

Taranaki Regional Council decisions report on

Proposal to amend the Regional Pest Management Plan

Publication date: February 2021

Document: #2712012



Table of contents

Summary	1
Submission 1: South Taranaki District Council.....	1
Submission 2: Te Korowai o Ngāruahine Trust	2
Submission 3: Neil and Lloma Hibell	3
Submission 4: Forest and Bird.....	4
Submission 5: Anne Collins	5
Submission 6: Federated Farmers	6
Submission 7: Te Atiawa	10
Submission 8: New Plymouth District Council	15
Set of submissions.....	18
Submission 1 South Taranaki District Council.....	18
Submission 2 Te Korowai o Ngāruahine Trust	19
Submission 3 Neil and Lloma Hibell	21
Submission 4 Forest and Bird.....	22
Submission 5 Anne Collins	27
Submission 6 Federated farmers	29
Submission 7 Te Kotahitanga o Te Atiawa	34
Submission 8 New Plymouth District Council	44

Summary

This report summarised points made in submissions to the proposal to amend the *Pest Management Plan for Taranaki* (2018) to include a mustelid pest programme, including the Taranaki Regional Council's (the Council) decisions in response to submissions and reliefs sought.

Changes to the proposal are tracked in red with additions being underlined and deletions showing ~~striketrough~~.

Submissions were being received by the Council between the 7th of November 2020 until the 4th of December 2020 (and 24 December for some given technical issues). The hearing of submissions was held by Council at the Ordinary meeting of 23 February 2021.

Please refer to Appendix 1 of this report for a full copy of the submissions made on the proposal.

Submission 1: South Taranaki District Council

Submitters requests		Council decisions and reasons
General comments		
1.	Support The submitter supports the Council's focus on bringing mustelids into the Pest Management Plan noting the benefits of the proposed programme on improving indigenous biodiversity outcomes across Taranaki.	Accept The Council notes the submitter's support for the proposed amendments.
2.	Support The submitter supports the approach to identify 'Predator Control Areas' where land occupiers in a locality agree to participate in the programme. The submitter suggests this is a sensible approach and has been shown to be successful with the Possum Self-Help Programme.	Accept The Council notes the submitter's support for the proposed amendments.

Submission 2: Te Korowai o Ngāruahine Trust

Submitters requests		Council's decisions and reasons
Section 4 Organisms declared as pests		
3.	Support	Accept
	<p>The submitter supports the Council's decision to include mustelids as a target pest species in the Pest Management Plan. The submitter states that this is a sensible approach, building upon the outstanding work in possum control and the protection of indigenous biodiversity.</p>	<p>The Council notes the submitter's support for the proposed amendments.</p>
Toxins		
4.	Amend	No change required
	<p>The submitter is concerned that there will be an increased use of toxic and ecotoxic substances into the environment to control mustelids, particularly in proximity to statutory acknowledgement areas.</p> <p>The submitter seeks that:</p> <ul style="list-style-type: none"> - there is no increase in the current amount of toxic and ecotoxic substances used to control animal and plant pest species; and - where toxic and ecotoxic substances must be used, that there are buffer zones of 200 metres for any waterways or Ngāruahine statutory areas. 	<p>The Council notes the submitter's concerns regarding increased use of toxins but notes that both initial and ongoing mustelid control are based upon a (non-toxic trap) network.</p>
Iwi participation		
5.	Amend	No change required
	<p>The submitter seeks that Ngāruahine iwi and hapū members participating in current and future pest control and management to support their role as kaitiaki. In particular, the submitter seeks that:</p> <ul style="list-style-type: none"> - pest control favour manual, non-chemical methods - pest control involve collaboration with mana whenua and a genuine expression of kaitiakitanga; and - any monitoring or management of aquatic or terrestrial indigenous biodiversity involves collaboration with mana whenua in recognition of the partnership principle of the Treaty of Waitangi. 	<p>The Council notes it welcomes iwi involvement in mustelid control and can advise members on the appropriate training and qualifications required to undertake this work.</p> <p>As noted above, the Council further notes that the mustelid programme utilises traps for both initial and ongoing control. Also, as part of any operation, Council will endeavour to involve and collaborate with mana whenua in accordance with the Council's statutory responsibilities and in recognition of their kaitiaki role and the partnership principles of the Treaty of Waitangi.</p>

Submission 3: Neil and Lloma Hibell

Submitters requests		Council's decisions and reasons
General comments		
6.	Oppose	Decline
	<p>The submitter is opposed to regulatory requirements for mustelid control.</p> <p>The submitter considers that the Council is expecting too much from landowners. The submitter notes that they agreed to join the mustelid scheme on a (voluntary) basis with the expectation that they would not need to manage traps on their farm. The submitter is concerned that in addition to proposed requirements to undertake additional predator control work on their farms, farmers are already doing extra work in fencing, planting waterways and possum control.</p>	<p>The Council declines the relief sought.</p> <p>The Council notes the submitter's opposition to regulatory requirements for mustelid control. Council acknowledges the additional compliance costs (in time and in money) imposed on farmers and other land occupiers. Hence, the partnership approach whereby the Council funds the initial control and provides consider support for the land occupier's efforts.</p> <p>Of note, the Council and contractors work individually with land occupiers to ensure they are fully aware of the regulatory requirements and that traps are positioned with ease of ongoing control front of mind. Council notes that so far over 90% of farmers approached have agreed to be part of this programme. For the reasons outlined in the proposal, the Council does not believe a non-regulatory approach will achieve effective sustainable mustelid control and recommend declining the relief.</p>

Submission 4: Forest and Bird

Submitters requests	Council's decisions and reasons
Section 4 and Rule 3	
7. Support	Accept
<p>The submitter supports the identification of mustelids as a pest and the application of rules to control mustelids on Taranaki. The submitter considers the proposal to be in line with the Council's vision of being predator free.</p>	<p>The Council notes the submitter's support for declaring mustelids to be pests.</p>
8. Amend	Decline
<p>The submitter seeks amendment to the proposal to include provisions to control feral and stray cat populations. In particular, the submitter seeks that cats be declared as pests and that the Council amend the Proposed Plan by:</p> <ul style="list-style-type: none"> - amending Section 4 to declare and identify unowned cats as pests in Table 1 of the Pest Management Plan; - including a new section setting out a sustained control programme for cats which includes rules for land occupiers within a Predator Control Area to control cats; - including a new section identifying high risk catchments for Māui dolphin as a priority for site led cat control; and - amend section 9.1 to incorporate a cat monitoring programmes in the Pest Management Plan. <p>The submitter suggested that cats need to be controlled in order to prevent the spread of toxoplasmosis a disease which poses a serious threat to the Hector's and Māui dolphins.</p> <p>The submitter also noted that Taranaki has an extremely high number of unowned cats across the region especially in the Mangamingi area where cats are often dumped. Cats are responsible for 33% of bird, mammal and reptile extinctions recorded on islands by the International Union for Conservation of Nature and feral cats are also implicated in the spread of bovine tuberculosis, with the potential to infect cattle.</p>	<p>The Council declines the relief.</p> <p>Council notes that the Government funding that enabled the Taranaki Predator-free programme to commence is for mustelids only. The current trapping infrastructure targets mustelids and is not suitable for the trapping of feral and stray cats</p> <p>Council fully understand the impacts that feral cats have within Taranaki. Hence the preparation and implementation of the <i>Taranaki Regional Council Biosecurity Strategy</i> (2018) whereby the Council, amongst other things, targets feral and stray cats as part of a site-led approach, e.g. Key Native Ecosystems.</p> <p>The Council further notes it also assists land occupiers and others to undertake feral cat control through the provision of traps.</p>

Submission 5: Anne Collins

Submitters requests		Council's decisions and reasons
General comments		
9.	Support	Accept
	The submitter supports the Council's proposal to include mustelids into the Pest Management Plan.	The Council notes the submitter's support for declaring mustelids to be pests.
Section 4 and Rule 3		
10.	Amend	Decline
	<p>The submitter is seeking amendment to include the control of feral cats in the Pest Management Plan.</p> <p>The submitter is concerned about the negative impact feral cats are having on native fauna and considers the inclusion of cats as apex predators is necessary if the Council is to be serious about this problem.</p> <p>The submitter notes that:</p> <ul style="list-style-type: none"> - feral cats have a major impact on native birds, bats, lizards and insects such as weta. Cats are also capable of travelling long distances including one tracked to cover almost 6 km; - cats are known carriers and transmitters of infectious diseases including Bovine TB, and <i>Toxoplasmosis gondii</i> (<i>T. gondii</i>). Kittens and unwell cats are the worst spreaders of these diseases. <i>T. gondii</i> can enter the waterways and eventually reach the sea where they can infect our marine mammals such as Māui and Hector's dolphins; and <p>The submitter notes that responsible cat ownership is the aim of every conservation organisation. The submitter further notes that New Plymouth District Council has a limit of five cats per household, Whanganui has three. South Taranaki District Council and Stratford District Council have no limits on the number of cats that may be kept. This encourages careless breeding, no micro chipping and the subsequent dumping of unwanted cats and kittens. Those that survive further contribute to the feral cat population.</p>	<p>The Council declines the relief.</p> <p>The Council notes the submitter's concern. However, it is noted that the Government funding that enabled the Taranaki Predator-free programme to commence is for mustelids only. The current trapping infrastructure targets mustelids and is not suitable for the trapping of feral and stray cats</p> <p>The Council fully understands the impacts that feral cats have within Taranaki. Hence the preparation and implementation of the <i>Taranaki Regional Council Biosecurity Strategy</i> (2018) whereby the Council, amongst other things, targets feral and stray cats as part of a site-led approach, e.g. Key Native Ecosystems.</p> <p>Council further notes that it also assists land occupiers and others to undertake feral cat control through the provision of traps and would support any district council bylaw that sought to reduce or limit the number of domestic cats allowed per household.</p>

Submission 6: Federated Farmers

Submitters requests		Council's decisions and reasons
General comments		
11.	Support The submitter noted that it was good to see a detailed cost benefit analysis in the proposal.	No change required The Council notes the submitter's comments. No further action required.
12.	Other The submitter has asked for formal guidance regarding who is responsible for maintaining and servicing the traps. Due to farms being subject to lease or contract milking or share-milking arrangements, certainty and clarity is required on who has responsibilities. The submitter would also like to see ongoing emphasis on catchment level programmes and encourage Council to continue supporting various funding mechanisms of pest control at either a catchment level and/or individual farm level, such as the Key Native Ecosystems programme. In addition, the submitter would encourage Council to support on-going discussion with community groups e.g. Wild for Taranaki, regarding the use of community volunteers to check trap lines in catchments or on individual properties.	Accept The submitter raises a number of technical and operational queries relating to the implementation of the mustelid programme. The Council notes that the term occupier comes from the <i>Biosecurity Act 1993</i> , it refers to the owner, occupier or person in charge of the property. Council will work with the submitter to produce appropriate guidance. The Council further notes that the requested emphasis on catchment level programmes and supporting individuals and community groups to undertake pest control, including the checking of traps, is consistent with the Council's approach set out in the proposal plus the <i>Taranaki Regional Council Biosecurity Strategy</i> .
Section 4 [Organisms declared as pests]		
13.	Support The submitter supports the inclusion of mustelids in section 4 as organisms declared as pests and the identification of ferrets, stoats, and weasels as pests in Table 1. The submitter notes that mustelids can have a negative impact on primary production due to their ability to carry parasites and toxoplasmosis.	Accept The Council notes the submitter's support.

Section 6.6A [Predators (ferret, stoat and weasel)]		
14.	<p>Support</p> <p>The submitter broadly agrees with the proposed objective set out in 6.6A of sustainably controlling mustelid numbers within a specified Predator Control Area, and elsewhere to avoid or minimise adverse effects on indigenous biodiversity values in the Taranaki region.</p> <p>The submitter offers on-going support to Council’s extension programme as the principal method by which Council will achieve this objective.</p> <p>The submitter acknowledges the success of the Self-help Possum Control Programme and expects it will be as effective in controlling mustelids. Given predator control areas are only established when most of the community agree to work with Council in order to control mustelids, the submitter agrees there must be a legal ‘failsafe’ to ensure these efforts are not in vain.</p>	<p>Accept</p> <p>The Council notes and appreciate the submitter’s offer of ongoing support.</p>
Section 6.6A [Measuring what the objectives are achieving]		
15.	<p>Support</p> <p>The submitter supports the establishment and mapping of Predator Control Areas (clause (ba)) and robust modelling of mustelid population densities and trends over time (clause (bb)) to determine the effectiveness of the programme.</p>	<p>Accept</p> <p>The submitters support for proposed clauses (ba) and (bb) are noted.</p>
Rule 3 [General Rule for Predator Control Areas]		
16.	<p>Amend</p> <p>The submitter seeks amendment to Rule 3 of the Pest Management Plan to read:</p> <p><i>“...A land occupier within a Predator Control Area must maintain ferrets, stoats, and weasels numbers present on their land by:</i></p> <p><i>(a) servicing permanent mustelid traps a minimum of ten <u>eight</u> times per calendar year and record trap catch information in the TrapNZ database; and</i></p> <p><i>(b) servicing any activated ‘remote sensor mustelid trap’ within 30 days of activation.</i></p>	<p>Accept</p> <p>Council acknowledges the additional work for farmers that the new rules will require. Accordingly, Council officers and contractors will work individually with land occupiers to ensure that traps are positioned to ensure ongoing control is as easy and practicable as possible for the farmers.</p> <p>The Council has investigated, as part of the development of the proposal, rules and associated compliance monitoring techniques, including the technical feasibility of adopting a rule similar to the possum trap-catch system. Unfortunately, there is no equivalent robust compliance monitoring technique for mustelids (similar in kind to the trap-catch) at a farm scale. Council will continue to reassess new monitoring</p>

Note: 'Servicing' means the removal of dead animals, inspection of trap to make sure it is functioning properly, grass/obstacles removed from around the trap entrance and trap rebaited with fresh bait.

OR

Delete proposed rule 3 and with new rule as below:

"...A land occupier within a Predator Control Area must control mustelids present on their land by regularly servicing permanent mustelid traps and recording trap catch information as practicable in accordance with Council advice."

The submitter is supportive of the logic behind the inclusion of the proposed Plan rule 3, but cautions that its effectiveness will depend on its enforceability and on-going monitoring.

The submitter notes that the general rule in support of the self-help possum control programme (6.6.3.1) requires landowners to maintain possum numbers present on their land to below a 10% residual trap catch. This allows the landowner to focus on the objective without enforcing a potentially onerous servicing requirement. As mustelid population densities and trends become clearer over time, the submitter would like to see the inclusion of a residual trap catch requirement (or similar) in the mustelid rule so the focus shifts from how often farmers service their traps to an agreed outcome.

In the absence of such a measure, the submitter is concerned that the proposed requirement for land occupiers to service traps 10 times per calendar year is unnecessarily onerous and places an additional burden on farmers that are already putting in good work through the possum control program. The submitter states that the requirement to service traps a minimum of 10 times per calendar year would be impractical due to busy periods like calving and mating. For these reasons the submitter asks that the proposed rule is amended to reduce or omit the prescriptive trap servicing requirement

systems and will revisit the rule should alternative robust farm-scale monitoring be developed.

Mustelid control is most successful when traps are permanently set due to mustelids large home ranges, however increased captures often occur from November to March, the Council notes that a minimum of ten checks should not be too onerous and will achieve the best level of control.

Notwithstanding the above, Council has reviewed the rule's trapping requirement and considers Council can reduce the requirement in accordance with the submitter's request to be less onerous on the land occupier and still achieve the biodiversity outcomes sought. Accordingly, the Council recommends amending Rule 3 of the Pest Management Plan to read:

"...A land occupier within a Predator Control Area must maintain ferrets, stoats, and weasels numbers present on their land by:

- (a) servicing permanent mustelid traps a minimum of ~~ten~~ eight times per calendar year and record trap catch information in the TrapNZ database; and*
- (b) servicing any activated 'remote sensor mustelid trap' within 30 days of activation.*

Note: 'Servicing' means the removal of dead animals, inspection of trap to make sure it is functioning properly, grass/obstacles removed from around the trap entrance and trap rebaited with fresh bait.

Good Neighbour Rule		
17.	<p>Amend</p> <p>The submitter understands the reasoning in Council’s cost benefit analysis and their obligations for considering a good neighbour rule under the Biosecurity Act 1993 and the <i>National Policy Direction on Pest Management 2015</i>. However, the submitter would like further information on its viability.</p> <p>The submitter appreciate Council’s view that the 200ha dispersal range of mustelids would necessitate a 2km buffer and have the potential to impose significant costs on landowners that are not within a predator control area. Notwithstanding this the submitter views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and not required to directly contribute to regional pest management. The submitter acknowledges that the Department of Conservation undertakes significant pest management in the region, e.g. the Mounga project. However, consideration to the good neighbour rule is often necessary as it is accepted that pest management generally is not effective unless all landowners (including Crown) consistently manage the spread of pests. Council’s own analysis of “who should pay?” in section 3.5 of the partial review document lists the Department of Conservation as a “major” beneficiary of the proposed predator control while private landowners, including dairy, sheep and beef farmers are listed only as “minor” beneficiaries.</p>	<p>Decline</p> <p>The Council notes the submitter’s concerns regarding potential externality impacts arising from Crown land.</p> <p>The Council notes that as part of the development of the proposal, Council considered the development and inclusion of a Good Neighbour rule. However, the dispersal range of mustelids meant that a 2 kilometre buffer would have been required and it was believed the compliance costs imposed would have been disproportionate to the benefits anticipated. The Council is are satisfied that given the ongoing commitment by Taranaki Mounga Project and the Department of Conservation to managing mustelids on Crown land a Good Neighbour rule is not necessary at this time. However, these assumptions will be tested in the future (see comments below) as part of a full Plan review.</p>
18.	<p>Amend</p> <p>As Predator Free Taranaki is rolled out and its uptake grows throughout the region, the submitter seeks that the Council re-consider the imposition of a good neighbour rule to ensure Crown agencies participant in the programme to the same extent as land owners.</p> <p>The submitter considers the rationale behind inclusion of a rule to ensure land occupiers play their part to be reasonable. Likewise, they expect such a rule should apply to Crown and conservation land. The submitter notes that the negotiated understanding around potential boundary pests between the 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 the Crown.</p>	<p>Accept</p> <p>Council notes that, in accordance with the <i>Biosecurity Act</i>, the Council is required to review efficiency and effectiveness of the Pest Management Plan after five years (i.e. 2023) and undertake a full statutory review after 10 years (i.e. 2028). At that time there will be an opportunity to review the merits of the Good Neighbour rule.</p>

Submission 7: Te Atiawa

Submitters requests		Council's decisions and reasons
Rule 3 [General Rule for Predator Control Areas]		
19.	Support	Accept
	<p>The submitter states that trapping mustelids can minimise the number of pests having a positive impact on the overall number of taonga species. The submitter states that this would return mauri to the whenua, wai and tangata. The submitter notes that the trapping of mustelids relates to the Te Atiawa Iwi Management Plan which states that weeds and pests generate adverse effects on the survival of native biodiversity.</p>	<p>The Council notes the submitter's comments and support for the protection of taonga species and native biodiversity.</p>
Section 4 [Organisms declared as pests]		
20.	Support	Accept
	<p>The submitter supports the addition of mustelids in the proposed Plan as it aligns with the provisions of the Te Atiawa Iwi Management Plan, specifically the Te Tai Tāne Tokorangi chapter of the Plan which outlines the protection and restoration of native biodiversity encouraging weed and pest management.</p>	<p>The Council notes the submitter's support for the proposed amendments to include mustelids in the Pest Management Plan and the programme's alignment with the Te Atiawa Iwi Management Plan.</p>

General comments	
21.	<p>Clarification</p> <p>Notwithstanding the submitter’s general support for the proposed amendments to the Pest Management Plan, the submitter is seeking clarification with regard to the Council’s consideration of the consequential effects mustelid management and control will have on rabbit populations given rabbits are the main diets of ferrets.</p> <p>Clarification is further sought by the submitter as to why the partial review is limited to mustelids only as the <i>Taranaki Regional Council Biosecurity Strategy</i> in addition to possums and mustelids, identifies rabbits, goats, feral cats and rats as pest animals which are threatening Taranaki biodiversity as well.</p>
	<p>No change required</p> <p>The Council notes that mustelid control will <u>not</u> consequentially increase rabbit populations. Research conducted by Manaaki Whenua has confirmed that the biggest driver of rabbit populations is climatic, i.e. warm dry winters often see a rise in rabbit populations. Further information on this research can be found here. However, of note Council, as part of the <i>Towards Predator Free Taranaki</i> research programme, has been analysing mustelid stomach content (to confirm assumptions) which has found bird and rodents present with no samples so far identifying rabbits. The Council is confident that the programme will not increase rabbit numbers.</p> <p>The Council also notes that proposals to include other pest animal species and impose rules and obligations on people were considered as part of the full review of the Pest Management Plan completed in 2018. This review is deliberately confined to mustelids in response to changing policy circumstances.</p> <p>Government funding that enabled the Taranaki Predator-free programme to commence is limited to mustelids only. The current trapping infrastructure targets mustelids and is not suitable for the trapping of other pests such as rabbits, goats and cats.</p> <p>The Council notes that it targets other harmful species. Through the preparation and implementation of the <i>Taranaki Regional Council Biosecurity Strategy (2018)</i> the Council has a range of non-regulatory programmes targeting other harmful species such as feral cats, deer, goats, pigs, rats, rabbits and hares. This Strategy and the Council’s non regulatory programmes continue to be considered the most effective and appropriate form of intervention for the aforementioned harmful animals.</p> <p>Although rats are not targeted in the Proposal they are controlled as a ‘by-kill’ during the initial predator control work for mustelids. The Council further notes that it also provides assistance to land occupiers and others to undertake feral cat control through the provision of traps.</p>

1.4 [Consultation overview]		
22.	<p>General comments</p> <p>The submitter notes that Section 2.4 of the Pest Management Plan states:</p> <p><i>“...the Taranaki Regional Council, seek to provide for the protection of the relationship between Māori as tangata whenua and their ancestral lands, their waters, sites, wāhi tapu, and taonga and for the protection of those aspects from the adverse effects of pests, through the Plan. Māori involvement in biosecurity is an important part of exercising kaitiakitanga over their mana whenua. The Local Government Act (LGA) requires the Taranaki Regional Council to recognise and respect the Crown’s responsibilities under the Tiriti o Waitangi – Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes considering ways to help Māori to contribute. These responsibilities and requirements were met while preparing this Plan and will continue after it takes effect”.</i></p>	<p>No change required</p> <p>The submitter’s comments are noted and is in the context of questioning the Council’s consultation and engagement processes with tangata whenua as part of this review. The Council’s response to this matter is addressed in submission point 23 below [Consultation overview].</p>
1.4 [Consultation overview]		
23.	<p>Other</p> <p>The submitter notes that section 72(1)(c) of the <i>Biosecurity Act</i> requires consultation with tangata whenua. The submitter therefore notes their concern that tangata whenua have been restricted in the participation of submitting on the partial review and this does not constitute kaitiakitanga.</p> <p>The submitter suggests that sending one email <u>is not</u> sufficient, effective and meaningful consultation as one email does not maintain and improve opportunities for ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa to contribute to this decision-making process.</p>	<p>No change required</p> <p>The submitter contends that pre-notification consultation with iwi authorities is confined to one email and does not constitute recognition of [sic] kaitiakitanga.</p> <p>The Council does not agree with the contention that pre-notification consultation with iwi authorities is confined to one email to iwi authorities and notes that no feedback was received.</p> <p>Council notes that key elements of this proposal were first discussed and confined during the development of Council’s <i>Biosecurity Strategy</i> and during the initial application for Government funding for which all eight iwi (including Te Atiawa) provided letters of support for.</p> <p>Council officers have subsequently regularly met with key Te Atiawa staff, including the previous Chief Executive, informally over the past 2- 3 years to update the Iwi and the Predator-free programme’s implementation within their Rohe. During these meetings, the need to incorporate a rule within the Pest Management Plan was</p>

		<p>discussed (and supported) to ensure the community’s investment in controlling mustelids could be protected.</p> <p>Prior and in addition to public notification of the Proposal, Council directly contacted iwi authorities (through email) with an outline of the key components of the proposal and invited comment or an opportunity for further discussion if there was interest. The email sent to iwi included a detailed PDF discussion document which invited iwi to work together with the council and for the council to hear the views of tangata whenua. At that time, no feedback was received from the submitter or indication that further discussion was sought.</p> <p>Of note the aforementioned engagement, was in addition to consultation requirements set out in the <i>Biosecurity Act</i> and the formal public consultation and submission process on the Proposal. It is also in addition to update information and decision making considerations forwarded to the Council’s Policy and Planning Committee, which includes iwi representatives tasked as a conduit for the exchange of information and the sharing of tangata whenua views at the Council’s decision making committees.</p> <p>Notwithstanding the above, the Council is committed and investigating a range of measures to better recognise kaitiakitanga across its functions. This remains a work in progress but one that the Council is committed to.</p>
24.	<p>Other</p> <p>The submitter further states that only tangata whenua have the expertise to advise on the acceptability of effects on themselves and their cultural, natural and physical resources and it is important to Te Atiawa iwi that taonga species are protected through pest management and control.</p>	<p>No change required</p> <p>The submitter’s comments are noted. The proposal should contribute to the better protection of taonga species. No action required.</p>

General comments (how impacts on Māori are monitored)	
25. Other	No change required
<p>The submitter seeks clarification as to how the results of pest management and control and the impacts on Māori culture and traditions are to be monitored, in addition to the effectiveness of the Pest Management Plan in this regard.</p> <p>The submitter notes that Section 9.4 of the Pest Management Plan states “...<i>The provisions of this Plan do not replace other legislation or regulations relating to the use of toxins, impacts on Māori culture and traditions, and public health and safety</i>”. However, only tangata whenua have the expertise to advise on impacts on Māori culture and traditions.</p>	<p>The Council notes that, in accordance with the <i>Biosecurity Act</i>, the Council is required to review efficiency and effectiveness of the Pest Management Plan after five years (i.e. 2023) and undertake a full statutory review after 10 years (i.e. 2028).</p> <p>At that time there will be an opportunity to review the effectiveness of pest management and control with the presumption that the protection of biodiversity will contribute to the protection of tangata whenua values, including taonga species. This will also include consideration of the results of baseline and trend biodiversity monitoring over the life of the Pest Management Plan, including bird counts.</p> <p>Council agrees with the submitter that only tangata whenua have the expertise to advise on the impacts of the Plan on Māori culture and traditions. The Council notes that the proposed changes to the Plan do not represent a change in the Council’s pest management <i>modus operandi</i>. The Council only expects positive impacts arising from the implementation of the Plan. However, the Council would expect it to be advised by tangata whenua if unforeseen or unintended adverse impacts were to occur from the implementation of the Plan on Māori culture and traditions.</p>

Submission 8: New Plymouth District Council

Submitters requests		Council's decisions and reasons
Section 6.6A [Proposed programme]		
26.	Support	Accept
	The submitter supports the proposal to incorporate a sustained control management programme for ferrets, stoats, and weasels into the proposed Plan. The submitter states that New Plymouth District Council have been trapping mustelids in their reserves through the 'restore New Plymouth Reserves' programme, which involves several volunteers.	The Council notes the submitter's support for the proposed amendments to include a sustained control management programme for ferrets, stoats and weasels.
Section 3.2 [Impact evaluation]		
27.	Support	Accept
	The submitter supports the Council's review of the iwi environmental management plans prepared by the Taranaki iwi and the recognition of the impact that introduced predators, such as mustelids, have on indigenous biodiversity values and taonga species.	The Council notes the submitter's support.
Section 6.6A [Proposed programme]		
28.	Amend	Accept in kind
	The submitter suggests that the 'Predator Control Areas' be mapped and included in the Pest Management Plan by way of an appendix or appendices.	<p>The Council recommends an alternative relief. This would involve mapping and appending <u>indicative</u> Predator Control Areas over the life of the Plan. More detailed GIS property maps identifying individual and aggregated properties where the mustelid rules apply will reside outside the Plan on the GIS and document management systems.</p> <p>Indicative maps are considered appropriate given that the over the life of the Plan new areas will be incrementally included into the programme subject to (yet to occur) consultation with land occupiers as part of the long term planning processes and in terms of their collective acceptance of rules in their locality to control mustelids.</p>

Section 6.6A [Towards Predator Free Taranaki]		
29.	Amend The submitter notes that the fourth paragraph of Section 6.6A refers to “targeting mustelids and rats.” The submitter questions whether the wording should include reference to rats as the remainder of the proposal does not refer to rats.	Accept in kind The Council notes that rats are an important by-kill of mustelid control. However, for the purposes of certainty and clarity recommend amending paragraph 4 of Towards Predator Free Taranaki (Section 6.6A) to read: “... the Council will undergo <i>initial predator</i> control work within the Predator Control Area targeting mustelids (<i>and rats as a by-kill</i>). “
Section 6.6A [Explanation of rule]		
30.	Amend The submitter identifies a typographical error whereby the ‘Explanation of the rule’ refers to rules 3 and 4 (when it should only refer to Rule 3). The submitter recommends amendment to the actual rules and rule references so that they align.	Accept The Council agrees (reference to Rule 4 will be deleted).
Section 9.1 [Measuring what the objectives are achieving]		
31.	Amend The submitter notes that item (c) in Section 9.1 of the Pest Management Plan refers to possum control in Egmont National Park and seeks that mustelids also be monitored.	Accept The Council agrees and will amend Section 9.1(c) of the Pest Management Plan to read: “(c) developing agreed collaborative monitoring, reporting and management programmes addressing possum <i>and mustelid</i> control within and <i>around Egmont National Park Te Papakura o Taranaki</i> .”
Section 3.2, 3.3 and 3.4		
32.	Amend The submitter has recognised minor typos in sections 3.2, 3.3 and 3.4 of the proposal and has asked that these be amended as appropriate.	No change required The submitter’s comments are noted. No details are provided of the minor typos for which correction is sought. However, the Council notes that sections 3.2, 3.3 and 3.4 of the Proposal relate to the cost benefit analysis (and not amendments to be incorporated into the operative Plan) and have served their purpose in terms of informing this Plan review.
Section 3.5 [Who should pay?]		
33.	Amend The submitter notes that the “Land occupiers with infestations are the principal exacerbators of the problem”, the submitter suggests that this working could	No change required The submitter’s comments are noted.

be amended to read: *“Land occupiers who are not managing infestations on their property are the principal exacerbators of the problem.”*

The Council notes that section 3.5 of the Proposal relates to the cost benefit analysis (and not amendments to be incorporated into the operative Plan) and have served their purpose in terms of informing this Plan review. However, the Council agrees with the views expressed and will be incorporating similar statements into future cost benefit analyses.

Set of submissions

Submissions on the proposal to amend the Regional Pest Management Plan

Submission 1 South Taranaki District Council

Submissions and the identity of submitters are public information and will be published on the Council's website and made available for others to publish.

I understand

Name

Rebecca Martin

Company or organization (if applicable)

South Taranaki District Council

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Do you wish to speak to your submission at a hearing?

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The South Taranaki District Council (STDC) thanks the TRC for the opportunity to comment on the partial review of the Pest Management Plan for Taranaki.

We support TRC's focus on bringing mustelids into the Pest Management Plan, as this will have direct impacts on improving indigenous biodiversity outcomes across Taranaki. The approach to identify 'Predator Control Areas' where land occupiers in a locality agree to participate in the programme is a sensible one, and this approach has been shown to be successful with the Possum Self-Help programme.

There is already a large ground-swell of conservation and biodiversity protection work being undertaken by our communities in Taranaki, and this change to the Pest Management Plan will help to augment and support the implementation of that work.

However, it is essential that TRC continue to support and enable landowners to carry out this work, so that best-practice pest-control techniques are carried out as standard across the region

Submission 2 Te Korowai o Ngāruahine Trust



Dion Luke
Te Korowai o Ngāruahine Trust
147 Hight Street, Te Hāwera

27th November 2020

Chief Executive
Taranaki Regional Council
Private Bag 713
Stratford 4352

Tēnā koutou e te kaunihera. This submission is made on behalf of Te Korowai o Ngāruahine Trust and supports the proposed amendment to the Pest Management Plan for Taranaki with some additional inclusions.

Te Korowai o Ngāruahine Trust is the post treaty settlement governance entity for the Iwi Ngāruahine. It is the role of the Trust to represent the interests and concerns of Iwi members on social, cultural and environmental issues. On behalf of Te Korowai o Ngāruahine Trust, we would like to support the inclusion of mustelids as a target pest species in the Pest Management Plan for Taranaki. We believe this is a sensible approach which builds upon the regional councils outstanding work on possum control throughout the region and protection of indigenous biodiversity. However, we believe the following issues should be addressed by the proposed amendment.

1. We are concerned that there will be an increased introduction of toxic and ecotoxic substances into the environment particularly in proximity to the statutory areas identified in Schedule 1 of the Ngāruahine Claims Settlement Act 2016 (<http://www.legislation.govt.nz/act/public/2016/0093/latest/whole.html>).
2. We would like to see Ngāruahine Iwi and hapū members participating in current and future pest control and management to support their role as kaitiaki within the role of Ngāruahine.

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To this end we suggest that the Council accept the proposed amendment with further provisions that:

- there is no increase in the current amount of toxic and ecotoxic substances used to control animal and plant pest species;
- where toxic and ecotoxic substances must be used, there are buffer zones of 200 metres for any waterways or Ngāruahine statutory areas;
- animal and plant pest species controls favour manual, non-chemical methods which involve collaboration with mana whenua and a genuine expression of kaitiakitanga;
- any monitoring or management of aquatic or terrestrial indigenous biodiversity involves collaboration with mana whenua in recognition of the partnership principle of the Treaty of Waitangi.

Thank you for considering our submission, and I look forward to the opportunity to speak to it.

Ngā manaakitanga o te wā



Dion Luke (MP/en, B Env & Soc, UGDipNat Res)
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Submission 3 Neil and Lloma Hibell

Submissions and the identity of submitters are public information and will be published on the Council's website and made available for others to publish.

I understand

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Do you wish to speak to your submission at a hearing?

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When we joined the scheme we said we would not be prepared to look after the traps as we do not live on the farm and we do not expect our sharemilker to have an extra job added to his contract, We agreed to the scheme because we were told that the Council was employing contractors to monitor the traps. The farmers have had so much extra work ie fencing waterways and planting them and possum control we think the Council is expecting too much of landowners to add more work to their already busy schedule.



Forest & Bird

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

4 December 2020

Submission on partial review of the Pest Management Plan for Taranaki

To: Chief Executive
Taranaki Regional Council
Private Bag 713
Stratford 4352

Submitted online.

From: North & South Taranaki Branch
Royal Forest and Bird Protection Society (Forest & Bird)
P.O. Box 631
Wellington 6011

Attn: Amelia Geary – Regional Conservation Manager
a.geary@forestandbird.org.nz or 022 039 9363

Introduction

1. Forest & Bird is New Zealand's largest independent conservation organisation. Our mission is to protect New Zealand's unique flora and fauna and its habitat.
2. We congratulate Taranaki Regional Council (TRC) on this partial review of the Regional Pest Management Plan (RPMP) and attempts to bring TRC in line with its vision for predator-free Taranaki. Forest & Bird supports the identification of mustelids as a pest and the application of rules to control mustelids in Taranaki. We, however, suggest this plan review is too narrow in scope and, in accordance with 100D(2)(b) of the Biosecurity Act, cats have been overlooked. Our submission relates to the proposed inclusion of mustelids and our requested inclusion of cats in Taranaki's RPMP.
3. We would like to speak in support of our submission.

SUBMISSION

Forest & Bird supports inclusion of a sustained control programme for mustelids.

4. Although habitat loss and modification remains a threat to native biodiversity, a more equally serious threat is from invasive introduced species. Mustelids pose a significant threat to our remaining natural ecosystems, habitats and threatened native species. They can also have considerable negative impact on primary production. Mustelids are implicated in the extinction of some indigenous bird species and as the major cause of decline of many others¹. Ferrets are also a threat to agriculture, particularly through their role as a vector of bovine tuberculosis².
5. Forest & Bird supports TRC's proposal that mustelids be added to the RPMP in order to:
 - minimise the actual or potential adverse or unintended effects associated with mustelids; and
 - maximise the effectiveness of individual pest management actions for mustelids by way of a regionally coordinated approach.

It is appropriate that the RPMP be amended to declare mustelids to be 'pests' and empower TRC to exercise the relevant advisory, service delivery, regulatory and funding powers available under the Act to deliver mustelid control in defined parts of Taranaki.

6. **Relief sought:** Allow changes to the RPMP to enable a sustained control programme for mustelids. Specifically, the amendment to Section 4 that declares and identifies ferrets, stoats, and weasels as a pest in Table 1 of the RPMP; the new section 6.6A setting out a sustained control programme for mustelids which includes rules for land occupiers within a Predator Control Area to control mustelids; the amended section 9.1 to incorporate mustelid monitoring programmes in the RPMP; and an amended glossary to introduce a definition for a new term in the RPMP – 'Predator Control Area'.

Forest & Bird seeks the inclusion of a sustained control programme for unowned cats.

7. In light of the Biosecurity Act's direction in s100D regarding reasons for reviews, Forest & Bird suggests the scope of this partial review is too narrow. Section 100D(2) states:

The Minister or council may review the whole or part of a plan if the Minister or council has reason to believe—

 - (a) that the plan or part is failing to achieve its objectives; or
 - (b) that relevant circumstances have changed since the plan or part commenced.
8. Inclusion of mustelids pertains to the recent adoption of the Towards Predator-Free Taranaki programme, a commendable operation which Forest & Bird endorses wholeheartedly. However, as per s100D(2)(b) of the Act, relevant circumstances have changed since the plan commenced regarding the need to control cats in an effort to prevent the spread of toxoplasmosis. The recent review of the Hector's and Māui Dolphin Threat Management Plan identified toxoplasmosis as a serious threat to the dolphins and that there is a need to address this threat.

¹ King, CM (Ed) 2005. The Handbook of New Zealand Mammals. Oxford University Press.

² Byrom, AE, Caley, P, Paterson, BM & Nugent, G, 2015. Feral ferrets (*Mustela furo*) as hosts and sentinels of tuberculosis in New Zealand, New Zealand Veterinary Journal, 63:
<https://doi.org/10.1080/00480169.2014.98131>

9. Cats are the only known definitive host for *Toxoplasma gondii*, the parasite that causes toxoplasmosis.³ Toxoplasmosis is spread through cat faeces. A recent review of toxoplasmosis and its implications for wildlife, published this week in the journal *Pacific Conservation Biology*, surmised that the large population of owned and unowned cats, coupled with high rates of *T. gondii* seroprevalence, indicates that there is likely to be substantial loading of *T. gondii* oocysts in the New Zealand environment.⁴ Oocysts can remain infective in soil and fresh water for at least one year, and in seawater for up to two years. Contamination of fresh water by cat faeces is the source of entry for *T. gondii* oocysts into the marine environment as rain water and runoff transport the oocysts to the sea through streams, rivers and stormwater drains.⁵
10. Hector's and Māui dolphins' range includes Taranaki coastal waters, which are entirely within the West Coast North Island Marine Mammal Sanctuary.⁶ The sanctuary's offshore boundary extends from mean high water springs to the 12 nm territorial sea limit. Recent research has shown that New Zealand river currents, even from small catchments, run up to 100 kilometres out to sea.⁷ *Every single catchment in Taranaki drains into the West Coast North Island Marine Mammal Sanctuary.* Toxoplasmosis has been recorded as the primary cause of death in Hector's and Māui dolphins.⁸ Taranaki Regional Council has direct responsibility for preventing the spread of toxoplasmosis from the land to the sea, to help prevent the extirpation of these species within its rohe.
11. Domestic cats in New Zealand fall into three categories: 'owned' (pet) and 'unowned' (feral and stray). Forest & Bird considers unowned cats to be any cat which is not microchipped and registered on the New Zealand Companion Animal Register <https://www.animalregister.co.nz/> and is free-living, unsocialised and has limited or no relationship with or dependence on humans. Taranaki has extremely high numbers of unowned cats across the region. They have been described as reaching 'plague proportions' by locals in East Taranaki.⁹
12. Forest & Bird South Taranaki traps cats at Mangamingi as part of its conservation programme to protect kiwi. Our job is to keep the kiwi safe. Cats are by far the biggest threat, far greater than ferrets and stoats. Without the support of surrounding farmers trapping, we would be in a hopeless situation and unable to protect our kiwi population. A local farmer trapped a feral cat recently that weighed 10 kilos. Last year we caught a feral female with 6 kittens. A local lady started intensive cat trapping in 2003 – in that year she caught 170 cats. This year she has caught

³ Roberts, JO, Jones, HFE, Roe, WD (2020) The effects of *Toxoplasma gondii* on New Zealand wildlife: implications for conservation and management. *Pacific Conservation Biology*. Published online 1 December 2020. <https://doi.org/10.1071/PC20051>

⁴ Roberts, JO, Jones, HFE, Roe, WD (2020) The effects of *Toxoplasma gondii* on New Zealand wildlife: implications for conservation and management. *Pacific Conservation Biology*. Published online 1 December 2020. <https://doi.org/10.1071/PC20051>

⁵ Roberts, JO, Jones, HFE, Roe, WD (2020) The effects of *Toxoplasma gondii* on New Zealand wildlife: implications for conservation and management. *Pacific Conservation Biology*. Published online 1 December 2020. <https://doi.org/10.1071/PC20051>

⁶ <https://www.doc.govt.nz/globalassets/documents/conservation/marine-and-coastal/marine-protected-areas/mms-westcoast-northisland-map.pdf>

⁷ Jhugroo K, O'Callaghan J, Stevens CL, Macdonald HS, Elliott F and Hadfield MG (2020) Spatial structure of low salinity submesoscale features and their interactions with a coastal current. *Front. Mar. Sci.* 7:557360. <https://www.frontiersin.org/articles/10.3389/fmars.2020.557360/full>

⁸ Roberts, JO, Webber, DN, Roe, WD, Edwards, CTT, Doonan, IJ (2019). Spatial risk assessment of threats to Hector's and Māui dolphins (*Cephalorhynchus hectori*). New Zealand Aquatic Environment and Biodiversity Report No. 214. <https://www.fisheries.govt.nz/dmsdocument/35007/direct>

⁹ <https://www.rnz.co.nz/news/national/311897/feral-cats-reaching-%27plague-proportions%27>

66, and has consistently been between these numbers every year. Rotokare and Forest & Bird have caught 112 so far this year. In past years, we have seldom caught fewer than 50 in a year. Cats are a huge problem in the Mangamingi area. The Mangamingi Saddle, Oru Road, Lake Rotorangi boat ramp and Wingrove Road are popular dump sites for unwanted cats. They just keep coming.

13. The impact of cats on biodiversity is well documented and is greatest on endemic fauna that have evolved in regions free of mammals, such as islands, and in Australia and New Zealand.^{10,11} Cats are responsible for 33% of bird, mammal, and reptile extinctions recorded on islands by the International Union for Conservation of Nature.¹² One feral cat killed 102 endangered native short tail bats in a week on the southern slopes of Mt Ruapehu.¹³ One domestic cat in Wellington has decimated a breeding colony of banded dotterels for two seasons in a row.¹⁴ It doesn't take much to extrapolate the damage being wrought across Taranaki in the absence of systematic cat control.
14. In addition to effects on threatened species and biodiversity, cats have serious impacts on the agricultural sector. Feral cats are implicated in the spread of bovine tuberculosis, with the potential to infect cattle.¹⁵ The parasites and toxoplasmosis that cats carry cause abortions in sheep and illness in humans. Recent research in Australia demonstrated that diseases transmitted by cats cost the Australian economy more than A\$6 billion annually through their impact on human health and livestock production.¹⁶ While such research is yet to be conducted here, the farming community in New Zealand already incurs significant cost vaccinating ewes against toxoplasmosis in order to prevent lamb loss.¹⁷ With a total New Zealand cat population estimated at between 1.3 and 1.9 million individuals¹⁸ it is clear that if left uncontrolled, cats will be having a similar impact on New Zealand's economy.

¹⁰ Medina FM, Bonnaud E, Vidal E, Tershy BR, Zavaleta ES, Donlan CJ, Keitt BS, Le Corre M, Horwath SV, Nogales M, 2011. A global review of the impacts of invasive cats on island endangered vertebrates. *Global Change Biology* 17: 3503–3510, <https://doi.org/10.1111/j.1365-2486.2011.02464.x>

¹¹ Doherty TS, Dickman CR, Johnson CN, Legge SM, Richie EG, Woinarski JCZ, 2017. Impacts and management of feral cats *Felis catus* in Australia. *Mammal Review* 47: 83–97, <https://doi.org/10.1111/mam.12080>

¹² Pyšek P, Blackburn TM, García-Berthou E, Perglová I, Rabitsch W, 2017. Displacement and local extinction of native and endemic species, Pages 157–175 in Vilá M, Hulme PE eds. *Impacts of Biological Invasions on Ecosystem Services*. Springer.

¹³ <https://www.doc.govt.nz/news/media-releases/2010/cat-nabbed-raiding-the-mothership/>

¹⁴ <https://www.stuff.co.nz/environment/118927562/prowling-cat-decimates-banded-dotterel-colony-for-second-breeding-season>

¹⁵ Coleman JD, Cooke MM, 2001. *Mycobacterium bovis* infection in wildlife in New Zealand. *Tuberculosis*. 81: 3, pp 191-202. <https://doi.org/10.1054/tube.2001.0291>

¹⁶ Legge S, Taggart PL, Dickman CR, Read JL, Woinarski JCZ. (2020). Cat-dependent diseases cost Australia AU\$6 billion per year through impacts on human health and livestock production. *Wildlife Research* 47, 731-746. <https://doi.org/10.1071/WR20089>

¹⁷ Tompkins, D.M. 2014. Potential of Feral Cat Control to Reduce the Incidence of Toxoplasmosis on Sheep Farms. Report Addendum. Landcare Research. Report prepared for Hawkes Bay Regional Council.

¹⁸ Roberts, JO, Jones, HFE, Roe, WD (2020) The effects of *Toxoplasma gondii* on New Zealand wildlife: implications for conservation and management. *Pacific Conservation Biology*. Published online 1 December 2020. <https://doi.org/10.1071/PC20051>

15. **Relief sought:** further amend the RPMP to include a sustained control programme for unowned cats *across the entire Taranaki region*, with site-led control focussing on catchments that present particular risk to Māui dolphin. Specifically:

- amend Section 4 to declares and identify unowned cats as a pest in Table 1 of the RPMP;
- include a new section setting out a sustained control programme for cats which includes rules for land occupiers within a Predator Control Area to control cats;
- include a new section identifying high risk catchments for Māui dolphin as a priority for site-led cat control; and
- amend section 9.1 to incorporate a cat monitoring programmes in the RPMP;

Submission ends.

Submission 5 Anne Collins

Submissions and the identity of submitters are public information and will be published on the Council's website and made available for others to publish.

I understand

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Do you wish to speak to your submission at a hearing?

No

Enter your feedback in the textbox below or upload a file at the bottom of the page.

Submission on partial review of the Pest Management Plan for Taranaki Anne Collins

1. I support the Taranaki Regional Council (TRC), in it's proposal to include mustelids into its pest management rule book, the Regional Pest Management Plan for Taranaki.
I urge the Council to include the control of feral cats in this plan. This makes sense because if we are to be serious about protecting our native fauna by removing predators, then the inclusion of cats as apex predators is required.
2. All cats are natural hunters including domestic cats. Domestic cats are important as much loved companion animals, and are hugely popular. My submission does not seek to remove these. Feral cats have a major impact on native birds, insects, bats, lizards and insects such as weta. Cats are capable of travelling long distances including one tracked to cover almost 6 Km, as has been documented.
<https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/feral-cats/>
<https://www.nzherald.co.nz/lifestyle/cat-tracking-study-an-eye-opener-for-owners/2Y53ECMIPCUQMPNU5V2ZZ4XEAM/>
3. Cats are known carriers and transmitters of infectious diseases. These include Bovine TB, and importantly for our native animals, Toxoplasmosis gondii (T. gondii). Kittens and unwell cats are the worst spreaders of this disease by T. gondii oocysts (eggs) in their faeces. Other animals become infected by ingesting these. The eggs enter the waterways and eventually reach the sea where they can infect our marine mammals. In particular, Maui and Hector's dolphins are at risk.
4. Responsible cat ownership is the aim of every conservation organisation, but this is definitely a wish list. Currently, New Plymouth District Council has a limit of five cats per household, Whanganui has three. South Taranaki District Council and Stratford District Council have no

limits on the number of cats that may be kept. This encourages careless breeding, no micro chipping and the subsequent dumping of unwanted cats and kittens. Those that survive further contribute to the feral cat population.

“While possums are the priority for Predator Free Hawke's Bay's efforts on the Mahia Peninsula, feral cats will also be in their sights along with stoats and rats.”

“Really it's about responsible cat ownership - making sure they are de-sexed if they are not going to be bred from, and micro-chipping.

In February this year a new bylaw was introduced in Wellington requiring all domestic cats over the age of 12 weeks to be microchipped and registered with the NZ Companion Animal Register.”

<https://www.nzherald.co.nz/hawkes-bay-today/news/feral-and-stray-cat-control-a-complex-issue/IF2FKFJZZGHWA5OAUXCXRGPBIE/>

Submission 6 Federated farmers

To: **Taranaki Regional Council**

Submission on: **Partial Review of the Regional Pest Management Plan for Taranaki**

Date: 4 December 2020

Submission by: Federated Farmers Taranaki

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1. General comments

We appreciate the opportunity to submit on Taranaki Regional Council's Partial Review of the Pest Management Plan. This submission is representative of member views and their first-hand experience with pest management. The publication of the proposed changes recognises that much of the good work done around pest management happens outside of a regulatory environment and that this is often the most appropriate form of management. Federated Farmers ('FFNZ') has long been an advocate for robust cost benefit analysis as the foundation for good decision making, both at local and central government levels. It is therefore good to see a detailed cost benefit analysis of the proposed changes.

As the proposed control of mustelids will largely happen on farming properties, we encourage Council to consider some of the practical issues for farmers.

Farms are often subject to lease or contract milking or share-milking arrangements that complicate the question of who is responsible or available for maintaining and servicing traps. We would like Council to provide formal guidance on this to ensure there is no 'grey area' for farmers who may wish to control predators but are unsure of their responsibilities.

Dairy farming is a seasonally intensive activity requiring a heavy workload in the calving and mating periods (usually June through to the end of November). During this period trap servicing is unlikely to be carried out on many properties and the servicing requirements of any proposed rule should reflect this.

While acknowledging the need for a rule to formalise predator control efforts on a landholder basis, FFNZ would like to see an on-going emphasis on catchment level programs. We encourage Council to continue supporting various funding mechanisms of pest control at either a catchment level and/or individual farm level, such as the KNE programme. In addition, we

would encourage Council to support on-going discussion with community groups e.g. Wild for Taranaki, regarding the use of community volunteers to check trap lines in catchments or on individual properties. We envisage that some large farming properties will have significant numbers of traps and owner or farm staff capacity to keep these regularly checked will be challenging.

FFNZ would like to engage further with Council on this as part of this review.

2. Summary

- FFNZ encourages Council to be mindful of practical farming issues
- FFNZ supports the inclusion of mustelids in section 4 as organisms declared as pests
- FFNZ agrees with the objective set out in section 6A
- Retain the proposed performance measures for pest management in the Taranaki Region
- Amend or delete and replace proposed rule 3
- FFNZ supports Council's approach to the good neighbour rule in the initiation phase of towards Predator Free Taranaki ('the program') but would like to see the good neighbour rule implemented as the programme becomes more popular

3. Specific Comments

3.1 Inclusion of Mustelids as Pests

We support the inclusion of mustelids in section 4 as organisms declared as pests and the identification of ferrets, stoats, and weasels as pests in Table 1. Mustelids can have a negative impact on primary production as they carry parasites and toxoplasmosis, which can cause illness in humans and livestock. Ferrets are also a vector (carrier) of bovine tuberculosis.

3.2 Objective

Federated Farmers agrees broadly with the objective set out in 6A. That is - we agree with the objective of sustainably controlling mustelid numbers within a specified Predator Control Area, and elsewhere to avoid or minimise adverse effects on indigenous biodiversity values in the Taranaki region. FFNZ also offer our on-going support to Council's extension program as the principle method by which Council will achieve this objective. Council's self-help Possum control program was established in 1992 and was extended to include mustelids in 2018. The programme requires Council take a lead on predator control where 75% of land occupiers, covering at least 75% of the land area targeted indicate or have indicated, that they wish to be included in the program. FFNZ acknowledge the success of this program in controlling possums and expect it will be as effective in controlling mustelids. The inclusion of a rule in the RPMP to deal with mustelids is intended to encourage the participation of the few landowners that refuse to undertake predator control ('exacerbators' as defined by Council). Given predator control areas are only established when most of the community agree to work with Council in order to control mustelids, we agree there must be a legal failsafe to ensure these efforts are not in vain. FFNZ are supportive of the logic behind the inclusion of the proposed Plan rule 3, but caution that its effectiveness will depend on its enforceability and on-going monitoring.

3.3 Measuring what the Objective is Achieving

Proposed measures:

(ba) annually mapping the implementation of the Towards Predator Free Taranaki programme, including establishment of Predator Control Areas;

(bb) monitoring mustelid population densities and trends, over time, in areas included in the Predator Control Areas;

FFNZ support the establishment and mapping of Predator Control Areas and robust modelling of mustelid population densities and trends over time to determine the effectiveness of the program.

3.4 Proposed Plan Rule 3: General Rule for Predator Control Areas

A land occupier within a Predator Control Area must maintain ferrets, stoats, and weasels numbers present on their land by:

(a) servicing permanent mustelid traps a minimum of ten times per calendar year and record trap catch information in the TrapNZ database; and

(b) servicing any activated 'remote sensor mustelid trap' within 30 days of activation.

Note:

'Servicing' means the removal of dead animals, inspection of trap to make sure it is functioning properly, grass/obstacles removed from around the trap entrance and trap rebaited with fresh bait.

'Remote sensor mustelid traps' refers to kill traps fitted with remote sensor technology capable of sending trap catch information to the user wirelessly.

3.5 Reason for submission on Proposed Rule 3

The effectiveness of the rule will be based on Council's ability a) to enforce it, and b) to monitor its impact. In the view of FFNZ an effective predator control rule will focus on outcomes rather than process. We note that the general rule in support of the self-help possum control program (6.6.3.1) requires landowners to maintain possum numbers present on their land to below a 10% residual trap catch. This allows the landowner to focus on the objective without enforcing a potentially onerous servicing requirement. We also understand that mustelid populations are difficult to track and establishing a residual catch number may be impractical in the short term. As mustelid population densities and trends become clearer over time, we would like to see the inclusion of a residual trap catch requirement (or similar) in the mustelid rule so the focus shifts from how often farmers service their traps to an agreed outcome. From a practical standpoint landowner are more likely to integrate mustelid trap servicing with routine possum trap/bait station servicing, with this in mind FFNZ would (in time) like the mustelid control rule more closely aligned to the possum control rule.

Our concern with the rule as drafted is that the requirement to service traps 10 times per calendar year may needlessly place an additional burden on farmers that are already putting in good work through the possum control program and thus create some pushback from farmers. Additionally, the seasonal intensity of dairy farming is likely to make the requirement to service traps a minimum of 10 times per calendar year impractical due to busy periods like calving and mating. FFNZ asks that the proposed rule is amended to reduce or omit the prescriptive trap servicing requirement. Farmers will be more likely to embrace and sustain their participation in the program if they have ownership over servicing requirements and can make the logistics of pest control work for their own property and their farming business. For ease of reading our suggested amendments are shown with ~~strikeout~~ for deletions and underlining for additional wording.

3.6 Relief Sought

Amend Rule 3 as below:

A land occupier within a Predator Control Area must maintain ferrets, stoats, and weasels numbers present on their land by:

(a) servicing permanent mustelid traps a minimum of ~~ten~~ eight times per calendar year and record trap catch information in the TrapNZ database; and

(b) servicing any activated 'remote sensor mustelid trap' within 30 days of activation.

Note:

'Servicing' means the removal of dead animals, inspection of trap to make sure it is functioning properly, grass/obstacles removed from around the trap entrance and trap rebaited with fresh bait.

Or

Delete proposed rule 3 and with new rule as below:

A land occupier within a Predator Control Area must control mustelids present on their land by regularly servicing permanent mustelid traps and recording trap catch information as practicable in accordance with Council advice."

3.7 Good Neighbour Rule

Federated Farmers understands the reasoning in council's cost benefit analysis and their obligations for considering a good neighbour rule under the Biosecurity Act 1993 and the National Policy Direction on Pest Management 2015. That is not to say we favour exclusion of the good neighbour rule from Mustelid control but would like further information on its viability. We appreciate Council's view that the 200ha dispersal range of Mustelids would necessitate a 2km buffer and have the potential to impose significant costs on landowners that are not within a predator control area.

Notwithstanding this FFNZ views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and not required to directly contribute to regional pest management. While we acknowledge that DoC does undertake significant pest management in the region, e.g. the Mounga project, we consider the good neighbour rule is often necessary as it is accepted that pest management generally is not effective unless all landowners (including Crown) consistently manage the spread of pests. Council's own analysis of "who should pay?" in section 3.5 of the partial review document lists the Department of Conservation as a "major" beneficiary of the proposed predator control while private landowners, including dairy, sheep and beef farmers are listed only as "minor" beneficiaries. FFNZ considers the rationale behind inclusion of a rule to ensure landowners play their part to be reasonable. Likewise, we expect such a rule should apply to Crown and Conservation land. 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 the crown agencies it needs to co-operate with.

Given the general predator control rule is only applied to Predator Control Areas and as Predator Free Taranaki is still being initiated Federated Farmers understands why Council is not seeking to impose a good neighbour rule at present. As Predator Free Taranaki is rolled out and it's uptake grows throughout the region Federated Farmers would like Council to re-consider the imposition of a good neighbour rule to ensure Crown agencies participant in the programme to the same extent as land owners.

4. Federated Farmers thanks the Taranaki Regional Council for considering our feedback.

About Federated Farmers

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

-end-



23 December 2020

Taranaki Regional Council
Private Bag 713
Stratford 4352

By email: chris.spurdle@trc.govt.nz
info@trc.govt.nz

Attention: Steve Ruru

Tēnā koe Steve

SUBMISSION BY NGĀ HAPŪ O TE ATIAWA AND TE KOTAHITANGA O TE ATIAWA TRUST TO THE REGIONAL PEST MANAGEMENT PLAN FOR TARANAKI PARTIAL REVIEW

1. On behalf of ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa Trust (Te Kotahitanga), we appreciate the opportunity to provide a submission to the Taranaki Regional Council's partial review of the Regional Pest Management Plan for Taranaki (RPMP).
2. Te Atiawa Iwi are tangata whenua over the lands, waters, sites, taonga species, wāhi tapu/wāhi taonga, urupā, sites and areas of significance to Māori and other taonga within our Te Atiawa rohe. The Te Atiawa rohe extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Tahuna-a-Tūtawa, east to Whakangerengere, northeast to Taramoukou, north back to Te Rau o Te Huia and offshore out to 200 nautical miles. The Te Atiawa Iwi rohe falls wholly within the jurisdiction of the Taranaki Regional Council.
3. Te Atiawa has strong historical, cultural, traditional and spiritual connections within this rohe, our environment is a part of who we are. In return, we as kaitiaki, have the inherent responsibility of ensuring the mauri of these environmental and cultural resources is protected and enhanced for future generations.
4. Today our Te Atiawa hapū from north to south of the rohe are:
 - Ngāti Rahiri
 - Otaraua
 - Manukorihi
 - Pukerangiora
 - Puketapu
 - Ngāti Tawhirikura
 - Ngāti Tuparikino

- Ngāti Te Whiti.
5. Te Kotahitanga is the mandated voice and representative entity for the collective interests of Te Atiawa Iwi. Te Kotahitanga was established on 31 March 2014 as the post-settlement governance entity by a Deed of Trust. Following this the Te Atiawa Deed of Settlement was signed on 9 August 2014 and the Te Atiawa Claims Settlement Act (2016) enacted on 5 December 2016. Te Kotahitanga has a responsibility to ensure that the interests of Te Atiawa are safe-guarded. This includes considering the extent to which proposed policy may impact on the historical, traditional, cultural and spiritual interests of Te Atiawa within its rohe and under the Te Atiawa Claims Settlement Act 2016.
 6. Te Atiawa has rights and interests including, but not limited to:
 - Rights and interests arising under the Te Atiawa Claims Settlement Act (2016);
 - Rights and interests arising under the Te Atiawa Iwi Environmental Management Plan – *Tai Whenua, Tai Tangata, Tai Ao*; and
 - Rights and interests
 - according to tikanga and customary law;
 - arising from the common law (including the common law relating to aboriginal title and customary law); and
 - under Te Tiriti o Waitangi and its principles.
 7. Te Atiawa seek to ensure that these rights and interests are recognised in proposed policy and there is alignment with the outcomes of Te Atiawa's key iwi documents:
 - a. Te Atiawa Iwi Claims Settlement Act 2016;
 - b. Te Atiawa Deed of Settlement; and
 - c. *Tai Whenua, Tai Tangata, Tai Ao*.
 8. *Tai Whenua, Tai Tangata, Tai Ao* sets the position of Te Atiawa Iwi on resource management matters. It is an expression of rangatiratanga and kaitiakitanga from ngā uri o Te Atiawa over the environmental and cultural resources within our Te Atiawa rohe.
 9. The Taranaki Regional Council (TRC) has undertaken a partial review of the Regional Pest Management Plan for Taranaki (RPMP) by way of amending it to identify and declare mustelids as a pest species and incorporate an additional programme relating to the sustained control of mustelids. The proposed amendments to the RPMP include the introduction of a sustained control programme for mustelids and the introduction of a definition for a new term, 'Predator Control Area'.
 10. Mustelids and other pests predate on native biodiversity, especially taonga species. The loss of native biodiversity and taonga species is identified under Issue TTTT2 of the Te Atiawa iwi environmental management plan *Tai Whenua, Tai Tangata, Tai Ao* because of the effects these introduced species can have on Te Atiawa values and the health of our whenua, wai and tangata.

11. Trapping mustelids as mentioned in the Proposal¹ can minimise the number of pests, having a positive effect on the overall numbers of taonga species ultimately returning mauri to the whenua, wai and tangata. Issue TTTT4 of *Tai Whenua, Tai Tangata, Tai Ao* states '*The introduction of weeds and pests can generate adverse effects on the survival of our native biodiversity*'.
12. As previously mentioned, the addition of mustelids as a pest to the RPMP aligns with the provisions of *Tai Whenua, Tai Tangata, Tai Ao*, specifically in the Te Tai Tāne Tokorangi (TTTT) chapter of the Plan (Attachment 1). This section outlines the protection and restoration of native biodiversity encouraging weed and pest management.
13. Notwithstanding our general support for the proposed amendments to the RPMP, we trust the Taranaki Regional Council have considered the consequential effects mustelid management and control will have on rabbit populations given rabbits are the main diets of ferrets². Clarification is sought in this regard.
14. Further to the above, clarification is sought as to why the partial review is limited to mustelids only. The Taranaki Regional Council Biosecurity Strategy 2018-2038 in addition to possums and mustelids, identifies rabbits, goats, feral cats and rats as pest animals threatening Taranaki biodiversity as well.
15. Section 2.4 of the RPMP for Taranaki states '*...the Taranaki Regional Council, seek to provide for the protection of the relationship between Māori as tangata whenua and their ancestral lands, their waters, sites, wāhi tapu, and taonga and for the protection of those aspects from the adverse effects of pests, through the Plan*'. It is noted that section 72 of the Biosecurity Act 1993 requires consultation with tangata whenua (section 72(1)(c)). Pre-notification consultation with iwi authorities involved one email being sent from the Taranaki Regional Council to those iwi authorities³, noting no feedback was received (page 2 of the Proposal⁴).
16. Further to the above section 2.4 of the RPMP for Taranaki goes on to state '*Māori involvement in biosecurity is an important part of exercising kaitiakitanga over their mana whenua.. The Local Government Act (LGA) requires the Taranaki Regional Council to recognise and respect the Crown's responsibilities under the Tiriti o Waitangi – Treaty of Waitangi. It also requires councils to maintain and improve opportunities for Māori to contribute to decision-making processes. This includes considering ways to help Māori to contribute. These*

¹ Taranaki Regional Council (2020). *Proposal for inclusion of Mustelids, Regional Pest Management Plan for Taranaki*.

² Department of Conservation (2020). *Ferrets*, accessed 10 December 2020, <<https://www.doc.govt.nz/nature/pests-and-threats/animal-pests/ferrets/>>

³ See Attachment 2

⁴ Taranaki Regional Council (2020). *Proposal for inclusion of Mustelids, Regional Pest Management Plan for Taranaki*.

responsibilities and requirements were met while preparing this Plan and will continue after it takes effect.

17. Only tangata whenua have the expertise to advise on the acceptability of effects on themselves and their cultural, natural and physical resources. Pest management and control is important to protecting our taonga species; however, restricting the participation of tangata whenua to submitting on the partial review of the RPMP for Taranaki does not constitute kaitiakitanga. It is concerning that the Taranaki Regional Council continue to maintain that sending one email is sufficient, effective and meaningful consultation. One email does not maintain and improve opportunities for ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa to contribute to this decision-making process.
18. Section 9.4 of the RPMP for Taranaki states '*The provisions of this Plan do not replace other legislation or regulations relating to the use of toxins, impacts on Māori culture and traditions, and public health and safety*'. Clarification is sought as to how the results of pest management and control and the impacts on Māori culture and traditions are monitored, in addition to the effectiveness of the RPMP in this regard; noting only tangata whenua have the expertise to advise on these impacts.
19. Though ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa are generally supportive of the proposed amendments, we seek clarification to the points above.
20. Ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa wish to be heard in support of this submission.
21. If you have any questions, please contact the undersigned at the following:
Postal address: PO Box 1097, Taranaki Mail Centre, New Plymouth 4340
Email address: sarah@teatiawa.iwi.nz
Phone number: (06) 758 4685

Nāku me ngā mihi
Ngā hapū o Te Atiawa and Te Kotahitanga o Te Atiawa Trust



Liana Poutu
Te Kotahitanga o Te Atiawa Pouwhakarae/ Chairperson

Attachment 1: 6.6 Te Tai Tāne Tokorangi chapter, *Tai Whenua, Tai Tangata, Tai Ao*

6.6 TE TAI O TĀNE TOKORANGI - FLORA AND FAUNA

Tokorangi is the act of propping up the sky. Tāne Mahuta, the son of Ranginui and Papatūānuku, broke the embrace of his parents by lifting the sky and giving rise to many children each becoming the ātua of respective domains of the environment. Tāne became the ātua of the forests and birds.

Prior to European settlement, Taranaki was covered in dense native forest, shrubland and small wetland areas which held an abundance of native fauna. However, due to Taranaki's low-lying terrain much of the land was cleared for settlement. Today, remnants of native forest remain scattered around the region, with the largest concentration confined to Taranaki Maunga. The protection and enhancement of native biodiversity and mahinga kai underpins many matters which we as kaitiaki seek to address.

This section addresses matters in our Te Atiawa rohe relating to Tokorangi and covers issues such mahinga kai, native biodiversity, restoration of native species, and weed and pest management. This section should be read in conjunction with Section 6.1.

WHAKARĀPOTO NGĀ TAKE - SUMMARY OF ISSUES

The Te Tai o Tāne Tokorangi issues within the rohe of Te Atiawa are summarised below:

TE TAI O TĀNE TOKORANGI	
Ngā Take - Issues	
Issue Te Tai o Tāne Tokorangi (TTTT)1: Mahinga kai	The loss of mahinga kai areas and species as a result of habitat loss, discharges, abstractions, diversion of waterways, barriers to fish passage and introduction of exotic species is impacting on Te Atiawa values, and our health and wellbeing.
Issue TTTT2: Native biodiversity	The loss of native biodiversity and taonga species is affecting Te Atiawa values and the health of our land, water and people.
Issue TTTT3: Restoration of native biodiversity	Due to the loss of native biodiversity there is a need for species restoration initiatives.
Issue TTTT4: Weed and pest management	The introduction of weeds and pest can generate adverse effects on the survival of our native biodiversity.
Issue TTTT5: Pest management with toxins	There are concerns about the use of toxins as a method of pest control, and the impacts it can generate on our ancestral lands, waters and species.

NGĀ PAETAĒ - GENERAL OBJECTIVES

Gen. Ob. Te Tai o Tāne Tokorangi (TTTT)1.1

Protect and enhance indigenous biodiversity and taonga species within our Te Atiawa rohe.

Gen. Ob. TTTT1.2

Acknowledge and provide opportunities for practical exercise of kaitiakitanga by Te Atiawa.

for the relationship of Te Atiawa with indigenous biodiversity and taonga species with particular regard to customary use in management and decision making.

Gen. Pol. TTTT1.2

Require that central government agencies and regional and district councils recognise that only Te Atiawa can identify the impact of activities on our relationship with indigenous biodiversity and taonga species within our Te Atiawa rohe.

NGĀ KAUPAPA - GENERAL POLICIES

Gen. Pol. Tāne Mahuta (TTTT)1.1

Require that central government agencies and regional and district councils recognise and provide

Gen. Pol. TTTT1.3

Require that central government agencies and regional and district councils engage with Te Kotahitanga and Ngā Hapū o Te Atiawa as affected

parties on any application made under the Resource Management Act 1991 and Conservation Act 1987 which affect indigenous biodiversity and taonga species.

Gen. Pol. TTTT1.4

Require that central government agencies and regional and district councils take into consideration the incremental and cumulative effects of activities such as discharges, abstractions, diversion of waterways, barriers to fish passage and introducing exotic species on mahinga kai when developing planning documents, and assessing resource consents.

Gen. Pol. TTTT1.5

Support Te Atiawa in the development and use of mātauranga Māori monitoring techniques of indigenous biodiversity and taonga species within our Te Atiawa rohe.

MAHINGA KAI

Te Take - Issue

Issue TTTT1: The loss of mahinga kai areas and species as a result of habitat loss, discharges, abstractions, diversion of waterways, barriers to fish passage and introduction of exotic species is impacting on Te Atiawa values, and our health and wellbeing.

The objectives and policies to address this issue within the rohe of Te Atiawa are:

Ngā Paetae - Objectives

Ob. TTTT1.1

Improving the health of our waters, freshwater, coastal and marine, will support mahinga kai, and the health and wellbeing of our people

Ngā Kaupapa - Policies

Pol. TTTT1.1

Require restoration of mahinga kai areas and species, and preserve the tikanga associated with these resources, by:

- a) integrating mahinga kai objectives into planning documents;
- b) developing and implementing restoration projects;
- c) conducting wānanga to teach our future kaitiaki about our mahinga kai traditions; and

- d) identify and support options for restoring populations of mahinga kai species.

Pol. TTTT1.2

Require that central government agencies and regional and district councils plans include provisions to protect, enhance and extend existing mahinga kai habitats such as reef structures, estuaries, remnant wetlands, waipuna, riparian margins and native forest.

Pol. TTTT1.3

Encourage that landowners protect remnant areas of indigenous biodiversity to connect species and habitats.

NATIVE BIODIVERSITY

Te Take - Issue

Issue TTTT2: The loss of native biodiversity and taonga species is affecting Te Atiawa values and the health of our land, water and people.

The objectives and policies to address this issue within the rohe of Te Atiawa are:

Ngā Paetae - Objectives

Ob. TTTT2.1

Support General Objectives which provide for Te Tai o Tāne Tokorangi, Te Tai Awhi-Nuku, Te Tai o Maru and Te Tai o Tangaroa.

Ngā Kaupapa - Policies

Pol. TTTT2.1

Require acknowledgement of Te Tiriti o Waitangi as the basis for the relationship between the regional and district councils all other relevant authorities and Te Atiawa with regard to managing native biodiversity.

Pol. TTTT2.2

Require the Department of Conservation, regional and district councils and all other relevant authorities, work with Te Atiawa to protect, enhance and restore native biodiversity.

Pol. TTTT2.3

Require that the intellectual property rights of indigenous biodiversity remains in the possession of Te Atiawa.

Pol. TTTT2.4

Require the Department of Conservation, regional and district councils and other relevant authorities recognise and provide for Te Atiawa cultural values when identifying areas with significant indigenous biodiversity value.

Pol. TTTT2.5

Promote the principle of Ki Uta Ki Tai (from mountain to sea) as a culturally appropriate approach to establishing corridors of native biodiversity in the region.

RESTORATION OF NATIVE BIODIVERSITY

Te Take - Issue

Issue TTTT3: Due to the loss of native biodiversity there is a need for species restoration initiatives.

The objectives and policies to address this issue within the rohe of Te Atiawa are:

Ngā Paetae - Objectives

Ob. TTTT3.1

Protect and enhance natural landscapes and native species and therefore enhance the mauri of the land and these species.

Ngā Kaupapa - Policies

Pol. TTTT3.1

Require the Department of Conservation and the regional council to take into account Te Atiawa mahinga kai objectives when planning restoration projects.

Pol. TTTT3.2

Require that when planning restoration projects the flora and fauna is appropriate to that area.

Practise note: It is anticipated that the implementation of this policy will require techniques such as ecosourcing.

Pol. TTTT3.3

Require recognition of Te Atiawa's cultural, spiritual and traditional association with native species when planning restoration projects.

Pol. TTTT3.4

Require engagement with Te Atiawa when planning native bird restorations projects to translocate and release species in our Te Atiawa rohe or transfer species from our Te Atiawa rohe to other rohe.

WEED AND PEST MANAGEMENT

Te Take - Issue

Issue TTTT4: The introduction of weeds and pest can generate adverse effects on the survival of our native biodiversity.

The objectives and policies to address this issue within the rohe of Te Atiawa are:

Ngā Paetae - Objectives

Ob. TTTT4.1

Eradicate introduced weeds and pests that are causing adverse effects to protect and enhance our native biodiversity whilst avoiding adverse effects on the environment and species.

Ngā Kaupapa - Policies

Pol. TTTT4.1

Require the protection, maintenance and restoration of indigenous species as a key focus of weed and pest management.

Pol. TTTT4.2

Require the use of natural solutions including trapping possums; establishment of riparian margins for shading aquatic weed) over the use of hazardous substances, where feasible.

Pol. TTTT4.3

Require timing and techniques that avoid or reduce the impact of pest control operations on indigenous biodiversity and other cultural values.

Pol. TTTT4.4

Require that central government agencies and regional and district councils weed management programmes avoid effects on indigenous biodiversity, and wāhi tapu/wāhi taonga, urupā and sites of significance to Māori. This may include but is not limited to:

- a) avoiding areas identified by Te Atiawa and utilising alternative methods in these areas; and
- b) timing operations in accordance with Te Atiawa

advice.

PEST CONTROL WITH TOXINS

Te Take - Issue

Issue TTTT5: There are concerns about the use of toxins as a method of pest control, and the impacts it can generate on our ancestral lands, waters and species.

The objectives and policies to address this issue within the rohe of Te Atiawa are:

Ngā Paetae - Objectives

Ob. TTTT5.1

Support General Objectives which provide for Te Tai o Tāne Tokorangi, Te Tai Awhi-Nuku, Te Tai o Maru and Te Tai o Tangaroa.

Ngā Kaupapa - Policies

Pol. TTTT5.1

Te Atiawa may support the use of toxins if the following can be determined:

- a) the timing and design of operations reflect local conditions;
- b) toxins will be used in conjunction with other methods such as shooting or trapping, to maximise success;
- c) non target impacts are identified, including those identified by Te Atiawa;
- d) Te Atiawa are engaged early and are involved in setting priorities and designing operations, including monitoring; and
- e) there is an actual environmental or cultural benefit for the use of toxins.

Pol. TTTT5.2

Support an investigation into the effects of and alternatives to using toxins.

Pol. TTTT5.3

Avoid the use of toxins in areas which could be managed by shooting or trapping pests.

Pol. TTTT5.4

Encourage the use of incentives for people to trap or shoot pests in accessible areas.

Attachment 2: Email from Taranaki Regional Council to iwi authorities

From: Joe Mack

Sent: Tuesday, 8 September 2020 4:40 PM

To: 'paulsilich2@gmail.com' <paulsilich2@gmail.com>; 'office@ngatimutunga.iwi.nz' <office@ngatimutunga.iwi.nz>; 'tari@teatiawa.iwi.nz' <tari@teatiawa.iwi.nz>; 'holden.hohaia@xtra.co.nz' <holden.hohaia@xtra.co.nz>; 'whare@taranaki.iwi.nz' <whare@taranaki.iwi.nz>; 'info@ngaruahine.iwi.nz' <info@ngaruahine.iwi.nz>; Haimona Maruera (haimona.maruera@ruanui.co.nz) <haimona.maruera@ruanui.co.nz>; 'tumu.whakarae@rauru.iwi.nz' <tumu.whakarae@rauru.iwi.nz>; 'bella@maniapoto.co.nz' <bella@maniapoto.co.nz>

Cc: Steve Ellis <Steve.Ellis@trc.govt.nz>; Chris Spurdle <chris.spurdle@trc.govt.nz>; Sam Tamarapa <Sam.Tamarapa@trc.govt.nz>

Subject: To the Chief Executive: Mustelid rule discussion - Pest Management Plan for Taranaki

Tēnā koutou

Following approval by Taranaki Regional Council to commence a partial review of the Pest Management Plan for Taranaki, officers are seeking your views on the merits or otherwise of including mustelids (stoats, ferrets, weasels) in the Plan and having a rule requiring land occupiers to control them. This feedback will inform the preparation of a proposal prior to public notification and a formal submission process.

We have drafted the attached document for your information and to aid early discussion, Please feel free to contact our Policy Manager Chris Spurdle chris.spurdle@trc.govt.nz with any questions or comments at your convenience.



Nāku noa nā

Steve Ellis

Environment Services Manager

Taranaki Regional Council

47 Cloten Road | Private Bag 713 | Stratford 4352, New Zealand

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Working with people | caring for Taranaki



**Taking Taranaki
forward**

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When replying please quote: 8437756

10 December 2020

The Chief Executive
Taranaki Regional Council
Private Bag 713
STRATFORD

Dear Sir

**PROPOSAL FOR INCLUSION OF MUSTELIDS IN THE REGIONAL PEST
MANAGEMENT PLAN FOR TARANAKI**

New Plymouth District Council (NPDC) thanks the Taranaki Regional Council (TRC) for the opportunity to submit on the proposal to declare mustelids to be pests in the Taranaki region and to amend the Regional Pest Management Plan for Taranaki (RPMP) accordingly.

NPDC supports the proposal to incorporate a sustained control management programme for ferrets, stoats, and weasels into the RPMP. NPDC has been trapping mustelids in our reserves through our 'Restore New Plymouth Reserves' programme, which involves several volunteers. A total of 37 mustelids have been trapped since October 2019.

We make the following general comments on the proposed amended sections of the Plan:

General Comments

We support your review of the iwi environmental management plans prepared by Te Atiawa, Taranaki Tuturu, Ngā Ruanui and Ngāa Rauru and your recognition of the impact that introduced predators, such as mustelids, have on indigenous biodiversity values and taonga species. We agree that these issues are a concern for tangata whenua and that trapping methods are preferred over the use of hazardous substances where feasible.

We note that the mustelid control programme will take place in certain 'Predator Control Areas'. If these areas have already been identified, we suggest that they be mapped and included in the RPMP by way of an appendix or appendices.


Specific Comments

Section	Subsection	Issue	Comments
2.3: The new proposed programme to be inserted into section 6 of the RPMP, page 5	6.6A, 'Towards Predator Free Taranaki'	Fourth paragraph refers to "targeting mustelids and rats."	Question whether the wording should include reference to rats, as they are not part of the proposal.
2.3: The new proposed programme to be inserted into section 6 of the RPMP, page 7	6.6A, 'Explanation of rule'	Last line: "Contravention of rules 3 and 4 ..." yet only rule 3 is included on the facing page.	Amend actual rules and rule reference so that they align.
2.4: An amended section 9.1 [Measuring what the objectives are achieving], page 8	6.6A, 'Measuring what the objectives are achieving] (c)	Item (c) refers to possum control in Egmont National Park.	Should mustelids also be included?
3: 'Cost benefit analysis for sustained control programme for mustelids', page 11	3.2, 3.3 and 3.4	There are minor typos in this sub-section.	Amend as appropriate if not already corrected.
3.5 'Who should pay?', page 14		Second paragraph: "Land occupiers with infestations are the principal exacerbators of the problem."	Suggest this wording could be amended as follows: "Land occupiers who are <u>not managing</u> infestations <u>on their property</u> are the principal exacerbators of the problem."

Once again, we thank you for the opportunity to make comments on your proposal to include a sustained control programme for mustelids in the RPMP, and we wish you well in your endeavours.

Yours faithfully

Nāku noa, nā



Juliet Johnson
DISTRICT PLANNING LEAD