	<p>Description of feral cats p.64</p> <p>I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and ARE NOT destructive to our native wildlife. Feral cats DO NOT differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats DO NOT exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to NOT be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DO NOT believe feral cats need to be defined as a cat without a registered microchip. I also suggest NOT changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	<p>I would like council to NOT rename feral cats to “pest cats” to include all unowned cats - stray and feral.</p> <p>I would like council to NOT change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.</p> <p>STOP THIS INSANE PROPOSAL ON CLASSIFYING CATS AS PESTS. THIS OBJECTIVE IS GOING TO ENCOURAGE ANIMAL CRUELTY IN</p>	<p>Reject</p>	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			SHOOTING, GIN TRAPPING, WRINGING CATS NECKS IN THE MOST INHUMANE WAY OF COMPANION SENTIENT ANIMALS. THIS OBJECTIVE HAS TO BE STOPPED. THERE IS ALREADY ENOUGH ANIMAL ABUSE IN NZ, THIS POLICY IS GOING TO ENCOURAGE IT EVEN FURTHUR.		
25.40	PFNZ Trust online submission form: Linda Mayne	Description of feral cats p.64 I DO NOT support the inclusion of feral cats for sustained control. Cats owned or unowned are highly skilled hunters and very destructive to our native wildlife. Feral cats differ from other predators as they are a popular domestic pet, and differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged. Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the RPMP and enable cat control near settlements in the future. I DEFINITELY DO NOT believe feral cats need to be defined as a cat without a registered microchip. I DO NOT suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.	I STRONGLY OBJECT TO COUNCIL RENAMING feral cats to “pest cats” to include all unowned cats - stray and feral. I would NOT like council to change the definition of a feral cat to a cat without a registered microchip to allow pest cats to be managed at sites where there may be owned domestic cats present.	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.41	PFNZ Trust online submission form: C McCulloch, Keryn Parkes	<p>Managing predators for sustained control - Plan rule 12 p65</p> <p>I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. I highly commend the council in their active engagement with communities in order to establish these areas.</p> <p>Creating these area will allow native biodiversity to flourish as well as enhancing primary production through the control of predators and vectors of diseases.</p>	I suggest council DOES NOT accepts Plan rule 12.	Reject	
25.42	PFNZ Trust online submission form: C McCulloch	<p>6.5.1 Feral cats to be managed under site-led programmes p.78</p> <p>I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also DO NOT suggest changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	<p>I would NOT like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.</p> <p>I DO NOT recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral cats to be managed at sites where there may be owned domestic cats present.</p>	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.43	PFNZ Trust online submission form: Keryn Parkes	<p>6.5.1 Feral cats to be managed under site-led programmes p.78 I DO NOT support the inclusion of feral cats at specific sites. Feral cats DO NOT differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats DO NOT exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I DO NOT believe there needs to be a clearer definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I also suggest DONT change the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	<p>I would like council to NOT rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.</p> <p>I recommend council NOT changes the definition of a feral cat to a cat without a microchip. This would NOT allow feral cats to be managed at sites where there may be owned domestic cats present.</p>	Reject	
25.44	PFNZ Trust online submission form: Linda Mayne	<p>6.5.1 Feral cats to be managed under site-led programmes p.78 I DO NOT support the inclusion of feral cats at specific sites. Feral cats differ from other predators names as they are a popular domestic pet. And differentiating between them can be extremely difficult. Feral cats and domestic cats can exhibit similar behaviours when caged.</p> <p>Whilst I understand the current focus of the council is on rural land I believe there needs to be a clearer</p>	<p>I would NOT like council to rename “feral cats” to “pest cats” to include all unowned cats - stray and feral.</p> <p>I DO NOT recommend council changes the definition of a feral cat to a cat without a microchip. This would allow feral</p>	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>definition of a feral cat to future proof the plan and enable cat control to occur near settlements where there are owned cats. I DO NOT believe feral cats need to be defined as a cat without a registered microchip.</p> <p>I OBJECT TO THE SUGGESTION OF changing the name from “feral cat” to “pest cat” - this ensures that unowned stray cats can also be controlled.</p>	cats to be managed at sites where there may be owned domestic cats present.		
25.45	PFNZ Trust online submission form: C McCulloch, Keryn Parkes	<p>6.5 Pest to be managed under site-led programmes p.80</p> <p>I DO NOT support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests.</p> <p>I DO NOT agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.</p>	I DO NOT suggest council accepts these inclusions and Objective 13.	Reject	
25.46	PFNZ Trust online submission form: C McCulloch, Keryn Parkes	<p>6.5 Hedgehogs and mice</p> <p>I would NOT like hedgehogs and mice included as a pest to be managed under site-led programmes.</p>	I DO NOT suggest council adds hedgehogs and mice as a site-led pests	Reject	
25.47	PFNZ Trust online submission form: Linda Mayne	I SEE NO REASON WHATSOEVER WHY hedgehogs and mice included as a pest to be managed under site-led programmes.	I OBJECT TO COUNCIL placing hedgehogs and mice as a site-led pests.	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.48	PFNZ Trust online submission form: C McCulloch	I DO NOT SUPPORT ANY NOTION OR METHODS UNDERTAKEN TOWARDS A PREDATOR FREE NZ. I DO NOT SUPPORT PREDATOR FREE NZ, NOR USING POISON TO ACHIEVE SUCH A STUPID GOAL. I TOTALLY STAND AGAINST ANY UNDERTAKING TO CLASS CATS AS PESTS AT ALL. I ALSO DO NOT SUPPORT THE UNDEMOCRATIC WAY THAT THIS SUBMISSION HAS BEEN DESIGNED...WHERE IS THE OPTION TO DISAGREE?	No relief stated	Note	Please note Council was unaware of the development of this online submission form by Predator Free New Zealand Trust.
25.49	PFNZ Trust online submission form: Keryn Parkes	PEST FREE 2050 HAS TO BE MANAGED HUMANLY. POSSOMS ARE VEGETARIANS AND DO NOT PROPOSE A THREAT TO BIRDLIFE. THERE ARE NO FIGURES TO BACK THE CAT DEVASTATION ON BIRDLIFE. TOXIPLASMIS IS A NATURALLY OCCURRING TOXIN THAT IS PART OF THE ECOSYSTEM, AND WILL NO DOUBT INFILTRATE WATERWAYS AFFECTING MARINE LIFE - THEIR BIGGEST THREAT IS OTHER PREDATORY MARINE LIFE. INHUMANE KILLING OF POSSOMS, CATS AND HEDGEHOGS WILL INCREASE THE PUBLICS PERCEPTION OF CARING FOR SENTIENT BEINGS, PART OF THE ANIMAL ACT THAT IS NZ IS RENOWN FOR GLOBALLY. DROP OF DEVASTING 1080 AND VIRUSES ON THE ANIMAL POPULATION ALREADY EXISTS, DONT EXACERBATE ANIMAL CRUELTY.	No relief stated	Note	
25.50	PFNZ Trust online submission form: Susan Mottram	6.2.9 Managing possums in eradication programmes p.41 New evidence from Landcare Research does not support the theory that possums damage the	No relief stated	Note	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false.			
25.51	PFNZ Trust online submission form: Susan Mottram	Plan Rule 3 p.42 I do not support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council. New evidence from Landcare Research does not support the theory that possums damage the forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false.	I do not support Plan rule 3 that occupiers shall maintain possum eradication status once eradication has been achieved by council.	Reject	
25.52	PFNZ Trust online submission form: Susan Mottram	6.4.4 Managing possums for sustained control p.69 I object to objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.	I object to objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%.	Reject	
25.53	PFNZ Trust online submission form: Susan Mottram	Plan Rule 10 (Possum Control Areas) p.62 I DO NOT the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%. However, with occupier responsibilities comes a need for council to monitor adherence to this rule and so I support council having sufficient means to ensure that occupiers are abiding by this measure.	I DO NOT the Plan Rule 10 for occupiers within a Possum Control Area to be responsible for maintaining the RTC on their land to less than 4%.	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.54	PFNZ Trust online submission form: Susan Mottram	Good Neighbour Rule for possums - Plan Rule 11 p. 63 I do not support Plan Rule 11 p 63	I do not support Plan Rule 11 p 63	Reject	
25.55	PFNZ Trust online submission form: Susan Mottram	Description of feral cats p.64 I do not support the inclusion of feral cats for sustained control. I do not support the label pest when referencing cats.	I do not support the inclusion of feral cats for sustained control. I do not support the label pest when referencing cats	Reject	
25.56	PFNZ Trust online submission form: Susan Mottram	Managing predators for sustained control - Plan rule 12 p65 I DO NOT support plan rule 12 to convert current Possum Control Areas to Predator Control Areas. New evidence from Landcare Research does not support the theory that possums damage the forest. Possums do not eat birds or birds eggs, this was made up by DoC. The photo of a possum with an egg was staged, The issue of possums carrying TB is false.	i recommend the council rejects Plan rule 12.	Reject	
25.57	PFNZ Trust online submission form: Susan Mottram	6.5.1 Feral cats to be managed under site-led programmes p.78 I do not support the inclusion of feral cats at specific sites. Cats are not referenced as pests in the Animal Welfare Act and council have no power to change this legislation.	I do not support the inclusion of feral cats at specific sites	Reject	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.58	PFNZ Trust online submission form: Susan Mottram	6.5 Hedgehogs and mice I reject any management of hedgehogs and mice, its an ecosystem and mice are a valuable food source for raptors.	I reject any management of hedgehogs and mice	Reject	
25.59	PFNZ Trust online submission form: Blair Rossiter	6.2.9 Managing possums in eradication programmes p.41 I do not support the Objective 3 to eradicate possums within the Possum Eradication Areas. Possums pose a threat to both primary production and biodiversity outcomes.	I support the plan to eradicate possums by other means than aerial 1080 . I suggest the council accepts this addition to the plan.	Reject	The relief sought is outside the scope of the RPMP. It is not the remit of the Plan to detail which pesticides should be used and when. When Council undertakes control on behalf of land occupiers or on its own land, best practice is followed to minimise non-target effects from the use of animal pesticides. Council does not administer Department of Conservation land.
25.60	PFNZ Trust online submission form: Blair Rossiter	6.4.4 Managing possums for sustained control p.69 I support objective 9 to lower the residual trap catch for possums, within the Possum Control Areas, to below 4%. This will minimise adverse effects on environmental values and economic well-being within the region.	I recommend council accepts this addition to the plan. Only through the continued use of trapping.	Reject	Please note No 25.59
25.61	PFNZ Trust online submission form: Blair Rossiter	6.5 Pest to be managed under site-led programmes p.80 I support the inclusion of mustelids (stoats, ferrets and weasels), possums and rats as site-led pests. I agree with Objective 13 to support sustainably controlling population levels of feral cats, feral deer, feral goats, feral pigs, mustelids, possums and rats at sites of ecological importance.	I suggest you remove deer from the list. I suggest council accepts these inclusions and Objective 13.	Accept in part	As noted in the Plan feral deer heavily browse native trees and shrubs which can cause changes in forest structure and the composition of the understorey. Palatable plant species such as schefflera/pate, broadleaf, three-finger, lancewood, and hen and chicken fern can be completely removed from the ground tier.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.62	PFNZ Trust online submission form: Blair Rossiter	6.5 Hedgehogs and mice I would like hedgehogs and mice included as a pest to be managed under site-led programmes. I suggest council adds hedgehogs and mice as a site-led pests. Controlled without the use of poison in the community.	I suggest council adds hedgehogs and mice as a site-led pests. Controlled without the use of poison in the community.	Accept in part	Staff recommend hedgehogs be added to 6.5 <i>Pests to be managed under site-led programmes</i> Please note No 25.59
25.63	PFNZ Trust online submission form: Blair Rossiter	We already have the wide spread use of poisons be they baits or sprays. Zero human health studies have been undertaken on the long term effects on the environment or people living amongst these poisons.	No relief sought	Note	Please note No 25.59
25.64	PFNZ Trust online submission form: Anne Batley-Burton	6.2.9 Managing possums in eradication programmes p.41 i Do not support Oosdum eradication plans There is no longer a need since The TB virus is practically non Existent.	i Do not support Oosdum eradication plans	Note	
25.65	PFNZ Trust online submission form: Anne Batley-Burton	Description of feral cats p.64 I totally oppose your propositions. Under the Animal Welfare Act, cats are sentient beings and there are many reasons (if you took the time to think about them) as to why they should Never be categorized as pests! There is something inherently wrong with anyone who would take this point of view. Forca syart considering the fact that Virbac have acknowledged	Description of feral cats p.64 I totally oppose your propositions.	Note	Please note the Proposed Plan made no reference to 'pest cat' or microchipping.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>that microchipping is faulty and there are at least 15000 cats / Pets out here between 2012 and 2017 with faulty chips it is a total disgrace and totally unacceptable that these cats could be killed through lack of a readable microchip!</p> <p>What is wrong with you people? Apart from that , the stray cats already in the community are no different from the domestic cats at the end of your bed . Through no fault of their own they have become stray - largely through irresponsible people! Also the research you are basing this movement on is false and it is a sad situationwhen you allow the likes of Gareth Morgan and the cat haters to be more listened to than Bob Kerridge who for 35 years has been the leader in Animal Welfare in NZ and CEO of the SPCA! This is faulty research funded by cat haters.</p>			
25.66	<p>PFNZ Trust online submission form: Anne Batley-Burton</p>	<p>Managing predators for sustained control - Plan rule 12 p65</p> <p>I do not support the Council. They are ill informed.</p>	<p>I do not support the Council. They are ill informed</p>	<p>Note</p>	
25.67	<p>PFNZ Trust online submission form: Anne Batley-Burton</p>	<p>6.5.1 Feral cats to be managed under site-led programmes p.78</p> <p>Quite frankly you people are no different from Hitler and The Nazis .why should a cat without a microchip suddenly become a pest? Identification - don't worry that's all it is. And then we push you into the gas chambers.</p> <p>Wake up ! These cats are sentient beings and you people are becoming fanatical.</p>	<p>No relief stated</p>		<p>Please refer to No 25.65</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
25.68	PFNZ Trust online submission form: Anne Batley-Burton	6.5 Pest to be managed under site-led programmes p.80 I do not support cats being included as pests! They are the most loved companion animals in the world whether microchipped or not (lost and stray or not) . Nz is fast becoming a joke around the world as KILLERS of defenseless animals in the Name of Conservation!	I do not support cats being included as pests!	Reject	
25.69	PFNZ Trust online submission form: Anne Batley-Burton	6.5 Hedgehogs and mice i do not think hedgehogs and mice should be included as pests!	i do not think hedgehogs and mice should be included as pests!	Reject	
25.70	PFNZ Trust online submission form: Anne Batley-Burton	Wake up NZ! Stop killing in the name of Conservation. And our cats - microchipped or not- are never going to be pests!!!!!!	No relief stated	Note	
26.1	The New Zealand Cat Foundation/ Feline Rights New Zealand	Feline Rights New Zealand strongly opposes the inclusion of 'feral' Cats for sustained control. Cats as the apex predator are valuable assets who contribute to the control of both rodents and mustelids. Remove the apex predator from an ecosystem and this results in what is known as the mesopredator release effect. We append a paper from the Journal of Animal Ecology entitled 'Cats Protecting Birds:	Feline Rights New Zealand strongly opposes the inclusion of 'feral' Cats for sustained control	Reject	Feral cats are declared a pest under the Site-led programme. No reference is made to micro chipping. Companion cats are not declared a pest under this Plan. Feral cats are one component of the predator control programme. The focus is not specifically on cats, but rather as one of the suite of predators, primarily in the rural landscape. As clearly stated in the plan feral cats have been branded as 'the ultimate predators' in

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Monitoring the Mesopredator Release Effect' which covers the scientific perspective in detail. In New Zealand there are documented instances where the removal of Cats from a locality has resulted in a explosion of the rat population which in turn has had a marked adverse impact on birdlife.</p>			<p>New Zealand and have been nominated as among 100 of the "World's Worst" invaders. New Zealand's unique native wildlife is particularly vulnerable to predation by cats. Feral cats kill young and adult birds and occasionally take eggs, prey on native lizards, fish, frogs and large invertebrates. Cats are highly efficient predators, and have been known to cause local extinctions of seabird species on islands around the world. Both sea and land birds are at risk, particularly those that nest or feed on or near to the ground. Feral cats are implicated in a small way in the spread of Bovine Tuberculosis, with the potential to infect cattle. They also carry parasites and toxoplasmosis that cause abortions in sheep and illness in humans. Feral and stray cats can be aggressive towards companion cats. Through fighting they can cause severe injuries, sometimes resulting in euthanasia of companion cats. Stray cats are likely to interbreed with the un-neutered domestic cat population and may spread infectious diseases.</p> <p>A National Cat Management Strategy Group (NCMSG) was formed in November 2014 by eight national organisations to develop a national overarching strategy for responsible, compassionate and humane cat management in New Zealand through a collaborative and proactive approach. The key principles of the strategy are the</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>promotion of responsible cat ownership, humane cat management, and environmental protection. The New Zealand National Cat Management Strategy Discussion Paper released by this group acknowledges the problems associated with cat overpopulation and feral cats. They state they are cognisant that the issue of cat management is complex, and that the interests of all species must be considered. Members of this group included the New Zealand Companion Animal Council, New Zealand Veterinary Association and the Royal New Zealand Society for the Prevention of Cruelty to Animals. For further information please visit the NZ Companion Animal Council website: http://www.nzcac.org.nz/nzcac/nzcac-resources/nzcac-newsletters/7-blog/83-national-cat-management-strategy-discussion-paper</p>
26.2	The New Zealand Cat Foundation/ Feline Rights New Zealand	<p>Feline Rights NZ encourages councils to support public education on good Cat care and one of the main aspects of this is encouraging citizens to de-sex their Cats. We support council subsidies for low income earners to have their Cats de-sexed. A de-sexed Cat is a happier healthier Cat. We encourage councils to support and provide funding for local Cat rescue organisations and those groups who serve Cat colonies. Well</p>	<p>Feline Rights NZ encourages councils to support public education on good Cat care and one of the main aspects of this is encouraging citizens to de-sex their Cats.</p>	<p>Note</p>	<p>Although staff support a cat desexing programme in principle, it is of staff's view that cat regulation and desexing should sit with local authorities as dog control does.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>cared for Cat colonies are less likely to engage in predation on native wildlife and they will defend their territory and prevent the influx of further Cats. Engage in the removal of Cat colonies and one is confronted by what is known as the 'vacuum effect'. What this means is more Cats will move in to where the initial colony once was. We append a document by Alley Cat Allies which covers the matter of the 'vacuum effect'.</p> <p>Predator Free NZ has run a template on their website for the purposes of collective lobbying where they suggests collapsing the legal categories of Cats and redefining both 'feral' and 'stray' Cats under a new arbitrary term 'pest Cats' these being all Cats who do not have a functional microchip which immediately returns an ID when scanned with a microchip scanner.</p> <p>HBRC has no mandate to redefine 'stray' and 'feral' Cats as 'pest Cats', only central government can do that. HBRC has an obligation to follow the definitions of Cats as defined under the Animal Welfare Act 1999 and the associated Companion Cats - Animal Welfare (Companion Cats) Code of Welfare 2007, a code of welfare issued under the Animal Welfare Act 1999.</p>	<p>We encourage councils to support and provide funding for local Cat rescue organisations and those groups who serve Cat colonies.</p>		
26.3	The New Zealand Cat Foundation/				

No.	Name	Submission	Relief	Staff Recommendation	Reasons
	Feline Rights New Zealand	<p>The judiciary presiding over a judicial review would take a very dim view of a regional council acting outside of its mandate and using the arbitrary term 'pest Cat' in official council documentation and legislation to grant itself open season to execute every Cat it can catch. Go down the path of compulsory microchipping, use the microchip ID to determine who lives and who dies and social unrest is an inevitable consequence. The media will have a field day with it and it will not be a good look for either the council as an entity or the councillors themselves.</p> <p>While microchips can be a useful tool in facilitating the return of lost Cats it is well documented that microchips are not infallible. The recent recall of some 15,000 microchips by the supplier Virbac NZ is but one example of microchips failing en masse. We append a copy of Virbac NZ's recall notification. As it is well documented that microchips do fail, if the council chooses to follow the suggestions of Predator Free NZ, it is only a matter of time before the council kills companion Cats and the council finds itself before the court for the mass execution of companion animals.</p> <p>While the minds of some citizens are ensnared by pest-free mass hysteria and others citizens are engaged in emotively defending their companion animals, what we have is a divide and rule scenario. Undoubtedly there is other business going on behind the scenes the hidden wannabe rulers of society are hoping we will not notice. It's the standard methodology of the stage conjurer utilised on a mass scale.</p>	No relief stated but implies lack of support for adding a definition of 'pest cat' in the Plan	Note	<p>The Proposed Plan does not include the definition 'pest cat'.</p> <p>Please note that the definition 'pest cat' was a suggestion made by Predator Free NZ Trust in a submission to Hawke's Bay Regional Council.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>When one sees business terminology such as "private-public partnership" and "management strategy", etc used in a political context, that is a sure sign of the evolution of corporate power into a dangerous political form.</p> <p>The present focus on environmental action at all costs is not about genuine conservation as such. It's a business model, albeit a thoroughly flawed one.</p> <p>Restoration of 'native biodiversity' = more tourism = more revenue, and if it takes a series of pogroms against any and all exotic species including our beloved Feline family members then so be it.</p> <p>A culture that does not grasp the essential interplay between power and true moral values, which mistakes management techniques for wisdom, and fails to understand that compassion and inclusiveness, not profit, is the measure of a civilization, condemns itself to death.</p>			
27	Peter Manson	<p>Very briefly re pampas: It should at least be on the organisms of interest list.</p> <p>I and others consider it to be a biodiversity risk - mainly for wetlands. There are several examples in nhb where identifiable sources on private land are spreading seeds into wetlands. This is presently controllable.</p> <p>The potential problem could occur anywhere from Tutira north and it would be wise for HBRC to provide information to ratepayers so they can recognise the plant as a risk and know how to control it. Ultimately I believe we need a</p>	Pampas should at least be on the organisms of interest list.	Accept	Staff recommend pampas be added to the Plan as an Organism of Interest.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		recommended action plan for conservation site managers and adjacent land owners.			
28	Paddy Maloney	<p>I am aware of several places in the Hawkes Bay Region where we have smaller plots, but some other areas are already quite large plots of pampas. I raised this issue with the Council a few years ago, but to date this plant has not been a priority for your Council's pest control strategy.</p> <p>The worst local areas that I have seen for pampas are in northern Hawkes Bay in the Wairoa, Mahia, Nuhaka area where it is seriously out of control. You may already be familiar with this issue there. If you are not yet aware of it, then I recommend that you drive around the northern Hawkes Bay area to see how prevalent it is, and also how much effort will be required to eradicate it. But if nothing is done it will only get worse.</p> <p>There are lessor plots/outbreaks elsewhere in Hawkes Bay.</p> <p>Some of these are in the Poukawa, Pekapeka/ Paki Paki area (there seems to be an effort to eradicate pampas in this area), in the Clive area in Lawn road and Mill Road where there are hedges of pampas, out in the Waimarama district along Waimarama road, Tiakitai road, Te Apiti road, in Hastings itself alongside Highway 2 and the railway line on the south side of Hastings.</p> <p>These smaller areas are more easily dealt with before they spread to a larger area.</p>	I think it is important to add this pampas plant risk to the Council's control programme	Accept in part	<p>Staff recommend pampas be added to the Plan as an Organism of Interest.</p> <p>Pampas is declared an Unwanted Organism under the National Pest Plant Accord, thus banning it from propagation, sale and distribution.</p> <p>Pampas is widespread across the region and would require significant resources if it was to be actively managed. Council is currently controlling pampas in areas of high conservation value, predominantly wetlands, outside of this Plan. Requiring land occupiers to control pampas would place a significant financial burden on them, with costs of control for some properties likely to be significant.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>When you are looking out for it, pampas seems to be quite common in our region, but is generally not yet out of control – except for the northern Wairoa/ Mahia area.</p> <p>Now that I have drawn your attention to this you will now see it as very common.</p> <p>My recent experience of the problem in the Northland region however made it very obvious what happens when this plant gets out on control.</p> <p>I have attached several photographs from my recent experience in the Northland region which shown how extensive the problem is there. It is most prevalent in cleared forestry areas and on poorly maintained farms, and along the roadsides.</p> <p>The Northland area now covered in pampas would be several hundred, and more likely several thousand hectares of previously productive land. The problem is now so large it will be impossible for the Northland Council to control and eradicate this plant.</p> <p>The cost of eradication will now be well beyond the ability of the Northland council to finance, so for them, the problem will only get worse, and the economic loss will increase as time goes by.</p> <p>The value of productive land now last to pampas in Northland would now be many millions of \$ value. This will be a permanent loss of previously valuable productive land.</p>			

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>The seed from this plant is easily spread by the wind, and it will thrive in Hawkes Bay. This is why it is important to nip this problem in the bud.</p> <p>As with other pest and biosecurity problems it is much better to deal with this at the earliest possible stage, and if not controlled early the problem and the costs will become much greater if it is not dealt with.</p> <p>I think it is important to add this pampas plant risk to the Council's control programme, and therefore seek that this letter be accepted as a late submission by Council.</p>			
29	Mike Healy	<p>Submission on Plant Pests I have viewed the current document and commend the Council on a well-structured document. However, throughout the Plant Pest section, no mention has been made of Moth Plant – <i>araugia hortorum</i> – a weed with origins from South America. I am aware that this weed is well established in parts of the Auckland region and is included in their Pest Management Strategy. It may be more widespread in other parts of New Zealand. Over the past 4-5 years, Moth Plant has become evident and increasingly troublesome in the urban areas of Onekawa/Pirimai (Napier) and may be more widespread than I have observed. My concern is how quickly the spread of this plant can occur and if this proliferation continues, this weed will quickly infect large areas. My concerns are:</p>	<p>I ask that the Council gives urgent consideration to the inclusion Moth Plant into the RPMS currently being considered in order that measures can be made and directed to some form of control for the long term benefit of regional economy.</p>	<p>Accept in part</p>	<p>Mothplant is currently included in the Plan as an Organisms of Interest (Table 3, pg 24).</p> <p>Mothplant is currently distributed across the urban areas in Hawke's Bay, including Napier, Hastings, Havelock North, and Wairoa. Council has been actively controlling any mothplants found in the rural area. Council also undertakes targeted awareness programmes for mothplant during the flowering season, raising awareness of its negative impacts and skin irritant properties of its sap.</p> <p>Council also actively participates in the BioControl Collective (managed by Maanaki Whenua) of which mothplant is being actively researched for a biocontrol agent.</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>1. By not being mentioned in the Council's Regional Pest Management Strategy, the public will be unaware of this weed and as a consequence, could become widespread and devastating to productive rural land and public areas – possibly worse than Oldman's Beard!</p> <p>2. The seeds are spread by the wind (up to 20k) and are a very prolific producer of seeds.</p> <p>3. If the weed is currently contained there is an opportunity to manage further spread and then manage eradication.</p> <p>I ask that the Council gives urgent consideration to the inclusion Moth Plant into the RPMS currently being considered in order that measures can be made and directed to some form of control for the long term benefit of regional economy. I am disappointed that this invasive weed lacks recognition in this and previous RPMS's</p>			Staff will follow any developments on this biological control for this organism.
30.1	Maungaharuru Tangitū Trust	<p>Two key themes have emerged from our analysis of the draft plan:</p> <p>1. Appropriate representation and engagement with Maungaharuru--Tangitū Tangata Whenua as opposed to someone who is Māori. Specifically as a Treaty Partner, HBRC are obligated to engage directly with Maungaharuru--Tangitū Tangata Whenua. Maungaharuru--Tangitū Tangata Whenua are not currently represented in the HBRC Māori Committee and the Regional Planning Committee decisions are not binding on Maungaharuru--Tangitū Trust. Specific and direct engagement is encouraged.</p>	Specific and direct engagement is encouraged with Maungaharuru--Tangitū Trust.	Note	<p>Specifically in relation to consultation with Maori during preparation of the RPMP, Council undertook the following:</p> <p>1. A Biosecurity Working Party, consisting of three councillors and three appointed members of the Regional Planning Committee, was formed and was responsible for considering and recommending to staff advice on the Regional Pest Management Plan review process and key issues. This working party provided guidance on the development of the discussion</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<p>document, Proposed Plan and advice on how to best consult with Māori.</p> <p>2. The Biosecurity team presented both the discussion document and the Proposed Plan to the Māori Committee, updating them on key items of interest and process of engagement.</p> <p>3. Three emails were sent specifically to the Regional Policy Committee, Māori Committee and Post Settlement Government Entities, one advertising the release of the discussion document for public consultation, one offering to meet with interested parties in person to discuss the Regional Pest Management Plan review and a final email advertising the release of the Proposed Plan for public consultation.</p> <p>4. This third email resulted in interest in the Proposed Plan and as a result a hui was held at Peak House, Te Mata Peak on 5 March of which HBRC staff attended and presented at. This hui was organised by Tangata Whenua Hawke's Bay.</p> <p>In response to other submissions, staff recommend that Section 2.5 Relationship with Māori be amended to include a</p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					commitment to work closer with Tangata Whenua including engagement (please refer No. 30.2 below).
30.2	Maungaharuru Tangitū Trust	2. How will the plan address the affects of pests on our cultural values? This is not clear, the effects are not clear and therefore the remedies or actions are not clear eg, Kaitiakitanga, Wāhi Taonga, Wai Māori and Rongoā.	How will the plan address the affects of pests on our cultural values?	Note	<p>Section 2.5 discusses the relationship with Māori. Further information on impacts of specific pests on cultural values is contained within the Cost Benefit Analysis and Cost Allocation Report.</p> <p>Staff see great value in in building closer working partnerships with tangata whenua. Staff are recommending Council commits to undertaking this process over the duration of the Plan through amending <i>Section 2.5 Relationship with Māori</i>, inserting the following statement:</p> <p><i>Over the duration of this plan, Council will seek to build a stronger relationship with tangata whenua and build on how this plan can better achieve their goals and aspirations for pest management. Māori involvement in biosecurity is an important part of exercising kaitiakitanga. Pest management will play an important role in protecting wāhi tapu and taonga, restoring the mauri of whenua and wai māori, and enhancing the well-being of local communities. Successful pest management is holistic in nature and recognises the interconnectedness of people and the environment. To achieve these outcomes for</i></p>

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					<i>the rohe, all must work together. Council will seek engagement from tangata whenua in holding conversations on what this will look like. Work programmes to be undertaken that will assist with this relationship building and link to this plan are the development of a cultural framework and survey of taonga sites through the Biodiversity Action Plan, the development of a Predator Free Hawke's Bay initiative, growing the Cape to City and Poutiri Ao ō Tāne projects.</i>
30.3	Maungaharuru Tangitū Trust	<p>2.1 Strategic Background</p> <ul style="list-style-type: none"> The proposer paragraph does not state your regulatory obligations with regard to bio security and pest management. This could be alluded to at this earliest point as opposed to later in the plan. 	No decision requested, but implies that the proposer should state regulatory obligations	Note	The Proposer is designed to give the reader a high level overview of previous plans and the direction council is heading in. The following heading 1.2 Purpose outlines the purpose of the Plan and Councils role under the Biosecurity Act.
30.4	Maungaharuru Tangitū Trust	<ul style="list-style-type: none"> Does not state your obligation to Tangata Whenua in making decisions. This is further reflected in figure 2. 	No relief sought	Note	This is discussed in Section 2.5 <i>Relationship with Māori</i> .
30.5	Maungaharuru Tangitū Trust	<ul style="list-style-type: none"> Can you please highlight how pest management impacts 'cultural values' when considering the strategic background to the strategy and how the HBRC and this plan intends to avoid such impacts. 	Highlight how pest management impacts 'cultural values' when considering the strategic background to the strategy and how the HBRC and this plan	Note	Cultural values are discussed in Section 2.5 of the Plan and in the Cost Benefit Analysis and Cost Allocation Report. Pest management can have negative impacts on a range of values, including cultural, such as the use of 1080 or biocontrol agents. It is not the role of the plan however to state what tools are to be used in any or every

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			intends to avoid such impacts		particular operational activity. It sets out what pests are to be controlled. Control tools used are decided on a case by case basis outside this Plan.
30.6	Maungaharuru Tangitū Trust	<ul style="list-style-type: none"> How do the complementary plans complement the strategy, what plans are these? Can you add a thematic schemea to contextualize. 	Add a thematic schemea to contextualize	Reject	Please refer to Section 2.1 through to 2.5 and Figures 2 to 5 within the Plan.
30.7	Maungaharuru Tangitū Trust	<p>2.1.1</p> <ul style="list-style-type: none"> Do Tangata Whenua not feature in the partnership? <p>The framework contradicts earlier paragraphs aformentioned where Tangata Whenua are not considered part of the partnership. It is important that this is recognised throughout the plan.</p>	No relief stated	Note	Relationship with Māori is covered in Section 2.5.
30.8	Maungaharuru Tangitū Trust	<p>2.1.2</p> <ul style="list-style-type: none"> How does the framework and the HBRC intend to protect 'cultural values' of Maungaharuru--Tangitū from pest threats? 	No relief stated	Note	Please refer to No. 30.2 and No. 30.5
30.9	Maungaharuru Tangitū Trust	<ul style="list-style-type: none"> Figure 4 again fails to recognise and provide for Tangata Whenua as per the RMA. 	No relief stated	Note	Please note this Plan was produced under the Biosecurity Act 1993, not the RMA.
30.10	Maungaharuru Tangitū Trust	<p>2.2 Legislative Background</p> <p>2.2.1 Bio Securities Act</p> <ul style="list-style-type: none"> Part 5; How will the plan enable, recognise and provide Maungaharuru--Tangitū, our 	No relief sought	Note	Please refer to No. 30.2 and No. 30.5

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		Kaitiakitanga and our Taonga? Can you please state the actions that are intended to achieve this.			
30.11	Maungaharuru Tangitū Trust	<p>2.2.2 Resource Management Act</p> <ul style="list-style-type: none"> The plan fails to recognise the specific Parts of the Act where the HBRC is obligated to provide and recognise for Tangata Whenua values, namely Maungaharuru--Tangitū Trust. 	No relief sought	Note	Please note this Plan was produced under the Biosecurity Act 1993, not the RMA. Section 2.2.2 of the RPMP is intended as a brief overview of the RMA's relevance to the RPMP. Section 2.2.2 is not intended as to fully describe the RMA and its numerous requirements for plans and policy statements under that Act.
30.12	Maungaharuru Tangitū Trust	<p>2.2.3 Local Government Act</p> <ul style="list-style-type: none"> This is the Act on which the HBRC is based and perhaps could be the leading paragraph regarding legislative background paragraph. 	No relief sought	Note	Please refer to Section 2.2.3 and Figure 5
30.13	Maungaharuru Tangitū Trust	<ul style="list-style-type: none"> This Act also places obligations on the HBRC to enable participation of Tangata Whenua in decision making. How will the HBRC enable MTT to do so? To date, this has been poor, the Maori Committee does not represent the interest of MTT and the Regional Planning Committee decisions are not binding on MTT. HBRC are obligated to ensure that they specifically engage with MTT. 	No relief sought	Note	Please refer to No. 30.2
30.14	Maungaharuru Tangitū Trust	<p>General Legislation</p> <ul style="list-style-type: none"> The responsibilities and obligations of HBRC are not clearly articulated. Where is the accountability for the Council? 	No relief sought	Note	As stated in the plan, Council is proposed to be the management agency responsible for implementing the Plan. Please refer to Section 1.1 <i>Proposer</i> , Section 1.2 <i>Purpose</i> ,

No.	Name	Submission	Relief	Staff Recommendation	Reasons
					Section 3.1 <i>The management agency</i> and Section 7 <i>Monitoring</i> within the Plan.
30.15	Maungaharuru Tangitū Trust	<p>2.3.6 – Te Mana Whakahono</p> <ul style="list-style-type: none"> • Consideration needs to be given either in this section or one earlier for the plans of Hapū as established in the review of the RMA. 	Consideration needs to be given either in this section or one earlier for the plans of Hapū as established in the review of the RMA.	Reject	Staff acknowledge the synergies of hapū plans and pest management. Mana Whakahono a Rohe arrangements are a tool under the RMA and have no statutory basis under Biosecurity Act. Consideration of hapū plans will be given outside of this Plan.
30.16	Maungaharuru Tangitū Trust	<p>2.5 Relationship with Māori</p> <ul style="list-style-type: none"> • The sentence stating that TW carry out significant pest management due to our primary sector economic interests is limiting. Our interests are broader than primary sector and economic and are primarily based on our cultural values as a priority over primary sector and economic. 	No relief stated	Note	<p>Staff suggest Section 2.5 could be amended but some suggested wording would be appreciated. The following sentence is one possible option:</p> <p><i>Tangata whenua carry out significant pest management. Although this pest management helps protects their primary sector economic interests, the driver is primarily based on cultural values.</i></p>
30.17	Maungaharuru Tangitū Trust	<p>Māori Committee</p> <ul style="list-style-type: none"> • The statements here are incorrect in that this committee does not represent Maungaharuru--Tangitū Tangata Whenua therefore does not meet the Council's obligations under the Treaty and other respective Acts. This statement needs to be rectified. 	This committee does not represent Maungaharuru-- Tangitū Tangata Whenua therefore does not meet the Council's obligations under the Treaty and other respective Acts. This statement needs to be rectified.	Reject	The Plan does not refer to the Māori Committee as representing Maungaharuru--Tangitū tangata whenua nor does it state this process meets all Council obligations under the relevant legislation.

No.	Name	Submission	Relief	Staff Recommendation	Reasons
30.18	Maungaharuru Tangitū Trust	<p>2.6 Consultation Overview</p> <ul style="list-style-type: none"> • Direct consultation has not occurred with Maungaharuru--Tangitū Trust. As a Treaty Partner ,the expectation is that HBRC will engage directly on all matters and enable such participation as per the respective Acts aforementioned. 	As a Treaty Partner ,the expectation is that HBRC will engage directly on all matters and enable such participation as per the respective Acts aforementioned.	Accept in part	Please refer No. 45.1 and No. 30.2
30.19	Maungaharuru Tangitū Trust	<p>3.3.3 – Post Settlement governance Entities</p> <ul style="list-style-type: none"> • A paragraph stating the role that PSGE entities have could be placed here and move the Territory authroities to 3.3.4. this should include consideration to the Legislative Acts of each settlement, the Statements of Association and Wahi Taonga. 	A paragraph stating the role that PSGE entities have could be placed here and move the Territory authroities to 3.3.4	Accept in part	<p>Staff recommend the following wording be included in Section 2.5 <i>Relationship with Māori</i>:</p> <p>Deed of Commitment <i>Council has a Deed of Commitment with recognised groups with tangata whenua interests in the Hawke’s Bay region which have been mandated to negotiate a comprehensive settlement of their respective historical Treaty of Waitangi claims. It states “that The tangata whenua of Hawke’s Bay and the HBRC care deeply about Hawke’s Bay and its environment. We all have responsibilities around the management of resources that we believe are best met by working together”.</i></p>
30.20	Maungaharuru Tangitū Trust	<p>3.3 , Funding</p> <p>Funding consideration should be given the Tangata Whenua engagement and action in the plan.</p>	Funding consideration should be given the Tangata Whenua	Note	Funding support and resourcing decisions are beyond the scope of the RPMP. These funding decisions are made via Council’s

No.	Name	Submission	Relief	Staff Recommendation	Reasons
			engagement and action in the plan.		Annual Plan and Long Term Plan decision-making processes. Please refer No. 30.2.
30.21	Maungaharuru Tangitū Trust	<p>3.4 Iwi, Hapū relationships</p> <ul style="list-style-type: none"> • Maungaharuru--Tangitū support the increased participation of Iwi and Hapū in the plan. The onus is on HBRC to ensure that you are engaging, consulting with the appropriate manadated Tangata Whenua, not any Māori. • Maungaharuru--Tangitū support the inclusion of a policy to ensure that engagement is undertaken from the OUTSET of considered pest management in the takiwā of MTT. • Enabling Maungaharuru--Tangitū Tangata Whenua to participate in pest control and management decisions and management. This an example of Maungaharuru--Tangitū Tangata Whenua enacting kaitiakitanga in the form of governance, management and pest control. • It will be beneficial for the HBRC to understand the aspirations of Maungaharuru--Tangitū Tangata Whenua with regard pest management. This may be achieved through some dual planning and operations within our Takiwā. 	No relief stated	Note	Please refer No. 30.2.
31.1	Mike Lusk	I note that purple ragwort, Senecio elegant is included in the list of plants which may become a	No relief stated		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		problem. I wonder if in fact you mean to have pink ragwort, <i>S. Glastifolius</i> in the list instead. It is certainly becoming a problem in some parts of Hawkes Bay, growing well in dunes and very dry areas such as cliffs.		Note	Staff recommend Pink ragwort, <i>S. Glastifolius</i> , be added to the Plan as an Organism of Interest.
31.2	Mike Lusk	I believe that <i>Echium vulgare</i> and <i>E. plantagineum</i> will also become a widespread and problematic weeds locally-indeed one or other or both are becoming very visible along rural roadsides. There is now active one of the biological controls introduced to Australia many years ago (a leaf mining moth) and there is some damage showing upon plants on Te Mata Peak and in my garden.	No relief stated	Note	
32	Pete Shaw	Currently there are private owners of large tracts of native forest within the hinterland of Hawke's Bay that are wanting to implement pest control plans that would reduce possum numbers down to very low numbers. These properties are bounded by large tracts of Maori land, some of which have been managed pro-actively and have shown great resolve in reducing possum numbers to low levels. Tatarakaia is an exception. Despite coming under a Nga Whenua Rahui Covenant, requiring pest control, the owners have resisted broadscale possum control. This is both a ticking time-bomb for adjoining landowners and also a huge compromise to any possum control for any adjoining lanowners.:	That HBRC take a lead role in enforcing the good neighbour rule in terms of possum control, with an EMPHASIS upon large tracts of land bordered by properties which are proactive in possum control.	Note	
33	Hawke's Bay Regional Council	Yellow Bristle Grass - page 32: Part 6.1.6 Exclusion	Recommendation		

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>Yellow bristle grass is an aggressive annual plant that spreads through pasture, reducing pasture quality in late summer and autumn. It primarily impacts milk and stock finishing producers. It is difficult to identify when not seeding as it is very similar in appearance to other bristle grasses present in New Zealand. It is currently widespread throughout Taranaki, Waikato, South Auckland and Bay of Plenty. Control tools are limited, as herbicides also negatively impact desired pastures. It is currently designated as an exclusion pest in Hawke's Bay Regional Pest Management Plan. The objective of this programme (pg 33) is to exclude the establishment of yellow bristle grass within the land of the Hawke's Bay region in order to protect the region's economic well-being. For this objective to be met, yellow bristle grass cannot currently be established in the Hawke's Bay region.</p> <p>Unfortunately staff recently discovered a population of yellow bristle grass in northern Hawkes Bay, primarily growing along roadside margins. It was confirmed as yellow bristle grass by the Plant Identification Service at Landcare Research on 27 March 2018. HBRC Pest Plant staff are currently undertaking a roadside delimitation survey with the current known distribution shown in map 1 below. Approximately 90% of this roadside delimitation area has been surveyed.</p> <p>Yellow bristle grass has multiple vectors, primarily being mowers, machinery and stock. Its seeds can survive passage through the rumen and be deposited and establish in dung. It appears the</p>	<p>Move yellow bristle grass from Eradication to Sustained Control</p>	<p>Accept</p>	

No.	Name	Submission	Relief	Staff Recommendation	Reasons
		<p>main vector for the spread of the population of yellow bristle grass in northern Hawke’s Bay is roadside mowers. Although the source of this incursion is unknown, yellow bristle grass is known to be present in the Gisborne Region. HBRC Pest Plant staff are in conversations with Wairoa District Council, New Zealand Transport Authority and private land owners to manage current risk pathways, primarily focusing on roadside mowers and machinery. Staff are also preparing an information package that will go out to adjacent land owners of known yellow bristle grass populations. It will contain information on its impact, biosecurity measures to mitigate spreading the pest, and options for control. Staff will continue to undertake delimitation surveys and design an annual awareness campaign to run during the high risk seeding period (December – March).</p> <p>Given the current extent, number of potential vectors and limited control tools, staff believe eradication is not achievable. Eradication has not been attempted in any other region to date. However, powers under the Biosecurity Act are still required to manage this pest, particularly for vector management. It is proposed that yellow bristle grass is moved to Sustained Control with council’s main focus being on preventing its spread and assisting the community in best practice management.</p>			