

Summary of Submissions: Proposed Regional Pest Management Strategies.

Note: A copy of submissions is available by request – please contact Justin Murfitt on Freephone (0800) 002 004

Proposed Marine Pest Management Strategy

Submitter	Number	Submission Summary	Relief Sought	To be Heard?
	Note: there is no MAR/1			
Ngati Kuri Trust Board	MAR/2	<p>Expresses Concern over the impact of 2 marine invasive species:</p> <p>1 <i>Eudistoma elongatum</i> in Rangaunu, Houhora and Parengarenga Harbours;</p> <p>2 <i>Pyura stolonifera</i> at Twilight and Te Werahi Beaches near Cape Maria Van Dieman and the Bluff on Ninety Mile Beach.</p> <p>Concerns specifically relate to:</p> <ul style="list-style-type: none"> - impacts upon customary, recreational and commercial mussel & oyster fisheries. - Impacts of competition/smothering. - Sustainability of natural & developed ecosystems. 	Seeks that the study and eventual eradication of these pests be a priority.	Not stated
Te Aupouri Fisheries Trust	MAR/3	As per Submission MAR/2	As above re MAR/2	Not stated
Nga Taonga o Ngai Takoto	MAR/4	As per Submission MAR/2	As above re MAR/2	Not stated

Far North Holdings Limited	MAR/5	<ul style="list-style-type: none"> - Supports the purpose of the Proposed Marine Pest Strategy - Supports the objectives of the strategy however considers devolving responsibility to local people will not be effective in some circumstances – recommends that this be acknowledged in the strategy. - Advises FNHL is willing and able to assist with both monitoring and education. - Advises that the strategy should not create a disincentive for those who contribute to monitoring, surveillance, education and control. - FNHL supports funding the strategy via regional rates. - Considers 'public good' should dominate in costs associated with eradication and such incursion responses should be publicly funded. 	<p>MAR/5.1 Seeks acknowledgement that a public response to marine pests will not be effective in all circumstances.</p> <p>MAR/5.2 Seeks that the strategy avoids creating a disincentive for surveillance, education and control by stakeholders.</p> <p>MAR/5.3 Seeks costs of eradication/incursion responses be publicly funded.</p>	No
Northland Conservation Board	MAR/6	Supports Proposed Marine Pest Management Strategy.	None stated	No
Kerikeri Cruising Club	MAR/7	<ul style="list-style-type: none"> - Strongly opposed to liability for pest management falling to the Cruising club. - Suggests all boats arriving in NZ are screened for marine pests. - Advises all natural and artificial structures can provide habitat for marine pests and marinas should not be singled out. - Advises that the club's resource consent relating to the existing haul-out restricts the ability to clean vessels. 	<p>MAR/7.1 Opposes any liability for removal of marine pests on the Kerikeri Cruising Club.</p> <p>MAR/7.2 Seeks that all boats visiting NZ are screened for marine pests and cleaned where required.</p>	Yes
Northland Underwater Technical Services	MAR/8	<ul style="list-style-type: none"> - Advises that Northland Underwater Technical Services has played a role in responding to marine pest incursions in association with NRC, MAF BNZ and NIWA. - Advises that NRC has an advantage in managing marine pests via ability for a speedy response, local knowledge and cooperative relationships with frontline stakeholders. 	<p>MAR/8.1 Seeks NRC take a proactive approach to surveillance and liaise with industry regarding education, reporting.</p> <p>MAR/8.2 Seeks swift response to incursions.</p>	No

Bream Bay Action Group Inc	MAR/9	<ul style="list-style-type: none"> - Identifies NRC and MAF BNZ as lead authorities for managing marine pests, but cooperation is required from owners of marine facilities and the general public particularly the boating fraternity. - Suggests effective pest control requires the following strategies: Prevention and Eradication/Containment. - Suggests prevention should include education/signage and regular underwater surveillance. - Suggests eradication of pests should be the ultimate aim of any pest control programme. - Suggests greater cooperation with Auckland agencies and boating public is essential to prevent further incursions. 	<p>MAR/9.1 Opposes suppression of <i>Styela clava</i> and seeks eradication of this species.</p> <p>MAR/9.2 Seeks regular underwater surveillance of marine structures.</p> <p>MAR/9.3 Seeks more signage and education.</p> <p>MAR/9.4 Seeks greater level of research on <i>Styela clava</i>.</p> <p>MAR/9.5 Seeks cooperation between NRC and ARC and other Auckland agencies to limit spread of marine pests.</p>	Yes
Mangawhai Harbour Restoration Society Inc	MAR/10	<ul style="list-style-type: none"> - Advises that mangroves impact upon local values such as access to waterways, recreational use and the environment. - Suggests that pacific oysters be included in a CPCA for Mangawhai Harbour and states that 'public awareness' of impacts of pacific oyster is inadequate. 	<p>MAR/10.1 Seeks that mangroves be included as a unwanted plant.</p> <p>MAR/10.2 Seeks that mangroves be included as a CPCA pest.</p> <p>MAR/10.3 Seeks promotion of methods to control and eradicate mangroves.</p> <p>MAR/10.4 Seeks that pacific oysters be subject to a CPCA in the Mangawhai Harbour.</p>	No
Northern Branch, Royal Society of Forest and Bird	MAR/11	<ul style="list-style-type: none"> - Advises that the objectives for <i>Styela clava</i> are inadequate and recommends the strategy aim to eradicate <i>Styela clava</i> where it has established with Marsden Cove marina as a priority to prevent further spread. - Supports raising public awareness of the impacts of <i>Styela clava</i> including signage detailing obligations and responsibilities of boat owners. - Provides background on behaviour/characteristics of <i>Styela clava</i> and recommends further study. 	<p>MAR/11.1 Seeks that the styela incursion at Marsden Cove be targeted for an eradication programme as a top priority (including recommendations for methodology).</p> <p>MAR/11.2 Seeks ongoing regular monitoring inside and adjacent to the marina.</p>	Yes

		<p>Also advises that changes in water temperature may induce styela to spawn (ie movement of a vessel to waters with different temperatures may induce spawning).</p> <ul style="list-style-type: none"> - States that the benefits of a pest strategy for styela outweigh costs given potential ecological, economic and cultural impacts – identifies impact of styela on tourism, aquaculture and commercial fishing as significant. - Suggests development of national rapid response biosecurity units. 	<p>MAR/11.3 Suggests development of national rapid response biosecurity units</p>	
Auckland Regional Council	MAR/12	<ul style="list-style-type: none"> - Supports the intended outcomes of the Proposed Marine Pest Strategy but expresses concern over jurisdictional issues, funding and implementation. - Also concerned that the strategy could set a precedent and shift expectations with implications for other regions. - States MAF BNZ is the appropriate agency to address marine biosecurity and has the administrative, research, surveillance, monitoring programme and funding responsibilities in NZ. - Considers Regional Councils taking responsibility for marine pests will reduce pressure on central government to improve its performance. - Considers the Proposed Strategy does not comply with s76.4(a) BA and is inconsistent with strategies of other regional councils. - ARC suggests NRC should focus funds on existing/emerging non-marine pests. - States no Regional Council can prevent ingress of marine pests and that only MAF BNZ has the legal ability/mandate to do this. - Suggests NRC adopt a role as delivery agent in implementing a national MAFBNZ programme funded and managed by MAFBNZ which does not require a strategy. - Suggests greater clarity is required around eradication pests when responsibility is given to users of coastal space. - Suggests users of the CMA may not be the only 	<p>MAR/12.1 Seeks NRC not adopt the Proposed Marine Pest Management Strategy.</p> <p>MAR/12.2 Suggests instead that NRC consider options including education, identification of pathways, stakeholders etc to limit risk/spread.</p> <p>MAR/12.3 Suggests the NRC work with other regional councils to obtain MAFBNZ agreement to fund and coordinate marine biosecurity.</p>	Yes

		<p>beneficiaries and that further explanation/ justification of why financial/pest response duties are imposed on users of space in the CMA is required.</p> <ul style="list-style-type: none"> - Suggests costs of the strategy need to be clarified. - Queries reference to s100 in the strategy and suggests it is contrary to the intent of the Act. - Queries use of rates to fund the strategy when beneficiaries include the Crown and territorial authorities which do not pay rates. Also suggests that it is unfair that major exacerbaters are excluded from the funding source. 		
Don McKenzie NRC - Biosecurity Senior Programme Manager.	MAR/13	Advises that Section 131 of the Biosecurity Act provides for Controlled Areas to be declared to reduce risk of unwanted organisms spreading.	MAR/13.1 Seeks that application of section 131 of the BA is considered in the Marine Strategy.	Yes
Environment Waikato	MAR/14	See submission MAR/12 above (ARC)	<p>MAR/14.1 Seeks NRC not adopt the Proposed Marine Pest Management Strategy.</p> <p>MAR/14.2 Suggests instead that NRC consider options including education, identification of pathways, stakeholders etc to limit risk/spread.</p> <p>MAR/14.3 Suggests that NRC work with other regional councils to obtain MAF BNZ agreement to fund and coordinate marine biosecurity.</p>	No
MAF Biosecurity NZ	MAR/15	<ul style="list-style-type: none"> - MAF BNZ generally supports the strategy. - Supports Section 2.2 but advise that it is more applicable to terrestrial situations than marine – exacerbaters are more likely to be transient. - Suggests more explanation on NRC's responsibilities in the CMA, which arise through the RMA. - Supports Section 2 but suggests greater alignment 	<p>MAR/15.1 Explain in text that marine environment is different to terrestrial in that exacerbaters are usually transient.</p> <p>MAR/15.2 Include a statement that NRC has responsibilities in the CMA via the RMA.</p>	Yes

		<p>with roles/accountabilities identified in Biosecurity Central/Regional Government Forum.</p> <ul style="list-style-type: none"> - Section 2.4: Opposes statement that Crown can be an exacerbater – suggests rewording to identify as generally a beneficiary of management. - Also suggests NRC could be seen as an exacerbater given responsibility for CMA devolved from the Crown. - Section 3.3: Supports pest categories but expresses concern that they may not fully align with other councils – suggests NRC engage in BMG peer review process. - Section 4: Advises eradication for Eudistoma and Charybdis is not likely to be feasible (BNZ trials did not work). - Undaria – queries how strategy will mitigate issues/impacts. Also advises MAF is reviewing Undaria harvest policy which may impact on management of this species. - Advises that those who occupy the CMA may not be exacerbaters – exacerbaters are generally vessels/transient structures and as such justification for the costs of control falling on these occupiers is low. - Section 4.3: Advises beneficiary pays principle may be difficult to apply given pests impact on multiple values. - Section 4.4: Supports intent of risk assessment programme but advises identification can be difficult and that NRC should work with MAF BNZ & other agencies to develop a programme. - Advises MAF BNZ is about to release finalised Pest Management Performance Measurement Framework & Landcare Research is producing a template for measuring programme effectiveness – suggests NRC engage with Landcare in development of the RPMS. - MAF BNZ acknowledge and support NRC’s active engagement in marine pest management but express concern that this is an ambitious strategy that may lack feasibility in parts (eg Eudistoma & 	<p>MAR/15.3 Align roles re marine pests with those agreed in the Central/Regional Government Biosecurity Forum</p> <p>MAR/15.4 Change Crown from exacerbater to ‘generally a beneficiary’ in section 2.4.</p> <p>MAR/15.5 Engage in BMG peer review process</p> <p>MAR/15.6 Include a statement that surveillance for potential pests is difficult and that NRC will work with MAF BNZ and other agencies to develop an appropriate surveillance programme which complements national programmes.</p>	
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		Charybdis) and raise expectations that cannot be fulfilled.		
Department of Conservation	MAR/16	<ul style="list-style-type: none"> - Advises there should be acknowledgement of where the invasion curve is derived from (Adapted from Williams 1997) to confirm this is an established model. - Pest classification: Exclusion: Advises that NRC will need to do more than surveillance, research and education to prevent new marine pests establishing – vessels & equipment must be quarantined and decontaminated. - Advises that the strategy needs to enable/promote greater cooperation between regional councils to prevent movement of pests between regions. - Requests the acronym CMA be expanded for clarity. - Supports pest management methods. - Unwanted organisms – the NPPA information should be removed from this section as it does not apply to marine pests and may cause confusion. - Marine Pests - the Department supports the inclusion of all the species in the table. - Marine exclusion pests – NRC needs to be more proactive in prevention – requests that vessels, equipment and other items entering the CMA shall be decontaminated before entering northland waters. - Marine Containment Pests: Requests that <i>Pyura stolonifera praeputialis</i> be added as a containment species. Suggests a rule requiring “all vessels, equipment and other material that have been in the vicinity of pyura shall be decontaminated before leaving the site.” - Marine Suppression Pests: Asian paddle crab, didemnum, eudistoma, styela – the objective for these is more appropriate for the containment category – suggests these species be included in the containment category instead of suppression. - Undaria – suggests undaria be identified as an exclusion pest. 	<p>MAR/16.1 Seeks credit for source of invasion curve (Williams 1997).</p> <p>MAR/16.2 Requests more active approach to addressing exclusion category pests – ie decontamination of vessels, equipment etc prior to entering Northland waters or at a quarantine site.</p> <p>MAR/16.3 Expand acronym CMA to coastal marine area.</p> <p>MAR/16.4 Remove NPPA reference from section 3.4 as it could cause confusion.</p> <p>MAR/16.5 Include pyura as a containment species to prevent spread.</p> <p>MAR/16.6 Seeks proactive rules to prevent new marine pests establishing in Northland – eg rules requiring decontamination prior to entering Northland waters.</p> <p>MAR/16.7 Seeks rule requiring vessels, equipment etc that have been in the vicinity of the pyura incursion be decontaminated before leaving the site to prevent spread.</p> <p>MAR/16.8 Seeks Asian paddle crab, didemnum, eudistoma and styela be included as containment pests.</p> <p>MAR/16.9 Seeks undaria be an exclusion pest.</p>	Yes

Summary of Submissions: Proposed Plant & Animal Pest Management Strategies.

Note: Due to the fact that many submitters addressed both the Proposed Plant and Proposed Animal Pest Strategies in the same submission, submissions on these two strategies are presented together below. Where possible, the relief sought is related to either the Proposed Plant or Animal Pest Strategies.

Submitter	Number	Submission Summary	Relief Sought	To be Heard?
Bruce Rogan	PLA/1	Asserts that the Proposed Plant and Animal Pest strategies are unnecessarily long winded and lack specifics.	Plant and Animal Strategies Seeks prioritisation of pests and shift to more succinct, goal oriented strategy.	No
Graeme Bill	PLA/2	States there should be consistency between regions with regard to pest plant management and greater emphasis on control of pest plants by NRC in Northland given sub-tropical climate.	Proposed Plant Strategy Seeks greater NRC control of weed species such as ginger, woolly nightshade and pampas via the Proposed Plant Pest Strategy.	No
Brown Teal Conservation Trust	PLA/3	<ul style="list-style-type: none"> - Suggests an overall pest plan for Northland be developed. - Also suggests intensive pest control be focussed within an expanding 'environmental park'. 	Plant and Animal Strategies PLA/3.1 Seeks establishment of an 'environmental park' with collaboration of landowners and government agencies. Proposed Animal Strategy Seeks greater emphasis on possum and predator control in the Animal Pest Strategy.	Yes
Northland Conservation Board	PLA/4	Supports the proposed Plant and Animal pest strategies but recommends several species be included.	Proposed Plant Strategy PLA/4.1 Seeks wilding pines be included in the plant pest strategy. PLA/4.2 Proposed Animal Strategy Seeks mynas, magpies and rainbow skinks be included in the animal pest strategy.	No
Kaitaia Croquet Club	PLA/5	Expresses concern over moth plant in Kaitaia	Proposed Plant Strategy Seeks moth plant be eradicated (plant strategy).	No
Royal Forest & Bird Society: Northern Branch	PLA/6	<ul style="list-style-type: none"> - Recommends 'high value areas' (Natural Areas of Ecological Significance) be identified within Northland. - Recommends the Biodiversity Database 	Proposed Plant Strategy Seeks agapanthus be banned from sale (plant strategy).	Yes

		currently being developed be used to identify ecological values.		
Whangarei Heads Landcare	PLA/7	<ul style="list-style-type: none"> - Advises property owners who do not address weeds place an unfair burden on neighbours and community groups. - Advises large areas of woolly nightshade, privet, palm grass and Taiwan cherry are a problem in Parua Bay and the Nook. - Suggests more publicity on boundary control plants/obligations. 	<p>Proposed Plant Strategy</p> <p>PLA/7.1: Seeks greater enforcement for plant pest exacerbaters in Plant strategy.</p> <p>PLA/7.2: Seeks queen of the night, Phoenix palm, Bangalow palm and flame tree be banned from sale via plant strategy.</p>	Yes
Whangarei District Council	PLA/8	<ul style="list-style-type: none"> - Advises WDC has a significant role in pest animal and pest plant management via significant land holdings. - Suggests prioritising pest management on the basis of 'highest benefit'. - Supports pest classifications described in section 3.3. - Does not support proposed approach to plant pest control in road corridors – suggests prioritisation on the basis of benefit/values. - Advises proposed control of roadside plant pests provides no certainty as to costs for WDC. - Suggests that if NRC wishes to retain full discretion over the control of pest plants in the road network, then it should also be responsible for funding. - Recommends differentiating responsibilities for unformed and formed roads – with occupier responsible for unformed roads. 	<p>Proposed Plant Strategy</p> <p>PLA/8.1 (a) Seeks definition of the values identified in 3.1 (introduction to both strategies). (b) Seeks amendment to identify those areas with the highest 'benefit' with the values in 3.1 used as criteria. (c) That the highest benefit areas form the basis for pest control via the RPMS.</p> <p>PLA/8.2 Seeks removal of Rule 5 (Roadside control) as it applies to gorse, pampas and ginger.</p> <p>PLA/8.3 Seeks an analysis of alternative methods to control plant pests in road reserves prior to setting rules, in particular on the basis of high values/benefits.</p> <p>PLA/8.4 Seeks that funding for control of gorse, pampas and ginger in road reserves be the responsibility of NRC.</p> <p>PLA/8.5 Seeks amendment to Pest Management Methods (p71) to: "NRC will assist communities and stakeholders to control species where they impact on local values <i>and will actively promote and fund the establishment of CPCA's in areas of high value.</i>"</p> <p>PLA/8.6 Seeks Brazilian pepper tree (<i>Schinus terebinthifolius</i>) be removed from Section 4.6, Table 3.</p>	Yes
Winstone	PLA/9	<ul style="list-style-type: none"> - Supports principle in Proposed Plant Pest 	Proposed Plant Strategy	Yes

Aggregates		<p>Strategy of applying additional controls where land use may exacerbate plant pest problems, but expresses concern over wording in Section 3.4 Pest Management Methods - Occupier Control.</p> <ul style="list-style-type: none"> - Advises a 50m buffer for control zone for gorse in quarries is not necessary in all situations, particularly where adjoining bush. 	<p>PLA/9.1 Seeks amendment to Proposed Plant Pest Strategy quarry control term to: “<i>Quarry Control: Owners or occupiers of quarries and metal stockpile areas are required to control certain pests within operational areas. Operational areas include overburden soil storage stockpiles, pits and faces, extraction areas, raw material stockpiles, processing areas, product stockpiles, haulways and other vehicle routes.</i>”</p> <p>PLA/9.2 Seeks amendment to Proposed Plant Pest Strategy quarry control for gorse (Rule 4b) to: “<i>Destroy all gorse in the work and stockpile areas and a 50 metre strip of land around the work or stockpile areas of a quarry, or 10 metres into any area of native bush, whichever is closer.</i>”</p>	
Auckland Regional Council	PLA/10	<ul style="list-style-type: none"> - Supports the Proposed Plant and Animal Pest Management Strategies in principle. - Advises the manner in which pest control is undertaken in Northland can affect the Auckland region. - Seeks amendments to avoid spill-over effects and for consistency across the two regions. - Advises Cape tulip has human health impacts which should be assessed as a high due to fatalities. - Advises Senegal tea has high impact on drainage, water quality and access similar to Alligator Weed. - Advises the botanical description and details for eelgrass should be updated due to taxonomic revision. - Opposes African feather grass being changed from Total Control (eradication) to Containment as it has the highest threat of any grass species in NZ. - Advises nodding thistle and Californian thistle have high level impacts on pasture production and stock health elsewhere in New Zealand. - Opposes Manchurian wild rice being changed 	<p>Proposed Plant Strategy</p> <p>PLA/10.1 Seeks retention in the Plant Strategy of the wording in the current strategy relating to roadside control plants to make it clear that pest plants in road corridors are the responsibility of the roading authority.</p> <p>PLA/10.2 Seeks that clarification in the Plant Pest Strategy that rail corridor occupiers are bound by the Biosecurity Act and any rules relating to responsibility for pest plants so as to be consistent with the ARC strategy.</p> <p>PLA/10.3 Seeks the following be included as exclusion plants: Asiatic knotweed (<i>Reynoutria japonica</i>; <i>R.sachalinensis</i>) Purple loosestrife (<i>Lythrum salicaria</i>) Royal fern (<i>Osmunda regalis</i>) Cathedral bells (<i>Cobaea scandens</i>) Climbing spindleberry (<i>Celastrus orbiculatus</i>) If any of the above exist in Northland they should be identified as eradication plants in section 4.2.</p> <p>PLA/10.4 Seeks amendments to the impact assessment for Cape tulip, Senegal tea, nodding thistle and Californian thistle</p> <p>PLA/10.5</p>	Yes

		<p>from Total Control (eradication) to Containment.</p> <ul style="list-style-type: none"> - Advises impact of koi carp on soil and water can be high due to sediment disturbance. 	<p>Seeks that the Containment zone for African feather grass be mapped and all other sites be identified for eradication. PLA/10.6</p> <p>Seeks that the containment zone for Manchurian wild rice be mapped and all other sites be identified for eradication. PLA/10.7</p> <p>Seeks the ban from sale for the following pest plants: Agapanthus (large forms) <i>Agapanthus praecox</i> syn <i>orientalis</i> Arum lily <i>Zantedeschia aethiopica</i> Phoenix palm <i>Phoenix canariensis</i> Norfolk Island hibiscus <i>Lagunaria patersoni</i> English ivy <i>Hedera helix</i> subsp. <i>Helix</i> PLA/10.8</p> <p>Seeks deletion of Table 2 in Section 4.5 and the following species to be placed in Table 1: Agapanthus (large forms) <i>Agapanthus praecox</i> syn <i>orientalis</i> Arum lily <i>Zantedeschia aethiopica</i> Phoenix palm <i>Phoenix canariensis</i> And the following in the Risk Assessment Plants list: Queen of the night <i>Cestrum nocturnum</i> Coral/flame tree <i>Erythrina x sykesii</i> Bangalow palm <i>Archontophoenix cunninghamiana</i> Elodea <i>Elodea Canadensis</i></p> <p>Proposed Animal Strategy PLA/10.9</p> <p>Seeks the following animal pests be included in the eradication category: Blue tongued skink <i>Tiliqua scincoides</i>, <i>T. nigolutea</i> (Also ban from sale and distribution but allow existing pets to be kept for natural life) Sulphur crested cockatoo <i>Cacatua galerita</i> (Allow trade and pets but ban release and eradicate wild populations). PLA/10.10</p> <p>Seeks amendments to the impact assessment for koi carp.</p>	
Ministry of Fisheries	PLA/11	<ul style="list-style-type: none"> - Suggests pest management roles of the Crown be further explained in Section 2, particularly in relation to MAF BNZ and MFish. - Supports categories identified in the animal pest strategy for freshwater animal pest 	<p>Proposed Animal Strategy PLA/11.1</p> <p>Suggest that Caudo (a gambusia look-a-like) may also need to be included as a pest species.</p>	No

		<p>species.</p> <ul style="list-style-type: none"> - Highlights potential for collaborative management of freshwater fish between MFish and local government as MFish plays a role in education and management of pests. - Advises that MFish has the ability to impose emergency measures to manage pest species. Also advises that permits may be required where management of pest fish requires undersize mesh, pesticides or unauthorised bycatches. 		
MAF Biosecurity New Zealand	PLA/12	<ul style="list-style-type: none"> - Advises MAF BNZ is about to release finalised Pest Management Performance Measurement Framework & Landcare Research is producing a template for measuring programme effectiveness – suggests NRC engage with Landcare in development of the RPMS. - Advises MAF BNZ has developed a national surveillance strategy for marine, terrestrial and freshwater environments. - Advises animal welfare is an increasing concern in relation to pest control, which should be acknowledged in the animal pest strategy. 	<p>Proposed Animal Strategy PLA/12.1 The statement on the detrimental effects of the strategy should acknowledge potential adverse effects on animal welfare.</p> <p>PLA/12.2 The statement on the effects of the strategy on the marketing overseas of New Zealand products should recognise growing international awareness of the animal welfare impacts of pest control.</p>	Not stated
Whangarei Heads Landcare Forum	PLA/13	Supports site-led control methods (CPCA & high value areas)	<p>Proposed Plant and Animal Strategies PLA/13 Retain proposed provisions to enable site-led plant and animal pest control methods.</p>	Yes
Graham Taylor	PLA/14	Supports inclusion of feral pigs in the proposed animal strategy but seeks further control due to potential impacts such as spread of Bovine TB and Leptospirosis and effects of ecological values.	<p>Proposed Animal Strategy PLA/14 Seeks greater publicity on the risks and impacts of wild pigs and greater enforcement/penalties for the release/distribution.</p>	No
Julia Sutherland & Colin Bennett	PLA/15	Concern over impact of mangroves on Northland's coastal waterways and seeks that mangrove is classified as a pest within the plant strategy in a similar manner to spartina which is asserted to have similar impacts.	<p>Proposed Plant Strategy PLA/15 Seeks mangroves be included in the proposed plant pest strategy as a containment or suppression pest plant.</p>	Yes

Department of Conservation	PLA/16	<ul style="list-style-type: none"> - Supports the general direction of both the Proposed Plant Pest and Animal Pest Strategies but seeks changes to pest categories for various species and addition of several plant and animal pests with supporting information. - Advises that a species of spartina (<i>S. townsendii</i>) has been found North of the Kaipara at Rangaunu Harbour and recommends amending the description of spartina accordingly. - Recommends legal status under Biosecurity Act be stated for all species in both the Plant and Animal Strategies - Supports inclusion of pigs into suppression category, but expresses concern that the rules may prove ineffective. - Advises that <i>Gambusia affinis</i> are widespread in Northland and have potentially high ecological impact, particularly upon native freshwater fish. - Support the supply of pest control products by NRC at cost, but advises that products and advice should be current industry best practice. 	<p>Proposed Plant Strategy</p> <p>PLA/16.1 Seeks holly-leaved senecio (<i>Senecio glastifolis</i>) be included in the exclusion plant category.</p> <p>PLA/16.2 Seeks the following plants be included in the eradication category and be banned from propagation, sale and possession and sightings to be reported: Climbing spindleberry (<i>Celastrus orbiculatus</i>) Monkey musk (<i>Mimulus guttatus</i>)</p> <p>PLA/16.3 Seeks that African feather grass be moved from the containment category to the eradication category.</p> <p>PLA/16.4 Seeks the following plants be included in the containment category and be banned from propagation, sale and possession and sightings to be reported: Chocolate vine (<i>Akebia quinata</i>) Kangaroo acacia (<i>Acacia paradoxa</i>) Dusky coral pea (<i>Kennedia rubicunda</i>) Fork leaved/sweet scented hakea (<i>Hakea drupacea</i>) Himalayan feather grass (<i>Miscanthus nepalensis</i>) Mickey mouse plant (<i>Ochna serrulata</i>) Mile-a-minute (<i>Dipogon lignosus</i>) Sydney golden wattle (<i>Acacia longifolia</i>) Yellow flag iris (<i>Iris pseudacorus</i>)</p> <p>PLA/16.5 Seeks the following plants be added to the Suppression Plant list: Moth plant (<i>Araujia sericifera</i>) Cape honey flower (<i>Melianthus major</i>) Queensland poplar (<i>Homolanthus populifolius</i>)</p> <p>PLA/16.6 Seeks the following plants be added in to the Community Pest Control Category: Mile-a-minute (<i>Dipogon lignosus</i>) Blue passion flower (<i>Passiflora caerulea</i>) Chinese windmill palm (<i>Trachycarpus fortunei</i>) Chocolate vine (<i>Akebia quinata</i>) Climbing spindleberry (<i>Celastrus orbiculatus</i>)</p>	Yes
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Federated Farmers	PLA/17	- Advises that a balance between controlling pests on the basis of environmental and economic harm is required.	<p>Proposed Plant Strategy PLA/17.1 Supports including spartina in the eradication category.</p>	Yes

		<ul style="list-style-type: none"> - Advises that in the longer term society as a whole benefits from the control of pests and as such society as a whole should contribute to costs. - Asserts that exacerbaters of plant pests are most often those who introduce and distribute amenity and horticultural plants. - Supports use of uniform general charge and targeted rate to fund biosecurity work. - Supports pest control on unformed roads being the responsibility of the occupier and pest control on formed roads being the responsibility of the road controlling authority. - Supports pest control within rail corridors being the responsibility of the occupier. Where land is used for the rail network, the submitter supports the rail network operator having responsibility for pest control within the rail corridor. - Supports the use of biological control agents where appropriate. - Advises cooperation between NRC and ARC is required in relation top spartina in the Kaipara Harbour. - Advises mangroves can cause flooding due to channel blockage. 	<p>PLA/17.2 Seeks alligator weed be subject to a higher level of control than suppression.</p> <p>PLA/17.3 Seeks mangroves be included in the risk assessment category.</p> <p>Proposed Animal Strategy</p> <p>PLA/17.4 General support for the proposals for the control of the following species in the Proposed Animal Strategy: Rooks Feral Deer Feral Cats Feral Goats Feral Pigs Mustelids Possums (Notes that a balance between economic and environmental aims is required in relation to this pest)</p> <p>PLA/17.5 Seeks that magpies be included in the Risk Assessment category.</p>	
Dr Keith Corbett	PLA/18	<ul style="list-style-type: none"> - Advises that the impact of pampas grass is overstated and that it provides beneficial refuge for native lizards. - Advises that removal/control of pampas may disturb native lizards in a manner contrary to the Wildlife Act. 	<p>Proposed Plant Strategy</p> <p>PLA/18.1 Seeks additional text on pampas grass describing the refuge function pampas plays for native lizards.</p> <p>PLA/18.2 Seeks additional rule relating to pampas requiring surveys for native lizards and geckos prior to control of pampas and where such lizards are present a requirement for planting of native alternatives such as toetoe and flax.</p>	Yes
Maungakaramea Landcare Group	PLA/19	<ul style="list-style-type: none"> - Advises that Genetically Modified Organisms (GMO's) can result in herbicide resistant 'superweeds'. - Suggests GMO's could have serious impacts 	<p>Proposed Plant and Animal Strategies</p> <p>PLA/19.1 Seeks that NRC utilise the Protected Natural Area Programme (PNAP) in identifying priorities for pest control.</p>	Yes

		on Northland's economy and environment.	Proposed Plant Strategy PLA/19.2 Seeks that GMO plants be included in the either containment or eradication category in the Proposed Plant Strategy.	
Far North District Council (Infrastructure & Asset Management Group)	PLA/20	<ul style="list-style-type: none"> - Advises FNDC has an important strategic role in pest management via land holdings and road reserves. - Suggests prioritising pest management on the basis of 'highest benefit'. - Does not support proposed approach to plant pest control in road corridors – suggests prioritisation on the basis of benefit/values. - Advises proposed control of roadside plant pests provides no certainty as to costs for FNDC. - Suggests that if NRC wishes to retain full discretion over the control of pest plants in the road network, then it should also be responsible for funding. - Notes that Brazilian pepper tree (<i>Schinus terebinthifolius</i>) is on the National Plant Pest Accord (NPPA), which implies a greater pest category than risk assessment is required. - Recommends differentiating responsibilities for unformed and formed roads – with occupier responsible for unformed roads. 	Proposed Plant Strategy PLA/20.1 (a) Seeks definition of the values identified in 3.1. (b) Seeks amendment to identify those areas with the highest 'benefit' with the values in 3.1 used as criteria. (c) That the highest benefit areas form the basis for pest control via the RPMS. PLA/20.2 Seeks removal of Rule 5 (Roadside control) as it applies to gorse, pampas, privet and ginger. PLA/20.3 Seeks an analysis of alternative methods to control plant pests in road reserves, in particular on the basis of high values/benefits, prior to setting rules PLA/20.4 Seeks that funding for control of gorse, pampas, privet and ginger in road reserves be the responsibility of NRC. PLA/20.5 Seeks amendment to Pest Management Methods (p71) to: "NRC will assist communities and stakeholders to control species where they impact on local values <i>and will actively promote and fund the establishment of CPCA's in areas of high value.</i> " PLA/20.6 Seeks Brazilian pepper tree (<i>Schinus terebinthifolius</i>) be removed from Section 4.6, Table 3.	No
Kaipara District Council	PLA/21	<ul style="list-style-type: none"> - Advises that the level of cost/resourcing required to implement a control programme within a 5 year management plan is significant and unnecessarily burdensome on roading resources. - Suggests that if NRC wishes to retain full discretion over the control of pest plants in the road network, then it should also be responsible for funding. - Suggests prioritising on the basis of high 	Proposed Plant Strategy PLA/21.1 Seeks removal of Rule 5 (Roadside control) as it applies to gorse, pampas and ginger. PLA/21.2 Seeks an analysis of alternative methods to control plant pests in road reserves, in particular on the basis of high values/benefits, prior to setting rules PLA/21.3 Seeks that funding for control of plant pests in the road	Yes

		<p>values is likely to be more effective.</p> <ul style="list-style-type: none"> - Expresses concern that the Proposed Animal Pest Strategy lacks detail on the control of possum and the promotion of biodiversity. - Recommends differentiating responsibilities for unformed and formed roads – with occupier responsible for unformed roads. 	network by provided by NRC.	
GE Free Northland	PLA/22	<ul style="list-style-type: none"> - Concerned that GMO's are not included in the Proposed Plant and Animal Pest Strategies. - Suggests collaboration with ARC and District Councils to maintain a GMO free region. 	<p>Proposed Plant Strategy PLA/22.1 Seeks that GMO's are included in the Proposed Plant Pest Strategies as a biodiversity risk.</p>	Yes
David Lourie	PLA/23	<ul style="list-style-type: none"> - Suggests land owners adjoining public land be able to control pests on that land where the controlling authority fails to take responsibility for the pest. - Suggests the Plant Pest Strategy requires/enables District Councils to control an extended range of plant pests in road corridors. - Suggests members of the public be enabled to control roadside pest plants without seeking adjacent landowner approval. - Suggests greater control/management of Argentine ants (methodologies suggested). - Suggests humans meet the s72 test for inclusion as a pest organism in the Animal Pest Strategy. 	<p>Proposed Plant Strategy PLA/23.1 Seeks that more funds and resources are allocated to plant pest control, with particular focus on emerging pest plants.</p> <p>Proposed Plant and Animal Strategies PLA/23.2 Seeks that pest species can be added to the strategies without the need for review of the RPMS.</p> <p>Proposed Animal Strategy PLA/23.3 Seeks that persons in possession of, trading or distributing risk assessment animals which are protected species in the country of origin must demonstrate the legality of the specimen(s). PLA23.4 Seeks that the term 'knowingly' is deleted from all Risk Assessment Animal rules and the wording of the rules is tightened up.</p>	Yes
Bream Bay Action Group Inc.	PLA/24	<ul style="list-style-type: none"> - Expresses concern over use of toxic chemicals and suggests alternative methods to control pests. - Advises cooperation between NRC, District Councils, DOC and the public is essential for effective pest management. - Advises a change in human behaviour is also required given humans are generally the major exacerbator of pest problems. 	<p>Proposed Plant Strategy PLA/24.1 Seeks amendment to approach to gorse to recognise its value in certain situations as a nursery crop for regenerating native vegetation and refuge for ground nesting native birds. PLA/24.2 Seeks a ban on the planting of Phoenix and other introduced palms in public places (eg road reserves, parks and reserves) and in subdivision and development projects.</p>	Yes

			<p>PLA24.3 Seeks the following methods be introduced for the control of pest plants:</p> <ol style="list-style-type: none"> 1) A reduction in the use of toxic herbicides accompanied by use of organic formulas and mechanical removal. 2) Public campaigns targeting particular pest plants in specific areas. 3) Free green-waste to disposal to reduce incidence of dumping and subsequent pest plant dispersal. 4) Where pest plants provide habitat for native fauna, the timing of control should exclude the nesting season or no action be considered as an option. 5) A management plan be developed where pest plants protect against erosion. 6) Regular information provision via print media on the control of pest plants. <p>Proposed Animal Strategy</p> <p>PLA/24.4 Seeks ban on use of toxins for control of pest animals (eg 1080) for humane reasons and use of hunting and instant kill traps instead.</p> <p>PLA/24.5 Seeks feral cats be live trapped and humanely euthanased, with domestic cats returned to owners where possible.</p> <p>PLA/24.6 Seeks uncontrolled dogs be included in the Animal Pest Strategy as they are a threat to both livestock and native fauna.</p> <p>PLA/24.7 Seeks use of targeted control of insect pests as opposed to non-discriminate use of pesticides with consequent by-kill of native/beneficial insects.</p> <p>General</p> <p>PLA/24.8 Seeks that NRC accepts responsibility for harm to crops, pets or livestock where NRC is at fault and no negligence on behalf of owners has occurred.</p>	
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<p>Northland Regional Council Biosecurity team (late)</p>	<p>PLA/25</p>	<ul style="list-style-type: none"> - RPMS could be improved by including a clear sense of direction and strategy for actual work priorities, rather than just the species focus required by the Biosecurity Act. The funding information is provided by strategy not species, which may make it unclear where NRC priorities lie. - It is not always clear why NRC responds to some species and expects landowners to respond in others. - The wording for the rule regarding management plans for containment species is unclear and needs revision, e.g. for African feather grass. - Need maps showing containment areas where text of RPMS describes a containment zone for a species. It may be useful to include maps for some eradication species also 	<p>General PLA/25.1 Include maps and tables showing priority work programmes. PLA/25.2 Review explanations regarding NRC vs landowner response to pests. PLA/25.3 Review wording of management plan rules. PLA/25.4 Include maps of containment or eradication areas where useful.</p>	<p>Yes</p>
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