

## Regional Pest Management Plan Council Decisions by Section

### Section: General

Submission Number:	1: 1	Submission Type:	Support
Submitter:	William Reaney		
Submission Summary:	Do not put cats into a pest category.		
Decision Sought:	Do not include cats in the RPMP.		
Council Decision:	Accept in Part		
Reasons:	<p>CBA suggests it is cost-beneficial to manage feral cats in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest and its ability to impact on the region.</p> <p>Feral cats are included as an Advisory pest in Appendix 1. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	2: 2	Submission Type:	Not Applicable
Submitter:	Maru Tapsell		
Submission Summary:	Ban 1080		
Decision Sought:	Do not support use of 1080		
Council Decision:	Not Applicable		
Reasons:	The RPMP does not include detail on how pests should be managed. The methods to manage pests are outside the scope of the RPMP.		
Submission Number:	4: 6	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Climbing Dock (Rumex Sagittaus) - the seed is spread by wind and it is highly invasive.		
Decision Sought:	Recategorise Climbing Dock (Rumex Sagittaus) and include in the RPMP.		
Council Decision:	Reject		
Reasons:	<p>While marginally cost beneficial, climbing dock was included as an Advisory pest. There is limited data on this species and Council does not believe it is highly invasive. It is also an Advisory pest in the Waikato RPMP.</p> <p>Climbing dock is included as an advisory pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 7	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Moth plant is spread by wind and it is highly invasive.		
Decision Sought:	Recategorise Moth plant and include in the RPMP.		
Council Decision:	Reject		

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Reasons:	<p>Cost benefit analysis has determined that inclusion of Moth plant in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Moth plant be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>Moth plant is included as an Advisory pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 8	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Taiwanese cherry seed is spread by birds and it takes over. It is highly invasive.		
Decision Sought:	Recategorise Taiwanese cherry and include in the RPMP		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis has determined that inclusion of Taiwanese Cherry in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Taiwanese Cherry be managed under Council's site led approach to protect high value sites including programmes such as Environmental Programmes and Coast Care.</p> <p>Taiwanese Cherry is an Advisory pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 9	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Wondering Dew ( <i>Tradescantia fluminensis</i> ) is highly invasive and smothers all plants.		
Decision Sought:	Recategorise Wondering Dew ( <i>Tradescantia fluminensis</i> ) and include in the RPMP.		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis suggests it is cost-beneficial to include Tradescantia in the sustained control programme, however, Council's assessment is that managing the pest would require significant resources and is likely to have minimal impact on the pest and its ability to impact the region.</p> <p>Several biocontrol agents have been released and it is hoped in time they will have a significant impact on the pest.</p> <p>It is recommended that Tradescantia be managed under Council's site-led approach to protect high value sites including programmes such as Environmental Programmes and Coast Care.</p> <p>Tradescantia is included as an advisory pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 10	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Include Blue Morning Glory (see submission point 4.10)		
Decision Sought:	Include Blue Morning Glory (see submission point 4.10)		
Council Decision:	Reject		

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Reasons:	<p>Cost benefit analysis has determined that inclusion of Blue Morning Glory in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Blue Morning Glory be managed under Council's site-led approach to protect high value sites. Blue Morning Glory is included as an advisory pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 11	Submission Type:	Oppose in Part
Submitter:	Martin and Jane Munro		
Submission Summary:	Include Climbing Dock (Rumex Sagittaus) - see submission point 4.6		
Decision Sought:	Include Climbing Dock (Rumex Sagittaus) - see submission point 4.6		
Council Decision:	Reject		
Reasons:	<p>While marginally cost beneficial, climbing dock was included as an Advisory pest. There is limited data on this species and Council does not believe it is highly invasive. It is also an Advisory pest in the Waikato RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 12	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Include Moth Plant (see submission 4.7)		
Decision Sought:	Include Moth Plant (see submission 4.7)		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis has determined that inclusion of Moth plant in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Moth Plant be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care. Moth plant is included as an Advisory pest in the RPMP in recognition of the significance of the pest in the region. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	4: 13	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Include Taiwanese Cherry (see submission 4.8)		
Decision Sought:	Include Taiwanese Cherry (see submission 4.8)		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis has determined that inclusion of Taiwanese Cherry in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Taiwanese Cherry be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care. Taiwanese Cherry is an Advisory Pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		

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Submission Number:	4: 14	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Include wondering dew ( <i>Tradescantia fluminensis</i> ) - see submission 4.14		
Decision Sought:	Include wondering dew ( <i>Tradescantia fluminensis</i> ) - see submission 4.14		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis suggests it is cost-beneficial to include <i>Tradescantia</i> in the sustained control programme, however, Council's assessment is that managing the pest would require significant resources and is likely to have minimal impact on the pest and its ability to impact the region.</p> <p>Several biocontrol agents have been released and it is hoped in time they will have a significant impact on the pest.</p> <p>It is recommended that <i>Tradescantia</i> be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care. <i>Tradescantia</i> is included as an advisory pest in the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	5: 3	Submission Type:	Support
Submitter:	Lakes Water Quality Society		
Submission Summary:	Support purpose of Biosecurity Act.		
Decision Sought:	Retain reference to Biosecurity Act purpose.		
Council Decision:	Comment noted		
Reasons:	Retain reference to Biosecurity Act purpose		
Submission Number:	5: 5	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	LINZ responsibilities for the restoration of the Rotorua Lakes under the Deed of Settlement with Te Arawa is not cited and should be included.		
Decision Sought:	LINZ responsibilities for the restoration of the Rotorua Lakes under the Deed of Settlement with Te Arawa is not cited and should be included.		
Council Decision:	Accept in Part		
Reasons:	<p>Land Information New Zealand (LINZ) administers vacant and non-rateable land. LINZ also has responsibility for unalienated Crown land in the region, surplus railway land and management of the lakeweeds attached to the lake bed on behalf of the Crown under the Deed of Settlement. LINZ has confirmed their intent to manage pests within the Bay of Plenty region. Section 2.2.5 of the RPMP references LINZ's responsibilities for lakeweed management under the Deed of Settlement. Added wording to LINZ responsibilities in Section 3.4 of the RPMP.</p>		
Submission Number:	7: 1	Submission Type:	Seek Amendment
Submitter:	Don & Judy Stotter		
Submission Summary:	Support Submission #5. I have fished on Lake Rotorua since 1975. I fish from a small boat and clean out my boat after each fishing trip. I'd be happy to comply with submission #5 additional rule.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for Submission #5 noted.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	8: 3	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Include feral cat, possum, Norway rat, and mustelids in a pest category. It is not tenable, that with the Government supporting PF 2050, BORC is not categorising these species as significant pests whose control/eradication is crucial to the environmental and economic wellbeing of the country. See submission 8.4		
Decision Sought:	Include feral cat, possum, Norway rat, and mustelids in a pest category.		
Council Decision:	Reject		
Reasons:	<p>Feral cat - Cost benefit analysis (CBA) suggests it is cost-beneficial to manage feral cats in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest and its ability to impact on the region.</p> <p>Possums – CBA provides clear direction that it is not cost beneficial to manage possums due to their widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that possums be managed under site-led programmes such as Environmental Programmes and Coast Care.</p> <p>Norway Rat - CBA indicates it is not cost beneficial in managing Norway rats due to the widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that Norway rats be managed under site-led programmes such as Environmental Programmes and Coast Care.</p> <p>Ferrets and Weasels - CBA indicates a strongly negative cost benefit in managing ferrets and weasels due to the widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that these pests be managed under site-led programmes such as Environmental Programmes and Coast Care.</p> <p>Stoats - CBA suggests it is cost-beneficial to manage stoats in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest and its ability to impact on the region.</p> <p>Feral cats, rats, mustelids and possums are included in Appendix 1 (Advisory pests). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	8: 5	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Include Beggars Tick - <i>Bidens pilosa</i> , and Sea Couch - <i>Elytrigia pycnantha</i> in non-RPMP pests. These are pests that are spreading rapidly and by including them in the non-RMP pest section you raise awareness of them as a problem.		
Decision Sought:	Include Beggars Tick - <i>Bidens pilosa</i> , and Sea Couch - <i>Elytrigia pycnantha</i> in non-RPMP pests.		
Council Decision:	Accept in Part		
Reasons:	<p>Beggars Tick has been included as an advisory pest in the RPMP.</p> <p>Council could not find much information to support the inclusion of sea couch and it is not considered highly invasive.</p>		

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Submission Number:	8:6	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Include Canna Lily - <i>Canna indica</i> in the Non-RPMP pests. This species is very similar and at least as harmful as wild ginger, which is on the Non-RPMP pest list. This should also be included to raise awareness, and maybe stop them being sold in garden centres.		
Decision Sought:	Include Canna Lily - <i>Canna indica</i> in the Non-RPMP pests.		
Council Decision:	Accept		
Reasons:	Canna Lily has been added to Appendix 1 (Advisory Pest). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.		
Submission Number:	8: 7	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Include Hedgehog <i>Erinaceus europaeus</i> in non-RPMP pest. Hedgehogs are a significant pest being serious predators of all smaller ground-nesting birds as well as reptiles and in some cases amphibians. A greater threat than mouse to these species.		
Decision Sought:	Include Hedgehog <i>Erinaceus europaeus</i> in non-RPMP pest.		
Council Decision:	Accept		
Reasons:	Hedgehog has been added to Appendix 1 (Advisory pests). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.		
Submission Number:	10: 3	Submission Type:	Oppose
Submitter:	Jean-Paul Thull		
Submission Summary:	I have been struggling for years with woolly nightshade... a plant causing health risks and spreading like mad thanks to our active bird population carrying the seeds. As an example, I spent 4 years to clear a 200m gully from pest plants and while working in one area woolly nightshades grew up to 8m high (2.5m-3.5m per year). Having eradicated them in early 2017, I probably pulled out over 500 seedlings over the last 6 months that came from neighbouring properties. Looking carefully at your proposal and taking woolly nightshade as an example, I am under the impression that you produced a highly academic information booklet written by analysts sitting behind their computer screen, not understanding the dynamics of plant growth and human nature when it comes to complaints.		
Decision Sought:	WNS should not be allowed to get out of control.		
Council Decision:	Reject		
Reasons:	Cost Benefit Analysis indicates progressive containment throughout the region is not cost-beneficial, except in some areas where distribution is low. A rule focused on boundary control at adjoining compliant properties has been included due to community will to continue investing in controlling this species.		
Submission Number:	15: 3	Submission Type:	Seek Amendment

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Northland Regional Council
Submission Summary:	<p>Generally support however we oppose the exclusion of Kauri Dieback disease from being listed as a pest species. Land owners / occupiers / managers / users (as relevant) within BOP must implement the approved kauri dieback management plan to reduce the risk of kauri dieback spreading.”</p> <p>These rules were the result of an environment court ruling. A national plan is likely to be more than a year away, inclusion of this disease could add value to creation of a national plan.</p> <p>Support inclusion of animal pest species especially marine species and wallaby. Wallaby are a significant concern to Northland and BOP efforts to respond to introductions of wallaby and spread is supported by NRC.</p> <p>Commend the inclusion of a number of pest plant species.</p>
Decision Sought:	<p>The following pest species should be listed; Kauri Dieback disease (Phytophthora agathidicida (PA)) as a sustained control species with the following rule: “Every person who sees or suspected the presence of Kauri Dieback shall report the sighting to council or appropriate management agency. “</p> <p>“1. Authorised persons will determine whether a property is "high risk" by having regard to:</p> <ul style="list-style-type: none"> <li>• Site status - Is it a confirmed or likely site?</li> <li>• Site location - Is it close to known kauri dieback site(s)?</li> <li>• Vectors - Is there a high likelihood of spread to or from the site?</li> <li>• Any other relevant factors.</li> </ul> <p>2. Where the property is identified as "high risk", an approved kauri dieback management plan shall be prepared by the authorised person in consultation with the occupier / owner / manager / user (as relevant).</p> <p>3. The minimum criteria for an approved kauri dieback management plan are:</p> <p>All kauri dieback management plans developed under this RPMP must contain the following criteria:</p> <ol style="list-style-type: none"> <li>1. Description (site name, site location, soil sample numbers and other identification details)</li> <li>2. Plan objectives to prevent or minimise the spread of kauri dieback</li> <li>3. Risk factors <ol style="list-style-type: none"> <li>a) Proximity to other kauri;</li> <li>b) Proximity to other infected sites</li> <li>c) Vectors to infection;</li> </ol> </li> <li>4. Measures to be adopted: <ol style="list-style-type: none"> <li>a) Vector risk mitigation i.e. phytosanitary measures, access limitations, control of feral animals, any other detailed steps;</li> <li>b) Obligation of landowner, occupier, manager, user as relevant;</li> <li>c) Parameters and measures to ascertain whether objectives are being achieved;</li> </ol> </li> <li>5. Monitoring and review</li> </ol>
Council Decision:	Reject
Reasons:	<p>When the RPMP was being developed, a National Pest Management Plan was being developed to manage kauri dieback. Despite this, at this stage no government funding has been committed for implementing this plan.</p> <p>Council has a role to play in supporting lead agencies to manage national pests. This is supported by our strategic direction and kauri dieback is included in the RPMP as an advisory pest. Kauri dieback has been declared by government as an 'unwanted organism' and is subject to the relevant provisions under the Biosecurity Act 1993. The majority of natural kauri in the Bay of Plenty is on Department of Conservation estate. Council staff currently do random soil testing for kauri dieback and engage with landowners who have kauri stands on their private property, encouraging them to fence off the Kauri from known vectors of spread. The landscape for managing and funding kauri dieback is changing. BOPRC are keen to work with Northland Regional Council and other North Island regional councils on a regionally led programme for Kauri dieback.</p>
Submission Number:	18: 1
Submission Type:	Oppose

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Waihi Beach Environment Society
Submission Summary:	<p>Include Agapanthus, climbing asparagus, coastal banksia, Japanese Spindle tree, Marram Pampas, Salt water paspallum velvet groundsel as containment pests</p> <p>Exclusion would destroy the years of dune work undertaken by our group + other volunteers. The plan admits for example velvet groundsel shades out other species. If not controlled it has the potential to become widespread in our dunes. It was Northland Regional Council's "weed of the month" a few years ago.</p> <p>Exclusion of for example the lily species has the potential to curtail land based weed control as at Broadland Block, Waihi Beach.</p> <p>The advice that Council will still have an advisory role if the plant is not included in this RPMP in effect is placing the onus on volunteer groups to do either 100% of the work or walk away from any such volunteering.</p>
Decision Sought:	Include Agapanthus, climbing asparagus, coastal banksia, Japanese Spindle tree, Marram Pampas, Salt water paspallum, velvet groundsel and others as containment pests - see submission 18.2
Council Decision:	Accept in Part
Reasons:	<p>Agapanthus – Cost Benefit Analysis (CBA) indicates that it is barely cost beneficial to manage agapanthus and data is limited and it could be a large underestimate in terms of species distribution and rate of spread. In addition, agapanthus is not a National Plant Pest Accord (NPPA) plant therefore still available for sale legally in the region.</p> <p>Climbing asparagus – Now included as a sustained control pest. The CBA results for progressive containment are slightly more positive, however Council's assessment is that progressive containment is not achievable over the life of this RPMP.</p> <p>Coastal banksia – CBA indicates that it is not cost beneficial to include in the RPMP. It is recommended that coastal banksia be managed under our site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>Japanese spindle tree – CBA indicates it is not cost beneficial to include in the RPMP. It is recommended that the pest be managed under Council's site-led programmes such as Environmental Programmes and Coast Care.</p> <p>Marram – CBA has determined that inclusion of marram in the RPMP management programmes is not cost-beneficial. The pest only impacts dune systems and is currently under active management through the Coast Care programme at sites of significance. It is recommended that this management approach continue.</p> <p>Pampas – CBA has determined that management under most scenarios were not cost beneficial. Pampas is common around the region so would have a high cost to manage. It is recommended that pampas be managed under our site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>Salt water paspalum – CBA has determined that management under most scenarios were not cost beneficial. The impact of the pest is localised to the coastal environment. It is recommended that this pest is managed under our site-led approach to protect high value sites such as Coast Care.</p> <p>Velvet groundsel – CBA has determined that inclusion of velvet groundsel in the RPMP is not cost-beneficial. It is recommended that this pest is managed under our site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>Agapanthus, coastal banksia, Japanese spindle tree, Marram, Pampas. Salt water Paspallum and Velvet groundsel are already included in the RPMP as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>

Submission Number:	18: 2	Submission Type:	Seek Amendment
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## Regional Pest Management Plan Council Decisions by Section

Submitter:	Waihi Beach Environment Society
Submission Summary:	
Decision Sought:	Include Non RPMP pests in RPMP
Council Decision:	Accept in Part
Reasons:	<p>For a specific pest to be included in the RPMP, Council must be satisfied the proposal has merit as a means of eradicating or effectively managing the pests. Put simply Council must be satisfied it has the resources to manage the pest and the pest management outcome can be achieved over the life of this RPMP.</p> <p>Non-RPMP pests are now named Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>

Submission Number:	21: 11	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	Wallaby have to be the easiest of all pests to eradicate. It is doable and for the sake of our understory, it is necessary. They need to go on the eradication list. Let me know if you want a strategy.		
Decision Sought:	Reclassify wallabies as an eradication pest.		
Council Decision:	Accept in Part		
Reasons:	A split pest management programme for wallabies that includes wallabies as a progressive containment pest inside the core infestation area and as an eradication pest outside the core infestation area. A new map showing the pest programme boundaries has been included as Map 11 in the RPMP. A split programme reflects Council's actual management approach with increased efforts to manage wallabies outside the core infestation area.		

Submission Number:	22: 1	Submission Type:	Oppose
Submitter:	Eastern Region Fish & Game Council		
Submission Summary:	Fish and Games submission relates to the inclusion of legally scheduled sports fish species (perch and tench) in the PRPMP, and the specific duties, actions and responsibilities specified for those species. Sports fish have a special statutory classification status and management framework that overrides the provisions of the PRPMP.		
Decision Sought:			
Council Decision:	Accept in Part		
Reasons:	<p>Following text added to section 2.2.5:</p> <p>While perch and tench are defined as pests under this Plan it is acknowledged that they are also 'sports fish' under Part 5A of the Conservation Act 1987. Fish and Game are responsible for managing sports fish under the Conservation Act and the associated Freshwater Fisheries Regulation 1983. The taking or killing of any sports fish is managed through Angler's Notices developed by Fish and Game annually under this legislation or by special license issued by Fish and Game under section 4A of the Freshwater Fisheries Regulation 1983.</p> <p>Council will engage with, and seek to work in collaboration with Eastern Fish and Game to manage any perch or tench in the Bay of Plenty that present due to any release that has not been legally authorised under either section 26ZM of the Conservation Act or Regulation 62 of the Freshwater Fisheries Regulation.</p>		

Submission Number:	23: 1	Submission Type:	Seek Amendment
Submitter:	LakeTarawera Ratepayers' Association		
Submission Summary:	Support Submission #5.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		

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Reasons:	Support for submission #5 noted.		
Submission Number:	24: 1	Submission Type:	Seek Amendment
Submitter:	Peter & Lesley Stevenson		
Submission Summary:	Support Submission #5.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		
Submission Number:	25: 1		
Submitter:	Gregg Brown		
Submission Summary:	<p>Support Submission #5. What we have been doing this far has proven to be insufficient to stop the spread of invasive weeds and aquatic pests. Accordingly, we have to do something quite different. The idea proposed by LWQS seems like a logical next step without being overly burdensome to boat owners.</p> <p>I encourage BOPRC to give this submission serious consideration.</p>		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		
Submission Number:	26: 1	Submission Type:	Seek Amendment
Submitter:	Bill & Annette Cleghorn		
Submission Summary:	Support Submission #5.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		
Submission Number:	27: 10	Submission Type:	Support in Part
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Supporting Document from page 78. This supports wild kiwifruit as a Progressive Containment pest which is what KVH/NZKGI support and request.		
Decision Sought:	Support/agree with the positive cost-benefit result for wild kiwifruit (in the 50-year assessment) as a Progressive Containment pest for the BOP region.		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	31: 12	Submission Type:	Oppose

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>The Operative RPMP has a list of 96 plant pests (excludes Agency spp.); whereas the RPMP has listed only 42 pest plants in Table 1. With the addition of the Non-RPMP pests listed at Appendix 1 it's noted that eight of the plant species that are presently in the Operative RPMP do not appear in either Table 1 or Appendix 1 of the proposed RPMP - (namely: Californian bulrush, Firethorn, Lilium formosanum, Mexican feature grass, Rum cherry, Selaginella, Shield pennywort, Wonder tree).</p> <p>There are several other pest plants which trigger the relevant sections of the Biosecurity Act 1993, but they have been relegated to Non-RPMP pests at Appendix 1. WBOPDC supports the pest status of all the pest organisms that are listed in Table 1 and we have no objection to the eight abovementioned plant species not having a pest status in the proposed RPMP, however clarity is needed on what led to their removal.</p> <p>In the context of the RPMP, there has been a comprehensive Analysis (CBA) undertaken by Wildland Consultants for each subject (pest organism/pest) contained within the proposed plan which clearly shows the benefits of its inclusion in the plan would outweigh the costs, after taking account of the likely consequences of inaction or other courses of action. It is evident from the CBA that all pests assessed and included in the RPMP score at or below Level 4 of the Infestation Curve.</p> <p>However, there has been no CBA provided for pests that are not included in the body of the RPMP (the non-RPMP pests and those pests listed in the Operative Plan but not in the proposed RPMP). It would appear that a subjective evaluation has been made to exclude from the RPMP any pest species that might score above Level 4 of the Infestation Curve.</p> <p>We submit that such an arbitrary decision to exclude those pests would have no CBA foundation and would appear to be weighted in favour of reducing regional costs over the relatively short term.</p> <p>We submit that all serious plant pests, not just those examples in Appendix 1, should be included in the body of the RPMP. Alternatively, if those same pests are not included in the body of the RPMP then they should have meaningful and effective management actions ascribed to them within Appendix 1. Without this, we submit the RPMP does not adequately reflect BOPRC's Regional Policy Statement (in particular the matters of national importance - MN 1B, MN 2B and MN 4B).</p>		
Decision Sought:	Inclusion of additional pest species and/or comprehensive cost- benefit analysis (CBA) to demonstrate why they have not been included.		
Council Decision:	Accept in Part		
Reasons:	<p>CBAs are not required for pests not included in the RPMP. It is not practicable to undertake a CBA for every possible pest. CBAs were undertaken for some pests that Council was considering for inclusion but then weren't included for various reasons including CBA results, cost of management or achievability of pest management objectives.</p> <p>Formosa Lily is already included as an advisory pest. Californian bulrush, Selaginella, Mexican feather grass and Firethorn have been added as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p> <p>Rum cherry, Shield pennywort, Wonder tree have not been added as they are not managed elsewhere in NZ and are not considered highly invasive.</p>		
Submission Number:	31: 18	Submission Type:	Seek Amendment
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>WBOPDC takes a firm stance on the reduction in priority of any pests, compared to the current operative plan. We note that wild kiwifruit, woolly nightshade and wild ginger, are all currently containment pests and were expected to be destroyed on all land occupied. We are disappointed to see these as sustained controlled pests in the proposed RPMP.</p> <p>We are pleased to see Kiwifruit Vine Health committed to funding in part the control of the species. We support the continuation of this approach.</p> <p>WBOPDC spends a significant sum on controlling pests on our land and in particular in the road reserve and has had substantial success. We do not wish to see this work undone. We request that wild kiwifruit be included in the progressive containment programme region wide.</p>		
Decision Sought:	That wild kiwifruit be made a progressive containment pest region-wide.		

## Regional Pest Management Plan Council Decisions by Section

Council Decision:	Accept
Reasons:	Wild kiwifruit is now a progressive containment pest for the region.
Submission Number:	36: 1
Submission Type:	Seek Amendment
Submitter:	Craig Morley
Submission Summary:	Support Submission #5.
Decision Sought:	Include additional rule as proposed by submitter #5.
Council Decision:	Comment noted
Reasons:	Support for submission #5 noted
Submission Number:	37: 1
Submission Type:	Seek Amendment
Submitter:	Lani Kereopa
Submission Summary:	Support Submission #5. We need to make boaties accountable for entering our lakes & ensuring they are not doing damage by the spreading of pest species.
Decision Sought:	This strategy would be a good starting point.
Decision Sought:	Include additional rule as proposed by submitter #5.
Council Decision:	Comment noted
Reasons:	Support for submission #5 noted

## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	38: 1	Submission Type:	Seek Amendment
Submitter:	Jan Graham		
Submission Summary:	Support Submission #5. The only way to protect our lakes from the aquatic pest weeds and pest fish is by ensuring that all boats entering the lakes are obliged to be certified. Efforts to prevent the spread of pest weeds and fish have failed – we must change our approach if we are to be successful in stopping pest incursions in our lakes. LWQS believe this is best done through a self-certification process as submitted.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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Submission Number:	39: 1	Submission Type:	Seek Amendment
Submitter:	Bob & Cynthia Armstrong		
Submission Summary:	Support Submission #5. We refer to the submission by the Lakes Water Quality Society that seeks protecting our lakes from the aquatic pest weeds and pest fish by ensuring that all boats entering the lakes are obliged to be certified.		
	We both support the submission.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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Submission Number:	40: 1	Submission Type:	Seek Amendment
Submitter:	Stuart Corson		
Submission Summary:	Support Submission #5. I wonder if there is benefit in adding the word “engine” to explicitly state one of the principal areas of focus;		
	1. “That every boat entering any of the Rotorua Lakes be required to certify that the skipper has checked, flushed, drained and cleaned his boat, engine, trailer and associated gear.”		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted. The new clause in Rule 7 requires that the vessel in its entirety is clear of pests.		

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## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	41: 1	Submission Type:	Seek Amendment
Submitter:	Richard Leary		
Submission Summary:	Support Submission #5.  I wish to record that as a financial member I support the Lake Water Quality Society Submission in respect of the Proposed Regional Pest Management Plan now in your hands  I ask you also to recognise that the high quality of this submission, coming as it does from a sixty year old voluntary society known for its effectiveness coupled with good will to all parties, reflects a commitment which I assume you both endorse and share  And it follows that I ask should you disagree with any part or parts of the Submission, that you offer workable alternatives so to ensure its purpose		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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Submission Number:	42: 1	Submission Type:	Seek Amendment
Submitter:	Lake Rotoiti Community Association		
Submission Summary:	Support Submission #5.  Our Association agrees that the only way to protect our lakes is by having all boats entering the lakes to be engaged in this protection. To date the prevention of the spread of pest weeds and fish has failed and we believe that the approach to these problems must change if we are to be successful in retaining the iconic nature of our lakes.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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Submission Number:	43: 1	Submission Type:	Seek Amendment
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## Regional Pest Management Plan Council Decisions by Section

Submitter:	Terry Beckett		
Submission Summary:	Support Submission #5.		
	<p>As a biologist I understand the complexity of the aquatic species issues and commend the LWQS for their concern, but the reality is that in most cases the “horse has bolted” and any in-lake control, except spraying pest weeds to control problem areas, is extremely unlikely to eradicate aquatic pest weeds. We therefore need to concentrate on preventing lake to lake transfers via boats or equipment.</p> <p>However, I do not believe the LWQS submission will result in eradicating or containing pest aquatic organisms by advocating a voluntary cleaning As a biologist I understand the complexity of the aquatic species issues and commend the LWQS for their concern, but the reality is that in most cases the “horse has bolted” and any in-lake control, except spraying pest weeds to control problem areas, is extremely unlikely to eradicate aquatic pest weeds. We therefore need to concentrate on preventing lake to lake transfers via boats or equipment.</p> <p>However, I do not believe the LWQS submission will result in eradicating or containing pest aquatic organisms by advocating a voluntary cleaning regime. The only way to prevent future incursions of aquatic pests is to ensure that any boat entering a lake from another lake is professionally steam cleaned, which is an unrealistic requirement. The likelihood of catfish reaching new water bodies could be reduced by banning any boat or equipment used in Lakes Rotoiti or Rotorua from being used in another lake within a set time, such as one month.</p> <p>There are a number of things that can and should be done immediately:</p> <p>The tourist “ducks” that move between Lakes Tikitapu, Okareka and Tarawera should immediately be restricted to one water body only.</p> <p>There needs to be a major PR campaign across different media to alert the public to the issue and what can be done about it.</p> <ul style="list-style-type: none"> <li>• Personnel need to be present at all boat ramps very frequently to reinforce the risk of spreading aquatic pest species.</li> </ul>		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	<p>Support for submission #5 noted</p> <p>The tourist “ducks” will need to meet Rule 7 requirements. Council has increased resourcing (including communications and staff presence at the ramps.</p>		
Submission Number:	44: 1	Submission Type:	Seek Amendment
Submitter:	Jim Koller		
Submission Summary:	Support Submission #5.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		
Submission Number:	45: 1	Submission Type:	Seek Amendment
Submitter:	John & Sue La Roche		
Submission Summary:	Support Submission #5.		
	<p>As a bach owner and frequent user of Lake Rotoiti we fully support the Lake Water Quality Society submission, in particular the eradication of Koi Carp and Perch. The infestation of Cat Fish in our wonderful lake is a disaster that will require continuing effort to achieve containment and hopefully eventual elimination. Similar situations with other pest plants and fish must not be allowed to occur and every effort must be made to ensure that pests are not permitted to get the stage where they are beyond control or eradication.</p>		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	46: 1	Submission Type:	Seek Amendment
Submitter:	Richard & Pauline Kean		
Submission Summary:	Support Submission #5.  Please assure the Rotorua lakes are better protected by introducing rules for all boats/craft entering any Rotorua region lakes. It is obvious we need to be sure all craft are free of contamination. We support the efforts of LWQS submission to achieve this.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for submission #5 noted		

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Submission Number:	47: 1	Submission Type:	Seek Amendment
Submitter:	Richard & Christine Amery		
Submission Summary:	Support Submission #5.  We support the direction of the submission but are not sure about the ability to police compliance, or the extra work we would be putting boat owners to - we feel that it would be more effective to simply man boat ramps at busy periods and at random times to encourage and police compliance in checking trailers and boats.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Accept		
Reasons:	Support for submission #5 noted. BOPRC has increased compliance at boat ramps and will continue to do so with extra funding		



## Regional Pest Management Plan Council Decisions by Section

Submission Number:	51: 4	Submission Type:	Not Applicable
Submitter:	Royal Forest & Bird		
Submission Summary:	Under the Biosecurity Act a pest is defined as being “an organism specified as a pest in a pest management strategy. If dozens of species disappear from the plan, they are no longer legally pests, and reference to the pest management plan in other jurisdictions e.g. territorial authority plans, lose their mandate. For example many subdivision consents have either conditions or consent notices referring to species in the Regional Pest Management Plan. It is not efficient or feasible to revisit all subdivision and land use consents to review such conditions and laboriously list all of the species that have been dropped, but are still pests in practice.		
Decision Sought:	Consider wider range of species to be included in RPMP		
Council Decision:	Reject		
Reasons:	<p>Pests suggested for inclusion during the consultation process have been considered and Cost Benefit Analyses (CBA) undertaken for a number of pests not included in this proposal.</p> <p>The RPMP needed to be reviewed and must now meet National Policy Direction requirements. Other planning provisions, conditions and consent notices that link to the pests listed in the RPMP do not determine BOPRC decision making under the Biosecurity Act 1993. However wording has been amended in section 4 and the following has been included:  “Council will continue to provide management advice relating to Advisory pests as part of its pest management strategic direction. The rules in regional plans and provisions in land management agreements that refer to pests specified or listed in the RPMP apply to Advisory pests included in Appendix 1 as well as other pests directly managed under this RPMP.”</p> <p>The following text now introduces Advisory pests in Appendix 1:  “The following table includes other organisms that adversely affect production, environmental and/or public values and are considered part of the region’s biosecurity framework but these pests are not the subject to identified programmes or rules in this RPMP. For that reason they have been termed Advisory pests. These Advisory pests are still intended to be managed as part of the region’s wider biosecurity framework. The rules in regional plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.”</p>		
Submission Number:	51: 8	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	It would be useful to have the National Pest Plant Accord List as a reference in the Appendix which fills in the gaps in the regional plan and also allows for the public to assist in enforcement.		
Decision Sought:	It would be useful to have the National Pest Plant Accord List as a reference in the Appendix which fills in the gaps in the regional plan and also allows for the public to assist in enforcement.		
Council Decision:	Reject		
Reasons:	The National Pest Plant Accord (NPPA) is maintained by the Ministry of Primary Industries (MPI) and this list is reviewed from time to time. Therefore the list of species changes over time. Including it in our RPMP would quickly become out of date. The MPI website is the best way to stay informed on what species are in the NPPA.		
Submission Number:	51: 9	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	We understand that the operational plans only have to be done within 3 months of the plan being made operative. However the lack of detail as to how the plan will be implemented is frustrating, particularly for pests such as wallabies, and the freshwater pest fish.		
Decision Sought:	We understand that the operational plans only have to be done within 3 months of the plan being made operative. However the lack of detail as to how the plan will be implemented is frustrating, particularly for pests such as wallabies, and the freshwater pest fish.		
Council Decision:	Comment noted		

## Regional Pest Management Plan Council Decisions by Section

Reasons:	The management regime provided for each programme shows Council's intended service delivery		
Submission Number:	53: 1	Submission Type:	Seek Amendment
Submitter:	Alison Hutchins		
Submission Summary:	Support Submission #5.  I have owned a holiday property at Lake Okareka since 1991 and believe it vital that a plan as proposed should be in place.		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Comment noted		
Reasons:	Support for Submission #5 is noted		
Submission Number:	54: 10	Submission Type:	Oppose in Part
Submitter:	Department of Conservation		
Submission Summary:	<p>The Department is concerned that the symbolism of listing these pests as non-RPMP pests may reduce the perceived risk of these pests in the eyes of the public. This concern has recently been raised by a community stakeholder.</p> <p>It is our understanding that the reclassification of the 'Restricted Pests' under the current plan, largely to 'non-RPMP Pests' under the proposed plan, will not change Council investment in managing these species. Council investment will continue to predominantly be provision of advice and education on these pests. Confirmation of this when we next meet would be appreciated.</p> <p>The Department is concerned that by removing restricted pests and listing them as non-RPMP species that it will reduce the Council's capability to enforce regulations pertaining to these pests in resource consents.</p>		
Decision Sought:			
Council Decision:	Accept		
Reasons:	<p>Non RPMP pests have been renamed Advisory pests to help convey message that they are still recognised pests that Council will provide advice on their management.</p> <p>However wording has been amended in section 4 and the following has been included:</p> <p>Council will continue to provide management advice relating to Advisory pests as part of its pest management strategic direction. The rules in regional plans and provisions in land management agreements that refer to pests specified or listed in the RPMP apply to Advisory pests included in Appendix 1 as well as other pests directly managed under this RPMP.</p> <p>Following text now introduces Advisory pests in Appendix 1:</p> <p>The following table includes other organisms that adversely affect production, environmental and/or public values but that are considered part of the region's biosecurity framework but these pests are not the subject to identified programmes or rules in this RPMP. For that reason they have been termed Advisory pests. These Advisory pests are they are still intended to be managed as part of the region's wider biosecurity framework. The rules in regional plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	54: 14	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	Apple of Sodom – support progressive containment category.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 19	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	Italian Buckthorn – support progressive containment category and exclusion category as per map 7.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	54: 31	Submission Type:	Not Applicable
Submitter:	Department of Conservation		
Submission Summary:	Blue morning glory – recommend sustained control category north of the boundary line recommended for wild ginger and eradication south - as per banana passionfruit as this species has similar distribution as banana passionfruit. Blue morning glory is known to climb over all other plants ultimately killing them and can then replace forest with a low weedy blanket.		
Decision Sought:	Recommend sustained control category north of the boundary line recommended for wild ginger and eradication south - as per banana passionfruit as this species has similar distribution as banana passionfruit.		
Council Decision:	Reject		
Reasons:	No change recommended.  Cost benefit analysis has determined that inclusion of Blue Morning Glory in the RPMP management programmes is not cost-beneficial. Blue Morning Glory is included as an advisory pest in the RPMP. It is recommended that Blue Morning Glory be managed under our site-led approach to manage high value sites such as Environmental Programmes and Coast Care.		
Submission Number:	55: 1	Submission Type:	Seek Amendment
Submitter:	Lake Okareka Community Association		
Submission Summary:	Support Submission #5.  LOCA support the changes and additions proposed by LWQS as follows: <ul style="list-style-type: none"> <li>• Including LINZ as one of the Crown Agencies</li> <li>• The change in status of some of the pests.</li> <li>• Providing an additional Provision in Rule 7 requiring "That every boat entering any of the Rotorua Lakes be required to certify that the skipper has checked, flushed, drained and cleaned his boat, trailer and associated gear"</li> </ul>		
Decision Sought:	Include additional rule as proposed by submitter #5.		
Council Decision:	Accept in Part		
Reasons:	Reference to LINZ has been amended.  Pest fish have been added to the exclusion programme where these species are not already present.  Rule 7 has been amended to include a self-certification clause in 6.4, p73.		

### Section: 1.2 Purpose

Submission Number:	51: 11	Submission Type:	Oppose
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## Regional Pest Management Plan

### Council Decisions by Section

Submitter:	Royal Forest & Bird
Submission Summary:	<p>The purpose of pest management plans is set out in Part 5 of the Biosecurity Act:</p> <p>54 The purpose of this Part is to provide for the eradication or effective management of harmful organisms that are present in New Zealand by providing for—</p> <p>(a) the development of effective and efficient instruments and measures that prevent, reduce, or eliminate the adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori, their culture, and their traditions and their ancestral lands, waters, sites, wahi tapu, and taonga; and</p> <p>(b) the appropriate distribution of costs associated with the instruments and measures.</p> <p>Paragraphs 3 and 4 are a subjective rendition of the requirements for a Cost Benefit Analysis which is alluded to in the last paragraph on p4.</p> <p>The purpose should be forward thinking and determine future pests impacts. The current purpose only considers “lack of individual action or inaction and undue effects on others” giving a purely human aspect.</p>
Decision Sought:	<p>Delete 1.2 Rewrite as follows:</p> <p>The purpose of the Proposed RPMP is to outline the framework to efficiently and effectively manage or eradicate specified organisms in the Bay of Plenty region to Doing so will:</p> <ul style="list-style-type: none"><li>• prevent, reduce, or eliminate the adverse effects of harmful organisms on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori, their culture, and their traditions and their ancestral lands, waters, sites, wahi tapu, and taonga; and</li><li>• fairly attribute the costs maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach</li></ul> <p>Or in the alternative:</p> <ul style="list-style-type: none"><li>• Prevent new pests entering and establishing in the Bay of Plenty and manage as a priority species recognised as significant pests elsewhere</li><li>• Manage established pests where it is practical and cost-effective to do so, using Council’s regulatory and/or operational roles.</li><li>• Support the voluntary efforts of landowners/occupiers and communities to manage established pests through regulatory and non-regulatory roles.</li></ul>
Council Decision:	Reject
Reasons:	The purpose aligns with the nationally agreed RPMP template.

#### Section: 3.4 Crown Agencies

Submission Number:	11: 13	Submission Type:	Oppose
Submitter:	Ian Noble		
Submission Summary:	Page 24 – 5 MOUs – if a lower or different standard is allowed, this will create a very bad look as will staff giving dispensation.		
Decision Sought:	Council should review the Trees and Power Lines Regulation for some first principals that have been a success and are fair to all parties.		
Council Decision:	Reject		
Reasons:	<p>Crown agencies, crown entities and SOEs are all charged with managing large swathes of land in our region. Due to the makeup of the land Crown agencies managing, implementing and enforcing good neighbour rules would be difficult, possibly impossible to enforce.</p> <p>The MOU (which will be available to the public) commits to a good neighbour intent and does not take away from the exercise of Council's regulatory powers. However Council considers there is more benefit working with key crown stakeholders to negotiate and implement an agreed programme of works for pests along boundaries.</p>		

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## Regional Pest Management Plan Council Decisions by Section

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<b>Section: Requests for new pests</b>
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Submission Number: 54: 28	Submission Type: Seek Amendment
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Submitter: Department of Conservation

Submission Summary: There is still very limited distribution in the Bay of Plenty and this species was classified as an eradication plant pest in previous Council plans. The distribution of this plant has not changed significantly since then and altering its status to non-RPMP is not recommended. Infestations of royal fern at Tumurau and Matakana Island are the two most significant infestations in the region with only very small localized infestations of occasional plants at other sites. This plant is still absent from most Bay of Plenty wetlands and represents a major threat to all wetlands and stream margins as it is fast growing and displaces native species in the understory of wetlands. It is currently still at a level where it can be controlled from the Bay of Plenty down to a zero-density level over time and the Department is controlling this species wherever it occurs on public conservation land. Any reduction in resources and control of this plant is not supported as this could lead to this species dominating and significantly altering the ecology of a large number of Bay of Plenty wetlands as it has done in the Waikato. The ecological significance and relative rarity of current wetlands in the Bay of Plenty is recognised by the Department and Council and a strong ongoing focus on managing significant emerging weed threats in wetlands such as royal fern is appropriate.

Decision Sought: Royal fern- recommend progressive containment category.

Council Decision: Reject

Reasons: No change recommended.

Cost benefit analysis suggests it is cost-beneficial to include royal fern in the RPMP, however management is logistically challenging due to wind spread spores. It is recommended that royal fern be managed under site-led environmental programmes and retained as an advisory pest.

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## Regional Pest Management Plan

### Council Decisions by Section

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<b>Section:</b> <b>Rule 7</b>
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Submission Number:	48: 5	Submission Type:	Support in Part
Submitter:	Rotorua Lakes Community Board		
Submission Summary:	We fully support the provisions of Rule 7. We note that other submitters have called for an additional rule regarding self-certification of boats entering any of the Rotorua lakes. We feel that this proposal is most likely covered by Rule 7, provision 3 and is better suited as an example of how Provision 3 could be implemented that a provision in its own right. We do however recognise and support those submitters feelings that the three provisions as stated don't reflect the seriousness of possible spread of pest fish and plants between the Rotorua Lakes.		
Decision Sought:	We suggest an addition to the following note associated with Rule 7... 'This is to protect production, environmental and public values that can be adversely affected by aquatic pests'. We suggest the addition "Regional Council will work proactively to ensure compliance with the above provisions of Rule 7".		
Council Decision:	Accept		
Reasons:	Additional sentence added to Rule 7 explanation		

## Regional Pest Management Plan

### Council Decisions by Section

#### Section: Strategic Direction

Submission Number: 31: 3 Submission Type: Oppose

Submitter: Western Bay of Plenty District Council

Submission Summary: This comment is only substantiated within the RPMP at s.2.2.1, Part 5 (p.10) where it is stated: "A harmful organism is assigned pest status if included in a pest management plan (also see the prerequisites in s69- 78 of the Biosecurity Act)".

While many non-native plants within natural environments are not pests, it is not correct to specify that "a large number of well- established pests cannot be technically defined as pests under the Biosecurity Act as they do not meet the legislative thresholds." The Biosecurity Act (s.5) specifies that an organism is a pest if it has adverse harmful effects on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori and their (values).

Examination of s.69-78 of the Biosecurity Act does not exclude any of the pests which have until now been included in the Operative RPMP, nor does it exclude those non-RPMP pests which are listed at Appendix 1 of the RPMP, nor those serious Bay of Plenty pests that don't appear in either of those lists.

It's neither statutorily correct, nor appropriate as guardians, to essentially ignore some serious pests (particularly plant pests) which threaten to dominate and transform the natural environment of the Bay of Plenty, thereby losing our regional character. Just a handful of unmanaged pest plants, including: Taiwan cherry, wilding pines, mignonette vine, climbing asparagus fern, wild jasmine, moth plant, wattle, pampas and woolly nightshade, have the potential to completely transform our native forests and riparian margins and wetlands from floor to canopy within a matter of only a few decades.

The following Strategic Direction statement - "However, this does not mean Council steps away from managing these pests. The strategic direction section of the Proposed RPMP identifies how Council will address the issue of 'non-regulatory' pests.

Examples of those pests are included in Appendix 1"-does not give any assurance that a dramatic demise of our natural environmental character and values will be averted through the RPMP.

We submit that this paragraph be reconsidered and rewritten.

Decision Sought: Remove the comment: "A large number of well-established pests cannot be technically defined as pests under the Biosecurity Act as they do not meet the legislative thresholds."

Reconsider and rewrite this section.

Council Decision: Accept in Part

Reasons: A regional council is not legally obliged to manage a pest or other organism unless it chooses to do so.

For a specific pest to be included in the RPMP, Council must be satisfied the proposal has merit as a means of eradicating or effectively managing the pests. Council must be satisfied it has the resources to manage the pest and the pest management objective can be met.

However amend the strategic direction on page 1 of the RPMP as follows:

A large number of well-established pests cannot be technically included as pests under the Biosecurity Act as they do not meet the legislative thresholds (for example the pest management objectives are unlikely to be met or the costs to manage the pest outweigh the benefits).

#### Section: Table 6 Pest Descriptions

Submission Number: 52: 12 Submission Type: Support in Part

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Ministry for Primary Industries
Submission Summary:	<p>There is the potential to provide for regulatory support through the use of RPMP rules to address situations where wilding conifer spread from planted conifers is generating unreasonable impacts on neighbouring land, or threatening key areas of value.</p> <p>One of the statutory consequences of specifying an organism as a pest is that it triggers ss 52 and 53 of the BSA, which prohibit the propagation, sale, breeding, communication, release etc of the species. Where a species that causes wilding conifer spread also has significant value as a planted and commercially managed resource, as is the case for a number of the conifer species, this creates an untenable outcome.</p> <p>However, some of the species that cause wilding conifers have very limited commercial value, but can be highly invasive, and therefore it may be appropriate to specify these species as pests in their planted state, in addition to being pests under the wilding conifer definition in their naturally regenerated state. This would effectively prevent new plantings of these species, as well as enable regulatory control requiring removal of these species in situations where they are planted but pose a wilding conifer spread risk.</p> <p>Contorta in particular, is the most invasive introduced conifer species and represents a significant proportion of all wilding conifers and original sources of wilding conifer spread. Contorta is already an unwanted organism under the BSA, and has been included in the Proposed Plan.</p> <p>However, other low value but highly invasive conifer species that could also potentially be specified as pests are Scots pine, Dwarf mountain pine, Mountain pine, and European larch. In the case of European Larch, the intent here is to address early plantings that cause ongoing wilding spread, rather than the sterile hybrids that tend to be used in more recent plantings.</p> <p>A key factor in recommending that these species be separately specified as pests (alongside Contorta) is to enable control of them in their planted state where they are causing wilding conifer spread and/or threaten particular values through the spread of wilding conifers, as a means of supporting and contributing to wilding conifer outcomes</p>
Decision Sought:	<p>Conifer species recommended for inclusion in RPMPs as pests:</p> <ul style="list-style-type: none"> <li>- Lodgepole or contorta pine (<i>Pinus contorta</i>)</li> <li>- Scots pine (<i>Pinus sylvestris</i>)</li> <li>- Dwarf mountain pine and mountain pine (<i>Pinus mugo</i> and <i>Pinus uncinata</i>)</li> <li>- European larch (<i>Larix decidua</i>)*</li> </ul> <p>*Excludes sterile hybrids</p>
Council Decision:	Accept in Part
Reasons:	<p>Scots pine (entire region), Dwarf mountain pine (entire region), Mountain pine (entire region), European larch* (entire region) to be added to the progressive containment programme. These additional four species have little commercial value making the ongoing seed source from production forestry manageable. Therefore progressive containment for these species is achievable. Rule 3 requires occupiers to destroy these pests unless they are party to a Progressive Containment Pest Management Agreement.</p>

### Section: Plan in General

Submission Number:	10: 2	Submission Type:	Oppose
Submitter:	Jean-Paul Thull		
Submission Summary:	I struggle as a non-specialist to differentiate between sustained control and progressive containment. In many ways you seem also to apply the Cost-benefit approach that was popular over the last 2 decades but seems to lose track as it can put you way behind mitigation if not careful.		
Decision Sought:	As it stands, the proposal is not acceptable as it is valid for 10 years, which is huge in terms of vegetation growth. Let's focus on goals to ERADICATE pest plants instead of looking at sustained control or progressive containment as in reality it has no teeth.		
Council Decision:	Reject		
Reasons:	The National Policy Direction provides clear criteria for pests to be included in the eradication programme, for example if the pest cannot be realistically eradicated over the duration of the Plan it cannot be included as an eradication pest. This RPMP requires progressive containment pests to be destroyed. The sustained control boundary rule manages effects on adjoining neighbours.		



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## Regional Pest Management Plan

### Council Decisions by Section

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Submission Number: 11: 1 Submission Type: Neutral

Submitter: Ian Noble

Submission Summary: Page 1 "in some cases a different approach to pest management is required". As one who has sat on Pest Management hearings in the past, I inform you that what is in the Plan is very important and how it is enforced gives meaning to the Plan. The future is likely to be more challenging with warmer temperatures, bigger storm events, etc.

Page 8 – Operational plans and procedures. An Operational Plan is required by the Biosecurity Act and sets out how the RPMP will be executed. This Plan must set out the rules of operation of who does what e.g. Council staff inspection, property owner action, what time to start and ongoing maintenance with further inspection and Council action to do the work and charge if the work is not done.

The good standing and respect for Council depends on how this Plan gives effect to the Pest Management Plan.

Page 15 3.1c – has the capacity, competency or expertise to implement the proposed RPMP.

The record of Council, in my opinion, is not good and there needs to be a shift in attitude to give effect to the intention of the Plan.

Decision Sought: Much in this Plan needs reassessment, the way it is enforced is critical if Council is to regain its credibility.

Increased involvement with the community is desirable and possibly 3 committees, which the river schemes have, and/or caring rate payers in each of the zones of Western Bay, Rotorua and Eastern Bay. Harbour care could be improved with reduction of Geese and Swan that over graze the sea grass also.

Council Decision: Comment noted

Reasons: The way the Plan is implemented and enforced will be set out in the Operational Plan which must be developed within three months of this Plan being made. This will be available to the public.

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Submission Number: 12: 1 Submission Type: Support

Submitter: Whakatohea Mussels

Submission Summary: Support intent of the Proposed RPMP, in particular the introduction of provisions to manage marine pests.

Decision Sought:

Council Decision: Comment noted

Reasons: Support noted.

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Submission Number: 14: 1 Submission Type: Oppose

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Andy Blick
Submission Summary:	<p>No plant or animal should be categorized as a pest.</p> <p>Classifying an animal, or plant, as a pest just allows it to be singled out for enhanced levels of vilification and cruel mistreatment. Nothing more. (We have a peculiar pechant for violence towards fellow sentient beings.).</p> <p>This plan includes in its pages most of New Zealand's most common wild animals. Is a countryside devoid of all wild mammalian life really what we want? For me personally the answer is an emphatic NO.</p> <p>As an example: wallabies, long targeted for complete eradication. I see in this plan that is no longer stated but the wishful intent will still be within the organisation. Why do people want wallabies gone? I currently live in wallaby territory. As a trained wildlife observer I have studied them as much as I can, given they are quite a cryptic animal. Elusive. Amazing.</p> <p>If you get to see one alive, not squashed on the road, you are doing well.</p> <p>I can find little "detrimental impact" (a relative term) from wallabies in this already heavily modified landscape. They appear to shelter during the day in small pockets of forest (native and pine) and feed out onto farmland at night.</p> <p>Numbers are not huge. (No farmer i know of complains about the amount of grass wallabies eat.) Even spotlighting paddocks at night does not show up many animals. Big areas seem to hold none and this is supposedly wallaby heartland.</p> <p>From my observations and impressions I fail to understand why they are vilified and victimized so vehemently?</p> <p>I like having them around. I like that they are a challenge to observe. They are a unique feature of the Bay of Plenty.</p> <p>In a recent conversation with a senior EBOP "pest Manger " he mentioned that not much is known about them.</p> <p>That statement astounded me. Years of attempts at hunting to extinction and little is known about their behaviours and biology?</p> <p>I can only imagine this is the same for many, if not all, the animals on the "pest" list. In fact I know this is the case.</p> <p>In setting out to kill and destroy we are not only ignorant of we are doing but also know little about what we are doing it too.</p> <p>It's actually a sign of the growing disconnect between humans and nature. I look forward to the day when such plans as these are discarded in favour of a more understanding, appreciative and compassionate approach to living in this amazing country.</p> <p>In the 10 years this proposed plan encompasses I am optimistic these changes will happen. It will lose its relevancy.</p>
Decision Sought:	My recommendation would be: to scrap this plan in its entirety. If the Regional Council was to do this what would happen? Life would simply go on. Wouldn't it?
Council Decision:	Reject
Reasons:	This submission point is not considered feasible. Council must show leadership in regional pest management and an RPMP is considered the best way by Councils across New Zealand to show such leadership.

Submission Number:	16: 1	Submission Type:	Support
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Submitter:	Tauranga Bridge Marina
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Submission Summary:	<p>Support in its entirety</p> <p>We have been working with those involved to eradicate marine biosecurity risks in the BOP waters.</p>
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Decision Sought:	
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Council Decision:	Comment noted
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Reasons:	Support noted.
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Submission Number:	19: 1	Submission Type:	Support
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Submitter:	Waikato Regional Council
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Submission Summary:	<p>Waikato Regional Council (the council) appreciates the opportunity to make a submission on the Bay of Plenty Regional Council's (BOPRC) Proposed Regional Pest Management Plan (proposed RPMP).</p> <p>Overall, the council strongly supports the approach and intent of the proposed RPMP.</p>
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## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	Our two councils have a special relationship through the sharing of a common boundary. Biosecurity issues between the two regions overlap at times in relation to climatic, land management and land tenure matters. We also have an excellent history of working collaboratively together, on national and interregional projects (such as marine pathways planning and dama wallaby management), and we recognise the importance of engagement with others to address and solve biosecurity issues. Many of our stakeholders are the same people and organisations and it is important that collectively we demonstrate clear leadership in the biosecurity space.		
Council Decision:	Comment noted		
Reasons:	Support noted. Other submission points addressed individually.		
Submission Number:	27: 8	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Supporting document pg 36 Although this section recognises the kiwifruit industry as contributing toward the costs of wild kiwifruit control, it does not include any amount. Similarly, it does not include any amount contributed from landowners. These contributions should be included in the Description Cost table and allowed for in the cost-benefit calculation.		
Decision Sought:	Please include the contribution amounts from the kiwifruit industry (\$200,000 annually) and landowners (\$70,000 annually) as part of the collaborative control programme. Taking these into account, please recalculate the cost- benefit analysis (CBA) for wild kiwifruit.		
Council Decision:	Accept		
Reasons:	Staff have worked with KVH with regards to funding contributions and this has been reflected in the cost benefit analysis document.		
Submission Number:	27: 9	Submission Type:	Support
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Supporting Document p37 KVH has previously initiated Memorandum of Understanding agreements with Council and supports another MOU to provide long-term certainty of funding for wild kiwifruit management.		
Decision Sought:	Agree an MOU between KVH and BOPRC		
Council Decision:	Accept		
Reasons:	KVH and BOPRC staff have progressed this issue.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	27: 11	Submission Type:	Not Applicable
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	<p>Supporting document. Contract Report 4299: Section 2.8.2 Page 14; and CBA calculations pp 150-161</p> <p>The contributions of industry and landowners should be included in the calculations (pages 150-161) so that there is a fair CBA result. A more positive CBA result will support the KVH/NZKGI request that wild kiwifruit be a Progressive Containment pest that landowners are required to control throughout the BOP region.</p>		
Decision Sought:	<p>Supporting document. Contract Report 4299: Section 2.8.2 Page 14; and CBA calculations pp 150-161</p> <p>Please recognise KVH (representing the kiwifruit industry) as an agency that contributes to the cost of wild kiwifruit control in the BOP. Recalculate the CBA including the contribution of the kiwifruit industry (as an agency) currently contributing \$200,000 per year. Also include the contribution of landowners in the Landowner compliance costs (\$70,000 contribution to the collaborative programme and at approximately \$100,000 cost/value of control undertaken by landowners themselves).</p>		
Council Decision:	Accept		
Reasons:	Staff have worked with KVH with regards to funding contributions and this has been reflected in the cost benefit analysis document.		
Submission Number:	27: 12	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	<p>Supporting document Contract Report 4299: Section 3.4.6 Page 150</p> <p>The Qualitative Impact Assessment should have assessed wild kiwifruit as a medium or high potential impact to commercial kiwifruit cropping. The kiwifruit industry is concerned that any pest to kiwifruit that establishes in the wild population could move into and have an adverse effect on nearby kiwifruit orchards.</p>		
Decision Sought:	Please amend the table and calculation recognising that wild kiwifruit has a medium to high potential impact on commercial kiwifruit cropping.		
Council Decision:	Accept		
Reasons:	Accompanying document will be changed to reflect impact to Kiwifruit industry.		
Submission Number:	27: 13	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	<p>Supporting Document. Contract Report 4299: References Page 174</p> <p>It appears that the CBA has not taken into account all relevant information. The CBA model may not be appropriate for the wild kiwifruit programme which is collaboratively funded and managed. The Jon J. Sullivan report concluded that there was a positive cost-benefit to controlling wild kiwifruit in the Bay of Plenty.</p>		
Decision Sought:	Please consider the findings of the KVH/BOPRC funded report, "Assessing the cost effectiveness and future options for wild kiwifruit management in the Bay of Plenty" by Jon J. Sullivan (Contract Report, Department of Ecology, Lincoln University July 2014) in the CBA (including calculations) and include reference to it on page 174; or replace the CBA calculations with the findings in the above report.		
Council Decision:	Accept in Part		
Reasons:	Accompanying document will be changed to reflect supporting literature.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 9	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	Since the Long Term Plan preceded the RPMP I surmise that the Long Term Plan was not able to reflect actual costs of regional pest management when taking into account meaningful control of serious plant pests that don't appear in the body of the RPMP.		
Decision Sought:	I submit that management of biosecurity threats to the Bay of Plenty's natural character and values should have a greater priority than approx 3% of the total BOPRC budget. Any additional resource should focus on reducing pest threats rather than funding more administration. I don't suggest additional total BOPRC regional operating costs rather a redistribution of BOPRC total revenues would more appropriately prioritise pest management as a function of BOPRC's responsibilities and stated objectives.		
Council Decision:	Comment Noted		
Reasons:	Funding pest management through long term planning is a separate process to decision making on the RPMP. That said Council must be satisfied it has the funding available to implement the RPMP.		
Submission Number:	31: 2	Submission Type:	Seek Amendment
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>We have some concerns about the limited extent of consultation and active engagement around the proposed RPMP. The RPMP has a long life and is an important document for underpinning the wellbeing of our district and region. We would have expected a high degree of engagement to actively seek input.</p> <p>We urge BOPRC to assess the level of submissions received and consider if further more active engagement is required.</p>		
Decision Sought:	Ensure that consultation on the proposed RPMP has been thorough enough.		
Council Decision:	Reject		
Reasons:	Council is satisfied that it has met the consultation requirements of the Biosecurity Act (Regional Direction Delivery Committee, 11 December 2018). Since submissions closed all submitters were personally contacted and provided an opportunity to discuss their pest management concerns and submission points.		
Submission Number:	31: 4	Submission Type:	Support in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>Since the Long Term Plan preceded the RPMP we surmise that the Long Term Plan was not able to reflect actual costs of regional pest management. This is particularly the case when taking into account meaningful control of serious plant pests that don't appear in the body of the proposed RPMP. It's a fear that table 14 - allocation of costs, reflects the division of the LTP funding, rather than necessarily acknowledging the quantum required to meet BOPRC's responsibilities in this area.</p> <p>We acknowledge that Regional Council has many competing priorities, however Pest Management is a core function for regional councils.</p> <p>We submit that management of significant biosecurity threats to the Bay of Plenty's natural character and values should have a greater priority than the approximate four percent of the total BOPRC budget. Any additional resource should focus on reducing pest threats rather than funding more administration. We don't suggest additional total BOPRC regional operating costs, rather a redistribution of funds within BOPRC's total revenues would more appropriately prioritise pest management as a function of BOPRC's responsibilities and stated objectives. This may be considered through the development of Annual Plans.</p>		
Decision Sought:	We submit that management of significant biosecurity threats to the Bay of Plenty's natural character and values should have a greater priority than the approximate four percent of the total BOPRC budget. Any additional resource should focus on reducing pest threats rather than funding more administration. We don't suggest additional total BOPRC regional operating costs, rather a redistribution of funds within BOPRC's total revenues would more appropriately prioritise pest management as a function of BOPRC's responsibilities and stated objectives. This may be considered through the development of Annual Plans.		
Council Decision:	Accept in Part		
Reasons:	Funding pest management through long term and annual planning is a separate process to decision making on the RPMP. That said Council must be satisfied it has the funding available to implement the RPMP.		

## Regional Pest Management Plan Council Decisions by Section

While the current budget of \$2.3M would be adequate to move the region towards the pest management outcomes of the RPMP, it is inadequate to deliver a RPMP that incorporates amendments arising from the submission process.

Council supported an option that provides additional funding to support capability-building for Maori land owners, initial control work (on problematic Maori land), community initiatives and a stronger focus on improving compliance along property boundaries in Western Bay of Plenty. This direction on funding and resourcing levels will guide RPMP planning decisions and development of the next Long Term Plan.

Submission Number:	48: 1	Submission Type:	Support
Submitter:	Rotorua Lakes Community Board		
Submission Summary:	We support the RPMP in general. We would also like to acknowledge the hard work of Council staff involved in pest management control.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	51: 1	Submission Type:	Support
Submitter:	Royal Forest & Bird		
Submission Summary:	It is good to see an updated pest plan being developed by Bay of Plenty Regional Council (BOP) for pest management in the region as the current plan is out of date. We hope this proposed Plan allows for more funds to be directed towards important pest management outcomes in the region.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted. Extra pest management funding has been committed during the development of the RPMP.		
Submission Number:	51: 2	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>We are concerned that a number of species which are in the current operative plan have been removed from the proposed RPMP. In effect this is reducing the scope of pest management in the region.</p> <p>It appears that this is a deliberate "strategic" decision by Council to take a non-regulatory approach by dropping the current "Restricted" pests under the guise of them not being technically defined as pests under the Act, and not meeting legislative thresholds (p1). Forest &amp; Bird does not accept that this approach is valid. For many of the pests included it is said regulatory control is necessary because of the costs to others if landowners don't control pests on their land. This argument is equally valid to the excluded pests.</p> <p>While some of these pests are listed in Appendix 1, that section of the plan appears to be of uncertain legal status:</p> <p>There are many further organisms capable of causing some adverse effects that are not included in the Proposed RPMP. Reasons for this may be those pests are managed by another agency or they are now so widely established regional intervention (e.g. requiring pest removal) would not be practicable or affordable.</p> <p>While the Biosecurity Act has requirements for pests that are included in an RPMP, there are many other organisms that Council and the community consider as pests (see Appendix 1). These pests are not included in the pest programmes nor do they have "pest" rules.</p> <p>However, Council considers these 'pests' are to still be part of the biosecurity framework and Council will continue to provide management advice as part of its pest management strategic direction. P21 [our emphasis]</p> <p>We consider attention to the damage these species can cause should be addressed in the plan itself.</p>		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	We consider attention to the damage these species can cause should be addressed in the plan itself.		
Council Decision:	Accept in Part		
Reasons:	<p>Restricted pests in the current RPMP are not actively managed by Council. Appendix 1 lists pests that are not subject to provisions in the Plan but are still considered part of the biosecurity framework.</p> <p>Appendix 1 to be changed from Non-RPMP Pests to Advisory pests. This change will better acknowledge these pests (and their impacts) are part of the wider regional pest management framework. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	51: 3	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>We are surprised that the plan does not include any "Site-led Pest Programme" under National Policy Direction 5(e) "... in which the intermediate outcome for the programme is that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place". Many of the "non-RPMS" species could be appropriately included in this category, under which the enormous activity of volunteers logically falls. Bay of Plenty Regional Council has opted to use non-regulatory approaches to protecting specific values in specific places and so these do not feature in this Plan (p23) [our emphasis].</p>		
Decision Sought:	<p>Many of the "non-RPMS" species could be appropriately included in this category, under which the enormous activity of volunteers logically falls.</p> <p>Consider pests for inclusion in site led programme.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>BOPRC undertakes pest management to protect the significant values of individual sites as part of Council's biodiversity programme, which is funded and managed outside of the RPMP. This is discussed in the strategic direction section of the RPMP (pg. 1) and in section 5.2 – Pest Management Programmes.</p> <p>The following amendments are recommended to the section titled Council's Pest Management Strategic Direction/ Te Aronga Rautaki Patu Kirearea a Toi Moana (pg. 1).</p> <p>A number of Council core activities contribute directly to pest management and in some cases a different approach to pest management is required. For example, to protect high value sites such as biodiversity areas a site led approach is often required. Rather than focusing on individual pest species, all pests within a high value site need to be managed. In some cases this may include pests other than those regulated by the Proposed RPMP. For these reasons, the Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme.</p> <p>The following changes to Section 5.2 (pg 23) are recommended.</p> <p>The NPD also identifies "Protecting Values in Places" as an intermediate outcome. Bay of Plenty Regional Council has opted to use non-regulatory approaches to protecting specific values in specific places and so these site-led rules do not feature in this Plan. The non-regulatory site-led approach specifically for protecting biodiversity is supported through the strategic direction (see Pages 1-2).</p>		
Submission Number:	51: 7	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>We are concerned that the pest plan focuses on industry pest impacts and places less emphasis on impacts to nature and ecosystems with many critical pests being completely missing from the plan.</p> <p>Forest &amp; Bird believes a strong stance is required on invasive herbivores, particularly deer and omnivorous feral pigs. These species, in conjunction with possums, are a serious barrier to indigenous forest regeneration in the BOP region. We are very concerned about the damage being done by deer and pigs in local reserves and forests, particularly when they are undermining the hard work of restoration projects in the region. Yet they are absent from these plans.</p> <p>Other serious risks like myrtle rust or Kauri dieback are also not included. Given that Kauri dieback is not currently in the Kaimais, as far as we know, priority action must be taken. This will involve improving the</p>		

## Regional Pest Management Plan Council Decisions by Section

health of this forest and stop this pathogen spreading. This effort requires regional council cooperation.

It is also critical that the plan is forward thinking. What species are now a greater risk than they were when the last plan was made? For example, species like phoenix palms should be targeted as a pest to ensure action which will stop them becoming a long term threat to biodiversity. There is already evidence that they are being spread by birds into the bush reserves in Whakatane. Other palm species are now apparent threats in the Auckland region.

New research has shown that German wasps and Paper wasps are having an enormous impact on our native and declining insects. The council should consider the inclusion of these species in the plan.

Introduced plant and animal pests have invaded a significant proportion of New Zealand's freshwater ecosystems, and are increasingly being found in the marine environment. Both pose a substantial environmental and economic risk to the region. Many of these pest species have a substantial impact on ecosystems and native species, as well as on recreation and tourism opportunities/benefits. It would be beneficial if the RPMP had a separate section on aquatic and marine pests.

Decision Sought: Give greater consideration to pests impacting upon environmental values

Consider a separate section on aquatic and marine pests

Greater effort to address emerging pests eg, Phoenix Palm, wasps etc

Council Decision: Accept in Part

Reasons: Impacts to environmental values are a consideration through the Cost Benefit Analysis process. Also in each pest description in the RPMP the values being impacted on by the pest are listed and many of these are environmental.

BOPRC is not the lead agency to manage deer and pigs, although their management can form part of Council's site led approach.

When the RPMP was being developed, a National Pest Management Plan was being developed to manage kauri dieback. Despite this, at this stage no government funding has been committed for implementing this plan. Council has a role to play in supporting lead agencies to manage national pests. This is supported by our strategic direction and kauri dieback is included in the RPMP as an advisory pest. Kauri dieback has been declared by government an 'unwanted organism' and is subject to the relevant provisions under the Biosecurity Act. The majority of natural kauri in the Bay of Plenty is on Department of Conservation estate. Council staff currently do random soil testing for kauri dieback and engage with landowners who have kauri stands on their private property, encouraging them to fence off the Kauri from known vectors of spread. The landscape for managing and funding kauri dieback is changing. Some North Island regional councils are now seeking support for a regionally led programme for kauri dieback which BOPRC will be part of.

Aquatic and marine pests are included in the Proposed RPMP.

Wasps and phoenix palm are included as Advisory pests. It is recommended that these pests be managed under our site-led approach to protect high value sites including programmes such as Environmental Programmes and Coast Care.

Council's surveillance programme keeps an eye on changing pest situations including emerging pests. For example section 7.2(e) captures all pests:

(e) maintain up-to-date databases of complaints, pest levels and densities, and responses from Regional Council and land owners and/or occupiers as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups.

Submission Number:	51: 32	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Funding - The allocation for Progressive Containment of only 30% to service delivery seems too low when goats, wallabies and lodgepole pine are species where the council significantly funds some existing programmes, without consideration of the other aquatic and marine pests in this category. Similarly for Sustained Control – 70% inspection/5% service delivery? This does not seem realistic.		
Decision Sought:	Review funding allocations		
Council Decision:	Accept		
Reasons:	Council considered funding implications at its workshop on 13 November 2019.		



## Regional Pest Management Plan Council Decisions by Section

While the current budget of \$2.3M would be adequate to move the region towards the pest management outcomes of the PRPMP, it is inadequate to deliver a RPMP that incorporates amendments arising from the submission process. Council supported an approach that included a strong focus on issues of importance to our communities, in particular, aquatic pests, wallabies and woolly nightshade. It is important to note that while this option includes a substantial funding for managing woolly nightshade, in the sustained control programme, it will only focus on suppression along property boundaries and support for capability-building to assist with control on un-administered Maori land and not for wide-scale suppression.

This option would need a further funding allocation of \$1,350,000 per annum plus additional staff funding from 2021 onwards to support the demands of increased compliance work, on top of the additional operational funding. This brings the total operational budget from \$2.3M to \$3.67M.

Submission Number:	54: 1	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	<p>The dialogue to date between our agencies has been beneficial in that it has allowed knowledge sharing and understanding of each other's perspectives. It has been useful for Department staff to develop a greater understanding of your legislative context, organisational systems, staffing structures and operational priorities. This knowledge enables us to collaborate more effectively and to work towards finding efficiencies and synergies. We think there is benefit in continuing in this vein to further develop and explore ways for our organisations to complement and support each other.</p> <p>In May 2017, Allan Munn, the previous Operations Director of the Central North Island Region, provided comments on the RPMP Discussion Document which included a number of recommendations and suggestions. We would like to acknowledge that these comments have been considered and in some cases included in the draft RPMP. This submission looks to build on the May 2017 comments and may in some instances reset the focus on specific issues.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	56: 1	Submission Type:	Support
Submitter:	Te Mana o Ngati Rangitahi		
Submission Summary:	Supports the Proposal		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	51: 5	Submission Type:	Oppose in Part

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Royal Forest & Bird
Submission Summary:	<p>We have reviewed the cost benefit analysis (CBA) provided by council and consider it defective, as there is no analysis of any pests except ones the council had already decided to include.</p> <p>As voiced by Wildlands, Consultants, the CBA methodology is flawed for assessing non-monetary values, which comprise indigenous biodiversity, cultural and other values.</p> <p>In addition its application is inconsistent. The CBA of Didymo shows control would be of net benefit but it is not included. For other pests the CBA is beneficial but it is said the pest is too costly to control e.g. argentine ants, rabbits, feral cat. However the area of infestation is not equal to impact or effect of pest e.g. feral cat in coastal regions has potentially high impact on shorebirds. It would be appropriate to include feral cats in areas of high indigenous biodiversity that is habitat for ground dwelling or nesting species.</p> <p>Other species have negative cost benefits but these are over-ridden because the pest is potentially serious e.g. Darwin's barbery, water poppy, Italian buckthorn (allegedly because the model doesn't value coastal habitats), or woolly nightshade (the public want it controlled). Field horsetail is included despite a negative benefit because it is so hard to eradicate, but so is Rough horsetail, which is excluded.</p> <p>The model is clearly deficient as on p96 it is assumed "that the main economic value of sand dunes is recreation" – the buffer to coastal hazards is not mentioned.</p>
Decision Sought:	Consistency in way cost benefit results are applied.
Council Decision:	Reject
Reasons:	<p>Council has no obligation to undertake a cost benefit analysis for pests not included in the RPMP. Indeed this task could be infinite as the number of species could be endless and cost benefit analyses require resourcing. Council considered all pests raised through the discussion draft phase (i.e. pests suggested by the public), emerging pests, pests that required further analysis and more recently all pests raised through consultation on the proposal.</p> <p>Any cost benefit assessment with qualitative values will be hard to quantify. The methodology used to quantify benefits is provided and is representative of approaches undertaken by other Councils tasked with quantifying such values.</p>

### Section: Plan Layout

Submission Number:	31: 1	Submission Type:	Oppose
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	Consideration given to redrafting the plan for clarity		
Decision Sought:	<p>The proposed RPMP is not particularly clear or easy to read. The plan includes a lot of duplication, with pest species descriptions repeated multiple times and rules for each pest not clearly presented.</p> <p>We request that serious consideration be given to redrafting the plan for ease of use.</p>		
Council Decision:	Comment noted		
Reasons:	Although Council recognises this RPMP duplicates itself, the current layout of the RPMP reflects the nationally agreed template developed to ensure consistency between pest management plans.		

### Section: Strategic Direction

Submission Number:	19: 3	Submission Type:	Seek Amendment
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## Regional Pest Management Plan Council Decisions by Section

Submitter:	Waikato Regional Council		
Submission Summary:	We note that there are no site-led programmes contained in the RPMP and assume that any work of this nature is non-regulatory, containing no rules or prescriptions under the Biosecurity Act.		
Decision Sought:	If this is the case it may be useful to state this more clearly in the opening chapters, and/or in the strategic direction section (page 1, paragraph five) and under or as part of the third row in the table 'supporting pest management initiatives that protect regional biodiversity'.		
Council Decision:	Accept in Part		
Reasons:	<p>BOPRC undertakes pest management to protect the significant values of individual sites as part of Council's non-regulatory biodiversity programme, which is funded and managed outside of the RPMP. This is discussed in the strategic direction section of the RPMP (pg. 1) and in section 5.2 – Pest Management Programmes.</p> <p>The following amendments are recommended to the section titled Council's Pest Management Strategic Direction/ Te Aronga Rautaki Patu Kirearea a Toi Moana (pg. 1).</p> <p>A number of Council core activities contribute directly to pest management and in some cases a different approach to pest management is required. For example, to protect high value sites such as biodiversity areas a site led approach is often required. Rather than focusing on individual pest species, all pests within a high value site need to be managed. In some cases this may include pests other than those regulated by the Proposed RPMP. For these reasons, the Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme.</p> <p>The following changes to Section 5.2 (pg 23) have been made:</p> <p>The National Policy Direction also identifies "Protecting Values in Places" as an intermediate outcome. Bay of Plenty Regional Council has opted to use non-regulatory approaches to protect specific values in specific places and so these site-led rules do not feature in this Plan. The non-regulatory site-led approach specifically for protecting biodiversity is supported through the strategic direction (see Pages 1-2).</p>		
Submission Number:	12: 2	Submission Type:	Seek Amendment
Submitter:	Whakatohea Mussels		
Submission Summary:			
Decision Sought:	<p>Include a bullet point:</p> <p>If new pests occur in the region, they will be acted on efficiently and immediately and where appropriate the new pests will be added to the Regional Pest Management Plan.</p>		
Council Decision:	Reject		
Reasons:	If new pests arrive in the region, Council will undertake a risk assessment to determine the potential impact of the pest before it agrees to manage it through a small scale management programme as provided for under the Biosecurity Act 1993. Inclusion of new pests will be considered through RPMP review processes.		
Submission Number:	12: 3	Submission Type:	Seek Amendment
Submitter:	Whakatohea Mussels		
Submission Summary:	To ensure marine farming and aquaculture is recognised as part of the regional farming 'landscape'.		
Decision Sought:	<p>Amend bullet that promotes on-farm biosecurity and add an additional bullet as follows:</p> <p>Promoting land based on-farm biosecurity Promoting marine farm / aquaculture biosecurity</p>		
Council Decision:	Accept		
Reasons:	Amended bullet point that promotes marine farming and aquaculture biosecurity in the Strategic Direction section of the RPMP.		
Submission Number:	19: 2	Submission Type:	Support
Submitter:	Waikato Regional Council		

## Regional Pest Management Plan Council Decisions by Section

Submission Summary:	WRC endorses the overview and notes that it is good to have a succinct summary of how BOPRC will demonstrate leadership in biosecurity matters.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	28: 7	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	<p>"A large number of well-established pests cannot be technically defined as pests under the Biosecurity Act as they do not meet the legislative thresholds."</p> <p>1. This quote from the RPMP is only substantiated within the RPMP at s.2.2.1, Part 5 (p.10) by the remark: "A harmful organism is assigned pest status if included in a pest management plan (also see the prerequisites in s69-78 of the Biosecurity Act)"</p> <p>2. Whilst many non-native plants within natural environments are not pests, it is not correct to specify that " a large number of well-established pests cannot be technically defined as pests under the Biosecurity Act as they do not meet the legislative thresholds." The Biosecurity Act (s.5) specifies that an organism is a pest if it has adverse harmful effects on economic wellbeing, the environment, human health, enjoyment of the natural environment, and the relationship between Maori and their (values).</p> <p>3. Examination of s.69-78 of the Biosecurity Act does not exclude any of the pests which have till now been included In the Operative RPMP, nor does it exclude those Non-RPMP pests which are listed at Appendix 1 of the RPMP, nor those serious Bay of Plenty pests that don't appear in either of those lists.</p> <p>4. It's neither statutorily correct, nor appropriate as guardians, to essentially ignore some serious pests (particularly plant pests) which threaten to dominate and transform the natural environment of the Bay of Plenty, thereby losing our regional character. Just a handful of unmanaged (Non-RPMP listed) pest plant species, including: Taiwan cherry, mignonette vine, climbing asparagus fern, wild jasmine, moth plant, grey willow and woolly nightshade, have the potential to completely transform our native forests and riparian margins and wetlands from floor to canopy within a matter of only a few decades. The following Strategic Direction statement - "However, this does not mean Council steps away from managing these pests. The strategic direction section of the Proposed RPMP identifies how Council will address the issue of "non-regulatory" pests . Examples of those pests are included in Appendix 1"- does not give any assurance that a dramatic demise of our natural environmental character and values will be averted through the RPMP.</p>		
Decision Sought:	I submit that the all serious plant pests, not just those examples in Appendix 1, should be included in the body of the RPMP. Alternatively, if those same pests are not included in the body of the RPMP then they should have meaningful and effective management actions ascribed to them within Appendix 1.		
Council Decision:	Accept in Part		
Reasons:	<p>A regional council is not legally obliged to manage a pest or other organism unless it chooses to do so.</p> <p>For a specific pest to be included in the RPMP, Council must be satisfied the proposal has merit as a means of eradicating or effectively managing the pests. Council must be satisfied it has the resources to manage the pest and the pest management objective can be met.</p> <p>However Council has amended Para 4, Page one of the strategic direction:</p> <p>A large number of well-established pests cannot be technically included as pests under the Biosecurity Act 1993 as they do not meet the legislative thresholds (for example the pest management objectives are unlikely to be met or the costs to manage the pest outweigh the benefits).</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 8	Submission Type:	Support in Part
Submitter:	Nautilus Contracting		
Submission Summary:	<p>1. I support a site led approach within naturally biodiverse areas and protected natural areas, especially where all pests within a high value site need to be managed. However, the above remarks do not provide any surety of actual BOPRC participation in, or tangible support for, such site led management. Without inclusion of significant pest plants into the main body of the RPMP (rather than as Non-RPMP pests in Appendix 1) there is every possibility that those pests will be ignored by the proposed RPMP 'toolbox'.</p> <p>2. The natural environment in the Bay of Plenty which is in private ownership and is protected in perpetuity by various covenant mechanism is extremely significant. These protected features range from small wetlands to vast tracts of mature native forest. With regard to the cumulative size of these features, the BOPRC's involvement in this is minimal. Most of these sites are monitored by the agencies which the covenants favour. Collaboration with BOPRC staff in these features is minimal as the BOPRC focus and management structure is catchment protection (minimising sediment entering waterways by 100 yrs retirement plans involving fencing and planting- not always native planting), rather than protecting ecological values and sustaining pest management within those sites.</p> <p>3. Also, in respect to Protection Areas on private land, a significant pest threat comes from neighbouring properties where, for instance: woolly nightshade, Taiwan cherry, climbing asparagus fern and pampas are re-infesting protected bush; or grey willow, Tradescantia and Glyceria are washing downstream into legally protected wetlands or riparian margins. To effectively manage such incursions requires an extension of site-led management to exacerbator neighbours in the absence of including the compulsion to control notable pests that are not in the body of the RPMP.</p>		
Decision Sought:	<p>If a site led pest management approach is to be retained as a significant component of the RPMP then I submit that this needs to be strengthened by way of greater certainty and directives to BOPRC staff to ensure that it is a real and workable mechanism which supports the environmental efforts of other agencies such as district councils, QEII, Landcare Trust, Nga Whenua Rahui, and some struggling private landowners.</p> <p>Also, to ensure that it goes beyond the limits of the medium-term riparian covenant areas that BOPRC is engaged with. To this end I submit that an appropriate tool should be included at Table 10 of the RPMP and an appropriate rule or rules written at Table 11 for site led pest management.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>BOPRC undertakes pest management to protect the significant values of individual sites as part of Council's biodiversity programme, which is funded and managed outside of the RPMP. This is discussed in the strategic direction section of the RPMP (pg. 1) and in section 5.2 – Pest Management Programmes.</p> <p>The following amendments are recommended to the section titled Council's Pest Management Strategic Direction/ Te Aronga Rautaki Patu Kirearea a Toi Moana (pg. 1).</p> <p>A number of Council core activities contribute directly to pest management and in some cases a different approach to pest management is required. For example, to protect high value sites such as biodiversity areas a site led approach is often required. Rather than focusing on individual pest species, all pests within a high value site need to be managed. In some cases this may include pests other than those regulated by the Proposed RPMP. For these reasons, the Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme.</p> <p>The following changes to Section 5.2 (pg 23) are recommended.</p> <p>The National Policy Direction also identifies "Protecting Values in Places" as an intermediate outcome. Bay of Plenty Regional Council has opted to use non-regulatory approaches to protect specific values in specific places and so these site-led rules do not feature in this Plan. The non-regulatory site-led approach specifically for protecting biodiversity is supported through the strategic direction (see Pages 1-2).</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	30: 1	Submission Type:	Neutral
Submitter:	New Zealand Transport Agency		
Submission Summary:	The RPMP makes mention of a site-led approach where pests in high value sites need to be managed, which may include species other than those regulated by the proposed RPMP. The Transport Agency would like to understand whether Council has identified any of these high value areas either within the road corridor or adjoining it.		
Decision Sought:	Further discussion. Understanding of areas of high value relevant to the Transport Agency		
Council Decision:	Comment noted		
Reasons:	A quick desk top analysis shows there are 56 Priority Biodiversity Sites (not Significant Natural Areas) within 50m of State Highways. How they are managed can form part of future efforts undertaken as part of the MOU.		
Submission Number:	30: 2	Submission Type:	Neutral
Submitter:	New Zealand Transport Agency		
Submission Summary:	The RPMP seeks to support the efforts of landowners/occupiers and communities to manage established pests and prevent pest spread. The pathway management approach is a measure that Council has identified as a way to achieve this. The Transport Agency would like to understand if industries such as forestry and earth moving will be considered in the pathway context.		
Decision Sought:	Further discussion. Understanding which industries will be subject to the pathway management approach		
Council Decision:	Accept in Part		
Reasons:	If a pathway management plan is developed (no Council decision has been made at this stage), the Biosecurity Act 1993 requires Council to be satisfied with adequate consultation and engagement undertaken with key stakeholders. Key beneficiaries and exacerbators must be identified and that would inform who needs to be involved in the pathway management process.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	30: 3	Submission Type:	Seek Amendment
Submitter:	New Zealand Transport Agency		
Submission Summary:	The RPMP outlines Council's intention to work in partnership with other parties that have pest management responsibilities and interests, including the Crown. It is recommended that 'Crown entity' be included in the following sentence: "Working with the Crown and Crown entities to establish agreed understanding around potential boundary pests."		
Decision Sought:	Additional reference to 'crown entities'		
Council Decision:	Accept		
Reasons:	Reference to crown entities included.		
Submission Number:	31: 14	Submission Type:	Support in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>This section states that a "non-regulatory site-led approach" will be taken to protecting specific values in specific places.</p> <p>The mechanism of "protecting values in places" is not specifically adopted as a tool within the RPMP; however, there is a connection (of sorts) with mention within the Strategic Direction of the RPMP of possible site-led approaches to protect high value sites. We submit that if site-led management is to be a mechanism for implementing the RPMP then this should include details on the circumstances in which it will be adopted and specifically what it will entail.</p> <p>It's also noted that the RPMP anticipates development of pathway management plans, that will effectively be an extension of the RPMP. We submit that these plans should be provided to all submitters on this RPMP for feedback prior to being adopted by BOPRC. WBOPDC supports a site-led approach within naturally biodiverse areas and protected natural areas, especially where all pests within a high value site need to be managed. However, commentary in pages 1 and 2 does not provide any surety of actual BOPRC participation in, or tangible support for, such site-led management. Without inclusion of significant pest plants into the main body of the RPMP (rather than as Non-RPMP pests in Appendix 1) there is every possibility that those pests will be ignored by the proposed RPMP 'toolbox'.</p> <p>Through the District Plan Protection lot Rules, and Community Benefit lot Rules, the WBOPDC has perpetual protection covenants over approximately 400 sites. Several private properties have multiple Protection Areas so there is well in excess of 400 ecological features protected by covenants in favour of WBOPDC. These protected features range from small wetlands to vast tracts of mature native forest. The cumulative size of the natural environment protected in perpetuity by this mechanism is only exceeded in the Bay of Plenty by land under the control of DOC. All of these sites are monitored on an as land under the control of DOC. All of these sites are monitored on an as-required basis by WBOPDC - the average inspection frequency is about three-yearly. Some of these privately-owned ecological features have common interests with BOPRC (e.g. an overlapping BOPRC Environmental Plan), however past efforts by WBOPDC to work collaboratively with BOPRC staff have not always been successful. WBOPDC therefore seek greater surety through the RPMP that the support for site-led management proposed in the Strategic Direction will in fact be adequately resourced to ensure its success.</p> <p>WBOPDC are concerned that generally the BOPRC focus and management structure is catchment protection (minimising sediment entering waterways by 100 year retirement plans involving fencing and planting - not always native planting), rather than protecting ecological values and sustaining pest management within those sites.</p> <p>Also, in respect to Protection Areas on private land, a significant pest threat comes from neighbouring properties where, for instance: woolly nightshade, Taiwan cherry, climbing asparagus fern and pampas are re-infesting protected bush; or grey willow, Tradescantia and Glyceria are washing downstream into legally protected wetlands or riparian margins. To effectively manage such incursions requires an extension of site-led management to exacerbator neighbours in the absence of including the compulsion to control notable pests that are not in the body of the RPMP.</p> <p>If a site led pest management approach is to be retained as a significant component of the RPMP then we submit that this needs to be strengthened by way of greater certainty and directives to BOPRC staff to ensure that it is a real and workable mechanism which supports the environmental efforts of other agencies such as WBOPDC, and some struggling private landowners, and goes beyond the limits of the medium-term riparian covenant areas that BOPRC is engaged with. To this end we submit that an appropriate tool should be included at Table 10 of the RPMP and an appropriate rule or rules written at Table 11 for site led pest management</p>		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	<p>Amend to provide clarity as to when and how a site-led approach will be used.</p> <p>Amend tables 10 and 11 to provide appropriate tools.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>The following text has been added to clarify Council's site led approach is picked up through its biodiversity programme:</p> <p>"The Proposed RPMP has adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme".</p> <p>Council does not agree with the inference that it is not focusing on protecting ecological values and sustaining pest management within those sites. By way of example, BOPRC and Department of Conservation have developed a shared set of 430 'Priority Biodiversity Sites' (PBS) for our region. The level of financial support available for a Priority Biodiversity Site varies depending on the nature of the site (more threatened ecosystem types attract higher grant rates), and the type of work required. In general Council will fund activities on a 50:50 cost share basis provided they meet our criteria, but there are certain higher-priority sites and actions which attract grant funding of up to 100%.</p> <p>To help ensure the achievement of these goals management prescriptions were prepared for each site. This included the identification of threats to a site including pest plant species – not limited to those included in the RPMP. These are only those with a specific biodiversity target not those involving riparian management plans that involve riparian fencing, planting (generally with indigenous species) and involving pest plant control over a number of years. With a target of a minimum of 4 'new' PBSs sites to be signed up on an annual basis.</p> <p>The biodiversity protection area of work is site lead and the need for this to be covered by the RPMP would be a doubling up of efforts, less effective and efficient resulting in the reduction of potential outcomes.</p>		
Submission Number:	32: 1	Submission Type:	Oppose in Part
Submitter:	Heather Donald		
Submission Summary:	<p>The Council's Pest Management Strategy document appears on the face of it a cosmetic approach to the management of pest management in the Bay of Plenty Region.</p> <p>This document also appears to be a carefully worded document to a winding down of the "on the ground" inspections with the reliance on data base inputs for monitoring.</p> <p>As an example on Page 71 the indicators to monitor on the success of the 'Sustainable Control Programme' is to measure the "numbers of reports and requests for advice made by the community. and Number of complaints received about these pests .</p> <p>These monitoring and outcomes do not relate to the objective for this activity as set out in table 10 on page 71. The above is a common theme for this document.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Decision sought is unclear.		
Submission Number:	35: 1	Submission Type:	Oppose in Part



## Regional Pest Management Plan Council Decisions by Section

Submitter:	QEII National Trust		
Submission Summary:	<p>Generally I believe the Regional Council does good work.</p> <p>I support the Billion Trees initiative but it could easily become 'The Billion Weeds'. If not managed properly planting sites will become favorable habitat and refuge for plant and animal pests. The Government and anyone familiar with community planting days must realise it is easy to get people enthused about planting trees. However the planting is the easy part while the ongoing management can be laborious, expensive and often neglected. A recipe for more pests.</p> <p>The Regional Council has weeds like Japanese honeysuckle that are not prioritized because the 'horse has bolted' and it's too late to turn around. I believe the 'goal posts have moved' and any weed species that threaten plantings should attract more control. The economics of failed weed infested native reveg plantings must be very poor. I manage a 30 year old native planting in Te Puna where the canopy is threatened by climbing weeds (mostly Japanese honeysuckle) and requires weed control contractors annually. The prospect of allowing the spread of weeds into more and more areas does not seem sustainable especially when the owner can still be battling the same problem 30 years later. I monitor 100 native sites and have monitored Regional Council sites in the past and can point to examples where they should be returned to pasture and cattle until the weeds are under control, and then try again!</p> <p>My experience is climbing weeds are the most threatening with Japanese honeysuckle, madeira vine, and moth plant getting special mention. Climbers threaten canopy, while canopy should be the highest priority to save and protect.</p>		
Decision Sought:	<p>I suggest the plant descriptions in the Plan should include an estimate of the number of years a weed species will threaten a new native planting. Further it should indicate the height of canopy it can threaten. For example, A Taiwanese Cherry seed dropped by a bird will grow up through and over top dense native canopy up to 15m high or 30 years old. With these estimates the land owner and Council can consider the threat and ongoing costs of maintenance verses a more thorough attempt at eradication pre planting. If the threats are recognized and highlighted it may encourage more action now.</p> <p>Established and mature bush is far more valuable than future plantings. Its a shame the slogan isn't 'A Billion Trees Saved". Financial contributions towards protecting our ecological remnants is most welcome and encouraging to land owners. Protecting what we already have should take priority over the new, unless for a special purpose.</p> <p>Financial incentives for maintaining pest free properties may be encouraging to owners, maybe by rates relief. Further, Zespri could look at a bonus for orchards that meet high standards and use this in marketing. Clean shelter belts in orchards would help.</p> <p>Pest free corridors and pest free towns are worthy concepts, along with community group initiatives.</p>		
Council Decision:	Accept in Part		
Reasons:	The reason the accompanying cost benefit analyses include a 50 year assessment is because some pests will take decades to reach their full extent in a region, Therefore pests at early stages of their invasion will incur most of their impacts well beyond the standard 10 year assessment duration.		
Submission Number:	49: 2	Submission Type:	Support
Submitter:	Regional Aquaculture Organisation		
Submission Summary:	Support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	50: 1	Submission Type:	Support
Submitter:	Auckland Council		
Submission Summary:	We support the strategic direction presented and the overall Proposed RPMP for the Bay of Plenty region: appropriately adopting a species led approach to pest management and a site led approach for occasions including high value site pest management		
Decision Sought:			
Council Decision:	Comment noted		

## Regional Pest Management Plan Council Decisions by Section

Reasons:	Support for site led approach noted		
Submission Number:	54: 2	Submission Type:	Not Applicable
Submitter:	Department of Conservation		
Submission Summary:	<p>Prevent pests entering and establishing in the Bay of Plenty</p> <ul style="list-style-type: none"> <li>The Department supports the focus on preventing pests entering and establishing in the Bay of Plenty. This may require increased focus on surveillance for new to region pests which may include the Council leading their eradication. We acknowledge that this may result in a reduction in Council intervention in the management of widespread pests as priorities change.</li> </ul> <p>Manage pests when it is practical and cost effective to do so, using Council's regulatory and/or operational roles</p> <ul style="list-style-type: none"> <li>The Department acknowledges the need for Council to consider their intervention in pest management in terms of practicality and cost-effectiveness.</li> </ul> <p>We recognise generally that implementation of the RPMP requires sufficient resourcing. We encourage Council to work with land owners/occupiers and all other stake holders as may be appropriate to uphold their responsibilities under the RPMP. Similarly, we support continued focus on RPMP achievement by appropriate Council resourcing of Council led programmes.</p> <p>In addition, we would like to encourage consideration of long-term gain by increasing investment in the more immediate term. This may be the case with incursion or bio-security surveillance type initiatives. Alternatively, in situations where a pulsed intensive effort would result in long-term savings. An example that we would like to discuss further is a collaborative approach to eradicate goats from parts of the Bay of Plenty (see more on this point below).</p> <p>Support the efforts of landowners/occupiers and communities to manage established pests and prevent pest spread</p> <ul style="list-style-type: none"> <li>The Department supports the strategy to support land owners/occupiers and communities to manage established pests and prevent pest spread. Particularly where this can protect and enhance regional biodiversity. We support the benefit of pest management education and advice that Council has committed to. We strongly support the objective of embedding pest management considerations into Council decisions and agreements with landowners and occupiers.</li> </ul> <p>We support and acknowledge the importance of regulating the movement, distribution and release of pests to reduce risk in spreading pest populations.</p> <p>Work in partnership with other parties that have pest management responsibilities and interests</p> <p>The Department seeks to work in partnership with the Council with the implementation of the RPMP within each agencies legislative context. We anticipate that the MOU dated 17 August 2018 will inform the way we work together in this respect. Particularly in relation to agreeing priorities and annual work programmes. The Department can provide benefit in Council operations and decision-making in the provision of local knowledge, particularly in regards to species specific information.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

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## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	54: 3	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	The Department supports the investigation and development of Pathway Management Plans or other non-regulatory pathway management initiatives where these may be an effective means of managing pest spread. These may have application for island and marine biosecurity in the region. We support implementation of the 'check, clean, dry' mantra where appropriate and consideration and management of issues such as kauri dieback and myrtle rust through pathway management plans.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

<b>Section: 1.2 Purpose</b>
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Submission Number:	5: 1	Submission Type:	Support
Submitter:	Lakes Water Quality Society		
Submission Summary:	Support purpose.		
Decision Sought:	Retain Purpose.		
Council Decision:	Comment noted		
Reasons:	Retain purpose		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 10	Submission Type:	Seek Amendment
Submitter:	Nautilus Contracting		
Submission Summary:	<p>1. This submission agrees that the RPMP may indeed "efficiently and effectively manage or eradicate specified organisms in the Bay of Plenty region"; however, it will not "maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach". There are a number of pests which pose serious threats to the Bay of Plenty but they do not feature in any active management mechanism in this RPMP.</p> <p>2. If the imposition of undue effects upon others is the only rationale, then the purpose of the RPMP ignores the natural character and intrinsic taonga values of the natural environment including indigenous vegetation and habitats of indigenous fauna, as addressed in the Regional Policy Statement (Policy MN2B) and the Biosecurity Act (ss.70 &amp; 71).</p>		
Decision Sought:	I submit that the stated purpose of the RPMP should extend beyond undue effects upon others; it should include stewardship of the natural environment including its natural character and indigenous values.		
Council Decision:	Reject		
Reasons:	The purpose includes minimising actual and potential adverse effects. This is wide in scope and includes effects to natural and developed ecosystems, ecological processes and biological diversity (as set out in the Biosecurity Act 1993). The purpose comes from the nationally agreed RPMP template.		

Submission Number:	31: 5	Submission Type:	Oppose
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>If the imposition of undue effects upon others is the only rationale, then the purpose of the RPMP ignores the natural character and intrinsic taonga values of the natural environment including indigenous vegetation and habitats of indigenous fauna, as addressed in the Regional Policy Statement (Policy MN2B) and the Biosecurity Act (S.70 &amp; 71).</p> <p>We submit that the stated purpose of the RPMP should extend beyond undue effects upon others; it should include stewardship of the natural environment including its natural character and indigenous values.</p>		
Decision Sought:	Amend part 1.2 to read: "Yet, only where individual action or inaction in managing pests imposes undue effects on others or the environment is regional management needed."		
Council Decision:	Reject		
Reasons:	The purpose includes minimising actual and potential adverse effects. Effects considered is wide in scope and includes effects to natural and developed ecosystems, ecological processes and biological diversity (as set out in the Biosecurity Act 1993). The purpose comes from the nationally agreed RPMP template developed collaboratively by regional councils across the country.		

### Section: Plan in General

Submission Number:	11: 2	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	<p>1.2 Page 5 "Many organisms in the Bay of Plenty region are considered undesirable or a nuisance. Yet anywhere individual action is managing pests "imposes undue effects on others - is regional management needed?". Consideration of costs versus benefits or only where the benefit is greater than the cost - should Council be involved? I am not aware of how or what value is placed on Loss. Loss forever is possibly the change of under canopy of our native bush where Wallaby, rabbits, possums and other animal pests over graze. The filtering capacity and water quality is severely reduced. What of the situation where wildling conifers change the landscape value, surface and ground water flows are reduced with an increase in fire risk. However, the costs of delay increases the cost so to do nothing becomes an option? Loss is real!</p>		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	Clarify how loss has been considered
Council Decision:	Comment noted
Reasons:	Quantifying loss is difficult and therefore qualitative factors have been included in the cost benefit assessments. Inputs used for modelling are provided in the accompanying PRPMP document.

### Section: 1.3 Coverage

Submission Number:	21: 1	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	The only way to make inroads into pest moving/movable boundaries management will be through relationships with other authorities. There needs to be consideration given to the bigger picture.		
Decision Sought:	The map needs to have moving/movable boundaries		
Council Decision:	Reject		
Reasons:	The map shows the Bay of Plenty Regional council jurisdiction. Although pests don't respect boundaries, BOPRC has no mandate to manage outside our region.		

### Section: 1.4 Duration

Submission Number:	51: 14	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	Given the 10 year timeframe for the RPMP, we suggest limiting the organisms declared as pests to such a short list is problematic. Should unwanted pests outside the Bay of Plenty Region expand their range, or arrive in New Zealand, BOPRC should be able to undertake a small-scale eradication programme without the need to review the RPMP. Section 100V of the Biosecurity Act does not make it compulsory to list all species to target. The key requirement is that control is not inconsistent with national policy direction.		
Decision Sought:	Add words to the effect that BOPRC's management programme is guided by, but not limited to, the pests that have established viable or persistent populations in the region, at the time of writing.		
Council Decision:	Accept		
Reasons:	<p>The following text has been added to Section 4 of the RPMP:</p> <p>The Biosecurity Act allows regional councils to carry out small-scale eradication or control programmes for unwanted organisms, which are not already named in their RPMP, by developing Small-Scale Management Programmes (SSMP). A SSMP allows Council to use certain powers under the Biosecurity Act to assist with the management of a pest.</p> <p>SSMP are the primary response tool available to regional councils' for managing incursions of unwanted organisms not classified in the regions RPMP. Powers to manage the unwanted organism can only be activated by having a formalised programme in place.</p> <p>Before Council can declare a SSMP the Act requires it must be satisfied that:</p> <ul style="list-style-type: none"> <li>• The pest could cause adverse effects unless early action is taken to control it.</li> <li>• The pest can be eradicated or controlled within three years.</li> <li>• The SSMP is not inconsistent with and is developed in accordance with the National Policy Direction (the Act requires the Minister for Primary Industries to make a National Policy Direction to ensure alignment within New Zealand's biosecurity system).</li> <li>• The costs of the programme are likely to cost less than \$500,000.</li> <li>• Implementing the programme is unlikely to cause significant monetary loss to any person (other than a person who has contributed to spreading the pest by not complying with Biosecurity law).</li> </ul>		

### Section: 2 Planning and Statutory Background

Submission Number:	15: 1	Submission Type:	Support
Submitter:	Northland Regional Council		

## Regional Pest Management Plan Council Decisions by Section

Submission Summary:	Specific species of deer should be better managed to prevent range extensions. Feral pigs should be included as they are vectors of kauri dieback disease.
Decision Sought:	Generally, support however suggest the reconsideration of active management for wild deer and pigs by including these as pest species.
Council Decision:	Reject
Reasons:	BOPRC is not the lead agency in the management of deer and pigs which are declared wild animals under the Wild Animal Control Act 1977. DOC has primary responsibility for the management of these pests under this Act and needs to lead any discussion on how they are managed.

### Section: 2.1 Strategic Background

Submission Number:	21: 2	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	If you are going to continue to allow bottling companies to take billions of litres of fresh water each year, then you need to have the responsibility for the management of it taken off you. You are not good or responsible managers of the fresh water resource or the ecosystems that resource supports. There is nothing in the RPS giving you the responsibility for growing the regional economy, so please stop giving our water away. Protect it - that is actually your job!		
Decision Sought:	Take fresh water out of it.		
Council Decision:	Reject		
Reasons:	This submission point is outside the scope of the Regional Pest Management Plan		
Submission Number:	21: 3	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	Contribution means using your power to enforce change. You rarely do that. Inaction contributes to the problem. You are NOT a toothless taniwha. Use your teeth, or stop saying you can, yet refusing to do so. Be courageous!		
Decision Sought:	Don't say you contribute to a healthy environment community		
Council Decision:	Reject		
Reasons:	This submission point is outside the scope of the RPMP		
Submission Number:	21: 4	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	Because, seriously, there would not be a surveillance problem with Dama wallaby if you guys had have just got access to Tarawera and shot them all when the numbers were lower. They have to be the easiest of all pests to manage. More activity means you can report positive data instead of doomsday data. Come on!		
Decision Sought:	Talk less, act more.		
Council Decision:	Comment noted		
Reasons:	The RPMP is a policy document that sets out pest management objectives. The relief sought of talking less and doing more is difficult to address in a policy document and might best be addressed through implementation planning.		

## Regional Pest Management Plan Council Decisions by Section

### Section: 2.1.1 Council's Biosecurity Framework

Submission Number:	5: 2	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Support RPS provisions. Unless rules are strengthened, LWQS does not accept these provisions can be fulfilled.		
Decision Sought:	Strengthen rules (see submission 5.14)		
Council Decision:	Accept in Part		
Reasons:	Rules have been strengthened in response to submissions		
Submission Number:	28: 5	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	The scope of the RPMP and the mechanisms it contains to fulfil its purpose must not derogate from these RPS policies. However, in light of the fact that several serious plant pests are not included in the body of the RPMP where that would be subject to clear management directives, and that there are no action mechanisms for those pests elsewhere in the pest management toolbox, I submit that the overall effect of the proposed RPMP falls short of fulfilling the requirements of the above-quoted RPS policies - that also has implications respecting the Biosecurity Act s.74(a)(iv).		
Decision Sought:	Conform with RPS by including all serious plant pests in the body of the RPMP where they would be subject to clear management directives.		
Council Decision:	Reject		
Reasons:	The RPS policy quoted does not limit its biosecurity scope to those pests listed in the RPMP, rather it seeks a holistic and integrated approach to biosecurity and biodiversity issues. The strategic direction provided for pest management supports this policy.		
Submission Number:	28: 6	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	<p>The RPMP covers the same 10-year period as the BOPRC Long Term Plan (2018-2028). The BOPRC 10-year budget forecast for regional pest management averages \$4.9 million/year; within the same forecast period the total BOPRC average annual budget is \$164 million. This equates to less than 3% of the annualised BOPRC budget for regional biosecurity and pest management.</p> <p>I submit that the overall effect of the proposed RPMP will fall short of fulfilling the above-stated Long Term Plan objectives -Viz. it will not adequately protect our natural environment because there is no meaningful recognition of, and action plan for control of some serious plant pests within this region.</p>		
Decision Sought:	Implement a RPMP that will conform with the BOPRC Long Term Plan requirements, as stated immediately above, by including all serious plant pests in the body of the RPMP where they would be subject to clear management directives.		
Council Decision:	Accept in Part		
Reasons:	<p>Council considered funding implications at its workshop on 13 November 2019.</p> <p>While the current budget of \$2.3M would be adequate to move the region towards the pest management outcomes of the PRPMP, it is inadequate to deliver a RPMP that incorporates amendments arising from the submission process.</p> <p>Council supported an option that provides additional funding to support capability-building for Maori land owners, initial control work (on problematic Maori land), community initiatives and a stronger focus improving compliance along property boundaries in Western Bay of Plenty.</p> <p>This direction on funding and resourcing levels will guide RPMP planning decisions and development of the next Long Term Plan.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	30: 4	Submission Type:	Neutral
Submitter:	New Zealand Transport Agency		
Submission Summary:	We ask that the results of surveillance and monitoring programmes be shared with the Transport Agency		
Decision Sought:	Information sharing		
Council Decision:	Accept		
Reasons:	This is part of the agreed MOU with NZTA. Also BOPRC is required to report annually (and available to public) on RPMP implementation.		

Submission Number:	51: 15	Submission Type:	Support
Submitter:	Royal Forest & Bird		
Submission Summary:	Support RPS (page 7)		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support for reference to RPS noted.		

Submission Number:	51: 16	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	This section should include forecasting based on pests invading other regional area or indeed overseas pests to prevent pest incursions.		
Decision Sought:	Add wording to indicate forecasting will occur to determine future threats, especially with regard to pests in Auckland, and around the Port of Tauranga, and in coastal environments.		
Council Decision:	Accept		
Reasons:	Amended sentence in section 2.1.1 to state:  The purpose of this monitoring and surveillance is to fully understand risks to the Bay of Plenty region, what a pest's impact may be, how pests are distributed, how fast they are spreading and future threats including where these pests are likely to come from.		

Submission Number:	51: 17	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Funding should also cover needed research to determine pest impacts and new methods for reducing impacts.		
Decision Sought:	Add wording increasing scope of funding to deal with pest threats.		
Council Decision:	Accept in Part		
Reasons:	At a Regional Council workshop on 13 November 2019, more funding was committed to new management methods including excluding pests around lakes. This will be reflected in the Operational Plan but no change will be made to the RPMP.		

### Section: 2.1.2 Biosecurity Framework outside Council

Submission Number:	51: 12	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Reference to pathway management is made on p 2 under Strategic Direction and in Rule 7 p74 where boats and trailers are a pathway for spread of freshwater pests. It is not clear whether this constitutes a pathway management plan. Other pests require pathway management such as marine pests which are moved through aquaculture equipment and recreational and commercial boating. Agricultural pests are also being spread by machinery e.g. alligator weed and purple nutsedge.		



## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	Clarify the pathway management plans for marine and freshwater pests including didymo, and for kauri dieback and myrtle rust. Review pests spread along roads, rail corridors and streams.
Council Decision:	Accept in Part
Reasons:	Our region is not a controlled area for didymo. Note it is in the South Island making it a legal requirement to clean all gear used in water before going from one waterway to another.  The Kauri Dieback Management Programme is a collaborative partnership coordinated by the Ministry for Primary Industries. Biosecurity NZ is no longer collecting, analysing or reporting on myrtle rust.  Council has not committed to developing any pathway management plan for agricultural pests but does include a pathway approach as part of its strategic direction.  Responsibilities for roading authorities are clearly set out in section 3.6 of this Plan. The responsibility for land managers along streams, roads and rail are set out in Section 3.4 (Crown managed land) and the principle measures including rules contained within this Plan. Council has agreed to develop an inter-regional marine pathway management plan. The rules included in this RPMP target known pathways of spread and Council has not committed to developing a pathway management plan to manage aquatic pests.

### Section: 2.2 Legislative background

Submission Number:	21: 5	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	I think there is a problem of being spread too obliged to manage a pest thin, fighting fires all over the place. Pick the things you can do, and do them. Let the or other organism to be community know what those are, and put the controlled responsibility for some things back on the community. There is plenty of funding around for community groups to make change happen.		
Decision Sought:	A regional council is not legally obliged to manage a pest or other organism to be controlled.		
Council Decision:	Reject		
Reasons:	A regional council is legally obliged to show regional leadership in pest management. Development of the RPMP is a key way to do this by identifying what pests need to be managed and how.		
Submission Number:	21: 6	Submission Type:	Oppose
Submitter:	Mawera Karetai		
Submission Summary:	There is no reason at all that anyone should be allowed to keep a ferret/stoat/weasel as a pet.		
Decision Sought:	Have the legislation changed		
Council Decision:	Reject		
Reasons:	<p>Owning ferrets as pets is currently governed by the Department of Conservation, the Ministry of primary Industries and some Regional Councils (where ferrets are included in their Regional Pest Management Plans [RPMP]) and three pieces of legislation (Biosecurity Act 1993, Wildlife Act 1953, Wildlife (Farming Of Unprotected Wildlife) Regulations 1985) (WFUW Regulations).</p> <p>Under section 164C of the Biosecurity Act 1993, ferrets have been declared 'unwanted organisms'. Because of this it is automatically illegal to knowingly: communicate (This includes transporting a ferret from one place to another), release, spread, sell, exhibit or display or breed ferrets without permission from the Ministry of Primary Industries Chief Technical Officer. Anyone can apply to the Ministry of Primary Industries for a permission to carry out activities with ferrets that are prohibited by the Biosecurity Act 1993. The Ministry of Primary Industries will consider and grant or decline such an application. However, if someone wants to hold a ferret as a pet, (and it is not managed by a RPMP) they need a permit from the Department of Conversation (DOC) under the Wildlife Act 1953.</p> <p>Technically neither a Biosecurity Act permission nor a DOC permit is required where a person wishes to possess 3 or fewer ferrets, although it is hard to imagine when this situation might occur, as usually a person would have had to capture or buy the ferret and transport it home, etc – all of which require a Biosecurity Act exemption.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	51: 10	Submission Type:	Oppose
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>The PRPMS is not giving effect to its leadership role under the Act as it is minimizing the action that can be taken under the Act.</p> <p>There is also no clear alignment with pest management plans occurring in other regions.</p>		
Decision Sought:	Alter to align with other regional North Island pest plans and include provisions to assist community programmes.		
Council Decision:	Comment noted		
Reasons:	<p>Regional Council keeps abreast of what other Councils are doing through collective staff working groups. The RPMP reflects a nationally agreed template to ensure consistency across the regions. In some cases BOPRC is part of joint regional initiatives eg wallabies and marine. The point of regional pest management plans is for pest management to be tailored to regional pest management needs and pest management effort that can be resourced. Although there is provision for regional variation the National Policy Direction drives better consistency in pest management policy.</p>		

### Section: 2.2.1 Biosecurity Act 1993

Submission Number:	4: 1	Submission Type:	Not Applicable
Submitter:	Martin and Jane Munro		
Submission Summary:	Council are legally obliged to manage pests and occupiers must be held accountable.		
Decision Sought:	Ensure Council meets its statutory requirements and manages pests.		
Council Decision:	Comment noted		
Reasons:	Section 2.2.1 quotes Biosecurity Act 1993 requirements. The RPMP reflects these requirements.		

  

Submission Number:	28: 2	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	<p>1. With regard to those pests detailed in the body of the RPMP, all requirements of the Biosecurity Act as quoted above have been adequately addressed. However, there are several other pest plants which trigger all of those same sections of the Act but they have been relegated to Non-RPMP pests at Appendix 1, or have not been included in the plan at all - (some are in the Operative RPMP but have disappeared from the proposed RPMP). Sec. 71(d) of the Biosecurity Act deserves special consideration In respect to those pest plants that have not been included.</p> <p>2. In the context of the RPMP, there has been a comprehensive Cost Benefit Analysis (CBA) undertaken by Wildland Consultants for each subject (pest organism/pest) contained within the proposed plan which clearly shows the benefits of its inclusion in the plan would outweigh the costs, after taking account of the likely consequences of inaction or other courses of action. It is evident from the CBA that all pests assessed and included in the RPMP score at or below Level 4 of the Infestation Curve. However, there has been no CBA provided for pests that are not included in the body of the RPMP (viz. the non-RPMP pests and those pests listed in the Operative Plan but not in the proposed RPMP). It would appear that a subjective evaluation has been made to exclude from the RPMP any pest species that might score above Level 4 of the Infestation Curve.</p>		
Decision Sought:	I submit that such an arbitrary decision to exclude those pests would have no CBA foundation and would appear to be weighted in favour of reducing regional costs over the relatively short term. If that is so then it is inconsistent with efficiency, effectiveness and appropriateness measures.		
Council Decision:	Reject		
Reasons:	<p>Council has no obligation to undertake cost benefit analyses for pests not included in the RPMP. Indeed this task could be infinite as the number of species could be endless and cost benefit analyses require resourcing. Council considered all pests raised through the discussion draft phase (i.e. pests suggested by the public), emerging pests, pests in the existing RPMP and pests raised through consultation on the proposal.</p>		

## Regional Pest Management Plan Council Decisions by Section

### Section: 2.2.2 Resource Management Act 1991

Submission Number:	28: 3	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	The scope of the RPMP and the mechanisms it contains to fulfil its purpose must not derogate from these stated RMA responsibilities. However , in light of the fact that several serious plant pests are not included in the body of the RPMP where that would be subject to clear management directives, I submit that the overall effect of the proposed RPMP may fall short of fulfilling the requirements of RMA 30(1)(b) & (ga) and 66(a)&(dl. This is further addressed throughout this submission.		
Decision Sought:	Include all serious plant pests in the body of the RPMP where they would be subject to clear management directives.		
Council Decision:	Comment noted		
Reasons:	The RPMP is mandated by the Biosecurity Act 1993. Council's responsibilities under the Resource Management Act 1991 are outside the scope of the RPMP.		

### Section: 2.2.3 Local Government Act 2002

Submission Number:	28: 1	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	<p>In respect to these extracts from the LGA, and in the context of the RPMP, BOPRC is required to perform its regulatory functions and meet the current and future needs of communities efficiently, effectively and appropriately to present and anticipated future circumstances. With management of pest organisms, the measures of efficiency, effectiveness and appropriateness are determined over time and for some pest organisms the the timeframe can be quite protracted.</p> <p>Therefore, I submit that an RPMP is remiss if it where they would be allows significant pests to spread uncontrolled within the region to seriously and increasingly threaten:</p> <ul style="list-style-type: none"> <li>(i) the natural environment and enjoyment of the natural environment , and / or :</li> <li>(ii) the sustained economic wellbeing of the region (or parts t hereof) and the physical wellbeing of persons, and/or: management directives.</li> <li>(iii) the relationship between Maori and their values.</li> </ul>		
Decision Sought:	Conform with the LGA requirement to operate in an efficient and effective manner over the medium to long term by including all serious plant pests in the body of the RPMP where they would be subject to clear management directives.		
Council Decision:	Comment noted		
Reasons:	<p>Council is obliged to be able to fund implementation of the RPMP.</p> <p>The National Policy Direction sets out pest programmes. A pest can only be included in the RPMP if the programme objective is achievable and the benefits of managing the pest outweigh the costs. Costs and benefits have considered qualitative impacts including recreation and Maori values. Many pests have been considered for inclusion but do not meet these criteria. A few didn't meet the criteria but Council has decided to include them for reasons provided.</p> <p>The pests not included for management still fit within Council's strategic direction and Council will continue to have an advisory role and will support initiatives, landowners and agencies working to manage them.</p>		
Submission Number:	49: 1	Submission Type:	Support
Submitter:	Regional Aquaculture Organisation		
Submission Summary:	Marine farming is a new and growing industry in the Bay of Plenty (especially eastern BOP). There are indications of marine pests in the Waikato, Auckland and Northland regions. These pose a real threat to the industry in the BOP. Vector pathways need to be strictly managed including the passage of contaminated hulls and used mussel farming equipment.		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought:

Council Decision: Comment noted

Reasons: Support for Strategic Direction noted.

### Section: 2.3 Relationship with other pest management plans

Submission Number: 19: 5 Submission Type: Seek Amendment

Submitter: Waikato Regional Council

Submission Summary: The statement (4th line) about there not being any operative NPMPs in New Zealand is not correct. There are several NPMPs in operation and one under development:

National Pest Management Plan (NPMP) for Bovine Tuberculosis (which is given legal effect by the Biosecurity (National Bovine Tuberculosis Pest Management Plan) Order 1998. (refer to [ospri.co.nz/our-programmes/tbfree/about-the-tbfree-programme/legislative-information/](http://ospri.co.nz/our-programmes/tbfree/about-the-tbfree-programme/legislative-information/) and [ospri.co.nz/our-programmes/tbfree/about-the-tbfree-programme/purpose-and-plan/](http://ospri.co.nz/our-programmes/tbfree/about-the-tbfree-programme/purpose-and-plan/))

- National Pest Management Plan (NPMP) for American foulbrood disease (refer to <http://www.afb.org.nz/five-year-plan-strategy>)

- In 2013 KVH developed a National Ps-V Pest Management Plan (NPMP) to ensure the entire industry worked together to overcome the impacts of Ps-V (refer to <http://www.kvh.org.nz/NPMP>) – which may have indirect links for wild kiwifruit as a named pest in the BOP region.

- There is a NPMP being considered for kauri die back disease, which may become an issue for BOPRC in the near future.

Decision Sought: Amend this sentence to include a summary of the NPMPs in operation or under consideration. Add also a sentence to state that "as far as council understands, this proposed RPMP is not inconsistent with any of these named National Pest Management Plans".

Council Decision: Accept

Reasons: Amendments made to reflect operative NPMPs.

Submission Number: 22: 6 Submission Type: Oppose

Submitter: Eastern Region Fish & Game Council

Submission Summary: Eastern Region Fish and Game Council has previously raised the aforementioned concerns around the inclusion of perch and tench in the draft version of the Regional Pest Management Plan. Bay of Plenty Regional Council appears to have acknowledged the legal requirement set out in s 69(1) of the Biosecurity Act 1993 which states:

" To the extent to which a regulation made under this or any other Act is inconsistent with a rule, the regulation prevails. "

Section 2.3 of the PRPMP states that a RPMP must not be inconsistent any regulation, and goes on to conclude that the "Proposed RPMP is not inconsistent with the management intent of the Freshwater Fisheries Regulations in the Bay of Plenty region with regards to the management of perch, tench and rudd." Unfortunately, no analysis or information to support this statement has been included or provided.

The supporting Proposed Regional Pest Management Plan for the Bay of Plenty Region: Meeting the Biosecurity Act requirements also recognises that under s 71 of the Biosecurity Act 1993 council is required to be satisfied that the proposal is not inconsistent with any regulation. The document states that Council is not aware of any regulations with which the PRPMP provisions are inconsistent. No analysis or information to support this statement has been included or provided.

Council considers that the PRPMP is not inconsistent with the management intent of the Freshwater Fisheries Regulations in the Bay of Plenty region with regards to the management of perch and tench, and that they are not aware of any regulations with which the PRPMP provisions are inconsistent. Eastern Fish and Game Council submits that those parts of the PRPMP relating to perch and tench are inconsistent with the imperatives of the Freshwater Fisheries Regulations 1983, the overarching statute -

## Regional Pest Management Plan Council Decisions by Section

the Conservation Act 1987, and the regulations set out in the current Anglers Notice. This includes inconsistencies with the statutory management objectives for the species, parts of the Freshwater Fisheries Regulations 1983 relating to propagation and distribution of sports fish, and also a number of the fishing regulations contained in the current Anglers Notice. It is noted that under s 75 of the Biosecurity Act 1993 council is required to prepare a written report setting out their assessment of submissions. It is expected that the report will be addressing the issues raised in this submission with regards to explaining how the PRPMP provisions are consistent with the legislation and regulations applicable to perch and tench.

Decision Sought:	Fish and Game seeks the deletion of references declaring perch and tench as pest species in the PRPMP, along with any specific duties, actions and responsibilities specified for those species.		
	It is illegal for Regional Councils or any other party (including landowners) to act outside of Fish and Game Sports Fishing Regulations regarding the taking of sports fish. Any person that breaches these Regulations is liable for prosecution.		
Council Decision:	Accept in Part		
Reasons:	To address Fish and Game's concerns regarding conflict with the Conservation Act 1987 text has been added to acknowledge various legislation and regulations apply to the management of sports fish and that the rules in the RPMP are subject to the Conservation Act 1987 and Freshwater Fisheries Regulations 1983 as follows:		
	While perch and tench are defined as pests under this Plan it is acknowledged that they are also 'sports fish' under Part 5A of the Conservation Act 1987. Fish and Game are responsible for managing sports fish under the Conservation Act 1987 and the associated Freshwater Fisheries Regulation 1983. The taking or killing of any sports fish is managed through Angler's Notices developed by Fish and Game annually under this legislation or by special license issued by Fish and Game under section 4A of the Freshwater Fisheries Regulation 1983.		
	Council will engage with, and seek to work in collaboration with Eastern Fish and Game to manage any perch or tench in the Bay of Plenty that present due to any release that has not been legally authorised under either section 26ZM of the Conservation Act 1987 or Regulation 62 of the Freshwater Fisheries Regulation 1983.		
Submission Number:	27: 5	Submission Type:	Seek Amendment
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	This statement is incorrect: there are currently three National Pest Management Plans in operation, including the National Psa-V Pest Management Plan managed by Kiwifruit Vine Health (KVH).		
Decision Sought:	Please amend to recognise current National Pest Management Plans.		
Council Decision:	Accept		
Reasons:	Current National Pest Management Plans have been added.		
Submission Number:	51: 6	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Many pests of indigenous biodiversity are included as Sustained Control in the proposed Auckland Pest Management Strategy, with detailed justification in the CBA for that region. It is hard to see how many of these pests which are also present in the Bay of Plenty, and have been considered pests up till now, are suddenly no longer pests. We are also concerned that there is a large discrepancy in effort between regional councils for various pests. Pest plans will not be effective if they do not include conjoined efforts and targeting the same species. Both Auckland (Site-led Programme for Significant Ecological Areas on parkland in combination with a Sustained Control programme for the whole region) and Gisborne (Site-led) include Phoenix palm not mentioned in the RPMP.		
Decision Sought:	Ensure consistency in approach and pests included with other councils		
Council Decision:	Accept in Part		
Reasons:	The effort for managing different pests (whether it is included in the RPMP and if so which programme) is informed by the cost benefit analysis and those results could vary between regions (or different parts of regions). Auckland Regional Council were mainly in support of the Proposed RPMP.		
	Phoenix palm has been added as an advisory pest. It is recommended that the pest be managed under		

## Regional Pest Management Plan Council Decisions by Section

Council's site-led approach to protect high value sites including programmes such as Environmental Programmes and Coast Care.

Submission Number:	51: 18	Submission Type:	Oppose
Submitter:	Royal Forest & Bird		
Submission Summary:	The plan states that they are consistent in their approach with neighbouring regional councils. We object to this statement since with key species being removed from the current operative plan, the proposed BOP RPMP is not considered consistent with other regions.		
Decision Sought:	A review ensuring consistency with neighbouring regional councils is needed.		
Council Decision:	Accept in Part		
Reasons:	This proposal has been developed under the National Policy Direction which drives consistency between Councils. Regional variation will naturally occur as each regional council has to weigh up the impacts of the pest and the funding required to manage it. Submissions were received from other regional councils - mainly in support.		

### Section: 2.4 Relationship with Maori

Submission Number:	5: 4	Submission Type:	Support
Submitter:	Lakes Water Quality Society		
Submission Summary:	Support provisions. 1) Effective pest management is essential to Protect maori values and high value conservation areas. 2) Support for pathway management approach, particularly in respect of the threat of wallabies (and other pests) where they are at risk of invading high value conservation areas.		
Decision Sought:	Retain provisions. 1) Effective pest management is essential to Protect maori values and high value conservation areas. 2) Support for pathway management approach, particularly in respect of the threat of wallabies (and other pests) where they are at risk of invading high value conservation areas.		
Council Decision:	Comment noted		
Reasons:	Retain provisions. 1) Effective pest management is essential to protect maori values and high value conservation areas. 2) Support for pathway management approach, particularly in respect of the threat of wallabies (and other pests) where they are at risk of invading high value conservation areas.		
Submission Number:	21: 7	Submission Type:	Support
Submitter:	Mawera Karetai		
Submission Summary:	it is so good to have this relationship with Maori, but only when it is meaningful. Don't just tick consultation boxes. Maori should be leading the way as the kaitiaki of the land, water and air.		
Decision Sought:	Make it real		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	21: 8	Submission Type:	Not Applicable
Submitter:	Mawera Karetai		
Submission Summary:	As we can see in all our forests, there are not enough hunters hunting and the numbers are going up. We need to reincentivise pest control. Pest to the plate is a better approach than calling it recreational. The word "Recreational" takes away the urgency to do something now.		
Decision Sought:	Potential to combine recreation interests with pest control is not happening. We need to reincentivise pest control. Pest to the plate is a better approach than calling it recreational. The word "Recreational" takes away the urgency to do something now.		
Council Decision:	Accept in Part		
Reasons:	Bullet point amended as follows:  Potential to combine recreation and mahinga kai interests with pest control (e.g. hunting)		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	49: 3	Submission Type:	Support
Submitter:	Regional Aquaculture Organisation		
Submission Summary:	Commercial maori operators are key players in the marine farming industry and these investments require the protection proposed in the Plan		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.		

### Section: 2.5 Relationship with National Policy Direction

Submission Number:	28: 4	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	The mechanism of "protecting values in places" is not specifically adopted as a tool within the RPMP; however, there is a connection (of sorts) with mention within the Strategic Direction of the RPMP of possible site led approaches to protect high value sites. It's also noted that the RPMP anticipates a Pathway Programme will be written in the near future and that this will effectively be an extension of the RPMP.		
Decision Sought:	<p>I submit that if site led management is to be a mechanism for implementing the RPMP then this should be clearly stated that it will be adopted, and in what circumstances it will be adopted, and specifically what this will entail.</p> <p>I also submit that this programme should be provided to all submitters on this RPMP for feedback in the standard statutory manner prior to be adopted by BOPRC.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>It is clearly stated in this proposal that site led rules will not be used in the RPMP (section 5.2).</p> <p>Council previously considered site-led rules to manage well-established pests but didn't support this approach for two main reasons:</p> <p>Firstly, a number of BOPRC's core activities contribute directly to biodiversity outcomes, including pests not in the PRPMP. To protect biodiversity values, a site led approach is preferred which focuses on the biodiversity values to be protected. Rather than focusing on individual pest species, all pest threats within a high value site need to be managed. BOPRC's current biodiversity approach is voluntary and bringing in site led rules could significantly change the way staff engage with landowners on biodiversity protection.</p> <p>Secondly, the National Policy Direction has quite specific requirements for site led rules which reduce the flexibility in adapting the biodiversity programme to new threats.</p> <p>Council sees no reason to change the current approach which works well and maintain that site led rules do not align well with BOPRC's other work programmes but recommend the following text is added text to the PRPMP to explain BOPRC's pest management activities that support our voluntary (site-led) biodiversity programme:</p> <p>"The Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme".</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	52: 1	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>We have reviewed the plan against the National Policy Direction for Pest Management (NPD). In our opinion the proposed plan is not inconsistent with the NPD.</p> <p>We note that Section 2.3 (pg. 12) states that “At the time of writing this Proposed RPMP, no National Pest Management Plans are in operation”. However, there are currently three NPMP operational: bovine Tb, American Foulbrood and Psa-V. We wondered if this is intended to refer to National Pathway Management Plans (which the RPMP may not be inconsistent with)?</p>		
Decision Sought:	Amend		
Council Decision:	Comment noted		
Reasons:	Support noted		
	Reference to NPMPs has been added,		

### Section: 3 Responsibilities and Obligations

Submission Number:	15: 2	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Generally support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	48: 2	Submission Type:	Support
Submitter:	Rotorua Lakes Community Board		
Submission Summary:	We support Council's approach to working with iwi		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

### Section: 3.1 The Management Agency

Submission Number:	28: 11	Submission Type:	Neutral
Submitter:	Nautilus Contracting		
Submission Summary:			
Decision Sought:	I request a copy of the draft Operational Plan that BOPRC intends will be used to implement the RPMP.		
Council Decision:	Accept in Part		
Reasons:	The Operational Plan has to be developed within 3 months of this RPMP being adopted and will be available to the public.		



## Regional Pest Management Plan Council Decisions by Section

Submission Number:	31: 6	Submission Type:	Support
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	WBOPDC requests a copy of the draft Operational Plan that BOPRC intends will be used to implement the RPMP.		
Decision Sought:	Retain		
Council Decision:	Accept		
Reasons:	The Operational Plan must be developed within 3 months of the RPMP being adopted. This will be available to the public.		

### Section: 3.2 Condemnation and disposal of receipts

Submission Number:	28: 12	Submission Type:	Not Applicable
Submitter:	Nautilus Contracting		
Submission Summary:			
Decision Sought:			
Council Decision:	Not Applicable		
Reasons:	Invalid submission point		

### Section: 3.3 Responsibilities

Submission Number:	4: 2	Submission Type:	Support
Submitter:	Martin and Jane Munro		
Submission Summary:	Support occupier accountability		
Decision Sought:	Retain provisions that support occupier responsibility.		
Council Decision:	Comment noted		
Reasons:	Retain provisions that support occupier responsibility.		

Submission Number:	21: 9	Submission Type:	Support
Submitter:	Mawera Karetai		
Submission Summary:	Wallaby at Tarawera are an excellent whenua... example is this not being enforced.		
Decision Sought:	Support owner and occupier responsibility		
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	28: 13	Submission Type:	Support in Part
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## Regional Pest Management Plan Council Decisions by Section

Submitter:	Nautilus Contracting
Submission Summary:	<p>Rationale</p> <p>1. This section states that "pest management is an individual's responsibility in the first instance because generally occupiers contribute to the pest problem and in turn benefit from the control of pests." It's agreed that pest management is an individual's responsibility in the first instance; however, our experience is that more often than not occupiers do not knowingly or deliberately contribute to or exacerbate the pest problem - unless their lack of pest control is deemed "contributing to the problem" which fits with the definition of an exacerbator. However, pest animals don't confine themselves to individual properties so individual landowners often have only limited control over pest animals, and frequently for little personal gain. Also, the main mechanisms of pest plant establishment and spread is by the organism's own survival and dispersal adaptations including: root suckering, wind, water, birds, mammals, vehicles/craft etc.</p> <p>Therefore, it appears to be both misleading and inflammatory to state that landowners/occupiers generally contribute to the pest problem. Rather I submit that landowners occupiers have a stewardship responsibility to manage the pests on their land for the wider benefits of the natural and social environment and neighbouring lands. The wording here should be amended accordingly.</p> <p>2. All other elements of s.3.3 are fully Supported, particularly: (i) rights of access by authorised persons for inspection, pest management and compliance, and; (ii) control over propagation &amp; distribution of pests, and; (iii) equitable responsibilities &amp; obligations of private, corporate and Maori landowners and occupiers regardless of land tenure.</p>
Decision Sought:	Expand text to include the statement that "landowners and or occupiers have a stewardship responsibility to manage the pests on their land for the wider benefits of the natural and social environment and neighbouring lands."
Council Decision:	Accept
Reasons:	<p>Text added:</p> <p>Occupiers also have a stewardship responsibility to manage the pests on their land for the wider benefits of the natural and social environment.</p>

Submission Number:	30: 5	Submission Type:	Neutral
Submitter:	New Zealand Transport Agency		
Submission Summary:	With regards to an authorised person entering a place, we ask that the Council contact the Transport Agency and ensure appropriate permission and safety is in place due to the dangerous environment of the road corridor.		
Decision Sought:	Best practice sought in terms of engagement, landowner approval and safety measures		
Council Decision:	Accept in Part		
Reasons:	Health and safety issues although outside the scope of this RPMP could be discussed through annual meetings with NZTA.		

Submission Number:	31: 7	Submission Type:	Seek Amendment
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>This section states that "pest management is an individual's responsibility in the first instance because generally occupiers contribute to the pest problem and in turn benefit from the control of pests."</p> <p>It's agreed that pest management is an individual's responsibility in the first instance; however, our experience is that more often than not occupiers do not knowingly or deliberately contribute to or exacerbate the pest problem - unless their lack of pest control is deemed "contributing to the problem" which fits with the definition of an exacerbator. However, pest animals don't confine themselves to individual properties so individual landowners often have only limited control over pest animals, and frequently for little personal gain. Also, the main mechanisms of pest plant establishment and spread is by the organism's own survival and dispersal adaptations including: root suckering, wind, water, birds, mammals, vehicles/craft etc. Therefore, it appears to be both misleading and inflammatory to state that landowners/occupiers generally contribute to the pest problem. Rather, we submit that landowners/occupiers have a stewardship responsibility to manage the pests on their land for the wider benefits of the natural and social environment and neighbouring lands.</p> <p>The wording here should be amended accordingly. All other elements of 3.3 are supported, particularly: rights of access by authorised persons for inspection, pest management and compliance; control over propagation and distribution of pests; and equitable responsibilities and obligations of private, corporate</p>		

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## Regional Pest Management Plan

### Council Decisions by Section

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and Maori landowners and occupiers regardless of land tenure. We acknowledge the problems in addressing pest species on land where there are multiple owners, however we urge BOPRC to proactively find solutions to deliver the best outcome that sees pest species addressed.

Decision Sought: Amend wording to recognise landowners'/occupiers' stewardship responsibilities and acknowledge that often they do not 'purposefully' contribute to the pest problem.

Council Decision: Accept in Part

Reasons: Text added:

Occupiers also have a stewardship responsibility to manage the pests on their land for the wider benefits of the natural and social environment.

## Regional Pest Management Plan Council Decisions by Section

### Section: 3.4 Crown Agencies

Submission Number:	4: 3	Submission Type:	Oppose
Submitter:	Martin and Jane Munro		
Submission Summary:	Good neighbour rules must stay included in the Proposed RPMP. Especially now it binds the Crown which can allow the use of legal means to enforce.		
Decision Sought:	Include Good Neighbour Rules in the RPMP.		
Council Decision:	Reject		
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of “Good Neighbour Rules” (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.</p> <p>Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020):</p> <p>"However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on the development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council. Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p> <p>An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.</p> <p>Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.</p>		

Submission Number:	19: 6	Submission Type:	Seek Amendment
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## Regional Pest Management Plan Council Decisions by Section

Submitter:	Waikato Regional Council
Submission Summary:	We question why council has not considered Good Neighbour Rules (GNRs) in the Plan (for pest plants at least). In our overview opinion four sustained control pests may 'qualify' – gorse, ragwort, woolly nightshade and possibly lantana. Further explanation is required as to why GNRs weren't considered, either in section 3.4 and/or in section 5.4 under rules (page 25).
Decision Sought:	Consider a more definitive statement as to why GNR's are not considered appropriate, especially if this is still the case after hearings/deliberations.
Council Decision:	Reject
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of good neighbour rules (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.</p> <p>Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020):          "However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on the development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council. Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p> <p>An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.</p> <p>Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.</p>

Submission Number:	28: 14	Submission Type:	Oppose
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## Regional Pest Management Plan

### Council Decisions by Section

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Submitter:	Nautilus Contracting
Submission Summary:	<p>The RPMP states: "There are no Good Neighbour Rules proposed in this Proposed RPMP to bind the Crown (and associated entities)." (Instead,) "Provision has been made for those entities through written agreement provisions in the rules of this Proposed RPMP." It would appear that the provision is to be found at s.5.3.5 of the RPMP wherein it states: "Council may develop MOUs with agencies (including Crown agencies) with pest management responsibilities to establish agreed levels of services to control pests on land they occupy, or to defer enforcement actions in this Plan in preference for pragmatic pest management that contributes to achieving RPMP objectives."</p> <p>It's not possible to submit meaningful comment on this matter as any existing written agreements, or a standard template for any possible agreements which may yet been settled, have not been included as part of the RPMP. That said, within this RPMP, territorial authorities and reading authorities have been expressly excluded from this provision. [That separation may be historic, insofar as the Crown agencies were not subject to the Operative RPMP, whereas territorial authorities have been thus far.] From 12B(2)(d) of the Biosecurity Act it's understood that the RPMP should be fair and equitable.</p> <p>In the context of Crown Agency responsibilities (or otherwise), Table 11- Rule 4 Explanation states: "These rules are not Good Neighbour rules under the Biosecurity Act and therefore do not bind the Crown."</p>
Decision Sought:	<p>I submit that this equitability of responsibility shouldn't mean a diminution of territorial authority responsibilities, rather it should be reflected in Crown agency agreements being consistent with pest management requirements upon territorial authorities which is also akin to corporate and private landowner responsibilities. Put simply, what's the point in private landowners and territorial authorities controlling pests if Crown entities are not required to do the same in the same general areas? I submit that wording to such effect should be included at ss.3.4 &amp; 5.3.5 of the RPMP.</p> <p>I also submit that there should be some manner of responsibility by Crown Agencies for the reasons stated here and other rationale provided throughout this submission. I also submit that it would be helpful to know what management agreements exist or are proposed between BOPRC and Crown Agencies such as DOC, LINZ and KiwiRail. Beyond this I'm unable to make further meaningful submission to s.3.4 of the RPMP without that information .</p>
Council Decision:	Reject
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of "Good Neighbour Rules" (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.</p> <p>Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020): "However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on the development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council. Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p> <p>An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.</p>

## Regional Pest Management Plan Council Decisions by Section

Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.

Submission Number:	29: 1	Submission Type:	Oppose
Submitter:	Federated Farmers		
Submission Summary:	<p>We understand that 'good neighbour' rules are able to now bind the Crown after amendments to the Biosecurity Act 1993. FFNZ asks that good neighbour rules form part of the plan and that any good neighbour rules should not be watered down to ensure that the Crown are treated the same as other landowners.</p> <p>It is the general experience of our members that Crown land, Department of Conservation and Territorial Local Authorities do not proactively control pests, but often rather choose to wait until there are obvious problems and control is therefore more difficult. Farmers are generally the good neighbour and any good practises by the farmer is largely undermined. It is accepted that pest management generally is not effective unless all landowners (including Crown) consistently manage the spread of pest.</p> <p>The negotiated understanding around potential boundary pests between the Regional Council and Crown agencies are of little comfort to our members as they have no means to enforce it and requires the Regional Council to be pro-active, incur costs and navigate a political minefield with agencies it needs to co-operate with.</p> <p>We also consider that rules 3, 4, 5 and 9 should be designated as "Good Neighbour Rules". In summary we consider the reasons are:</p> <ul style="list-style-type: none"> <li>a. If the region is to control a pest it makes sense that the pest does not have a safe haven to breed and multiply in.</li> <li>b. It is also unfair to expect the 'good neighbour' to pay for the problems created by the bad neighbour's lack of pest control. FFNZ believes that the Crown should contribute on the same basis as any other land occupier within the region.</li> <li>c. The bad neighbour benefits from the adjacent landowners that actively controls their pest.</li> <li>d. It ensures plant and animal pest on non-rateable, Crown, Department of Conservation and Council land are adequately funded and controlled.</li> </ul>		
Decision Sought:	<p>That Good Neighbour rules are expressed to bind the Crown.</p> <p>That Rules 3, 4, 5 and 9 are designated as "Good Neighbour Rules"</p>		
Council Decision:	Reject		
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of "Good Neighbour Rules" (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.</p> <p>Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020):</p> <p>"However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on t development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council. Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p>		

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## Regional Pest Management Plan

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An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.

Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.

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Submission Number:	30: 6	Submission Type:	Neutral
Submitter:	New Zealand Transport Agency		
Submission Summary:	The Transport Agency is a crown entity under the Crown Entities Act 2004 and is separate from the Crown. We seek that the wording for Section 3.4 is amended to reflect this. Suggested wording is provided.		
Decision Sought:	Amendment to reflect that the Transport Agency is a crown entity.  Add MOU Holders to title.  Add Crown Agency after Department of Conservation Add Crown Entity after NZTA  Amend wording to read... Memoranda have been signed between BOPRC and Dept of Conservation and BOPRC and NZTA to confirm how pests will be managed on and in places that these organisations are responsible for.  Delete first sentence of last paragraph in greyed out box		
Council Decision:	Accept		
Reasons:	Amendments made.		

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## Regional Pest Management Plan Council Decisions by Section

Submission Number:	31: 8	Submission Type:	Seek Amendment
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>MOUs with Crown agencies may be a useful tool to deliver on the outcomes of the RPMP while acknowledging some of the logistical issues. However, these should not unduly diminish their responsibilities.</p> <p>It's not possible to submit meaningful comment on this matter as any existing written agreements, or a standard template for any possible agreements which may not yet be settled, have not been included as part of the RPMP.</p> <p>That said, within this RPMP, territorial authorities and reading authorities have been expressly excluded from this provision. That separation may be historic, insofar as the Crown agencies were not subject to the Operative RPMP, whereas territorial authorities have been thus far.</p> <p>From 12B(2)(d) of the Biosecurity Act it's understood that the RPMP should be fair and equitable. This equitability of responsibility shouldn't mean a diminution of territorial authority responsibilities, rather it should be reflected in Crown agency agreements being consistent with pest management requirements upon territorial authorities, which is also akin to corporate and private landowner responsibilities. Put simply, what's the point in private landowners and territorial authorities controlling pests if Crown entities are not required to do the same in the same general areas?</p> <p>We submit that wording to such effect should be included at ss.3.4 &amp; 5.3.5 of the RPMP.</p>		
Decision Sought:	Amend to ensure MOU and other agreements with Crown agencies are consistent with pest management requirements upon territorial authorities.		
Council Decision:	Accept in Part		
Reasons:	Agreed MOUs will be publicly available so the regional community is assured the Crown has committed an appropriate level of pest management effort.		
Submission Number:	48: 4	Submission Type:	Neutral
Submitter:	Rotorua Lakes Community Board		
Submission Summary:			
Decision Sought:	We recognise the Council has no ability to regulate or require a Crown Agency to act but we ask that Council nevertheless encourage LINZ to increase funding to meet their responsibilities in controlling pest weeds within the Rotorua Lakes.		
Council Decision:	Accept in Part		
Reasons:	An RPMP can include rules that bind crown agencies however no such rules have been included in this RPMP.		

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## Regional Pest Management Plan Council Decisions by Section

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LINZ and Council have partnered to develop Aquatic Plant Management Plans as requested through LTP submissions. It is hoped that the Plans will provide clarity and direction for freshwater plant pest management. They will also provide something tangible to support agency budgeting and funding bids to third party funders,

<b>Section: 3.5 Territorial authorities</b>
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Submission Number:	28: 15	Submission Type:	Support
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Submitter:	Nautilus Contracting
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Submission Summary:	Support
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Decision Sought:	
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Council Decision:	Comment noted
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Reasons:	Support noted.
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## Regional Pest Management Plan Council Decisions by Section

### Section: 3.6 Roading Authorities

Submission Number: 28: 16 Submission Type: Support

Submitter: Nautilus Contracting

Submission Summary: Support

Decision Sought:

Council Decision: Comment noted

Reasons: Support noted

Submission Number: 31: 11 Submission Type: Support

Submitter: Western Bay of Plenty District Council

Submission Summary: We acknowledge the important role that roading authorities play in controlling pests and agree with the conditions where an adjacent landowner becomes responsible.

Decision Sought: Retain

Council Decision: Comment noted

Reasons: Support noted

### Section: 4 Organisms declared as pests

Submission Number: 10: 7 Submission Type: Not Applicable

Submitter: Jean-Paul Thull

Submission Summary: A hectare of mature gorse fixes the same level of nitrogen into the soil (and often hence the waterways) as a hectare of intensely grazed dairy cows. The nitrification of Tauranga Harbour is leading to prolific sea lettuce growth so reducing nitrification is essential.

Decision Sought: Consider gorse for inclusion.

Council Decision: Accept in Part

Reasons: Gorse is included as a sustained control pest. Although not subject to specific cost benefit analysis, based on analysis of other pests (blackberry and ragwort) it is anticipated that the outcome would be strongly cost beneficial for managing in the sustained control programme. Currently there is no evidence that gorse is a significant contributor of nitrogen to Tauranga Moana.

Submission Number: 19: 7 Submission Type: Seek Amendment

Submitter: Waikato Regional Council

Submission Summary: This list is helpful, so too are the page numbers for each programme and map reference numbers (although having page numbers also for maps would greatly help readers).

However, overall we found the layout of the pest programmes (section 6) rather confusing. For example in Table 1 alligator weed appears in three different programmes and the same description of the weed is duplicated twice more after page 26. This occurs also for several other pests. While it may be an organisational preference this information needs to be only supplied once for readers, but we understand formatting issues around this.

Further, we note that an RPMP's focus is in relation to specific named pests. Following on from this, there could be a dedicated page (or 2) to that specific pest containing all relevant information on that pest that occupiers need to know about. It is confusing to read pest management requirements for a pest in

## Regional Pest Management Plan Council Decisions by Section

three different areas, then consult a map, then look up rules in a different place again.

This may mean duplication of rule wording for each pest but that clarity around each rule for each appropriate pest is probably more legally robust as it spells out the specific rule for that specific pest rather than reliance on a set of generic rules covering say 6-7 pests.

**Decision Sought:** This confusion could be solved by having dedicated pages per pest plant, and pest animal, in alphabetical order BUT with cross referencing tables, also in section 4 after the key list of pests but separated into each of the 4 categories.

**Council Decision:** Reject

**Reasons:** Although Council appreciates the suggested efforts to reduce duplication (and possible confusion) the current layout of the RPMP reflects the nationally agreed template developed to ensure consistency between Regional Pest Management Plans.

**Submission Number:** 19: 8 **Submission Type:** Oppose

**Submitter:** Waikato Regional Council

**Submission Summary:** The words contained in the 'greyed-out box' provide good supporting information. However, we note that only with regard to RPMP-named organisms should the term 'pest' be used, as it has a very clear definition in the Act. The term 'pest' for non RPMP situations is used incorrectly several times and should be replaced with 'organism' in every case, or 'nuisance', or some variation on this wording (just not the word 'pest').

**Decision Sought:** Refer to these as 'a nuisance' or stick with 'organisms', or even 'organisms of interest'. 'Nuisance pest' could be used potentially but it still infers a 'pest' status of some sort, which they are not.

**Council Decision:** Accept in Part

**Reasons:** The term has been changed to Advisory pests and reference to them has been amended:

A large number of well-established pests cannot be technically defined as pests under the Biosecurity Act 1993 as they do not meet the legislative thresholds (for example the pest management objectives are unlikely to be met). However this does not mean Council steps away from managing these pests. The strategic direction section of the Proposed RPMP identifies how Council will address the issue of "non-regulatory" pests. Examples of these organisms are called Advisory pests and they are those pests are included in Appendix 1.

**Submission Number:** 28: 17 **Submission Type:** Oppose

**Submitter:** Nautilus Contracting

**Submission Summary:** I submit that it's not prudent for any significant pest plants to be excluded from active management or control within the RPMP.

**Decision Sought:** Do not exclude any significant pest plants from active management or control within the RPMP. However, if BOPRC still decides to exclude several significant pest plants from active management or control within the RPMP, then as an alternative I submit that other management tools can and should be included in the RPMP; these include: (i) "protecting values in places"; (ii) exacerbator neighbour controls alongside those "places", and; (iii) limited financial or practical assistance in the management of pests in those places. [Such places should include: esplanade and scenic reserves, protected ecological features on private land and other ecological sites where landowners are actively managing pest plants] (see s.1.4above). Also, it should ban propagation, sale and distribution of all pests included in all parts of the RPMP, not only those presently listed in Table 1 of the proposed RPMP.

**Council Decision:** Accept in Part

**Reasons:** The management tools suggested in this submission sit within the pest management strategic direction. Site-led management, financial support and written direction to act will be on a case by case basis.

Sections 52 and 53 manage unwanted organisms regardless of whether they are included in this RPMP.

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 18	Submission Type:	Oppose
Submitter:	Nautilus Contracting		
Submission Summary:	<p>Woolly Nightshade:- Local Authorities and numerous landowners have expended significant resources on controlling woolly nightshade over many years. Woolly nightshade has also been an ongoing covenant monitoring and compliance matter for agencies with interests in legally protected ecological features on private land.</p> <p>Overall, positive progress is being made with woolly nightshade management. However, during the period of the Operative RPMP it has been frustrating for local authorities in the western BOP to see three zones within their territorial boundaries excluded from landowner requirements to control woolly nightshade.</p> <p>I support the extension of woolly nightshade control throughout the entire region but submit that its status in the RPMP should be Progressive Containment in all parts of the region.</p>		
Decision Sought:	Woolly nightshade status should be Progressive Containment in all parts of the region.		
Council Decision:	Reject		
Reasons:	Cost benefit analysis indicates progressive containment throughout the region is not cost-beneficial, except in some areas where distribution is low. A rule focused on boundary control at adjoining compliant properties has been included due to community will to continue investing in controlling this species.		
Submission Number:	28: 19	Submission Type:	Support in Part
Submitter:	Nautilus Contracting		
Submission Summary:	<p>The Operative RPMP has a list of 96 plant pests (excludes Agency spp.); whereas the RPMP has listed only 42 pest plants in Table 1. With the addition of the Non-RPMP pests listed at Appendix 1 it's noted that eight of the plant species that are presently in the Operative RPMP do not appear in either Table 1 or Appendix 1 of the proposed RPMP - (namely: Californian bulrush, Firethorn, Liliun formosanum, Mexican feature grass, Rum cherry, Selaginella, Shield pennywort, Wonder tree). I'm inclined to the opinion that those species don't now present significant threats.</p>		
Decision Sought:	I support the status of all the pest organisms that are listed in Table 1 and I have no objection to the eight plant species mentioned not having a pest status in the proposed RPMP.		
Council Decision:	Comment noted		
Reasons:	Comment noted		
Submission Number:	29: 5	Submission Type:	Support
Submitter:	Federated Farmers		
Submission Summary:	<p>FFNZ supports a continued effort to contain the wallaby population to its current range. They are a 'slow burner' spreading species that once established are very difficult to control and they have potential to spread throughout the region and further. It would be much easier to spend the resources to contain them in their current range than to spread control costs across landowners over a far larger area. The situation with the continually spreading wallaby population in the South Island shows the risks when control is reduced and responsibility largely put back on individual landowners</p>		
Decision Sought:	Retain Wallaby as progressive containment pest.		
Council Decision:	Accept in Part		
Reasons:	<p>Support noted and a split pest management programme for wallabies that includes wallabies as a progressive containment pest inside the core infestation area and wallabies as an Eradication pest outside the core infestation area. A new map showing the pest programme boundaries has been included as Map 11 in the RPMP. A split programme reflects Council's actual management approach with increased efforts to manage wallabies outside the core infestation area.</p>		

# Regional Pest Management Plan

## Council Decisions by Section

Submission Number:	51: 21	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>We support the inclusion of the species listed but we are very disappointed to see this table much reduced from the priority species for control list in the current Regional Pest Management Strategy.</p> <p>Feral deer and pigs need to be reinstated on this table. Feral deer and pigs are causing enormous damage in sites across the region. Feral deer for example are roaming through private land and affecting biodiversity restoration in some places e.g. Manawahe, Otanewainuku. Recreational hunting is not an effective management tool for pigs or deer - site-led management is absolutely necessary to prevent these species from conducting further damage across the region. This is particularly important because of the link between Kauri dieback spread and pigs vectoring the disease. In areas with pine plantations pigs should be targeted prior to falling to insure they are not vectoring the pathogen into new areas.</p> <p>The list of weeds is particularly unambitious on this Table. We acknowledge that at a time of scarce resources then priorities must be made. However, listing all the species actually causing harm is necessary to have the plan mandate to control them where necessary. Prevention is the optimal measure where harm is already apparent e.g. Phoenix palm. At a minimum we would expect the inclusion of environmental weeds such as climbing asparagus <i>Asparagus scandens</i> and Cape ivy <i>Senecio angulatus</i> on this table. All should be listed to prevent them being sold in nurseries and becoming a continual spreading pest which will have biodiversity impacts and will be expensive in the future.</p> <p>Control of German wasps and Paper wasps is considered important for maintaining specific biodiversity values.</p> <p>Additional marine species should be included with special regard to the spread with marine aquaculture equipment.</p>		
Decision Sought:	<p>Conduct a review of the listed species to ensure the maximum number is included (especially marine species) rather than the minimum which appears to be the case here.</p> <p>Reinstate all of the species classified as Restricted in the Operative Plan but delete the exceptions in Advice Note 2. These species, with the addition of the others mentioned, should be included within the plan, either as Sustained Control or Site-led Protecting Values in Places.</p> <p>Add cotoneaster, royal fern, Didymo, phoenix palms, Taiwan cherry</p> <p>Include Kauri dieback and myrtle rust and associated vectors.</p> <p>Include German and paper wasp control to maintain insect diversity.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>Royal fern was considered for inclusion in the regulatory section of the RPMP though it would be more appropriately managed through the Council's biodiversity programme at key sites. It is included as an advisory pest.</p> <p>Phoenix palm has been added as an advisory pest. It is recommended that the pest be managed under Council's site-led approach to protect high value sites including programmes such as Environmental Programmes and Coast Care.</p> <p>Didymo and myrtle rust are managed through national initiatives. They were considered for inclusion however they failed to meet the criteria for inclusion as they were not cost beneficial, are available for sale, are commonly planted and are not considered highly invasive.</p> <p>When the RPMP was being developed, a National Pest Management Plan was being developed to manage kauri dieback. Despite this, at this stage no government funding has been committed for implementing this plan. Council has a role to play in supporting lead agencies to manage national pests. This is supported by our strategic direction and kauri dieback is included in the RPMP as an advisory pest. Kauri dieback has been declared by government an 'unwanted organism' and is subject to the relevant provisions under the Biosecurity Act. The majority of natural kauri in the Bay of Plenty is on Department of Conservation estate. Council staff currently do random soil testing for kauri dieback and engage with landowners who have kauri stands on their private property, encouraging them to fence off the Kauri from known vectors of spread. The landscape for managing and funding kauri dieback is changing. Some North Island regional councils are now seeking support for a regionally led programme for kauri dieback which BOPRC will be part of.</p> <p>Pigs and deer come under the Wild Animal Act and are controlled, if appropriate, through our biodiversity programmes.</p>		

## Regional Pest Management Plan Council Decisions by Section

Cost benefit analysis suggests it is cost beneficial to manage feral wasps in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest.

Council previously considered site-led rules to manage well-established pests but didn't support this approach for two main reasons:

Firstly, a number of BOPRC's core activities contribute directly to biodiversity outcomes, including pests not in the PRPMP. To protect biodiversity values, a site led approach is preferred which focuses on the biodiversity values to be protected. Rather than focusing on individual pest species, all pest threats within a high value site need to be managed. BOPRC's current biodiversity approach is voluntary and bringing in site led rules could significantly change the way staff engage with landowners on biodiversity protection.

Secondly, the National Policy Direction has quite specific requirements for site led rules which reduce the flexibility in adapting the biodiversity programme to new threats.

Council sees no reason to change the current approach which works well and maintain that site led rules do not align well with BOPRC's other work programmes but recommend the following text is added text to the RPMP to explain BOPRC's pest management activities that support its voluntary (site-led) biodiversity programme: "The Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme".

Submission Number:	51: 30	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	We appreciate the service delivery outcomes outlined for goats and would like to see a further outcome to ensure feral goats are able to be controlled by BOPRC on land under active ecological restoration by community groups who are not necessarily resourced to undertake the work themselves or able to fund a cost recovery service when goat control is required.		
Decision Sought:	Include a service delivery that enables BOPRC to undertake direct control of feral goats as and when required on land under active ecological restoration by community groups without any cost to those community groups.		
Council Decision:	Accept in Part		
Reasons:	As stated Council will maintain control and management of feral goats. Council will support the control of feral goats at priority biodiversity sites, where appropriate, through our biodiversity programme.		

Submission Number:	51: 31	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Outcomes are: <ul style="list-style-type: none"> <li>• Reduction in extent and density of these pests.</li> <li>• Areas that are clear of these pests will remain so.</li> <li>• The spread of these pests between properties will be reduced.</li> <li>• The spread of these pests throughout the region will be stopped.</li> </ul> <p>But on p 34 of the supporting document it refers merely to "containing wallabies to their current range". This is not a reduction.</p> <p>There is no detail in the Containment section as to what action the council will undertake with wallabies. There is more information in the report to the RDD p42 on 30 October 2018: "preventing further spread from the containment area by 2026." This is not an acceptable goal – the range and density of wallabies needs to be drastically reduced. The report later goes on to discuss "prevent potential increases in economic impacts over coming years by containing further potential spread." [our emphasis]. It seems that the primary driver is economic effects, not the devastating effects on indigenous biodiversity. The current commercialisation of the species is almost certainly working against the need to eradicate them from the central North Island in the long term. The plan should take precedence over any joint agency plan.</p>		
Decision Sought:	Wallabies - Clarify the Outcomes for wallabies to be a reduction in their current range and density. Include a progressive reduction target over the next 10 years of this plan. Seek a review of the joint agency plan to be consistent with this plan.		
Council Decision:	Accept in Part		

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Reasons:	Containment of wallabies is needed as a first step in reducing their range. Currently we don't have enough funding for that and will be relying on support from the crown and other supporting agencies.		
Submission Number:	52: 2	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>MPI has a leadership role for biosecurity and manages biosecurity risks offshore, at New Zealand's border and within New Zealand. This includes setting border standards for arriving vessels and goods, undertaking national high risk surveillance for high risk organisms, leading responses to new to New Zealand pest incursions, and providing leadership for pest management activities. In our pest management leadership capacity, MPI is working with regional councils to build marine pest management capability, undertake local pest elimination programmes, and ensure regional pest or pathway management plan rules are consistent with, and give effect to, the National Policy Direction for Pest Management and any other relevant national regulation.</p> <p>MPI is pleased to see that five marine pests have been included in the proposed pest management plan for the Bay of Plenty region. The Asian paddle crab (<i>Charybdis japonica</i>), the Clubbed Tunicate (<i>Styela clava</i>) and the Mediterranean fanworm (<i>Sabella spallanzanii</i>) have been included in the Progressive Containment Programme, and the Australian droplet tunicate (<i>Eudistoma elongatum</i>) and <i>Pyura</i> (<i>Pyuridae</i> – <i>Pyura praeputialis</i>) have been included in the Exclusion programme.</p> <p>Please note that the <i>Pyura</i> species referred to in the proposed plan should be <i>Pyura</i> (<i>Pyura doppelgangera</i>), which has been confirmed by taxonomists, rather than <i>Pyura praeputialis</i>, which is a different Australian species.</p> <p>We are aware of other marine pests in neighbouring regions which the Council might consider adding to the exclusion pest programme. Adding them would enable the Council to consider taking immediate action under this plan if these species should be detected in the Bay of Plenty. They include the Japanese mantis shrimp (<i>Oratosquilla oratoria</i>) and the Colonial sea squirt (<i>Didemnum vexillum</i>). MPI would be happy to discuss further the species that could be added to the exclusion pest programme.</p> <p>We note that the Bay of Plenty Regional Council already has Small Scale Management Programmes in place for both the Clubbed Tunicate (<i>Styela clava</i>) and the Mediterranean fanworm (<i>Sabella spallanzanii</i>), with the intention of eradicating these species from Tauranga Harbour and excluding them from establishing elsewhere in the Bay of Plenty.</p> <p>MPI is currently working with the Council to eradicate Mediterranean fanworm (<i>Sabella spallanzanii</i>) and the Asian paddle crab (<i>Charybdis japonica</i>), and we suggest that these species be included in the Eradication rather than Progressive Containment section of the proposed regional plan.</p>		
Decision Sought:	<p>MPI would be happy to discuss further the species that could be added to the exclusion pest programme.</p> <p>MPI is currently working with the Council to eradicate Mediterranean fanworm (<i>Sabella spallanzanii</i>) and the Asian paddle crab (<i>Charybdis japonica</i>), and we suggest that these species be included in the Eradication rather than Progressive Containment section of the proposed regional plan.</p>		
Council Decision:	Reject		
Reasons:	<p>Since notification, Asian paddlecrab has been found in Omokoroa. According to NIWA, there are no known ways of preventing the spread making Eradication an unachievable objective. Council will continue working with Tauranga Moana to try and manage Asian paddlecrab populations. This aligns best with our sustained control approach.</p> <p>It is a similar situation for Mediterranean fanworm (ie. it is not possible to achieve eradication). Cost benefit analysis results support progressive containment classification.</p> <p>Cost benefit analysis were undertaken for Japanese mantis shrimp and colonial sea squirt and both were not cost beneficial and therefore have not been included in the RPMP.</p>		
Submission Number:	52: 3	Submission Type:	Support
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>This submission has been prepared as part of the NZ Wilding Conifer Management Strategy Implementation Programme (the Programme) and the details set out in the appended table relate specifically to the Proposed Plan's provisions for the management of Wilding Conifers (wildings). Wilding conifers are a significant pest management issue facing New Zealand and MPI is working closely with Regional Councils in managing wildings. MPI commends the Council for recognising the harm caused by Wildings and supports the Council's commitment to managing wildings in its region. We look forward to working closely with the Council when we extend the current control Programme to include the Bay of Plenty Region.</p> <p>Wilding conifers are introduced conifers that have mainly established naturally as a result of natural seed spread. This process has been exacerbated by landowners failing to take action when wilding conifers first occur, and much of the ongoing wilding conifer spread in New Zealand is generated from existing</p>		



## Regional Pest Management Plan Council Decisions by Section

areas of reproducing wilding conifers. Much of the initial wilding conifer spread originated from a range of sources, particularly historic or 'legacy' plantings, such as Crown plantings for erosion control and research; long-established shelterbelts and amenity plantings on private and pastoral lease land; and in some locations, from woodlots and forest plantations.

Wilding conifers are produced by many different introduced conifer species. Ten conifer species are recognised as currently contributing most to the wilding conifer problem in New Zealand. While some of these species now have little or no commercial value and are no longer planted, or much less frequently planted than in the past, several of these species, particularly Radiata pine (*Pinus radiata*) and Douglas fir (*Pseudotsuga menziesii*), are highly valuable commercially grown species that contribute significantly to forestry exports.

Decision Sought: Retain wilding conifers and relevant provisions.

Council Decision: Comment noted

Reasons: Support noted

### Section: Those in Proposed Table 1 RPMP

Submission Number: 3: 2 Submission Type: Support in Part

Submitter: Jan Caudwell

Submission Summary: Support continued containment for woolly nightshade.

Decision Sought: Retain woolly nightshade as a progressive containment plant pest.

Council Decision: Comment noted

Reasons: Support noted

Submission Number: 20: 1 Submission Type: Not Applicable

Submitter: Andrew Fowler

Submission Summary: I have proudly worked as a Real Estate agent for 8 years for PGG Wrightson and have definitely seen the woolly nightshade problem worsen in the Northern BOP over the last couple of years.

This lessens property values and increases health issues and ultimately will lead to a collapse of the native eco systems.

I purchased a known (extreme woolly nightshade problem) farm 2 years ago and have eradicated all the mature fruiting plants. I expect to have this fully controlled this year.

NB that wild kiwifruit have also been eradicated now on the bush edge of this property. Fruiting privet and Barberry are also now eradicated.

I have worked as a contractor to EBOP eradicating woolly nightshade approx. 15 years ago and was very proud to have eradicated this plant pest on the locations I worked on.

People have always struggled with the concept of different rules regarding the same plant within the region (I'm talking about the Woolly Nightshade Exclusion Zones at Te Puna and Welcome Bay, where control of woolly nightshade is currently not enforced by the BOPRC). I believe that woolly nightshade should be treated the same throughout the Bay of Plenty region.

My submission is based on personal and professional experience.

Woolly nightshade is a highly efficient plant. It grows up to 2 meters tall within one year, and can reproduce within 6 months of germination. The leaves and roots are allelopathic, and suppress the germination of seeds of other plants. This weed should not be allowed to get out of control.

Landowners in the Bay of Plenty, north of the Wairoa river pay rates like everybody else, property prices are high, and it is generally a very popular area. There is no conceivable reason why this area should not get the same attention and funding from the BOPRC in regards to reducing pest plants, and protecting ecological and economic (tourism) values, as other areas of the Bay of Plenty. It needs to be recognized that landowners (sometimes with help of the council) have made a huge effort to get on top of woolly nightshade and wild kiwifruit. Their efforts should get the same support from the council as areas south of the Wairoa river. People should not have to make complaints about their neighbours to get this support.

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Much of the woolly nightshade grows in gullies out of sight, yet the woolly nightshade spreads from these areas onto neighbouring properties, into recovering native bush, along streams, and into protected areas. Complaints are often about a handful of woolly nightshade within sight of the complainant, while larger infestations remain untouched.

Furthermore, going out for a single complaint is not the most effective way to conquer pest plants. It is much more effective to look at an area (independent of complaints), and to encourage landowners to control the same weed around the same time (to get rid of the seed-source within the area).

I do not want to see our land like North Queensland where the dominant forest is woolly nightshade.

Decision Sought: BOPRC to actively manage Woolly nightshade throughout the Bay of Plenty

Council Decision: Accept in Part

Reasons: Where woolly nightshade has been included as a progressive containment pest, occupiers are required through rule 3 to destroy the pest. For the rest of the region, management of woolly nightshade is captured by rule 5 which requires sustained control at adjoining compliant properties. This is due to the community desire to continue investing in controlling these species.

Through recent workshops Council has opted to support funding the suppression of woolly nightshade along property boundaries and support for capability-building to assist with control on unadministered Maori land (not wide spread suppression).

Submission Number: 22: 2 Submission Type: Oppose

Submitter: Eastern Region Fish & Game Council

Submission Summary: 9. Declaring pest fish under the PRPMP when these species are sports fish under the Conservation Act 1987

Table 1 of the PRPMP declares Perch (*Perca fluviatilis*) and Tench (*Tinca tinca*) as pests.

Section 7(2) of the Biosecurity Act 1993 states: "this Act must not be construed so as to affect or derogate in any way from the provisions of ... the Conservation Act 1987".

Further, s 69(1) of the Biosecurity Act 1993 states: "To the extent to which a regulation made under this or any other Act is inconsistent with a rule, the regulation prevails. "

Section 26Q(l) of the Conservation Act 1987 states: "The functions of each Fish and Game Council shall be to manage, maintain, and enhance the sports fish and game resource in the recreational interests of anglers and hunters ..."

Sports fish are defined in the Conservation Act 1987 as: "Sports fish means every species of freshwater fish that the Governor-General may declare, by Order in Council, to be sports fish for the purposes of this Act".

Regulation 2A of the Freshwater Fisheries Regulations 1983, created by Order in Council, declares that the: "Species of fish specified in Schedule 1 to these Regulations are sportfish."

Schedule 1 of the Regulations lists perch and tench as sports fish.

Given that sports fish are to be managed in the recreational interests of anglers, their declaration as a pest (with the constraints under the PRPMP that flow on from that classification) is inconsistent with their status in the higher document.

To declare perch and tench as 'pest fish' is in conflict with the imperatives of both the Freshwater Fisheries Regulations 1983 and the overarching statute - the Conservation Act 1987. This conflict is prohibited by ss 7(2) and 69(1) of the Biosecurity Act 1993 and is therefore *ultra vires*.

Decision Sought: Fish and Game seeks the deletion of references declaring perch and tench as pest species in the PRPMP, along with any specific duties, actions and responsibilities specified for those species.

Council Decision: Accept in Part

Reasons: Council considers if sports fish exist in locations where other high value aquatic life is threatened by their numbers then Council is justified classifying these fish as a pest in a RPMP. Council does not see any issue of *ultra vires* as suggested by the Fish and Game Council submission.

However for clarification definitions for perch and tench have been added. These definitions explicitly

## Regional Pest Management Plan Council Decisions by Section

state the perch and tench BOPRC intends to manage are limited to those that are present due to a breach of Conservation Act and Fisheries Regulations.

Submission Number:	22: 3	Submission Type:	Oppose
Submitter:	Eastern Region Fish & Game Council		
Submission Summary:	<p>Prohibiting Fish and Game from releasing perch or tench</p> <p>The PRPMP at Rule 6 prohibits Fish and Game from propagating or distributing perch or tench.</p> <p>Section 69(1) of the Biosecurity Act 1993 states: To the extent to which a regulation made under this or any other Act is inconsistent with a rule, the regulation prevails. "</p> <p>The Freshwater Fisheries Regulations are promulgated under the Conservation Act 1987. Under s 69(1) of the Biosecurity Act 1993 they therefore prevail over the rules of the PRPMP. Regarding the transfer of sports fish, Regulation 62(1) of the Freshwater Fisheries Regulations 1983 provides:</p> <p>"Notwithstanding regulation 61 no person shall, without the written authority of the Director-General, transfer any sports fish or fish ova from any lake, river, or stream of any catchment and place, liberate, or introduce such sports fish or fish ova into any lake, river, or stream of any other catchment."</p> <p>This provides a prohibition on transfer of sports fish, with the ability to apply to the Director-General to be able to undertake this activity.</p> <p>Banning Fish and Game from propagating or distributing perch or tench in the PRPMP is inconsistent with the higher Freshwater Fisheries Regulations 1983 because under Regulation 62(1) sports fish can be released into any waterbody with the authorisation of the Director-General. The PRPMP attempts to prohibit this.</p>		
Decision Sought:	Fish and Game seeks the deletion of references declaring perch and tench as pest species in the PRPMP, along with any specific duties, actions and responsibilities specified for those species.		
Council Decision:	Accept in Part		
Reasons:	BOPRC is clear it does not want perch and tench in the region's freshwater waterbodies. BOPRC believes it would have a strong case in appealing the release of perch and tench due to the detrimental impact on environmental values. Our intent to oppose any release of perch and tench is signaled clearly by including them in our RPMP as pests.		

Submission Number:	27: 1	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	<p>KVH acknowledges that Council face a significant challenge to fund and prioritise management programmes for a wide range of terrestrial, freshwater aquatic and marine pests in the BOP region. KVH also accepts that priority areas for pest control are often the lightly infested areas where control work is more likely to result in sustainable gains. Council is applying this principle in declaring wild kiwifruit a Progressive Containment pest in lightly infested areas (e.g. Opotiki) and a Sustained Control pest in areas with greater density (e.g. Te Puke). Rules in the Proposed RPMP include a requirement to destroy wild kiwifruit on property boundaries, or if directed (in writing) by an authorised person (both within Rule 5).</p> <p>While KVH acknowledges that this approach may be appropriate for some pest plants, we think it will result in many western Bay of Plenty landowners attempting to avoid their responsibility to control wild kiwifruit, especially where it grows more than 200m from a property boundary. Many Te Puke properties include kilometres of bush-clad gullies. The success of the wild kiwifruit control programme in the BOP has been assisted by an effective surveillance programme and an easy to understand, unequivocal legal obligation of landowners/occupiers to destroy plants wherever they occur.</p> <p>Actual control work is usually undertaken by professional contractors which results in vines being effectively destroyed and all health and safety obligations met – wild kiwifruit often grows on very steep terrain.</p> <p>KVH/NZKGI think that the proposed policy will seriously undermine the current effective approach.</p>		
Decision Sought:	KVH/NZKGI request that wild kiwifruit be a Progressive Containment pest across the entire BOP region, and that the rule state that landowners/occupiers must destroy wild kiwifruit on their properties. Note that landowners/occupiers will still have the option of using professional contractors through the collaborative programme. We therefore request that Council remove all reference to wild kiwifruit as a Sustained		

## Regional Pest Management Plan Council Decisions by Section

	Control pest with associated boundary control rule.
Council Decision:	Accept
Reasons:	Wild Kiwifruit will be managed as a progressive containment pest across the whole region (with the financial support of KVH).
	<p>In support of their submission KVH have agreed to increase industry contribution to controlling wild kiwifruit and, in addition, support surveillance costs. Staff are currently negotiating an MOU with KVH that will support a control programme of \$333,000 per annum with Council's share being 30%.</p> <p>Under the proposed MOU industry (i.e. KVH) have agreed to take over the management of all control work contracts and payments to contractors and cost recovery from landowners. BOPRC will continue to manage surveillance and compliance work where needed. Staff will bring the MOU to Council for formal approval.</p> <p>Cost-benefit analysis does not support progressive containment; however, Council considers that it is achievable with the support of industry investment in control. Applying a progressive containment regime across the region is a simpler approach than the sub-regional split currently proposed in the RPMP.</p>
Submission Number:	27: 2
	Submission Type: Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)
Submission Summary:	<p>Woolly nightshade is well-established in many areas of the coastal BOP. KVH/NZKGI has previously alerted Council to the risk of heavily infested areas of woolly nightshade, heavily laden with ripe fruits over late spring and summer, potentially providing an ideal breeding ground for any incursion of Queensland or other fruit fly species. (Please refer to Appendix 1).</p> <p>A breeding population of Queensland fruit fly in the Te Puke area has been estimated to cost the kiwifruit industry \$460 million in the first year following their discovery. This cost is mostly due to restricted access to overseas markets. (Source: Fruit Fly: Likely impact of an incursion of fruit fly in the Bay of Plenty, Hawkes Bay or Nelson. Fruition Horticulture. February 2007).</p> <p>KVH/NZKGI request that Council puts more effort into achieving the control of woolly nightshade in especially heavily infested areas. Council should pro-actively enable collaborative, cost-sharing arrangements and community-based initiatives, including with Kaitiaki, to progress the control of woolly nightshade in the Te Puke, Tauranga and Te Puna areas.</p> <p>Council should also continue to fund research into further prospective biological control agents for woolly nightshade. KVH understand that Landcare Research have recently identified further potential biocontrol agents in woolly nightshade's native range of Brazil and Uruguay.</p>
Decision Sought:	<p>KVH/NZKGI request that Council puts more effort into achieving the control of woolly nightshade in especially heavily infested areas. Council should pro-actively enable collaborative, cost-sharing arrangements and community-based initiatives, including with Kaitiaki, to progress the control of woolly nightshade in the Te Puke, Tauranga and Te Puna areas.</p> <p>Council should also continue to fund research into further prospective biological control agents for woolly nightshade. KVH understand that Landcare Research have recently identified further potential biocontrol agents in woolly nightshade's native range of Brazil and Uruguay.</p>
Council Decision:	Reject
Reasons:	<p>Cost-benefit analysis was undertaken for woolly nightshade management based on a variety of scenarios, including progressive containment and sustained control as well as a sub-regional split between these programmes. The outcome from this analysis was not cost beneficial for all scenarios other than sub-regional progressive containment where distribution is low, and sustained control elsewhere.</p> <p>Where Woolly nightshade has been included as a progressive containment pest, occupiers are required, through Rule 3, to destroy the pest. For the rest of the region, management of woolly nightshade is captured by Rule 5 which requires sustained control at adjoining compliant properties. This is due to the community desire to continue investing in controlling this species.</p> <p>No changes to be made to the overall management regimes proposed for woolly nightshade, retaining the proposed regime of Progressive Containment in the Rotorua lakes, Rangitaiki, Tarawera and Whakatane areas and Sustained Control elsewhere in the region.</p>

## Regional Pest Management Plan

### Council Decisions by Section

Submission Number:	29: 3	Submission Type:	Support
Submitter:	Federated Farmers		
Submission Summary:	Chilean needle grass is an invasive weed that out-competes productive pasture grasses and takes over large areas if left uncontrolled. Its seeds have a sharp, needle like tip which attaches easily to stock and can penetrate skin and muscle. This can cause painful abscesses for the animal, and can lead to downgrading of pelts, meat or wool. The seed can also injure horses and dogs. It is unpalatable to stock when it is seeding (November to January), reducing the stock carrying capacity on a property. Chilean needle grass is widespread in Hawke's Bay and Marlborough, and has been found on a small number of sites in Canterbury. Currently, Chilean needle grass infests approximately 3,700 hectares of land in New Zealand, but has the potential to affect up to 15 million hectares nationwide.		
Decision Sought:	Retain Chilean needle grass as an exclusion pest		
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	29: 7	Submission Type:	Support
Submitter:	Federated Farmers		
Submission Summary:	FFNZ does not support a regulatory approach to control gorse.		
Decision Sought:	Retain as proposed		
Council Decision:	Accept in Part		
Reasons:	The RPMP does have a regulatory approach for gorse but management only required if the adjoining landowner is also managing gorse on their property.		
Submission Number:	29: 8	Submission Type:	Support in Part
Submitter:	Federated Farmers		
Submission Summary:	Our concerns in relation to goats are that goats that are farmed are not pests. Farming goats are held behind effective fences or otherwise constrained. Unlike feral goats, farming goats are not pest. We seek to ensure that the implementation of measures does not apply to any farm goats.		
Decision Sought:	Enable goat farming especially for the low risk mohair producing goats		
Council Decision:	Accept in Part		
Reasons:	Definition of feral goats added. Note other planning instruments under the RMA may have conditions on goat farming.		
Submission Number:	33: 1	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the list of pest species in Table 1, including: Alligator weed Alternanthera philoxeroides Egeria Egeria densa Elodea Elodea canadensis Hornwort Ceratophyllum demersum Lagarosiphon major Lodgepole pine Pinus contorta Old man's beard Clematis vitalba Wild ginger Hedychium gardnerianum and Hedychium flavescens Wilding conifers (excluding Lodgepole pine) Pinus spp		

## Regional Pest Management Plan Council Decisions by Section

	Woolly nightshade Solanum mauritianum		
Decision Sought:	LINZ supports the retention of Section 4 and Table 1		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	54: 12	Submission Type:	Not Applicable
Submitter:	Department of Conservation		
Submission Summary:	<p>Feral Goats - The Department encourages, and will support, the Council to expand the area where feral goats are managed as an eradication programme pest. This may also include further zonation as exclusion. The following areas could be managed for feral goat eradication or exclusion.</p> <ol style="list-style-type: none"> <li>1. An extension to the south-west of the current eradication area in the upper Waioeka River.</li> <li>2. The central area of the region between the Waiotahi River in the east and the Kaimai-Mamaku range to the west has a few isolated populations of feral goats that could be feasibly eradicated within the term of the plan (assuming resourcing is appropriate from both Council and DOC on both public and private land). Completion of objectives such as these have the likelihood of saving effort in the medium-long term and further protecting important values.</li> </ol>		
Decision Sought:	<p>The following areas could be managed for feral goat eradication or exclusion.</p> <ol style="list-style-type: none"> <li>1. An extension to the south-west of the current eradication area in the upper Waioeka River.</li> <li>2. The central area of the region between the Waiotahi River in the east and the Kaimai-Mamaku range to the west has a few isolated populations of feral goats that could be feasibly eradicated within the term of the plan (assuming resourcing is appropriate from both Council and DOC on both public and private land).</li> </ol>		
Council Decision:	Accept in Part		
Reasons:	There is uncertainty about whether eradication is achievable west of the Motu River and population distribution and size. BOPRC will work closely with DOC to assess the viability of eradication west of the Motu River and look to establish a joint programme to collaboratively address the issue.		
Submission Number:	54: 13	Submission Type:	Support in Part
Submitter:	Department of Conservation		
Submission Summary:	African Feather Grass – support progressive containment. Additional resources are needed to manage this plant and direct Council funded control is supported to ensure progress is made.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	54: 15	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	Asiatic knotweed - support progressive containment category. Support direct Council funded control as is currently occurring to ensure progress is made.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	54: 16	Submission Type:	Support in Part
Submitter:	Department of Conservation		
Submission Summary:	Boneseed – support progressive containment for coastal areas Otamarakau to Tauranga Harbour. Species is absent from most of BOP except coastal area. Suggest eradication category for remainder of the BOP region to reflect absence of species.		
Decision Sought:			
Council Decision:	Accept in Part		

## Regional Pest Management Plan Council Decisions by Section

Reasons:	Cost benefit analysis indicates progressive containment is slightly not cost-beneficial, although boneseed largely impacts the coastal environment and the high community value placed on this area is not well reflected in the cost benefit analysis model. Not widely distributed therefore can be controlled effectively with sustained investment. Eradication was not cost-beneficial therefore not considered to be the preferred option.		
Submission Number:	54: 17	Submission Type:	Oppose
Submitter:	Department of Conservation		
Submission Summary:	Climbing spindle berry – do not support progressive containment/sustained control as per Map 13. There is still very limited distribution of this plant in the Bay of Plenty and therefore the definition of eradication is more appropriate for all areas with the exception of the Rotorua lakes catchments. In this area progressive control is more appropriate as both DOC and Council are directly funding control of climbing spindle berry in parts of the catchment where there are infestations e.g. Kaharoa, Lake Rotoiti, Tarawera. The current proposed sustained category control for Rotorua would not give landowners any requirement to control this species on their properties except boundaries which would continue to undermine the direct funding of control work on adjoining blocks by DOC or Council. Additional resources are required and direct Council funded control within the proposed Rotorua progressive containment area rather than landowner control is likely to be more efficient when dealing with this species.		
Decision Sought:			
Council Decision:	Reject		
Reasons:	Cost benefit analysis indicates progressive containment and sustained control programmes are cost beneficial. Outside of Rotorua area there is a low incidence of the pest and it is highly visible at times during the year.		
Submission Number:	54: 18	Submission Type:	Support in Part
Submitter:	Department of Conservation		
Submission Summary:	Climbing spindle berry – do not support progressive containment/sustained control as per Map 13. There is still very limited distribution of this plant in the Bay of Plenty and therefore the definition of eradication is more appropriate for all areas with the exception of the Rotorua lakes catchments. In this area progressive control is more appropriate as both DOC and Council are directly funding control of climbing spindle berry in parts of the catchment where there are infestations e.g. Kaharoa, Lake Rotoiti, Tarawera. The current proposed sustained category control for Rotorua would not give landowners any requirement to control this species on their properties except boundaries which would continue to undermine the direct funding of control work on adjoining blocks by DOC or Council. Additional resources are required and direct Council funded control within the proposed Rotorua progressive containment area rather than landowner control is likely to be more efficient when dealing with this species.		
Decision Sought:			
Council Decision:	Reject		
Reasons:	Cost benefit analysis indicates progressive containment and sustained control programmes are cost beneficial. Outside of Rotorua area there is a low incidence of the pest and it is highly visible at times during the year.		
Submission Number:	54: 20	Submission Type:	Support in Part
Submitter:	Department of Conservation		
Submission Summary:	Lantana- support eradication category for the Rotorua Lakes as definitely feasible. Support sustained control for Tauranga as per Map 10 pg. 92. Map 10 shows large areas of BOP as progressive containment for lantana. Apart from a localised infestation in Rotorua this species is generally absent in inland BOP. On this basis it would be feasible to extend the eradication boundary for this species to include inland BOP. A possible boundary could be from the Rotorua lakes catchments boundary thru SH 30, 34 to Kawerau following property boundaries on the edge of the Matahina Forest to the boundary of Te Urewera, through to the boundary of public conservation land at the Waioeka Conservation Area and Scenic Reserve, Urutawa Conservation Area and then following the northern edge of Nga Whenua Rahui Kawenata and Raukumara Conservation Park to the BOP region boundary in the east. This boundary which follows property boundaries can be legally defined and reflects both the current distribution of the species but also recognising this is an ecological weed and the need to prevent establishment in areas of high conservation value. Status of coastal areas should remain as per map 10.		
Decision Sought:	A possible boundary could be from the Rotorua lakes catchments boundary thru SH 30, 34 to Kawerau following property boundaries on the edge of the Matahina Forest to the boundary of Te Urewera, through to the boundary of public conservation land at the Waioeka Conservation Area and Scenic		

## Regional Pest Management Plan Council Decisions by Section

Reserve, Urutawa Conservation Area and then following the northern edge of Nga Whenua Rahui Kawenata and Raukumara Conservation Park to the BOP region boundary in the east. This boundary which follows property boundaries can be legally defined and reflects both the current distribution of the species but also recognising this is an ecological weed and the need to prevent establishment in areas of high conservation value. Status of coastal areas should remain as per map 10.

Council Decision: Accept in Part

Reasons: No changes proposed to extent of eradication area. Support noted for programmes. Cost benefit analysis indicates positive cost benefit for proposed management programmes.

Submission Number: 54: 21 Submission Type: Support

Submitter: Department of Conservation

Submission Summary: Lodgepole pine- support progressive containment and increased resources and rules relating to wilding conifers. Direct Council funding will be required to support landowners and it is recommended that there is better co-ordination and consistent rules between agencies in the Rangitaiki catchment, led by the 3 regional Councils in the area.

Decision Sought:

Council Decision: Accept

Reasons: In response to these submissions, changes have been recommended to include the Ministry of Primary Industries definition of wilding conifers along with amendments to Rule 3 and 5 to specify individual species covered by each rule.

While MPI requested all listed wilding conifer species be added to the progressive containment programme, only Scots pine (entire region), Dwarf mountain pine (entire region), Mountain pine (entire region), European larch (entire region) will be added. These additional four species have little commercial value making the ongoing seed source from production forestry manageable. Therefore progressive containment for these species is achievable. Rule 3 requires occupiers to destroy these pests unless they are party to a progressive containment Pest Management Agreement.

The other wilding conifer species still have commercial value, and there are still many unknowns in terms of their actual distribution (both in a productive and wilding sense) hence the reluctance to include them without any commitment of central government funding for ongoing control. For this reason these remaining species remain in the sustained control programme. Rule 5 requires occupiers to destroy these species within 200 metres of their boundary if the adjoining occupier is also destroying those species.

The cost of adding the four additional species (listed above) to the progressive containment programme would be minimal as these species are not yet well established.

Submission Number: 54: 22 Submission Type: Oppose



## Regional Pest Management Plan Council Decisions by Section

Submitter:	Department of Conservation		
Submission Summary:	<p>Old Man's Beard (OMB) - do not support progressive containment/sustained control as per Map 14. There is still very limited distribution of this plant in the Bay of Plenty and therefore the definition of eradication is more appropriate for all areas with the exception of the Tarawera area. In this area progressive control is more appropriate as both DOC and Council are directly funding control of this species. The proposed sustained control category would not give landowners any requirement to control OMB on their properties except boundaries which would continue to undermine the direct funding of control work on adjoining blocks by DOC or Council which has been the biggest issue for the Department for last 15 + years. A progressive control category would enable this to occur. In reality the Rotorua control boundary could be more realistically refined to the catchments of Blue Lake, Okareka and Tarawera with the remainder of the BOP eradication category. Direct Council funding would be a more efficient method of dealing with isolated infestations in the Tarawera progressive control area and probably reflects the current practice on the ground anyway in the next 10 years. Note on pg. 55 there is a mistake as it states species will be an exclusion plant pest in the remainder of region but Map 14 shows progressive.</p>		
Decision Sought:	<p>There is still very limited distribution of this plant in the Bay of Plenty and therefore the definition of eradication is more appropriate for all areas with the exception of the Tarawera area. In this area progressive control is more appropriate as both DOC and Council are directly funding control of this species. The proposed sustained control category would not give landowners any requirement to control OMB on their properties except boundaries which would continue to undermine the direct funding of control work on adjoining blocks by DOC or Council which has been the biggest issue for the Department for last 15 + years. A progressive control category would enable this to occur. In reality the Rotorua control boundary could be more realistically refined to the catchments of Blue Lake, Okareka and Tarawera with the remainder of the BOP eradication category. Direct Council funding would be a more efficient method of dealing with isolated infestations in the Tarawera progressive control area and probably reflects the current practice on the ground anyway in the next 10 years. Note on pg. 55 there is a mistake as it states species will be an exclusion plant pest in the remainder of region but Map 14 shows progressive.</p>		
Council Decision:	Reject		
Reasons:	<p>No change recommended. Cost benefit analysis confirms positive cost benefit for proposed management programmes. There is a long history of management of this pest with good progress being made. Eradication is not considered achievable.</p>		
Submission Number:	54: 23	Submission Type:	Oppose
Submitter:	Department of Conservation		
Submission Summary:	<p>Wild ginger- do not support sustained control for BOP. Recommend progressive containment category throughout the Western BOP and Rotorua lakes catchments and eastern BOP. Using a boundary line from the Rotorua lakes catchments as described for lantana above through to the BOP region boundary in the east, with progressive control to the north and eradication to the south of that line, would more accurately reflect the current distribution and Council/DOC control effort being put into this species. South of the proposed line described above, wild ginger is probably absent or at least in extremely small and isolated populations where eradication is entirely feasible and very cost effective given the potential threat to biodiversity values. To the north of this line populations are more locally common but still absent or low density in many areas. DOC has an active direct control programme for wild ginger across public conservation land in the BOP and Council also has extensive programmes in the eastern BOP and Rotorua lakes catchments as well as elsewhere. This fits better within a progressive control category to reflect the funding and effort and also to ensure landowners take some responsibility for control. A sustained control programme as proposed across the BOP would lead to essentially boundary control at best which would compromise and possibly lead to reduced funding for wild ginger control by both lead agencies. The result is that ginger would continue to spread within coastal areas and further inland into areas where it is currently absent and have even more serious impacts on biodiversity values which it currently threatens.</p>		
Decision Sought:	<p>Recommend progressive containment category throughout the Western BOP and Rotorua lakes catchments and eastern BOP. Using a boundary line from the Rotorua lakes catchments as described for lantana above through to the BOP region boundary in the east, with progressive control to the north and eradication to the south of that line, would more accurately reflect the current distribution and Council/DOC control effort being put into this species.</p>		
Council Decision:	Reject		
Reasons:	<p>No change recommended. Cost benefit analysis determines sustained control across the region is slightly more cost beneficial than progressive containment and sustained control split. Sustained control is the preferred management programme due to the wide distribution of the pest.</p>		
Submission Number:	54: 24	Submission Type:	Support

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## Regional Pest Management Plan Council Decisions by Section

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Submitter:	Department of Conservation
Submission Summary:	Wild kiwifruit – support progressive containment and sustained control category as per Map 11 status with industry funding.
Decision Sought:	
Council Decision:	Comment noted
Reasons:	Support noted

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Submission Number:	54: 25	Submission Type:	Seek Amendment
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Submitter:	Department of Conservation
Submission Summary:	Woolly nightshade -proposed map 12 does not reflect the distribution of the species being largely absent in the southern part of the BOP, eastern BOP hinterland and Rotorua District. Therefore we suggest a boundary of eradication south of the line (including Rotorua lakes catchments) as proposed for lantana above, and sustained control north of this line.
Decision Sought:	We suggest a boundary of eradication south of the line (including Rotorua lakes catchments) as proposed for lantana above, and sustained control north of this line.
Council Decision:	Reject
Reasons:	Cost-benefit analysis was undertaken for woolly nightshade management based on a variety of scenarios, including Progressive Containment and Sustained Control as well as a sub-regional split between these programmes. The outcome from this analysis was not cost beneficial for all scenarios

## Regional Pest Management Plan Council Decisions by Section

other than sub-regional Progressive Containment where distribution is low, and sustained control elsewhere. Council will consider this input through the Operational Plan when targeting resources.

Submission Number:	54: 26	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Yellow flag iris -support progressive control for Rotorua lakes catchments but must continue to be service delivery funded. DOC will continue to support this programme. This species is absent from most of the remainder of the BOP so the eradication category for the rest of the BOP may be feasible.		
Decision Sought:	This species is absent from most of the remainder of the BOP so the eradication category for the rest of the BOP may be feasible.		
Council Decision:	Accept in Part		
Reasons:	<p>Support noted for progressive containment. No change to include eradication areas as suggested.</p> <p>Cost benefit analysis determined that progressive containment is more cost-beneficial than eradication. This approach aligns with the current management regime for the pest which Council considers works well for the species. If progressive containment is achieved over the term of plan then eradication could be considered in the future.</p>		

### Section: General

Submission Number:	8: 2	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Pampas is a serious, invasive and exclusive pest plant, however it has recently become evident that it also poses an economic cost to the kiwifruit industry. It flowers in late summer and early autumn, just as kiwifruit are maturing and the fluff from the seedheads attaches itself to the kiwifruit. I am advised that at least one shipment of kiwifruit was returned from Australia, due to it being contaminated with pampas fluff. Currently I understand that fluff has to be cleaned off individual kiwifruit at a significant cost to the industry.		
Decision Sought:	Pampas Grass to be included in a Pest category.		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis has determined that management under most scenarios were not cost beneficial. Pampas is common around the region so would have a high cost to manage. The greatest benefit results from managing pampas as a non-RPMP pest (now named advisory pest in Appendix 1). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		

### Section: Requests for new pests

Submission Number:	8: 4	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	Include feral cat, possum, Norway rat, and mustelids in a pest category. It is not tenable, that with the Government supporting PF 2050, BORC is not categorising these species as significant pests whose control/eradication is crucial to the environmental and economic wellbeing of the country.		
Decision Sought:	Include feral cat, possum, Norway rat, and mustelids in a pest category.		
Council Decision:	Reject		
Reasons:	<p>Feral cat - Cost benefit analysis (CBA) suggests it is cost-beneficial to manage feral cats in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest and its ability to impact on the region. Possums – CBA indicates strongly that it is not cost beneficial to manage possums due to the widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that possums be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		

## Regional Pest Management Plan Council Decisions by Section

Norway Rat - CBA indicates strongly it is not cost beneficial to manage Norway rats due to the widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that Norway rats be managed under site-led programmes such as Environmental Programmes and Coast Care.

Ferrets and Weasels - CBA indicates strongly it is not cost beneficial to manage ferrets and weasels due to the widespread distribution and the associated cost of implementing the programme at the broad scale required. It is recommended that these pests be managed under site-led programmes such as Environmental Programmes and Coast Care.

Stoats - CBA suggests it is cost-beneficial to manage stoats in the RPMP, however the cost of implementing the programme is extremely high and beyond the current resourcing of the programme. In addition, managing the pest is likely to have minimal impact on the pest and its ability to impact on the region.

Feral cats, rats, mustelids and possums are included in Appendix 1 (Advisory pests). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.

Submission Number:	9: 1	Submission Type:	Seek Amendment
Submitter:	David Anderson-Smith		
Submission Summary:	Include Taiwan Cherry as an eradication pest. It's everywhere. In the last 4 years I have seen it take over roadsides, native bush, across the road from my house it has taken over what used to be a hillside of pongas and King ferns. If you leave it another 10 years, it will be too late. It should be controlled on all public land at the very least.		
Decision Sought:	Include Taiwan Cherry as an eradication pest		
Council Decision:	Reject		
Reasons:	<p>Taiwanese cherry – Cost benefit analysis determined that inclusion of Taiwanese Cherry in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Taiwanese Cherry be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>Taiwanese cherry is included in Appendix 1 (Advisory pests).</p>		
Submission Number:	11: 7	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	Agapanthus and coastal banksia are outcompeting native coastal plants.		
Decision Sought:	Consider Agapanthus and coastal banksia for inclusion to protect coastal environment		
Council Decision:	Accept in Part		
Reasons:	<p>Although the cost benefit analysis did not support agapanthas and coastal banksia for inclusion in the RPMP, Council agrees that they should be included in Appendix 1 as Advisory pests.</p>		
Submission Number:	11: 11	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	Taiwanese cherry is spreading and becoming very dominant in native bush areas.		
Decision Sought:	Reassess Taiwanese cherry and consider for inclusion.		
Council Decision:	Reject		
Reasons:	<p>Cost benefit analysis has determined that inclusion of Taiwanese Cherry in the RPMP management programmes is not cost-beneficial.</p> <p>It is recommended that Taiwanese Cherry be managed under Council's site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	27: 3	Submission Type:	Seek Amendment
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Pampas, a native of South America, is also well-established in the coastal BOP. There has been a significant spike in the amount of pampas seed detected on kiwifruit at BOP packhouses. Pampas flowers in late February/March, just prior to kiwifruit harvest; the wind-blown seed is a significant reject factor of kiwifruit and if detected will prevent access to some markets. Pampas seed "finds" in packhouses have increased from 50 in 2016, to 543 in 2018. Identification of the seeds alone has cost \$46,000. The potential cost of market restrictions and returning or redirecting shipments of fruit is significant.		
Decision Sought:	KVH/NZKGI request that Council ensures pampas is controlled in road and rail transport corridors. KVH/NZKGI recognise that eradication or progressive containment for a well-established pest is unlikely to be feasible, however, we request a more pro-active approach to especially ensure that kiwifruit en route to the packhouse is not trucked through corridors of flowering pampas; or that orchards bounding a road or rail line are not contaminated by pampas.  The control of pampas could be agreed with road and rail authorities through MOUs with Council. KVH can assist and participate in this process. Council also needs to provide further funding to ensure continued research into potential biocontrol agents of the two pampas species established in the BOP.		
Council Decision:	Accept in Part		
Reasons:	Council and NZTA do have an MOU. The management of pampas could be a matter raised in annual discussions regarding pest management priorities and commitments between BOPRC and NZTA.  Including wild kiwifruit as a progressive containment pest means all non crown agencies (including crown entities such as KiwiRail) will be bound by Rule 3 which requires occupiers to remove the pest from the property they manage.		
Submission Number:	27: 4	Submission Type:	Seek Amendment
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Moth plant is a poisonous vine and very invasive through the dispersal of wind-blown seeds over autumn and winter months. Moth plant can heavily infest orchard shelter belts and slow down or prevent mechanical trimming. KVH has undertaken regular awareness within the kiwifruit industry to ensure that moth plant is destroyed within kiwifruit orchard shelter belts. Very good progress has been achieved in reducing populations of moth plant in BOP kiwifruit orchards. However, the vine continues to grow uncontrolled in many coastal unmanaged areas.		
Decision Sought:	KVH/NZKGI request that Council require the control of moth plant in transport corridors and biodiversity protection areas; and continue to provide funding toward research for the biocontrol of moth plant.		
Council Decision:	Reject		
Reasons:	CBA has determined that inclusion of moth plant in the RPMP management programmes is not cost-beneficial.  It is recommended that moth plant be managed under Council's site-led approach to manage high value sites including programmes such as Environmental Programmes and Coast Care.  Moth plant has been added as an advisory pest in Appendix 1 of the RPMP in recognition of the significance of the pest in the region.		
Submission Number:	28: 20	Submission Type:	Seek Amendment
Submitter:	Nautilus Contracting		
Submission Summary:	A small list of plant pests that present a very high ecological and natural character threat, and which are currently in the Restricted Pest list of the Operative RPMP, are now relegated to Non-RPMP pests in Appendix 1. Those species are listed following, and their characteristics are briefly detailed to give an appreciation of the cumulative consequence of underrating their impact upon the Bay of Plenty's natural environment.  Climbing asparagus Appendix 1 of the RPMP gives a reasonable description of this plant's characteristics; however, it's worth adding that this pest thrives in a wide range of light and moisture conditions where it forms a dense spider-web effect from ground level to approx. 4m aboveground, transforming the forest ecology and making travel through native forest very difficult.		

## Regional Pest Management Plan Council Decisions by Section

Jasmine Appendix 1 of the RPMP correctly describes this forest smothering vine which establishes both vegetatively and by seed dispersal then grows rapidly over the forest floor to the understorey and canopy.

Mignonette Vine - This serious vine tolerates a wide range of conditions and smothers all plants over which it climbs to high canopy; left unchecked it will spread to cover vast areas of forest floor and canopy. Fortunately, mignonette is still limited to a relatively small number of sites in the Bay of Plenty. WBOPDC is aware of six sites in the western Bay of Plenty (includes Tauranga city), so its' total eradication should be a priority before it spreads further.

Moth Plant - Appendix 1 correctly describes this rampant canopy covering vine which disperses by producing masses of wind-borne seeds. Fortunately, moth-plant will not germinate in heavy shade such as inside dense forest.

Taiwan Cherry grows to a tall tree (around 18m high) similar in size to mature rewarewa. It readily germinates in the full range of upper North Island environmental conditions from full sun to heavy shade, and from quite wet to very dry soils, and then rapidly grows to maturity. Even in tall forest it will become a long-lived canopy tree, seeding prolifically to eventually transform the forest.

Importantly, the cumulative effect of these five pest plants is that, left unchecked they would progressively dominate and completely transform our tracts of our regenerating forests and riparian margins, along with their ecological, cultural and natural character values; especially, when stacked up alongside other recognised pest plants .

**Decision Sought:** These five species should be included within Table 1 of the RPMP, rather than in Appendix 1. I understand that the Biosecurity Act s.70(2)(c)(vii) requires a cost/benefit analysis, but I also submit that, per s.71(e) of the Act, the medium-term costs of inaction will outweigh the cost of including these as RPMP pests.

I further submit that Mignonette Vine should be listed as a Progressive Containment Programme Pest within Table 6, being subject to Rule 3 of the RPMP, and the other four above- named species should be listed as Sustained Control Programme Pests within Table 9, being subject to Rule 5 of the RPMP.

**Council Decision:** Accept in Part

**Reasons:** Climbing asparagus has been included as sustained control pest. The cost benefit analysis (CBA) results for progressive containment are slightly more positive, however Council's assessment is that progressive containment is not achievable.

Jasmine, Mignonette vine, Moth Plant and Taiwanese cherry – CBA has determined that inclusion of these species in the RPMP management programmes is not cost-beneficial. It is recommended that these pests be managed under Council's site-led approach to protect high value sites through programmes such as Environmental Programmes and Coast Care. These species are included as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.

<b>Submission Number:</b>	29: 6	<b>Submission Type:</b>	Oppose
<b>Submitter:</b>	Federated Farmers		
<b>Submission Summary:</b>	Velvetleaf is a new incursion into much of New Zealand and FFNZ support the inclusion as an eradication pest that is funded for control and monitoring by Council. A successful eradication now would reduce future ongoing control costs for farms all across the region for one of the worst agricultural cropping pest plant species.		
<b>Decision Sought:</b>	Include Velvetleaf as an eradication pest		
<b>Council Decision:</b>	Reject		
<b>Reasons:</b>	Velvetleaf is to be managed under a national programme led by the Ministry for Primary Industries.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	29: 9	Submission Type:	Oppose
Submitter:	Federated Farmers		
Submission Summary:			
Decision Sought:	Include Kauri dieback disease ( <i>Phytophthora agathidicida</i> ) as an exclusion pest		
Council Decision:	Reject		
Reasons:	<p>When the RPMP was being developed, a National Pest Management Plan was being developed to manage kauri dieback. Despite this, at this stage no government funding has been committed for implementing this plan.</p> <p>Council has a role to play in supporting lead agencies to manage national pests. This is supported by our strategic direction and kauri dieback is included in the RPMP as an advisory pest. Kauri dieback has been declared by government an 'unwanted organism' and is subject to the relevant provisions under the Biosecurity Act.</p> <p>The majority of natural kauri in the Bay of Plenty is on Department of Conservation estate. Council staff currently do random soil testing for kauri dieback and engage with landowners who have kauri stands on their private property, encouraging them to fence off the Kauri from known vectors of spread.</p> <p>The landscape for managing and funding kauri dieback is changing. Some North Island regional councils are now seeking support for a regionally led programme for kauri dieback which BOPRC will be part of.</p>		
Submission Number:	31: 13	Submission Type:	Support in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>We submit that it's not preferable for any significant pest plants to be excluded from active management or control within the RPMP.</p> <p>However, if several significant pest plants are to remain excluded from active management or control within the RPMP, then as an alternative we submit that other management tools can and should be included in the RPMP; these include:</p> <ul style="list-style-type: none"> <li>(i) "protecting values in places";</li> <li>(ii) exacerbator neighbour controls alongside those "places", and</li> <li>(iii) targeted financial or practical assistance in the management of pests in those places.</li> </ul> <p>Such places should include: esplanade (WBOPDC has over 200kms of esplanade reserves which help protect ecological values) and scenic reserves, protected ecological features on private land and other ecological sites where landowners are actively managing pest plants.</p> <p>Also, it should ban propagation, sale and distribution of all pests included in all parts of the RPMP, not only those presently listed in Table 1 of the proposed RPMP, but also including those in the appendix.</p>		
Decision Sought:	Amend the relevant parts of the RPMP to allow for management tools for non RPMP pests.		
Council Decision:	Reject		
Reasons:	The management tools suggested in this submission sit within the pest management strategic direction. Site-led management, financial support and written direction to act will be managed on a case by case basis. Sections 52 and 53 of the Biosecurity Act 1993 manage unwanted organisms regardless of whether they are included in this RPMP.		
Submission Number:	31: 26	Submission Type:	Seek Amendment
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	WBOPDC takes a firm stance on the reduction in priority of any pests, compare to the current operative plan. We are disappointed to see sydney golden wattle move to a non-RPMP pest in the proposed RPMP. Sydney golden wattle's ( <i>Acacia longifolia</i> ) environmental impact is recognised in Appendix 1 and is one of the few species not included in the body of the proposed RPMP to have had a light CBA undertaken on it. We do not agree that it should become a non-RPMP pest. We have seen an increase of incursion in the roading network, and are actively working to control its spread. The reduction in priority given to this species through the proposed RPMP will undo this work and will see the species spread unchecked in a much more aggressive manner. This is of particular concern given how well established it may		

## Regional Pest Management Plan Council Decisions by Section

	become in a short period of time.		
	We urge BOPRC to include it in the Sustained Control Programme.		
Decision Sought:	That sydney golden wattle be listed as Sustained Control Programme Pests within Table 9. (see Submission 31.25)		
Council Decision:	Reject		
Reasons:	See previous submission point		
Submission Number:	54: 27	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:			
Decision Sought:	Chilean rhubarb – recommend progressive containment category for this species as it is a major environmental weed in other regions. There are few localised wild populations present in the Bay of Plenty and it should be prevented from becoming widespread in the wild.		
Council Decision:	Reject		
Reasons:	No change recommended. Chilean Rhubarb is included in the RPMP as an Advisory pests. Cost benefit analysis has determined that inclusion of Chilean rhubarb in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.		
Submission Number:	54: 29	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Rhododendron ponticum - this pest plant is only known to have been present at two sites near Rotorua. It has the potential to spread from cultivation, especially in the colder southern part of the region and on this basis should be considered for at least the progressive containment if not eradication category.		
Decision Sought:	Consider as progressive containment or eradication pest		
Council Decision:	Reject		
Reasons:	No change recommended.  Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.		
Submission Number:	54: 30	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Banana passionfruit – this plant is a major threat and is more common in coastal areas around the region. With the exception of a few infestations in the Rotorua lakes catchments it is absent from inland BOP and follows a similar distribution to ginger. It is recommended therefore that this plant be classified as recommended for wild ginger with the progressive containment pest category north of the same boundary line and eradication south of this. It is recommended that this approach also includes blue morning glory as both these plant pests are climbers that smother forest canopy, strangle host stems and prevent the establishment of native plant seedlings.		
Decision Sought:	It is recommended therefore that this plant be classified as recommended for wild ginger with the progressive containment pest category north of the same boundary line and eradication south of this. It is recommended that this approach also includes blue morning glory as both these plant pests are climbers that smother forest canopy, strangle host stems and prevent the establishment of native plant seedlings.		
Council Decision:	Reject		
Reasons:	No change recommended.  Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial for all scenarios other than as a non-RPMP pest. The pest is considered to have a reasonably low impact. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.		



## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 32	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Cathedral bells – it is strongly recommended that Cathedral bells be in the progressive containment category north of the boundary line as per wild ginger and eradication to the south of that line. There are a limited number of sites in the Bay of Plenty region and these are all controllable. Cathedral bells are absent from most of the Bay of Plenty and it is a climber that smothers all plants up into the canopy, preventing the establishment of native plant seedlings. Direct Council funding could see this species eradicated or significantly reduced for very low costs compared to other species listed in the RPMP.		
Decision Sought:	It is strongly recommended that Cathedral bells be in the progressive containment category north of the boundary line as per wild ginger and eradication to the south of that line.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that the most positive cost benefit results from managing it as an advisory pest.</p>		
Submission Number:	54: 33	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Firethorn – recommended for progressive containment pest category. This plant still has a limited distribution, so control efforts should focus on preventing it becoming a more wide-spread weed. Firethorn forms dense thickets in forests, coastal areas and shrublands, preventing native plants from establishing. This species has localised infestation from Rotorua southwards in colder climates.		
Decision Sought:	Firethorn – recommended for progressive containment pest category.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		
Submission Number:	54: 34	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Heather- recommended that this be moved to the progressive containment pest category. Heather is largely absent north of Rotorua and not widespread in the Bay of Plenty with a few very localised infestations south of Rotorua none of which are extensive. It is spreading north from the Taupo District along roads and with machinery and vehicles and the Department is sufficiently concerned with this spread that it has been actively controlling most populations in the Rotorua District. This plant is a major threat to wetland and forest margins as well as frost flats as it forms thick cover growing at a faster rate than native plants in these same areas. Both frost flats and wetlands are recognised as rare and threatened ecosystems in the Bay of Plenty and this species will have major impacts on these ecosystems in the future as it has done in Tongariro where widespread control actions were not initiated when the species was still in its establishment phase.		
Decision Sought:	Heather- recommended that this be moved to the progressive containment pest category.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 35	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Mignonette vine - recommend sustained control category north of boundary line recommended for wild ginger and exclusion south of that line. This species is believed to be absent in the southern part of the BOP so eradication or exclusion is entirely feasible and cost effective. Only one population in the Rotorua lakes catchments is known and being controlled on public conservation land. As well as preventing native seedlings establishing this vine smothers all plants up to the med-high canopy level in native forest and the weight of the vines combined with the aerial tubers can fell small trees. This plant is a threat to forests, coastal areas, waterways and gullies.		
Decision Sought:	Mignonette vine - recommend sustained control category north of boundary line recommended for wild ginger and exclusion south of that line.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		
Submission Number:	54: 36	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Mile-a-minute – recommend progressive containment category north of the boundary line recommended for wild ginger and exclusion south of that line. This species is believed to be absent in the southern part of BOP, so exclusion is feasible. This species occurs at a limited number of sites in the Bay of Plenty coastal region and the Department's view is that these are all controllable, therefore this species should be considered in the RPMP. This plant has the potential to become a major environmental weed in the region. Mile-a-minute can invade forest margins, coastal dunes and cliffs, shrublands and rocky areas. It smothers and kills most plants from ground level to the medium canopy height while also fixing nitrogen to the detriment of specialised native plants (e.g. orchids and ferns).		
Decision Sought:	Mile-a-minute – recommend progressive containment category north of the boundary line recommended for wild ginger and exclusion south of that line.		
Council Decision:	Reject		
Reasons:	<p>No Change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under Council's site-led approach to protect high value sites.</p>		
Submission Number:	54: 37	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Chocolate vine – recommend progressive containment category north of the boundary line recommended for wild ginger and exclusion south of that line. This species is believed to be absent in the southern part of the BOP making exclusion feasible. There are a limited number of sites in the Bay of Plenty coastal region and the Department's view is that these are all controllable therefore this species should be considered in the RPMP. This plant has the potential to become a major environmental weed in the region. Chocolate vine can invade forest margins, coastal dunes and cliffs, shrublands and rocky areas. It smothers and kills most plants from ground level to the medium canopy height.		
Decision Sought:	Chocolate vine – recommend progressive containment category north of the boundary line recommended for wild ginger and exclusion south of that line		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 38	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Mist flower- recommended for progressive containment category north of Tauranga Harbour and exclusion south of there for the remainder of the BOP. There are few sites around the Bay of Plenty region and there are effective control techniques, mainly involving biological control. Mistflower invades any site that is damp and grows very densely, preventing native seedling regeneration and also causing blockages in waterways and slips on steep sites.		
Decision Sought:	Mist flower- recommended for progressive containment category north of Tauranga Harbour and exclusion south of there for the remainder of the BOP.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion in the RPMP management programmes is negatively cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		
Submission Number:	54: 39	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Monkey apple – recommend the sustained control category north of the boundary line recommended for wild ginger and eradication south of that line for the remainder of the BOP. This weed is starting to establish in some parts of the Bay of Plenty. It is still absent from most of the southern Bay of Plenty and therefore eradication is recommended. This is a major weed in other parts of the North Island and there are some naturalised sites in the Bay of Plenty which should be contained as this has the potential to spread (bird dispersed) and have a similar impact to tree privet.		
Decision Sought:	Monkey apple – recommend the sustained control category north of the boundary line recommended for wild ginger and eradication south of that line for the remainder of the BOP.		
Council Decision:	Reject		
Reasons:	No change recommended. Cost benefit analysis has determined that inclusion in the RPMP management programmes is negatively cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.		
Submission Number:	54: 40	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Pampas – recommend site led control only through biodiversity programmes north of the boundary line of SH 38 to Te Urewera, north following the remainder of the line recommended for wild ginger. Recommend progressive containment category for Rotorua lakes catchments. Recommend eradication south of that line for the remainder of the BOP where both species are largely absent. Both species are increasing in the southern part of the Bay of Plenty, in particular around Rotorua lakes where the Department has active control programmes. It appears that populations are likely to exponentially increase in southern areas within the next decade if current individual infestations are not proactively controlled. A site led type approach is appropriate for coastal BOP where pampas is common but a more proactive containment approach is required in the remainder of the BOP while population densities remain localised. The impacts of pampas on forest margins and light gaps, coastal dunes, cliffs, islands, riverbeds, estuaries and saltmarsh, geothermal areas and to the forest industry are well documented and it is known to form dense stands and replace native groundcovers, shrubs and ferns and creating a fire hazard.		
Decision Sought:	Pampas – recommend site led control only through biodiversity programmes north of the boundary line of SH 38 to Te Urewera, north following the remainder of the line recommended for wild ginger. Recommend progressive containment category for Rotorua lakes catchments. Recommend eradication south of that line for the remainder of the BOP where both species are largely absent.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that management under most scenarios were not cost beneficial. Pampas is common around the region so would have a high cost to manage. It is recommended pampas remains in the RPMP as an advisory pest.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 41	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Privet (tree and Chinese)– for both tree and Chinese privet species the Department recommends a site led/progressive control/ eradication category as per pampas above. Tree and Chinese privet are local around Rotorua and uncommon or absent south of Rotorua/Murupara/Kaingaroa/Te Urewera. Both species are common in coastal BOP and should only be controlled here on a site led basis. It is recommended that resources are invested in containing privet and zero-density control on a sub-regional level (southern part of region) rather than on controlling plants in urban areas around Tauranga. Both privet species form dense stands in native forest shrub layers, displacing native species.		
Decision Sought:	Privet (tree and Chinese)– for both tree and Chinese privet species the Department recommends a site led/progressive control/ eradication category as per pampas above.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis suggests managing privet in the RPMP is not cost-beneficial. The cost of implementing a programme is extremely high and beyond the current resourcing of the programme and its ability to impact the region.</p>		
Submission Number:	54: 42	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Smilax - recommend site led control category north of the boundary line recommended for wild ginger and eradication south of that line. While it is common in some coastal areas it is only localised or absent in the southern part of the region, so it is recommended that eradication or exclusion is feasible. Smilax forms dense patches and smothers low growing native plants and seedlings. It can eliminate vulnerable native coastal species.		
Decision Sought:	Smilax - recommend site led control category north of the boundary line recommended for wild ginger and eradication south of that line.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis indicates inclusion has a positive cost-benefit, however Council's assessment considers boundary control rule would have little impact on the pest. It is recommended that the pest be managed under site-led programmes such as environmental programmes and coast care.</p>		
Submission Number:	54: 43	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Cape ivy - recommend the site led control category north of the boundary line recommended for wild ginger and eradication south of that line where the species is believed to be absent or very localised. Cape ivy smothers ground and low-growing plants, forming dense long-lived mats that prevent native plant establishment.		
Decision Sought:	Cape ivy - recommend the site led control category north of the boundary line recommended for wild ginger and eradication south of that line where the species is believed to be absent or very localised.		
Council Decision:	Reject		
Reasons:	<p>No change recommended.</p> <p>Cost benefit analysis has determined that inclusion of cape ivy in the RPMP management programmes is not cost-beneficial. It is recommended that the pest be managed under site-led programmes such as Environmental Programmes and Coast Care.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 44	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Wild Tamarillo and Avocado – these two species are becoming significant plant pests from discarded fruit in areas where orchards are present. It is recommended that consideration should be given to looking at industry funded control options for these species as well in areas such as Te Puke under a progressive containment category based on the industry funded control model of kiwifruit.		
Decision Sought:	It is recommended that consideration should be given to looking at industry funded control options for these species as well in areas such as Te Puke under a progressive containment category based on the industry funded control model of kiwifruit.		
Council Decision:	Reject		
Reasons:	No change recommended.  Neither Wild Avocado nor Wild Tamarillo were considered as they are not considered highly invasive.		

Submission Number:	54: 45	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	Wilding conifers- pg. 69 are listed as Pinus spp. This is incorrect as the definition on pg. 101 includes Psuedostuga and Larix. Definitions of wilding conifer species are included on pg. 101 based on the National Wilding Conifer Strategy. It should be noted that three species Pinus sylvestris, Pinus mugo and Pinus uncinata are not known to be present as wildings in the BOP. In addition Pinus strobus and Pinus patula which are not listed are known to be significant wilding problems in parts of the BOP and should be considered for addition to the list.		
Decision Sought:			
Council Decision:	Accept		
Reasons:	Reference to pinus spp has been removed.		

### Section: 5 Pest Management Framework

Submission Number:	15: 4	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Generally support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	15: 6	Submission Type:	Support in Part
Submitter:	Northland Regional Council		
Submission Summary:	Support rules for managing pest pathways for aquatic and marine pests.  It should be noted that any NPPA species are subject to s52 and s53 of the BSA which includes those listed in Appendix 1. Keep similar rules to NRC relating to possums and mustelids		
Decision Sought:	It may be unclear to the general public that the 'non rpmp' pest species do have rules relating to them under other legislation. Include the following rule relating to possums and mustelids: "No person shall possess any live possum or mustelid in captivity or as a pet."		
Council Decision:	Accept in Part		

## Regional Pest Management Plan Council Decisions by Section

Reasons:	<p>Support noted for aquatic and marine pest management provisions.</p> <p>Agree if pests are listed as an unwanted organism, they are subject to provisions in the Biosecurity Act (namely sections 52 &amp; 53).</p> <p>Cannot include the additional rule as possums and mustelids are not listed in the RPMP and therefore provisions cannot be included to manage them.</p>		
Submission Number:	22: 5	Submission Type:	Oppose
Submitter:	Eastern Region Fish & Game Council		
Submission Summary:	<p>Bay of Plenty Regional Council assuming responsibility for managing compliance to regulations with regards to sports fish species</p> <p>The PRPMP includes provisions outlining responsibilities with regards to preventing the establishment, spread, and eradication of pest species. This includes provisions that can require landowners to remove or destroy them. Regional Council is responsible for monitoring whether pests are present, undertaking control actions and managing compliance with PRPMP regulations.</p> <p>Section 26Q(l) of the Conservation Act 1987 states: "The Junctions of each Fish and Game Council shall be to manage, maintain, and enhance the sports fish and game resource in the recreational interests of anglers and hunters ... "</p> <p>Sports fish are defined in the Conservation Act 1987 as:</p> <p>"Sports fish means every species of freshwater fish that the Governor-General may declare, by Order in Council, to be sports.fish for the purposes of this Act"</p> <p>Regulation 2A of the Freshwater Fisheries Regulations 1983, created by Order in Council, declares that the: "Species of fish specified in Schedule 1 to these Regulations are sports fish. "</p> <p>Schedule 1 of the Regulations lists perch and tench as sports fish.</p> <p>The management of sports fish, including setting regulations, and managing compliance with regulations (rule enforcement and prosecution) is a statutory function of Fish and Game Councils.</p> <p>Section 7(2) of the Biosecurity Act 1993 states: "this Act must not be construed so as to affect or derogate in any way from the provisions of ... the Conservation Act 1987".</p> <p>Further, s 69(1) of the Biosecurity Act 1993 states: To the extent to which a regulation made under this or any other Act is inconsistent with a rule, the regulation prevails.</p> <p>The provisions contained in the PRPMP regarding Regional Council and landowner responsibilities/authority around the management of sports fish (perch and tench) are inconsistent with, and derogate from, the provisions of the Conservation Act 1987. This conflict is prohibited by ss 7(2) and 69(1) of the Biosecurity Act 1993 and is therefore ultra vires.</p> <p>By law the management of sports fish, including setting regulations, and managing compliance with regulations (rule enforcement and prosecution) is the responsibility of Fish and Game Councils funded by license holders, not by Regional Councils funded by regional ratepayers.</p> <p>It is illegal for Regional Councils or any other party (including landowners) to act outside of Fish and Game Sports Fishing Regulations regarding the taking of sports fish. Any person that breaches these Regulations is liable for prosecution.</p>		
Decision Sought:	<p>Fish and Game seeks the deletion of references declaring perch and tench as pest species in the PRPMP, along with any specific duties, actions and responsibilities specified for those species.</p> <p>It is illegal for Regional Councils or any other party (including landowners) to act outside of Fish and Game Sports Fishing Regulations regarding the taking of sports fish. Any person that breaches these Regulations is liable for prosecution.</p>		
Council Decision:	Accept in Part		
Reasons:	To address the Fish and Game concerns regarding conflict with the Conservation Act, following text has been added which acknowledges various legislation and regulations apply to the management of sports fish and that the rules in the PRPMP are subject to the Conservation Act and Freshwater Fisheries Regulations:		

## Regional Pest Management Plan Council Decisions by Section

While perch and tench are defined as pests under this Plan it is acknowledged that they are also 'sports fish' under Part 5A of the Conservation Act 1987. Fish and Game are responsible for managing sports fish under the Conservation Act and the associated Freshwater Fisheries Regulation 1983. The taking or killing of any sports fish is managed through Angler's Notices developed by Fish and Game annually under this legislation or by special license issued by Fish and Game under section 4A of the Freshwater Fisheries Regulation 1983.

Council will engage with, and seek to work in collaboration with Eastern Fish and Game to manage any perch or tench in the Bay of Plenty that present due to any release that has not been legally authorised under either section 26ZM of the Conservation Act or Regulation 62 of the Freshwater Fisheries Regulation.

Staff will include a process in the RPMP Operational Plan that details what steps need to be taken in the event of a Perch or Tench incursion in the Bay of Plenty region. This process will need to ensure all Conservation Act and Freshwater Fisheries Regulations requirements are complied with.

Submission Number:	51: 24	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>Rules play an integral role in securing many of the pest management outcomes sought by the proposed plan. Throughout this section, particularly with regard to animals regarded as pests, the rules are either not presented or not adequate to address the key issues. For example, poorly maintained road reserves act as a vector of pests. However, more often than not the sole rule applied simply states:</p> <p>No person shall possess any living [pest or weed] within the Region etc.</p> <p>This rule and others provided are wholly inadequate in securing the pest management outcomes sought by this plan. The rules are difficult to find in the Plan and are not easily cross-referenced where a pest is in different categories based on location.</p> <p>There needs to be some explanation of BOPRC's anticipated compliance regime after a landowner has been issued a written direction to undertake the eradication work at their expense. Forest &amp; Bird has seen many instances where landowners, in particular Crown agencies, should be undertaking pest management or letting others undertake management on their behalf but the landowner has not been forthcoming. Therefore, some explanation as to the regulatory process on behalf of BOPRC is required i.e. what will BOPRC do if landowners do not comply with these rules even after being presented with written direction. Eg. Rule 6 pg 73.</p> <p>Rules for Sustained Control are unworkable. Rule 4 has a 10m boundary buffer but blackberry is spread by birds far beyond 10m and ragwort and old man's beard are spread by wind.</p> <p>Similarly Rule 5 – the 200m buffer will not be effective with all of the species except lantana because they are spread by birds far and wide or wind (wilding conifers).</p> <p>In addition it is nonsense to say there are no Good Neighbour rules when these rules clearly are, just to avoid binding the Crown.</p>		
Decision Sought:	<p>Craft adequate rules that will actually address the pest management issues at hand for each specific pest addressed, for example:</p> <p>No landowner shall knowingly act as a source of any [relevant pest] and, when notified, shall undertake appropriate pest control.</p> <p>Include a rule that eradication will be the immediate response to illegal releases of goats, game animals and wallabies.</p> <p>Include more workable rules and remove the boundary/buffer distances in Rules 4 and 5.</p>		
Council Decision:	Reject		
Reasons:	<p>Rule 6 is more stringent than the one suggested. Use of word 'knowingly' is subjective and open to interpretation.</p> <p>If someone breached Rule 6 (eg release of pest animal) that is an offence under the Biosecurity Act and could lead to prosecution. An eradication rule is not necessary. For example in the case of an illegal release of a feral goat where it is an Eradication pest, Council will lead the management response.</p>		

## Regional Pest Management Plan Council Decisions by Section

### Section: 5.1 Objectives

Submission Number: 5: 6 Submission Type: Support

Submitter: Lakes Water Quality Society

Submission Summary: Supports adverse effects to be managed.

Decision Sought: Retain adverse effects to be managed.

Council Decision: Comment noted

Reasons: Retain adverse effects to be managed.

### Section: 5.2 Pest Management Programmes

Submission Number: 5: 7 Submission Type: Support

Submitter: Lakes Water Quality Society

Submission Summary: Support pest management programmes

Decision Sought: Retain pest management programmes

Council Decision: Comment noted

Reasons: Retain pest management programmes

Submission Number: 10: 8 Submission Type: Not Applicable

Submitter: Jean-Paul Thull

Submission Summary: We need consistency across the whole Bay eg. same rule for specific pest plant across the region. The rule is confusing when taking account of different rule requirements for different property owners.

Decision Sought: Have same rules across the region.

Council Decision: Reject

Reasons: The cost benefit assessment supports a split region approach. The reality is for some pests in some parts of the region progressive containment is not achievable. Under the Biosecurity Act the programme outcome must be achievable within the duration of the Plan (10 years).

Submission Number: 31: 15 Submission Type: Not Applicable



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## Regional Pest Management Plan

### Council Decisions by Section

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Submitter:	Western Bay of Plenty District Council
Submission Summary:	<p>This section states that a "non-regulatory site-led approach" will be taken to protecting specific values in specific places.</p> <p>The mechanism of "protecting values in places" is not specifically adopted as a tool within the RPMP; however, there is a connection (of sorts) with mention within the Strategic Direction of the RPMP of possible site-led approaches to protect high value sites. We submit that if site-led management is to be a mechanism for implementing the RPMP then this should include details on the circumstances in which it will be adopted and specifically what it will entail.</p> <p>It's also noted that the RPMP anticipates development of pathway management plans, that will effectively be an extension of the RPMP. We submit that these plans should be provided to all submitters on this RPMP for feedback prior to being adopted by BOPRC. WBOPDC supports a site-led approach within naturally biodiverse areas and protected natural areas, especially where all pests within a high value site need to be managed. However, commentary in pages 1 and 2 does not provide any surety of actual BOPRC participation in, or tangible support for, such site-led management. Without inclusion of significant pest plants into the main body of the RPMP (rather than as Non-RPMP pests in Appendix 1) there is every possibility that those pests will be ignored by the proposed RPMP 'toolbox'.</p> <p>Through the District Plan Protection lot Rules, and Community Benefit lot Rules, the WBOPDC has perpetual protection covenants over approximately 400 sites. Several private properties have multiple Protection Areas so there is well in excess of 400 ecological features protected by covenants in favour of WBOPDC. These protected features range from small wetlands to vast tracts of mature native forest. The cumulative size of the natural environment protected in perpetuity by this mechanism is only exceeded in the Bay of Plenty by land under the control of DOC. All of these sites are monitored on an as land under the control of DOC. All of these sites are monitored on an as-required basis by WBOPDC - the average inspection frequency is about three-yearly. Some of these privately-owned ecological features have common interests with BOPRC (e.g. an overlapping BOPRC Environmental Plan), however past efforts by WBOPDC to work collaboratively with BOPRC staff have not always been successful.</p> <p>WBOPDC therefore seek greater surety through the RPMP that the support for site-led management proposed in the Strategic Direction will in fact be adequately resourced to ensure its success.</p> <p>WBOPDC are concerned that generally the BOPRC focus and management structure is catchment protection (minimising sediment entering waterways by 100 year retirement plans involving fencing and planting - not always native planting), rather than protecting ecological values and sustaining pest management within those sites.</p> <p>Also, in respect to Protection Areas on private land, a significant pest threat comes from neighbouring properties where, for instance: woolly nightshade, Taiwan cherry, climbing asparagus fern and pampas are re-infesting protected bush; or grey willow, Tradescantia and Glyceria are washing downstream into legally protected wetlands or riparian margins. To effectively manage such incursions requires an extension of site-led management to exacerbator neighbours in the absence of including the compulsion to control notable pests that are not in the body of the RPMP.</p> <p>If a site led pest management approach is to be retained as a significant component of the RPMP then we submit that this needs to be strengthened by way of greater certainty and directives to BOPRC staff to ensure that it is a real and workable mechanism which supports the environmental efforts of other agencies such as WBOPDC, and some struggling private landowners, and goes beyond the limits of the medium-term riparian covenant areas that BOPRC is engaged with. To this end we submit that an appropriate tool should be included at Table 10 of the RPMP and an appropriate rule or rules written at Table 11 for site led pest management</p>
Decision Sought:	Amend to provide clarity as to when and how a site-led approach will be used.
Council Decision:	Accept in Part
Reasons:	<p>See previous submission point re response to site led approach.</p> <p>With regards to the development of pathway management plans, Council has recently agreed to prepare an inter-regional marine pathway plan. As this is developed (along with any other future pathway plans), the Biosecurity Act clearly sets out process to be followed including consultation and opportunities for submissions.</p>

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Submission Number: 31: 17

Submission Type: Oppose in Part

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## Regional Pest Management Plan

### Council Decisions by Section

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Submitter: Western Bay of Plenty District Council

Submission Summary: Woolly nightshade is a significant pest for the region and a strong response is required.

WBOPDC has expended significant resources on controlling woolly nightshade within its roading and reserve networks over many years. Woolly nightshade has also been an ongoing covenant monitoring and compliance matter for WBOPDC with respect to a number of Protection Areas that it has a legal interest in. Overall, we feel that positive progress is being made with woolly nightshade management. However, during the period of the Operative RPMP it has been frustrating for WBOPDC to see three zones within its territorial boundaries excluded from landowner requirements to control woolly nightshade.

Woolly nightshade has been shown to have allelopathic effects on native seed germination; this, combined with the fact that a single berry from the plant contains approximately 200 seeds (95% of which are viable), demonstrates the intense negative impacts on our environment possible from the pest. Add to this the potential habitat the plant offers for Queensland Fruitfly, and the catastrophic impact the establishment of such an insect would have to our region's horticultural industry, demonstrates the seriousness which should be taken to addressing woolly nightshade. The plant is also a concern for human health, causing skin irritation and respiratory problems. Whilst some of this is acknowledged in the CBA, its potential impacts through sheltering Queensland Fruitfly have not been considered. It is felt that the decision to include woolly nightshade in the sustained controlled programme, rather than the progressive containment programme, in any part of the region, is a significant error.

WBOPDC takes a firm stance on the reduction in priority of any pests, compared to the current operative plan. We note that wild kiwifruit, woolly nightshade and wild ginger, are all currently containment pests and were expected to be destroyed on all land occupied. We are disappointed to see these as sustained controlled pests in the proposed RPMP.

We are pleased to see that the areas where woolly nightshade control was previously not required (Matakana and Welcome Bay areas) have now been included in the plan. However we express our exasperation that the lack of control required in these areas, through the previous plan, has led to significant issues. These areas have acted as 'seed banks', leading to the dispersal of the pest across the sub-region. This has resulted, in part, to its spread and establishment (and it is assumed therefore the decision to reduce its priority in the proposed RPMP). There will now be an increased cost to control these pests in the sub-region. We do not wish to see the mistakes of the past repeated and our entire sub-region left to become a seed-bank for woolly nightshade to spread across the region.

As stated above, WBOPDC spends a significant sum on controlling woolly nightshade on our land and in particular in the road reserve and has had substantial success. Untreated Woolly nightshade on local roads (in the exclusion zone) reduced from 1495m<sup>2</sup> in 2016 to 248m<sup>2</sup> in 2018! Should there no longer be the requirement to undertake this level of control universally across the district (only within 200m of some property boundaries as per rule 5 for sustained control), it is possible the level of control Council undertakes will reduce. If we tried to maintain the same level of control, it is likely that our costs would increase as other landowners reduce their efforts and increased seeds are spread. We do not wish to see the good work we have been achieving in this area undermined and reversed.

Woolly nightshade must be considered a progressive containment pest region wide.

Decision Sought: That woolly nightshade be made a progressive containment pest region-wide.

Council Decision: Accept in Part

Reasons: Cost-benefit analysis was undertaken for Woolly Nightshade management based on a variety of scenarios, including progressive containment and sustained control as well as a sub-regional split between these programmes. The outcome from this analysis was negatively cost beneficial for all scenarios other than sub-regional progressive containment where distribution is low, and sustained control elsewhere.

Where Woolly nightshade has been included as a progressive containment pest, occupiers are required, through Rule 3, to destroy the pest. With regards to woolly nightshade providing a potential habitat for Queensland fruitfly (and if that correlation is confirmed), Council has amended the service delivery for progressive containment to:

Council may provide service delivery for some other progressive containment pests to protect environmental, public or production values.

For the rest of the region, management of Woolly Nightshade is captured by Rule 5 which requires sustained control at adjoining compliant properties. This is due to the community desire to continue investing in controlling this species. The RPMP already states Council may undertake management of sustained control pests as part of its biosecurity programme.

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## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	31: 19	Submission Type:	Oppose
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>WBOPDC takes a firm stance on the reduction in priority of any pests, compared to the current operative plan. We note that wild kiwifruit, woolly nightshade and wild ginger, are all currently containment pests and were expected to be destroyed on all land occupied. We are disappointed to see these as sustained controlled pests in the proposed RPMP.</p> <p>WBOPDC spends a significant sum on controlling pests on our land and in particular in the road reserve and has had substantial success.</p> <p>We do not wish to see this work undone.</p>		
Decision Sought:	That wild ginger be made a progressive containment pest region-wide.		
Council Decision:	Reject		
Reasons:	No changes will be made to the management programme for Wild Ginger as the sustained control management programme is more positively cost-beneficial due to the widespread distribution of the pest.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	51: 19	Submission Type:	Oppose in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	The decision not to use "Protecting Values at Places" and use non-regulatory approaches only is flawed.		
Decision Sought:	Revise the Plan to include Protecting Values at Places and include provisions to prevent sale and distribution of the species damaging indigenous values.		
Council Decision:	Reject		
Reasons:	<p>Firstly, a number of BOPRC's core activities contribute directly to biodiversity outcomes, including pests not in the PRPMP. To protect biodiversity values, a site led approach is preferred which focuses on the biodiversity values to be protected. Rather than focusing on individual pest species, all pest threats within a high value site need to be managed. BOPRC's current biodiversity approach is voluntary and bringing in site led rules could significantly change the way staff engage with landowners on biodiversity protection.</p> <p>Secondly, the National Policy Direction has quite specific requirements for site led rules which reduce the flexibility in adapting the biodiversity programme to new threats.</p> <p>Council sees no reason to change the current approach which works well and maintain that site led rules do not align well with BOPRC's other work programmes but recommend the following text is added text to the RPMP to explain BOPRC's pest management activities that support our voluntary (site-led) biodiversity programme:</p> <p>"The Proposed RPMP has not adopted a site-led approach and will continue to protect high value sites through non-regulatory methods, funded through Council's biodiversity work programme".</p> <p>Both Biosecurity Act provisions (sections 52 and 53) and BOPRC education and advice will continue to have a role in managing other pests.</p>		

Submission Number:	54: 5	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	<p>The Department supports the concept of zonation of the Bay of Plenty region to provide more focused pest management objectives in zones across this landscape. This reflects both the varying density and threat of pests across the region, and the practicality and affordability of managing pests within zones. We believe there is merit in considering further zonation for various species, including heather and goats in particular and we would welcome the opportunity to discuss this further.</p> <p>Catchment boundaries have been used to zonate different plant and animal pests. We understand this is to align with other Council planning systems. We would like to note that further zonation would make sense from a pest management perspective. This submission makes suggestions below for various species which may better reflect their distributions and physical barriers in the BOP.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support for sub regional split noted. Requests for other species to have additional sub regional programmes are addresses individually.		

### Section: 5.3 Principal measures to manage pests

Submission Number:	2: 3	Submission Type:	Not Applicable
Submitter:	Maru Tapsell		
Submission Summary:	Pay trappers per head for animal pests		
Decision Sought:	Incentivise people to trap/kill animal pests by paying them per head.		
Council Decision:	Not Applicable		
Reasons:	The RPMP does not include detail on how pests should be managed. The methods to manage pests are outside the scope of the RPMP.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	3: 1	Submission Type:	Support in Part
Submitter:	Jan Caudwell		
Submission Summary:	Many new residents are unaware of the potential problem of not containing plant pests on their property, the growth habit of plant, or that they should remove it early (eg before flowering).		
Decision Sought:	More public awareness strategies for plant pests eg. articles in local publications.		
Council Decision:	Comment noted		
Reasons:	Providing education and advice on pest management is part of our strategic direction in the RPMP.		
Submission Number:	11: 4	Submission Type:	Not Applicable
Submitter:	Ian Noble		
Submission Summary:	Page 24 3 & 4 – Service delivery. Council may and Advocacy education may – should not this read Council will? Council provides funds to make the RPMP effective.		
Decision Sought:	Change wording and level of commitment in section 5.3(4) from 'may' to 'will'.		
Council Decision:	Reject		
Reasons:	Council may undertake some or all of the actions listed. Using the word "will" takes away from Councils flexibility to choose the best action appropriate for a given scenario. For example, it may not be appropriate or possible to deliver a user pays system if the beneficiaries cannot be identified, or providing traps may not be the most effective use of resources.		
Submission Number:	11: 5	Submission Type:	Not Applicable
Submitter:	Ian Noble		
Submission Summary:	<p>What if a levy on all export logs was imposed and the funds put to control these pests. What if Wallaby, rabbits, possums and other animal pests were pre fed and then poisoned. Council do little other than report on the expansion of the area that is home for them, which is a judgement on Council.</p> <p>Consideration of a Wallaby Rate? "A different approach!" What if Council charge for property inspections and reports to Land Owners and the required work to be done. If not Council, have the work done and the costs recovered. Other Councils do this. This practice should be the norm and all such actions be reported publicly.</p>		
Decision Sought:	Consider alternatives to service delivery measures in Proposed RPMP		
Council Decision:	Comment noted		
Reasons:	Council is constantly considering ways to fund biosecurity operations and works with other Councils who have introduced new cost mechanisms.		
Submission Number:	21: 12	Submission Type:	Support
Submitter:	Mawera Karetai		
Submission Summary:	Do this!		
Decision Sought:	Carry out these principal measures		
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	51: 13	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	Reference to pathway management is made on p 2 under Strategic Direction and in Rule 7 p74 where boats and trailers are a pathway for spread of freshwater pests. It is not clear whether this constitutes a pathway management plan. Other pests require pathway management such as marine pests which are moved through aquaculture equipment and recreational and commercial boating. Agricultural pests are also being spread by machinery e.g. alligator weed and purple nutsedge.		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought:	Clarify the pathway management plans for marine and freshwater pests including didymo, and for kauri dieback and myrtle rust. Review pests spread along roads, rail corridors and streams.
Council Decision:	Accept in Part
Reasons:	Kauri dieback and myrtle rust are national led initiatives.  Council has not committed to developing any pathway management plan for agricultural pests but does include a pathway approach as part of its strategic direction.

Submission Number:	51: 20	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	The proposed plan mentions MOUs with other government agencies. However there is no detail about what these MOUs cover and what is required of, say roading authorities. (See 7.2 of Waikato Regional Pest Management Plan).		
Decision Sought:	Include detail on the composition of the MOUs and update them to be consistent with this Plan.		
Council Decision:	Accept in Part		
Reasons:	MOUs will be made publicly available to show level of pest management commitment from other parties.		

### Section: General

Submission Number:	13: 1	Submission Type:	Seek Amendment
Submitter:	Hank Hodge		
Submission Summary:	Support monitoring of progressive containment and sustained control programmes but would like to see them tweaked. And grateful for funding contributions I have received in the past including developing wetlands and riparian plantings contributing to better environment.  Funding for control of WNS was available when I first purchased my property. This was a great help in dealing with the plant along with long hours of my own time and money. Control was good. Unfortunately a neighbouring property did not make use of this funding and did not have any control in place hence last forests of WNS (with untold seeds) came over my boundary. This is now causing a major headache and become very expensive to control.		
Decision Sought:	Funding from the regional council to help with the control of woolly nightshade would be a great step forward.		
Council Decision:	Accept in Part		
Reasons:	Where woolly nightshade has been included as a progressive containment pest, occupiers are required through rule 3 to destroy the pest. For the rest of the region, management of woolly nightshade is captured by Rule 5 which requires sustained control at adjoining compliant properties. This is due to the community desire to continue investing in controlling these species. Through recent workshops Council has opted to support funding the suppression of woolly nightshade along property boundaries and support for capability-building to assist with control on unadministered Maori land (not wide spread suppression).		

### Section: Plan in General

Submission Number:	10: 1	Submission Type:	Not Applicable
Submitter:	Jean-Paul Thull		
Submission Summary:	I was pleasantly surprised to meet BOP RC specialists supporting rural property owners with advice and some financial support. It is good to see BOP RC taking leadership as a council in that respect.		
Decision Sought:	Regular monitoring associated with information/advice, support, progress reports and incentives need to be considered to effectively manage pests.		
Council Decision:	Comment noted		
Reasons:	Advice and education is part of Council's strategic direction. Monitoring and reporting are part of the RPMP operational plan that sits alongside the RPMP.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	11: 3	Submission Type:	Oppose
Submitter:	Ian Noble		
Submission Summary:	<p>3.4 – There are no “Good Neighbour” rules in the proposed Plan. The legislation was amended to bind the Crown but Council has chosen rather to enter into separate agreements. I do not understand why.</p> <p>Crown Agencies do not pay rates nor do they pay half of the cost of boundary fences, but animal pests and weeds do not respect boundaries.</p> <p>Territorial authorities have taken harbour and stream edges as part of property subdivision. In some situations they are a conduit for the spread of pests.</p>		
Decision Sought:	Include Good Neighbour rules to bind the crown.		
Council Decision:	Reject		
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of “Good Neighbour Rules” (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.</p> <p>Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020):</p> <p>"However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on the development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council? Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p> <p>An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.</p> <p>Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.</p>		

## Regional Pest Management Plan Council Decisions by Section

### Section: 5.4 Rules

Submission Number:	4: 4	Submission Type:	Seek Amendment
Submitter:	Martin and Jane Munro		
Submission Summary:	Good neighbour rules must stay included in the Proposed RPMP. Especially now it binds the Crown which can allow the use of legal means to enforce.		
Decision Sought:	Include Good Neighbour rules in the RPMP.		
Council Decision:	Reject		
Reasons:	<p>The Biosecurity Act 1993 (the Act), as amended, introduced the concept of "Good Neighbour Rules" (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.</p> <p>If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act. Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:</p> <p>New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes &amp; Lessons Learned (July 2020):          "However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on t development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."</p> <p>Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council? Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.</p> <p>An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.</p> <p>Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.</p>		

Submission Number:	22: 4	Submission Type:	Oppose
Submitter:	Eastern Region Fish & Game Council		
Submission Summary:	<p>Using the PRPMP to set regulations that conflict with Fish and Game Fishing Regulations</p> <p>The PRPMP contains provisions relating to the control/eradication of incursions of perch and tench by landowners and council which are inconsistent with the Anglers Notice.</p> <p>Pursuant to s 26R(3) of the Conservation Act 1987 Fish and Game Councils are responsible for preparing Anglers Notices. Under s 69(1) of the Biosecurity Act 1993 the rules in a PRPMP cannot be inconsistent with the regulations made under any Act.</p> <p>Under s 29 of the Interpretation Act 1999 a regulation includes: "(b) an Order in Council, Proclamation, notice, Warrant, or instrument, made under an enactment that varies or extends the scope or provisions of an enactment ..."</p>		



## Regional Pest Management Plan Council Decisions by Section

The Anglers Notice fits within the meaning of a regulation because it requires the approval of the Minister of Conservation, and, if approved, it is published in the New Zealand Gazette.

Because the Anglers Notice is a regulation, the PRPMP cannot contain regulations that are in conflict with those set by Fish and Game under the Conservation Act 1987.

The Anglers Notice set out rules for fishing for sports fish (including perch and tench) in the Eastern Region. Further requirements are set out in the Conservation Act 1987. Broadly any person fishing for sports fish must hold a current sports fishing license. Eastern Region has no defined 'coarse fishing waters' so perch and tench can only be taken by use of a rod and running line, and authorised lure. The particular regulations vary greatly between water bodies, and set out;

The size and limit bag for sports fish  
The open and closed season for each water body  
Requirements, restrictions, or prohibitions on fishing tackle and methods  
The hours of fishing

Decision Sought: Fish and Game seeks the deletion of references declaring perch and tench as pest species in the PRPMP, along with any specific duties, actions and responsibilities specified for those species.

Council Decision: Accept in Part

Reasons: If an incursion occurs BOPRC would seek the appropriate permissions under the Conversation Act and Freshwater Fisheries Regulations to manage (destroy) the pest.

Under Regulation 4A of the Freshwater Fisheries Regulations the Minister may authorise a Fish and Game Council to issue special licenses to take sports fish for any purpose approved by the Minister. Any such special licence must specify the waters in which the holder is permitted to take sports fish. Fish taken must be disposed of as the Fish and Council directs. The license is revocable by the Fish and Game Council.

A more complicated scenario is the management of perch and tench that are present due to any release that has not been authorised under the Conservation Act or Fisheries Regulations. To this effect the following text has been added to the RPMP:

Council will engage with, and seek to work in collaboration with Eastern Fish and Game to manage any perch or tench in the Bay of Plenty that present due to any release that has not been legally authorised under either section 26ZM of the Conservation Act or Regulation 62 of the Freshwater Fisheries Regulation

Submission Number:	29: 2	Submission Type:	Oppose
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Submitter:	Federated Farmers
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Submission Summary:	We understand that 'good neighbour' rules are able to now bind the Crown after amendments to the Biosecurity Act 1993. FPNZ asks that good neighbour rules form part of the plan and that any good neighbour rules should not be watered down to ensure that the Crown are treated the same as other landowners.
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It is the general experience of our members that Crown land, Department of Conservation and Territorial Local Authorities do not proactively control pests, but often rather choose to wait until there are obvious problems and control is therefore more difficult. Farmers are generally the good neighbour and any good practices by the farmer is largely undermined. It is accepted that pest management generally is not effective unless all landowners (including Crown) consistently manage the spread of pest.

The negotiated understanding around potential boundary pests between the Regional Council and Crown agencies are of little comfort to our members as they have no means to enforce it and requires the Regional Council to be pro-active, incur costs and navigate a political minefield with agencies it needs to co-operate with.

We also consider that rules 3, 4, 5 and 9 should be designated as "Good Neighbour Rules". In summary we consider the reasons are:

- a. If the region is to control a pest it makes sense that the pest does not have a safe haven to breed and multiply in.
- b. It is also unfair to expect the 'good neighbour' to pay for the problems created by the bad neighbour's lack of pest control. FPNZ believes that the Crown should contribute on the same basis as any other land

## Regional Pest Management Plan Council Decisions by Section

occupier within the region.

c. The bad neighbour benefits from the adjacent landowners that actively controls their pest.

d. It ensures plant and animal pest on non-rateable, Crown, Department of Conservation and Council land are adequately funded and controlled.

Decision Sought: That Good Neighbour rules are expressed to bind the Crown.

That Rules 3, 4, 5 and 9 are designated as "Good Neighbour Rules"

Council Decision: Reject

Reasons: The Biosecurity Act 1993 (the Act), as amended, introduced the concept of "Good Neighbour Rules" (GNRs). A GNR transfers some costs of pest management to the occupier of the land who has the pest, where costs are caused to adjacent occupiers and those costs are likely to be unreasonable. A GNR requires land occupiers, including the Crown (who is not clearly defined in the Act), to prevent pests from affecting adjacent properties.

If GNRs are introduced they must comply with the National Policy Direction for Pest Management 2015 and they require councils to consider specific issues including the cost of meeting compliance requirements for GNR under the Act.

Throughout the RPMP development process Council considered these compliance requirements and identified difficulties with developing GNR rules that would be workable and enforceable. These concerns have recently been acknowledged and echoed by other councils in a recent piece of research:

New Generation Regional Pest Management Plans - A National Review of RPMP Development Processes & Lessons Learned (July 2020):

"However, it has been consistently raised that many respondents struggled with Good Neighbour Rules, and found the guidance given on the development of these to be confusing. Many respondents have commented that they would not include Good Neighbour Rules in their RPMPs in future, and query whether the rules could be legally enforced."

Notwithstanding the difficulties in meeting GNR requirements defined by the Act (including on-going compliance and regulation), BOPRC is supportive of the intent of GNR. This intent has been provided for in Rules 4 and 5 (sustained control) of the RPMP by requiring boundary control of pests. For example, if a land owner is actively managing a pest on their boundary, the adjoining landowner is required to do the same. These rules also require active management by landowners if they receive written direction by Council? Such active management requirements can be triggered by pest spread, characteristics of the pest, and impacts on neighbours or high value sites.

An added area of confusion with developing GNRs is understanding who the Crown is (under the Biosecurity Act) and therefore who would be bound by provisions in the RPMP. BOPRC does not consider Crown entities and SOEs as the Crown and so they are treated like all other occupiers. The Department of Conservation (DOC) is a major Crown entity/landowner in the Bay of Plenty. Council works with DOC to manage the risk of pests spreading from Public Conservation Lands to adjoining properties through a memorandum of understanding. Each year high risk sites for RPMP pests are identified and control works are scheduled and implemented. This work is funded by DOC.

Another Crown entity is Land Information New Zealand (LINZ). Council works closely with LINZ to manage pests on lands they administer and, in particular, the Rotorua Lakes where they are responsible for the control of aquatic pest plants on behalf of the Crown.

Submission Number: 31: 9 Submission Type: Oppose

Submitter: Western Bay of Plenty District Council

Submission Summary: MOUs with Crown agencies may be a useful tool to deliver on the outcomes of the RPMP while acknowledging some of the logistical issues. However, these should not unduly diminish their responsibilities.

It's not possible to submit meaningful comment on this matter as any existing written agreements, or a standard template for any possible agreements which may not yet be settled, have not been included as part of the RPMP.

That said, within this RPMP, territorial authorities and regional authorities have been expressly excluded from this provision. That separation may be historic, insofar as the Crown agencies were not subject to the Operative RPMP, whereas territorial authorities have been thus far.

From 12B(2)(d) of the Biosecurity Act it's understood that the RPMP should be fair and equitable. This equity of responsibility shouldn't mean a diminution of territorial authority responsibilities, rather it should be reflected in Crown agency agreements being consistent with pest management requirements upon territorial authorities, which is also akin to corporate and private landowner responsibilities. Put

## Regional Pest Management Plan Council Decisions by Section

	simply, what's the point in private landowners and territorial authorities controlling pests if Crown entities are not required to do the same in the same general areas?
Decision Sought:	Amend parts to ensure MOU and other agreements with Crown agencies are consistent with pest management requirements upon territorial authorities.
Council Decision:	Accept
Reasons:	Territorial authorities, landowners and Crown entities are subject to provisions in the RPMP.  Agreed MOUs will be publicly available so the regional community is assured MOU holders are committed to an appropriate level of pest management effort.

### Section: 6 Pest Descriptions

Submission Number:	30: 7	Submission Type:	Seek Amendment
Submitter:	New Zealand Transport Agency		
Submission Summary:	For ease of use/ navigation, we suggest that the programme type (e.g. progressive containment) is shown in the header of each page in this section.		
Decision Sought:	Amendment - Add programme into the header of Section 6		
Council Decision:	Accept		
Reasons:	This is a formatting issue that was easily accommodated.		
Submission Number:	5: 13	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Consider establishment of a sensitive Zone for the Rotorua Lakes		
Decision Sought:	Consider establishment of a sensitive Zone for the Rotorua Lakes		
Council Decision:	Accept		
Reasons:	Perch, Rudd, Tench and Koi Carp have been added as Exclusion pests for the Rotorua Lakes. Maps have been produced to reflect this change.		
Submission Number:	10: 6	Submission Type:	Not Applicable
Submitter:	Jean-Paul Thull		
Submission Summary:	Chinese privet is hard to eradicate but not on your list, probably because it has taken over whole areas like Katikati.		
Decision Sought:	Consider Chinese Privet for RPMP inclusion		
Council Decision:	Accept in Part		
Reasons:	CBA suggests managing privet in the RPMP is negatively cost-beneficial. Cost of implementing a programme is extremely high and beyond the current resourcing of the programme.  However Privet has now been added to Appendix 1 as an Advisory pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	11: 12	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	Woolly nightshade has the potential of being a host to some future incursion that will affect the Horticulture Industry.		
Decision Sought:	Reassess status of woolly nightshade.		
Council Decision:	Reject		
Reasons:	CBA indicates progressive containment throughout region is not cost-beneficial, except in some areas where distribution is low. A rule focused on boundary control at adjoining compliant properties has been included due to community will to continue investing in controlling this species.		

Submission Number:	15: 5	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Generally support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	31: 16	Submission Type:	Oppose in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	WBOPDC does not support a sub-regional approach being taken to pest management. We wish to see the region collectively address pest problems and work together to prevent the spread of any pest species. It is also noted that the funding for this activity is collected region-wide as part of the general rate and to focus pest management approaches on specific areas would lend itself better to a targeted rating approach.		
Decision Sought:	That a regional approach be taken for all pests		
Council Decision:	Reject		
Reasons:	The split regional approach reflects CBA results. Note that there will no longer be a split regional programme to manage wild kiwifruit.		

### Section: 6.1 Exclusion pests

Submission Number:	19: 9	Submission Type:	Seek Amendment
Submitter:	Waikato Regional Council		
Submission Summary:	The last sentence before the table 2 heading needs clarification, as it reads now it is incorrect, especially for the first pest alligator weed, where it states that 'these pests are not known to be present in our region'. Alligator weed is present but it is subject to exclusion only in parts of the region. This section needs to state that "... in the region, or are subject to exclusion programmes in only parts of the region.		
Decision Sought:	Add clarifying sentence as follows. ... This section needs to state that "... in the region, or are subject to exclusion programmes in only parts of the region.		
Council Decision:	Accept		
Reasons:	Clarification added.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	32: 2	Submission Type:	Neutral
Submitter:	Heather Donald		
Submission Summary:	'Exclusion' page 34. A very high bar indeed is set here as I am sure the Pest Plant staff are aware that the plants identified in this class do already exist within the region. If not why are they identified?? I do hope all pest plants in this category in the BOP are all destroyed.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	To BOPRC's knowledge pests included in the exclusion programme are not in our region. However due to their proximity to our region, the way they spread or the likely effects they will have on the region, Council wants to put effort into keeping them out.		
Submission Number:	33: 2	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the exclusion of Alligator weed.		
Decision Sought:	LINZ supports the retention of Table 2 and Map 1 for the management of Alligator weed as an exclusion pest.		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	33: 3	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the exclusion of Egeria from lakes Rotoehu, Rotoma, Okataina, Tikitapu, Rotokakahi and Okaro.		
Decision Sought:	LINZ supports the retention of Table 2 and Map 4 for the management of Egeria as an exclusion pest for lakes Rotoehu, Rotoma, Okataina, Tikitapu, Rotokakahi and Okaro.		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	33: 4	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the exclusion of Elodea from Lake Rotomahana.		
Decision Sought:	LINZ supports the retention of Table 2 and Map 5 for the management of Elodea as an exclusion pest for Lake Rotomahana		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	33: 5	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the exclusion of Hornwort from lakes Rotoma, Tikitapu, Rotokakahi, Okaro and Rerewhakaaitu		
Decision Sought:	LINZ supports the retention of Table 2 and Map 6 for the management of Hornwort as an exclusion pest for lakes Rotoma, Tikitapu, Rotokakahi, Okaro and Rerewhakaaitu.		
Council Decision:	Comment noted		
Reasons:	Support noted		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	33: 6	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the exclusion of Lagarosiphon from Lake Rotokakahi, Rotomahana and Okaro		
Decision Sought:	LINZ supports the retention of Table 2 and Map 8 for the management of Lagarosiphon as an exclusion pest for Lake Rotokakahi, Rotomahana and Okaro.		
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	48: 3	Submission Type:	Not Applicable
Submitter:	Rotorua Lakes Community Board		
Submission Summary:			
Decision Sought:	We request that Koi Carp, Perch, Rudd and Tench be categorised as exclusion pests for the Rotorua Lake catchments.		
Council Decision:	Accept in Part		
Reasons:	Perch, Rudd, Tench and Koi Carp have been added to the Exclusion management programme areas where the pests do not currently exist and eradication or progressive containment programmes where these pests are currently present.		

Submission Number:	54: 6	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	The Department supports the status of all current Exclusion pests.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

<b>Section: General</b>
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Submission Number:	5: 10	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Include Perch as an exclusion pest instead of an eradication pest		
Decision Sought:	Include Perch as an exclusion pest instead of an eradication pest		
Council Decision:	Accept		
Reasons:	CBA indicates managing perch as an exclusion pest in Rotorua Lakes area is positively cost beneficial. There is very limited distribution of Perch within the region but there is potential for them to have a significant impact on native fish and water quality. Perch will be added as an exclusion pest where they do not already exist and as an eradication pest where they do exist.		

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## Regional Pest Management Plan Council Decisions by Section

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<b>Section:</b>	<b>Proposed Regional Pest Management Plan</b>
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Submission Number:	5: 9	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Include Koi carp as an exclusion pest instead of an eradication pest		
Decision Sought:	Include Koi carp as an exclusion pest instead of an eradication pest		
Council Decision:	Accept in Part		
Reasons:	Add Koi carp as an exclusion pest where Koi carp do not already exist and eradication where they do exist.		

## Regional Pest Management Plan Council Decisions by Section

### Section: Table 3 Management Regime

Submission Number:	51: 22	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	There is information available from other councils e.g. Auckland Council about other species that could thrive in the Bay of Plenty and these should be included. It is unlikely any additional costs would be involved because they would be identified in the council's surveillance programme for other pests.		
Decision Sought:	Review species that are pests in neighbouring regions that are likely to arrive in the region and include them in the plan as exclusion pests.		
Council Decision:	Accept in Part		
Reasons:	<p>Amended to section 2.1 Surveillance and Monitoring Programme to read:</p> <p>The purpose of this monitoring and surveillance is to fully understand risks to our region, what a pest's impact may be, how pests are distributed, and how fast they are spreading and future threats including where these pests are likely to come from. BOPRC have a 'new to region' surveillance programme that looks to identify potential invasive species not currently recognised in the RPMP. If a new species is discovered a risk assessment will be undertaken and if appropriate the species could be added to the RPMP at a later date.</p>		

Submission Number:	51: 23	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	The Requirements to act refer to rules that are not included in the table.		
Decision Sought:	Include a table with all of the rules that apply to each category of pest.		
Council Decision:	Reject		
Reasons:	This is a formatting issue. To avoid duplication the generic rules are included in RPMP once and all Programme Tables refer reader to Generic rules.		

### Section: 6.2 Eradication Pests

Submission Number:	32: 3	Submission Type:	Not Applicable
Submitter:	Heather Donald		
Submission Summary:	'Eradication' page 45. A high bar has been set for this category in the measurement of the outcome. Suggest on the history of these plants that the outcome will not be achieved. I do note that the glossary of terms does offer an out.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Council has only included pests in the eradication programme, if it believes eradication is an achievable objective over the lifetime of this plan.		
Submission Number:	33: 7	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports Council acting as a lead agency or partner in eradication of the pest species identified in Table 4.		
Decision Sought:	LINZ supports Council being the lead agency or partner for the eradication of the pests listed in Table 4.		
Council Decision:	Accept		
Reasons:	Support noted		



## Regional Pest Management Plan Council Decisions by Section

Submission Number:	33: 9	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	Amendments to Table 5 are sought to reflect that the eradication programme may be delivered by Council in partnership with other agencies, including LINZ. Boffa Miskell (on behalf of LINZ) manages control works at lakes Okataina and Okareka.		
Decision Sought:	LINZ requests the following amendment to Table 5: Service Delivery: Council will undertake control of these pests (or any eradication pests listed in Table 2 that enter the region). Council will continue to work with other agencies on pests of mutual interest or support other agencies who have a clear leadership role in managing particular pests.		
Council Decision:	Accept		
Reasons:	Sentence added to Table 5:  Council will continue to work with other agencies on pests of mutual interest or support other agencies who have a clear leadership role in managing particular pests.		

### Section: General

Submission Number:	5: 12	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Include Tench as an eradication pest instead of progressive containment		
Decision Sought:	Include Tench as an eradication pest instead of progressive containment		
Council Decision:	Accept		
Reasons:	CBA indicates managing Tench as an exclusion pest in Rotorua Lakes area is positively cost beneficial. There is very limited distribution of Tench within the region but there is the potential for them to have significant impact on native fish and water quality.  Tench added as an exclusion pest where they do not already exist and progressive containment where they do exist.		

Submission Number:	6: 1	Submission Type:	Support
Submitter:	Port Blakely Forestry		
Submission Summary:	Support BOPRC taking the lead on this program and will continue to support and work with Council on this. Port Blakely has been the principal driver of the Coastal Tea Tree Program on Matakana Island previously and looks forward to a more effective approach lead by BOPRC.		
Decision Sought:	Retain Coastal Tree as an eradication program whereby Council leads management of this pest		
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	54: 7	Submission Type:	Not Applicable
Submitter:	Department of Conservation		
Submission Summary:	The Department supports the status of all current Eradication pests.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

## Regional Pest Management Plan Council Decisions by Section

### Section: Table 5 Management Regime

Submission Number:	51: 25	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:			
Decision Sought:	Either include a separate rule table for all categories or include the text of the rules 6-8.		
Council Decision:	Reject		
Reasons:	This is a formatting issue. To avoid duplication the generic rules are included in RPMP once and all Programme Tables refer reader to Generic rules.		

### Section: 6 Pest Descriptions

Submission Number:	33: 10	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	Table 6 lists Darwin's barberry as being a 'Progressive Containment' pest. However, Map 3 for Darwin's barberry shows the area as 'eradication'. This appears to be a mistake in the mapping.		
Decision Sought:	LINZ submits that the mapped area and legend of Map 3 should be amended.		
Council Decision:	Accept		
Reasons:	Map amended		

### Section: 6.3 Progressive Containment

Submission Number:	32: 4	Submission Type:	Neutral
Submitter:	Heather Donald		
Submission Summary:	'Progressive Containment' page 60. No real comment about this other than to suggest that where some of these plants do not survive well or are essentially non existent they are mapped in this category.		
Decision Sought:	Suggest that where some of these plants do not survive well or are essentially non existent they are mapped in this category.		
Council Decision:	Comment noted		
Reasons:	Comment noted. Relief sought is unclear.		
Submission Number:	33: 8	Submission Type:	Support in Part
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that 'progressive containment' of Hornwort is an achievable objective for lakes Okataina and Okareka. It is unclear how eradication of Hornwort would be achievable within the life of the plan, given the current levels of investment into weed management in these waterbodies. Further, there is a risk of hornwort being reintroduced to these waterbodies through lake users. LINZ concurs that eradication of Hornwort is an appropriate long-term objective		
Decision Sought:	LINZ submits that Hornwort at lakes Okataina and Okareka should be managed as part of Te Kaupapa Aukati i te Horapatanga/Progressive containment programme.		
Council Decision:	Reject		
Reasons:	CBA indicates that all programmes are positively cost beneficial. Eradication of Hornwort within Lake Okataina and Lake Okareka had greatest positive cost-benefit.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	33: 12	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that 'progressive containment' of Hornwort is the current objective for lakes Okataina and Okareka.		
Decision Sought:	LINZ submits that Hornwort at lakes Okataina and Okareka should be managed as part of Te Kaupapa Aukati i te Horapatanga / Progressive containment programme, with consequential amendments to Table 6 and Map 6.		
Council Decision:	Reject		
Reasons:	CBA indicates that all programmes are positively cost beneficial. Progressive Containment of Hornwort is highly cost beneficial and achievable.		
Submission Number:	33: 13	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits against progressive containment of Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana and instead seeks that this is changed to sustained control.		
Decision Sought:	LINZ submits that Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana should be managed as part of Te Kaupapa Pupuri Whakauka/Sustained control programme.		
Council Decision:	Reject		
Reasons:	CBA indicates that all programmes are positively cost beneficial. Progressive Containment of Hornwort is highly cost beneficial and achievable.		
Submission Number:	33: 14	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits against progressive containment of Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana and instead seeks that this is changed to sustained control.		
Decision Sought:	LINZ submits that Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana should be managed as part of Te Kaupapa Pupuri Whakauka/Sustained control programme.		
Council Decision:	Reject		
Reasons:	CBA indicates that all programmes are positively cost beneficial. Progressive Containment of Hornwort is highly cost beneficial and achievable.		
Submission Number:	33: 15	Submission Type:	Not Applicable
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits against progressive containment of Lagarosiphon in Lakes Rotorua, Rotoiti, Rotoehu, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu and instead seeks that this is changed to sustained control.		
Decision Sought:	LINZ submits that Lagarosiphon in Lakes Rotorua, Rotoiti, Rotoehu, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu should be managed as part of Te Kaupapa Pupuri Whakauka / Sustained control programme.		
Council Decision:	Reject		
Reasons:	CBA has determined that progressive containment of Lagarosiphon within Lakes Rotorua, Rotoiti, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu had greatest positive cost-benefit.		

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## Regional Pest Management Plan Council Decisions by Section

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<b>Section:    General</b>
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Submission Number:	5: 8	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Include Elodea as a Progressive Containment pest.		
Decision Sought:	Include Elodea as a Progressive Containment pest instead of sustained control.		
Council Decision:	Reject		
Reasons:	CBA indicates strong cost benefit for exclusion from Lake Rotomahana and sustained control in other Rotorua lakes.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	5: 11	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	Include Rudd as an eradication pest instead of progressive containment		
Decision Sought:	Include Rudd as an eradication pest instead of progressive containment		
Council Decision:	Accept in Part		
Reasons:	<p>CBA indicates managing Rudd as an exclusion pest in Rotorua Lakes area is positively cost beneficial. There is very limited distribution of Rudd within the region but the potential to have significant impact on native fish and water quality.</p> <p>Rudd will be added as an exclusion pest where they do not already exist and progressive containment where they do exist.</p>		
Submission Number:	6: 2	Submission Type:	Seek Amendment
Submitter:	Port Blakely Forestry		
Submission Summary:	As a large land owner, what is the scope regarding progressive containment requirements. Eg. What does the Progressive Containment object actually mean? Does this mean contain within the property and reduce these pests when these pests are identified or are land owners expected to actively survey properties for these pest species? Due to the size and geographical layout of our estate this would not be able to be done in a cost effective and productive way.		
Decision Sought:	Provide clarity on progressive containment requirements for land owners.		
Council Decision:	Reject		
Reasons:	Council considers the progressive containment requirements are outlined clearly in Rule 3 and occupiers can enter into a progressive containment written agreement if there are complexities around meeting rule requirements (ie destruction of progressive containment pests).		
Submission Number:	33: 11	Submission Type:	Oppose
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits against progressive containment of Egeria in Lakes Rotorua, Rotoiti, Okareka, Tarawera, Rotomahana and Rerewhakaaitu and instead seeks that this is changed to sustained control.		
Decision Sought:	LINZ submits that Egeria in Lakes Rotorua, Rotoiti, Okareka, Tarawera, Rotomahana and Rerewhakaaitu should be managed as part Te Kaupapa Pupuri Whakauka/Sustained control programme.		
Council Decision:	Reject		
Reasons:	CBA determines that progressive containment of Egeria within Lakes Rotorua, Rotoiti, Okareka, Tarawera, Rerewhakaaitu and Rotomahana had greatest positive cost-benefit.		
Submission Number:	52: 16	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	Objective and Programme - Proposed Plan lacks specifics on the reduction of contorta. MPI recommends the Plan include a measure in reduction over time.		
Decision Sought:	Over {the duration of the Plan/an alternative prescribed timeframe}, to {contain/reduce} the geographic distribution of {wilding conifers and/or Contorta pine, Scots pine, Dwarf mountain pine, Mountain pine or European larch} {to specified area(s) or zone(s) / to X % of their current area/density (as at X date) / by X% within the region/specified area(s) or zone(s)} in order to reduce the adverse effects of wilding conifers on pastoral production, indigenous biodiversity, cultural and landscape values in the region.		
Council Decision:	Accept in Part		
Reasons:	Council considered including measures in reduction over time. The reductions that can be achieved are largely related to the funding that will be available when this RPMP is adopted. As funding decisions are yet to be finalised, the reductions will be included in the Operational Plan.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 8	Submission Type:	Neutral
Submitter:	Department of Conservation		
Submission Summary:	It is noted that the proposed control strategy of requiring landowner funded control may be inefficient for many of these species listed and does not reflect the current Council funded control programmes which are occurring for some of these species. As many of these species are limited in distribution, it may continue to be more efficient for targeted control to be undertaken by Council. Many of these species are also a priority and being controlled on public conservation land by the Department.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Comment noted		

### Section: 6.3 Progressive Containmentment

Submission Number:	52: 11	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>There is the potential to provide for regulatory support through the use of RPMP rules to address situations where wilding conifer spread from planted conifers is generating unreasonable impacts on neighbouring land, or threatening key areas of value.</p> <p>One of the statutory consequences of specifying an organism as a pest is that it triggers ss 52 and 53 of the BSA, which prohibit the propagation, sale, breeding, communication, release etc of the species. Where a species that causes wilding conifer spread also has significant value as a planted and commercially managed resource, as is the case for a number of the conifer species, this creates an untenable outcome.</p>		
Decision Sought:	<p>Conifer species recommended for inclusion in RPMPs as pests:</p> <ul style="list-style-type: none"> <li>- Lodgepole or contorta pine (<i>Pinus contorta</i>)</li> <li>- Scots pine (<i>Pinus sylvestris</i>)</li> <li>- Dwarf mountain pine and mountain pine (<i>Pinus mugo</i> and <i>Pinus uncinata</i>)</li> <li>- European larch (<i>Larix decidua</i>)*</li> </ul> <p>*Excludes sterile hybrids</p>		
Council Decision:	Accept in Part		
Reasons:	<p>In response to these submissions, changes have been recommended to include the MPI definition of wilding conifers along with amendments to Rule 3 and 5 to specify individual species covered by each rule.</p> <p>While MPI requested all listed wilding conifer species added to the progressive containment programme only Scots pine (entire region), Dwarf mountain pine (entire region), Mountain pine (entire region), European larch (entire region) be added to the progressive containment programme. These additional four species have little commercial value making the ongoing seed source from production forestry manageable. Therefore progressive containment for these species is achievable. Rule 3 requires occupiers to destroy these pests unless they are party to a progressive containment pest management agreement.</p> <p>The other wilding conifer species still have commercial value, and there are still many unknowns in terms of their actual distribution (both in a productive and wilding sense) hence the reluctance to include them without any commitment of central government funding for ongoing control. For this reason these remaining species remain in the sustained control programme. Rule 5 requires occupiers to destroy these species within 200 metres of their boundary if the adjoining occupier is also destroying those species.</p> <p>The cost of adding the four additional species (listed above) to the progressive containment programme would be minimal as these species are not yet well established.</p>		

## Regional Pest Management Plan Council Decisions by Section

### Section: Table 7 Management Regime

Submission Number:	19: 10	Submission Type:	Seek Amendment
Submitter:	Waikato Regional Council		
Submission Summary:	<p>There is no specific mention of catfish management in this table. Under service delivery, BOPRC intends to manage six species where the onus cannot be placed on occupiers to undertake control. The same could be said for catfish, since there are also no rules for catfish. This point relates to that made in #12 where it is not clear (in one page) what council is actually going to do to specifically manage catfish.</p> <p>The same argument as above could be made also for Asian paddle crab, rudd and tench – if council isn't going to undertake service delivery who is? Perch and koi carp are okay as they are covered under the eradication service delivery description in Table 5 which is clear around service delivery. Further, is it council's intention to not undertake any service delivery for sabella and styela? The way Table 7 is written and with Table 8 rules set out, this implies that BOPRC is primarily going to manage these pests through inspection/rules. This is implicit but not spelt out and may be confusing for readers. We note that BOPRC does undertake service delivery control work for sabella currently.</p> <p>Lastly, boneseed and the three aquatic pest plants are not described as either service delivery or specified in a rule. What is the management regime for these pests? It must be more than just banning them from sale under generic rules.</p>		
Decision Sought:	<p>Add catfish as a service delivery pest in Table 7.</p> <p>Add also Asian paddle crab and the named pest fish in the progressive containment programme, or state the management regime otherwise (i.e. DOC is responsible for control!).</p> <p>Clarify the management regime for two progressive containment marine pests, boneseed and three aquatic pest plants.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>Add catfish, Asian paddlecrab, perch, tench and rudd to list of pests Council will maintain control and management of in the service delivery text.</p> <p>Council is the most effective agency to undertake control and surveillance for marine pests (including sabella and styella).</p> <p>Boneseed has been added to Rule 3 (occupiers must destroy on their property unless they have a written pest management agreement)</p> <p>The management of aquatic pests plants in the Rotorua Te Arawa lakes is primarily the responsibility of LINZ on behalf of the Crown.</p>		
Submission Number:	30: 8	Submission Type:	Not Applicable
Submitter:	New Zealand Transport Agency		
Submission Summary:	Under 'Council inspection', there should be reference to 'crown entities'. For example, "Council will work with crown agencies and crown entities for the progressive containment of these species on crown owned/managed land."		
Decision Sought:	Additional reference to 'crown entities'		
Council Decision:	Accept		
Reasons:	Reference added as requested.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	30: 9	Submission Type:	Seek Amendment
Submitter:	New Zealand Transport Agency		
Submission Summary:	Under 'Monitoring' and 'indicators', there should be reference to 'crown entities'. For example, "Number of progressive containment agreements initiated (including MOU's with Crown agencies and Crown entities)."		
Decision Sought:	Additional reference to 'crown entities'		
Council Decision:	Accept in Part		
Reasons:	Reference added as requested.		

### Section: Table 8 Rules

Submission Number:	30: 11	Submission Type:	Not Applicable
Submitter:	New Zealand Transport Agency		
Submission Summary:	If the council knows where the listed pest plant species are currently found and has this data available, it would be useful for the Transport Agency to be able to access it for better pest management outcomes.		
Decision Sought:	Information sharing		
Council Decision:	Accept in Part		
Reasons:	Information sharing and focusing on pest management priorities support the intent of the MOU.		

Submission Number:	51: 26	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:			
Decision Sought:	Either include a separate rule table for all categories or include the text of the rules 6-8.		
Council Decision:	Reject		
Reasons:	This is a formatting issue. To avoid duplication the generic rules are included in RPMP once and all Programme Tables refer reader to Generic rules.		

Submission Number:	51: 28	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	The statement "Generic rules etc." should be clarified so that Rules 6-7 do apply and not relegated to an Advice Note (p61).		
Decision Sought:	Re write "Rules 6-8 apply" or include in Table 8.		
Council Decision:	Accept		
Reasons:	Reference to Rules 6-8 have been reformatted so they are not part of the advisory note		

Submission Number:	52: 15	Submission Type:	Not Applicable
Submitter:	Ministry for Primary Industries		
Submission Summary:	Does the Council have some sort of timeframe in mind for the first and third bullets? If the local marinas have adopted the "6 and 1" rule, then Council may wish to make reference to that in an explanatory note. We recognise that timeframes will differ depending on the type of vessel and their sailing history however, and including words which cover all situations might not be simple.		
Decision Sought:	Add timeframe to the rules.		
Council Decision:	Reject		
Reasons:	Council intends for these rules to be complied with once the RPMP is adopted.		



## Regional Pest Management Plan Council Decisions by Section

Section: Rule 1			
Submission Number:	12: 4	Submission Type:	Seek Amendment
Submitter:	Whakatohea Mussels		
Submission Summary:	<p>The rule is too narrow in scope and should be drafted so that any other unwanted organisms that may require future management can be captured by this rule.</p> <p>Rule also needs to capture boat movements in and out of the region's waters. Bay of Plenty Regional Council should lead by example and seek to manage the spread of pests leaving the region.</p>		
Decision Sought:	<p>Amend rule as follows:</p> <p>The owners or persons in charge of a craft moving within, into and out of Bay of Plenty waters must ensure the hull is sufficiently cleaned and antifouled so that there is no more than a slime layer.</p> <p>Delete last sentence</p>		
Council Decision:	Accept in Part		
Reasons:	<p>Amend rule to read</p> <p>The occupier in charge of a craft moving to or within Bay of Plenty waters must ensure the hull is sufficiently cleaned and antifouled so that the hull has no more than a slime layer and/or barnacles. This is to support the progressive containment of clubbed tunicate and Mediterranean fanworm.</p> <p>First sentence not deleted as the agreed template between regional councils is to state what pests the rule seeks to manage.</p>		
Submission Number:	50: 2	Submission Type:	Support
Submitter:	Auckland Council		
Submission Summary:	<p>We support the use of pathway style rules. This approach aligns with the Proposed Auckland RPMP by way of providing direction toward adopting a Marine Pest Pathway Management Plan. Auckland Council plan to continue actively participating in a collaborative manner with BOPRC and other partners of the Top of the North marine biosecurity partnership to secure an inter-regional Marine Pest Pathway Management Plan.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	<p>Support noted.</p> <p>BOPRC is a partner of the Top of the North marine biosecurity partnership and will continue to collaborate with our Top of the North partners.</p>		

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## Regional Pest Management Plan Council Decisions by Section

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Submission Number:	52: 13	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>The Rule mentions that hulls of vessels moving within the Bay of Plenty waters should have no more than a slime layer. This is a very positive move to encourage vessel owners to maintain their hulls at minimum fouling. Generally when submitting on plans, MPI has suggested that slime layer plus goose barnacles is the minimum standard – taking our cue from the Craft Risk Management Standard: Biofouling for international vessels arriving to the New Zealand border. You might consider adding goose barnacles to this rule.</p> <p>In the same rule, Council mentions craft moving within Bay of Plenty waters. Is there any thought to extending this standard to craft which come into or leave the Bay of Plenty?</p>		
Decision Sought:	Amend to “slime layer plus goose barnacles”. Consider extending to vessels entering or leaving Bay of Plenty Waters		
Council Decision:	Accept		
Reasons:	<p>Rule has been amended to read</p> <p>The owner or person in charge of a craft moving to or within Bay of Plenty waters must ensure the hull is sufficiently cleaned and antifouled so that the hull has no more than a slime layer and/or goose barnacles.</p>		

## Regional Pest Management Plan Council Decisions by Section

### Section: Table 8 Rules

Submission Number:	15: 7	Submission Type:	Seek Amendment
Submitter:	Northland Regional Council		
Submission Summary:	Council commends the rules proposed to manage biofouling and marine pest species. Vessel traffic is significant to and from BOP and rules to address the marine pest risk is a huge achievement, however we suggest the following changes to the proposed rule.		
Decision Sought:	<p>Suggest rewording the rule to the following to make the rule more enforceable.</p> <p>"The owner or person in charge of a craft moving to or within Bay of Plenty waters must ensure the hull has no more than a slime layer."</p> <p>This will ensure vessels entering the region must comply with the rule and gives vessel owners more ability to ensure they are compliant other than 'cleaning or antifouling'. This future proofs the rule for new technology and creates less ability for the rule to be argued against. Suggest also removing the sentence referring to the purpose of the rule and adding this as guidance material. Similar rules in the Northland Marine Pathway Plan have been tested in the environment court following appeals.</p>		
Council Decision:	Accept		
Reasons:	<p>Support noted.</p> <p>Rule amended to say...</p> <p>The occupier in charge of a craft moving to or within Bay of Plenty waters must ensure the hull is sufficiently cleaned and antifouled so that the hull has there is no more than a slime layer and/or barnacles.</p>		

### Section: Rule 2

Submission Number:	12: 5	Submission Type:	Seek Amendment
Submitter:	Whakatohea Mussels		
Submission Summary:	Widen scope of rule to include infrastructure and recognise pest spread can occur within Bay of Plenty waters.		
Decision Sought:	<p>Amend as follows:</p> <p>All aquaculture infrastructure, ropes and floats used within Bay of Plenty waters must not have been used outside Bay of Plenty waters or used within a known pest incursion zone within the Bay of Plenty.</p> <p>Delete last sentence</p>		
Council Decision:	Accept		
Reasons:	Accept scope of rule could be widened to include infrastructure other than ropes and floats. Amended as follows: All aquaculture equipment (including ropes and floats) used within Bay of Plenty waters must not have been used outside Bay of Plenty waters or used within a known pest incursion zone within the Bay of Plenty.		

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Submission Number:	15: 8	Submission Type:	Oppose in Part
Submitter:	Northland Regional Council		
Submission Summary:	<p>Oppose and amend to;</p> <p>All aquaculture ropes and floats used within Bay of Plenty waters must have suitable measures undertaken to ensure all marine pests are removed or rendered non-viable when entering Bay of Plenty waters."</p>		
Decision Sought:	<p>Suggest rewording the rule to the following to make the rule more enforceable.</p> <p>"All aquaculture ropes and floats used within Bay of Plenty waters must have suitable measures undertaken to ensure all marine pests are removed or rendered non-viable when entering Bay of Plenty waters."</p>		

## Regional Pest Management Plan Council Decisions by Section

	Currently the wording would mean that ANY ropes and floats used outside of the region would not bepermitted to enter the region.		
Council Decision:	Reject		
Reasons:	The intention is that no equipment used elsewhere can be used in the Bay of Plenty. This has been strongly advocated from the local aquaculture stakeholders.		
Submission Number:	50: 3	Submission Type:	Support
Submitter:	Auckland Council		
Submission Summary:	We support the use of pathway style rules. This approach aligns with the Proposed Auckland RPMP by way of providing direction toward adopting a Marine Pest Pathway Management Plan. Auckland Council plan to continue actively participating in a collaborative manner with BOPRC and other partners of the Top of the North marine biosecurity partnership to secure an inter-regional Marine Pest Pathway Management Plan.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted.  BOPRC is a partner of the Top of the North marine biosecurity partnership and will continue to collaborate with our Top of the North partners.		
Submission Number:	52: 14	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	This is a really good rule but is your intention to only include floats and ropes? If not, you could replace the words “All aquaculture ropes and floats” with the words “All aquaculture equipment e.g. ropes and floats”.  Council may wish to consider adding the words “or taken out of the region for reuse” to the sentence “All aquaculture ropes and floats used within Bay of Plenty waters must not have been used outside Bay of Plenty waters		
Decision Sought:	Replace “All aquaculture ropes and floats” with the words “All aquaculture equipment e.g. ropes and floats. Add reference to equipment taken out of Bay of Plenty waters.		
Council Decision:	Accept		
Reasons:	Rule has been amended to read:  All aquaculture equipment (including ropes and floats) used within Bay of Plenty waters must not have been used outside Bay of Plenty waters or used within a known pest incursion zone in the Bay of Plenty.		
Section: Rule 3			
Submission Number:	30: 10	Submission Type:	Seek Amendment
Submitter:	New Zealand Transport Agency		
Submission Summary:	The Transport Agency seeks clarification as to whether the property- specific Progressive Containment Pest Management Agreement includes MOU's.		
Decision Sought:	Clarification sought as to the scope of 'Progressive Containment Pest Management Agreement '		
Council Decision:	Comment noted		
Reasons:	MOUs do not exempt occupiers from rules they are bound by. Parties to an MOU are still able to have a Progressive Containment Management Agreement for the land they manage.		

## Regional Pest Management Plan Council Decisions by Section

### Section: 6.4 Sustained Control

Submission Number:	21: 10	Submission Type:	Not Applicable
Submitter:	Mawera Karetai		
Submission Summary:	I have seen people spray blackberry during plants that people eat fruiting. Kids with their families harvest the fruit. I worry about them being poisoned.		
Decision Sought:	Blackberry - Don't spray during fruiting		
Council Decision:	Reject		
Reasons:	Spraying blackberry is an operational matter outside the scope of the RPMP. Commercial operators have their own spray standards to adhere to. This rule will largely capture private land occupiers undertaking work on their own properties.		
Submission Number:	32: 5	Submission Type:	Oppose in Part
Submitter:	Heather Donald		
Submission Summary:	"Sustainable Control Programme" page 71 As noted above there is an issue with the monitoring measurement of the outcome. There is also the requirement to only inspect if there is a complaint. The requirement to act on complaint is a poor use of the public concern and of well trained staff. Also there appears to be an emphasis that the complaint is to come from a neighbour. This use of the public rather than site visits to an obvious weed infestation from a well trained Pest Plant officer will reduce the effectiveness of the site visit. It will also cause a significant reduction in the public perception of the Regional Council. In the WBOPDC area this policy of inspections based on complaint from the public has resulted in an increase in weed infestations along boundaries and within properties. Partly due to the fact that the public is not aware of the change in inspection regime and do not report infestations. In their minds the council Pest Plant Officer is just slack and hence the Regional Council is also tarred with that brush		
Decision Sought:			
Council Decision:	Reject		
Reasons:	Council might deem action required for any number of reasons of which a complaint is only one. A significant increase in infestation and elevated risk of spread are other examples provided for when action might be required.		
Submission Number:	33: 16	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that Egeria in Lakes Rotorua, Lake Rotoiti, Okareka, Tarawera, Rotomahana and Rerewhakaaitu should be managed as part of the sustained control programme.		
Decision Sought:	LINZ submits that Egeria in Lakes Rotorua, Lake Rotoiti, Okareka, Tarawera, Rotomahana and Rerewhakaaitu should be managed as part of the sustained control programme, with consequential amendments to Table 9 and Map 4.		
Council Decision:	Reject		
Reasons:	CBA determines that progressive containment of Egeria within Lakes Rotorua, Rotoiti, Okareka, Tarawera, Rerewhakaaitu and Rotomahana had greatest positive cost-benefit.		
Submission Number:	33: 17	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana should be managed as part of the sustained control programme.		
Decision Sought:	LINZ submits that Hornwort in Lakes Rotorua, Rotoiti, Rotoehu, Tarawera and Rotomahana should be managed as part of the sustained control programme, with consequential amendments to Table 9 and Map 6.		
Council Decision:	Reject		
Reasons:	CBA indicates that all programmes are positively cost beneficial. Progressive Containment of hornwort is highly cost beneficial and achievable.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	33: 18	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that Lagarosiphon in Lakes Rotorua, Rotoiti, Rotoehu, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu should be managed as part of the sustained control programme.		
Decision Sought:	LINZ submits that Lagarosiphon in Lakes Rotorua, Rotoiti, Rotoehu, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu should be managed as part of the sustained control programme, with consequential amendments to Table 9 and Map 8.		
Council Decision:	Reject		
Reasons:	CBA has determined that progressive containment of Lagarosiphon within Lakes Rotorua, Rotoiti, Rotoma, Okataina, Okareka, Tikitapu, Tarawera and Rerewhakaaitu had greatest positive cost-benefit.		

Submission Number:	33: 19	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that Elodea canadensis should be removed from sustained control, as this species is not currently targeted for control in the Rotorua lakes due to lagarosiphon, Egeria and hornwort being of higher priority.		
	While Elodea canadensis is declared a pest under the Bay of Plenty RPMP, this species is not declared an Unwanted Organism under the Biosecurity Act 1993 and is still able to be bought and sold in New Zealand.		
Decision Sought:	LINZ submits that Elodea canadensis should be removed from Te Kaupapa Pupuri Whakauka / Sustained control programme.		
Council Decision:	Reject		
Reasons:	CBA indicates strong cost-benefit for exclusion from Lake Rotomahana and sustained control in other Rotorua Lakes.		

Submission Number:	52: 17	Submission Type:	Oppose
Submitter:	Ministry for Primary Industries		
Submission Summary:	The region has 18,000 ha of infestation that poses a risk to 85,000 ha of vulnerable land. MPI urges the Council to align its Wilding Conifer Objective with the Contorta Objective (i.e. Progressive Containment). As with Contorta, Progressive Containment for Wildings would specify a reduction over a set period of time.		
	With suitable rules the Council would be signaling a commitment to protect the vulnerable land in the region from infestation and its aim to reduce the prevalence of Wildings over time.		
Decision Sought:	MPI supports Progressive Containment		
Council Decision:	Comment noted		
Reasons:	Support for Progressive containment is noted.		

### Section: Glossary

Submission Number:	27: 6	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	Wild kiwifruit needs to be controlled wherever it grows in the BOP region. The proposed Rule 5 (boundary control rule) for wild kiwifruit is unlikely to be effective and will result in increased infestations. This is because wild kiwifruit: <ul style="list-style-type: none"> <li>• Grows on the sides of steep gullies and is often not visible to the neighbouring occupier – people will not complain about a vine they don't see</li> <li>• The current collaboratively funded surveillance and control programme is effective and should not be changed. Wild kiwifruit is difficult to kill, and pro-active work undertaken by professional contractors should continue, rather than increased reliance on landowners to effectively destroy plants.</li> <li>• Any existing infestations will very likely expand and become extremely costly to control.</li> </ul>		

## Regional Pest Management Plan Council Decisions by Section

Decision Sought: Please amend to ensure wild kiwifruit is a progressive containment pest for all areas of the Bay of Plenty. Remove wild kiwifruit as a sustained control pest.

Council Decision: Accept

Reasons: Wild Kiwifruit to be managed as a progressive containment pest across the whole region (with the financial support of KVH)

In support of their submission KVH have agreed to increase industry contribution to controlling wild kiwifruit and, in addition, support surveillance costs. Staff are currently negotiating an MOU with KVH that will support a control programme of \$333,000 per annum with Council's share being 30%. Under the proposed MOU industry (i.e. KVH) have agreed to take over the management of all control work contracts and payments to contractors and cost recovery from landowners. BOPRC will continue to manage surveillance and compliance work where needed. Staff will bring the MOU to Council for formal approval. Cost-benefit analysis does not support progressive containment; however, Council considers that it is achievable with the support of industry investment in control. Applying a progressive containment regime across the region is a simpler approach than the sub-regional split currently proposed in the RPMP.

### Section: General

Submission Number: 6: 3 Submission Type: Support

Submitter: Port Blakely Forestry

Submission Summary: Port Blakely fully supports a collaborative approach to pest management across multiple properties. We appreciate the availability of Council enforcement to ensure control operations undertaken can be effective.

Decision Sought: Retain sustained control programme.

Council Decision: Comment noted

Reasons: Retain sustained control programme.

Submission Number: 10: 5 Submission Type: Seek Amendment

Submitter: Jean-Paul Thull

Submission Summary: Woolly nightshade, wild kiwifruit, Lantana, wild ginger, barberry etc. should be in the 'progressive control' category, and not the 'sustained control' category in the area north of the Wairoa river (an area that I know well). It is a no brainer to shift it to sustained control as all progress made over the years will be lost. WNS grows so quickly and from personal experience I struggle to keep on top and this mainly because neighbours do not care.

Woolly nightshade et al. were priority weeds in the Western Bay of Plenty north of the Wairoa river in recent years and should stay like this (progressive containment) to ensure all the efforts so far are not lost. The proposal puts them into the 'sustained control' category which does not make sense, considering this government is taking the environment seriously. You would just waste all efforts and funding from the past, as WNS can be found on most properties. We should put more effort into progressive containment but grouping landowners/properties and progressively containing them. Landowners are more likely to look after their land and prepared to control weeds when asked to do so, provided their neighbours do the same and some guidance and monitoring is given. Providing incentives to those who actively get on with things need to be considered (like providing financial incentives or chemicals).

I learned anecdotally from BOPRC staff that in 2015 woolly nightshade infestations in the area north of the Wairoa river where at a very manageable level, with a few exceptions. However, by 2015 staff were asked to stop surveillance for woolly nightshade (WNS) and solely focus on the worst woolly nightshade infested properties. By 2016 BOPRC staff were told to ignore woolly nightshade infestations completely, and only to respond to complaints. From 2015 to 2016 we were still making progress with the worst woolly nightshade infested properties, but since 2016 woolly nightshade infestations have notably increased, and plants visible from the road generally are older/larger. Based on this observation, I believe that we will lose the battle with woolly nightshade in this area if it stays in the 'sustained control' category as proposed under the new RPMP. The RPMP will be valid for 10 years. A lot of damage will be done in that time.

Decision Sought: We should put more effort into progressive containment but grouping landowners/properties and progressively containing them. Landowners are more likely to look after their land and prepared to control weeds when asked to do so, provided their neighbours do the same and some guidance and monitoring is given. Providing incentives to those who actively get on with things need to be considered

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(like providing financial incentives or chemicals). Rodent controls could be added to such programs.

Council Decision: Reject

Reasons: Retain sustained control status. Council might deem action required for any number of reasons of which a complaint is only one. A significant increase in infestation and elevated risk of spread are other examples provided for when action might be required. Council will look to enforce compliance in engaged communities or in strategically important areas.

Rodents are included in Appendix 1 as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.

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Submission Number: 17: 1 Submission Type: Oppose

Submitter: Angelika Stadler

Submission Summary: Page 71, 72 and maps 10, 11 and 12 Sustained control category, Rule 5 (200m boundary control...)  
/Explanation 'Council ...would only act on a complaint from a compliant neighbor.

People have always struggled with the concept of different rules regarding the same plant within the region (I'm talking about the Woolly Nightshade Exclusion Zones at Te Puna and Welcome Bay, where control of woolly nightshade is currently not enforced by the BOPRC). I believe that woolly nightshade, Kahili and wild kiwifruit should be treated the same throughout the Bay of Plenty region.

Landowners in the Bay of Plenty, north of the Wairoa river pay rates like everybody else, property prices are high, and it is generally a very popular area. There is no conceivable reason why this area should not get the same attention and funding from the BOPRC in regards to reducing pest plants, and protecting ecological and economic (tourism) values, as other areas of the Bay of Plenty. It needs to be recognized that landowners (sometimes with help of the council) have made a huge effort to get on top of woolly nightshade and wild kiwifruit. Their efforts should get the same support from the council as areas south of the Wairoa river. People should not have to make complaints about their neighbors to get this support.

Decision Sought: BOPRC to apply the same rule for a pest plant throughout the Bay of Plenty region. It is confusing for landowners when there is active surveillance for a plant that they are legally required to control in one area (Rule 3, page 61), while council staff and contractors ignore the same plant in another part of the Bay of Plenty, unless there is a complaint (Rule 5, page 72).

Council Decision: Reject

Reasons: The split programme for woolly nightshade reflects CBA results.

Sustained control requires control either if a neighbour is managing the pest or written direction is given. A need for action may be triggered by a significant increase in pest infestation and their impacts, an elevated risk of spread and or complaints from neighbours. Stating staff and contractors will ignore until a complaint is received is misleading. Council will also use other mechanisms to encourage management of these sustained control pests such as advocacy and education.

The CBA results also support a split programme for kiwifruit management. However the kiwifruit industry have supported their request for progressive containment across the region with an increased industry contribution.

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Submission Number: 17: 2 Submission Type: Oppose

Submitter: Angelika Stadler

Submission Summary: Woolly nightshade, wild kiwifruit, Lantana, and wild ginger (Kahili within 200 to 500 meters to native bush) should be in the 'progressive control' category, and not the 'sustained control' category in the area north of the Wairoa River.

Woolly nightshade, wild kiwifruit and Kahili (wild ginger) have been the priority weeds in the Western Bay of Plenty north of the Wairoa River in recent years. These pest plants would be in the 'sustained control' category in that area under the proposed RPMP. Landowners/occupiers in the area north of the Wairoa River have spent a lot of time and money on controlling those weeds. Although good climate and soil invite weed infestation,



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landowners generally look after their land, and are prepared to control weeds when asked to do so, provided their neighbors do the same.

Woolly nightshade is a highly efficient plant. It grows up to 2 meters tall within one year, and can reproduce within 6 months of germination. The leaves and roots are allelopathic, and suppress the germination of seeds of other plants. Woolly nightshade produces a lot of viable seed, which is distributed by bird. The plant affects human health, as working with the plant can cause rashes and breathing problems. I've been told by more than one landowner, that they ended up feeling quite sick after spending a few hours controlling woolly nightshade. Woolly nightshade tends to form monocultures, and can change the look of landscapes completely. This weed should not be allowed to get out of control. I strongly believe that in 2015 woolly nightshade infestations in the area north of the Wairoa River were at a very manageable level, with the exception of around four properties (outside the woolly nightshade exclusion zones).

In 2015 I've been asked to stop surveillance for woolly nightshade (WNS), and to focus only on the worst woolly nightshade infested properties. In 2016 I was told in writing to ignore woolly nightshade infestations completely, and only to respond to complaints by affected neighbors. From 2015 to 2016 we were still making progress with the worst woolly nightshade infested properties, but since 2016 woolly nightshade infestations have notably increased, and plants visible from the road generally are older/larger. Based on this observation I believe that we will lose the battle with woolly nightshade in this area if it stays in the 'sustained control' category as proposed under the new RPMP. The RPMP will be valid for 10 years. A lot of damage can be done in that time.

Wild kiwifruit infestations in the area north of the Wairoa River are generally younger/smaller than in the area around Te Puke (gullies). It would be more effective to control these plants now, and not to wait until they are well established, and hard to control. Therefore, wild kiwifruit should not be in the 'sustained control' category in this area. I have never received a complaint about wild kiwifruit. Most people would not recognize the plant in the wild.

Wild ginger is a problem where it can invade the native bush, and compete with native vegetation. It is also a problem near conservation areas. Wild ginger is distributed by bird, and can grow under low light levels. Landowners within 500m of native bush and conservation areas should be encouraged to control Kahili (wild ginger) on their land, independent from complaints from neighbors.

Lantana still occurs very localized in the area north of the Wairoa River. This plant has become a huge problem in Australia and other places overseas. With regards to increasingly warmer temperatures (climate change), Lantana should be controlled in this area, before it gets out of control.

Decision Sought: Reclassify Woolly nightshade, wild kiwifruit, lantana as Progressive Containment

Council Decision: Accept in Part

Reasons: Woolly nightshade - CBA indicates progressive containment throughout region is negatively cost-beneficial, except in some areas where distribution is low. A rule focused on boundary control at adjoining compliant properties has been included due to community will to continue investing in controlling this species.

Wild Kiwifruit - Wild kiwifruit has been reassessed and recommended for inclusion in the progressive containment programme throughout the region. Council's assessment is that progressive containment is achievable with financial support from the kiwifruit industry to offset their role as the main exacerbator.

Lantana - CBA indicates positive cost benefit for proposed management programmes split across the region.

Wild ginger - CBA determines sustained control across the region is slightly more cost beneficial than progressive containment and sustained control split. Sustained control is the preferred management programme due to the wide distribution of the pest.

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Submission Number:	54: 9	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	<p>The Department supports the boundary control component of rule 5 for the listed sustained control plant pests and agrees with the 200m from boundary distance as practical and pragmatic. The second part of Rule 5, 'control if required by a written direction....' we understand could allow for destruction of sustained control plant pest beyond the boundary distance requirement where efficient and advantageous (and fair and reasonable) to do so.</p> <p>This could include the destruction of wild ginger in parts of the region with low infestation levels.</p>		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

### Section: Table 9 Pest Descriptions

Submission Number:	52: 8	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>MPI supports establishing a consistent definition in regional pest management plans. In order to establish RPMP rules for wilding conifers, it is necessary to specify them as a pest under the RPMP. To date, this has been done in several, but not all regions, and in each case a different definition or description has been used. The Biosecurity Act 1993 (the BSA) defines a pest as "an organism specified as a pest in a pest management plan". Sections 70-73 of the BSA refer to the 'subject' of a RPMP, which may be:- an organism or organisms; or- a class or description, or classes or descriptions, of organism or organisms that are specified as a pest or pests in the RPMP. Collectively, these provisions indicate that organisms specified as pests under a RPMP may be described under a collective term (such as 'wilding conifers'). Although it is not clear whether listing the particular species covered by the collective term is required, it is arguable that for certainty, this should be done. Consequently, for the purposes of specifying wilding conifers as a pest in RPMPs, it is recommended that the particular species of concern be included in the definition/description. One of the key challenges associated with the management of wilding conifers is that while wilding conifers are a pest, planted conifers are a valuable resource. This highlights the importance of recognising the considerable value of planted and responsibly managed conifers, and clearly distinguishing these from naturally regenerated wilding conifers that can pose a threat to a range of environmental, economic, aesthetic, recreational, and other values. The proposed wilding conifer definition incorporates all ten of the most spread-prone conifer species, but specifically applies only to those trees that are naturally regenerated, rather than intentionally planted.</p>		
Decision Sought:	<p>Recommended Wilding Conifer Definition</p> <p>Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 1, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees.</p> <p>Table 1</p> <p>Common Name / (Scientific Name)</p> <ul style="list-style-type: none"> <li>- Douglas fir (<i>Pseudotsuga menziesii</i>)</li> <li>- Lodgepole or contorta pine (<i>Pinus contorta</i>)</li> <li>- Scots pine (<i>Pinus sylvestris</i>)</li> <li>- Dwarf mountain pine and mountain pine (<i>Pinus mugo</i> and <i>P. uncinata</i>)</li> <li>- Bishops pine (<i>Pinus muricata</i>)</li> <li>- Maritime pine (<i>Pinus pinaster</i>)</li> <li>- Ponderosa pine (<i>Pinus ponderosa</i>)</li> <li>- Corsican pine (<i>Pinus nigra</i>)</li> <li>- European larch (<i>Larix decidua</i>)</li> <li>- Radiata Pine (<i>Pinus radiata</i>)</li> </ul>		
Council Decision:	Accept		
Reasons:	Support MPI's intention to have standard definition in RPMPs across the country. Refer to wilding conifers definition (that lists species) in pest description.		

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### Section: General

Submission Number:	10: 4	Submission Type:	Not Applicable
Submitter:	Jean-Paul Thull		
Submission Summary:	<p>It is not a good idea to only act on a complaint from a compliant neighbour.</p> <p>Rural property owners like to do whatever they want on their property. Some owners do not care as they are waiting for values to go up prior to sell and realise the number of pest plants are not impacting on the property value. Considering many immigrants (South Africans, Germans, Swiss) live rural and used to speak their mind, it just adds to conflicts as it is not in the kiwi culture, something policy writers often ignore. Most immigrants are well educated and care about biodiversity and end up in conflict with neighbours.... Another factor to consider is the increase of tenanted rural properties, making it really difficult for the owner to look after the property and tenant not interested in removing plant pests. Therefore, I believe that the objective of 'sustained control' of pest plants of this category, as stated on page 71 to '...prevent unreasonable impacts from these pests spreading across property boundaries...' cannot be met by acting on complaints alone. There is the possibility that we would end up with large 'exclusion zones' where pest plants are barely managed with support of the BOP Regional Council, but almost solely by a few concerned landowners/occupiers. This is currently the case when looking in my area in Whakamarama.</p> <p>Furthermore, going out for a single complaint is not going to work as rural landowners rely on their neighbours for mutual support throughout the year and this proposal does not recognise the soft factors at all.</p>		
Decision Sought:	Have BOP staff working in clusters with landowners to ensure progress is happening.		
Council Decision:	Reject		
Reasons:	Retain sustained control status. Council might deem action required for any number of reasons of which a complaint is only one. A significant increase in infestation and elevated risk of spread are other examples provided for when action might be required.		

### Section: Table 11 Rules

Submission Number:	31: 10	Submission Type:	Oppose in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>In the context of Crown Agency responsibilities (or otherwise), Table 11- Rule 4 Explanation states: "These rules are not Good Neighbour rules under the Biosecurity Act and therefore do not bind the Crown."</p> <p>We submit that there should be some manner of responsibility by Crown Agencies for the reasons stated above and other rationale provided throughout this WBOPDC submission. We also submit that as an affected neighbour at some sites, and a party with covenant interests adjacent to other sites in need of pest plant management, it would be helpful to have more information on the management agreements (either existing or proposed) between BOPRC and Crown Agencies such as DOC &amp; LINZ.</p>		
Decision Sought:	Amend to place sufficient responsibilities on Crown Agencies to manage pests in their estate.		
Council Decision:	Accept in Part		
Reasons:	<p>Good neighbour rules that bind the Crown are a recent addition to the National Policy Direction. Although the intent of good neighbour rules is supported, Council proposes that there may be more benefit in negotiating agreed understandings with Crown Agencies on pest management issues rather than including good neighbour rules in our next RPMP. Section 3.4 states Council has opted to work with Crown Agencies towards agreed understanding and pest management commitment in lieu of good neighbour rules and this reflects Council's pest management strategic direction.</p> <p>Two Crown Agencies with significant pest management responsibilities in our region include NZTA and DoC. Between them they manage significant areas of land in the Bay of Plenty traversing a range of environments with a significant number of property owners adjoining managed land, with varying levels of pest management undertaken. Recognising this, Council has already agreed memoranda of understanding (MOU) with DoC and NZTA as a favourable mechanism to confirm a level of pest management commitment whilst recognising practical challenges for these agencies. KiwiRail is a Crown entity and bound by rules in the Plan. LINZ has also agreed to the intent of an MOU and works closely with BOPRC with regards to management of Aquatic pest plants.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	51: 27	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:			
Decision Sought:	Retain but include pests from Appendix 1. Include the Rules 6-8 or otherwise in a Table with all rules.		
Council Decision:	Reject		
Reasons:	Rules can not apply to pests that do not sit within a pest management programme.		

Submission Number:	51: 29	Submission Type:	Seek Amendment
Submitter:	Royal Forest & Bird		
Submission Summary:	<p>Rules for Sustained Control are unworkable. Rule 4 has a 10m boundary buffer but blackberry is spread by birds far beyond 10m and ragwort and old man's beard are spread by wind.</p> <p>Similarly Rule 5 – the 200m buffer will not be effective with all of the species except lantana because they are spread by birds far and wide or wind (wilding conifers).</p>		
Decision Sought:	Amend boundary rules		
Council Decision:	Reject		
Reasons:	The distance requirements are based on the primary seed dispersal mechanism not the only one. There must be a level of practicability in managing these pests and the rules are drafted as boundary control rules only.		

### Section: Rule 4

Submission Number:	33: 20	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that an amendment to this rule is required for consistency, and to clarify the responsibilities of occupiers on either side of property boundaries. The term 'destroy' is defined in the glossary and should be used in preference to 'control' in this rule.		
Decision Sought:	<p>LINZ submits that the following amendment is required to Rule 4:</p> <p>Occupiers must destroy these pests within 10 m of any property boundary where the adjoining occupier is also controlling destroying blackberry, old man's beard, ragwort and/or gorse within 10 m of the boundary.</p>		
Council Decision:	Accept		
Reasons:	The word controlling has been changed to destroying. Destroy is defined already. Occupiers must destroy these pests within 10 m of any property boundary where the adjoining occupier is also destroying blackberry, old man's beard, ragwort and/or gorse within 10 m of the boundary.		

### Section: Rule 5

Submission Number:	33: 21	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ submits that amendments to the wording of this rule are required for clarity and for consistency.		
Decision Sought:	<p>LINZ submits that the following amendments to Rule 5 will provide clarity and consistency, namely:</p> <p>Occupiers must destroy these pests:</p> <p>Either</p> <p>1 within 200 m of any property boundary where the adjoining occupier is also controlling destroying climbing spindle berry, lantana, woolly nightshade, wilding conifers, wild ginger and/or wild kiwifruit within 200 m of the boundary.</p> <p>Or</p> <p>2 If required by a written direction from an authorised person.</p>		

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Council Decision: Accept  
Reasons: The word controlling has been changed to destroying. Destroy is defined already.

### Section: Table 11 Rules

Submission Number: 52: 9 Submission Type: Support  
Submitter: Ministry for Primary Industries  
Submission Summary: Support  
Decision Sought: Retain  
Council Decision: Comment noted  
Reasons: Support noted

### Section: Table 12 Generic Rules

Submission Number: 28: 21 Submission Type: Oppose  
Submitter: Nautilus Contracting  
Submission Summary: It is incongruous that persons or entities can propagate and intentionally disseminate known pests, especially pests already known to have serious environmental impacts and management costs. Some plant nurseries are still propagating and advertising Taiwan cherry and other weeds for sale to the unsuspecting public. This needs to be prevented for all known significant pests specified in the RPMP, not just those listed in the Exclusion, Eradication, Progressive Control and Sustained Control programmes, but it should also include those presently listed in Appendix 1 of the RPMP.  
Decision Sought: Table 12 is generally supported in respect to the control programmes listed therein. However, I submit that these general rules should apply to all pests mentioned in the RPMP, including those listed at Appendix 1 of the RPMP.  
Council Decision: Reject  
Reasons: The NPD requires pests in an RPMP to fit within the pest management programmes and therefore the rules can not apply to pests that do not fit within a programme.

Submission Number: 31: 20 Submission Type: Oppose in Part  
Submitter: Western Bay of Plenty District Council  
Submission Summary: It is incongruous that persons or entities can propagate and intentionally disseminate known pests, especially pests already known to have serious environmental impacts and management costs. Some plant nurseries are still propagating and advertising Taiwan cherry and other weeds for sale to the unsuspecting public. This needs to be prevented for all known significant pests specified in the RPMP, not just those listed in the Exclusion, Eradication, Progressive Control and Sustained Control programmes.  
Table 12 is generally supported in respect to the control programmes listed therein. However, we submit that these generic rules should be amended to apply to all pests mentioned in the RPMP, including those listed at Appendix 1 of the RPMP.  
Decision Sought: Amend to explicitly state that these general rules apply to all pests mentioned in the RPMP, including those listed at Appendix 1 of the RPMP.  
Council Decision: Reject  
Reasons: Pests listed in Appendix 1 are not included in the RPMP as pests and therefore not subject to the rules. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.

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Sections 52 and 53 manage unwanted organisms regardless of whether they are included in this RPMP. Many of the pests listed in this Appendix are unwanted organisms. Note the National Pest Plant Accord which is managed by MPI and determines what species are available for sale nationally.

Submission Number:	49: 4	Submission Type:	Support
Submitter:	Regional Aquaculture Organisation		
Submission Summary:	Marine farming is new in the BOP and new invasive pests are likely to be identified.		
Decision Sought:	Nil although provision needs to be made for pests not yet identified in the BOP.		
Council Decision:	Accept in Part		
Reasons:	<p>Support noted.</p> <p>Any new organism incursions can be managed through the small scale eradication programme provisions in the Biosecurity Act if the risk of the species justifies intervention.</p>		
Submission Number:	50: 4	Submission Type:	Support
Submitter:	Auckland Council		
Submission Summary:	We support the use of pathway style rules. This approach aligns with the Proposed Auckland RPMP by way of providing direction toward adopting a Marine Pest Pathway Management Plan. Auckland Council plan to continue actively participating in a collaborative manner with BOPRC and other partners of the Top of the North marine biosecurity partnership to secure an inter-regional Marine Pest Pathway Management Plan.		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	<p>Support noted.</p> <p>BOPRC is a partner of the Top of the North marine biosecurity partnership and will continue to collaborate with our Top of the North partners in developing a pathway management plan to manage marine pests.</p>		
Submission Number:	52: 7	Submission Type:	Seek Amendment
Submitter:	Ministry for Primary Industries		
Submission Summary:	Amend advisory note as it appears to be a repeat of the advisory note for sustained control.		
Decision Sought:	Advisory Note (pg. 74) this is a repeat for the advisory for sustained control. It should be amended to advise that "A breach of a rule included within the Regional Pest Management Plan creates an offence under section 154N (19) of the Act."		
Council Decision:	Accept		
Reasons:	<p>Wording changed to:</p> <p>A breach of a rule included within the Regional Pest Management Plan creates an offence under section 154N (19) of the Act.</p>		
Submission Number:	52: 10	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	<p>Rule 7 refers to "aquatic pests". Rule 8 refers to "marine pests".</p> <p>There may be room for confusion over the terminology "aquatic pests" and "marine pests". MPI suggests that Council insert after the word "aquatic" the words "plants and freshwater fish pests" as used in the third paragraph of the Explanation to Rule 7, to avoid doubt.</p>		
Decision Sought:	Change rule 7 to read "aquatic plants and freshwater fish pests."		
Council Decision:	Accept		
Reasons:	<p>Wording changed to:</p> <p>To avoid the spread of freshwater fish pests and freshwater plant pests,</p>		

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### Section: Rule 6

Submission Number:	52: 4	Submission Type:	Support
Submitter:	Ministry for Primary Industries		
Submission Summary:	Support		
Decision Sought:	Retain		
Council Decision:	Comment noted		
Reasons:	Support noted		

### Section: Rule 9

Submission Number:	19: 11	Submission Type:	Seek Amendment
Submitter:	Waikato Regional Council		
Submission Summary:	Rule 9 relates to a specific rule for wilding conifer control, but is included under a generic rules section. We suggest it rather needs to relate to Table 11 and Rule 5. If this is not the intention then the difference between Rule 5 (wildings) and Rule 9 (wildings) requires greater explanation than outlined in the last part of table on page 73.		
Decision Sought:	We suggest it rather needs to relate to Table 11 and Rule 5. If this is not the intention then the difference between Rule 5 (wildings) and Rule 9 (wildings) requires greater explanation than outlined in the last part of table on page 73.		
Council Decision:	Accept in Part		
Reasons:	Council agrees Rule 9 seems misplaced however it includes management of both progressive containment and sustained control pests and therefore does not sit logically within the sustained control rules. Table 11 refers Plan users to generic rules including Rule 9 that also must be complied with.		
Submission Number:	33: 22	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports this rule but notes that there is also a risk of land becoming re-infested from seed sources on adjoining properties. It is submitted that a rule is required to manage that risk.		
Decision Sought:	LINZ submits that a rule is required to manage the risk of land cleared through control operations becoming re-infested from adjoining seed sources, namely: Occupiers shall destroy all wilding conifers present on land they occupy within 200 m of an adjoining property boundary prior to cone bearing if:  a. Wilding conifers have previously been cleared on the adjoining property through publicly funded control operations; and b. The owner and/or occupier of the adjoining property is taking reasonable steps to destroy wilding conifers on their land prior to cone bearing within 200 m of the boundary.		
Council Decision:	Reject		
Reasons:	Rules 3 and 5 already address the management of wilding conifers. This rule is specific to land where conifer control has already taken place using public funds.		
Submission Number:	52: 5	Submission Type:	Support in Part

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Ministry for Primary Industries
Submission Summary:	Rule 9 ensures that new infestations of wilding conifers are prevented at sites where wilding conifers have previously been destroyed through publicly funded control operations. The expectation is that funding is accepted with a level of occupier responsibility for future 'maintenance' control.
Decision Sought:	Clarify that enforcement will be on a complaints basis, e.g.: The rule will be administered by the Council and any action pertaining to non-compliance will only be initiated upon the receipt of a written complaint from an adjacent or nearby land occupier.  This rule is also confusing as it is listed under generic pests but is a specific rule regarding wilding conifers. We recommend moving this to the sustained control pests section.
Council Decision:	Accept
Reasons:	Following sentence added to explanation of Rule 9.  The rule will be administered by the Council and any action pertaining to non-compliance will only be initiated upon the receipt of a written complaint from an adjacent or nearby land occupier.

### Section: New

Submission Number:	5: 14	Submission Type:	Seek Amendment
Submitter:	Lakes Water Quality Society		
Submission Summary:	<p>To meet the stated purpose of the RPMP, the RPS, the Biosecurity Act and your relationship with Maori an additional rule is required.</p> <p>There are examples of restricted boat movement types rules in NZ. Without regulation, the general public will not assist in adequate numbers to prevent the spread of pests - as has been shown in the case of the lakes. The proposed addition will</p> <p>ensure the engagement of all public utilising boats of any category could be undertaken through an app and/or website in a self certifying process could be easily monitored by wardens or the like would need to be subject to fines, preferably instant for minor offending Substantial funding will be required to contain and eliminate pests.</p>		
Decision Sought:	<p>Add new provision to rule 7 ...</p> <p>That every boat entering any of the Rotorua Lakes be required to certify that the skipper has checked, flushed, drained and cleaned his boat, trailer and associated gear.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>The following amendments will be made to incorporate a clean boat self-certification component:</p> <p>To avoid the spread of freshwater fish pests and freshwater plant aquatic pests, the following provisions apply:</p> <ol style="list-style-type: none"> <li>1. No person shall leave boat trailers in any water body other than for the purposes of launching and/or retrieving boats.</li> <li>2. No person shall transport ballast water from any water body to any other location.</li> <li>3. All owners occupiers of vessels or craft entering any water body within the Bay of Plenty shall ensure their vessels or craft (including trailers) are free from freshwater pest fish and freshwater pest plants lake weed including fragments.</li> <li>4. All occupiers of vessels or craft using a boat ramp with a self-certification checkpoint must complete the supplied certification form and display it in the vehicle used to launch the boat</li> </ol> <p>Self-certification checkpoint has been defined to mean</p> <p>Checkpoints at boat ramps that supply a paper form to be filled in and signed by the occupier (skipper) before a boat is launched. These paper forms require the occupier to certify:</p> <p>(a) the vessel was clear of freshwater plant fragments and any fragments removed at the boat ramp were disposed of using bins if bins are provided</p> <p>(b) any water on the vessel (including ballast, bilge and water in the anchor bay) was drained before the vessel was launched and this draining process was undertaken as far away from the lake as possible</p>		



## Regional Pest Management Plan Council Decisions by Section

### Section: 7 Monitoring

Submission Number:	15: 9	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Generally support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	28: 22	Submission Type:	Support in Part
Submitter:	Nautilus Contracting		
Submission Summary:	Generally supported; however, there also needs to be a mechanism for recording observations and trends in respect to pests which are not listed in the exclusion, eradication, progressive containment or sustained control programmes but which are clearly recognised as problem pests by BOPRC and key interest groups (e.g. those pests listed at Appendix 1 of the RPMP).		
Decision Sought:	Have mechanism in the RPMP to effectively records observations and trends in respect to notable pests which are not listed in the exclusion, eradication, progressive containment or sustained control programmes.		
Council Decision:	Accept		
Reasons:	BOPRC has a mechanism whereby all queries/complaints/additional information regarding pests in our region are logged and this informs Council when they are making pest management decisions including where to focus their efforts.		
Submission Number:	28: 23	Submission Type:	Support in Part
Submitter:	Nautilus Contracting		
Submission Summary:	<p>1. I request a copy of the draft Operational Plan that BOPRC intends will be used to implement the RPMP.</p> <p>2. To ensure useful information is not lost and to help create a more complete picture of pest management issues over time I also submit that clause (e) should include the words: "as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups", so that it reads:</p> <p>"(e) maintain up-to-date databases of complaints, pest levels and densities, and responses from Regional Council and land owners and/or occupiers as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups."</p>		
Decision Sought:	For action to be taken in action is accordance with the accompanying rationale.		
Council Decision:	Accept		
Reasons:	<p>Addition added:</p> <p>(e) maintain up-to-date databases of complaints, pest levels and densities, and responses from Regional Council and landowners and/or occupiers as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups.</p> <p>This is not limited to RPMP pests.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 24	Submission Type:	Support
Submitter:	Nautilus Contracting		
Submission Summary:	Support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	31: 21	Submission Type:	Support in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	This section is generally supported; however, there also needs to be a mechanism for recording observations and trends in respect to pests which are not listed in the exclusion, eradication, progressive containment or sustained control programmes but which are clearly recognised as problem pests by BOPRC and key interest groups (e.g. those pests listed at Appendix 1 of the RPMP).		
Decision Sought:	Amend to allow for the monitoring and recording of trends relating to non-RPMP pests.		
Council Decision:	Accept in Part		
Reasons:	<p>7.2e has been amended to read:</p> <p>(e) maintain up-to-date databases of complaints, pest levels and densities, and responses from Regional Council and land owners landowners and/or occupiers as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups.</p> <p>This is not limited to RPMP pests only.</p>		
Submission Number:	31: 22	Submission Type:	Support in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>To ensure useful information is not lost and to help create a more complete picture of pest management issues over time we also submit that clause (e) should include the words: "as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups".</p> <p>WBOPDC also requests a copy of the draft Operational Plan that BOPRC intends will be used to implement the RPMP</p>		
Decision Sought:	Amend 7.2.e to read: "(e) maintain up-to- date databases of complaints, pest levels and densities, and responses from Regional Council and land owners and/or occupiers as well as information or complaints received from neighbours, iwi, stakeholders, industry, lead agencies and key interest groups."		
Council Decision:	Accept		
Reasons:	Amended as requested		
Submission Number:	54: 4	Submission Type:	Support in Part

## Regional Pest Management Plan Council Decisions by Section

Submitter:	Department of Conservation
Submission Summary:	The Department is able to provide information which is likely to assist with monitoring progress towards achievement of RPMP objectives. This may come in the form of knowledge such as pest densities, distribution, ecological impacts. We anticipate that sharing this information will best be achieved through our engagement in accordance with the MOU dated 17 August 2018. Additionally, I would encourage Council staff to make direct contact with the respective Operations Managers for the Tauranga-Rotorua District and the Whakatane-Whirinaki-Opotiki District to seek input. Through further collaboration, we may identify additional ways to share information in a manner that provides effective monitoring of pest densities and distribution. The Department would welcome access to monitoring information that would further our understanding of pest distribution and density.
Decision Sought:	We anticipate that sharing this information will best be achieved through our engagement in accordance with the MOU dated 17 August 2018. Additionally, I would encourage Council staff to make direct contact with the respective Operations Managers for the Tauranga-Rotorua District and the Whakatane-Whirinaki-Opotiki District to seek input. Through further collaboration, we may identify additional ways to share information in a manner that provides effective monitoring of pest densities and distribution. The Department would welcome access to monitoring information that would further our understanding of pest distribution and density.
Council Decision:	Comment noted
Reasons:	Support noted and agree further collaboration will occur through MOU processes.

### Section: 8 Procedures

Submission Number:	15: 10	Submission Type:	Seek Amendment
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Submitter:	Northland Regional Council
Submission Summary:	Generally, support however suggest the inclusion of more provisions
Decision Sought:	Include the following provisions: s43 and s78.  Error in quoting s98 in section 8.3 'power to issue exemptions to plan rules' as this relates to pathway plans.
Council Decision:	Accept
Reasons:	Correction made and additional sections added to powers conferred.

Submission Number:	15: 11	Submission Type:	Support
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Submitter:	Northland Regional Council
Submission Summary:	Generally support funding
Decision Sought:	
Council Decision:	Comment noted
Reasons:	Support noted

Submission Number:	19: 12	Submission Type:	Seek Amendment
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Submitter:	Waikato Regional Council
Submission Summary:	WRC notes that exemption provisions in the Act are not used widely enough across the country, and suggest that the full requirements of section 78 (not section 98 as listed, that's for pathway plans) of the BSA should be listed here, so readers can be quite clear on what grounds they can seek an exemption to a rule.  We note that they are listed in the glossary page 98 in full, but we question whether this hides them away from full view to readers.
Decision Sought:	As outlined in comments, change s98 to s78 and copy and paste from the Act the relevant sections/bullet point criteria AND include the requirements in full in council operating procedures, OR make a clear link to 'see exemption definition in glossary'.

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## Regional Pest Management Plan Council Decisions by Section

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Council Decision:	Accept		
Reasons:	Section 78 has been added to Powers conferred with a link to the exemption definition in the glossary.		
Submission Number:	28: 25	Submission Type:	Support
Submitter:	Nautilus Contracting		
Submission Summary:	Support		
Decision Sought:	Support noted		
Council Decision:	Comment noted		
Reasons:			

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	28: 26	Submission Type:	Support
Submitter:	Nautilus Contracting		
Submission Summary:	The RPMP states: "Bay of Plenty Regional Council will keep and maintain a register that records the number and nature of exemptions granted. The public will be able to inspect this register during business hours." ss.78(7)(b) & 98(9)(b) of the Biosecurity Act provides for this record to also be freely available to the public by way of BOPRC's Internet site. This is a far more readily available mechanism for the public to determine the presence or otherwise of any exemption that may impact upon them.		
Decision Sought:	I submit that this public record should be freely available on BOPRC's website and I seek a decision to this effect.		
Council Decision:	Accept		
Reasons:	We can ensure the register showing any exemptions granted is also available on our website.		

Submission Number:	31: 23	Submission Type:	Neutral
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	S.78(7)(b) & 98(9)(b) of the Biosecurity Act provides for this record to also be freely available to the public by way of BOPRC's Internet site. This is a far more readily available mechanism for the public to determine the presence or otherwise of any exemption that may impact upon them.		
	We submit that this public record should be freely available of BOPRC's website.		
Decision Sought:	Amend to allow for the public record of exemptions to be made available online		
Council Decision:	Accept		
Reasons:	Public record of exemptions can be made available online.		

### Section: Maps

Submission Number:	15: 12	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		

Submission Number:	51: 33	Submission Type:	Support in Part
Submitter:	Royal Forest & Bird		
Submission Summary:	The spatial approach to pest category is supported in principle but Forest and Bird queries whether the boundaries are clear for landowners?		
Decision Sought:	Make available maps where the boundaries can be determined by property owners.		
Council Decision:	Accept		
Reasons:	Council is working to make interactive maps available online so property owners know which pest programme their property sits within.		

## Regional Pest Management Plan Council Decisions by Section

### Section: Glossary

Submission Number:	15: 13	Submission Type:	Support
Submitter:	Northland Regional Council		
Submission Summary:	Support		
Decision Sought:			
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	27: 7	Submission Type:	Oppose
Submitter:	Kiwifruit Vine Health (KVH) & New Zealand Kiwifruit Growers Inc (NZKGI)		
Submission Summary:	A definition must remain in the RPMP to differentiate wild kiwifruit from domestically or commercially grown plants.		
Decision Sought:	Please add a definition for wild kiwifruit in the Glossary. The definition should be: "Any unmanaged plant material, self-propagated or abandoned plant of the Actinidia genus on private or public land".		
Council Decision:	Accept		
Reasons:	Definition added as requested.		
Submission Number:	33: 23	Submission Type:	Seek Amendment
Submitter:	Land Information New Zealand (LINZ)		
Submission Summary:	LINZ supports the definition of 'wilding conifer' in the glossary, and the related table of wilding conifers		
Decision Sought:	LINZ supports the definition of 'wilding conifer' in the glossary, and the related table of wilding conifers.		
Council Decision:	Comment noted		
Reasons:	Support noted.		
Submission Number:	51: 34	Submission Type:	Support
Submitter:	Royal Forest & Bird		
Submission Summary:	The definitions are clear and correct to our knowledge.		
Decision Sought:	Retain		
Council Decision:	Comment noted		
Reasons:	Support noted		
Submission Number:	52: 6	Submission Type:	Support in Part
Submitter:	Ministry for Primary Industries		
Submission Summary:	Aquatic Pests: If Council accepts the point made pest fish" so that it reads "freshwater fish pests". above (Rule 7 and Rule 8) then we suggest adding the word "freshwater" to the words		
Decision Sought:			
Council Decision:	Accept in Part		
Reasons:	'Freshwater' added to rule 7. Rule 8 is specific to marine pests only.		

## Regional Pest Management Plan Council Decisions by Section

### Section: Appendix 1: Non RPMP pests

Submission Number:	4: 5	Submission Type:	Oppose
Submitter:	Martin and Jane Munro		
Submission Summary:	Blue Morning Glory grows quickly and smothers all plants. It is highly invasive.		
Decision Sought:	Recategorise Blue Morning Glory and incorporate into RPMP.		
Council Decision:	Reject		
Reasons:	<p>CBA has determined that inclusion of Blue Morning Glory in the RPMP management programmes is not cost beneficial.</p> <p>Blue Morning Glory is included as an Advisory Pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	8: 1	Submission Type:	Seek Amendment
Submitter:	Maketu Ongatoro Wetland Society		
Submission Summary:	<p>Pampas is a serious, invasive and exclusive pest plant, however it has recently become evident that it also poses an economic cost to the kiwifruit industry. It flowers in late summer and early autumn, just as kiwifruit are maturing and the fluff from the seedheads attaches itself to the kiwifruit. I am advised that at least one shipment of kiwifruit was returned from Australia, due to it being contaminated with pampas fluff. Currently I understand that fluff has to be cleaned off individual kiwifruit at a significant cost to the industry. See submission 8.2</p>		
Decision Sought:	<p>Request the inclusion of pampas as a Pest Species, under either sustained control or progressive containment.</p> <p>It is relatively easy to control pampas, but the knowledge is not in the horticultural community. Zespri classifies Toetoe and Pampas as a single species! See submission 8.2</p>		
Council Decision:	Reject		
Reasons:	<p>CBA has determined that management under most scenarios were not cost beneficial. Pampas is common around the region so would have a high cost to manage. The greatest benefit results from managing pampas as a non-RPMP pest (now named Advisory pest in Appendix 1). Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	11: 6	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	<p>Page 105 – Non RPMP. Agapanthus. I read it as “particularly invasive in the coastal environment out competing native coastal plants”. Question? Should we collectively not do all that is proactively to enhance and “grow the beach”. Storms move the sand out to sea but over time, with good native plants and the wind it can be captured. With the probability of sea level rise, should this not be a Priority of Care? Coastal Banksia also is a high risk tree/shrub in the sand hill situation. Both these are situation dependent, being possibly a nuisance or an unacceptable risk on the coast? See submission 11.7</p>		
Decision Sought:	Consider agapanthus and coastal banksia for inclusion		
Council Decision:	Accept in Part		
Reasons:	<p>Although the CBA did not support agapanthus and coastal banksia for inclusion in the RPMP, Council agrees they should be included in Appendix 1 as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	11: 8	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	Page 115 – Grey Willow and Page 113 – Crack Willow Care of our streams and rivers – willows can be good if managed and controlled. However, willows left without care can cause blockage, flooding and structural changes in waterways.		
Decision Sought:	Question? Should we collectively take ownership of our streams and rivers and manage/control to reduce bank erosion and protect property. Yes!		
Council Decision:	Reject		
Reasons:	Council considers willow management is better suited to non-RPMP management approaches. Rivers and Drainage within BOPRC manage willows for land management and flood risk purposes.		
Submission Number:	11: 9	Submission Type:	Neutral
Submitter:	Ian Noble		
Submission Summary:	Salt Water Paspallum – I well remember the very strong presentation by Waikato to Regional Council where judgement is correct.		
Decision Sought:			
Council Decision:	Accept in Part		
Reasons:	Although the CBA did not support saltwater paspallum for inclusion in the RPMP, Council agrees it should be included in Appendix 1 as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.		
Submission Number:	11: 10	Submission Type:	Seek Amendment
Submitter:	Ian Noble		
Submission Summary:	Taiwanese Cherry - Page 127. This is spreading and becoming very dominant in bush areas, even where there is a closed canopy.		
Decision Sought:	Reassess Taiwanese cherry and consider it for inclusion. See submission 11.11		
Council Decision:	Reject		
Reasons:	CBA has determined that inclusion of Taiwanese Cherry in the RPMP management programmes is not cost-beneficial. It is included as an advisory pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.  It is recommended that Taiwanese Cherry be managed under our site-led approach to manage high value sites such as Environmental Programmes and Coast Care.		
Submission Number:	19: 4	Submission Type:	Seek Amendment
Submitter:	Waikato Regional Council		
Submission Summary:	In terms of consistency with current Waikato RPMP objectives, we note that there are some potential mismatches regarding different pest statuses between our regions. We understand that there are going to be regional differences in plant densities (for example) but also contend that for consistency both our regions could be more aligned – e.g. Exclusion and Eradication pests in the Waikato region include: marshwort, cathedral bells, giant knotweed, mile-a-minute but are deemed non-RPMP pests in the BOP region. The same applies to chocolate vine and Chilean rhubarb (as progressive containment pests in Waikato). Also, the reverse may hold true for BOPRC, there will be pests you want to see included in our review of RPMP that are not currently listed (such as stout bamboo grass potentially). We look forward to those discussions accordingly.		
Decision Sought:	Consider inclusion of the six pests noted and underlined at left, in the proposed RPMP.		



## Regional Pest Management Plan Council Decisions by Section

Council Decision:	Accept in Part		
Reasons:	<p>Marshwort – CBA suggests management is not cost-beneficial but as it is not present in our region, Marshwort will be included as an exclusion pest.</p> <p>CBA's for Cathedral bells, Giant knotweed, Mile a minute, Chocolate Vine and Chilean rhubarb suggest management is not cost-beneficial. It is recommended that the pest be managed under our site-led approach to protect high value sites such as Environmental Programmes and Coast Care.</p> <p>The species listed (apart from Marshwort which has now been included in the RPMP) are included as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	28: 27	Submission Type:	Oppose in Part
Submitter:	Nautilus Contracting		
Submission Summary:	<p>The Strategic Direction of the RPMP includes provision for pest management education and advice on the management of pests (both RPMP and non-RPMP). It has been the experience of WBOPDC, particularly respecting covenanted Protection Area monitoring and compliance, that many landowners have the perception an organism is not a pest unless it is specified as such in the RPMP. Whilst that perception is clearly not reality, nonetheless it sometimes creates landowner confusion and a measure of resentment or frustration when landowners are compelled to comply with a protection covenant when they hold to a view that because an organism is not in the RPMP it isn't a pest threat. It is important for BOPRC to appreciate a number of landowners view the RPMP in this fashion.</p>		
Decision Sought:	<p>I submit that:</p> <p>(i) The term "Non- RPMP pests" incorrectly gives a diminished perception of the significant threats that many organisms in this table present; accordingly, the descriptor for these pests should be changed to reflect their true impact to the region.</p> <p>(ii)Appendix 1, as presented in the RPMP, pays lip- service to the environmental threats from, and community concerns for, the organisms listed therein. Without action statements for control of these pests it serves no more than mild education or acknowledgement that those threats exist. This approach lacks transparent justification and is not an efficient or effective pest management methodology.</p> <p>(iii) All organisms in this table should be included in the body of the RPMP .</p>		
Council Decision:	Accept in Part		
Reasons:	<p>Non-RPMP pests have been named Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p> <p>Council regularly provides advice on these pests and may consider managing these pests through its site led approach. Council will also continue to protect high value sites through its biodiversity programme. Text to this effect has been added to the RPMP.</p>		
Submission Number:	29: 4	Submission Type:	Oppose
Submitter:	Federated Farmers		
Submission Summary:	<p>Tutsan is fast gaining the reputation as the 'new gorse' in the Central North Island. FFNZ considers that tutsan should be included in the Plan. We seek the engagement of the Council in the establishment of biocontrol programmes, including sourcing funding, initiating research and working with community groups to assist in controlling the weed. It is noted that tutsan is a difficult weed to control.</p> <p>Estimates on the cost of controlling tutsan vary between \$10,000 and \$30,000 per annum per farm in the Central North Island. These costs vary depending on farm location and how close to a river or forest the farm is. One farmer has spent \$100,000 trying to get pasture back from tutsan infestation. These figures do not include the loss of productive capability of land infested with tutsan and will vary according to farm type and typography.</p> <p>Accordingly we recommend that it be included as exclusion pests</p>		
Decision Sought:	Include Tutsan ( <i>Hypericum_androsaemum</i> ) as an exclusion pest.		
Council Decision:	Accept in Part		

## Regional Pest Management Plan Council Decisions by Section

Reasons:	<p>CBA indicates that inclusion in the RPMP management programme is not cost-beneficial. It is recommended that the pest be managed under site-led programme such as Environmental Programmes and Coast Care</p> <p>Tutsan has been added to Appendix 1 as an Advisory pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	31: 24	Submission Type:	Oppose in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>We seek to see Taiwan Cherry, Climbing Asparagus, Mignonette vine, Jasmine, and Pampas reconsidered for inclusion in the RPMP proper.</p> <p>A small list of plant pests that present a very high ecological and natural character threat, and which are currently in the Restricted Pest list of the Operative RPMP, are now relegated to Non-RPMP pests in Appendix 1. Those species are listed following, and their characteristics are briefly detailed to give an appreciation of the cumulative consequence of underrating their impact upon the Bay of Plenty's natural environment.</p> <p>Importantly, the cumulative effect of these pest plants is that, left unchecked, they would progressively dominate and completely transform tracts of our regenerating forests and riparian margins, along with their ecological, cultural and natural character values; especially when stacked up alongside other recognised pest plants.</p> <p>We submit that these pest species should be included within Table 1 of the RPMP, rather than in Appendix 1. We understand that the Biosecurity Act s.70(2)(c)(vii) requires a cost/benefit analysis, but we also submit that, per s.71(e) of the Act, the medium-term costs of inaction will outweigh the cost of including these as RPMP pests.</p> <p>We further submit that Mignonette Vine should be listed as a Progressive Containment Programme Pest within Table 6, being subject to Rule 3 of the RPMP, and the other five above-named species should be listed as Sustained Control Programme Pests within Table 9 being subject to Rule 5 of the RPMP.</p>		
Decision Sought:	<p>We seek to see Taiwan Cherry, Climbing Asparagus, Moth-plant Mignonette vine, Jasmine and Pampas reconsidered for inclusion in the RPMP proper.</p> <p>That Mignonette Vine should be listed as a Progressive Containment Programme Pest within Table 6.</p> <p>That Taiwan Cherry, Climbing Asparagus, Moth-plant, Jasmine and Pampas be listed as Sustained Control Programme Pests within Table 9.</p>		
Council Decision:	Accept in Part		
Reasons:	<p>Climbing asparagus – Included as sustained control pest. The CBA results for progressive containment are slightly more positive, however Council's assessment is that progressive containment is not achievable.</p> <p>Jasmine, Mignonette vine, Pampas, Moth Plant and Taiwanese cherry – CBA has determined that inclusion of these species in the RPMP management programmes is negatively cost-beneficial. It is recommended that these pests be managed under site-led programmes such as environmental programmes and coast care. These pests are included in Appendix 1 as Advisory pests. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.</p>		
Submission Number:	31: 25	Submission Type:	Oppose in Part
Submitter:	Western Bay of Plenty District Council		
Submission Summary:	<p>WBOPDC takes a firm stance on the reduction in priority of any pests, compare to the current operative plan. We are disappointed to see sydney golden wattle move to a non-RPMP pest in the proposed RPMP.</p> <p>Sydney golden wattle's (<i>Acacia longifolia</i>) environmental impact is recognised in appendix 1 and is one of the few species not included in the body of the proposed RPMP to have had a light CBA undertaken on it. We do not agree that it should become a non-RPMP pest. We have seen an increase of incursion in the roading network, and are actively working to control its spread. The reduction in priority given to</p>		

## Regional Pest Management Plan Council Decisions by Section

this species through the proposed RPMP will undo this work and will see the species spread unchecked in a much more aggressive manner. This is of particular concern given how well established it may become in a short period of time.

We urge BOPRC to include it in the Sustained Control Programme.

Decision Sought: That sydney golden wattle be listed as Sustained Control Programme Pests within Table 9.

Council Decision: Accept in Part

Reasons: CBA has determined that inclusion of Sydney golden wattle in the RPMP management programmes is not cost-beneficial. It is recommended that these pests be managed under site-led programmes such as Environmental Programmes and Coast Care.

It has been added to Appendix 1 as an Advisory pest. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.

Submission Number: 31: 27 Submission Type: Oppose in Part

Submitter: Western Bay of Plenty District Council

Submission Summary: The Strategic Direction of the RPMP includes provision for pest management education and advice on the management of pests (both RPMP and non-RPMP). It has been the experience of WBOPDC, particularly respecting covenanted Protection Area monitoring and compliance, that many landowners have the perception an organism is not a pest unless it is specified as such in the RPMP. Whilst that perception is clearly not reality, nonetheless it sometimes creates landowner confusion and a measure of resentment or frustration when landowners are compelled to comply with a protection covenant when they hold to a view that because an organism is not in the RPMP it isn't a pest threat. It is important for BOPRC to appreciate a number of landowners view the RPMP in this fashion.

The term "Non-RPMP pests" incorrectly gives a diminished perception of the significant threats that many organisms in this table present; accordingly, the descriptor for these pests should be changed to reflect their true impact to the region.

Appendix 1, as presented in the RPMP, pays lip-service to the environmental threats from, and community concerns for, the organisms listed therein. Without action statements for control of these pests it serves no more than mild education or acknowledgement that those threats exist. This approach lacks transparent justification and is not an efficient or effective pest management methodology.

We again request that all these pests be reconsidered through a thorough cost benefit analysis for inclusion in the body of the RPMP.

Decision Sought: That the term "Non-RPMP pests" be replaced with "Other Regional Pest Species" or words to a similar effect.

That action statements be included in the body of the RPMP to outline how these pests will be controlled.

That all these pests be reconsidered through a thorough cost benefit analysis for inclusion in the body of the RPMP.

Council Decision: Accept in Part

Reasons: Appendix 1 has been renamed Advisory pests. These pests have had CBAs undertaken and the result do not support them being included in the RPMP under the plant pest programmes. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP. Text has been added to clarify this in Appendix 1.

A new appendix has been added showing how we are currently delivering the Strategic Direction. How we continue to align with our strategic direction will be reported in our annual reports.

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	34: 1	Submission Type:	Oppose
Submitter:	marcus.girvan@boffamiskell.co.nz		
Submission Summary:	Perhaps the BOPRC can consider taking a monitoring role with the other strategic partners that are involved in assisting get rid of these pests i.e. Predator Free NZ as I think a regional approach alongside other pest management control gives the overall picture of how well we are doing or not.		
Decision Sought:	I understand its probably a financial decision, but in order to save our forests from further degradation, we need to focus on eradication of these pests.		
Council Decision:	Accept in Part		
Reasons:	Eradication over the life time of this plan is not a feasible goal for these pests. Council proposes to continue its education and advice role to manage these pests and in some cases they may be managed through a site led approach. Working with other agencies with a role in pest management sits within BOPRC's strategic direction.		
Submission Number:	35: 2	Submission Type:	Seek Amendment
Submitter:	QEII National Trust		
Submission Summary:	The description in the Plan of Moth plant growing to 10m is wrong. In an orchard near Maketu moth plant grew to the top of 40 year old man pines while the trunks of the moth plants were as fat as your calves, pers com Simon Cram, Seeka Orchard manager. Seeding is prolific, for example the Te Puke Golf Course can be blanketed white with fairy down seed from the casuarina hedge opposite on SH2. Germination is also prolific and my experience is seeds last more than a decade. My conclusion is moth plant is a threat to mature bush canopy, and will threaten native plantings in perpetuity. Moth plant needs more attention. Has the horse bolted? ... it could get a lot worse.		
Decision Sought:	Moth plant needs more attention.		
Council Decision:	Accept in Part		
Reasons:	CBA has determined that inclusion of Moth Plant in the RPMP management programmes is not cost-beneficial.  It is recommended that Moth Plant be managed under our site-led approach to manage high value sites.  Mothplant is included as an Advisory pest in Appendix 1 of the RPMP. Advisory pests are still intended to be managed as part of the region's wider biosecurity framework. Rules in regional and district plans and provisions in land management agreements that refer to pests specified or listed in the RPMP (or preceding versions of the same) apply to Advisory pests included in Appendix 1 as well as the other pests directly managed under this RPMP.		
Submission Number:	51: 35	Submission Type:	Oppose
Submitter:	Royal Forest & Bird		
Submission Summary:	While some of these pests are listed in Appendix 1, that section of the plan appears to be of uncertain legal status: There are many further organisms capable of causing some adverse effects that are not included in the Proposed RPMP. Reasons for this may be those pests are managed by another agency or they are now so widely established regional intervention (e.g. requiring pest removal) would not be practicable or affordable.  While the Biosecurity Act has requirements for pests that are included in an RPMP, there are many other organisms that Council and the community consider as pests (see Appendix 1). These pests are not included in the pest programmes nor do they have "pest" rules. However, Council considers these 'pests' are to still be part of the biosecurity framework and Council will continue to provide management advice as part of its pest management strategic direction. P21 [our emphasis]		
Decision Sought:	Incorporate into plan as outlined above		
Council Decision:	Accept in Part		
Reasons:	Following text has been added for clarification  External jurisdictions such as RMA permitted activity conditions and land management agreements include provisions that require or enable pests referred to in the RPMP to be managed. Pests included in Appendix 1 are subject to these provisions.		

## Regional Pest Management Plan Council Decisions by Section

Submission Number:	54: 11	Submission Type:	Support
Submitter:	Department of Conservation		
Submission Summary:	<p>The Department is concerned that the symbolism of listing these pests as non-RPMP pests may reduce the perceived risk of these pests in the eyes of the public. This concern has recently been raised by a community stakeholder.</p> <p>It is our understanding that the reclassification of the 'Restricted Pests' under the current plan, largely to 'non-RPMP Pests' under the proposed plan, will not change Council investment in managing these species. Council investment will continue to predominantly be provision of advice and education on these pests. Confirmation of this when we next meet would be appreciated.</p> <p>The Department is concerned that by removing restricted pests and listing them as non-RPMP species that it will reduce the Council's capability to enforce regulations pertaining to these pests in resource consents.</p>		
Decision Sought:			
Council Decision:	Accept in Part		
Reasons:	<p>Non RPMP pests have been renamed Advisory pests to help convey message that they are still recognised pests that Council will provide advice on their management.</p> <p>However wording has been further clarified in section 4 and Appendix 1 that recognises rules in regional plans and provisions in land management agreements that refer to pests specified or listed in the RPMP apply to Advisory pests included in Appendix 1 as well as other pests directly managed under this RPMP.</p>		
Submission Number:	54: 46	Submission Type:	Seek Amendment
Submitter:	Department of Conservation		
Submission Summary:	<p>Other species recommended for inclusion as non-RPMP pests (as it currently stands), or as 'Restricted Pests', whatever the case may be following review of submissions: The following species have been listed in the Bay of Plenty Plant Me Instead booklet. Consistency between the Plant Me Instead booklet and the Regional Pest Management Plan is recommended. Consistency in messaging to the public that these species are of concern in the BOP is important.</p> <ul style="list-style-type: none"> <li>- Bears breeches</li> <li>- Mexican daisy</li> <li>- Canna lily</li> <li>- Montbretia</li> <li>- Himalayan fairy grass</li> <li>- Palm grass</li> <li>- Buddleia</li> <li>- Himalayan honeysuckle</li> <li>Hydrangea</li> <li>- False acacia</li> <li>- Jasmine</li> <li>- Phoenix palms</li> <li>- Male fern</li> <li>- Rice paper plant</li> <li>- Reed sweet grass</li> <li>- Yucca</li> <li>- Mouse ear hawkweed</li> </ul>		
Decision Sought:	<p>Consider the following for inclusion</p> <ul style="list-style-type: none"> <li>Bears breeches</li> <li>- Mexican daisy</li> <li>- Canna lily</li> <li>- Montbretia</li> <li>- Himalayan fairy grass</li> <li>- Palm grass</li> <li>- Buddleia</li> <li>- Himalayan honeysuckle</li> <li>Hydrangea</li> <li>- False acacia</li> <li>- Jasmine</li> <li>- Phoenix palms</li> <li>- Male fern</li> </ul>		

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## Regional Pest Management Plan Council Decisions by Section

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- Rice paper plant
- Reed sweet grass
- Yucca
- Mouse ear hawkweed

Council Decision:

Accept in Part

Reasons:

Reed sweet grass has been included as a Sustained Control pest.

The following have been listed as Advisory pests, Bear's breeches, Canna lily, Himalayan Fairy Grass, Mexican Daisy, Montbretia, Palm grass, Buddleia, Himalayan honeysuckle, False acacia, Jasmine, Phoenix Palms Male fern, Rice paper plant and Mouse ear hawkweed.

Hydrangea and Yucca have not been added as they are still available for sale and common garden plants. They are not considered highly invasive.