



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

Date: Thursday 11 July 2024
Time: 9:30am - RPMP Deliberations
Meeting Room: Tasman Council Chamber
Venue: 189 Queen Street, Richmond
Zoom conference link: <https://us02web.zoom.us/j/89919078066?pwd=FPeajTWb2ARzUv6tH2RN5qVIEbRmo.1>
Meeting ID: 899 1907 8066
Meeting Passcode: 792444

Regional Pest Management Joint Committee

Deliberations AGENDA

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

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

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AGENDA

- 1 OPENING, WELCOME, KARAKIA
- 2 APOLOGIES AND LEAVE OF ABSENCE

Recommendation

That apologies be accepted.

- 3 DECLARATIONS OF INTEREST
- 4 LATE ITEMS
- 5 CONFIRMATION OF [MINUTES](#)

That the minutes of the Regional Pest Management Joint Committee Hearing meeting held on Monday, 27 May 2024, be confirmed as a true and correct record of the meeting.

- 6 REPORTS
 - 7.1 Deliberations report on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029..... 3
- 7 CONFIDENTIAL SESSION

Nil
- 8 CLOSING KARAKIA

7 REPORTS

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

Report To:	Regional Pest Management Joint Committee
Meeting Date:	11 July 2024
Report Author:	Guinevere Coleman, Team Leader Biosecurity & Biodiversity
Report Authorisers:	Rob Smith, Environmental Information Manager; Kim Drummond, Group Manager - Environmental Assurance
Report Number:	RRPMC24-07-1

1. Purpose of Report

1.1 The purpose of this report is to:

- 1.1.1 provide a summary of the submissions received on partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029 (RPMP) (the Proposal), supporting information, and concurrent consultations;
- 1.1.2 provide the Regional Pest Management Joint Committee (the Committee) with an opportunity to discuss and obtain advice from staff on proposed changes raised in the submissions;
- 1.1.3 seek decisions on the proposed changes from the partial review process that are to be included in the 2019-2029 RPMP.

1.2 This report is structured to discuss each proposed change separately. Most submitters commented on more than one proposal, so their submissions are split into the appropriate sections

2. Report Summary

2.1 The Regional Pest Management Joint Committee is responsible for the development and review of the Tasman Nelson Regional Pest Management Plan 2019-2029 (RPMP), a joint RPMP between Tasman District Council and Nelson City Council.

2.2 This partial review is considering changes to the RPMP, with new organisms proposed to be added and rule changes to other organisms already named as pests, related to:

- Blue passionflower
- Boneseed
- Moth plant
- Pampas
- Sabella
- Vietnamese Parsley
- Water Celery
- Pest conifers, including wilding conifers
- Feral and stray cats

- 2.3 The proposed rule changes were approved by the Committee to go out for public consultation in December 2023. Consultation ran for one month in February 2024. 101 submissions were received, and 12 submitters spoke in hearings on Monday 27 May 2024.
- 2.4 This deliberations report presents revised changes to the Proposal in response to the submissions.
- 2.5 Submissions were overall supportive of the proposed changes. No changes to the Proposal are advised for blue passionflower, boneseed, pampas, moth plant, water celery and Vietnamese parsley.
- 2.6 In response to submissions, changes are recommended for Wilding/pest conifer, cat and sabella rules. A marked-up version of the relevant sections of the Proposal is provided for the Committee to consider and approve.
- 2.7 Next steps will take the finalised Proposal to both Tasman District Council and Nelson City Council full Council meetings for adoption.

3. Recommendations

That the Regional Pest Management Joint Committee

- 1. Receives the Deliberations report on the partial review of the Tasman Nelson Regional Pest Management Plan 2019-2029 RRPC24-07-1; and**
- 2. Receives the Feral and stray cat provisions for the Tasman Nelson Partial Regional Pest Management Plan 2019-2029 Review Revision in response to submissions and hearings (marked-up version) (Attachment 1 to the agenda report); and**
- 3. Receives the Wilding/pest conifer provisions for the Tasman Nelson Regional Pest Management Plan 2019-2029 Partial Review Revisions in response to submissions and hearings (marked-up version) (Attachment 2 to the agenda report); and**
- 4. Receives the summary of submissions with staff recommendations for the Tasman Nelson Regional Pest Management Plan 2019-2029 (Attachment 3 to the agenda report); and**
- 5. Acknowledges the late submission to the Tasman Nelson Regional Pest Management Plan 2019-2029 received from Project De-vine Environmental Trust on 23 April 2024; and**
- 6. Approves the proposed rules as written in the Tasman Nelson Regional Pest Management Plan 2019-2029 Proposal document for blue passionflower, boneseed, moth plant, pampas, water celery and Vietnamese parsley; and**
- 7. Approves the proposed changes to the Tasman Nelson Regional Pest Management Plan 2019-2029 rules for feral and stray cats in Nelson City, Abel Tasman National Park enclaves and the St Arnaud environs to:**
 - a. Clarify the rationale for inclusion section to include the complete list of proposed changes in all site-led programmes.**
 - b. Edit description and adverse effects to clarify feral and stray cats come from reproduction and illegally released companion cats; and impact of toxoplasmosis on native wildlife.**
 - c. Amend the Nelson City specific rule (a) from “must report to “shall report”.**

- d. Amend the explanation of the rules (a) to clarify that reported sightings will be recorded and used to consider management needs at site.
 - e. Amend the Nelson City rule that no person shall deliberately release into the wild *any cat, including a companion cat*.
 - f. Amend the St Arnaud specific rule from “must report to “shall report” and include explanation that reports will be recorded and used for considering management at the site.
 - g. Amend St Arnaud rule (b) to No person shall deliberately release into the wild (into the Nelson Lakes National Park and environs) *any cat, including a companion cat*.
 - h. Amend the Abel Tasman site-led rule to include (b) No person shall deliberately release into the wild (into the Abel Tasman National Park and private enclaves) *any cat, including a companion cat*. This is a specific pest agent cat rule for the Abel Tasman National Park and enclaves site-led programme; and
8. Approves the inclusion of Bell Island into the Waimea Inlet site-led programme for feral cats; and
9. Approves the proposed changes to the Tasman-Nelson Regional Pest Management Plan 2019-2029 rules for pest conifers, which also include wilding conifers to:
- a. Amend “Pest Conifer and Wilding conifers” to “Pest Conifers” and amend the category to refer to “subjects”. Ten individual species are designated pests in any regional situation while the wilding conifer sub-class of subjects covers two species, and their pest designations apply only when they occur in wilding states.
 - b. Amend definition of wilding conifers to be ‘self-seeded’ rather than natural.
 - c. Amend definition of pest conifers to recognise that some species have commercial worth, as while an unwanted organism, *contorta* can have economic value in some circumstances.
 - d. Amend definition of pest conifers to:
 - i. Radiata pine and Douglas fir are commercially grown in the region. The Tasman-Nelson Regional Pest Management Plan 2019-2029 is not concerned with preventing production or permanent forestry operating within an occupier’s private property. However, plantations of these species may result in self-seeded and unintentional spread, hence self-seeded trees of these two species, outside of existing forest plantations, are deemed to be ‘wilding conifers’¹.
 - e. Amend definition of pest agent conifers to:
 - i. ‘Pest agent conifer’ - means any introduced conifer (that is not otherwise specified as a pest within the Tasman-Nelson Regional Pest Management Plan 2019-2029) that is capable of helping the spread of wilding conifers and is not located within a forest plantation (e.g. a shelter belt of Douglas fir under 1 ha. in an area that is clearly exacerbating seed spread issues for a neighbouring property).

¹ Douglas fir seed spreads long distances and creates a greater seed spread risk than *P. radiata*.

f. Amend adverse effects of pest conifers to:

- i. Wilding conifers cause significant impacts on native ecosystems in the Tasman-Nelson region, such as invading iconic tussock grasslands, alpine herblands and (in particular) the ultramafic areas of Dun Mountain and the Red Hills.**
- ii. National analysis of trends indicates that wilding conifers can outcompete native species in regenerating scrub for space, water and nutrients, adversely affect recreational and visual/landscape values, alter soil and soil fauna, reduce pastoral farming availability, reduce water availability (for irrigation and hydro power generation) and may help create or contribute to wildfire risks.**
- iii. All these impacts are also likely to adversely affect tāngata whenua values across Te Tau Ihu. Some adverse effects may be exacerbated by the potential impacts of climate change (e.g. more frequent or intense drought/dry conditions which could make some catchments more prone to flow sensitivity). Having increasing infestations of wilding conifers may lead to increased uptake of available water in vulnerable catchments.**

g. Amend the “Rationale for inclusion” to:

- i. Pest and wilding conifers are included for the first time in the Tasman-Nelson Regional Pest Management Plan 2019-2029 to help manage their spread more effectively². A key objective is operationally focused - to maintain the gains of prior and current control efforts in four designated operational areas.**
- ii. The general approach (including regulation) aligns with Marlborough District Council and Environment Canterbury pest conifer policies and is practical and adaptable while advocating for negotiated agreements between parties as an alternative to enforcing rules (where the result may achieve the same or similar outcomes as rules).**
- iii. Equally, there are two strategic objectives to support their inclusion:**

Firstly, to help stop further spread and protect land in Tasman-Nelson that has not been impacted by pest conifers to date (or to control infestations that are just becoming noticeable). History has shown that an important contributor to pest conifer spread problems is a lack of early action, and that the cost of control increases significantly the longer spread is left uncontrolled.

Secondly, the inclusion of wilding radiata pine and wilding Douglas fir is intended to address the negative effects of wild dispersal of these species from planted situations such as plantation forests, hedgerows, and specimen trees. The intention is to enhance the existing obligation

² Their inclusion now also provides a lead in for a full review in 2028/29 when the whole operative RPMP requires reviewing.

on the forestry industry to manage seed dispersal effects as part of that sectors' social licence to operate in Tasman-Nelson.

- h. Amend the rationale for inclusion to include: The development of appropriate rules to support these objectives is important - (1) to help prevent new areas of pest conifers becoming established due to a lack of proactive action; and (2) land occupiers neighbouring onto forest plantations should not be liable for, or have to undertake pest control on their land through, the spread of self-seeded conifers from forest plantations.
- i. Amend Plan rules and inclusions to clarify the 'Pest Conifer' programme, which is divided into two sub programmes: Nelson-Tasman wide; and within four specific Operational Areas.
- j. Amend Region-wide programme explanation to clarify the clear land rule, the planted forest (wilding spread) rule, and the pest agent conifer rule.
- k. Amend Rule (a) to:

Occupiers must destroy all pest conifers present on land they occupy, unless the land they occupy falls within a named pest conifer operational area (as shown in *Maps*), urban areas or areas of high intensity land use (as determined by an Authorised Person), or unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

- l. Amend Rule (b) to:

From 1 July 2024, occupiers of forest plantations (greater than 1 hectare), outside of named pest conifer operational areas, are liable for the costs of removal of any new wilding conifers present (i.e. subsequently occurring) on adjoining land (where that land is clear of any infestation of wilding conifers as of 30 June 2024). This requirement is limited to adjoining land within 200m of the forest plantation property's boundary and the adjoining occupier must be taking reasonable steps to control wilding conifers elsewhere on the property. This obligation will be on written direction from an authorised person, following a complaint from an adjoining affected neighbour, and where there is evidence that wilding spread has occurred from the planted forest to an adjoining property. A negotiated agreement between the Management Agency and the two occupier parties is an alternative way to achieve this agreement.

Reasonable steps: means an occupier is proactively managing wilding conifers and using approaches, methods and tools advocated in the National Programme's Best Practice Guidelines for managing wilding conifers.

Evidence of spread includes (but is not limited to):

- That the wilding conifers are the same species as those in the forest plantation.
- That the source forest plantation trees were of cone-bearing age on 1 July 2024, and
- There are no other likely seed sources located on the adjoining land or other neighbouring land.

m. Amend rule (c) to:

Occupiers must destroy any pest agent conifer on their land, on direction of an authorised person, where an adjoining occupier is undertaking proactive wilding conifer control on their land and that evidence of wilding spread is clearly attributable to the pest agent conifer(s), or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

n. Amend the current operational Areas under management to clarify the need for the area to be under the National Wilding Conifer Control Programme and that the property is in a state of transition be managed by land occupiers into the future.

o. Amend Current Operational areas under management to reflect sub programme naming change with two rules: A maintain the gains rule; and a Good Neighbour rule.

p. Amend rule (d) to:

Occupiers must destroy any pest conifers on their land where the property is located within one of the four named operational areas that has received prior control, or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement. This rule does not imply any obligations on occupiers of planted forests of species not listed as pest conifers and does not apply until a property has received initial and maintenance control, as described above.

q. Amend rule (e) to:

Occupiers within any of the four named operational areas must destroy any pest conifers on their land within 200m of an adjoining property boundary, where the adjoining property has previously been cleared of pest conifers through prior control and the adjoining occupier is also taking reasonable steps to control pest conifers within 200m of their property boundary. This is a Good Neighbour Rule (GNR) and will apply unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

r. Amend Explanation of the rules to rule (a) to:

Rule (a) places a general obligation on relevant occupiers to remove any pest conifer to prevent new infestations occurring. The principal objective is to provide the Management Agency with powers allowing it to focus on land which is ostensibly clear of wilding conifers to remain clear. Although the majority of wilding conifer spread is predictable, a characteristic of spread (particularly in highly susceptible areas) is also the occurrence of random, irregular, long distance spread into areas previously unaffected. This rule provides an early intervention trigger for vulnerable or susceptible areas. Exemptions may be sought under s. 78(2) of the Act (e.g. for protected 'specimen' conifer trees named in District Plans made under the Resource Management Act).

s. Amend Explanation of the rules to rule (b) to:

Rule (b) aims to ensure that forestry occupiers (of both plantation and permanent forests) are liable for (to pay and/or control) any new wilding spread of conifer seedlings from their forests onto immediately neighbouring land, from 1 July 2024 onwards, with the proviso that the land adjoining the planted forest was free of wilding conifers at this date. It is unreasonable for affected occupiers adjoining planted forests to have to clear wildings and/or pay for this control work (i.e. the ‘exacerbator pays’ principle). Implementation of this rule is based on the opinion of an appropriate council officer and must be backed with proof of spread occurring. The rule only applies where the adjoining occupier (making the complaint) is making reasonable attempts to keep their land clear of wilding conifers.

A four-step process is followed to enact the rule:

- Step 1: Complaint received by council.**
- Step 2: Complaint investigated by an appropriate Authorised Person (with powers of entry) to validate complaint.**
- Step 3: Meeting held between the parties to engage with them and to reach a negotiated agreement.**
- Step 4: If no agreement can be reached, Tasman Nelson Regional Pest Management Plan enforcement provisions may be enacted.**

t. Amend Explanation of the rules to rule (c) to:

Rule (c) is a ‘pest agent conifer rule’ which aims to prevent wilding conifer establishment across property boundaries principally through the control of conifer woodlots and shelterbelts (under 1 hectare in size) or individual trees that are determined, in the opinion of an authorised person, to be genuine sources of seed spread. The same ‘evidence’ criteria from rule b applies. This rule is triggered by a complaint made by a neighbour to the Management Agency, and that person must be taking reasonable steps to control pest/wilding conifers on their property. ‘Reasonable steps’ definition from rule b also applies.

u. Amend Explanation of the rules to rule (d) to:

Rule (d) is about ‘maintaining the gains’ of prior control work to ensure that the benefits of this control are not lost through inaction (or for any other reason) by any occupier. ‘Prior’ means any work underway from 1 January 2016 (when the national programme commenced) to the present day. ‘Control’ means any work funded all or in part through formalised or planned programmes (e.g. national, regional or local operations including environmental trust led initiatives, and as deemed valid by the Management Agency). This definition extends to include individual private property control programmes, on a case by case basis. ‘On their land’ refers to any property located within one of the mapped operational areas, provided there has been control undertaken on that property. The obligation applies anywhere on that property (hence a property wide obligation).

v. Amend Explanation of the rules to rule (e) to:

Rule (e) is a ‘good neighbour rule’ designed to protect an occupier who has been taking reasonable steps (e.g. control work using best practice) on their property and is being impacted by pest conifer infestations on a neighbouring property (e.g. through inaction or unsatisfactory/incomplete control). The 200m distance

is based on science that notes the majority of conifer seeds fall within this space from source trees. In practicable terms this is the only way to bind the Crown to meet its Tasman Nelson Regional Pest Management Plan obligations, however the GNR is not limited in only applying to Crown land. A GNR generally seeks to manage the externality impacts arising from pests spilling over from one property to a neighbouring property that is free of, or being cleared of that pest.

- 10. Approves the proposed changes to the rule explanation for sabella.
 - a. In relation to rule (a), extend the exemption for vessels normally moored in Nelson-Tasman and leaving the region for short periods from 24 hours to three (3) calendar days; and****
- 11. Agrees that staff give effect to the recommendations referred to in Resolutions 6, 7, 8, and 9 when preparing the amended Tasman Nelson regional Pest Management Plan 2019-2029; and**
- 12. Agrees that the amended Tasman Nelson regional Pest Management Plan 2019-2029 and the Deliberations report be presented to both Councils for consideration; and**
- 13. Recommends to the Nelson City and Tasman District Councils that the amended Tasman Nelson Regional Pest Management Plan 2019-2029 be adopted, subject to the same agreement by the other Council.**

4. Background and Discussion

- 4.1 The Regional Pest Management Joint Committee is responsible for the development and review of the Tasman Nelson Regional Pest Management Plan 2019-2029 (RPMP), a joint RPMP between Tasman District Council and Nelson City Council.
- 4.2 Under the Biosecurity Act 1993, a partial review of RPMP's can be undertaken at any time, and if the changes are deemed significant must go through appropriate consultation.
- 4.3 This partial review is considering changes to the RPMP with new organisms to be added and rule changes to other organisms already named as pests, related to:
 - 4.3.1 Blue passionflower
 - 4.3.2 Boneseed
 - 4.3.3 Moth plant
 - 4.3.4 Pampas
 - 4.3.5 Sabella
 - 4.3.6 Vietnamese parsley
 - 4.3.7 Water celery
 - 4.3.8 Pest conifers, including wilding conifers
 - 4.3.9 Feral and stray cats
- 4.4 A number of key stakeholders were included in early consultation at the request of the Joint Committee. These included government agencies, adjoining Councils, sector groups and companies, and community organisations. Feedback from this early consultation helped form the Partial Review Proposal that went to public consultation. These groups were invited to further engage in the public submission process.
- 4.5 At its Tuesday 22 August 2023 meeting, the Regional Pest Management Joint Committee resolved to recommend the draft partial review proposal to both Tasman District and Nelson City Councils for approval to notify.
- 4.6 At its Friday 8 December 2023 meeting, the Regional Pest Management Joint Committee recommended to Tasman District Council and Nelson City Council that they approve public notification of the draft Regional Pest Management Plan 2019 – 2029 Partial Review Consultation document for the partial review of the Tasman–Nelson Regional Pest Management Plan 2019-2029, commencing 23 February 2024, for a period of one month, closing on 23 March 2024.
- 4.7 Tasman District Council and Nelson City Council approved public notification of the partial review consultation document in December 2023.
- 4.8 The consultation period was open for one month and closed on 23 March 2024. We received 101 submissions on the partial review via the Shape Tasman submission form, and 10 full written submissions. We received one late submission from Project De-Vine Environmental Trust.
- 4.9 Forty four submitters requested to speak to their submission. Of these, 12 submitters spoke at the hearings on Monday May 27 2024.
- 4.10 Subsequent to the hearings, staff have reviewed submissions and made relevant changes to the proposed changes for pest conifers, feral and stray cats, and sabella in response. Given the complexities of some of the changes, the relevant sections of the Proposal with marked-

up proposed changes are provided for feral and stray cats (Attachment 1) and pest conifers (Attachment 2).

- 4.11 Where maps are required to illustrate rule boundaries the proposed changes currently refer to “*map*”. These specific references will be updated once the full RPMP is edited to include the new rules and maps re-ordered and finalised.

General Feedback

- 4.12 Generally, the RPMP partial review proposed changes were well supported. Submitters requested consideration be given to good education around identification and control; improved funding through the Long Term Plan (LTP), other species that were posing a problem in the district (Old Mans Beard); and a recognition that tackling pest plants early was important. Several submissions requested Site Led Programmes or extensions to new ones which is outside of the scope of this review but have been noted for consideration for the future full review.
- 4.13 A summary count of submissions supporting or opposing the management of each of the subject pests presented in the proposed limited review of the Tasman and Nelson Regional Pest Management Plan is presented in the below table. Not all submitters indicated outright support or opposition. Where this is the case, we have taken the sentiment expressed in the submission as either being supportive of the proposal or not.

Subject Pest	Total # Submissions regarding pest	% support or supportive	% opposed or negative
All subject species*	3	100%	0%
Blue passion flower	28	100%	0%
Boneseed	10	90%	10%
Moth plant	11	100%	0%
Pampas grass	18	89%	11%
Water celery and Vietnamese parsley	10	100%	0%
Feral and stray cats	69**	90%	7%
Sabella	6	100%	0%
Pest conifers (including wildings)	37	78%	22%

Blue Passion flower

- 4.14 There were 28 submissions in relation to blue passionflower, all expressing support for the proposal.
- 4.15 Proposed rule:

Over the duration of this Plan, occupiers within the Tasman-Nelson region must:

- a. Report sightings of blue passion flower on their land to Tasman District Council within five working days of their sighting.
- b. Destroy any blue passion flower on their property, on an annual basis, on the direction of an authorised person.

Boneseed

4.16 There were 10 submissions in relation to boneseed, most in support of the proposal. The submission in opposition disagrees with the potential for exemptions to be considered for steep, inaccessible areas.

4.17 Proposed rule:

Specific Rule for Boneseed in the Port Hills area:

Over the duration of this Plan, occupiers in the Port Hills area of Nelson, *as shown on Map*, must destroy any boneseed on their land, on an annual basis, prior to the completion of flowering, unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this rule.

Moth plant

4.18 There were 11 submissions in relation to moth plant, all expressing support for the proposal.

4.19 Proposed rule:

Over the duration of this Plan, occupiers within the Tasman-Nelson region must report sightings of the named Eradication Pests on their land to Tasman District Council within five working days of their sighting.

Pampas Grass

4.20 There were 18 submissions in relation to pampas grass. Almost all are supportive of the proposal. Two submissions recorded as “opposed” oppose the limited extent of control, vehement in their request for extension into other areas or across the region. Eight others were deemed generally ‘supportive submissions’, but also wanted control to be extended into other areas or across the region, or to include as a good neighbour rule, bringing the total proportion of submission seeking extension to 56%.

While staff support the sentiment of extending the control area for pampas, the negative Cost Benefit Analysis overall for pampas rules out this as an option at this point in time.

4.21 Proposed rule:

Over the duration of this Plan:

- a. Occupiers in Golden Bay (within the Sustained Control areas - Aorere Valley and Whanganui Inlet to Puponga) as shown on Map 2 (in this Proposal) must destroy any common and purple pampas on their land, on an annual basis, prior to the completion of flowering
- b. Occupiers in Golden Bay (adjoining the Sustained Control areas - Aorere Valley and Whanganui Inlet to Puponga) as shown on Map 2 (in this Proposal) must destroy any pampas within 200m of their property boundary (before completion of flowering) where the adjoining occupier (within the Sustained Control area) is taking reasonable steps to destroy pampas on the adjoining land. This is a Good Neighbour Rule.

Water Celery and Vietnamese Parsley

4.22 There were 10 submissions relating to water celery and Vietnamese parsley, all expressing support for the proposal.

4.23 Proposed rule:

Over the duration of this Plan occupiers within the Tasman-Nelson region must:

- a. Destroy any water celery and Vietnamese parsley on their land, on the written direction of an authorised person, on an annual basis, prior to the onset of flowering.
- b. Remove all fragments of water celery and Vietnamese parsley from their places (i.e. machinery, equipment and craft that have been in contact with waterway vegetation) when leaving infested waterways, and dispose of all fragments to landfill.

Feral Cats

- 4.24 In total there were 69 submissions in relation to the inclusion of feral and stray cats in site-led programmes. One was withdrawn and is not included in this analysis. One submitter expressed neither support nor opposition, advocating for humane reduction of feral and stray cats. Overall, the response was extremely positive with 90% of submitters being supportive of the proposals. There were no submissions opposing the inclusion of feral or stray cat management. The five submitters recorded as “opposed” oppose the limited extent of control, vigorous in their requests to extend the proposal across the region and/or to also manage companion cats.
- 4.25 The request for rules across the district will be addressed in Tasman through the proposed cat management bylaw. Nelson are currently conducting early engagement with the view to match the Tasman proposal. Staff do not believe it is an appropriate use of the Regional Pest Management Plan to have district-wide rules on companion cats. A cost-benefit analysis for management of cats at this scale would likely come out negative. Therefore we recommend that companion cats are best managed through a bylaw.
- 4.26 Two submitters highlighted a risk of the St Arnaud rules being interpreted to mean that a companion cat from outside of the St Arnaud area could legally be released. The proposed rule has been amended to address this.
- 4.27 One submitter questioned the reality of a rule requiring people to report sightings of cats in Nelson. Staff have amended this rule in response. The purpose of this rule is to support data gathering in order to inform future RPMP rules and operational planning.
- 4.28 One submitter requested extension of the Waimea Inlet site-led programme specifically relating to feral cat management on Bell Island and Dominion Flats. The submitter has since withdrawn a request to add other places. Attachment 1 depicts the proposed change. Staff believe that the addition of Bell Island has merit as it would not impose obligations that the land occupier would not otherwise be willing to accept and there would be no affected neighbours. Staff are concerned that the addition of Dominion Flats may affect adjacent occupiers who have not had an opportunity to be appropriately consulted on the proposed change.
- 4.29 Proposed Rules:
- Over the duration of this Plan, and with regard to high value sites within Nelson City:
- a) Any person who suspects the presence of any feral or stray cat in any named high value site shall report its presence and location to Nelson City Council within 48 hours of their sighting.
 - b) No person shall feed or shelter any feral or stray cat in any named high value site.
- Specific pest agent cat rule for the Nelson City site-led programme

No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on *Map*) any cat, including a companion cat.

Specific rule for feral and stray cats in the St Arnaud environs site-led programme

Over the duration of this Plan, and with regard to the St Arnaud site-led programme (as shown on *Map*):

Any person who suspects the presence of any feral or stray cat observed within the mapped area shall report its presence and location to Tasman District Council within 48 hours of their sighting.

Specific pest agent cat rule for the St Arnaud environs site-led programme

Over the duration of this Plan, and with regard to the St Arnaud site-led programme (as shown on *Map*):

- a. No person shall keep, hold or harbour any companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.
- b. No person shall deliberately release into the wild (into the Nelson Lakes National Park and environs) any cat, including a companion cat.

Additional rule for Abel Tasman National Park private enclaves

Following existing rules a. and b. and in relation to the ATNP site-led programme areas – Awaroa, Torrent Bay and Marahau North, as shown *map*:

- a. Any person who suspects the presence of any feral or stray cat within the ATNPSLP shall report its presence and location to Tasman District Council within 48 hours of their sighting.
- b. No person shall deliberately release into the wild (into the Abel Tasman National Park and private enclaves) any cat, including a companion cat. This is a specific pest agent cat rule for the Abel Tasman National Park and enclaves site-led programme.

Sabella / Clean hull

4.30 There were six submissions related to sabella, all generally supportive of the proposal. One submitter was concerned about one aspect of the rule in the proposal. This related to the rule explanation for rule (a) (Rule a. is also not intended to apply to those craft that are usually moored in the Tasman-Nelson region and leave the region for no more than 24 hours before returning) where the suggested timeframe was too short to be realistic. Staff suggest extending this timeframe to 3 calendar days. This would allow for local boaties to go on long weekend trip to neighbouring regions without triggering the rule, but so long that they would be able to visit high risk ports and inadvertently bring back pests.

4.31 Proposed rule:

Over the duration of this Plan:

- a. The owner or person in charge of any marine craft entering the Tasman-Nelson region must ensure that the fouling on the hull and niche areas of the craft does not exceed level 2 on the Cawthron level of fouling (LoF) scale, unless:
 - i) The craft is entering Tasman-Nelson for the purpose of hauling out. The haul out must be undertaken within 24 hours of arriving. Proof via receipt from a haul out facility must be provided to an Authorised Person if requested, or
 - ii) The craft is entering Tasman-Nelson for emergency purposes and the craft leaves the region within 24 hours of arrival (or otherwise the occupier needs to comply with the rule), or
 - iii) The craft is required to enter Tasman-Nelson in response to a declaration of a state of emergency, as determined by the Ministry of Civil Defence & Emergency Management.

Wilding conifers

- 4.32 In total, there were 37 submissions in relation to wilding conifers. Most (78%) were supportive of the proposals. Of those recorded as “opposed”, opposition centres around the use of rules, rule wording, the lack of specificity in the analysis of costs and benefits, and/or a lack of clarity. One submission in opposition and two that are generally supportive expressed preference for greater use of incentives over the use of rules.
- 4.33 A key concern raised by the forestry sector revolve around the proposal to use a rule (rule b) to impose an obligation on the occupiers of plantation forests to bear the cost of wilding *Pinus radiata* control on adjacent properties where it is evident that the source of wilding spread is the plantation forest and it is evident that the adjacent property is clear of or being cleared of pest conifers. Staff recommend amending rule b to reflect the rule wording proposed by the forestry joint submission.
- 4.34 Another concern raised related to the accuracy of the maps of operational areas where rules to maintain areas that have been cleared of pest conifers under nationally and regionally-funded control programmes apply. The concern was that the rule might impose an obligation on forestry to remove legitimately planted conifers in areas of overlap. Given the continuous change in mapped boundaries and over time, staff recommend referring to given maps as guidance only. When a complaint is received by an Authorised person, part of the investigation would be to accurately map the relevant boundaries, understand where plantation boundary is, and where the rule applies to ensure the purpose of the rule is met. In complex situations, staff are of the view that the issue might better be approached using negotiated management agreements rather than altering the maps.
- 4.35 In addition to the forestry sector, other submitters have commented that the cost benefit analysis did not reflect the regional situation. To add more regional context, the “Wilding Conifers Scenario Exploration” tool developed by Landcare Research (<https://wildingconifers.landcareresearch.co.nz/>) has been used to generate the return on investment of wilding conifer control within infested Tasman District and Nelson City catchments. The model takes into consideration the cost to biodiversity, the cost of reduction in water yield, the benefit of erosion reduction, loss of pastoral productivity, and change in head fire intensity. The results are presented in Attachment 2.
- 4.36 Proposed rule:

Over the duration of this Plan, within the Tasman-Nelson region and prior to cone bearing:

- a. Occupiers must destroy all pest conifers present on land they occupy, unless the land they occupy falls within a named pest conifer operational area (as shown in *Maps*), urban areas or areas of high intensity land use (as determined by an authorised person), or unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.
- b. From 1 July 2024, occupiers of forest plantations (greater than 1 hectare), outside of named pest conifer operational areas, are liable for the costs of removal of any new wilding conifers present (i.e. subsequently occurring) on adjoining land (where that land is clear of any infestation of wilding conifers as of 30 June 2024). This requirement is limited to adjoining land within 200m of the forest plantation property's boundary and the adjoining occupier must be taking reasonable steps to control wilding conifers elsewhere on the property. This obligation will be on written direction from an authorised person, following a complaint from an adjoining affected neighbour, and where there is evidence that wilding spread has occurred from the planted forest to an adjoining property. A negotiated agreement between the Management Agency and the two occupier parties is an alternative way to achieve this agreement.

Reasonable steps: means an occupier is proactively managing wilding conifers and using approaches, methods and tools advocated in the National Programme's Best Practice Guidelines for managing wilding conifers.

Evidence of spread includes (but is not limited to):

- That the wilding conifers are the same species as those in the forest plantation.
 - That the source forest plantation trees were of cone-bearing age on 1 July 2024, and
 - There are no other likely seed sources located on the adjoining land or other neighbouring land.
- c. Occupiers must destroy any pest agent conifer on their land, on direction of an authorised person, where an adjoining occupier is undertaking proactive wilding conifer control on their land and that evidence of wilding spread is clearly attributable to the pest agent conifer(s), or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

Over the duration of this Plan, within the above operational areas under current management, in the Tasman-Nelson region (as shown in *Maps*) and prior to cone bearing:

- d. Occupiers must destroy any pest conifers on their land where the property is located within one of the four named operational areas that has received prior control, or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement. This rule does not imply any obligations on occupiers of planted forests of species not listed as pest conifers and does not apply until a property has received initial and maintenance control, as described above.

- e. Occupiers within any of the four named operational areas must destroy any pest conifers on their land within 200m of an adjoining property boundary, where the adjoining property has previously been cleared of pest conifers through prior control and the adjoining occupier is also taking reasonable steps to control pest conifers within 200m of their property boundary. This is a Good Neighbour Rule (GNR) and will apply unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

Options

4.37 Staff recommend Option 2

Option 1: Make no changes to the proposal document in response to submissions	
Advantages	<ul style="list-style-type: none"> •
Risks and Disadvantages	<ul style="list-style-type: none"> • The submission process brought in a number of valid concerns, and well considered suggested changes. Not changing the proposed rules in response (where appropriate) would not be following good practice
Option 2: Support the staff recommended changes to the proposal document in response to submissions for all proposed rules	
Advantages	<ul style="list-style-type: none"> • Changes take into consideration all reasonable requests for change from the submission process. Changes have been made to: <ul style="list-style-type: none"> Sabella – increasing the time local boats can leave the area to 3 days. ○ Feral Cats - minor re-wording to clarify rule intention, inclusion of bell island in Waimea Inlet site led programme ○ Various minor re-wording changes to wilding conifers to clarify intent of the rules, change to “Rule B” in response to forestry submission • Rules are deemed appropriate for operational delivery and have been agreed on by biosecurity staff in NCC and TDC

Risks and Disadvantages	<ul style="list-style-type: none"> • Joint Committee may have opinions or changes they wish to see that are not reflected in the proposed changes • Not every submission request has been actioned and some submitters may feel they have not been represented in the changes
<p>Option 3: Support the changes to the proposal document in response to submissions recommended by staff in part with some changes (note changes to the proposed rules must be in response to submissions and within scope of the TOR for the Joint Committee)</p>	
Advantages	<ul style="list-style-type: none"> • Joint Committee members may have changes they would like to see reflected in the proposal following deliberations.
Risks and Disadvantages	<ul style="list-style-type: none"> • More than minor changes may have a direct effect on operational delivery and may need further consideration

<p>Considerations for Decision Making</p>	
<p>1. Fit with Purpose of Local Government</p>	<p>Section 13.1(c) of the Biosecurity Act 1993 gives power to regional councils to prepare proposals for, make, and implement regional pest management plans and regional pathway management plans:</p>
<p>2. Consistency with Community Outcomes and Council Policy/Legal requirements</p>	<p>The Tasman Nelson Regional Pest Management Plan 2019-2029 is funded through the LTP of both Tasman District Council and Nelson City Council.</p> <p>The RPMP delivers some outcomes within the Tasman Biodiversity Strategy and Nelson Biodiversity Strategy.</p>
<p>3. Strategy and Risks</p>	
<p>4. Financial impact/Budgetary implications</p>	<p>The proposed changes can be delivered within the current Councils LTP budgets in the short to medium term. The cost benefit analysis guides making rule changes that are beneficial in the long term.</p>
<p>5. Degree of significance and level of engagement</p>	

This matter is of high significance due to the direct impact of some of the proposed policy changes to the community.

There is a cost outcome Therefore the following engagement/feedback/consultation will occur in the form of...

6. Climate Impact

Biosecurity supports the resilience of indigenous biodiversity to the impacts of climate change. A complete ecosystem, free of the pressure of pests is much more capable of responding to the changing climate. The reduction of wilding conifers improves the water storage capabilities of the land.

7. Inclusion of Māori in the decision making process

The proposed changes were uploaded to both NCC and TDC Iwi engagement portals.

The 'RPMP Joint Committee' has the responsibility for:

- a. Considering recommendations for amendments (limited review) to Tasman-Nelson Regional Pest Management Plan 2019 – 2029;
- b. The review will be limited to considering:
 - Alignment of Sabella rules to those of Marlborough District Council to provide consistency across the Top of the South; and
 - Extending control of boneseed into the Port Hills area currently excluded from eradication; and
 - Control of wilding conifers, water celery, Vietnamese parsley, purple pampas, blue passionflower, and moth plant.
- c. Hearing and deliberating on the public submissions related to amendments (limited review) of the Tasman-Nelson Regional Pest Management Plan 2019 - 2029; and
- d. Making recommendations to the Tasman District and Nelson City Councils to adopt any changes (limited review) of the Tasman-Nelson Regional Pest Management Plan 2019 – 2029.

5. Conclusion and Next Steps

- 5.1 The Committee will make a recommendation to both Councils that the proposed changes to the RPMP be adopted.
- 5.2 The recommendation will be taken to full council at both Tasman District Council and Nelson City Council for adoption.

6. Attachments

1.	Feral and Stray Cat Provisions	21
2.	Wilding Pest Conifer Provisions	34
3.	Summary of submissions with staff recommendations	49

Feral and stray cat provisions for Tasman-Nelson Partial RPMP Review

**Revision in response to submissions and hearings (marked
up version)**

July 2024

Several edits are identified for the feral/stray cat policy provisions for the RPMP partial review. The starting point was the policy contained in the public Proposal notified in February 2024. Following submissions, and subsequent internal discussions on these submissions, staff have made suggested changes for consideration during deliberations. For clarity to the Regional Pest Management Joint Committee and submitters, staff's suggested edits are presented below in a marked up version of the feral and stray cat section of the original Proposal.



4.4 Pest animals

4.4.1 Feral and stray cats (*Felis catus*)

Current status: Feral cats, only, are included in the Waimea Estuary site-led programme.

Proposed management category:

Exclusion	Eradication	Progressive Containment	Sustained Control	Site-Led
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Further site-led programmes are proposed for both feral and stray cat management in Tasman and Nelson.

Rationale for inclusion: Both Councils wish to step up feral and stray cat management at sites with important biodiversity values and further promote responsible companion cat ownership overall. Cats in general contribute to negative impacts on indigenous biodiversity (e.g. direct predation on native birds, reptiles and insects, freshwater fish and invertebrates across the region, or indirectly through nest or colony desertions). This proposal concerns management of feral and stray cats at several named high-value sites:

- Nelson City – inclusion of general management rules and a pest agent cat rule at numerous named publicly owned/managed sites.
- Abel Tasman National Park (ATNP) private enclaves – by adding a general reporting rule to the existing site-led programme and including a new pest agent cat rule.
- St Arnaud site-led programme – inclusion of a general reporting rule and a pest agent cat rule.
- Waimea site-led programme – addition of Bell Island.

The ability to distinguish companion cats from feral and stray cats may rely over time on bylaws or national cat regulations (around compulsory microchipping) being implemented to support RPMP provisions (and vice versa). Desexing of cats also assists with long term management.

Description and adverse effects:



Feral and stray cats originate from reproduction of feral or stray cats or illegally released/dumped companion cats. They are usually short-haired and slightly built, with large heads and ‘sharp’ features. Coat colours revert to black, tabby or tortoiseshell, with varying extents of white. Adult male cats are generally larger than females and can weigh up to 5kg. They can produce two or three litters per year with an average of four young in each.

New Zealand’s unique native wildlife is particularly vulnerable to predation by all cats. Feral and stray cats in particular kill young

and adult birds and occasionally take eggs and prey on native lizards, fish, frogs and large invertebrates. Cats in general are highly efficient predators, and have been known to cause local extinctions of seabird species on islands around the world. Birds that nest or feed on or near to the ground are particularly at risk. Feral and stray cats are aggressive towards companion (owned) cats and also carry parasites and toxoplasmosis, which can cause serious illness in people, abortions in sheep and may adversely affect native birds in the region

*The following cat definitions apply when reading this Plan.

Type	Relationships with humans	Considerations
Companion cat	Directly dependent	Has owner/guardian
Stray cat	Directly or indirectly dependent	Community cat(s), semi-owned, unowned, managed or unmanaged as a single cat or colony
Feral cat	Independent and unsocial	Wild animal, considered a pest in many regions in NZ

Source: SPCA/NZ Cat Management Strategy

Any cat can also be deemed a ‘pest agent cat’ under the RPMP, with rules. Pest agent cat definition under this Plan is: any cat that in any way leads to the replication or survival of feral or stray cat populations.

Plan rules and explanations of rules:

New approaches for (i) Nelson City – specific high value sites, (ii) current ATNP site-led programme and (iii) new St Arnaud environs site-led programme. Rules are noted as follows:

Specific rule for feral and stray cats in the Nelson City site led programmes

Over the duration of this Plan, and with regard to high value sites within Nelson City (as shown on Map 3.1 in this Proposal):

- a) Any person who suspects the presence of any feral or stray cat in any named high value site shall report its presence and location to Nelson City Council within 48 hours of their sighting.
- b) No person shall feed or shelter any feral or stray cat in any named high value site.

Explanation of the rules

Rule a. is in accordance with section 73(5)(a) of the Act to assist NCC in detecting the presence of feral or stray cats for the purposes of biodiversity protection and wildlife management. Reporting of feral and stray cats in these areas by the public is encouraged. Reports will be

recorded in an appropriate council database and the information considered when assessing the need for any management at the site(s).

Rule b. is in accordance with section 73(5)(d) of the Act to discourage people supporting cat colonies on public land with recognised high biodiversity values.

Specific pest agent cat rule for the Nelson City site-led programme

No person shall deliberately release into the wild (in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any cat, including a companion cat.

Explanation of the rule

This pest agent rule is in accordance with sections 73(5)(e), (j) and (l) of the Act and aims to support council and community efforts in Nelson to protect wildlife and biodiversity values, by restricting the ability for companion cats potentially breeding with feral or stray cats. It also assists with reducing the likelihood of companion cats being released into the wild, at named sites, and causing long term effects.

Specific rule for feral and stray cats in the St Arnaud environs site led programme

Over the duration of this Plan, and with regard to the St Arnaud site-led programme (as shown on Map 3.2 of this Proposal):

Any person who suspects the presence of any feral or stray cat observed within the mapped area shall report its presence and location to Tasman District Council within 48 hours of their sighting.

Explanation of the rule

This rule is in accordance with section 73(5)(a) of the Act to assist TDC and DOC in detecting the presence of feral or stray cats for the purposes of biodiversity protection and wildlife management. Reporting of feral and stray cats in this area by the public is encouraged. Reports will be recorded in an appropriate council database and the information considered when assessing the need for any management at the site.

Specific pest agent cat rules for the St Arnaud environs site-led programme

Over the duration of this Plan, and with regard to the St Arnaud site-led programme (as shown on Map 3.2 of this Proposal):

- a. No person shall keep, hold or harbour any companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.
- b. No person shall deliberately release into the wild (into the Nelson Lakes National Park and environs) any cat, including a companion cat.

Explanation of the rule

Pest agent rules a. and b. are in accordance with sections 73(5)(a), (d) and (h) of the Act and aim to support existing St Arnaud community work to protect wildlife and biodiversity values, by restricting the presence of companion cats living in the St Arnaud area and potentially

breeding with feral or stray cats. It also assists with reducing the likelihood of companion cats being purposely released into the wild around St Arnaud and causing long term impacts.

Additional rules for Abel Tasman National Park private enclaves

Following existing rules a. and b. and in relation to the ATNP site-led programme areas – Awaroa, Torrent Bay and Marahau North, as shown in three maps (Map 3.31, 3.32 and 3.33, respectively, of this proposal):

- c. Any person who suspects the presence of any feral or stray cat within the ATNPSLP shall report its presence and location to Tasman District Council within 48 hours of their sighting.

- d. No person shall deliberately release into the wild (into the Abel Tasman National Park and private enclaves) any cat, including a companion cat. This is a specific pest agent cat rule for the Abel Tasman National Park and enclaves site-led programme.

Explanation of the rule

Note: the current rule explanation is generic to cover the intent of the inclusion of feral/stray cats but needs to be edited to read 'named pest plants and pest animals' in two places.

A breach of any of the above rules is an offence under Section 154N(19) of the Act.

Plan change to include Bell Island in the Waimea Estuary Site-led Programme

Note: This change is an extension to the existing Waimea Estuary Site-led Programme and covers all of the pests listed in that programme. The change requires minor editing of the RPMP. It does not introduce any new rules or obligations on occupiers except for the occupier of Bell Island (Tasman District and Nelson City Councils) who must report the presence of the named pests to Tasman District Council and allow access to an authorised person to control the pest. This is not a material change to that occupier's current obligations under the RPMP and does not affect adjacent occupiers.

Proposed changes are as follows (underlined):

- Site Description (Table 10, page 58, paragraph 5). "*...areas along the southern side of Waimea Estuary and Bell Island to protect...*"
- The map of the Waimea Inlet Side-led Programme (RPMP Map 19, page 107) to be updated to include Bell Island (as per Map 3.34 in this Proposal).

Alternate options:

1. Do nothing additional to what's already included in RPMP – this won't address the growing call from environmental groups and the community for both Councils to step up their leadership to address declining biodiversity values.
2. Rely on bylaw development by both councils to better manage all cats - however bylaws should not be used to manage pest situations and the RPMP deals with pests only and should not entertain companion animal management (other than via pest agent rules).
3. Rely solely on national cat legislation developed. However, any national cat legislation would likely be years away.

Further assumptions explain the rationale for inclusion of feral / stray cats in the Proposal:

- The RPMP is the most suitable legal tool to consider feral / stray cat management regimes, but realistically only through site-led programmes.
- Local bylaws are best suited for the widespread management of companion cats through bylaws around compulsory microchipping and desexing, in the absence of national cat management legislation.
- It is difficult to impose rules in the RPMP requiring occupiers to control / destroy cats as they are highly mobile (i.e., it would be difficult to use land tenure as the identifier for non-compliance) and may be owned (i.e., a cat may also be property) but not identified as such.
- Any cat could be deemed a 'pest agent cat' in certain circumstances, such as a companion cat which, in any way leads to the replication or survival of stray or feral cat populations.

RPMP edits required:

- Add principal measure 'd.' to Site Led Pests Programme (pg. 57): [Service delivery: the Councils, their agents, or other parties authorised by the Councils may undertake direct control of named pests in the site-led category at their discretion \(e.g. as part of an integrated predator animal control at named high value sites\), as outlined in the RPMP Operational Plan.](#)
- Add new site led programmes, edit programme descriptions, and add/edit maps as outlined above¹.

¹ Note: A revised site-led programme has been drafted but is not included in this Proposal due to its length. Note also to ensure that the maps are consistent with the existing RPMP, the map references and formats may change.

Regional Pest Management Plan



 Feral and Stray Cat-related Site-led Programmes (overview only)

 Map 3


Mapped Area: Nelson and Tasman – all sites



Map background courtesy of OpenStreetMap and its contributors

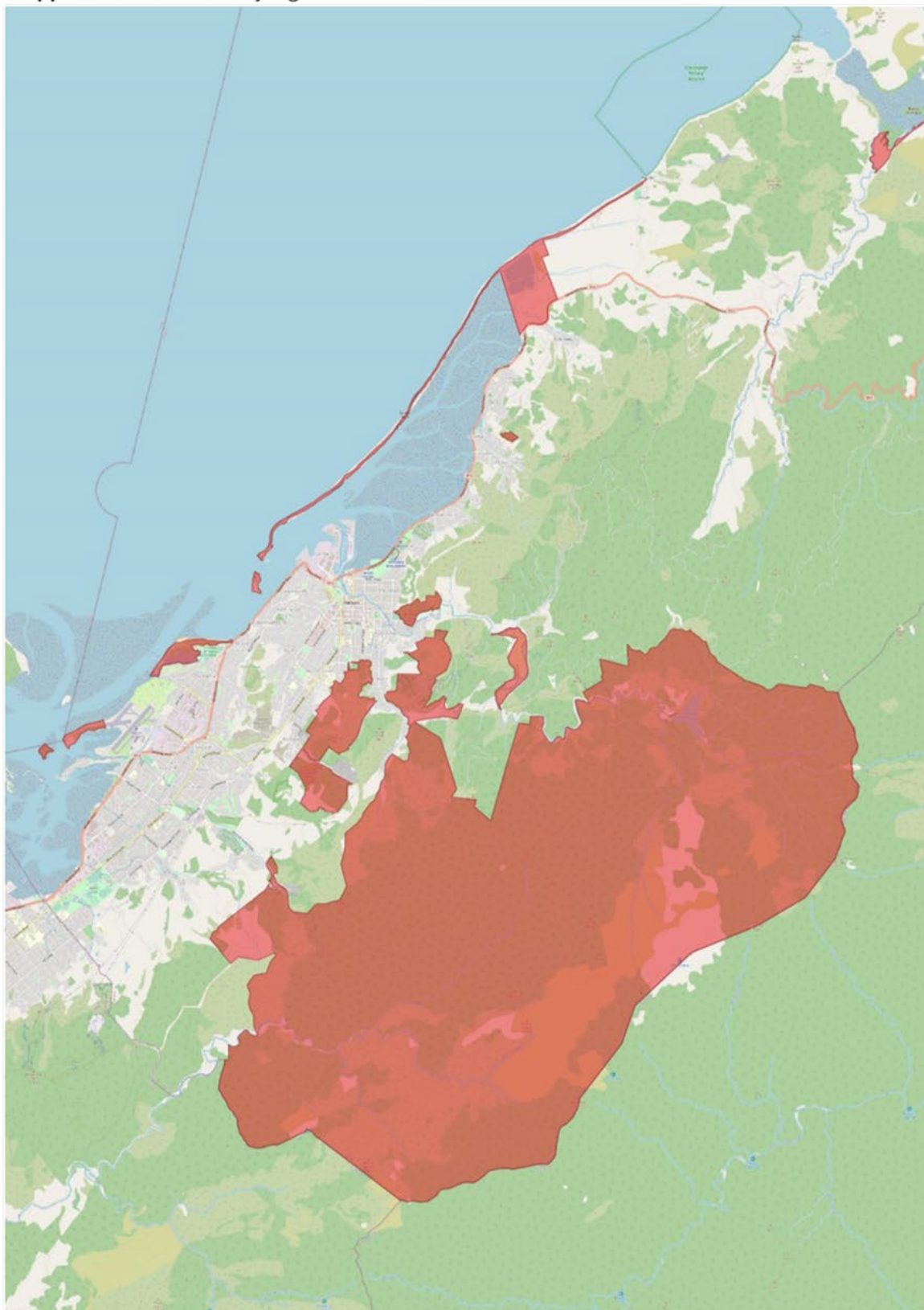
Regional Pest Management Plan



 Feral and Stray Cats in Site-led Programmes

 Map 3.1

Mapped Area: Nelson City high value sites



Map background courtesy of OpenStreetMap and its contributors

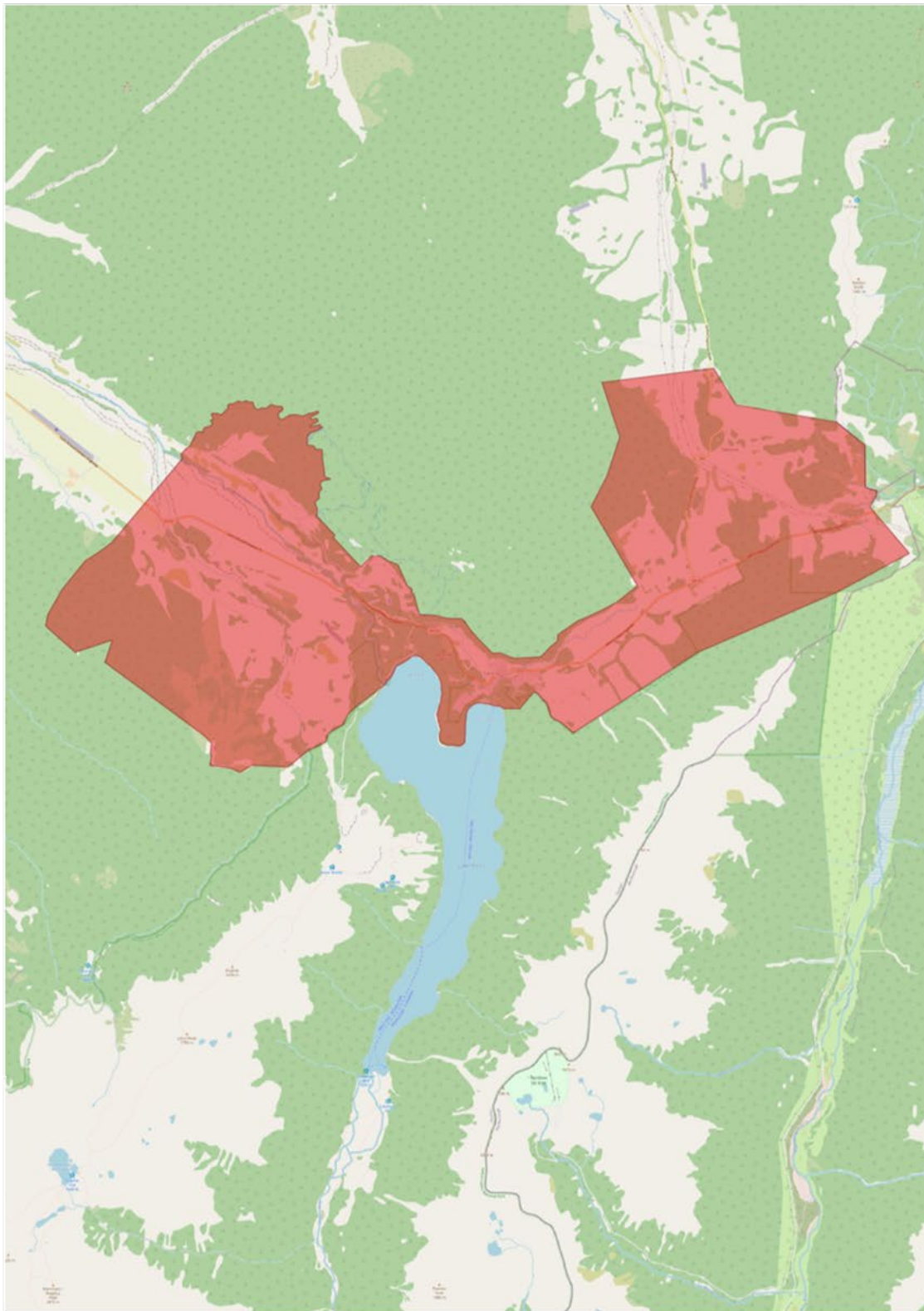
Regional Pest Management Plan



 Feral and Stray Cats in Site-led Programmes



Mapped Area: St Arnaud environs



Map background courtesy of OpenStreetMap and its contributors

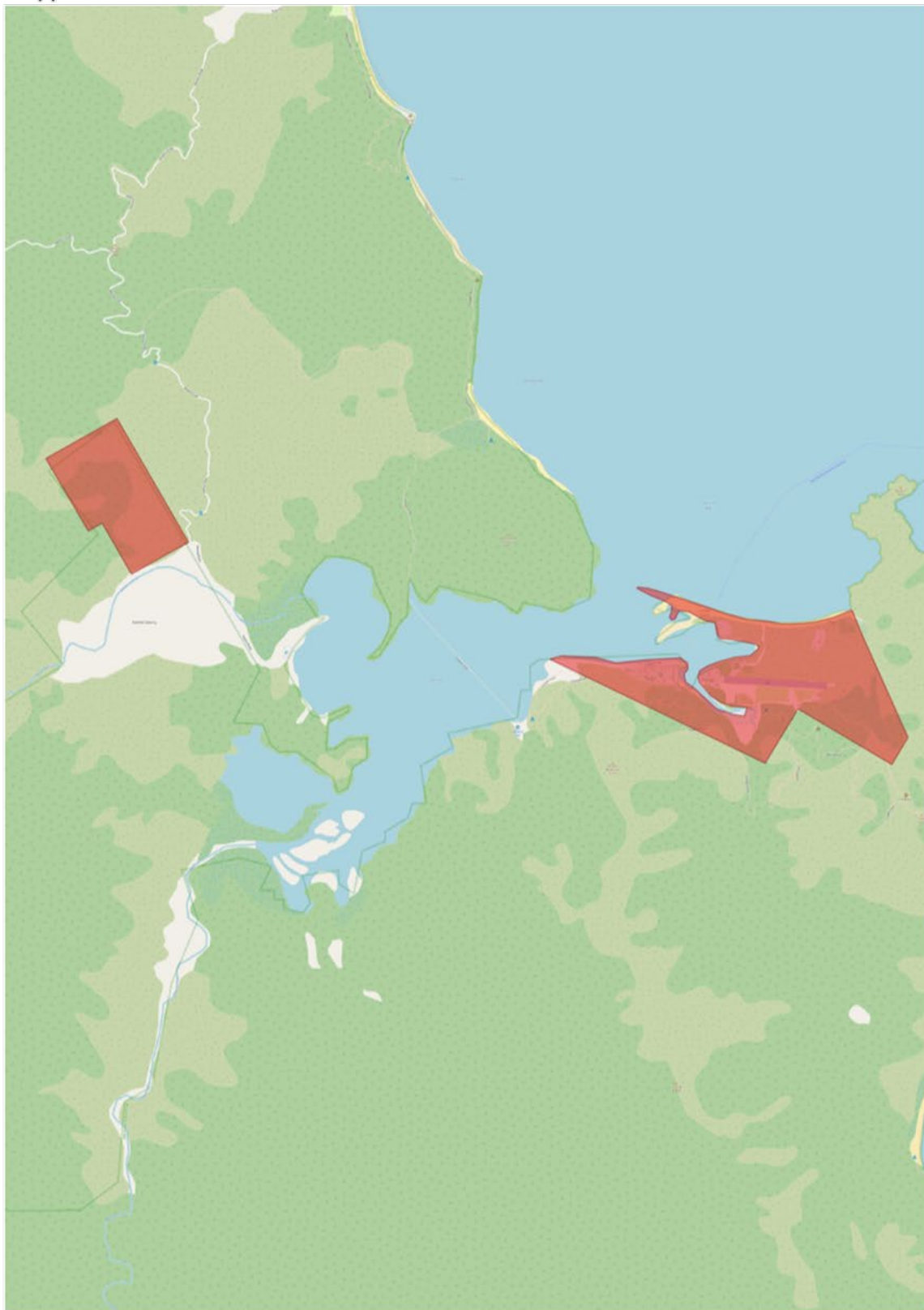
Regional Pest Management Plan



 Feral and Stray Cats in Site-led Programmes

 Map 3.31

Mapped Area: Abel Tasman NP – Awaroa



Map background courtesy of OpenStreetMap and its contributors

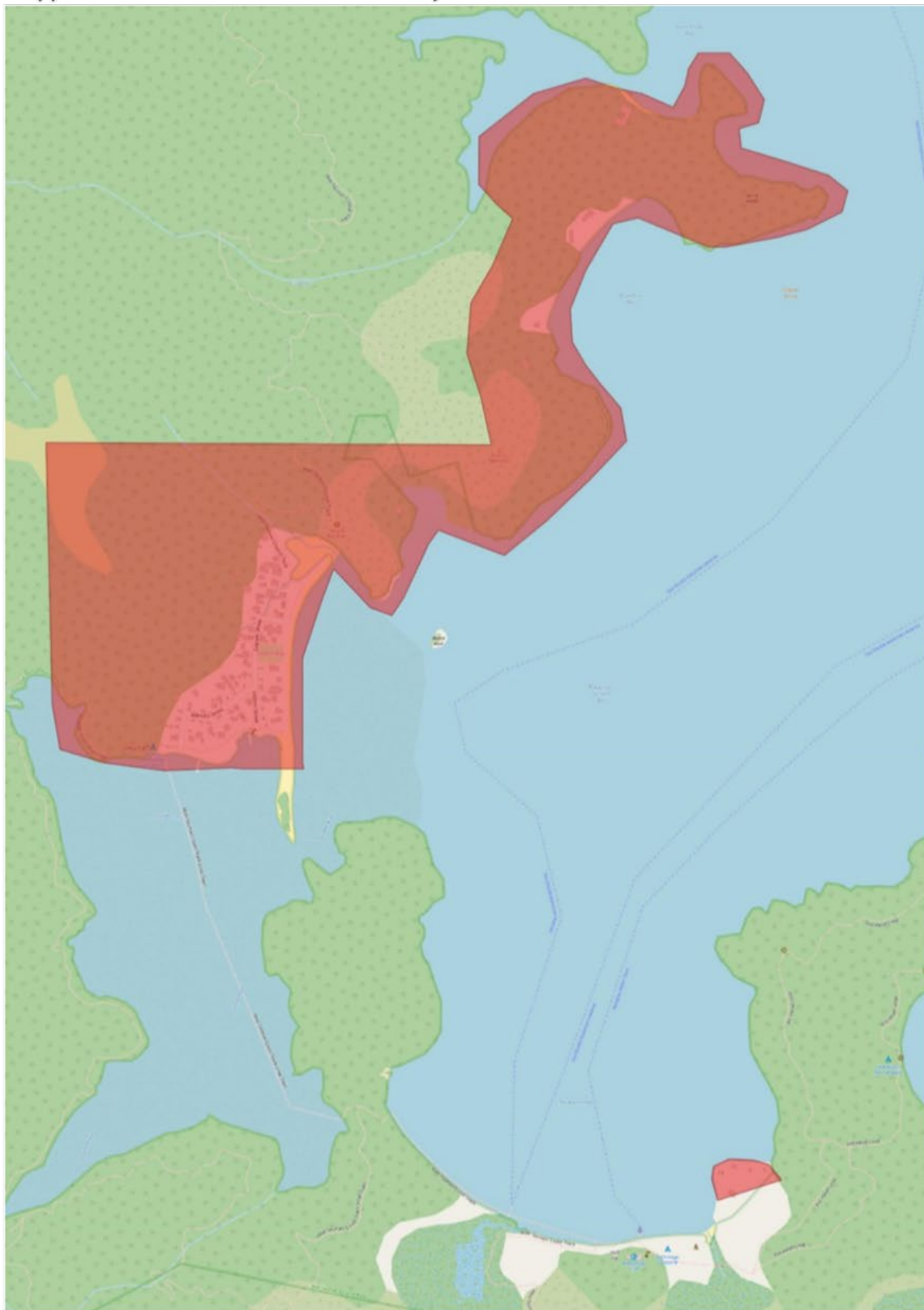
Regional Pest Management Plan



 Feral and Stray Cats in Site-led Programmes

 Map 3.32

Mapped Area: Abel Tasman NP – Torrent Bay



Map background courtesy of OpenStreetMap and its contributors

Regional Pest Management Plan



 Feral and Stray Cats in Site-led Programmes

 Map 3.33

Mapped Area: Abel Tasman NP – Marahau North




Map background courtesy of OpenStreetMap and its contributors

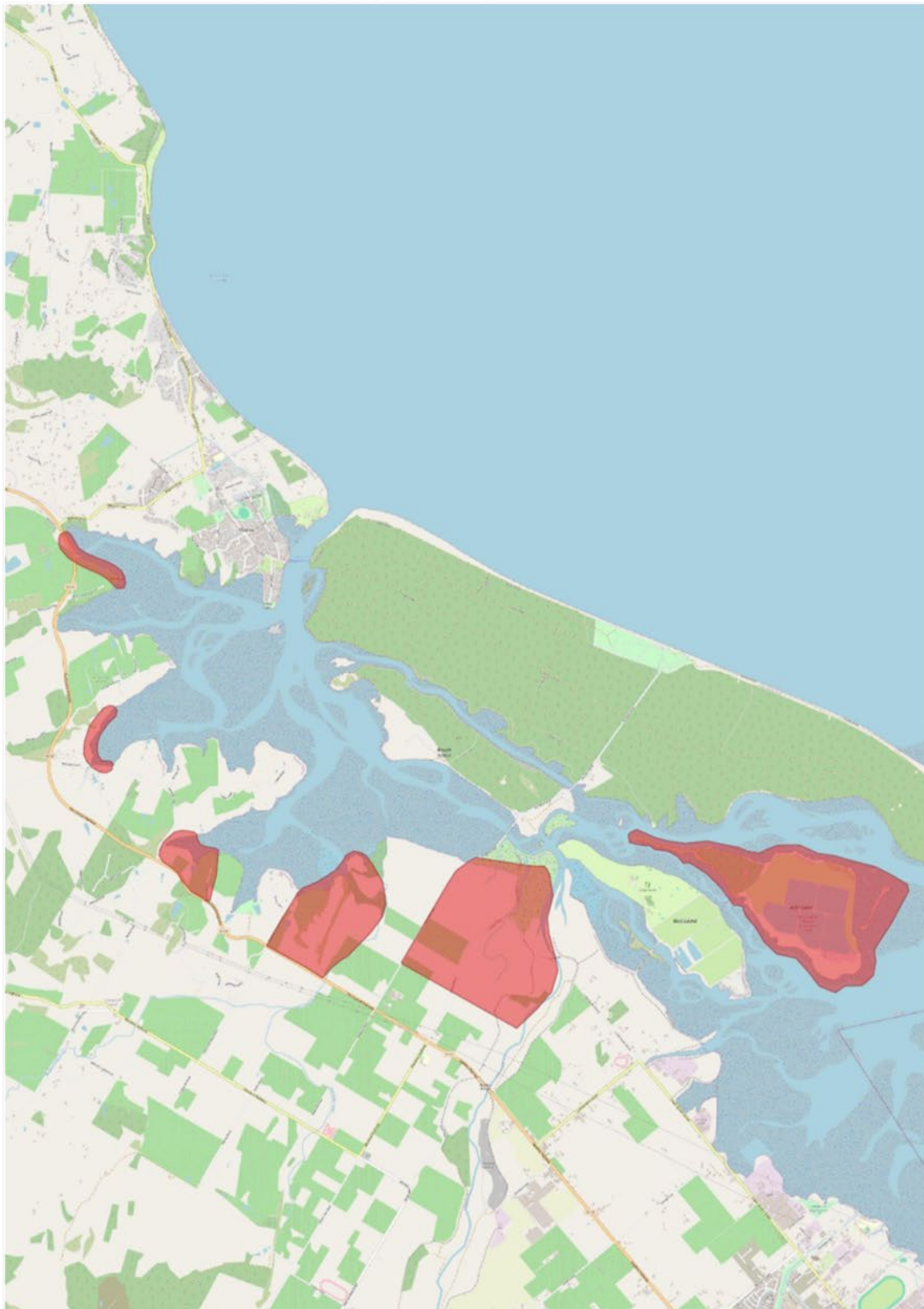
Regional Pest Management Plan



 Various Pests Site-led Area

 Map 3.34

Mapped Area: Waimea Inlet (including Bell Island)



Map background courtesy of OpenStreetMap and its contributors

Pest conifer provisions for Tasman-Nelson RPMP Partial Review

Revisions in response to submissions and hearings (Marked up version)

July 2024

Several edits are identified for the pest conifer policy provisions for the RPMP partial review. The starting point was the policy contained in the public Proposal notified in February 2024. Following submissions, and subsequent internal discussions on these submissions, staff have made suggested changes for consideration during deliberations. For clarity to the Regional Pest Management Joint Committee and submitters, staff's suggested edits are presented below in a marked up version of the pest conifer section of the original Proposal.



4.5 Pest conifers

Current status: No species of conifers are currently named as pests except for Douglas fir, and only within the Abel Tasman National Park enclaves and subsequent ATNP site-led programme.

Proposed management category:

Exclusion	Eradication	Progressive Containment	Sustained Control	Site-Led
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Subjects covered and definitions:

There are 12 conifer species declared pest conifers in the RPMP, as listed in Table 6. Ten individual species are designated pests in any regional situation while the wilding conifer sub-class of subjects covers two species and their pest designations apply only when they occur in wilding states.

Table 6: Subjects of the pest conifer programme

Individual subjects	
• Bishops pine (<i>Pinus muricata</i>)	• Maritime pine (<i>Pinus pinaster</i>)
• Contorta pine (<i>Pinus contorta</i>)	• Mexican weeping pine (<i>Pinus patula</i>)
• Corsican pine (<i>Pinus nigra</i>)	• Ponderosa pine (<i>Pinus ponderosa</i>)
• Mountain pine (<i>Pinus mugo</i>) including sub-species and botanical variants	• Scots pine (<i>Pinus sylvestris</i>)
• European larch (<i>Larix decidua</i>) and botanical variants	• Western white pine (<i>Pinus monticola</i>)

Definition

'Pest conifers' - refers to organisms included in the Progressive Containment Programme in the RPMP that are declared pests and for which there are legal implications for occupiers¹.

Class of subjects

Wilding conifers

Definition

'Wilding conifers' - means any introduced conifer tree, including (but not limited to) any of the species listed in the above table, established by self-seeded 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 conifer trees.

Species for the purposes of the wilding conifers class description include (but are not limited to):

¹ The single term 'pest conifer' is predominantly used (rather than pest/wilding conifer) when referring to any of the named subjects in Table 6, but still enables use of the sub-category term 'wilding conifers' when this is relevant or is all that is intended to be captured by a rule.

- | | |
|--|---|
| • Douglas fir (<i>Pseudotsuga menziesii</i>) | • Radiata pine (<i>Pinus radiata</i>) |
|--|---|

Pest conifers impact on numerous regional values. Contorta pine is the most invasive of this group and is deemed an Unwanted Organism nationally. Some species have commercial worth where they have been planted prior and progressively harvested. However, most have little or no economic worth, in contrast to the significant environmental cost of their spread.

Radiata pine and Douglas fir are commercially grown in the region. The RPMP is not concerned with preventing production or permanent forestry operating within an occupier's private property. However, plantations of these species may result in self-seeded and unintentional spread, hence self-seeded trees of these two species, outside of existing forest plantations, are deemed to be 'wilding conifers'².

This Plan also refers to pest agent conifers. 'Pest agent' has the same meaning as in the Biosecurity Act 1993: in relation to any pest, means any organism capable of helping the pest replicate, spread or survive.

Definition

'Pest agent conifer' - means any introduced conifer (that is not otherwise specified as a pest within the RPMP) that is capable of helping the spread of wilding conifers and is not located within a forest plantation (e.g. a shelter belt of Douglas fir under 1 ha. in an area that is clearly exacerbating seed spread issues for a neighbouring property).

Adverse effects:

Wilding conifers cause significant impacts on native ecosystems in the Tasman-Nelson region, such as invading iconic tussock grasslands, alpine herblands and (in particular) the ultramafic areas of Dun Mountain and the Red Hills.

National analysis of trends indicates that wilding conifers can outcompete native species in regenerating scrub for space, water and nutrients, adversely affect recreational and visual/landscape values, alter soil and soil fauna, reduce pastoral farming availability, reduce water availability (for irrigation and hydro power generation) and may help create or contribute to wildfire risks.

All these impacts are also likely to adversely affect tangata whenua values across Te Tau Ihu. Some adverse effects may be exacerbated by the potential impacts of climate change (e.g. more frequent or intense drought/dry conditions which could make some catchments more prone to flow sensitivity). Having increasing infestations of wilding conifers may lead to increased uptake of available water in vulnerable catchments.

Rationale for inclusion:

² Douglas fir seed spreads long distances and creates a greater seed spread risk than *P. radiata*.

Pest and wilding conifers are included for the first time in the RPMP to help manage their spread more effectively³. A key objective is operationally focused - to maintain the gains of prior and current control efforts in four designated operational areas (refer to Map 4):

- Mt Richmond Wilding Conifer Management Unit⁴;
- Takaka Hill – Takaka Hill Biodiversity Group Trust;
- Abel Tasman National Park (ATNP) - Project Janszoon; and
- Golden Bay (including the ATNP Halo) - Project De-Vine Environmental Trust.

The general approach (including regulation) aligns with Marlborough District Council and Environment Canterbury pest conifer policies and is practical and adaptable while advocating for negotiated agreements between parties as an alternative to enforcing rules (where the result may achieve the same or similar outcomes as rules).

Equally, there are two strategic objectives to support their inclusion:

- Firstly, to help stop further spread and protect land in Tasman-Nelson that has not been impacted by pest conifers to date (or to control infestations that are just becoming noticeable). History has shown that an important contributor to pest conifer spread problems is a lack of early action, and that the cost of control increases significantly the longer spread is left uncontrolled.
- Secondly, the inclusion of wilding radiata pine and wilding Douglas fir is intended to address the negative effects of wild dispersal of these species from planted situations such as plantation forests, hedgerows, and specimen trees. The intention is to enhance the existing obligation on the forestry industry to manage seed dispersal effects as part of that sectors' social licence to operate in Tasman-Nelson.

The development of appropriate rules to support these objectives is important - (1) to help prevent new areas of pest conifers becoming established due to a lack of proactive action; and (2) landoccupiers neighbouring onto forest plantations should not be liable for, or have to undertake pest control on their land through, the spread of self-seeded conifers from forest plantations.

Plan rules and explanations of rules:

One pest conifer programme will be implemented, which includes two sub-programmes - one that applies to the entire Tasman-Nelson region and another covering the four specific operational areas.

i. Region-wide programme

³ Their inclusion now also provides a lead in for a full review in 2028/29 when the whole operative RPMP requires reviewing.

⁴ The Mt Richmond MU (through prior administrations) has a long history of locally funded wilding conifer control operations occurring. Operations in the MU now involve a consortium of national, regional and local stakeholders (including MDC) and are funded locally/regionally as well as through the National Programme. At least \$5M has been spent on control to date.

There are three rules:

- A ‘clear land rule’ – that focuses on the eradication of pest conifer seedlings before they can proliferate and spread;
- A ‘planted forest (wilding conifer spread) rule’ – to manage self-seeded spread from forest plantations onto neighbouring land; and
- A ‘pest agent conifer rule’ – to manage potential seed sources that may impact neighbouring properties and halt the spread of wilding conifers in general.

Specific rules applicable across the whole region

Over the duration of this Plan, within the Tasman-Nelson region, and prior to cone bearing:

- a. Occupiers must destroy all pest conifers present on land they occupy, unless the land they occupy falls within a named pest conifer operational area (as shown in Maps 4.1, 4.2, 4.31 and 4.32), urban areas or areas of high intensity land use (as determined by an authorised person), or unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

➤ *Reasonable steps: means an occupier is proactively managing wilding conifers and using approaches, methods and tools advocated in the National Programme’s Best Practice Guidelines for managing wilding conifers.*

➤ *Evidence of spread includes (but is not limited to):*

- *That the wilding conifers are the same species as those in the forest plantation.*
- *That the source forest plantation trees were of cone-bearing age on 1 July 2024, and*
- *There are no other likely seed sources located on the adjoining land or other neighbouring land.*

- c. Occupiers must destroy any pest agent conifer on their land, on direction of an authorised person, where an adjoining occupier is undertaking proactive wilding conifer control on their land and that evidence of wilding spread is clearly attributable to the pest agent conifer(s), or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

(ii) Current operational areas under management

An assumption is made that current priority control areas and programmes (included in the National Wilding Conifer Control Programme) will continue to be funded until the ‘back of each problem’ is broken (i.e. no coning trees remain on target properties) and responsibility for ongoing control can be transitioned (i.e. transferred) back to individual land occupiers to manage into the future. ‘Transitional criteria’ nationally at the time of writing were not fully agreed, however the following rules would not be implemented until an operational area had

received initial control and up to 2-3 rounds of maintenance control (with varying years, i.e. typically 3-5 years, between control cycles, dependant on the species)⁶.

There are four pest conifer control operational areas in Tasman-Nelson which are the subject of this sub-programme. There are two rules:

- A 'maintain the gains rule' - to safeguard prior control and investment; and
- A 'good neighbour rule' (GNR) - for boundary management of pest conifers that prevents an occupier's inaction on control work impacting their neighbour.

Specific rules applicable across parts of the region (as listed below):

- Mt Richmond Wilding Conifer Management Unit;
- Takaka Hill community project;
- Abel Tasman National Park (ATNP) - Project Janszoon; and
- Golden Bay (including ATNP Halo) - Project De-vine.

Over the duration of this Plan, within the above operational areas under current management, in the Tasman-Nelson region (as shown in Maps) and prior to cone bearing:

- d. Occupiers must destroy any pest conifers on their land where the property is located within one of the four named operational areas that has received prior control, or there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement. This rule does not imply any obligations on occupiers of planted forests of species not listed as pest conifers and does not apply until a property has received initial and maintenance control, as described above.
- e. Occupiers within any of the four named operational areas must destroy any pest conifers on their land within 200m of an adjoining property boundary, where the adjoining property has previously been cleared of pest conifers through prior control and the adjoining occupier is also taking reasonable steps to control pest conifers within 200m of their property boundary. This is a Good Neighbour Rule (GNR) and will apply unless there is a negotiated agreement in place between the Management Agency and occupier as an alternative way to achieve this requirement.

A breach of any of the above rules is an offence under Section 154(N)19 of the Act.

Explanation of the Rules

The purpose of these rules is in accordance with sections 73(5)(h), as outlined below:

- *Rule (a) places a general obligation on relevant occupiers to remove any pest conifer to prevent new infestations occurring. The principal objective is to provide the Management Agency with powers allowing it to focus on land which is ostensibly clear of wilding conifers to remain clear. Although the majority of wilding conifer spread is predictable, a characteristic of spread (particularly in highly susceptible areas) is also the occurrence of random, irregular, long distance spread into areas previously unaffected. This rule*

⁶ The level of control received will be proportionate to the infestation size and density and other factors such as seed banks.

provides an early intervention trigger for vulnerable or susceptible areas. Exemptions may be sought under s. 78(2) of the Act (e.g. for protected 'specimen' conifer trees named in District Plans made under the Resource Management Act).

- *Rule (b) aims to ensure that forestry occupiers (of both plantation and permanent forests) are liable for (to pay and/or control) any new wilding spread of conifer seedlings from their forests onto immediately neighbouring land, from 1 July 2024 onwards, with the proviso that the land adjoining the planted forest was free of wilding conifers at this date. It is unreasonable for affected occupiers adjoining planted forests to have to clear wildings and/or pay for this control work (i.e. the 'exacerbator pays' principle). Implementation of this rule is based on the opinion of an appropriate council officer and must be backed with proof of spread occurring. The rule only applies where the adjoining occupier (making the complaint) is making reasonable attempts to keep their land clear of wilding conifers.*

A four-step process is followed to enact the rule:

Step 1: Complaint received by council.

Step 2: Complaint investigated by an appropriate Authorised Person (with powers of entry) to validate complaint.

Step 3: Meeting held between the parties to engage with them and to reach a negotiated agreement.

Step 4: If no agreement can be reached, RPMP enforcement provisions may be enacted.

A negotiated agreement between the forest occupier and adjoining occupier (and validated by the Management Agency) will be a binding way to meet this rule requirement, e.g. that the agreement documents which party will undertake and/or fund the required control, over what time period and what the access agreements are to carry out control work.

- *Rule (c) is a 'pest agent conifer rule' which aims to prevent wilding conifer establishment across property boundaries principally through the control of conifer woodlots and shelterbelts (under 1 hectare in size) or individual trees that are determined, in the opinion of an authorised person, to be genuine sources of seed spread. The same 'evidence' criteria from rule b applies. This rule is triggered by a complaint made by a neighbour to the Management Agency, and that person must be taking reasonable steps to control pest/wilding conifers on their property. 'Reasonable steps' definition from rule b also applies.*
- *Rule (d) is about 'maintaining the gains' of prior control work to ensure that the benefits of this control are not lost through inaction (or for any other reason) by any occupier. 'Prior' means any work underway from 1 January 2016 (when the national programme commenced) to the present day. 'Control' means any work funded all or in part through formalised or planned programmes (e.g. national, regional or local operations including environmental trust led initiatives, and as deemed valid by the Management Agency). This definition extends to include individual private property control programmes, on a case by case basis. 'On their land' refers to any property located within one of the mapped operational areas, provided there has been control undertaken on that property. The obligation applies anywhere on that property (hence a property wide obligation).*

- *Rule (e) is a 'good neighbour rule' designed to protect an occupier who has been taking reasonable steps (e.g. control work using best practice) on their property and is being impacted by pest conifer infestations on a neighbouring property (e.g. through inaction or unsatisfactory/incomplete control). The 200m distance is based on science that notes the majority of conifer seeds fall within this space from source trees. In practicable terms this is the only way to bind the Crown to meet its RPMP obligations, however the GNR is not limited in only applying to Crown land. A GNR generally seeks to manage the externality impacts arising from pests spilling over from one property to a neighbouring property that is free of, or being cleared of that pest.*

Alternate options:

1. Do nothing – however, in every other region where work is undertaken under the National Programme, wilding conifers are included in the relevant RPMP. This is because without their inclusion, and without rules, there is no compulsion on occupiers to maintain any of the gains made to date.
2. Eradication is not feasible. A Sustained Control Programme, while containing the same rules as Progressive Containment, does not address the overall goal sought of wildings management, being the control of spread then progressively pushing back infestations to source areas then controlling those source areas (in the long-term).



Figure 4: Current operational area in the Mt Richmond Wilding Conifer MU. Legacy plantings of contorta and mountain pine on Beebys Ridge (right) are to blame. Control was commenced by DOC in 2018. Further control is scheduled for 2023/24. Photo source: BBSL, November 2023.

RPMP edits required:

Add principal measure 'd.' to Progressive Containment Pest Programme (pg 40):


d. Tasman-Nelson pest and wilding conifer management programme: Both councils have a leadership role in facilitating collaborative on-the-ground management of pest and wilding conifers. Major components of this approach will include providing support as a partner (e.g. this may include: co-funding, technical support, assistance with developing long-term control plans, ensuring occupiers have access to the tools and equipment required and using its regulatory powers) and actively supporting a variety of community-led initiatives. The outcomes of the programme will be heavily reliant on the sustained implementation of current and future operations through equitable regional and national funding. While some local/regional funding for control operations is likely to continue, the programme will become increasingly dependent on the National Wilding Conifer Control Programme (NWCCP). This is a collaborative nation-wide control approach and funding model for wilding conifer management. Significant joint Crown funding for control work, from the Ministry for Primary Industries, Department of Conservation and Land Information New Zealand, came into effect in 2016 but the programme requires ongoing Crown funding and occupier support to continue (including on Crown occupied land). Work to control pest and wilding conifers may also occur outside current operational areas should it be prioritised and resourced through agreements between the various parties involved.

- Add new progressive containment programmes / rules as outlined above.

NOTE: The information presented on the maps is prepared for indicative use only and is not intended for definitive legal, location, or formal reference purposes. If required, current and accurate maps of boundaries can be supplied if and as required. Also note that the formatting and numbering of the maps may change as a result of alignment with the map series in the existing RPMP.

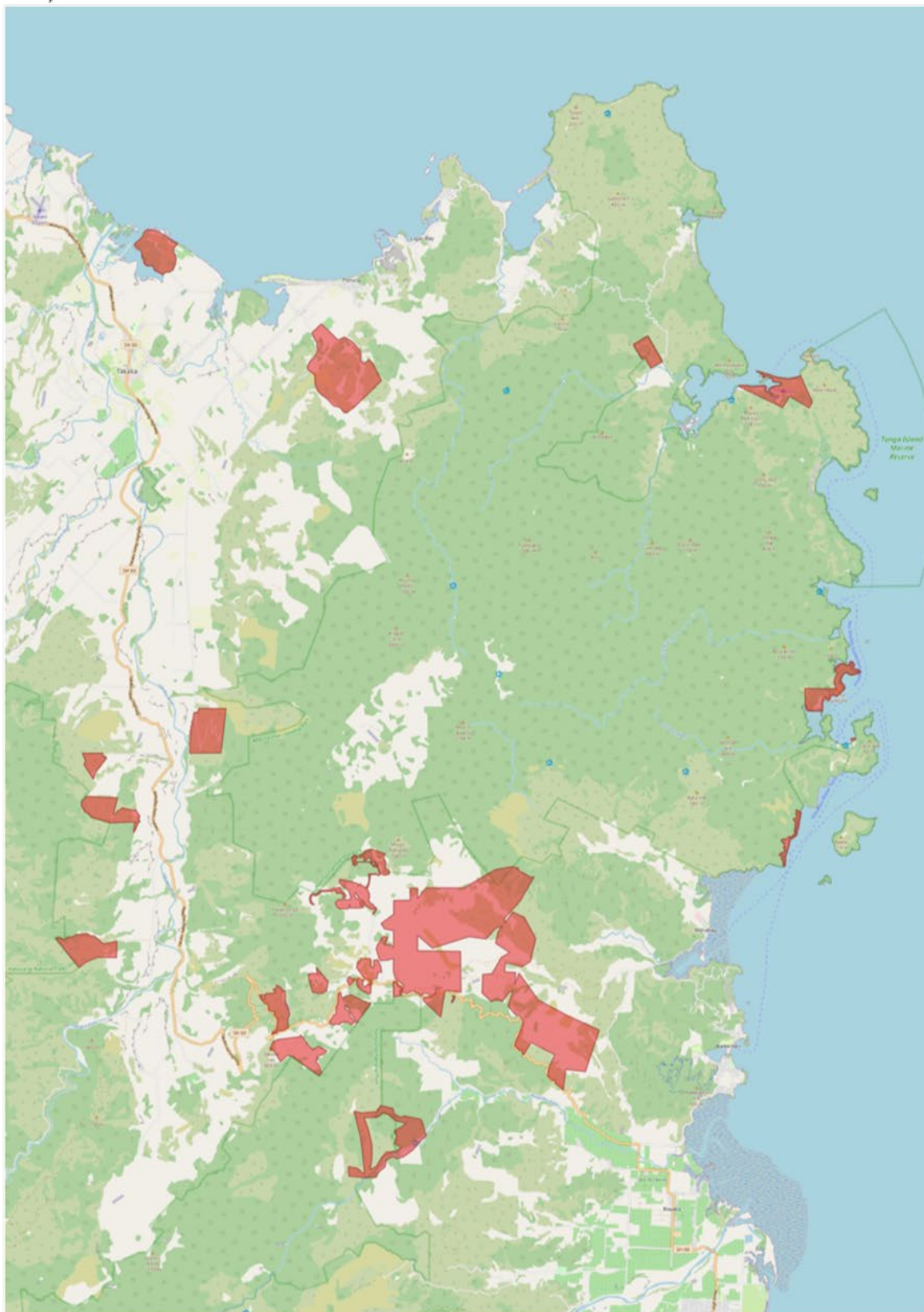
Regional Pest Management Plan



 Pest Conifer Progressive Containment Area

 Map 4

Mapped Area: Takaka Hill Community Project, ATNP (Site-led area), and ATNP Halō (Project De-Vine)



Map background courtesy of OpenStreetMap and its contributors

Regional Pest Management Plan

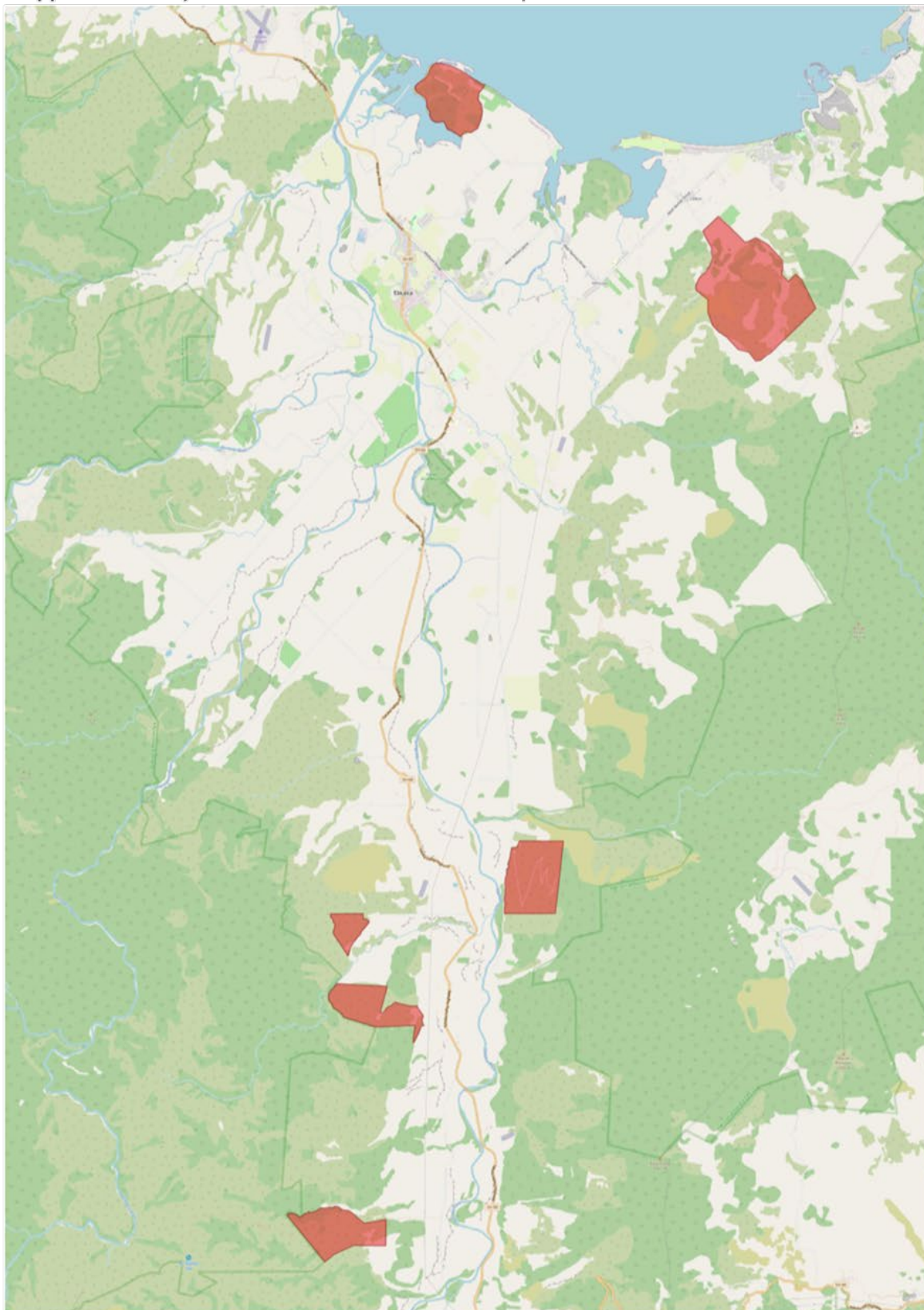


 Pest Conifer Progressive Containment Area



Map 4.1

Mapped Area: Project De-Vine Environmental Trust Operational Area



Map background courtesy of OpenStreetMap and its contributors

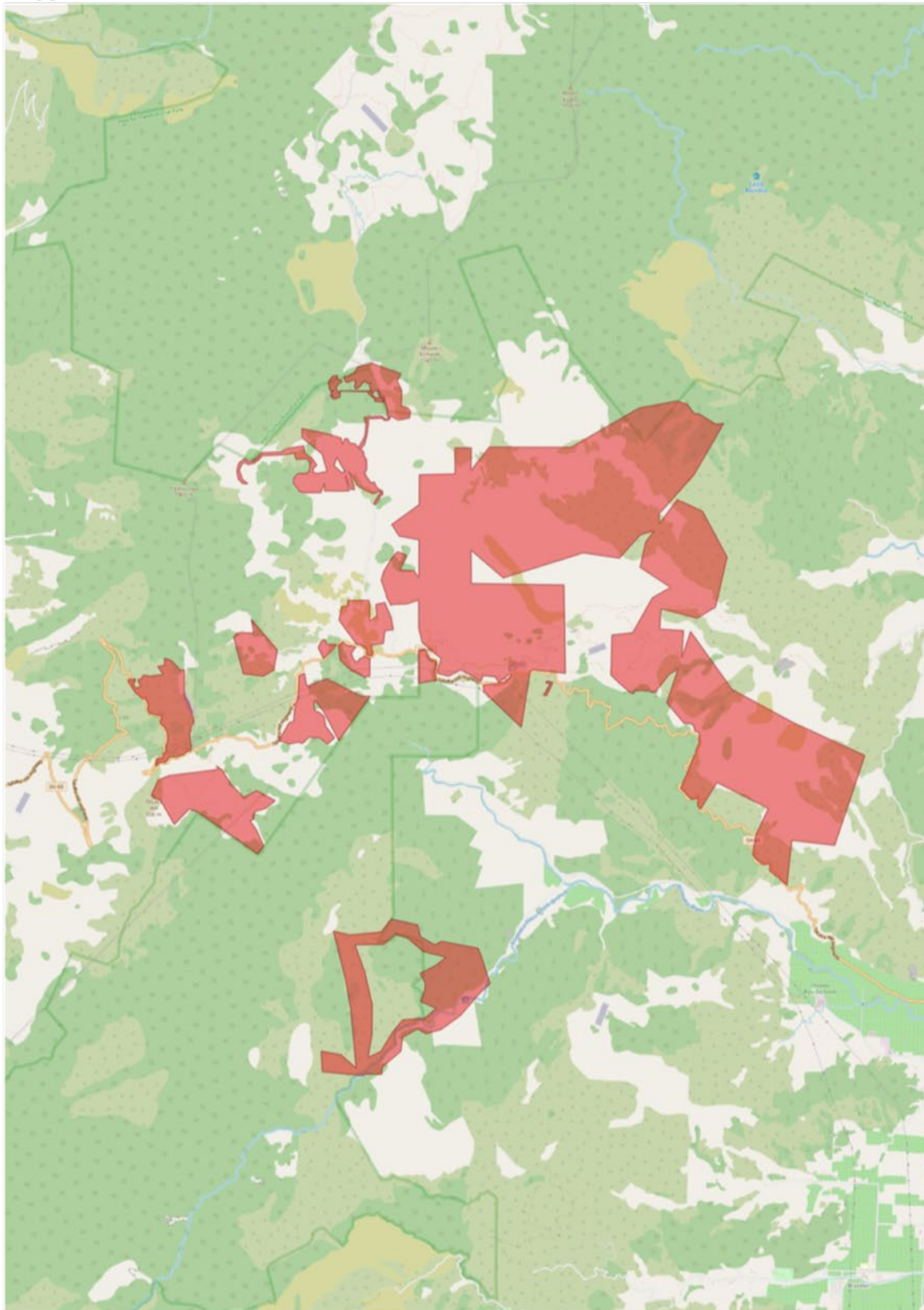
Regional Pest Management Plan



 Pest Conifer Progressive Containment Area




Mapped Area: Takaka Hill



Map background courtesy of OpenStreetMap and its contributors

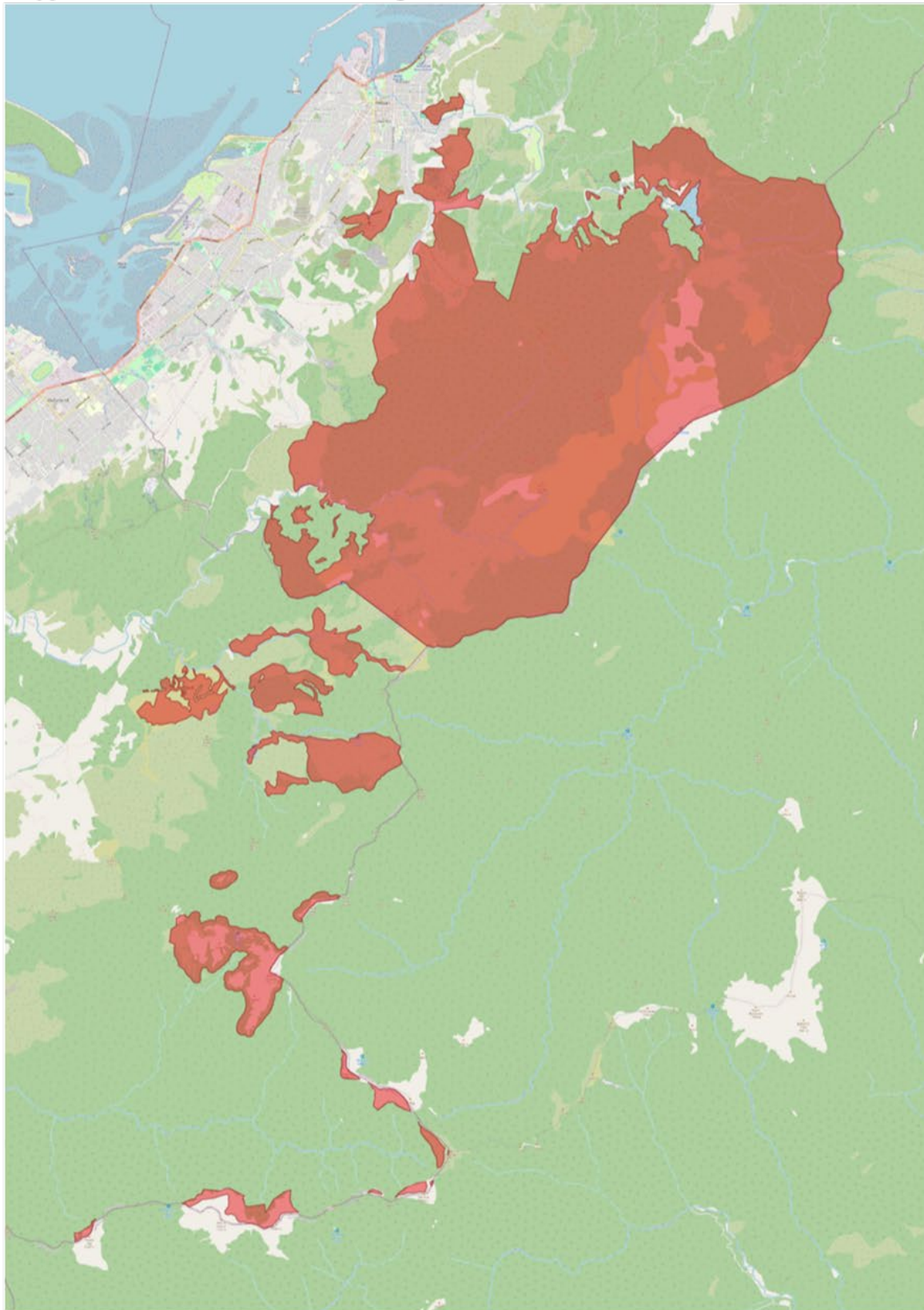
Regional Pest Management Plan



 Pest Conifer Progressive Containment Area



Mapped Area: Mt Richmond MU – Roding and Nelson



Map background courtesy of OpenStreetMap and its contributors

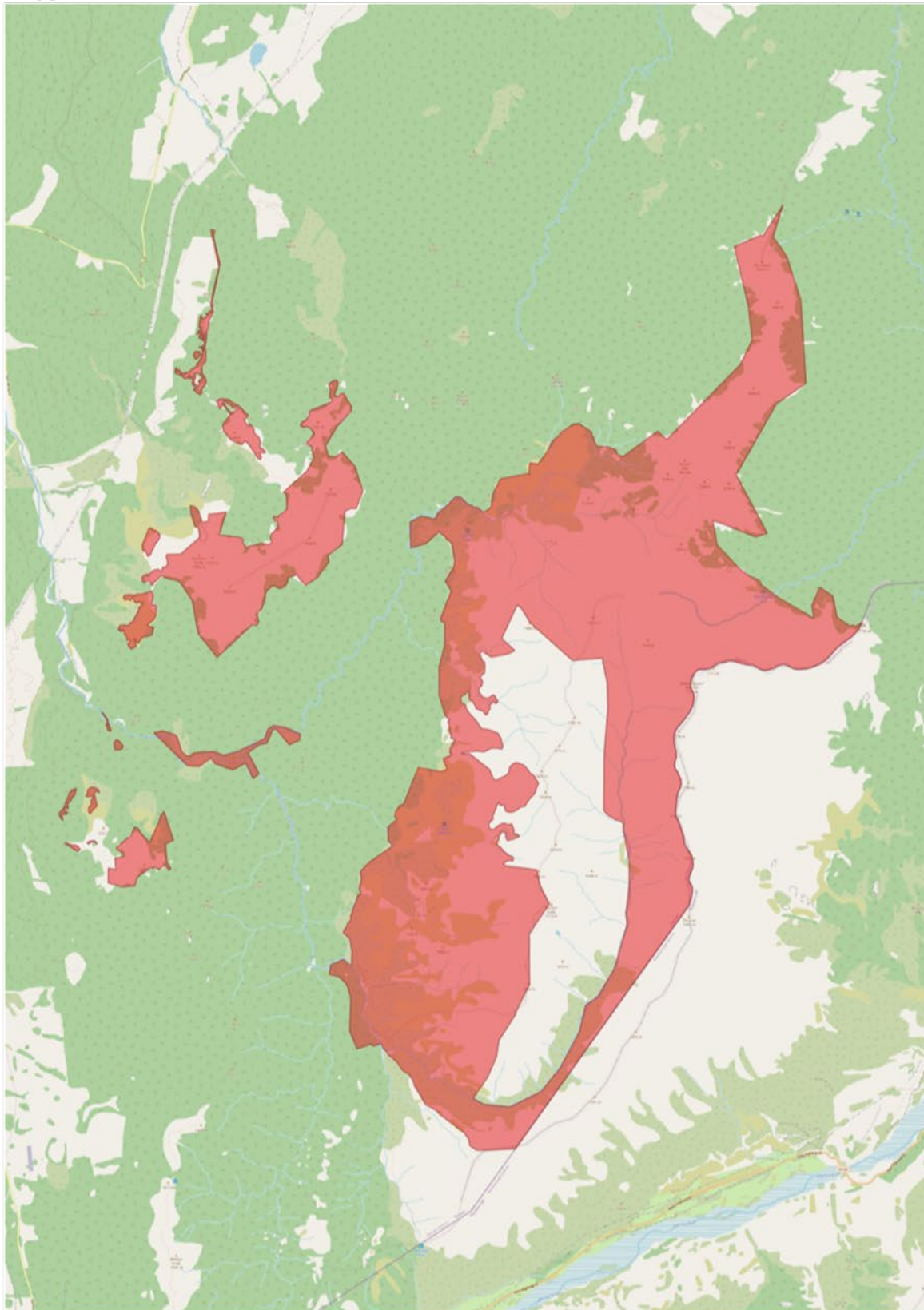
Regional Pest Management Plan



 Pest Conifer Progressive Containment Area



Mapped Area: Mt Richmond MU – Red Hills



Map background courtesy of OpenStreetMap and its contributors

Summary of Submissions and Staff Analysis

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



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1. Introduction to report

On 23 February 2023 Tasman District Council and Nelson City Council, together, notified a Partial Review (the Proposal) of the Tasman-Nelson Regional Pest Management Plan (RPMP) for public comment. A total of 100 submissions were received by the closing date of 28 March 2024. One written submission was received after this date. A public hearing was held by the Regional Pest Management Joint Committee, with representatives from both Councils, on 27th May 2024.

This report is, firstly, a summary of submissions made. It summarises all submission points on the Proposal, in tabular form, and presented in the order of the proposed programmes as written in the Proposal. The main threads of the submissions have been captured verbatim. However, while the authors have sought to represent each submission as faithfully as possible, a degree of interpretation and abridgement is unavoidable. Therefore, this document should be treated as a guide to submissions and does not replace referring to the full submissions if necessary. The full submissions were supplied as part of the hearings report on 27 May 2024.

To assist the Joint Committee's understanding of the key matters, staff recommendations and supporting comments are presented against each submission point made. These recommendations are reflected in the deliberations report.

2. Submission analysis and recommendations

Submitter's name	Sub. point ID	Summary of Submission (and decision requested)	Staff recommendation (including comments)	RP MP Joint Committee Recommendation
1. Overall comments				
Pamela Pope	n/a	<u>Pest plants general</u> - I highly agree that the above Plan needs to be amended and more comprehensively than is currently being proposed. I am of the opinion that both councils have been 'sleeping on the job' for years while the many pest plants spread all over the District. Some on private land, some on NCC Road reserves etc. Maybe it's high time for more education on these species, which is sadly lacking. The following is a list of species easily found on the hills around Nelson and Tasman, most of them are on the National Pest Plant Accord which means they are banned from sale, distribution or propagation (<i>a list of 20 pest plants are included as examples</i>), of which agapanthus, fan palm and creeping fig have been, sadly, actively planted by NCC.	The requested species are outside of the scope of the current Terms of Reference for consideration by the Joint Committee. The issues/pests noted would more correctly be considered at the full review of the RPMP during 2027/28. TDC and NCC do not have the resources available to tackle the many widespread weeds listed, nor is it likely that some of these pests would 'pass' the cost benefit analysis (CBA) process as set out in the legislation. Regarding education, again both councils are actively engaged in this space, operating within confined budgets.	
Pamela Pope	n/a	<u>Hedgehogs</u> - we need to pay more attention to this problem. Also, as they carry toxoplasmosis and cause massive biodiversity loss. Skinks, geckos and ground nesting birds don't stand a chance with hedgehogs around.	The requested species are outside of the scope of the current Terms of Reference for consideration by the Joint Committee. The issues/pests noted would more correctly be considered at the full review of the RPMP during 2027/28. It is acknowledged, however, that hedgehogs can have significant biodiversity impacts especially in coastal bird nesting areas.	

<p>Forest and Bird – Golden Bay Branch</p>	<p>n/a</p>	<p>Thank you for the opportunity to submit on the Tasman Nelson RPMP. Current animal and pest plant management undertaken by Forest and Bird in Golden Bay focuses on the coastal environment. Our priority is to provide protection and suitable habitat for our ground nesting and roosting shorebirds and seabirds - through E TORU NGA AWA: KO TAKAKA, KO MOTUPIPI, KO ONAHAU – The Three Rivers project.</p> <p>The following three points are submitted:</p> <ul style="list-style-type: none"> • The Tasman Nelson Pest Management Plan has no identified sites in its Site-led programme in Golden Bay. We are asking Council to include E Toru Nga Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers project area in the Plan as part of its Site-led pests programme. • We are asking Council to include two additional animal species in their list of animal pests in the Tasman Nelson Regional Pest Management Plan – the European hedgehog (<i>Erinaceus europaeus</i>) and the European Brown Hare (<i>Lepus copenus europaeus</i>). • Forest and Bird are requesting marram grass (<i>Ammophila arenaria</i>) is a notified pest plant in E Toru Nga Awa: Ko Takaka, Ko Motupipi ,Ko Onahau – the Three Rivers site. Eradication of marram grass in the Three Rivers site would free up valuable nesting and roosting space. Nesting and roosting birds would no longer compete for space. Existing native vegetation, sand convolvulus, native spinach and sand carex would be able to flourish. 	<p>While the work of the Golden Bay branch is admirable and TDC fully supports the project and the concepts, this request is outside of the scope of the current Terms of Reference for consideration by the Joint Committee.</p> <p>Staff will note this request for consideration for the full review of the RPMP during 2027/28.</p> <p>While the site-led programme does not include Golden Bay, there are a number of species within the RPMP sustained control programme that are specific to Golden Bay including banana passion vine, climbing asparagus, old man’s beard, wild ginger, and woolly nightshade</p>	
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Cynthia McConville and	19680	I am writing in support of the Forest and Bird submission on the TNRPMP. Specifically the inclusion of the Three Rivers Project area as a site-led programme and the inclusion of feral cats in Golden Bay, European hedgehogs and European brown hares in the revised plan. I have seen the impact these animals have on our coastal shorebirds and seabirds at sites where they roost and nest along our coastline.	<i>Note: The Golden Bay cat request has been copied to feral cat section for a separate response.</i>	
Patrick Steer	19742	We would like to see council take more action to support our coastal bird population through greater pest control. Specifically include the coastal area between Motupipi, Takaka and Onahau Rivers in Golden Bay - this is an internationally important area for coastal birds that has no protection from multiple plant and animal pests.	<p>This request is outside of the scope of the current Terms of Reference for consideration by the Joint Committee</p> <p>Staff will note this request for consideration for the full RPMP review during 2027/28.</p> <p>It is acknowledged that <u>hedgehogs</u> can have significant biodiversity impacts especially in coastal bird nesting areas. <u>Hare</u> are generally seen as having 'nuisance value' rather than severely affecting biodiversity production values.</p> <p>Regarding the Three Rivers Project area as a site-led programme, the concept has merit but needs to be presented at time of full review for TDC to consider the costs and benefits, including any obligations on landowners.</p>	
Robyn Jones	19682	I would like to support the Forest and Bird Golden Bay Branch submission to the Tasman Nelson Regional Pest Management Plan.	Submission acknowledged.	

The Ornithological Society of New Zealand – Tasman-Nelson region	n/a	Garnering public support for the Pest Management Plan. To achieve this, the Plan needs to be credible and appropriately communicated. We were very disappointed with the sensational fearmongering that accompanied the report of a rook sighting in Stoke in 2023. Material posted on Facebook by Council included unsubstantiated comments regarding Rooks preying on 'native species, including small ground nesting birds and their eggs'. Stuff subsequently claimed that 'There have been reports of them pecking out and eating the eyes of living sheep and lambs that were immobilised.' In correspondence with your staff no reports of such behaviour were forthcoming despite us being advised that 'While the attacks are mostly carried out by crows and ravens, magpies and rooks have also been observed attacking lambs' – our own literature review also failed to find any reliable records of such behaviour. Such unsubstantiated 'information' detracts from the value and importance of the Management Plan in supporting biodiversity conservation.	This submission point is acknowledged.	
Allen Berthelsen	19825	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.	Support is acknowledged.	
Cam Carter	19824	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.	Support is acknowledged.	
Anna Berthelsen	19823	I think it is very important to have robust pest management to protect our native biodiversity and therefore I am very supportive of the additional inclusions to the plan.	Support is acknowledged.	

<p>Brook Waimārama Sanctuary</p>	<p>n/a</p>	<p>Key pests for biodiversity restoration in the Nelson district don't just include ungulates – grazing animals such as goats, deer, pigs and possum, but include plants such as wilding conifers, vines like Old Mans Beard and certain insects like Vespula (German) wasps. We would like to highlight emerging pests like cats as being part of an effective pest management plan. We support a tougher stance upon cats, see specific notes below.</p> <p>For all pests control we would support strongly that early control is both easier and cheaper to achieve planned outcomes. We would have hoped more pest control be set across at least the Nelson district.</p> <p>We have considered the draft NCC long term plan in conjunction with the proposed pest management plan and are concerned about the long-term plan including;</p> <ul style="list-style-type: none"> • Despite the natural environment being the first point listed in key community outcomes, there appears very little direct spending in the next 10 years for conservation. • Big savings in weed control- see page 87 of the activity's summaries. We see the growing weed problem across the district as serious, and only going to get worse if it is not controlled. This real threat to the NCC budget will only catch up with NCC later with even more cost and resources needed to achieve control to acceptable levels. This is a bad decision to cut spending on pest control. 	<p>This submission point is acknowledged.</p> <p>The matters are outside of the role of the RPMP Joint Committee, but are of relevance to strategic pest planning.</p>	
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DOC	n/a	<p>Overall, the Partial Review is aligned with the National Policy Direction (NPD) and guidance material.</p> <p>I support the proposed amendments to the Regional Pest Management Plan (RPMP), subject to the specific comments set out in Attachment 1 to this submission.</p>	<p>The support is acknowledged. The submission addresses specific sections of the Proposal which are captured against each subject pest.</p>	
2. Sections 1, 2 and 3 comments				

DOC	n/a	<p>Whilst the RPMP has a particular statutory function and purpose, and must be prepared in accordance with the Biosecurity Act and NPD, it is desirable that it also:</p> <ol style="list-style-type: none"> 1. has clear strategic intent and SMART objectives (specific, measurable, achievable, relevant and time-bound); 2. supports current strategic (regional and cross-regional) initiatives and programs for the restoration, protection and enhancement of indigenous biodiversity; and 3. supports initiatives and programs that are currently in development, e.g. under the Kotahitanga mō te Taiao Strategy; and other collaborative landscape-scale projects that may be progressed during the period of the RPMP. <p>These matters are relevant to the RPMP as a whole and to the proposal to include new pests and policies through this Partial Review.</p> <p>Whilst to a large extent the strategic initiatives and programs in (2) and (3) will depend on voluntary collaboration between partner organisations, landowners and the wider community, the RPMP can provide further strategic direction and a regulatory backstop to support the delivery of programs on the ground.</p> <p>The choice of management programme – and the specific objective – should be informed by the values to be protected or at risk, the pests that impact on the values, the area affected (or potentially affected), the level to which the pest must be controlled to manage impacts to an acceptable level, and an analysis of the benefits and costs that satisfies the requirements of the NPD.</p>	<p>The context is acknowledged. The submission addresses specific sections of the Proposal which are captured against each subject pest.</p>	
<p>3. Proposed amendments – pest plants</p>				

4.3.1 Blue passion flower				
Alistair Kwan	17981	You'll need to conduct education and to resource action by occupiers. Many people are not capable of removing the plant (e.g. where it grows in a hard-to-reach area and occupier is physically frail) and is similar to how old man's beard is allowed to flourish in many back yards. There are also many who value blue passionflower for its fruit; there is a need for more of us to understand what a burden this species imposes on other species and on the ecosystem more broadly. An education campaign could be coupled with Council projects to eradicate the plant from public recreation lands to promote the spirit of collaboration.	Accept submission, noting that the blue passion flower does not have a valued fruit and is being confused with passionfruit. Any change in policy, or new policy introduced, needs to be implemented along with practical education and advocacy actions. This promotion will take different forms, including for example new factsheets online, discretionary control by officers where occupiers physically cannot do the work and wider dissemination through the councils' newsletter networks. No change required to policy wording.	
Jeremy Taylor	18044	As this is readily confusable with other passionfruit plants, especially the flower as shown in this communication, the actual basis for identification needs to be communicated well. On that basis as well, the requirement to report sightings should be within five working days of the plant's *identification* rather than *sighting*.	Agree in part. We are conscious of misidentification with other passionfruit species so identification features are detailed in public communications. The suggested change won't have any practical effect on measures to control this plant.	
Alison Couldrey	18514	Absolutely remove and require land owners/gardeners to destroy.	Support is acknowledged.	
Phil Allan	18523	Ideal.	Support is acknowledged.	
Paula Blair	18726	I think it is all very well proposing change to include the eradication of these species when you can't even control the basics, you spend all this money on planting lovely natives only to have them choked out by old man's beard. If you can't control this how on earth are you going to manage the rest. We can't keep leaving this all to the next generation to pick up.	Agree in part. The difference between this pest and old man's beard is that there is a chance to get on top of blue passion flower while its extent is still limited unlike old man's beard which has run rampant in numerous parts of the region for many years.	
Peter Williams	18857	Worth having a crack at it.	Support is acknowledged. The councils believe they can get on top of this pest before it spreads much further.	

Myffie James	18962	I am all in for controlling as many of the pest weeds as possible, engaging with the local community and even having weed busting teams to support even more work being achieved.	Support is acknowledged. The councils encourage 'weed buster' type groups to work in jointly and there are many successful operations run by community groups. BPF is likely to be a mix of occupier control and some community led work on public reserves, to supplement council efforts.	
Robert Schadewinkel	19194	Strongly support the proposed plan rules. To tackle an emerging pest is best practice in biosecurity - time is of essence and early action will save millions of dollars later.	Support is acknowledged.	
Henry	19195	I strongly support this proposal. I work as a weeder at the Brook Sanctuary and do not wish to add any more voracious weeds to our repertoire.	Support is acknowledged.	
Stephen Lavery	19213	Eradicate.	Support is acknowledged.	
Peter Rigg	19216	Get rid of it. We have a number of climbing vines causing havoc like Old Man's Beard and we do not need another problem plant.	Support is acknowledged.	
Trevor James	19264	While beautiful, it has to go.	Support is acknowledged.	
Bruce Mutton	19335	I support the proposal.	Support is acknowledged.	
Jane Stevens	19369	I agree that blue passion flower should be included in the list of pest plants. It could become as difficult to control as Old Man's Beard if allowed to spread unchecked. Landowners who have it growing on their property will need information and support to identify it and get rid of it. NCC will need to step up pest control on the Grampians to make sure that council land isn't a continuing source of re-infection for neighbouring properties. I live in Bishopdale and I frequently find OMB seedlings growing in my garden, no doubt from uncontrolled plants on the Grampians, or other NCC land.	Support is acknowledged. Any new policy introduced needs to be implemented along with practical education and advocacy actions. This will take different forms, including factsheets online, including discretionary control by officers (where occupiers physically cannot do the work). No change required to policy wording.	
Mike Orchard	19451	Appropriate, the blue passion flower is definitely spreading in the areas identified and should be controlled for eradication.	Support is acknowledged.	

Alison R Pickford	19461	Yes, get rid of it asap.	Support is acknowledged.	
David	19484	I agree with the proposed plan, sounds sensible to eradicate while only in a small area.	Support is acknowledged.	
Lisa Black	19491	Seems very sensible	Support is acknowledged.	
Matt	19726	Sensible approach. Get it early.	Support is acknowledged.	
Fiona Ede	19766	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	Support is acknowledged.	
Chris Ecroyd	19780	I think it is a good idea to try to eradicate this plant and will report any plants I see onto the iNaturalist website.	Support is acknowledged.	
Robert	19805	Fully agree. Early intervention is the most cost/resource effective approach.	Support is acknowledged.	
Brook Waimārama Sanctuary	19818	Support. Fully agree. Early intervention is the most cost/resource effective approach.	Support is acknowledged.	
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports eradication for the whole region.	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change.	Support is acknowledged.	
4.3.2 Boneseed				

Alison Couldrey	18515	Remove/require land owners including gardeners to destroy. May need some advice and help to be offered/ given. Will need follow up.	Accept. Occupier control is the prime purpose of the amended policy. Any new policy will be implemented along with practical education and advocacy actions. This will take different forms, including factsheets online, including some discretionary control by officers (e.g. where elderly occupiers cannot physically undertake control). No change required to policy wording.	
Henry	19199	Strongly support	Support is acknowledged.	
Trevor James	19265	We can eradicate this!	Agree in part. Because of the steep nature of some Port Hills infested land, it is anticipated that a few areas will be unable to be controlled due to unsafe access, thereby jeopardising eradication aspirations. Technology, however, is always developing and drones may be able to be used with greater success. The ultimate goal would be eradication, depending on access issues being overcome.	
Bruce Mutton	19336	I support the proposal.	Support is acknowledged.	
Jane Stevens	19370	I agree with this proposal. As you recognize in your summary, some of the areas where boneseed grows are difficult to access, whether they are on private or public land. Land owners will need information and support to identify this plant and try to control it on their properties.	Support is acknowledged. NCC officers have an array of information to support occupiers, including providing one-on-one advice. In some cases control may not be possible due to health and safety concerns at the site. Technology adaptations (e.g. drones) may help overcome these issues.	
Mike Orchard	19453	I disagree with partial control proposal. Boneseed support for steep cliffs could be substituted by other species. Likewise there is pampas on the steep cliffs - this is noticeably spreading too.	Decline relief sought. At the current infestation levels eradication of boneseed is not considered feasible and health and safety issues will govern just how much control can be undertaken and where. Regarding pampas, unfortunately the 'horse has long bolted' on doing any meaningful control, apart from at specific manageable sites. Even then there will always be reinvasion potential due to propensity of seed dispersal by wind. Biological control agents for pampas are the hope but this approach seems a long way off yet.	

Joan Corry	19480	I support including boneseed in the plan so you can get rid of boneseed. because it is very invasive and has covered a lot of Wgtn hills (where I have lived) and could do the same here.	Support is acknowledged.	
Matt	19728	Control in this area for Council alone seems tough due to dense population and steep terrain. Good approach.	Support is acknowledged.	
Chris Ecroyd	19781	More widespread control of this plant should be considered. The Port Hills site is certainly a very good habitat for the species and hopefully it will not establish as well elsewhere.	Agree in part. Because of the steep nature of some Port Hills infested land, it is anticipated that a few areas will be unable to be controlled due to unsafe access, thereby jeopardising eradication aspirations. Technology, however, is always developing and drones may be able to be used with greater success. The ultimate goal would be eradication, depending on access issues being overcome.	
Fiona Ede	19767	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	Support is acknowledged.	
Forest and Bird National Office	n/a	Forest & Bird would prefer eradication but supports sustained control of Boneseed on the Port Hills area, given the constraints the councils face, in order to achieve eradication elsewhere in the region.	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change.	Support is acknowledged.	
4.3.3 Moth plant				

Alison Couldrey	18516	Remove, require land owners including gardeners to destroy. May need some advice and help to be offered/ given. Will need follow up. Make it a notifiable pest plant.	As an eradication pest the responsibility for removal will fall to Council staff/contractors, working with landowners, to ensure complete removal of the plant. Any new policy is implemented with practical education and advocacy actions. This will take different forms, including factsheets online and newsletters / fliers to occupiers in areas where plants are found. Moth plant will be a notifiable pest, to NCC/TDC, by virtue of the rule included in the proposal. No change required to policy wording.	
Henry	19200	Strongly agree.	Support is acknowledged.	
Trevor James	19266	I support eradication.	Support is acknowledged.	
Bruce Mutton	19337	I support the proposal.	Support is acknowledged.	
Jane Stevens	19386	I support the proposal to add moth plant to the list of pest plants. People living in areas where it is currently found, and adjacent areas, will need education and information if they are required to report sightings.	Support is acknowledged. As noted above, any new policy is implemented with practical education and advocacy actions.	
Mike Orchard	19454	Agree - proactive control of emerging pest plants is critical.	Support is acknowledged.	
Matt	19729	Great approach. Get rid [the pest plant].	Support is acknowledged.	
Sarah	19750	Agree	Support is acknowledged.	
Fiona Ede	19768	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	Support is acknowledged.	

Chris Ecroyd	19782	This species is not common or well established in the region from what I have observed and it would be best to keep it out as far as possible. Any records I see will be put onto the iNaturalist website. So far, I think I have only seen it at one location and it was removed from that site.	Support is acknowledged.	
Robert	19808	Agree	Support is acknowledged.	
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports eradication for the whole region.	Support is acknowledged.	
Brook Waimārama Sanctuary	n/a	Agree	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change.	Support is acknowledged.	
4.3.4 Pampas grass				
Alison Couldrey	18517	Require removal of all species. I noticed it in Westhaven recently.	Support is acknowledged. The Westhaven Inlet and surrounding area is covered by this proposed rule.	
Rod Barker	18997	There needs to be a region wide strategy and plan to eradicate pampas grass and other invasive weeds, and TDC needs to lead actions on this using a catchment by catchment approach.	The cost/benefit analyses, consultation and deliberations leading up to the 2018-19 RPMP decision identified that regional sustained control is not cost beneficial. However, RPMP rules are not required to enable landowners and catchment groups to tackle pampas at catchment level and this effort is encouraged.	
Manu Danner	19098	Please include both pampas species in the whole region. It is popping up everywhere.	Decline relief sought. The cost/benefit analyses, consultation and deliberations leading up to the 2018-19 RPMP decision identified that regional sustained control is not cost beneficial.	

Sally Quickfall	19126	I would like to see the Rangihaeata headland and coastline between the headland and the Takaka River included as this is also an area that where pampas could be easily eradicated, with minimal ongoing work to keep it at bay.	Decline relief sought: There may be localised areas where pampas is eradicable. However, at this time there is insufficient data to identify these infestations well enough to undertake the required cost efficiency analysis.	
Henry	19196	I strongly support this proposal. Pampas is a horribly invasive plant.	Support is acknowledged.	
Sarah Douglas	19224	The areas of control could be widened by asking all landowners to eradicate it when it's on their property. I live in the Motueka Valley and have noticed the increase this year of this plant but it is only 4 between Alexander Bluff Bridge and Motueka so could easily be eradicated.	Decline relief sought: There may be localised areas where pampas is eradicable but these areas need to be taken into consideration in the context of infestations in the surrounding landscape.	
Trevor James	19267	We have to eradicate pampas and then try hard to keep this out of Mohua.	Support is acknowledged. However, due to the extent of the infestation, eradication over the whole of Mohua/Golden Bay may not be cost-beneficial.	
Bruce Mutton	19338	I support the proposal	Support is acknowledged.	
Jane Stevens	19387	I support this proposal. Pampas is a very invasive plant and difficult to get rid of once established.	Support is acknowledged, while noting that pampas is widespread through much of Tasman-Nelson.	
Erin Hawke	19460	Could you expand the control area to include Council owned road verges.?	Agree in part. Within the designated areas where the rule would be implemented, all occupiers of land would be legally obliged to control pampas. This does not mean that TDC will control pampas on road verges outside the two proposed Golden Bay sites, (other than, for example, road safety reasons).	

Bruce Struthers	19477	<p>If a plant is a pest, it is a pest everywhere in the District. Restriction of the sustained control area to a subset of the District has not been justified, and is a bit silly. Nor has an adequate distinction between native toetoe and the non-native species been provided on this web site. Is the photograph on the right of the clearly purple-tinged plant toetoe?</p> <p>The District should take the high moral ground, and proactively eradicate pests on land that it owns or controls. I would recommend a field visit to the steep walkway joining 167 Stafford Drive (where your Ruby Bay pump station is) to the end of Korepo Road. Whatever the species may be, a large plant with long sharp leaves is growing over the poorly maintained walking path.</p>	Decline relief sought. The cost/benefit analyses, consultation and deliberations leading up to the 2018-19 RPMP decision identified that regional sustained control is not cost beneficial.	
Matt	19730	Sensible approach given the remote location of some sites. Possibly challenging to enforce but NW Golden Bay holds high biodiversity values and this plant must be prevented from spreading.	Support is acknowledged.	
Roger Frost	19763	Support.	Support is acknowledged.	
Fiona Ede	19769	<p>I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum.</p> <p>The group endorses the proposed RPMP rules as they are written.</p>	Support is acknowledged.	
Chris Ecroyd	19783	I think an attempt should be made to control or eradicate these plants over a much wider area. They are increasing along the coast in the region and will cause problems in the future.	Decline relief sought: There may be localised areas where pampas is eradicable. However, at this time there is insufficient data to identify these infestations well enough to undertake the required cost efficiency analysis.	
Robert	19819	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this.</p>	Support is acknowledged. Decline relief sought: There may be localised areas where pampas has been removed. However, at this time there is insufficient data to identify these infestations well enough to undertake the required cost efficiency analysis. The cost/benefit analyses, consultation and deliberations leading up	

		Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.	to the 2018-19 RPMP decision identified that regional sustained control was not cost beneficial.	
Robert	19807	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this.</p> <p>Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.</p>		
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as a named pest and supports sustained control in the Aorere Valley area and Whanganui to Puponga area.	Support is acknowledged.	
Brook Waimārama Sanctuary	n/a	<p>Agree on proposed change. Should have never been removed in the first place.</p> <p>But the plan needs to go beyond the identified sites in the Golden Bay: This is a serious invasive plant and rules need to be flexible so that control from/near valuable areas can be carried out and enforced. The 2019-2029 RPMP needs to allow for this. The BWST keeps pampas at zero densities within the leased Brook Conservation Reserve area but is surrounded by largely NCC administered land with rampant stands of pampas which is not controlled.</p> <p>Change RPMP so that The Good Neighbour Rule applies to all properties adjacent to areas free of pampas or where pampas is controlled to zero densities.</p>	<p>Support is acknowledged. Decline relief sought: There may be localised areas where pampas has been removed. However, at this time there is insufficient data to identify these infestations well enough to undertake the required cost benefit analysis.</p> <p>The cost/benefit analyses, consultation and deliberations leading up to the 2018-19 RPMP decision identified that regional sustained control was not cost beneficial.</p>	
Project De-Vine Environmental Trust	Late	Support the change. SUPPORT THE CHANGE. Project De-Vine ET has maintained a policy of controlling Pampas plants in Golden Bay, when found at manageable infestation levels, before and since Pampas was withdrawn from the RPMP. We have been maintaining Pampas control in the Motupipi River and	<p><i>Note, this submission was received after the closing date.</i></p> <p>Support is acknowledged. Decline relief sought: There may be localised areas where pampas has been removed. However, at this time there is insufficient data to identify these infestations well enough to undertake the required cost efficiency analysis.</p>	

		tributaries catchment areas down to the sea in particular to this level. This area has and still is receiving multi-group support for willow control, planting and RPMP plant species control. Because of Golden Bay's proximity to two National Parks (NPs) and multiple DOC reserves (see attached maps showing that 47% and 79% of all private land in Golden Bay is within 0.5km and 1 km respectively of DOC reserves or NPs) and QEII covenants, Project De-Vine ET would like to see both Pampas species made control plants for all Golden Bay apart from forestry or ex-forestry blocks. Maybe imposing a good neighbour rule around sites of high infestation would slow its spread?	The cost/benefit analyses, consultation and deliberations leading up to the 2018-19 RPMP decision identified that regional sustained control was not cost beneficial.	
4.3.5 Water celery and Vietnamese parsley				
Alison Couldrey	18518	Require removal. Follow up to ensure it is happening.	Support is acknowledged. Well understood parts of the Biosecurity Act and RPMP processes include the powers to inspect and the powers to direct occupiers to undertake work. TDC/NCC officers have robust processes in place for monitoring and follow up.	
Henry	19201	Strongly agree.	Support is acknowledged.	
Bruce Mutton	19339	I support the proposal.	Support is acknowledged.	
Jane Stevens	19389	I support this proposal to add Water Celery and Vietnamese parsley to the list of Pest Plants. At present, water celery can be bought at the local branch of Mitre 10, and possibly other garden centres. I think it would be a good start to contact all local garden centres, explain the risk this plant poses and ask them to remove all stock from sale immediately. I think it would be a good policy to discourage garden centres from stocking any plants that are potentially invasive.	Support is acknowledged. By virtue of the proposal to formally list these plants as pests, they will be banned from being propagated, sold or otherwise communicated to anyone. People knowingly doing this would be in breach of the Biosecurity Act. Council staff actively inspect plant outlets under an MPI Authorisation for NPPA species, and include local RPMP species in their inspections.	
Dave and Kate Prebble	19419	We live close to both Poorman's Stream and Orphanage Stream/Saxton Creek and have seen how these plants rapidly spread smothering other vegetation and clogging up the waterway. We support measures to control these plants.	Support is acknowledged.	

Matt	19731	Good to prevent further invasive plants from getting into waterways.	Support is acknowledged.	
Fiona Ede	19770	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	Support is acknowledged.	
Chris Ecroyd	19784	These plants are growing rapidly and completely blocking some streams in the region. The stream which runs from Hill St parallel to and just north east of Hart Road is now blocked with very dense growth, which could cause flooding when we do eventually get some heavy rain. There are now heavy crop of seed on the water celery in this area. They certainly need to be eradicated before they spread further.	Support is acknowledged.	
Robert	19820	A new emerging aquatic pest plant. Fully agree with proposal. Fully agree. Early intervention is the most cost/resource effective approach.	Support is acknowledged.	
Robert	19806	A new emerging aquatic pest plant. Fully agree with proposal. Fully agree. Early intervention is the most cost/resource effective approach.		
Forest and Bird National Office	n/a	Forest & Bird supports inclusion in the Tasman-Nelson RPMP as named pests and supports sustained control in the absence of effective elimination methods.	Support is acknowledged.	
Brook Waimārama Sanctuary	n/a	A new emerging aquatic pest plant. Fully agree with proposal.	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change.	Support is acknowledged.	

4. Proposed amendments – pest animals				
4.4.1 Feral and stray cats - general				
Jeremy Taylor	18046	Sounds like a good idea.	Support is acknowledged.	
Val Pollard	18054	Awesome! When are you going to start trapping?	Support is acknowledged.	
Val Pollard	19207	This is a fantastic initiative. I read through this several times, but I can't find mention of what is actually going to be done about the cats; presumably they are going to be cage-trapped and then returned to owner if chipped, or euthanized if not chipped, whether feral or stray? Will the traps also catch hedgehogs? It would be awesome if there was going to be a by-catch of another pest!	Site led rules for feral cats in Tasman have been developed to support existing efforts by community organisations. Officers will follow up specific complaints, working with existing people and organisations, rather than start a new trapping programme. Additional work will be set out in the RPMP annual operational plans for future years. For Nelson, putting policies in place around feral and stray cat management (and expectations of occupiers) is the first key step in expanding control work, which would likely commence on public land/reserve areas first and supporting existing initiatives and groups already undertaking trapping work.	
Peter Lucas	18121	As a volunteer involved in the trapping of predator animals in the Abel Tasman National Park, I support the proposal to manage feral and stray cats in the designated areas. I would also support and encourage the development of bylaws for the control of all cats in all areas because feral and stray cats in uncontrolled areas will continually re-infest controlled areas of high conservation value and because the owners of companion cats should be held responsible for the identification (e.g. microchipping) and control of their own animals to prevent then harming protected species.	Support is acknowledged. Opinion on bylaw noted.	
Margot Haley	18547	Funding for the management for stray cats and dogs can be raised by a one-off registration fee for both cats and dogs and annual permits. See the benefits below and how everyone's cats and dogs can contribute financially to biodiversity funds and management plans. https://www.olg.nsw.gov.au/public/dogs-cats/nsw-pet-registry/microchipping-and-registration	Submission is acknowledged. Registration fees and permits are outside of the scope of an RPMP.	

D Lovett	18579	The proposal is a step forward but too limited. Releasing cat anywhere in the Nelson/Tasman area should be illegal. Similarly, action is need against all stray and feral cats if the problem is to be reduced and solved. Mandatory desexing of all cats except registered breeders is needed otherwise unwanted cats will continue to be released presenting an ongoing problem for everyone involved.	Support is acknowledged. Decline relief sought: While the general sentiment of the submission is supported, this partial review process focuses on the management of feral and stray cats in specific sites (site-led). A regional ban on release to the wild would be a pest-led strategy and thus is out of scope. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	
Gillian Pollock	18696	They should be neutered, registered and micro chipped. This is a start but cats know nothing of these things and will continue their wandering ways regardless. All other pet animals are fully controlled usually on the owner's property. Cats should be no different and must also be contained if we are to halt the decline in native species. Above all cats evolved as carnivores and are compelled to kill other animals.	Support is acknowledged. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	
Rod Barker	18998	Cat control measures must include all areas in the region, and they need to ensure that cats are kept under control at all times. There needs to be tighter controls on cat ownership, e.g. desexing, chipping, confined living spaces for cats so they cannot roam freely and attack native species.	Support is acknowledged. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. The management of pet/companion cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	
Helen Spring	19061	I agree with the need to manage populations of feral and stray cats in the above-mentioned areas.	Support is acknowledged.	
Sally Quickfall	19128	I believe all feral cats should be destroyed as practicable, there is no place for them in our natural environment. Therefore, TDC and NCC should be looking at bylaws to ensure all domestic cats are microchips to help with identification of cats that are trapped.	Support is acknowledged. Opinion on bylaws noted.	
Henry	19197	I strongly support this proposal. Feral and stray cats have a severe impact on wildlife. Current control is lacking and thus we ought to implement tighter restrictions.	Support is acknowledged.	

Nick	19205	I think the rules are good but need to go further and include desexing and microchipping domestic cats. Owners should be fined if their cats are found roaming the neighbourhood.	Support is acknowledged. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	
C Newcombe	19210	I think it is long overdue and needs to be done as soon as possible.	Support is acknowledged. Setting the policy foundation is the first step before implementing any action on the ground.	
Margi Creed	19211	The most important thing is that the public is educated about the importance of keeping their cats indoors at least from early dusk till dawn whether they are desexed, microchipped or not. Please clarify rules for cat breeders. Are they allowed to keep un-desexed cats in an appropriate closed cage area and be registered as breeders.	Submission acknowledged. Staff are not aware of cat breeders affected by these proposed site led rules, but will work with individuals on a case by case basis. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	
Karen du Fresne	19214	I think that all cats, apart from those kept indoors, pose a significant risk to wildlife - especially birds, but also lizards, skinks, etc. I read recently with concern accounts in the Spinoff of NZ robin populations which had left Zealandia to breed in an adjoining area being totally wiped out by feral cats - adult birds and chicks. This grim toll was verified by monitoring cameras. If we want bird life to increase in our own vulnerable areas we have to do something about this. I agree with the proposals, but I'd like to know what the two councils propose to do when people report sightings of feral, stray or companion cats in the designated areas. Effective enforcement will be crucial. I also believe that these measures should be accompanied by a hard-hitting public education campaign - using monitoring cameras to prove that cats play a significant role in killing native birds, reptiles and even some vulnerable invertebrates.	Support is acknowledged. Rules are both there to allow for better data gathering to inform future RPMP reviews and operational delivery, and to also support existing community effort in managing feral cats. Sightings will be dealt with on a case by case basis, dependent on location and circumstance. Reporting of feral and stray cats by the public is encouraged. Reports will be recorded in an appropriate council database and the information considered when assessing the need for any management at the site(s).	
Jane Jay	19217	It's a great starting point to reduce stray and feral cats within the district and beyond.	Support is acknowledged.	
Kevin Bolitho	19220	I agree the stray and feral cats are a major issue for native species and control is imperative. This plan is a start but to me does not go far enough. I strongly urge a wider area be	Support is acknowledged. Agree with the sentiment of the submission but neither Council is currently resourced to consider	

		considered as high ecological value. It would be great to have some progress soon.	district wide rules due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale.	
John Longden	19222	I support all the specific proposals, but would strongly support making these rules applicable throughout the whole of the district, both rural and urban. There is ample research on the ability of feral and domestic cats to travel long distances in a short time; attempting to raise the level of control in a small area surrounded by a vast pool of unmanaged cats is no more than tokenism.	Support is acknowledged. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. Details around ‘stepped up’ trapping efforts and what that would look like have yet to be determined and would be set out in the RPMP annual operational plans for future years. Putting policies in place around feral and stray cat management (and expectations of occupiers) is the first key step in expanding into control work.	
Jeana	19226	It is inadequate. With all the research conducted showing the impact of feral cats the map of the area for targeting feral and stray cats needs to include the greater areas of Richmond and Nelson including the cities. For example, people have told me in the area above Jimmy Lee creek they have spotted feral cats. This is unacceptable and TDC/NCC needs to control those areas and reduce the cat populations. TDC/NCC have a responsibility to increase public awareness regarding the damage stray and feral can do as many in the general public are unaware of this. I would also like to know how the councils propose to manage feral cats. Finally, more needs to be done in terms of ensuring cats are desexed/microchipped. Who is monitoring this and the public need to know it is being monitored.	Submission acknowledged. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. NCC produces excellent educational information on caring well for companion cats and the damage that can be done with allowing them to roam. Refer to attached link: https://www.nelson.govt.nz/services/licensing-and-environmental-health/good-cat-ownership-guidelines/ Microchipping of companion cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand and both councils have proposals underway looking at introducing cat management bylaws, which also support the RPMP provisions.	
Sonja Kamphuis	19229	I support all measures to control/eliminate feral cat populations. The harm stray and feral cats do to our wildlife and pet cats is unacceptable. We should be microchipping pet cats and educating owners on keeping them contained.	Support is acknowledged. Decline relief sought. Microchipping of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand. Refer also to educational material provided:	

			https://www.nelson.govt.nz/services/licensing-and-environmental-health/good-cat-ownership-guidelines/	
Elizabeth Tennet	19238	I strongly support the eradication of feral and stray cats. Our native birds and ground creatures will not survive whilst feral and stray cats are left to roam and multiply in our region. Personally, I conduct my own eradication of feral and stray cats on our property and the increased number of native birds, particularly bellbirds, have noticeably increased in number. I would also support a stronger measure to control the movement of domestic cats as they are native killers as well.	Support is acknowledged and the efforts are admirable. The sentiment regarding the management of domestic cats is noted. Both councils have proposals underway looking at introducing cat management bylaws, which also support the RPMP provisions.	
Karl Arndt	19245	We should be getting rid of all feral and stray cats everywhere and anywhere they are found.	Support is acknowledged. Decline relief sought. While the sentiment is appreciated, this approach is well beyond the means of councils and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale.	
Trevor James	19263	It is a good first step, but I would like to see greater controls: Rule applying everywhere against releasing cats into the wild. Rule requiring microchipping, starting in the most sensitive areas	Support is acknowledged. Decline relief sought for region wide ban on releasing cats to the wild due to being well beyond the means of councils current resources to manage. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand. Both councils have proposals underway looking at introducing cat management bylaws, which also support the RPMP provisions.	
Ralph Loughrey	19272	These proposals do not go far enough. All cats in Nelson and Tasman should be microchipped and registered.	Decline relief sought. Microchipping of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand. Both councils have proposals underway looking at introducing cat management bylaws, which also support the RPMP provisions.	
Lucy Byrne	19278	I think all cats should be desexed and microchipped across New Zealand but this is a good start in the region. I live next to the Grampians in Bishopdale, Nelson and constantly see uncollared cats.	Support is acknowledged. Decline relief sought for region wide ban on releasing cats to the wild due to being well beyond the means of councils current resources to manage. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.	

			Both councils have proposals underway looking at introducing cat management bylaws, which also support the RPMP provisions.	
Joanna Santa Barbara	19281	I support TDC's suggested management plan for feral cats and encourage its extension into other areas.	Support is acknowledged.	
Ray Zinsli	19284	This is a good start but I would prefer to see even stronger measures eg banning of all cats (even pets) in the future. In the meantime, requiring of pet cats to be enclosed in 'catios' for those who insist on keeping them in the short term. I presume feral and stray cats can be shot and poisoned, rather than live capture. I fear the intention might be to live trap and check for chip before euthanasia, and that would be very time and money expensive cf shooting/poisoning. Nationwide we need anti-pet cat publicity so well done. I hope hedgehogs, rodents and mustelids will also be under upscaled controls.	Support is acknowledged. Banning of pets is not within the scope of either Council and would require much discussion at a national level. Responsible management of pet cats, and humane removal of feral/stray cats is what both councils advocate for. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.	
Roger Sanson	19287	As a domestic-cat owner I fully support implementation of the proposed controls. I'm of the view that unidentifiable cats captured within an urban area should be held for a brief period (say three day) and, if not claimed within that time, should be destroyed. Furthermore, that return to a claimant is strictly on condition of the animal being immediately neutered and micro-chipped. With respect to cats located in non-urban areas, non-chipped and presenting as feral, they should be immediately destroyed. I do not agree with neutering and returning to the wild.	Support is acknowledged.	
John Hillock	19290	I do believe that the plans do not go far enough. Even in Australia, several states restrict cat ownership to those who have cats that are microchipped, de-sexed and restricted to indoors. Cats roam and their natural instinct is to kill birds and such as skinks, etc.. It is illogical to have restrictions on cat control only within a tiny proportion of the district. Why not make the restrictions district-wide? Just this week, we have had a flyer in our mailbox regarding 'Biscuit', a cat that has been missing since Christmas, who 'usually goes away for a few weeks now and then'. Biscuit is not microchipped and does not wear a	Submission acknowledged. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. The management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.	

		collar. So, he is living off the land and that will not just be rabbits. My submission is that ALL cats in the area should be microchipped and de-sexed (unless the owner gains a breeder's licence-this licensing would need to be sorted) and indoors at least at night. Maximum ownership of two cats, unless a licensed breeder. Roaming cats to be confirmed as predators to be controlled/eliminated. This is not unreasonable or onerous, surely? Our native bird population would increase exponentially!		
Bruce Mutton	19333	I support the proposal.	Support is acknowledged.	
Dave and Kate Prebble	19418	Feral/stray cats are responsible for the killing of many birds, also lizards. We feel they should be eradicated from all sites mentioned in this proposal.	Support is acknowledged.	
Richard Furness	19449	<p>Feral and stray cats have a far greater impact on the environment than some of the pest plants mentioned. The suggested rule changes are a start but surely one should consider that feral cats and dumped companion cats travel very large distances in a day and thus some of the rules should be applied to the whole district not to just the defined areas. The rule I would make district wide in stage 1 would be " No person shall deliberately release into the wild (any place other than the persons garden) any companion or stray cat. Any person found to be doing this will be fined \$5000 for each cat".</p> <p>Why I say this is that just this week we have caught 4 young cats where somebody has dumped them in the countryside. Our present tally since the start of 2024 is 6 cats, one being properly feral. This has been a major issue over many years for the business I work with. These dumped cats would become feral in a very short space of time if they had not been caught and would be travelling all over Tasman. The Plan also gives no indication of the repercussions if someone is found to be releasing cats plus no indication of how we can report suspected persons of releasing the cats. Releasing cats in this way is cruel to the extreme. Now is the time to start taking some steps to overcome this cruelty to cats whilst protecting our wild animals and</p>	<p>Decline relief sought for region wide ban on releasing cats to the wild due to this being well beyond the means of councils current resources to manage.</p> <p>The Biosecurity Act does not have provisions for imposing instant fines through an RPMP (e.g. they remain an option currently only at the border for biosecurity infringements related to overseas travellers coming into NZ).</p> <p>The below rule may assist dealing with the issues raised (at key Nelson sites) but would involve catching perpetrators in the act of release, or via credible video footage, for example. There are penalties for disregard for RPMP rules.</p> <p><i>Specific pest agent cat rule for the Nelson City site-led programme</i></p> <p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any cat, including a companion or stray cat.</p>	

		remaining sensitive to cat lovers (I classify cat lovers as those people who will chip and pay a license fee to have a cat and will not subject a cat to cruelty by releasing it in the wild).		
Ian Bilbrough	19455	I think it is a good start, but in the long term landowners need more. Keep it simple. We have bylaws for dog control then they should also apply to all cats ... using existing legislation will save many \$. We have a neighbour who blatantly ignores our frustration. I am of the opinion that education is a waste of time !	Support is acknowledged. Dog bylaws are developed under the Dog Control Act, so cannot be used to manage cats under the same legislation. A separate Cat Management bylaw is the best place for this. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.	
Mike Orchard	19456	I believe that stray and feral cats along with unmanaged domestic cats are decimating bird, reptile and insect biodiversity. International studies support this view. It is time for domestic cats to be desexed and microchipped as a minimum to drive owner accountability and determine how far they range. Feral cats are a major problem that is exacerbated by interbreeding with domestic pet cats/abandoned pets/actively hunting pet cats. Current processes for euthanizing captured cats are an obstacle that would be solved by microchipping. Desexing all cats that are free to roam would limit population growth.	Support is acknowledged. A Cat Management bylaw, currently in process in TDC will address this submission point	
Lesley Johnstone	19458	Not sure why you limit the issue to the mentioned areas. Should these rules not apply all over the Nelson/Tasman district? The more 'spotty' the coverage is the more confusing to the public. A blanket rule for the whole area would be a lot less confusing and help prevent these unsupervised cats from moving from one territory to another.	Support is acknowledged. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. The management of pet cats is best done through a cat management bylaw.	
Michael Burton	19462	All cats not contained on their owners property are by definition, feral. The Brook Sanctuary halo has meant that birds I have never seen in my garden in Tahunanui are now being seen such as Kereru and Tui. I have worked hard planting natives on the Tahunanui hill side to attract these birds but sadly the birds attract lots of cats as well. I have seen my Neighbours "pet" cats with native birds in their mouths and my sensor lights are tripped several times a night by cats prowling through our place.	Submission point noted. Staff agree on the significant impact of cats on biodiversity and the need to manage this impact. However, a region-wide approach is well beyond the means of either council and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale	

		<p>There is no hope for our native fauna while cats are allowed to roam free, completely unfettered by any sort of regulation for their owners. I have been told that if I live trap them and take them to the SPCA they will simply return them to their owners. Trapping of rodents and mustelids, while admirable, is a waste of time while we give open license to domestic cats, feral or otherwise they are all natural born killers. Compulsory cat containment and the elimination of strays and ferals is the only solution to give our native birds and reptiles a chance.</p>		
Adam Lumsden	19466	<p>I believe there should be legally enforced de-sexing and microchipping of all companion cats. Cats should be required to be registered and have registration fees, the same as dogs. Cat ownership exclusion zones, or zones where properties must be 'cat proofed' to stop companion cats from leaving the property. These views have been concreted after working on a council led feral cat eradication program at two Nelson sites. One of them having over 20 cats caught within one month. Of the 20, three kittens and two young adults were taken in by the SPCA.</p>	Support is acknowledged. Companion cat management falls within the scope of a cat management bylaw.	
Elizabeth Bryant	19468	<p>Native birds are starting to spill out to Motueka from surrounding trapped areas - which is wonderful. However, "companion "cats are hunting them down. They also use the estuary track to access the seashore and can be seen returning home for breakfast. This killing of native birds is especially distressing when you have planted natives as we have been encouraged to do. Across the world cats are being enclosed. There are some amazing large enclosures available. Scientific Papers are available showing that cats do well in these cages. In Victoria you cannot legally let your cat trespass on other people's property. Surely, we do not want to become so far behind!</p> <p>I would like to ask that you make it mandatory to keep cats enclosed. Indeed, it would be good to at least start with owners when giving away kittens being responsible to give them only to people with such enclosures, cages, or electronic fencing, and</p>	Support is acknowledged. Companion cat management falls within the scope of a cat management bylaw.	

		also for it to be mandatory to keep you cat on your own property. No straying.		
Pamela Pope	19471	I agree that it is high time both councils took seriously, the problems being caused by feral, stray and companion cats at the top of the South Island, and the many areas under your watch. We are lucky enough to have Abel Tasman National Park and the Brook Waimarama sanctuary in our area, but if the councils don't come on board and make a better effort regarding cats, all the huge effort by volunteers and paid workers and millions of dollars could be wasted. Feral and stray cats (five impacts noted). It is high time there was formal control - micro chipped and spayed, to reduce unwanted kittens that get dumped or left to roam. We have got to do far better than this it should be illegal to catch, spay and release also, which is happening in some areas.	Support is acknowledged. District wide Companion cat management falls within the scope of a cat management bylaw.	
Neil Whittaker	19479	I support managing cats, we can have domestic cats and birds BUT only if we eradicate feral/stray cats and desex, microchip and put bells on domestic cats. We are losing our birdlife. Our native forests are deafening silent	Support is acknowledged. District wide Companion cat management falls within the scope of a cat management bylaw.	
Joan Corry	19482	Feral cats can kill birds and insects so we think it is a good idea to get rid of them if you can from high biodiversity areas.	The support is appreciated. Stepped up education around responsible companion cat management will also be required.	
Jane Stevens	19486	I strongly agree with all the proposals for managing feral and stray cats, and would like to see even tighter controls on the management of companion cats, particularly in National Parks. I think that companion cats should be totally excluded from National Parks due to their habit of roaming over a wide area. Microchipping and desexing does not prevent a cat from predated wildlife. A domestic cat can live for 10-12 years, which can result in the destruction of 100s, if not 1000s of dead birds, reptiles and insects over one cat's lifetime. Living in a National Park should be viewed as a privilege which comes with responsibilities to the wildlife that the park was set	Support is acknowledged.	

		up to protect. I hope both TDC and NCC will encourage central government to issue national guidelines for cat management rather than it being left to local authorities to deal with it in an ad hoc way.		
Sue Lindsay	19506	I think feral cats need to be actively eliminated in all areas, not just those mentioned in the plan. Not only are they a terrible predator on our native birds and invertebrates, but they also carry and transmit toxoplasmosis, which is increasingly causing major stock losses for local farmers.	While the sentiment is appreciated, this approach is well beyond the means of councils and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale.	
Shaun Akinson	19604	Good stuff, however compelling people to report sightings is probably unenforceable and likely to upset the locals. A strong emphasis on education and visits by council staff, eg holiday periods (perhaps by the Harbour Master for ATNP,) would be more productive.	Submission point noted and rule provision edited to clarify that reporting is for data gathering and allowing for better understanding of the issue to inform future reviews.	
Graham Wright	19666	I support the proposed rules.	The support is appreciated.	
John Hutton	19703	<p>It seems to me that the proposed 'new' restrictions/limitations are too limited. Having lived on West Bank Road for more than a decade and seeing all the feral cats there, as well as now living at Mahana Ridge, where feral cats and, indeed, uncontrolled domestic cats are causing predation on a range of species, I believe there should be more limits on the 'free ranging' of cats.</p> <p>I would hope that in time more people would contact council and express their concerns, as I suppose that would be necessary before future planning takes into account the damage done by feral and free-ranging domestic cats to our local wildlife. There seems to be no responsibility taken by many domestic cat owners who let their cats out at night to freely roam the environment, hunting and killing whatever they choose to kill that night. Surely, some kind of public education campaign would help educate these cat owners on the dangers they pose.</p>	While the sentiment is appreciated, this approach is well beyond the means of councils and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale.	

		Anyway, for now, i just wanted to let you know that I think the 'new' limitations are far too limited and narrow in their application and I hope for a wider control response in the future.	
Forest and Bird Golden Bay branch	19722	<p><i>(summary of submission below)</i></p> <p>FERAL CATS: Feral cats are a serious predator of ground nesting birds. In Nikki McArthur’s report “A Review of Management Issues and Options for Coastal Birds in the Tasman District” commissioned by Tasman District Council he states “feral cats are ubiquitous in coastal habitats in the Tasman District. This being the case, we consider it highly likely that ground nesting coastal birds in the Tasman District will be experiencing high feral cat depredation rates to those observed in similar habitats elsewhere in the country.</p> <p>We are asking for feral cats to be included in the Plan in Golden Bay with the following rules:</p> <ol style="list-style-type: none"> 1. Feral cats can be kill trapped at the seven shorebird sites in Golden Bay – Taupata, Pakawau, Collingwood, the Parawhakaoho, Onahau and Rototai/Motupipi. 2. Night shooting to be allowed on only four sites – Taupata, the Parawhakaoho, the Onahau Sandspit and Rototai/Motupipi on the Rototai Sandspit, the Rototai Shellbank and on the accreted land between the Motupipi Estuary and Pohara Beach. These sites are all well away from any residential properties. 3. Residents to be notified seven days prior to undertaking either kill trapping or night shooting. Dates advertised in the Public Notices section of the Golden Bay Weekly, on the Golden Bay Community Noticeboard Facebook page and through leaflet drops to residents requesting people keep their cats indoors between sunset and sunrise. 	Submission point noted. The inclusion of new sites is outside of the scope of this partial review. Any consideration of a new site would be in response to an existing programme of work and would need to have initial consultation with affected landowners before being included. However, the request for a further site led programme is noted for future review.

The Ornithological Society of New Zealand – Tasman-Nelson region	19748	<p>We note that: ‘Both Councils wish to step up feral and stray cat management at sites with important biodiversity values and further promote responsible companion cat ownership overall’. The Draft Plan states: ‘Feral and stray cats also carry parasites and toxoplasmosis, which causes abortions in sheep and illness in humans’. We would draw attention to the fact that toxoplasmosis can also affect native avifauna, including kererū (<i>Hemiphaga novaseelandiae</i>), kākā (<i>Nestor meridionalis</i>) and kiwi species (<i>Apteryx spp.</i>)</p> <p>As such, disease risks from feral and stray cats should be considered together with predation impacts on native avifauna. The proposed expansion of site-led programmes to include both feral and stray cats in Tasman and Nelson should not only reduce predation pressure on avifauna, but also potentially limit the occurrence of <i>Toxoplasma gondii</i> in the environment.</p>	<p>Accept submission. Rule proposal _ description and adverse effects has been edited to incorporate biodiversity impacts of toxoplasmosis, as per below.</p> <p><i>‘Feral and stray cats also carry parasites and toxoplasmosis, which can cause abortions in sheep, illness in humans and may adversely affect native birds in the region’.</i></p>	
Matt	19725	Strongly support this option, and any proposed cat management bylaw options.	The support is acknowledged.	
Will Parkyn	19735	Doesn’t go far enough and should include the whole region. Let’s look for a plan to eradicate all predators from the district.	While the sentiment is appreciated, this approach is well beyond the means of councils and occupiers, due to the costs involved and the difficulty in controlling feral/stray cats at a landscape scale. Protecting specific sites from predation by introduced mammals is a more realistic approach for both councils.	
Sky Davies - Tasman Environmental Trust	19747	TET supports measures to limit the presence of cats in important wildlife areas. I would also like to add the Farmers for Whio areas in the Motueka Catchment to this plan. This includes subcatchments that border Kahurangi National park including Baton, Pearse, Graham, and Pokororo rivers. There is extensive trapping of stoats and ferrets in these areas to create safe habitat for whio. I am aware of some stray cat colonies and would like these to be controlled and for the number of companion cats to also be limited.	Submission point noted. The inclusion of new sites is outside of the scope of this partial review. Any consideration of a new site would be in response to an existing programme of work and would need to have initial consultation with affected landowners before being included. However, the request for a further site led programme is noted for future review.	

Allen Berthelsen	19825	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>	<p>The support is acknowledged. However, the management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.</p>	
Cam Carter	19824	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>	<p>The support is acknowledged. However, the management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p>	
Anna Berthelsen	19823	<p>I am also fully supportive of the inclusion of feral and stray cat management given the terrible toll cats have on our native wildlife.</p> <p>Personally I would also like more regulation around domestic cats as well e.g., micro chipping, de-sexing, cat curfews at night. This is due to the impacts that domestic cats have on native wildlife but also their human health impacts e.g., toxoplasmosis.</p>	<p>The support is acknowledged. However, the management of pet cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p>	
Robert	19821	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. - I am not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc. it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to</p>	<p>The support is acknowledged. The purpose of the reporting rule is to assist TDC and NCC to identify the location of feral cats and gather data to inform future reviews. Disagree that reporting cats could lead to competitive release of other predatory mammals as they are being controlled at the same places the same time.</p>	

		<p>perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>		
Robert	19809	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. - I am not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc. it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>		
Chris Ecroyd	19785	<p>The proposal does not go far enough. It is annoying to have a garden with native skinks and birds present and to observe the</p>	<p>While the sentiment is appreciated, a whole of region approach is well beyond the means of both councils and occupiers, due to the</p>	

		predation by cats from the neighbouring properties. Cats should not be allowed to freely roam the area.	costs involved and the difficulty in controlling feral/stray cats at a landscape scale. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.	
Fiona Ede	19771	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	The support is appreciated	
Roger Frost	19764	Support (and would like to see extended to anywhere within 100m of DOC estate or any Conservation zoned land). In relation to St Arnaud the rule: "No person shall deliberately release into the wild (e.g. Nelson Lakes National Park and environs) any companion cat from or living within the mapped area." seems possibly a little unclear. As I read it it seems to imply that it is not an offence to release a companion cat into the wild if it is from or living OUTSIDE the mapped area. Is this intended?	Submission point on clarifying St Arnaud rule is noted. Rule has been edited to remove 'companion' to clarify that it applies to all cats. Staff agree that extension of the rule would be beneficial, however it would be difficult to manage and enforce and is outside of the scope of either Council to implement.	
Richard Mangin	19789	As a rural resident we have noticed feral and stray cats becoming more prevalent and having a severe effect on our bird and skink populations. We feel that the council's control program should have a much broader focus, in identifying and controlling population hotspots and introducing mandatory micro-chipping and desexing of companion cats.	Management of pet cats across the district will fall under a Cat Management bylaw. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.	
John Reeves	19755	Myself and Jane Reeves strongly support the efforts to contain the impact of feral and stray cats. The carnage to native species is well documented and therefore the councils should be congratulated for taking the lead on this matter. The reason I support control at all the above sites is due obviously to their sensitive biodiversity, but also because I visit those places regularly.	The support is appreciated	

		I spent a significant portion of my spare time on community pest control activities; possums, stoats, rats and mice. I note that cats are particularly hard to catch so good luck.		
SPCA National Support Office	n/a	<p>(Submission summary)</p> <p>SPCA acknowledges there are times when controlling the populations of non-native wild animals is necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of the targeted species.</p> <p>SPCA commends the inclusion of cat categories distinguishing between companion, stray, and feral cats in the partial review of the Tasman-Nelson Regional Pest Management Plan.</p> <p>SPCA urges both councils to promote and support the microchipping and registering of microchips on the Companion Animal Register of all companion cats in Nelson and Tasman.</p> <p>SPCA acknowledges the efforts of many people who support the lives of individual stray cats and those living in colonies.</p> <p>SPCA acknowledges that managed, targeted Trap-Neuter-Return (mtTNR) can be an important longer-term management tool for stray cats. SPCA does not support trap-neuter-return programmes in areas where cats pose a significant risk to native wildlife.</p> <p>Animal control should be conducted as part of an integrated pest management programme that includes human behaviour change, assessment of harms to animals intentionally and unintentionally targeted, and monitoring of efforts. Lethal management methods should only be used when there is no effective non-lethal, humane alternative.</p> <p>SPCA advocates that the Tasman-Nelson Regional Pest Management Plan include education and training for humanely reducing and eradicating targeted species.</p> <p>SPCA opposes the use of poisons, leghold traps, and snares to kill or capture animals due to the severe welfare harms animals experience from the use of these methods of management.</p>	<p>The concerns for animal welfare are acknowledged. Staff always advise humane treatment and provide only live capture traps for the purpose of catching feral or stray cats.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions. SPCA is involved in discussions over both councils proposals.</p>	

		<p>SPCA is concerned about traps that rely on a noose-like mechanism to kill an animal that poses a strangulation hazard to the trapped animal. SPCA advocates for more research on this topic to determine if the mechanism of death is acceptable based on welfare harms.</p>		
<p>Forest and Bird - National Office</p>	n/a	<p>Forest & Bird welcomes the increase of sites for management of feral and stray cats. Forest & Bird understands that TDC and NCC will be consulting on a cat bylaw and we also welcome this and see it as an important first step toward more responsible cat ownership and toward fulfilling objectives in the regional biodiversity strategies (Nelson Biodiversity Strategy, Tasman BioStrategy, Kotahitanga Mō Te Taiao Strategy).</p> <p>Forest & Bird would like to see the following feral and stray cat rules apply across the whole region, rather than just at named sites.</p> <ol style="list-style-type: none"> 1. No person shall feed or shelter any feral or stray cat. 2. No person shall deliberately release into the wild any companion or stray cat. <p>Alternatively, these provisions should be included in a cat bylaw along with compulsory registration, desexing and microchipping.</p>	<p>Submission point acknowledged and will be considered for future review.</p> <p>Rules around feeding feral or stray cats first requires companion cats to be identifiable. The proposed cat management bylaw, to make microchipping compulsory, would help in this instance. Neither Council currently has the resources to manage a district-wide rule on deliberately releasing cats.</p>	
<p>Brook Waimārama Sanctuary</p>	n/a	<p>No person shall deliberately release into the wild (i.e., in any named high value site in Nelson as shown on Map 3.1 in this Proposal) any companion or stray cat. - Fully agree</p> <p>a) Any person who suspects the presence of any feral or stray cat in any named high value site must report its presence and location to Nelson City Council within 48 hours of their sighting. – We are not clear on the objective of this point. Feral cats are one part of a whole suit of small mammal pests in many if not all of the named high value forested sites. Just like rats, stoats etc.</p>	<p>The support is acknowledged. The purpose of the reporting rule is to assist TDC and NCC to identify the location of feral cats. Disagree that reporting cats could lead to competitive release of other predatory mammals as they are being controlled at the same places the same time.</p>	

		<p>it is known that they are present. Why reporting feral cats? If the intention is to specifically control only feral cats this will lead to perverse outcomes due to competitive release of stoats and weasels. This would be a significant risk for the the biosecurity for the Brook Waimārama Sanctuary for example. I fully agree for the need of small mammal control in any of the named high value sites including feral cats. But it is absolutely essential that the whole suit of small mammals (namely rats, mustelids, possums and feral cats) are target concurrently!</p> <p>b) No person shall feed or shelter any feral or stray cat in any named high value site. - Agree</p>		
4.4.1 Feral and stray cats – Nelson City sites				
Alistair Kwan	17984	<p>"It seems merely symbolic to make rules about cats in high-value sites (note the necessity of a hyphen in ""high-value"") without making supporting rules for adjacent neighbourhoods. Consider the residential area of the Brook Valley, for example, between two high-value sites. It takes mere seconds for a cat to enter the Grampians reserve from a property backing onto the Grampians reserve. Even a human can do it. The proposal mentions difficulties in keeping cats at home but these appear to be merely received opinion, irrelevant to the need to do so. Many cats are kept at home, and many are kept indoors-only or with semi-outdoors runs (e.g. ""cacios""); there is nothing impossible about it. Perhaps a buffer zone needs to be defined - based on research-established cat roaming ranges - in which cats must be more strictly contained, and must be neutered.</p>	<p>Decline relief sought. The management of companion cats is best done through a bylaw approach (or via national legislation) rather than through pest legislation. The two issues do go hand in hand. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p>	
Alison Couldrey	18520	<p>Nelson city/reserves - allow trapping of cats by volunteer pest control groups. I'd be happy to see kill traps for them, because live trapping would be problematic getting the caught animal to SPCA/vet for microchip ID. Country wide, cats should be microchipped and be required to be kept on owners property at all times.</p>	<p>27/03/24 NCC's current approach does not permit any cat trapping by volunteer groups. Cats are managed by experienced contractors with support of the SPCA at two sites: Wakapuaka sandflats and the York Valley Landfill.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p>	

Elise Doyer	19047	These rules need to be much wider and include the whole Nelson City area with responsibility placed on cat owners to microchip and desex their cats as well as keep them on their own properties at least for the hours from dusk to dawn.	<p>Agree with the sentiment, however city-wide rules and programme would be beyond the resources of NCC, hence the focus on 30+ key biodiversity sites within the city.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p>	
Bryce Buckland	19086	<p>The proposal to control and manage stray and feral cats is well due and most people, including cat owners, recognise the ecological damage they do but most will deny that action to reduce these animals should be taken. There is no shortage of Cats and responsibility for their m must be taken. I would like to see the area for control of all Cats extended outside the maps as shown as Cats know no boundaries. I would also like to see that new subdivisions like the proposed one for Maitai Valley should be declared a 'no cat area'. For the last 15 years I have been involved with the Conservation project on Grampians Reserve and have trapped over 1,100 Possums. Most of these are eaten out by Cats. We do no Cat control now but are aware it needs to be undertaken as it's common to see newly dumped Cats on Grampians. These pests have a serious effect on the Native Birdlife (EG: Fantails) we are trying to save. Because of the toxic, extreme and uncompromising nature of many Cat lovers we would like the legal right to take action on these animals. At St Arnaud many Cats get dumped or are bred to be Feral and for several years a local was collecting Cats from SPCA and releasing them at St Arnaud. Now locals trap hundreds of Cats and up until recently it was common to shoot around 120 Cats each year Locals now have a "Cat year". The map should also include Valleys such as Rainbow Valley and around both Lakes and also North of Nelson to the Wangamoas and South passed Wakefield, to Upper Moutere Village. The proposal must be given all the possible powers to succeed otherwise it will fail, Cat owners will persuade authorities to go soft and Cat status will be left to pest controllers who may act outside the legislation.</p>	<p>Agree with the sentiment, however city-wide rules and programme would be beyond the resources of NCC, hence the focus on 30+ key biodiversity sites within the city.</p> <p>Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions.</p> <p>Cat free subdivision requests are not a good fit for inclusion under Biosecurity Act legislation (which deal with pests only) and are more better directed to be considered through RMA provisions.</p>	

Steven Gray	19131	I think the high-value sites should include all reserves in Nelson City. When we have deployed trail cameras within the Centre of New Zealand Botanical Hill Reserve, we always detect cats during those monitoring exercises. Whether or not they have domestic ties, they are either feral or strays. We should be able to trap them like rats, possums, stoats, and hedgehogs. They are doing more damage to birdlife than all other pests combined.	Decline killing of cats on Botanical Hill. Rules to permit cat control are not included in this review. The provisions include only reporting of cats and no dumping of cats in identified areas. If high proportions of companion cats are microchipped, then live trapping by experienced persons could be carried out on Botanical Hill, coupled with targeted education.	
Lesley Kuykendall	19279	The Nelson City sites need to require desexing and microchipping of cats as in the St Arnaud proposal. I agree that feral cats need to be controlled in all of the sites. How effective will the reporting requirement be? Once a cat is reported, what will the follow-up be? Are certain staff going to be given this job as a priority? Is there a place for trapping feral cats in some areas like Abel Tasman National Park?	Decline relief sought. Both councils have proposals underway looking at introducing cat management bylaws (e.g. for microchipping and desexing), which also support the RPMP provisions. The St Arnaud is a specific pest agent cat rule designed for one place, whereas the city situation is quite different with 30+ sites involved. Regarding reporting of cats in the sites, rules are there to allow for better data gathering to inform future RPMP reviews and operational delivery, and to also support existing community effort in managing feral cats. Sightings will be dealt with on a case by case basis, dependent on location and circumstance. Reporting of feral and stray cats by the public is encouraged. Reports will be recorded in an appropriate council database and the information considered when assessing the need for any management at the site(s).	
Steven Gray	19673	1. Birdlife Centre of NZ is a community trapping group formed in 2011 to increase wildlife, especially birds, in the Botanical Hill Reserve, a “high ecological value site”. More than 25 volunteers are responsible for servicing almost 300 traps, targeting possums, rats, mustelids, mice and hedgehogs, as part of NCC’s Halo Project. Since April 2019, we have trapped over 100 possums, 1400 rats, 16 mustelids, 2250 mice and 50 hedgehogs. In addition, we have more than 25 ‘backyard’ trappers, in the vicinity of the Reserve, who have caught more than 400 pests (mostly rats), over the last three years. 2. We have trail camera footage (day and night) and anecdotal evidence (eg, observations by Kūmānu employees and members	Accept in part. Following education, cat management could focus on reserves like Botanical Hill. Killing of cats on Botanical Hill is not supported. Rules to permit cat trapping are not included in this review. The provisions include only reporting of cats and no dumping of cats in identified areas. If high numbers of companion cats are microchipped, then live trapping by experienced persons could be carried out on Botanical Hill, coupled with targeted education.	

		<p>of the public) showing the presence of feral, stray and domestic cats in various parts of the Reserve. Cats, including domestic cats, have a justified reputation as predators of birds, insects and reptiles.</p> <p>3. We believe there should be controls on all cats to protect wildlife (especially indigenous species) and prevent the spread of disease. Accordingly, we support moves to require cats to be microchipped and registered; the mandatory de-sexing of cats (except for registered breeders); and a limit to the number of cats per household.</p> <p>4. As part of the RPMP we propose NCC begin a trapping campaign targeting feral and stray cats in “high ecological value sites”, including the Botanical Hill Reserve, following a public education programme.</p>		
DOC	n/a	<p>(Abridged). Support in principle with amendments:</p> <p>Amend pest agent cat rule (b) for the St Arnaud environs site-led programme as follows: <i>No person shall deliberately release into the wild (e.g. i.e. Nelson Lakes National Park and environs) any companion or stray cat from or living within the mapped area.</i></p> <p>Consider making the pest agent rule as modified above a region-wide rule.</p> <p>Amend the rule for Abel Tasman National Park private enclaves to include the following pest agent rules:</p> <p>a. No person shall keep, hold or harbour any</p>	<p>Support is acknowledged</p> <p>Accept the suggested amendment pest agent cat rule (b).</p> <p>Decline relief sought regarding regional pest agent rule: This partial review process focuses on the management of feral and stray cats in specific sites (site-led). A regional ban on release to the wild would be a pest-led strategy and thus is out of scope. Neither Council currently has the resources to manage a district-wide rule on deliberately releasing cats.</p> <p>When considering the relief sought regarding Abel Tasman national Park pest agent rule, the council must consider whether the affected occupiers have been sufficiently consulted. The proposed cat management bylaw will address suggested rule a. Staff recommend declining the inclusion of the suggested B as this would require further consultation with affected landowners.</p>	

		<p>companion cat within the mapped area unless it is desexed and its identity is microchipped and the chip is registered on the New Zealand Companion Animal Register.</p> <p>b. No person shall deliberately release into the wild (i.e. Abel Tasman National Park and environs) any companion or stray cat.</p> <p>Clarify the criteria used for identifying 'high value sites' in Nelson City and re-assess how these have been applied to ensure that sites included within the programme are justified and satisfy cost-benefit requirements.</p> <p>Clarify whether other areas have been assessed against the criteria for 'high value sites'.</p> <p>Clarify the process for adding additional areas to the RPMP if/when they are assessed to be 'high value sites'.</p>	<p>Accept relief sought with respect to clarification of the criteria for and selection of 'high value sites'</p> <p>Criteria used to identify sites high value sites in Nelson were: NCC Public Reserve Land where community or Council habitat protection work was focussed and/or that the area benefited ecological connectivity. Distance from Brook Waimārama Sanctuary was also used to compare sites. Note that Boulder Bank was included in consultation with DOC and Port Nelson Ltd.</p> <p>Full review planned for 2029 could capture new sites. Note that reserves were excluded if isolated, small or surrounded by high density urban areas (e.g., Pipers Reserve).</p> <p>In order to include additional sites into the RPMP, Council would need to be sure that the rule is fully funded. This would require either an increase in Council funding, or the support of an existing community or agency driven programme for which the rule is a supportive backstop rather than a start of a new programme for Council staff.</p>	
Forest and Bird - National Office	n/a	Forest & Bird support the inclusion of all the named sites in the consultation.	The support is appreciated	
4.4.1 Feral and stray cats – Tasman District sites				
Alison Couldrey	18520	Sites on margin of Abel Tasman NP should ban cats and instigate kill trapping regime. St Arnaud - try and ban new 'companion' cats. Require all such cats to be retained on property. Use kill traps for stray/feral cats.	Submission acknowledged. Banning of pet cats is outside of the scope of this review and would require extensive consultation with St Arnaud residents.	
Cynthia McConville	19680	I am writing in support of the Forest and Bird submission on the TNRPMP. Specifically the inclusion of [edits made] feral cats in Golden Bay in the revised plan. I have seen the impact these animals have on our coastal shorebirds and seabirds at sites where they roost and nest along our coastline.	Submission acknowledged	

Patrick Steer	19742	I strongly support the control of feral and stray cats. I would like to see council take more action to support our coastal bird population through greater pest control. Specifically include the coastal area between Motupipi, Takaka and Onahau Rivers in Golden Bay - this is an internationally important area for coastal birds that has no protection from multiple plant and animal pests.	Submission acknowledged. Request for new sites has been noted for future review.	
Robert Kennedy	19700	I think that the sites in Golden Bay, as detailed in the submission by the Golden Bay branch of the Forest & Bird Society, should be included as places where cats should be eliminated by kill-trapping or shooting. I do not see any point in micro-chipping cats so that they can be returned to owners, and allowed to return to predated birds.	Submission point acknowledged.	
Waimea Inlet Forum working group	19803	<p>The Waimea Inlet Forum supports the proposed partial review of the Regional Pest Management Plan. Our comments are about the proposed changes relating to feral cats.</p> <p>We note that the Battle for the Banded Rail programme run through the Tasman Environmental Trust currently has 1,153 traps for ferrets, stoats, weasels and rats (ship and Norway) set along 58km of traplines around the Inlet, including in the areas covered by the Regional Pest Management Plan’s site-led programme for Waimea Estuary.</p> <p>Since 2016 The Tasman Environmental Trust has also run a Live and Let Live feral cat control programme around key habitat areas on the Inlet.</p> <p>(Figure 1: Network of traps from Mapua to the Honest Lawyer)</p> <p>We would like to see the area covered by the Plan’s existing site-led programme for Feral cats, Brushtail possums, Ferrets, Stoats, Weasels and Rats (ship and Norway) at Waimea Estuary (Pearl Creek and Dominion Stream areas) increased, by extending two of the existing mapped areas and adding a sixth area.</p> <ul style="list-style-type: none"> • We ask that you extend the Matahura area to also include a) Dominion Flats on both sides of SH60 Te Mamaku Drive and b) Higgs Reserve. 	<p>Support acknowledged.</p> <p>If we are to extend the site-led programme we need to ensure affected landowners are appropriately consulted. As this extension was not included in the original proposal, staff recommend declining the extension where it either covers or neighbours private landowners. However, Bell Island is Council owned and has no direct neighbours, and therefore the impact on community would be insignificant. Staff recommend including Bell Island into the Waimea Inlet site led programme for feral cats.</p>	

		<ul style="list-style-type: none"> • We ask that you extend the Research Orchard Road area further to the west. • We ask that you add a new area, covering all of Bell Island and extending further east of it to include all of the Bell Island shellbank. <p>(Figure 2: Requested increase in area for Waimea Estuary site-led programme)</p> <p>The purpose of this increase is to support the habitat restoration work that has been undertaken at Dominion Flats and Higgs Reserve and at Research Orchard Road, and to provide a better level of protection for the significant native habitat that is the Bell Island shellbank.</p> <p>We trust that you will give consideration to making this amendment.</p> <p>For the Waimea Inlet Forum working group.</p> <p>P.S. We are also e-mailing this feedback, including the two Figures, to biosecurity@tasman.govt.nz</p>		
Forest and Bird - National Office	n/a	<p>Additional sites: Forest & Bird would like to see the following Golden Bay sites included as named sites:</p> <p>Forest & Bird Golden Bay’s E Toru Ngā Awa: Ko Takaka, Ko Motupipi, Ko Onahau the Three Rivers Project as an identified site within the RPMP. This area is home to internationally significant populations of breeding shorebirds¹ and is under active management, led by Forest & Bird’s Golden Bay branch, with support from the local community, Manawhenua Ki Mohua, and the Department of Conservation Takaka District Office.</p> <p>Puponga and environs, to support conservation efforts at Puponga Farm Park and Onetahua (Farewell Spit).</p> <p>Port Tarakohe and environs to support penguin conservation</p>	<p>Decline relief requested. As this is a limited review process, extending the size of Site-led Programmes is not in scope.</p> <p>Including these proposed new locations would require landowner consultation as they would be directly impacted .</p> <p>The proper time to consider extending sites is during the full review phase.</p>	
Project De-Vine	Late	Support the change. We appreciate the support towards our feral cat programme in our East Mohua Trapping Collective in	Support is acknowledged.	

Environmental Trust		Golden Bay and hope the RPMP will spur other landowners onto wanting to control the feral cats visiting their properties.		
Sabella				
Henry	19202	Strongly support	Support is acknowledged.	
Bruce Lines	19285	<p>While I understand the rational. My Experience suggests that owners if burdened with added costs to meet the LoF restrictions will attempt to comply at minimum cost. As such what can happen is vessel owners may take their vessel somewhere discrete and clean it themselves in an uncontrolled manner.</p> <p>Perhaps extending the time to 2,3,4? days' time frame in -Rule a. ' is also not intended to apply to those craft that are usually moored in the Tasman-Nelson region and leave the region for no more than 24 hours before returning.? may help reduce risk without being too hard on vessel owners.</p> <p>Allowing owners to dispose of the Sabella is very risky, and ease/access to information' (such as how to) needs to be considered.</p> <p>It may also be useful to allow a professional and experienced marine biosecurity diver to make inspections as an option. Simply because the travel lift can at times not be available.</p>	Support is acknowledged. Accept relief sought and recommend that the explanation of the proposed rule for Sabella be extended from 24 hours to 3 days in response to this submission point.	
Bruce Mutton	19340	I support the proposal.	Support is acknowledged.	
Matt	19732	Good approach. Important to have consistency across TOTS when it comes to pests.	Support is acknowledged.	
Dave Taylor	19752	Aquaculture New Zealand supports the continuation of the 'Eradication' status for Sabella (<i>Sabella spallanzanii</i>) under the proposed Tasman-Nelson RPMP. Sabella has potential to cause significant operational impacts to aquaculture in the Top of the South if it were to establish. The aquaculture industry is working closely with councils under the Top of the South Marine Biosecurity Partnership to ensure establishment does not occur, and we appreciate the need for a coordinated approach to	Support is acknowledged.	

		control measures. We, therefore, also support the proposed amendments to the RPMP to align them with those of Marlborough and enable consistency and powers in response to non-compliance.		
Fiona Ede	19772	I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum. The group endorses the proposed RPMP rules as they are written.	Support is acknowledged.	
Forest and Bird - National Office	n/a	Forest & Bird supports eradication over the whole region and the rules proposed in the consultation document to prevent Sabella becoming established in the region.	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change.	Support is acknowledged.	
5. Pest conifers and wilding conifers				
Pest wilding conifers - general comments				
Manu Danner	19099	Let's get onto it!	Support is acknowledged.	
Henry	19198	I am strongly for wilding conifer control. The macrocarpa is an additional conifer that has the potential for becoming invasive.	Support is acknowledged. Macrocarpa is not generally known to be very invasive through self-seeded spread but could be considered a pest agent conifer in some circumstances, under these RPMP proposed rules.	
Nick	19206	Great rule change - I'm hoping it includes Te Mamaku Drive [Ruby Bay] too - the forestry owner needs to keep on top of spreading wilding pines	Support is acknowledged.	
Chip Felton	19218	I'm very much in favour of the proposed changes as we need to do much more to combat the negative effects of introduced plant species, including of course introduced conifers. I personally would favour complete cessation of any new introduced conifer plantings anywhere in NZ.	Support is acknowledged.	

Neroli Amyes	19219	A very difficult problem to solve; needs much community cooperation to get onto any spread early when wilding seedlings are still small enough to deal with.	Agree	
John Longden	19223	I fully support the proposal in its entirety. I have seen and worked in wilding infestations in both Islands, and from sea level to above the bushline. Wildings threaten huge areas of the country . The threat from fire danger is of concern. but the greatest threat is the conversion of scrubland to sterile pine forest, and the invasion and effective destruction of tussocklands and alpine meadows by the hardier conifers such as lodgepole.	Support is acknowledged.	
Elizabeth Tennet	19239	I support the control of pest and wilding pines. They pose a fire risk and are a blot on the environmental landscape.	Support is acknowledged.	
Ralph Loughrey	19274	I agree with the proposal but it should cover the whole of the Nelson and Tasman districts.	Support is acknowledged. However it is still early days in the control programme and the inclusion of wilding and pest conifers in the RPMP. Necessarily, some of the rules can only apply to current operational areas managed through the MPI-led national programme. Two new rules are proposed which in effect apply to the whole region. Refer to the rewritten pest conifer policy.	
Lesley Kuykendall	19280	The proposals look comprehensive. It will depend on staff being available to followup on complaints and the cooperation of participants to achieve a good outcome. If someone refuses to comply with required action, how effective will the enforcement be? It is not helpful to have litigation go to the courts.	Support is acknowledged.	
Joanna Santa Barbara	19282	I support TDC's management plan.	Support is acknowledged.	
Roger Sanson	19288	One has only to drive through areas such as Central Otago to see the massive problem arising through years of failure to control the spread of wilding pines. I find it deeply disturbing to note the reduction in funding to those govt departments and other organisations charged with eradication and control of spread to new areas when funding regimes to date have proven inadequate to get on top of the challenge. I support all	Support is acknowledged.	

		regulations, enforcements, and other measures aimed at gaining control of this invasive problem.		
Bruce Mutton	19334	I support the proposal. I suggest extending the affected areas significantly.	Agree in part. Support is acknowledged. However it is still early days in the control programme and the inclusion of wilding and pest conifers in the RPMP. Necessarily, some of the rules can only apply to current operational areas managed through the MPI-led national programme. Two new rules are proposed which in effect apply to the whole region.	
Jane Stevens	19391	I agree with all effective measures that can be put in place to control the spread of wilding conifers. I include the word 'effective' as these plants spread into inaccessible areas, so a management plan needs to describe how inspections will be made and how to ensure any required action is taken.	Support is acknowledged.	
Richard Furness	19450	I would support the changes, even though it has been established that wilding pines can occur from trees kilometres away.	Support is acknowledged.	
Mike Orchard	19457	It's great that radiata and Douglas fir will be listed wilding conifers. This is a significant improvement and must be defended from compromise. Pinus radiata and Douglas Fir are aggressive colonisers along with the known pest conifers listed. Biodiversity is at risk - particularly in the ultramafic and alpine areas of Richmond FP but also privately owned adjacent land areas, and any disturbed land. It is great to see plantation/land owners needing to maintain buffers but wind carried seed spread from Douglas fir and other wilding pines is quite long distance. The buffer of 200m is pretty limited but understandable given current lack of any controls. The land "deemed valuable" seems too loose without criteria. In the future I suggest eDNA could be used to prove spread from a particular site or plantation. Cleared area rule very clear - strongly supported.	Support is acknowledged.	
Elizabeth Bryant	19467	I am impressed with this plan and thoroughly endorse it. However, I would like to put forward a suggestion for you to consider. Pine slash is causing pain and economic hardship to	Support is acknowledged. This submission is beyond the mandate of the RPMP process to address. RPMPs are created under the Biosecurity Act 1993 which specifically concern pests and pest	

		both councils and individuals. With the recent court case against pollution up north - using an old English law - it may be that pine slash polluting the rivers may be prosecutable. In any case it is past time that forest harvesters are made responsible for this pollution. I am asking that they are made responsible for this polluting slash.	pathway management. The issue of forestry slash as a polluter is an RMA 1991 matter and this point raised has been referred to elsewhere in Council to address.	
Bruce Struthers	19478	<p>My comments are on the summary on this web page. I hope the full proposal adequately addresses these issues:</p> <ol style="list-style-type: none"> 1. You have not clearly defined "adverse impacts on regional values". What are those regional values? What are the adverse impacts? Why were these species selected? 2. Your diagrams refer to "high value sites" but do not indicate what values are used for measurement, and what thresholds determine "high value". 3. You have not justified the selection of the proposed controlled areas. If a plant is a pest anywhere, it is likely to be a pest everywhere it is not controlled. 4. You have not advised or required actions to be taken to remove debris and slash from the cleared area. Unmanaged slash has already caused significant impact to District coastlines after rain events. 5. You have not advised or required a desirable course of action to restore a site once a plant has been removed. If a landowner clears a site without replanting, the risk of slips and damage to downhill sections is amplified. Compliance by a landowner may result in future liability, both to the landowner and the District, if damage does occur. 6. Compliance will impose a cost on a landowner who made a good faith decision to purchase land based on regulations in existence at the time. Imposition of compliance is effectively both a new tax on land ownership, and a new burden on all ratepayers to fund the District's expanded enforcement staff. 	<p>Accept in part. The pest conifer section has been rewritten to reflect great clarity regarding the adverse impacts to the region, reasons for inclusion, the rules and their explanations. The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitter is directed to this paper for the revised wordings.</p> <p>The proposed controlled areas rationale is clearly set out, as current operational areas and these are mapped.</p> <p>The issue of forestry slash as a polluter is an RMA 1991 matter and this point raised has been referred to elsewhere in Council to address.</p> <p>Pest legislation is aimed at pest removal and cannot compel anyone to re-plant a site after pest removal. However, this is a recommended outcome and officers are mindful to cover these points off during consultation around weed removal requirements.</p>	

		7. Your summary, and regrettably my submission, are not expressed in Plain English. If you are not content with the volume and quality of submissions you receive, you may consider eliminating the "consultant speak" and jargon from the summary and proposal.		
Joan Corry	19481	I support including wilding pines in the pest management plan, because they are a pest and it would be good to contain or get rid of them. For 20 years my husband manually pulled out seedlings of Pinus contorta on Mt Ruapehu/Tongariro National Park and they are still re-appearing. Need to contain them to stop them spreading – it is ongoing.	Support is acknowledged. Their inclusion in the RPMP is the first step and brings policy into line with Marlborough and Canterbury councils.	
One Forty One, PF Olsen and Tasman Pine Forests	19706	<p>Description and effects. We object to the description. It is emotive, and the matters are expressed in absolute terms and not based on fact in this region. This description is a cut and paste from national documents. There is no assessment of the issues for this region. There is no evidence that such conifers adversely impact recreation in the region. There is no evidence showing soil and soil fauna have been adversely altered in this region, that pastoral farming availability has been reduced, that water availability has been impacted and that such conifers create wildfire risks over and above any other vegetation in the region.</p> <p>In the Sapere Report (2022), with regard to availability of water, this region does not include a hydro catchment that may be impacted. There has been no assessment of the wildfire risk in this region and the same report advises that wildfires fuelled by wilding conifers are rare and require further research.</p> <p>Relief sought Delete the description or rewrite to take into account known regional impacts.</p>	<p>Accept in part. The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
One Forty One, PF Olsen	19707	Rule a. We object to this and the uncertainty provided by the definition of "clear land". Reasons for objection is: - the Review Proposal in foot note 9 page 41 admits that "low" or "very low	Accept in part. The pest conifer section has been rewritten to reflect great clarity regarding:	

<p>and Tasman Pine Forests</p>		<p>density” and “susceptible areas” are not defined, not mapped and that more work is required to be undertaken. This lack of defining means that the impact of the rule on any occupier is uncertain and cost benefits cannot be calculated.</p> <p>As non-compliance with rules can lead to prosecutions under the Biosecurity Act 1993 the extent of the application of a rule must be certain and not one which allows an authorised person to have the discretion to decide what is a susceptible area.</p> <p>The second to last sentence in the explanation of rule a. appears to indicate that the concept of susceptible areas could be any land, such as, production land. It is not clear what can be considered as production land as the New Zealand Planning Standards define rural production as including land not just for agriculture but for forestry.</p> <p>Relief sought</p> <p>The rule is deleted and reconsidered when the relevant work on the definition is undertaken, and any susceptible area is mapped.</p>	<ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
<p>One Forty One, PF Olsen and Tasman Pine Forests</p>	<p>19708</p>	<p>Rule b. We object to this rule, explanation and process. Reasons for objection include:</p> <p>The rule makes a forest owner liable for legacy trees, trees that for whatever reason adjacent landowners have chosen over the years not to destroy. The rule would capture trees of any age and trees that may have eventuated from wildings that a landowner has chosen not to deal with. So, any existing wilding within the Dept of Conservation estate, within State and Council Road corridors would be captured by this rule.</p> <p>Retrospective application for liability for wildings is unreasonable. Forest owners have had no legislative ability to</p>	<p>Accept in part. The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	

		<p>control how adjacent landowners have managed any wildings on their property.</p> <p>There is no definition of what a “valid” complaint would be. The information and data requirements of what would be valid have not been included.</p> <p>The explanation is confusing as to the date/age of the trees that fall within the scope of this rule. Is the forest owner liable for any wilding spread that occurs from 1 July 2024? The explanation only confuses the application of this rule.</p> <p>The four-step proposal dealing with legacy trees is unreasonable in that it is heavily in favour of any complainant. The adjacent landowner does not have to reach any agreement as they know that if no agreement is reached then the forest owner is liable. The process can lead to unreasonable behaviour. This is an unfair process and if the right of appeal cannot be included then there should be provision for an arbitrator to assist in the development of an agreement and ability for unreasonable demands to be discounted. The rule should not apply to trees existing at 1 July 2024.</p>	<p>The Joint Committee appreciates the time taken by the three parties to provide a revised rule B which has been included in the above paper.</p>	
<p>One Forty One, PF Olsen and Tasman Pine Forests</p>	<p>19709</p>	<p>Rules d and e. We object to the inaccurate mapping under these rules. Although we do not disagree with the rule, it is subject to mapping quality. The mapping we have seen to date is of a low standard and incorporates some plantation forest owners’ productive crop. If the rule is enforced based on poor mapping it could illogically require forest owners to remove significant amounts of tree crop on their land or force the forest owner and Management Agency to negotiate an agreement.</p> <p>Relief sought</p> <p>Over the duration of the Regional Pest Management Plan, with regard to the operational areas under current management set out in these rules that have been mapped in agreement with</p>	<p>Accept in part.</p> <p>More accurate mapping can (and has) been undertaken where an overlap with existing plantation boundary can be identified, However, there are places that are within plantation boundaries that have been cleared of pest conifers under the national programme and alteration of the maps based on boundary alone will not suitably address the management of pest conifer species within these estates.</p> <p>The rules and description of the pests have been revised to make it clearer that planted forest is not included in the rule stream.</p>	

		affected landowners (as shown in Maps 4.1, 4.2 and 4.31 and 4.32 in the Review Proposal) and prior to cone bearing.	The maps as they appear in the RPMP are accompanied with a statement that they are indicative use only and are not intended for definitive legal, location, or formal reference purposes. If required, current and accurate maps of boundaries can be supplied if and as required. Staff will continue to work with forestry companies to ensure the maps are as accurate and useful as necessary to enforce the intent of the rule.	
One Forty One, PF Olsen and Tasman Pine Forests	19710	<p>Alternate options. The proposed rules have not considered the changes in the regulation of forest owners with regard to the spread of wilding conifers. We object to the statement that the rules are necessary because government policy is encouraging an increase in afforestation in the region.</p> <p>While government policy provides for tree owners to enter into the ETS programme the tinkering with this programme, the excessive costs for being with the project (\$30/ha/per year) belie any concept that government policy is leading to more afforestation in the Region.</p> <p>The national planting figures for the region indicate that that there has, in the last five years, been very little increase to plantation forests in the region.</p> <p>The NES-PF and now NES-CF has major controls on consideration of the spread of wilding conifers. Regulation 11 requires an assessment using the wilding risk calculator of any conifer to be planted. The calculation must be made 8 months in advance of planting and provided to you, the councils. Under regulation 79(a) wilding risk calculations must be undertaken for any replanting and completed no more than 8 months prior to the replant.</p> <p>If a score exceeds a wilding tree risk calculator of 12 or more one cannot replant as a permitted activity, instead, one must apply for a resource consent. Under the 2023 changes to the NES-CF,</p>	<p>Accept in part. These statements have been revised.</p> <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	

		<p>afforestation and replanting management plans must also be undertaken and provided to the Council on request. We know of no afforestation or replanting of Douglas fir in the region since the introduction of the NES-PF in 2018.</p> <p>While this Review Proposal is undertaken under the Biosecurity Act 1993, we consider that the impact of the NES-CF on the risk management of the spread of conifers is applicable.</p>		
One Forty One, PF Olsen and Tasman Pine Forests	19711	<p>Cost benefit analysis. With regard to Rule b there has been no cost benefit analysis undertaken for this region. The Sapere Report (2022) was undertaken regarding removal of existing infestations and included infestations of all conifers, not ones related to Douglas Fir and Pinus radiata. It is a national report and the Councils have not taken its costings and assessed it against the regions' characteristics and Rule b. The Sapere report assists in supporting Rule a. The Sapere Report identified impacts on specially identified cultural sites. There has not been any identification of such sites under risk in this region. While irrigation is undertaken in the regions there has been no assessment of the risk of availability of water from existing infestations. The Sapere Report identifies the benefits of added further priority areas for control, but the Review Proposal and the cost benefit analysis does not advise of any such areas in the region. Accordingly, we cannot properly assess the relevance of the Sapere Report costs and benefits to this region and in particular the applicability of Rule b to assisting in the controlling of existing infestations.</p>	<p>Further analysis has been undertaken specifically relating to effects within the Tasman District and Nelson City catchments (Appendix 1 below). The analysis identifies that the benefits outweigh the costs.</p>	
Matt	19733	<p>Strongly support including pest and wilding conifers in the plan. These trees are creating a significant environmental and economic impact across the country including erosion and reduction in biodiversity. Active control is needed to encourage better land use from landowners and forestry companies alike.</p>	<p>Support is acknowledged. During deliberations the pest conifer policy has been further strengthened. The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	

<p>PJ Kenney</p>	<p>19746</p>	<p>The system seems to be working pretty well as is. Problem "Operational Areas" are being identified and dealt with. The new catchment area groups have money, volunteers and enthusiasm to help identify, report, and deal with incursions. Forestry companies, small growers association (NZFFA), consultants, forest managers, Te Uru Rakau, TDC and wood suppliers all seem to communicate very well when necessary and are generally aware of prospective problem areas.</p> <p>Eric Appleton notes Scion has stated if the current ban on genetic engineering were amended they could produce a sterile Douglas fir in 12 months. The current government has stated it will amend the law. There have been ideologies via political posturing and populist anti-pine sentiment that has confused issues but the general cooperative direction is positive. These changes may be throwing bureaucracy onto a problem that is solving itself and may cause divisiveness and disagreements in the future.</p> <p>More specifically:</p> <p>1/ In your rationale for inclusion of new rules, "neighbouring land occupiers should not be required to pay for or undertake pest control on their land through the actions or inactions of other parties". This implies someone else is responsible and should pay for eradication. This could lead to excessive over the fence responsibilities and disagreements. We have had more dramatic consequences with other noxious plants with no such draconian action.</p> <p>2/ In your proposed rules for outside "Operational Areas" a. "Occupiers of land that is clear or relatively clear of pest or wilding conifer must destroy any pest or wilding conifer on their land ...". This final judgement is left to some "authorised person", however, both radiata and Douglas fir are very valuable to farmers and small landowners in woodlots and shelter belts smaller than 1ha. There is now a promotional program around</p>	<p>Accept in part. The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
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		<p>the country by NZFFA and Te Uru Rakau promoting alternative species and there should be a genetical modified sterile Douglas fir very soon.</p> <p>b. "Occupiers of planted conifer forests greater than 1ha are liable for the costs for the removal of any wilding conifers on adjoining land within 200m of the planted forest property boundary.". This allows for undue responsibility on the plantation owner now and into the future as further development and/or land use philosophies collide. This is a severe disincentive to afforestation. These boundary discussions usually work out a local compromise and the threat of "going to law" seldom helps the situation.</p>		
Roger Frost	19765	<p>Strongly support and hope it can be extended in due course. Should there also be a restriction on planting fertile plants of these species within a defined distance of the specified areas (and subsequently all DOC or Conservation zoned land)?</p>	<p>Support is acknowledged.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
Fiona Ede	19774	<p>I am submitting on behalf of the Nature and Climate group of the Nelson Tasman Climate Forum.</p> <p>The group endorses the proposed RPMP rules as they are written.</p>	<p>Support is acknowledged. The submitter should note several important changes.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, 	

			<ul style="list-style-type: none"> issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
Tākaka Hill Biodiversity Group Trust	19775	<p>The feedback provided by the Tākaka Hill Biodiversity Group Trust (THBGT) on the Tasman Nelson RPMP Partial Review Proposal highlights several key points. Including ten conifer species in the pest conifer control program is a positive step towards sustainable control and preservation of native ecosystems. The Trust emphasises the importance of proactive measures and specific management strategies in safeguarding the environment for future generations.</p> <p>However, concerns are raised regarding the clarity and effectiveness of certain aspects of the proposal, such as ambiguous definitions, enforcement dilemmas, financial strains on occupiers, and the need for clear transitional criteria. The Trust advocates for clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual occupiers.</p> <p>Suggestions are also made for implementing an incentive-based approach to motivate occupiers to act in controlling wilding conifers, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations. The Trust underscores the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding conifers.</p> <p>Overall, the Trust's feedback emphasises the need for a collaborative and well-defined approach to effectively manage pest and wilding conifers, protect biodiversity, and address the</p>	<p>Support is acknowledged. The submitter should note several important changes.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> pest conifer definitions, adverse impacts specific to the region, reasons for inclusion, the five Plan rules and their explanations, issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	

		<p>challenges faced by land occupiers in the Tākaka Hill area and the region.</p> <p>Our feedback provides specific references to page numbers and headings in the T_NRPM Partial Review Document for clarification.</p>		
Chris Ecroyd	19786	<p>It should go much further. Pinus contorta and Douglas fir are the two species we should be most concerned about. Pinus contorta should be eradicated. It is not important as a commercial crop tree, produces cones from a very young age and the seed is windblown long distances. First priority should be to eliminate it from sites such as ridge tops where the seed is very readily blown long distances.</p> <p>New plantings of Douglas fir should be of selected provenances or strains which produce less seed and planting on ridge tops discouraged.</p>	<p>Support is acknowledged. Agreed that contorta and wilding D fir are the most problematic pines in the region. Contorta especially is being actively removed in the region. The NES-CF includes updated criteria for where any new D fir can be planted.</p> <p>The submitter should also note several important changes. The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
Michael North	19813	<p>I support these proposals for wilding conifer management. This is by far the most important part of this partial review, and the suggested rules are robust and will go a long way toward containment of wilding spread. They are entirely consistent with the polluter pays principle, which is sound. Wildings present an immense threat regionally and nationally to ecosystems, landscapes and productive land and this requires a strong response, which is met by these proposed rules.</p> <p>A) Clear Land Rule</p>	<p>Support is acknowledged. The submitter should note several important changes.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. 	

	<p>This is an important inclusion to retain existing landscapes relatively free of wildings. I see some issues with wording-</p> <p>Does 'clear or relatively clear' pertain to a particular point in time? If not, then how is TDC to know if a property that becomes worse than 'relatively clear', was not clear or relatively so at the time of these rules being implemented? – but which has deteriorated unchecked since that time, and so escapes this rule as it has become somewhat infested.</p> <p>How will 'relatively clear' be defined?</p> <p>The rule diagram for this rule is ambiguous as it refers to the area being a 'high value site'- high value for what? The phrase does not occur at all in the initial written rule definition, but crops up later in the Explanation of Rules, in the context of biodiversity. It is not helpful having such Explanations at the end of the text, rather than accompanying the earlier written rules themselves, as it means (in this case) that the definition is split into two separate sections of text.</p> <p>The initial definition of 'clear land' includes it being 'highly susceptible to wilding conifer spread'. How will this be decided? What is the threshold? Further, a site only moderately susceptible to infestation would evade this rule. Under the Explanation of the Rules an area need only be 'vulnerable' to wilding spread which is inconsistent with the earlier definition.</p> <p>Does the clear land rule and its interpretation pertain to an individual title, or to a neighbourhood or locality or landscape? I assume the former, but I don't think this is explicitly stated.</p> <p>B) Planted Conifer Forest Rule</p> <p>This is the most significant inclusion in this proposal, as plantations are the primary original source of most wildings, broadly speaking.</p> <p>How will this rule relate to legacy wilding infestations that date to well before the current owner's adjoining tenure? To be fair, it would be a big ask to expect a forest owner to mop up extensive mature wilding forests just outside their boundary</p>	<p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
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		<p>that clearly derived long ago from plantations on their current title. It may be that such a scenario outside of the existing management zones does not exist, in which case, my comment here is probably irrelevant.</p> <p>C) Pest Agent Rule</p> <p>This is an important inclusion as it covers smaller areas of forest not included under B. The remedy of source tree removal seems only fair in such a scenario.</p> <p>D) Maintain the Gains Rule</p> <p>This is critical to keep managed areas clear into the future, but how and by whom will it be monitored? Is a complaint required to trigger this rule, or will it be triggered by monitoring?</p> <p>How will a new purchaser of a property within one of the management zones know about their wilding conifer responsibilities? Will it appear on a LIM?</p> <p>E) Good Neighbour Rule</p> <p>Presumably a complaint is required to trigger this rule, but this is not stated. This rule seems fair and reasonable.</p>		
Robert	19822	<p>Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.</p>	<p>Support is acknowledged. The submitter should note several important changes.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
Robert	19810	<p>Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.</p>		

DOC	n/a	<p>Support rules a, b, c, and e:</p> <p>In relation to rule a, commit to mapping or otherwise defining criteria for identifying areas that are ‘highly susceptible to wilding conifer spread’, within 12 months of the RPMP amendments being adopted, and make this information available on the Councils’ websites.</p> <p>Support in principle rule d:</p> <p>In relation to rule d, clarify the ‘agreed level of work’ and ‘agreed control targets’ used to facilitate transition from nationally/regionally funded control programmes to individual land managers.</p>	<p>Support is acknowledged. The submitter should note several important changes.</p> <p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p> <p>Relief sought regarding rule d - the references made here are in relation to the national programme. MPI sets the MU operational control expectations, including when areas are able to be transitioned to land occupiers for ongoing control.</p>	
Forest and Bird - National Office	n/a	<p>Forest & Bird support progressive containment of wilding conifers, the conifer species in the pest conifer and wilding conifer control programmes, and the suggested rules around landowner responsibilities.</p> <p>Requirements for forest owners to manage wilding conifers 200m into neighbouring properties is sensible and fair.</p>	Support is acknowledged.	
Brook Waimārama Sanctuary	n/a	<p>Fully agree. A timely and excellent proposed change of the current RPMP. This is of particular importance to the BWST as we are progressing to achieve zero densities of conifers within our leased area. This proposed change to the RPMP will help to achieve and maintain eradication of wilding conifers within the Brook Waimārama Sanctuary by significantly reducing the reinvasion risk from neighbouring stands of conifers.</p>	Support is acknowledged.	
Jo Ritchie (Wilding Pine)	19826	<p>1. We share THBT’s concerns “regarding the clarity and effectiveness of certain aspects of the proposal, such as</p>	Support is acknowledged. The submitter should note several important changes.	

<p>Network – WPN)</p>		<p>ambiguous definitions, enforcement dilemmas, financial strains on landowners, and the need for clear transitional criteria”. We support advocating for “clear guidelines, communication, support, and monitoring mechanisms to ensure the smooth and effective transition of control responsibilities from the Management Agency to individual land occupiers.</p> <p>2. We support THBT’s suggestion for an “incentive-based approach to motivate land occupiers to act in controlling wilding pines, including financial incentives, technical support, long-term planning assistance, access to resources, and flexibility in regulations”. The carrot before the stick approach is central to both securing and sustaining widespread community support but also to effectively educate and inform both the community and landowners of the risk that wilding pines and conifers present to biodiversity, productive and natural landscapes, and hydro-generation. The recently released Environment Canterbury Wilding Pine Control Handbook Wilding pine control handbook Environment Canterbury (ecan.govt.nz) is a very good example of this approach.</p> <p>3. THBT also emphasises the importance of addressing limitations in the rules, ensuring stakeholder engagement, and considering a comprehensive assessment of costs, benefits, and risks associated with managing pest and wilding pines.</p> <p>We support this statement because it is important a) to have the ‘stick’ when the ‘carrot’ fails and b) because to get stakeholders on board they need to be fully informed and supported throughout the life cycle of wilding management which often requires repeat visits to achieve effective control.</p> <p>WPN would also like to make 2 additional comments:</p> <p>I. We support the inclusion of a wider list of pine species that can become wildings if left unmanaged. We also support maintaining the gains of prior investment in control work and the introduction of the two new rules in the RPMP amendment but suggest that these need to go further. Limiting exacerbators to those with already planted forests is a reactive approach.</p>	<p>The pest conifer section has been rewritten to reflect great clarity regarding:</p> <ul style="list-style-type: none"> • pest conifer definitions, • adverse impacts specific to the region, • reasons for inclusion, • the five Plan rules and their explanations, • issues around mapping of operational areas. <p>The revised policy is contained in a separate paper to be considered by the Joint Committee of both councils and the submitters are directed to this paper for revised wordings.</p>	
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Laurien Heijs	19827	I support the Regional Pest Management Plan review and inclusion of all species proposed.	Support is acknowledged.	
Project De-Vine Environmental Trust	Late	Support the change. We appreciate the support towards our feral cat programme in our East Mohua Trapping Collective in Golden Bay and hope the RPMP will spur other landowners onto wanting to control the feral cats visiting their properties.	Support is acknowledged.	
Pest wilding conifers – Mt Richmond Management Unit				

Julie McIntock	19221	Good. Need to make sure rules are obeyed and if not prosecution must happen	Support is acknowledged.	
Trevor James	19268	Totally support more strict rules on this. I think option c is best. Option c should be applied to Silver Birch in St Arnaud as well, given its major adverse effect on surrounding wetlands.	Support is acknowledged.	

Appendix 1: Results of interrogation of Landcare Research Model on the effect of stopping the spread of wilding conifers in currently affected catchments of the Tasman District and Nelson City

<https://wildingconifers.landcareresearch.co.nz>

- The extrapolation runs from 2020 to 2041.
- Visualises the benefits of acting now to prevent future wilding conifer spread
- The return on investment (ROI) includes the cost of control

Catchment	ROI at 2041	Ecosystem Loss Prevented (parts per billion)	Water Yield Gain	Erosion Reduction benefit	Pastoral Productivity gain	Head fire Intensity 2027 scenario	Head fire Intensity 2041 scenario	Discussion head fire intensity
Buller / Longford Catchment	1.18	0.05	2.26	3152.5	36080	560.5	1064	Increases but does not change tactic
Buller / Rotoiti	451	0.01	0.03	101.4	1024.6	857.3	1741	Increases but does not change tactic
Motueka R / Gorge Catchment	1.52	0.37	47.7	18793	1771.4	1225	1081	Decreases but does not change tactic
Motueka R / Woodstock Catchment	0.87	0.03	1.74	784.97	1863.5	1142	1694	Increases but does not change tactic
Wangapeka R / Swingbridge	75.5	0.05	3.76	5473.3	1870.1	7721	7592	Decreases but does not change tactic
Waimea R Catchment	1.23	0	2.42	0	0	411.3	338.9	Decreases but does not change tactic
Wairoa / Gorge Catchment	1.04	0.06	7.51	0	15064	533.6	472.8	Decreases but does not change tactic
Takaka R / Harwoods	1.27	0	0.07	0	0	111.9	579.5	Increases and changes tactic
Marahau R Catchment	30	0.03	5.56	0	18974	6104	6256	Increases but does not change tactic
Takaka R Catchment	43.7	0.08	0.85	0	47752	6237	6570	Increases but does not change tactic
Wainui R Catchment	4.02	0.15	14.3	0	94138	12610	12550	Decreases but does not change tactic
Parapara Inlet Catchment	479	0	0	0	0	2480	2480	Stays the same
Pakawau Inlet Catchment	80.4	0.01	0.56	0	2022.4	3702	3531	Decreases but does not change tactic
Farewell Spit Catchment	169	0.05	0.18	0	15182	2940	3020	Increases but does not change tactic
Average Return on Investment	95.695							

Explanation	
Catchment:	A portion of a river catchment as displayed in the Landcare Research Wilding Conifers Scenario Exploration model. The data presented is for catchments with infestations as identified in the model. All other catchment values are zero.
Ecosystem Loss Prevented (biodiversity benefit index):	An index calculated on the averted loss of indigenous cover that would otherwise be caused by infilling of wilding conifers within a currently invaded 1kmx1km grid square. Any number > 0.0 is a net benefit
Water Yield Gain (percentage):	Percentage increase in water yield in each catchment due to prevention of infilling and wilding conifer removal. Any number >0 is a net benefit.
Erosion Increase (tonnes)	The increase in erosion caused by the reduction in infilling (it assumes the control site is replaced in non-forest land cover). Any number > zero is a cost (in tonnes of sediment per year).
Pastoral Productivity (stock units)	The net effect of wilding conifer removal on livestock carrying capacity expressed as stock units. Any number > 0 is a net benefit
Head fire intensity (kW / M):	The quantum of the head fire intensity under future wilding conifer density. Based on a hypothetical fire climate scenario, the researchers cited (Clifford, Paul & Pearce (2013), identify that medium height scattered wildings would pose the most serious fire hazard (highest spread rates and intensities) across all the fire danger levels (low to extreme). This indicator within the Landcare Research site is based on present density and infilling over time, not based on the outcome of wilding control. The index could therefore go up or down over time depending on maturation beyond the most risky stages. For this analysis then, the 2027 intensity and the 2041 intensity are provided along with a synopsis on whether the risk gets better or worse in the context of change in firefighting action.
Discussion head fire intensity	The head fire intensity a key determinant of firefighting action. Values above 4000: Head fire attack is likely to be ineffective. Values 2000-4000: head fire attack using aircraft and fire retardants. Values 500-2000: Water under pressure and heavy machinery.

Commentary:

For all currently infested catchments, most show a good return on investment if infilling is prevented. The biodiversity value (loss averted), water yields gains, and productivity gains are all positive. The erosion (sediment yield) in some catchments is a cost, but generally neutral / zero. The fire hazard (fire intensity) is interesting as it is the only aspect of the model that assumes no control and the value goes up for some catchments and down for others - depending on density.

On the basis of these data it can be stated categorically that there are regional benefits to biodiversity, water yield, and stock carrying capacity that can be realised from control. There is a potential cost in the form of the erosion protection services that woody vegetation provides, assuming that conifer removal is for the non-forest (e.g. pastoral) benefits. Firefighting strategy lies largely unchanged although one catchment (Takaka at Harwoods) where the continued infilling of pines presents an increase in fire intensity that changes the firefighting tactic. For all the other catchments, the values are zero - i.e. there is no benefit in controlling wilding pines where they don't exist.