

I hereby give notice that a meeting of the Strategy and Policy Committee will be held on:

Date: Wednesday, 9 August 2017
Time: 10.30am
Venue: Tararua Room
Horizons Regional Council
11-15 Victoria Avenue, Palmerston North

STRATEGY AND POLICY COMMITTEE SUPPLEMENTARY AGENDA

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Report No.	17-146
Decision Required	

REGIONAL PEST MANAGEMENT PLAN 2017-2037

1. PURPOSE

- 1.1. This item is to update Council on progress with the Regional Pest Management Pest Plan (the Plan) and addresses steps five and six (in part) of the Plan making process as outlined in the Biosecurity Act 1993.

2. EXECUTIVE SUMMARY

- 2.1. On 7 June 2017 Council determined that the requirements of the Biosecurity Act 1993 (the Act) were met in respect of the proposal for the Regional Pest Management Pest Plan (the proposal), including that sufficient consultation had been undertaken and accounted for in preparation of the final proposal (Resolution 17-99).
- 2.2. Those resolutions were made following a process which involved the receiving and hearing of submissions on the proposal, the consideration and adoption of Council officer recommendations in respect of submissions, and the completion of further analysis (in light of submissions) regarding aspects of the proposal. Changes were made to the proposal as a consequence of further work undertaken by staff over the latter half of 2016, with an amended proposal presented to Council on 28 March 2017. Further consultation was carried out at the direction of Council with key stakeholders, culminating in Council receiving a final proposal, and accompanying officer reports, on 7 June 2017.
- 2.3. On that same day, 7 June 2017, Council approved the preparation of the Plan under section 73 of the Act. This item addresses the next steps of the plan making process.
- 2.4. A draft Plan has been prepared by Council officers. The plan reflects the proposal which was approved by Council on 7 June 20017 with the addition of some minor changes to address the change from a proposal to a Plan under the Act including (among other things) the removal of some information (not required in the Plan under the Act), as well as changes in tense, titles, dates and the like. Opportunity has also been taken through a further review to remove any inadvertent errors or inconsistencies throughout the Plan.
- 2.5. In incorporating some of the reference documents completed as part of the analysis required under the National Policy Direction (NPD), changes have also been made to some of the Plan provisions; primarily in terms of cross-referencing sections and documents but also in removal of some unnecessary duplication (for example, the actual or potential effects of implementation are now addressed through the costs and benefit supporting documentation). One change which is specifically noted by staff relates to recognition of alligator weed as an environmental pest as well as a production pest (at Table 5-4). This was an oversight by Council officers which was identified as part of recent discussions with Ruapehu District Council regarding its submission. The change does not alter any of the supporting analysis with respect to this pest and its management.
- 2.6. The draft plan is at **Annexure A**.
- 2.7. The Biosecurity Act requires a number of procedural steps to be taken sequentially in making a regional pest management plan. Council officers have previously traversed these with Council, but for completeness they are included at 7.2 below. The next steps involve:
 - (a) The Council being satisfied that the Plan contains the information required under section 73 and that it meets all the requirements of Section 74 of the Act;

- (b) On being satisfied that sections 73 and 74 have been complied with, to prepare a written report and to make and record its decisions under Section 75 of the Act.
- 2.8. Council Officers have analysed how the requirements of section 73 and 74 of the Biosecurity Act have been met by the draft Plan. The report Biosecurity Act 1993 Sections 73 and 74 Analyses (satisfaction of Plan requirements) is attached as **Annexure B**.
- 2.9. If Council agrees that sections 73 and 74 have been satisfied, the next steps would be for Council to prepare a written report on the Plan and to set out in the report the reasons for accepting or rejecting the submissions received in the proposal. Section 75(3) provides that the report must give the Council's decision on the Plan.
- 2.10. To inform Council's written report and final decision, staff have prepared a report which compiles all Council officer recommendations in respect of submissions through the plan making process to date, and as incorporated into the proposal as approved by Council in June 2017. This report also provides some guidance on the changes identified at 2.4 and 2.5 above. The report "Plan Submissions – Summary Report" is at **Annexure C**.
- 2.11. Council must make its final decision on the Plan for inclusion in the written report to be prepared under section 75. The final report will be released to submitters. Council will also give public notice of its decision under section 74(4) of the Act.
- 2.12. The Plan will then be at a stage where there is a 15 working day opportunity for submitters or other parties (where they have been involved in the consultation process) to apply to the Environment Court to make changes to the plan. If there are no applications to the Environment Court, the final step in the plan making process is to affix the Council seal under section 77 of the Biosecurity Act. If there are applications the Environment Court must hold a public hearing with the outcome either to dismiss the application or to direct the Council to modify the plan, or to delete or insert a provision from / in the plan.

3. RECOMMENDATION

That the Committee recommends that Council:

- a. Receives the information contained in Report No. 17-146 and Annexes;
- b. Resolves that the draft Plan specifies the matters listed in Section 73(3) of the Biosecurity Act 1993 and otherwise complies with section 73 of the Act;
- c. Resolves that Council is satisfied that the draft Plan meets the requirements of section 74 of the Act;
- d. Adopts the recommendations of Council Officers as set out in the Plan Submissions Summary Report (and incorporated into the Plan) as its decisions on submissions;
- e. Directs Council Officers to prepare a final written report under section 75 of the Act, incorporating Council's decisions on submissions for final consideration by Council;
- f. Directs Council officers to finalise the draft Plan for final approval by Council;
- g. Resolves that on review of the final written report and Plan it will give its decision on the plan under section 75(3), circulate the written report to submitters, and give public notice of its decision under section 75(4) of the Act.

4. FINANCIAL IMPACT

- 4.1. This item has no financial impact. When the Plan is finally adopted there will be some financial impacts as a result of the new plan.

5. COMMUNITY ENGAGEMENT

- 5.1. The plan making process has involved a range of consultation, including a publicly notified submissions process, regional roadshows and specific consultation with key stakeholders and interested groups. Further consultation has been undertaken over the course of 2017, as has been previously reported to Council. At its meeting on 7 June 2017 Council resolved that sufficient consultation had occurred and that all the issues raised in consultation on the proposal had been considered as required by section 73(1) of the Act.

6. SIGNIFICANT BUSINESS RISK IMPACT

- 6.1. There are potentially significant business risk impacts if there is an application to the Environment Court regarding Council decisions on the plan under section 76 of the Biosecurity Act. There would be costs directly attributable to having to participate in the appeal and further, associated delays in the implementation of the revised Plan.

7. BACKGROUND

Process

- 7.1. The Act sets out the process that must be undertaken to prepare a regional pest management plan. Those steps must be completed in a sequential manner.
- 7.2. By way of reminder, there are six steps in the plan making process
- Section 70 - First step: plan initiated by proposal which sets out (among other things) the pests to be managed, the objective of management, the costs and benefits of management, who is affected by the Plan, any rules, and who pays;
 - Section 71 - Second step: satisfaction on requirements that (among other things) the proposal is not inconsistent with the National Policy Direction 2015 (NPD), the proposal has merit, the pests are known to cause adverse effects, and the rules will assist in achieving the Plan's objectives;
 - Section 72 - Third step: satisfaction with consultation or requirement for more consultation where Council considers that it is satisfied that parties who will be affected by the Plan have been consulted;
 - Section 73 - Fourth step: approval of preparation of plan and decision on management agency where, having been satisfied of the steps above, Council approves the preparation of the (final) Plan and decides who will manage the Plan;
 - Section 74 - Fifth step: satisfaction on content of plan and requirements to check that the Plan still not inconsistent with the NPD and that the benefits outweigh the costs;
 - Section 75 - Sixth step: decision on plan where, having been satisfied with step 5, Council approves the public release of the Plan and sets out in a report the reasons for accepting or rejecting submissions;
- 7.3. Two further stages exist under the Act. There is a period of time (15 working days following public notice of Council's decision) in which an application may be made to the Environment Court about the plan, and then, in the absence of any application or on resolution or determination of the application, the making of the plan through affixing the seal of Council. Once the seal is affixed to the Plan, it becomes operational.
- 7.4. This item is seeking Council's approval in relation to the last phases of the decision making process under the Act. In the first instance Council must be satisfied that the draft Plan contains all matters specified under the Biosecurity Act (in section 73). It is only then that Council can consider the requirements of section 74 and (next) section 75 of the Act.

Content of Plan

- 7.5. Council officers have addressed whether the Council can be satisfied of the matters set out in section 73(3) to (6) of the Act in the report, *Biosecurity Act 1993 Sections 73 and 74 Analyses (satisfaction of Plan requirements)*. The report identifies how each of the matters are specified in the Plan. The report is attached as **Annexure B**.
- 7.6. If Council is satisfied that the draft Plan contains all the matters specified in section 73 of the Biosecurity Act, then this report recommends that this matter be resolved by Council.

Satisfaction on Requirements (Fifth step)

- 7.7. Similar to the process required under Section 71 of the Act (for the proposal) the Council must be satisfied, in respect of the draft Plan, of the following matters under section 74:

74 Fifth step: satisfaction on contents of plan and requirements

If the council is satisfied that section 73 has been complied with, the council may take the fifth step in the making of a plan, which is for the council to consider whether the council is satisfied, in relation to the plan prepared under section 73,—

- (a) *that the plan is not inconsistent with—*
 - (i) *the national policy direction; or*
 - (ii) *any other pest management plan on the same organism; or*
 - (iii) *any pathway management plan; or*
 - (iv) *a regional policy statement or regional plan prepared under the Resource Management Act 1991; or*
 - (v) *any regulations; and*
- (b) *that, for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other courses of action; and*
- (c) *that, for each subject of the plan, persons who are required, as a group, to meet directly any or all of the costs of implementing the plan—*
 - (i) *will accrue, as a group, benefits outweighing the costs; or*
 - (ii) *contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan; and*
- (d) *that, for each subject of the plan, there is likely to be adequate funding for the implementation of the plan for the shorter of its proposed duration and 5 years; and*
- (e) *that each rule—*
 - (i) *will assist in achieving the plan's objectives; and*
 - (ii) *will not trespass unduly on the rights of individuals.*

- 7.8. The report attached at Annexure C, *Biosecurity Act 1993 Sections 73 and 74 Analyses (satisfaction of Plan requirements)* again addresses whether the Council can be satisfied of these matters by reference to the Plan and plan making process, including when having regard to the requirements of the NPD and other legislation and regulatory documents.

- 7.9. If Council is satisfied that the requirements of Section 74 of the Biosecurity Act have been met, this report recommends that this be resolved at this meeting.

Written report

- 7.10. Under section 75 of the Act the Council is required to prepare a written report setting out reasons for accepting or rejecting the submissions received on the proposal. That report must also record Council's decision in respect of the plan.
- 7.11. To assist Council in its role under section 75, Council officers have prepared a report (Annexure C) which compiles all of the recommendations on each of the submissions to date by topic. Note that these recommendations have been traversed with Council at various stages of the plan making process, however, this report can be used by Council as the basis for its final written report under section 75. This is an internal report which provides an overview of response to / recommendations regarding submissions to date through the plan making process, and not the view of Council, unless adopted as such.

8. NEXT STEPS

- 8.1. Having reviewed and approved the proposal, considered the submissions lodged on it, as well as the draft Plan and reports provided by Council Officers over the course of the plan making process, Council must determine whether it is satisfied that the requirements of sections 70 to 74 (Steps 1 through 5) have been met. If so, Council will approve the Plan.
- 8.2. Next steps would then involve finalising the written report and releasing it to submitters, as well as publicly notifying its decision under section 75(4) of the Act.

9. CONSULTATION

- 9.1. Consultation on the Pest Plan is a requirement under Section 72 of the Biosecurity Act 1993. There has been a high level of engagement with public and stakeholders leading to a sufficient level of consultation. See also paragraph 5.1 above.

10. SIGNIFICANCE

- 10.1. This is a significant decision according to the Council's Policy on Significance and Engagement due to the high degree of importance that a regional Pest Management Plan has on the economic, environmental, social and cultural well-being of the Region. There are a number of persons and agencies affected by, and/or interested in the issues.

Rod Smillie
BIODIVERSITY, BIOSECURITY & PARTNERSHIPS MANAGER

Jon Roygard
GROUP MANAGER NATURAL RESOURCES & PARTNERSHIPS

ANNEXES

- A Regional Pest Management Plan
B Biosecurity Act 1993 Section 73 and 74 Analyses
C Plan Submissions Summary Report

Horizons Regional Council Regional Pest Management Plan 2017-2037

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Foreword

Pest management is a joint effort between the regional councils, their communities and a host of other agencies that have a role in managing the effects of pests on economic and environmental values. This *Regional Pest Management Plan 2017 to 2037* (the Plan) uses the provisions of the Biosecurity Act 1993 to support that effort.

The 2012 amendments to the Biosecurity Act include the introduction of the National Policy Direction (NPD). Embedded in the purpose of the NPD is greater consistency between regional council pest management plans and the introduction of the principle of “good neighbours”. The *Regional Pest Management Plan* meets these directives by adopting programme types that are consistent with the NPD and adopting the use of good neighbour rules only where they are appropriate for the management of the spread of pests across boundaries.

The Plan also continues with earlier objectives from Horizons previous pest plant and pest animal management strategies to exclude those pests that have yet to reach the Region and eradicate those where the infestations are localised enough to make eradication a plausible prospect. Where eradication is not feasible, but containment is possible, the Plan has objectives to progressively contain and reduce the extent of a suite of pests to reduce their effects. Finally, for possums and rabbits, which are widespread species, the Plan has objectives for sustained control to limit their effects.

Horizons Regional Council is committed to the efficient and effective management of the threats imposed by pest plants and animals on the Region’s economy and environment. This Plan supports that commitment by providing the regulatory backbone for regional pest management.

Michael McCartney
CHIEF EXECUTIVE

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Part One: Plan Establishment

1. Introduction

1.1. The management agency

In recognition of its regional leadership role under the Biosecurity Act 1993 (the Act), Horizons (the trading name of the Manawatu-Wanganui Regional Council) is the management agency for this Regional Pest Management Plan. Horizons' Regional Pest Management Plan 2017-2037 (the Plan) builds on and replaces the previous regulatory (Biosecurity Act) components of the Regional Pest Animal Management Strategy (2009) and the Regional Pest Plant Management Strategy (2007) in accordance with 2012 amendments to the Act, the introduction of the National Policy Direction for Pest Management 2015 (NPD), and the submissions received by Horizons.

1.2. Purpose

The purpose of the Plan is to outline the regulatory framework for efficient and effective management or eradication of specified animal and plant organisms in the Manawatu-Wanganui Region so as to:

- Prevent, reduce, or eliminate the adverse effects of those organisms and their management; and
- Maximise the effectiveness of individual pest management action by way of a regionally coordinated approach.

There are many organisms in the Manawatu-Wanganui Region that are considered undesirable or a nuisance. However, it is only where a subject is capable of causing an adverse effect in the region, where a planned approach would be more effective than voluntary management, and where the benefits of a regional plan outweigh the costs of that plan that regional management is warranted. The Act contains prerequisite criteria that must be met to justify such intervention. This Plan signals which organisms should be classified as pests and managed on a regional basis based on those criteria.

The Plan empowers Horizons to exercise the relevant advisory, service delivery, regulatory and funding provisions available under the Act in delivering the specific objectives identified in Part Two of this Plan.

1.3. Coverage

The Plan takes effect within the administrative boundaries of the Region (*Map 1-1*) as defined by the Local Government (Manawatu-Wanganui Region) Reorganisation Order 1989, *Gazette* p2351. The Manawatu-Wanganui Region covers a land area of approximately 22,215 square kilometres in the lower Central North Island, and extends 12 miles (19.3 km) out to sea.

1.4. Duration

This Plan has a duration period of 20 years and takes effect on the date that it is made operative in accordance with Section 77 of the Act and as indicated by the date that the common seal of the Manawatu-Wanganui Regional Council is affixed to this Plan. The termination date shall be December 2037. A review of each section of the Plan will begin within 10 years of this Plan being affixed with the common seal of the Manawatu-Wanganui Regional Council (i.e. 2027). Otherwise, Horizons has the ability to initiate a review in particular circumstances (*see Section 6.3*).

1.5. Terms and definitions

A description of terms used in the Plan can be found in the Glossary at the end of this document.

1.6. Document Structure

The Act has specific requirements for the Regional Pest Plan.

Part One: Plan Establishment

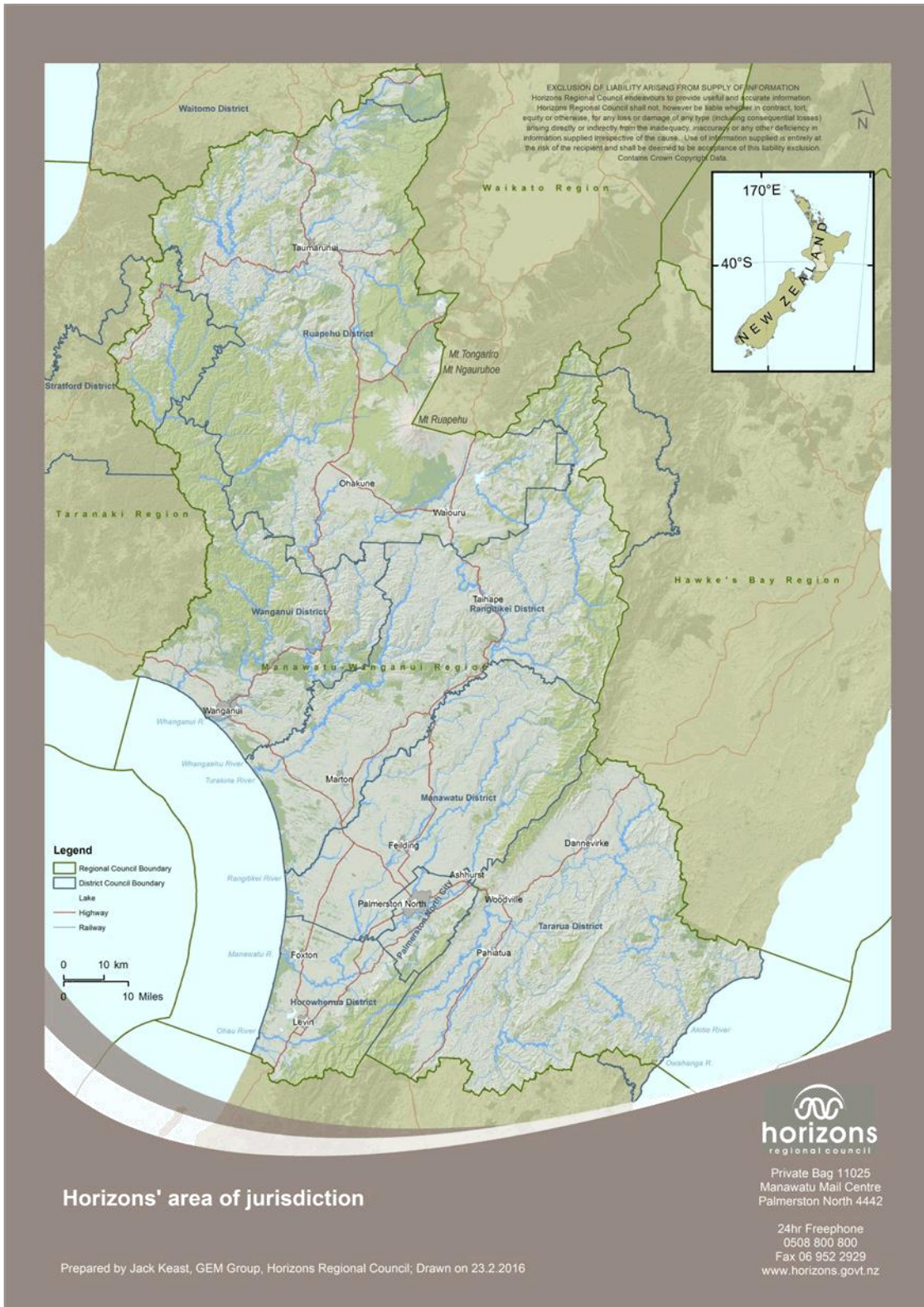
Part One contains introductory information that will assist the reader's understanding of the Plan. It sets out the statutory requirements of identifying the management agency, the Plan's purpose, coverage or jurisdictional area of the Plan, and the Plan's duration. Part One lists the specific pests to be managed under the Plan and the specific programme description (as described in the NPD) that they will be managed under. Finally, this Part includes relevant statutory background, and the general responsibilities and obligations of those affected by the Plan.

Part Two: Pest Management

Part Two sets out the management regime for the pests that feature in the Plan. It sets out the reason for a pest's inclusion, the principal measures for management, and applicable rules. Part Two also includes how the Plan will be monitored and reviewed.

Part Three: Procedures

Part Three describes the administrative and management procedures as prescribed by the Act. This part lists the powers conferred under the Act, enforcement matters, the exemption process and describes generically how the Plan will be funded. This Part draws on documents incorporated by reference including the analysis of costs and benefits, the analysis of exacerbators and beneficiaries, and general funding considerations.



Map 1-1: Regional Administrative Boundaries and Horizons' area of jurisdiction.

2. Organism Status

Section 2 identifies which organisms are classified as pests under the Plan and which are assigned as ‘any other organism to be controlled’. It also indicates the programme or programmes that will be utilised to meet the desired pest management objectives as described throughout *Section 5.4* of this Plan.

2.1. Organisms classified as pests

The animals and plants listed in *Table 2-1* and *Table 2-2* are classified as pests under this Plan, and assigned to a New Zealand-wide control designation embraced by regional councils. *Section 5.1* of this Plan sets out the detail of each of the programmes, but in summary they are:

1. Exclusion programme (preventing establishment);
2. Eradication programme;
3. Progressive containment programme (rolling back); and
4. Sustained control programme.

These designations follow the directions on setting objectives laid out in the NPD (Section 4) as the intermediate outcomes that the Plan seeks to achieve. The NPD also identifies “Protecting Values in Places” as an intermediate outcome. Horizons has opted to use non-regulatory approaches to protecting specific values in specific places and so these do not feature in this Plan. Horizons’ pest management aspirations for site-led approaches specifically for protecting biodiversity are described in Chapter 6 of Horizons’ Regional Plan and Policy Statement (the One Plan).

Pests prohibited from sale and distribution

In accordance with Section 52 of the Act, the pests listed in *Table 2-1* and *Table 2-2* must not be knowingly communicated (or caused to be communicated), released (or caused to be released) or spread unless in accordance with this Plan or as otherwise permitted under Section 52 of the Act. Under Section 53 of the Act, any person in charge of these organisms should not offer for sale, or propagate, breed, or multiply the organisms unless permitted by a chief technical officer.

Other organisms banned from propagation and release to the wild

The Plan is one of a number of legislative components that restrict the distribution, sale, liberation or propagation of pests.

For example, mammals such as feral pigs, feral goats, all deer (including red and fallow), moose, chamois, and that are classified as “wild animals” under the Wild Animal Control Act 1977, and their liberation to the wild is prohibited under Section 11 of that Act. Department of Conservation (DOC) has the statutory authority to act on illegal liberations of such wild animals not otherwise covered in this Plan. Horizons will work with DOC to collectively address the issue of illegal liberations.

The liberation of any introduced aquatic life (including exotic fish) to water bodies, where the species is otherwise absent, is prohibited by the Conservation Act 1987. DOC and the Fish and Game Council (in relation to sports fish) have the statutory authority to act on illegal liberations of fish not otherwise covered in this Plan. Horizons will work with these agencies to collectively address the issue of illegal liberations of fish. The liberation of birds is also regulated by these two agencies.

The sale, distribution, and propagation of any Unwanted Organism or “UWO” (as recognised and registered by a Chief Technical Officer) is controlled under the Biosecurity Act 1993. The UWO register maintained by the Ministry for Primary Industries (MPI) contains a long list of plants and animals including insects and other invertebrates, as well as diseases - not all of which appear in this Plan. While not requiring direct involvement

from Horizons, any discovery of plants and animals in Horizons Region that are Unwanted Organisms but not listed in this Plan will be reported to the lead agency.

The UWOs that appear in this Plan are indicated with “UWO” and the lead central government agency (either MPI or DOC) in *Table 2-1* and *Table 2-2* of this Plan. In the case of the management of these pests Horizons will take a pivotal role and work with the central government agency to regulate the distribution of these pests.

Newly imported organisms are regulated under the Hazardous Substances and New Organisms Act 1996 by the Environmental Protection Authority.

Members of the public and industry must check with Horizons, DOC, the Fish and Game Council, MPI, and the Environmental Protection Authority before releasing any plants and animals to the wild.

2.1.1. Pest animals

Table 2-1: Animal organisms classified as pests, their control programmes under this Plan and the agency responsible for management

Species	Exclusion	Eradication	Progressive Containment	Sustained Control
Wallaby species (pg. 2929) <i>Macropus species</i>	✓ Horizons/MPI (UWO MPI)			
Possum (pg. 58) <i>Trichosurus vulpecula</i>				✓ Horizons
Rabbit (feral) (pg. 58) <i>Oryctolagus cuniculus</i>				✓ Horizons/Occupier
Rook (pg. 31) <i>Corvus frugilegus</i>		✓ Horizons (UWO MPI)		

The animals are listed alphabetically by common name. The page numbers quoted refer to the page on which the description of the species can be found. While Horizons will take the lead on exclusion of wallaby, the eradication of rooks, the sustained control of possums (limited to rateable land under the auspices of a Horizons-led Possum Control Operation), and the release of calicivirus for rabbits, Horizons’ activity does not absolve the occupier of their legal obligations to report and assist Horizons in the control of these pests, or undertake control as required by rules.

2.1.2. Pest plants

Table 2-2: Plant organisms classified as pests, their control programmes under this Plan, and the agency responsible for management.

Species	Exclusion	Eradication	Progressive Containment	Sustained Control
African feather grass (pg.31) <i>Cenchrus macrourus</i>		✓ Horizons		
Alligator weed (pg. 31) <i>Alternanthera philoxeroides</i>		✓ Horizons (UWO MPI)		
Arrowhead (pg. 31) <i>Sagittaria montevidensis</i>		✓ Horizons (UWO DOC)		
Australian sedge (pg. 37) <i>Carex longibrachiata</i>			✓ Occupier	
Banana passionfruit (pg. 37) <i>Passiflora tripartita</i> (all varieties), <i>P. tarminiana</i> , <i>P. mixta</i> , <i>P. pinnatistipula</i> , <i>P. x rosea</i>			✓ Horizons	
Blackberry (pg. 37) <i>Rubus fruticosus</i> agg.			✓ Occupier	
Blue passion flower (pg. 31) <i>Passiflora caerulea</i>		✓ Horizons		
Humped Bladderwort (pg. 29) <i>Utricularia gibba</i>	✓ Horizons (UWO DOC)			
Boneseed (pg. 37) <i>Chrysanthemoides monilifera</i>			✓ Horizons (UWO MPI)	
Broom species (exotic) (pg. 37)			✓	

Species	Exclusion	Eradication	Progressive Containment	Sustained Control
<i>Cytisus scoparius</i> , <i>Calicotome spinosa</i> <i>Genista monspessulana</i> , <i>Spartium junceum</i>			Occupier	
Californian bulrush (pg. 29) <i>Schoenoplectus californicus</i>	✓ Horizons			
Cathedral bells (pg. 31) <i>Cobaea scandens</i>		✓ Horizons		
Chilean needle grass (pg. 29) <i>Nassella neesiana</i>	✓ Horizons			
Giant and Chilean rhubarb (pg. 31) <i>Gunnera tinctoria</i> , <i>G. manicata</i> and all varieties		✓ Horizons (UWO DOC)		
Chinese pennisetum (pg. 32) <i>Cenchrus purpurascens</i>		✓ Occupier / Horizons		
Climbing alstromeria (pg. 32) <i>Bomarea caldasii</i>		✓ Horizons		
Climbing spindleberry (pg. 32) <i>Celastrus orbiculatus</i>		✓ Horizons (UWO DOC)		
Contorta pine (pg. 37) <i>Pinus contorta</i>			✓ Horizons / Occupier	
Darwin's barberry (pg. 38) <i>Berberis darwinii</i>			✓ Horizons / Occupier (UWO DOC)	
Dwarf mountain pine (pg. 38) <i>Pinus mugo</i>			✓ Horizons/Occupier	
Eelgrass (pg. 38) <i>Vallisneria australis</i>			✓ Horizons	
Egeria (pg. 38) <i>Egeria densa</i>			✓ Horizons (UWO DOC)	
Evergreen buckthorn (pg. 38) <i>Rhamnus alaternus</i>			✓ Horizons / Occupier (UWO DOC)	
Field horsetail (pg. 38) <i>Equisetum arvense</i>			✓ Horizons/Occupier (UWO MPI)	
Gorse (pg. 38) <i>Ulex europaeus</i>			✓ Occupier	
Grey willow (pg. 39) <i>Salix cinerea</i>			✓ Horizons / Occupier (UWO DOC)	
Heath rush (pg. 29) <i>Juncus squarrosus</i>	✓ Horizons			
Himalayan balsam (pg. 32) <i>Impatiens glandulifera</i>		✓ Horizons		
Hornwort (pg. 39) <i>Ceratophyllum demersum</i>			✓ Horizons (UWO DOC)	
Knotweed (Asiatic and giant) (pg. 32) <i>Fallopia japonica</i> and <i>Reynoutria sachalinensis</i>		✓ Horizons (UWO MPI)		
Lagarosiphon (pg. 39) <i>Lagarosiphon major</i>			✓ Horizons (UWO DOC)	
Manchurian wild rice (pg. 29) <i>Zizania latifolia</i>	✓ Horizons (UWO DOC)			
Moth plant (pg. 39) <i>Araujia sericifera</i>			✓ Horizons / Occupier (UWO DOC)	
Mountain pine (pg. 39) <i>Pinus uncinata</i>			✓ Horizons/Occupier	
Nodding thistle (pg. 39) <i>Carduus nutans</i>			✓ Occupier	

Species	Exclusion	Eradication	Progressive Containment	Sustained Control
Nassella tussock and Mexican feather grass (pg. 32) <i>Nassella trichotoma</i> and <i>N. tenuissima</i>		✓ Horizons (UWO MPI)		
Noogoora bur (pg. 29) <i>Xanthium strumarium</i>	✓ Horizons			
Old man's beard (pg. 39) <i>Clematis vitalba</i>			✓ Horizons / Occupier (UWO DOC)	
Phragmites australis (pg. 29) <i>Phragmites australis</i>	✓ Horizons (UWO DOC)			
Purple loosestrife (pg. 32) <i>Lythrum salicaria</i>		✓ Horizons (UWO DOC)		
Queensland poplar (pg. 32) <i>Homalanthus populifolius</i>		✓ Horizons (UWO MPI)		
Reed sweetgrass (pg. 40) <i>Glyceria maxima</i>			✓ Horizons	
Rum cherry (pg. 32) <i>Prunus serotina</i>		✓ Horizons (UWO MPI)		
Saffron thistle (pg. 29) <i>Carthamus lanatus</i>	✓ Horizons			
Sagittaria (pg. 29) <i>Sagittaria platyphylla</i>	✓ Horizons			
Scots pine (pg. 40) <i>Pinus sylvestris</i>			✓ Horizons / Occupier	
Senegal tea (pg. 32) <i>Gymnocoronis spilanthoides</i>		✓ Horizons		
Spartina (pg. 33) <i>Spartina</i> (all species and hybrids)		✓ Horizons/DOC		
Sweet Pittosporum (pg. 29) <i>Pittosporum undulatum</i>	✓ Horizons (UWO MPI)			
Tussock hawkweed (pg. 29) <i>Hieracium lepidulum</i>	✓ Horizons (UWO MPI)			
Tutsan (pg. 40) <i>Hypericum androsaemum</i>			✓ Occupier (UWO MPI)	
Variigated thistle (pg. 40) <i>Silybum marianum</i>			✓ Occupier	
Woolly nightshade (pg. 33) <i>Solanum mauritianum</i>		✓ Occupier / Horizons (UWO MPI)		
Yellow bristlegrass (pg. 40) <i>Setaria pumila</i>			✓ Occupier	
Yellow ragwort (pg. 40) <i>Jacobaea vulgaris</i>			✓ Occupier	

The plants are listed alphabetically by common name. The page numbers quoted refer to the page on which the description of the species can be found. While Horizons will take the lead on exclusion and eradication pest plants, and the lead on some of the progressive containment pest plants (limited to their control within the containment zones), Horizons' activity does not absolve the occupier of their legal obligations to report and assist Horizons in the control of these pests, or undertake control as required by rules.

3. Planning and Statutory Background

3.1. Strategic background

Pest management influences, and is influenced by, the way land and water is used and managed. Horizons has several planning or operational mandates that have regional pest management implications. Occupiers and the wider community, either as beneficiaries or exacerbators or both, are a fundamental part of the framework. The inherent nature of regional pest management planning processes under the Act provides the most efficient mechanism to reduce or prevent pest impacts on a region's economic, environmental, social and cultural values. The Plan is therefore central to the implementation of all pest management activity. This comprehensive linkage is reflected in the Council's biosecurity mission to "safeguard Horizons' regional economy and environment from the damage caused by harmful organisms".

One of the key drivers for Horizons' pest management future includes building and enhancing relationships and a collaborative approach to managing pests. *Figure 3-1* depicts the key strategic relationships that influence or are influenced by Horizons' regional pest management Plan.



Figure 3-1: Strategic relationships of regional pest management

Long-term Plan (LTP) and Annual Plan

The LTP and annual planning processes define the resources that Horizons anticipates will be needed to accomplish the objectives set out in the Plan. These processes provide Horizons' community with the ability to regulate the speed and cost of implementing the Plan. These processes also identify the rate of implementation of other activities that have aspects of pest management within them, such as the Sustainable Land Use Initiative (SLUI), the Whanganui Catchment Strategy (WCS) and works under Horizons' flood control and drainage schemes.

The One Plan

The One Plan is Horizons' principal document dealing with matters for which Horizons is responsible under the Resource Management Act 1991 (RMA). In keeping with the RMA's general principles, the One Plan's policies, methods and regulations seek to protect the Region's economy, natural heritage and landscape. The Plan provides a crucial tool in achieving the goals outlined in the One Plan by providing the regulatory framework for integrating the control of pests that affect the success of One Plan objectives for soil conservation, biodiversity and flood protection.

National Biosecurity Strategy

The New Zealand Biosecurity Strategy came into effect in 2003 and sets the scene for the expectations for nationally integrated pest management under the NPD (discussed in *Section 3.5*). The general expectations are:

- That there is clear and effective national leadership and coordination of pest management activities within central government, local government and the private sector;
- That there are transparent and effective performance measures to monitor and forecast the establishment of pest impacts and pathways;
- That the Crown meets its obligation as a landowner; and
- That there is a routine programme of national and regional communication and coordination, including ongoing assessment and review.

MPI is the lead agency in biosecurity at the national level.

National Biodiversity Strategy

The New Zealand Biodiversity Strategy was launched in 2000 and is coordinated by DOC. This strategy outlines the actions undertaken to implement New Zealand's requirements under the Convention on Biological Diversity, which was ratified by the New Zealand Government in 1993. The term 'biodiversity' relates to the variety of biological life and the natural patterns it forms, and includes genetic diversity, the diversity of species and habitat diversity. The New Zealand Biodiversity Strategy identifies that the maintenance of biodiversity in New Zealand is under great threat from invasive species. Effective biosecurity is a key need for the protection of biodiversity.

Neighbouring Councils

Horizons shares boundaries with Greater Wellington, Taranaki, Waikato and Hawke's Bay regional councils. Pest management is typically about effective and creative pathway management to prevent pest spread. It is in the interests of efficient and effective pest management to ensure that the pest management objectives between neighbouring councils are not inconsistent with each other. In developing this Plan, Horizons has remained cognisant of, and has given regard to the aims and objectives of existing pest management plans or strategies of neighbouring councils. In working with other regional councils, Horizons continues to pursue better pathway management approaches especially the inter-regional movement of risk goods, vehicle movements, and stock, in conjunction with other active partners from central government and industry. Horizons, Hawkes Bay, and Greater Wellington regional councils work collaboratively on the management of rooks for instance.

Māori

The relationships between Māori, their culture and traditions and their ancestral lands, waters, sites, wāhi tapu, and taonga are among the specific values to protect from the effects of pests under the Biosecurity Act, as well as an important consideration under the Local Government Act 2002, RMA, and Treaty settlement legislation. The Plan is one of the avenues to build synergy and co-operation between Māori organisations and Horizons as partners in managing the Region's natural resources.

Occupiers and the Wider Community

The task of strategic pest management is much greater than can be dealt with by Horizons alone. The Plan is very much about Horizons' ability and capacity to manage the effects of pests on the Region's economy and environment, using regulation as guided by national legislation and policy direction. In the wider context of strategic pest management, successful pest control relies on occupiers and the community to work jointly with Horizons to achieve the aims and aspirations outlined in the Plan.

Non-Regulatory Biosecurity Programmes

Over the duration of forming this Plan, Horizons proposed a Regional Biosecurity Strategy to detail the non-regulatory and aspirational aspects of pest management that cannot otherwise be incorporated into a Plan, such as Horizons' site-led pest management approach, thinking on pathway management plans, the use of social marketing, and the programmed investigation of potential pests. Further work on such a document is a project in development. Meanwhile, those who are interested in Horizons' annual objectives for non-regulatory biosecurity activity (including site-led programmes) can turn to Horizons Annual Operational Plans (one each for Pest Plant, Pest Animals, and Biodiversity) for information.

3.2. Legislative background

Regional councils undertake local government activities and actions under several legislative mandates. While embracing pest management is not solely dependent on a particular statute, its effectiveness is correlated to the purpose of the particular statute. All regional councils in New Zealand have favoured the Biosecurity Act 1993 for preparing and operating regional pest management plans. The successful implementation of the rules specified in this Plan is wholly dependent on Horizons' powers under the Biosecurity Act. *Figure 3-2* depicts the main legislative instruments Horizons must account for when implementing the Plan.

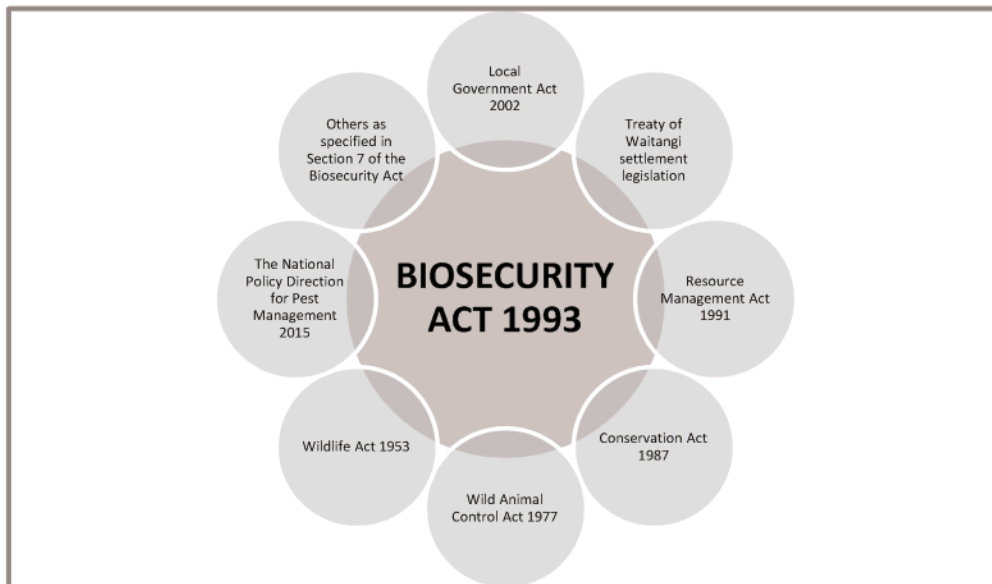


Figure 3-2: Biosecurity-relevant legislation

In preparing this Plan, Horizons has taken into account the Act and subsequent legislative amendments to it, including the NPD. This Plan has been considered, planned and funded pursuant to Part 5 of the Act (particularly Sections 70 to 76 of the Act). While the Act is the cornerstone of the Plan, nothing in the Plan is to affect or derogate from other legislation or national directions relating to pest management. To Horizons knowledge, this Plan is consistent with the requirements in Section 7 of the Act, and the pest management activities contained herein are in accordance with relevant New Zealand legislation.

3.3. Relationship with other Pest Management Plans and Pathway Management Plans

A regional pest management plan must not be inconsistent with any national or regional pest management plan (whether relating to the same region or any other region or regions) concerning the same organism, or inconsistent with a pathway management plan.

Horizons has had regard to the aims and objectives of existing pest management plans and strategies of neighbouring regional councils, and continues to work collaboratively with neighbouring regions to ensure that policies for managing pests near regional boundaries are as mutual as possible. Horizons is also cognisant of, and has given regard to the control of Unwanted Organisms that are in the Plan and also under the auspices of central government agencies. Horizons will continue to work with DOC and MPI to ensure that the implementation of Horizons' Plan is not inconsistent with their objectives for Unwanted Organisms or new national pest management plans as they arise.

At the present date (August 2017), there are no pathway management plans affecting the Region, or affected by this Plan.

3.4. Relationship with Māori

One specific purpose of a regional pest management plan under the Act is to provide for the protection of the relationship between Māori and their ancestral lands, waters, sites, wāhi tapu, and taonga, and to protect those aspects from the adverse effects of pests. Māori involvement in biosecurity is an important part of exercising kaitiakitanga. Māori also carry out significant pest management through their primary sector economic interests and as land owners and/or occupiers.

The Local Government Act also requires councils 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. While these responsibilities and requirements are much greater than can be addressed through pest plan decision-making alone, Horizons specifically included iwi authorities in the public engagement process while forming the Plan.

As Treaty settlements progress between central government and Treaty claimant entities, Horizons' pest planning may need to further evolve to give further and more specific recognition to the effect of pests on Māori values. Until then, Horizons has ensured that there is nothing in this Plan that prevents functional engagement with Māori stakeholders at either the strategic or operational level of Plan implementation.

3.5. Relationship with the National Policy Direction

The NPD was prepared by the Minister for Primary Industries in accordance with Section 56 of the Act, and came into effect on 24 September 2015. The purpose of the NPD is to ensure that activities under Part 5 of the Act (Pest Management) provide the best use of available resources for New Zealand's best interests and align with one another, when necessary, to contribute to the achievement of the purpose of Part 5.

The following steps in *Table 3-1* have been undertaken to comply with the NPD.

Table 3-1: Steps to ensure compliance with National Policy Direction

NPD requirements	Steps taken to comply
Programme descriptions	The types of programmes as described in Part 2 (Pest Management) of the Plan are in accordance with Section 5 of the NPD.
Setting objectives	The contents of <i>Section 5.2</i> of the Plan are described in accordance with Section 4 of the NPD.
Analysing benefits and costs	Analyses of benefits and costs (ABC) have been undertaken in accordance with Section 6 of the NPD. An evaluation of the level of ABC required, titled " <i>Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: National Policy Direction - Section 6(1) analysis</i> ", accompanies this Plan. An evaluation of the benefits and costs, titled " <i>Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: Analysis of benefits and costs following the National Policy Direction for Pest Management Section 6(2-4)</i> " accompanies this Plan.
Funding rationale	The funding rationale has been developed in accordance with Section 7 of the NPD. The analysis titled " <i>Horizons' Amended Proposed Regional Pest Plan 2017-2037: Allocation of costs following the National Policy Direction for Pest Management (Section 7)</i> " accompanies this Plan.
Good neighbour rules	The good neighbour rules have been developed so as to achieve consistency with Section 8 of the NPD. The analysis titled " <i>Horizons' Amended Proposed Regional Pest Plan 2017-2037: Analysis of Good Neighbour Rules following the National Policy Direction for Pest Management (Section 8)</i> " accompanies this Plan.

4. Responsibilities and obligations

4.1. Responsibilities of the management agency

As the management agency responsible for implementing this Plan, Horizons will:

- Within 3 months of the Plan becoming operative, prepare an Operational Plan for its implementation;
- Review the Operational Plan annually, and, if it thinks fit, amend it;
- Prepare a report on the Operational Plan and its implementation not later than five months after the end of each financial year; and
- Make copies of the Operational Plan and reports on its implementation available to the public.

The principal measures by which Horizons will implement this Plan are identified in relation to individual pest animals and pest plants described throughout *Section 5.3* of this Plan. The detailed manner in which Horizons will undertake its management responsibilities is set out in Part 3 (Procedures) of this Plan.

4.2. Compensation and disposal of receipts

The Plan does not provide for compensation to be paid to any persons as a result of losses incurred as a direct result of any obligations under the Plan or its implementation. Should there be any net proceeds arising in the course of implementing the Plan, distribution shall be in accordance with Section 100I of the Act.

4.3. Responsibilities of owners and/or occupiers

Pest management is an individual's responsibility in the first instance. This is primarily because occupiers generally contribute to the pest problem and in turn benefit from the control of pests. The term Occupier has a wide definition under the Act and includes:

- The person who physically occupies the place; and
- The owner of the place; and
- Any agent, employee, or other person acting or apparently acting in the general management or control of the place.

Under the Act, place includes: any building, conveyance, craft, land or structure and the bed and waters of the sea and any canal, lake, pond, river or stream.

Under Part Two of the Plan, occupiers/landowners are responsible for managing pest populations in accordance with the rules in this Plan. Failure to meet rule requirements can lead to regulatory action being taken against an occupier/owner. However, in specific situations, Horizons will carry out or facilitate pest control where it is:

- In the interests of the wider community to do so;
- More cost effective for Horizons to do so;
- On a user pays basis or in an agreed rating district; or
- Part of regulatory default action.

Occupiers have a duty to report the presence of pests to Horizons and to refrain from the sale, propagation, distribution or harbouring of pests.

An occupier cannot prevent the entry of a duly authorised person onto private land, at any reasonable time, for the purpose of establishing the presence or absence of pests, and/or for managing pests in accordance with this Plan or compliance with biosecurity law. While the methods of control are the prerogative of the occupier, compliance with the requirements under other legislation (for example, the RMA or the Hazardous Substances and New Organisms Act 1996) must also occur.

This Plan treats all private land equitably and emphasises the responsibilities and obligations of all land owners and/or occupiers, including Māori. Council acknowledges the complex and variable relationships of Māori land ownership and occupation. This includes multiple owners (including lessees) or a range of corporate management systems under the [Companies Act 1993](#) or [Te Ture Māori Whenua Act 1993](#). Where owners and/or occupiers are unknown, the Maori Land Court; or the Registrar of Companies may help to identify and communicate with them.

4.4. Crown agencies and State Owned Enterprises

Horizon's identifies five central government agencies (including State Owned Enterprises (or SOEs)) occupying the Crown estate in the Manawatu-Wanganui Region. Pursuant to Section 5 and Section 69 (5) of the Act, the Act binds Crown agencies to the extent that they will be liable to meet obligations or costs associated with a good neighbour rule, or action under a plan to enforce a good neighbour rule in the Plan. In addition to implementing good neighbour rules, Horizons will also continue to pursue and maintain formal and informal relationships with Crown agencies to achieve the objectives of this Plan. As they are not Crown agencies in the strict sense, SOEs can be bound by any rule under the Plan.

In some circumstances it may be appropriate for Horizons and a Crown agency/SOE to negotiate an agreement of specific actions and timeframes to bring about compliance with the Plan, or otherwise achieve the outcomes of the Plan (through alternatives to meeting the rule framework). One method of recording any agreement is in the form of a Memorandum of Understanding (MoU). MoU's are discussed in further detail in Section 5.3.5. A MoU may set out a range of matters, including (where applicable) any exemption granted in accordance with the exemption process detailed in *Section 7.1.5* of the Plan.

4.4.1. Department of Conservation

DOC administers 423,777 ha (approximately 19% of the total land area) in the Manawatu-Wanganui Region. DOC is an occupier (though not always the sole occupier) or public conservation land under the Reserves Act 1977, National Parks Act 1980 and the Conservation Act 1987, and may also hold land under the Wildlife Act 1953 and Wild Animal Control Act 1977. There are three DOC operational regions with part of their areas within the Horizons boundaries. DOC has particular interest and expertise in the area of pest threats to indigenous biodiversity values.

4.4.2. Land Information New Zealand

Land Information New Zealand (LINZ) administers approximately 1,280 ha of vacant and non-rateable land. LINZ also has responsibility for unalienated Crown land in the Region and surplus railway land.

4.4.3. KiwiRail

KiwiRail is a State Owned Enterprise and is responsible for managing a rail corridor of approximately 522 km, as well as land and rail infrastructure, on behalf of the Crown, in the Manawatu-Wanganui Region. This accounts for approximately 1,600 ha of non-surplus railway land. For this Plan, KiwiRail is synonymous with "rail authority".

4.4.4. New Zealand Defence Force

The New Zealand Defence Force (NZDF) has three main installations within the Region (Ohakea Air Force Base, Linton Army Camp and Waiouru Army Camp and its surrounding training area) as well as smaller property located throughout the region. The total area occupied is approximately 62,000 ha.

4.4.5. New Zealand Transport Agency

The NZ Transport Agency is the roading authority for State Highways. NZ Transport Agency manages approximately 1,216 km of road and roadside verges and as such is subject to the conditions relating to the management of pests on road verges identified in *Section 4.6* of this Plan.

4.5. Territorial Local Authorities

Section 73 (3) (k) of the Act requires that Horizons specifies the actions that local authorities may take to implement the Plan. There are 10 Territorial Local Authorities (TLAs) wholly or partly contained within the Manawatu-Wanganui Region (see *Map 1-1: Regional Administrative Boundaries and Horizons' area of jurisdiction.*). They are: Horowhenua District, Palmerston North City, Tararua District, Manawatu District, Rangitikei District, Wanganui District, Ruapehu District, Stratford District, Taupo District and Waitomo District.

Each territorial authority will be bound by the rules in this Plan, with the exception of situations where adjoining occupiers of road reserves are deemed responsible in accordance with *Section 4.6*. Each territorial authority will be responsible for meeting its costs of complying with this Plan. The only TLA not affected is Taupo District, which does not administer land or roads in the Manawatu-Wanganui Region.

MOU's setting out roles and responsibilities for pest management between Horizons and the TLAs will be established or renewed. Such agreements will, among other things:

- Identify an annual operational plan to which the TLA agrees to be bound;
- State which species are to be controlled, and where, and best practice control methods suggested;
- State expected timeframes for completion of work;
- Incorporate existing agreements such as non-toxin agreements between TLAs and their clients (ratepayers); and
- Encourage machine hygiene and the prevention of pest spread.

Where applicable, MOU's may also set out any exemption granted by Horizons in accordance with the process set out in *Section 7.1.5* of the Plan.

4.6. Occupiers of road reserves

Section 6(1) of the Act states that:

Where a pest management plan or a pathway management plan applies to land adjoining a road, the plan may state that the land includes, for the purposes of the plan, all or any of the portions of road bounded by –

- (a) The boundary of that land abutting that road; and
- (b) Lines extended from the end of that portion of boundary to the middle line of the road; and
- (c) The middle line of the road connecting those extended lines.

The management of infestation on road or adjacent reserves is a critical part of managing the spread of pests from property to property along road corridors. The roading authorities and adjacent occupiers are each responsible for managing their respective side of the boundary. Generally, the boundary will be taken as the

fenced boundary between a public road and the land adjoining the road. Where the road reserve boundary is unknown it shall be taken as 10m from the road centre line, unless this includes another occupier's land, which in this case, the distance (that will be less than 10m) will be adjusted accordingly.

In situations where it may be unreasonable to expect pest control to be undertaken (e.g. steep topography, unstable surfaces, or safety concerns), an occupier of road reserve has the option of seeking an exemption in accordance with the process set out in *Section 7.1.5* of this Plan.

Roading Authorities

Except where a rule prevents occupier control of pests, roading authorities are responsible for controlling pests (as described in Part Two of this Plan) on road reserves that they occupy in the following situations:

- Rest areas;
- Weigh pits and stockpile areas;
- Road reserves where road works have contributed to the establishment of named pests;
- Other isolated areas of road reserves for safety reasons; and
- Road reserves adjacent to land where the landowner is undertaking programmed pest management.

Occupiers

Except where a rule prevents occupier control of pests, adjacent landowners are responsible for controlling pests (as described in Part Two of this Plan) on road reserves in the following situations:

- Unformed (paper) roads that they occupy, or are contiguous to the land they occupy;
- On the adjacent landowners side of the fence on land beyond 10 m of the road centre line where the road reserve boundary is unknown;
- Where fences encroach into a surveyed road reserve, the occupier adjoining the road reserve must be responsible for pests within that fenced area;
- Where adjacent occupiers do not support the use of toxins to control pests (e.g. organic farming practices), the occupier must engage with the appropriate roading authority to identify alternative measures.

These provisions do not apply to private roads such as internal farm tracks, windfarm roads, or the roads within the NZDFS' Waiouru Military Training Area. In these cases, rules apply as stated within Part Two of the Plan.

4.7. Good neighbour rules

Certain pests in this Plan have a good neighbour rule. The good neighbour rules included in this Plan have been assessed as complying with the 'Directions on Good Neighbour Rules' as set out in Section 8 of the NPD in the document titled "*Horizons' Amended Proposed Regional Pest Plan 2017-2037: Analysis of Good Neighbour Rules following the National Policy Direction for Pest Management (Section 8)*". In summary, good neighbour rules can be used and enforced where:

- Without the rule, due to the characteristics of the pest it would spread to nearby land causing unreasonable costs to the occupier of that land (the Affected Occupier);
- The Affected Occupier is taking reasonable measures to manage the pest or its impacts; and

- The requirements to comply with the rule are reasonable relative to the costs that the Affected Occupier would incur from the pest spreading.

A good neighbour rule focuses on managing the costs incurred by the Affected Occupier due to the spread of pests from the property of the other neighbour. Horizons considers such rules to be useful to ensure that a person who is going to the trouble of managing certain pests on the land that they occupy is not incurring unreasonable ongoing costs resulting from a neighbour not doing the same.

The good neighbour rules in this Plan apply to land within a specified distance of the boundary of the Affected Occupiers' land. The specified distance is based on the characteristics of the pest that the rule applies to. In the case of pest plants this distance takes into account the maximum unaided dispersal distance of seed from that plant (these distances are set out in *Table 5-10*). In the case of possums and rabbits, it is the distance that Horizons can reasonably estimate abundance on both sides of the boundary to determine if there is a likelihood of spread from the neighbour.

Horizons is of the view that the specified distances for control are reasonable relative to the costs that may be incurred from spread of the pest. This has been supported through the benefit and costs and clause 8 analysis undertaken by Horizons – see the document is titled "*Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: Analysis of benefits and costs following the National Policy Direction for Pest Management Section 6(2-4)*" and "*Horizons Amended Proposed Regional Pest Management Plan 2017-2037: Analysis of Good Neighbour Rules following the National Policy Direction for Pest Management (Section 8)*".

4.7.1. Reasonable measures explained

Another important component (or trigger) of the good neighbour rules is whether an Affected Occupier is taking 'reasonable measures' to control the pest. Reasonable measures (and unreasonable costs) are not defined in the Act, but it is helpful to provide some scope to assessing these two things.

Reasonable measures are actions that result in the effective management of the pest where the cost of control is less than the benefits derived from future management of the land. An exacerbating neighbour creates unreasonable cost when the Affected Occupier is undertaking reasonable measures but is experiencing costs due to ongoing control being required because the pest is spreading from the neighbour's land.

Occupiers participating in a Horizons-led pest control programme (such as obliging Horizons-led progressive containment pest plants programme or being part of the PCO programme on the land that they occupy) is accepted by Horizons to be a reasonable measure for the purpose of any good neighbour rule.

When assessing whether reasonable measures are in place, Horizons' Authorised Persons will otherwise look for evidence of pest management. Consideration will be given to the following:

- Physical Factors where inspection reveals immediate evidence of:
 - Target pest destruction such as dead plants;
 - Cleared areas from cutting and/or cutting and treating;
 - Paddocks with the majority of land cover being pasture that may contain treated plants, or small amounts of seedlings/regrowth to be treated;
 - The presence or evidence of use of toxic bait, or traps, or other devices in sufficient quantity and state, such that they would result in the management of the pest.
- Records (evidence may include but is not limited to):
 - Evidence of recent contracted work such as invoices for sprays, baits, or ammunition, or contract labour;
 - Tallies of animals killed, animal tails, receipts of payment for animal skins (with tally) or fur (with weight);
 - Before and after photographs of the site;

- A current and forecasted property/paddock spray plan or pasture management/development plan that identifies long term control of pest;
- Results of a monitoring operation done in accordance with a recognised (published or certified) monitoring protocol.
- A history of opting into a Horizons-led pest management programme.

Horizons' Authorised Persons may consider other evidence that would demonstrate that the Affected Occupier is undertaking reasonable measures to control the pest on their land. The affected occupier must demonstrate that they are doing more than what is required by a good neighbour rule in this Plan.

4.8. Clear land rule

The intent of the Clear Land rule is to focus pest control efforts on keeping clear land clear and therefore stopping further spread of these pest plants within the Region. A clear land rule acknowledges that, while it is not practicable to eradicate 'progressive containment' pest plants in all circumstances, small infestations can and should be eradicated. These rules apply when the infestation of the pest on 'clear land' is within an infestation threshold size for the particular pest species. The 'threshold infestation sizes' are set out in *Table 5-10* as a m² or hectare area. If the infestation is within the threshold it is considered that the benefits of clearing the pest outweigh the costs of doing so.

A difference between a good neighbour rule and a clear land rule is that a good neighbour rule is enforced only to manage the spread of a pest between properties, whereas a clear land rule is enforced to reduce the incidence of the pest locally where it is economically prudent to do so. The rules in tandem have the effect of preventing expansion of the pest in areas that are presently clear or being cleared of the pest within the Manawatu-Wanganui region.

4.9. Approved Management plans

An approved management plan is a documented pest management plan that describes the levels of service for management of pests where they must be managed to reduce spread. They are written by the agency required to have such a plan as stated in a rule, usually as an alternative to achieving the specifications contained in that rule on the level of pest clearance or timing of the delivery of the service. The intent of an Approved Management Plan is to meet the objective by reducing the spread of that pest from the place(s) that they occupy. Horizons' Principal Officer or their delegate must be satisfied that the proposal will meet that objective.

Part Two: Pest Management

5. Programmes and Attributes

In preparing management objectives and identifying the principle measures for implementing pest management programmes, Horizons undertakes an analysis to determine the most sensible, equitable, practical and affordable management solution for each pest or class of pest under an appropriate designation.

5.1. Pest management programmes

The pests, and any other organisms to be controlled, will be managed under one of the following pest management programmes. The definition of these programmes are consistent with national definitions of “intermediate outcomes” contained in the NPD and are based on an assessment of invasion extent and the ability to achieve desired control levels for the particular pests. The programmes are described as follows:

5.1.1. Preventing establishment: Exclusion programme

The intermediate outcome is to search for subject pests and prevent the establishment of the pest which is present in New Zealand but not yet established the Region, and which has the potential to become a serious pest in the future. Section 100V of the Act may be used to instigate emergency control of new incursions of pests that are not otherwise listed in this Plan.

5.1.2. Eradicating: Eradication programme

The intermediate outcome is to eradicate the pest in an area. In the short to medium term, eradication involves reducing infestation levels of the subject to zero levels. This category includes potentially invasive pests where their rate of increase or geographic extent is not well known, but is assumed to be at low densities or low geographic spread.

5.1.3. Rolling back: Progressive containment programme

The intermediate outcome is to contain and reduce the geographic distribution of the pest to an area over time. Containment usually arises in situations where the subject is at high densities in part of the Region, but of low extent or limited range. Eradication is not feasible, but it is feasible to prevent the pest from spreading to other parts of the Region or to eradicate the pest from other parts of the Region.

5.1.4. Managing Externalities: Sustained Control programme

The intermediate outcome is to provide for the ongoing control of the pest so as to reduce its impact and its spread to other properties. The focus is on the densities of a subject and ensuring they do not reach a level where they are causing significant externality impacts. Sustained control is a strategy for pests of low to moderate densities but of such wide geographical spread that they cannot be easily eradicated.

5.1.5. Protecting value in places: site-led pest programme

The intermediate outcome is to exclude, or eradicate, from that place; or to contain, reduce or control within that place; the pests that are capable of causing damage to a place (site) and its values.

With reference to the programme type “Protecting Values in Places”, Horizons is opting to take a non-regulatory approach to managing pests in significant places and so the programme type “Protecting Values in Places” does not feature in the Plan at this time.

5.2. Objectives

The NPD prescribes the following matters to be encompassed within an objective for each organism or classes of organisms:

- The particular adverse effect/s of the subject on the matters listed ins54(a) of the Act;
- Pest management intermediate outcome/s to be achieved;
- The geographic area to which the objective applies;
- The extent to which the outcome will be achieved (if applicable);
- The period within which the outcome is expected to be achieved; and
- If the period for achieving the outcome is more than 10 years, what is intended to be achieved in the first 10 years of the Plan, or during the current term of the Plan prior to the next review (if applicable).

To this end, the Objectives Section for each pest specifies the duration and outcomes for each pest, and the particular adverse effect being addressed by the Plan (See Pest Management Attributes – *Section 5.4*).

5.3. Principal measures

The Act requires a Regional Pest Management Plan to indicate the principal measures (actions) that will be used in the Plan to achieve the objectives (s70(2)(c)(iv)). The following principal measures are grouped under four main categories. The activities that may occur within each category are provided as a suite of possibilities that may be applied as appropriate.

5.3.1. Requirement to act

Occupiers or other persons will be required to act where Plan rules dictate:

- (a) Pests are to be controlled or destroyed;
- (b) Management plans are to be prepared and submitted;
- (c) The presence of pests is to be reported;
- (d) Any actions that are to be reported (type, quantity, frequency, location, programme completion);
and
- (e) Pests are not to be spread (propagation, sale, distribution), pathways are to be managed (machinery, gravel, animals).

Occupiers or other persons will also be required to act as necessary to comply with the Biosecurity Act 1993.

5.3.2. Council inspection

This measure may include Horizons staff as Authorised Persons undertaking:

- (a) Property visits or surveys to determine the presence or absence of pests, compliance with rules and management programmes, or to identify areas for which control programmes will apply (places of value, exclusion zones, movement control areas);

- (b) Regulatory management (rule enforcement, action on default, prosecution, exemptions);
- (c) Limited control action where it is effective and cost efficient to do so; and
- (d) Effectiveness monitoring where it is more effective and cost efficient than to do so independently.

5.3.3. Service delivery (including biocontrol)

Horizons may undertake service delivery as follows:

- (a) Where it is funded to do so within a rating area;
- (b) On a user-pays basis;
- (c) Providing control tools, including sourcing and distributing biological agents or provisions.

5.3.4. Advocacy and education

Horizons may undertake:

- (a) The provision of any of a broad suite of general purpose education, advice, awareness and publicity activities concerning pests, pathways and their control to occupiers and the general public;
- (b) Encouragement of occupiers to carry out pest control;
- (c) Facilitating or funding community and occupier self-help groups and committees;
- (d) Assisting other agencies with control, advocacy and the sharing or sourcing of funding;
- (e) The promotion of industry requirements and best practice to contractors and occupiers;
- (f) Encouragement of occupiers and other persons to report the presence of pests or to control them; and
- (g) Facilitating or commissioning research.

5.3.5. Memoranda of Understanding (MOU)

Horizons may develop MOUs with an Occupier to achieve the following:

- (a) Establish agreed levels of services from those Occupiers to act to control pests on their land;
- (b) Consider alternative methods of pest control to comply with the rule framework, including good neighbour rules in this Plan, and in doing so deliver pragmatic levels of service that achieve the objectives of the Plan.

Where applicable, MoU may also record the outcome of any exemption process under *Section 7.1.5* of the Plan. These aspects of an MoU will be legally binding, and enforceable in accordance with the Act.

Matters which may be provided for in an MoU with respect to any exemption include (without limitation):

- A description of the exemption including the rule or rules that the occupier is exempt from meeting;

- The reasons for exemption;
- An annual operational plan or alternative action to which the occupier agrees to be bound;
- The species to be controlled, and where, and best practice control methods;
- Expected timeframes for completion of work and the period of any exemption;
- Any existing agreements between roading authorities and Crown agencies and their neighbours (ratepayers) that are relevant to the management of the pests in this Plan, e.g. non-toxin agreements; and
- Reference to other published standards, codes of practice, or other guidelines that lead to a mutual and publically transparent agreement on levels of service such as (for instance) best practice guidelines for machine hygiene that aid in the prevention of pest spread.

MOUs shall be publically available.

5.3.6. Pests in this Plan are prohibited from sale and distribution

As stated in *Section 2.1* above, the pests listed in this Plan are prohibited from sale, breeding, propagation and distribution in accordance with Section 52 and Section 53 of the Act, except where otherwise specified.

Section 52 Obligation:

No person shall knowingly communicate, cause to be communicated, release, or cause to be released, or otherwise spread any pest or unwanted organism except:

- (a) In the course of and in accordance with the Plan; or
- (a) As provided in an emergency regulation made under Section 150 of the Act; or
- (b) For a scientific purpose carried out with the authority of the Minister; or
- (c) As permitted either generally or specifically by a chief technical officer.

Section 53 Obligation:

The owner or person in charge of an organism which that person knows or suspects constitutes a pest to be managed in this Plan must not:

- (a) Cause or permit that organism to be in a place where organisms are offered for sale or are exhibited; or
- (b) Sell or offer that organism for sale; or
- (c) Propagate, breed, or multiply the pest or unwanted organism or otherwise act in such a manner as is likely to encourage or cause the propagation, breeding, or multiplication of the pest or unwanted organism.

The exemption to the Section 53 obligation is where the Chief Technical Officer permits an owner or person in charge of an organism to carry out an Act. The reason for declaring that these pests are banned from sale and distribution under this Plan is to prevent their further spread through negligent liberations or ignorance, and to remind the regional community of their general obligations under the Act.

Breach of any of the provisions of these Section of the Act is an offence under the Biosecurity Act. The penalties for a breach of Sections 52 and 53 for an individual person is a fine of up to \$100,000 or up to five years in jail, or both. For a corporation the fine is up to \$200,000.

5.4. Pest management attributes

The following sections describe the pest management attributes for each pest or group of pests to be managed under this Plan. This section also describes any rules that will be used to achieve the objectives of the Plan.

For each pest or group of pests listed the Act requires a Regional Pest Management Plan to describe the reasons for inclusion (and why it is more appropriate than relying on voluntary action), the objectives of pest management (see *Section 5.2* above) and the principal measures used to achieve the objectives (see *Section 5.3* above).

Section 71 (d) of the Act requires that Horizons be satisfied that the pests are capable of causing at some time an adverse effect on at least one of a number of values listed in *italic* below. To inform the evaluation of the Plan in this regard, Horizons has grouped the values into three broad categories:

- Production pests – those that affect the value of *economic wellbeing*, or affect *animal welfare*;
- Environmental pests – those that affect the *viability of threatened species of organisms, the survival and distribution of indigenous plants or animals, or affect the sustainability of natural and developed ecosystems, ecological processes and biological diversity, or affect soil resources and water quality*; and
- Social / amenity pests – those pests that affect *human health, social and cultural wellbeing, or affect the enjoyment of the recreational value of the natural environment*.

The Act also includes the *relationship between Māori, their culture, and their traditions and their ancestral lands, waters, sites, wāhi tapu and taonga* as a value that Horizons may consider affected by pests. This set of values sit across all three of the broad categories that Horizons has used to evaluate pests in the region.

These effects are reported for each pest or group of pests under “Effect” in *Table 5-1, Table 5-4, Table 5-9* and *Table 5-19* respectively.

5.5. Exclusion Programme

Horizons' Exclusion Programme covers species for which Horizons has opted to be the lead agency or partner for managing new incursions into the Region. These pests are present in New Zealand, but outside the Manawatu-Wanganui Region. They have the potential to expand their range into the Manawatu-Wanganui Region and become a problem. At the time of writing this Plan, these pests are not yet known to have established self-sustaining populations in the Region, or they have recently been eradicated.

Horizons' management of new incursions is not limited to these pests. If other organisms appear (as new incursions) in the Region, Horizons can opt to undertake small-scale eradication programmes of those species under Section 100V of the Act, without the need to reference those organisms in the Plan.

Table 5-1: Organisms on Horizons' Exclusion Programme.

Species	Description	Effect
Humped bladderwort (pg. 29)	A sprawling submerged aquatic plant with finely divided thread-like leaves, with tiny round bladders (often black) which trap small aquatic invertebrates. Small yellow flowers (from summer to autumn). Forms dense mats and is capable of invading wetlands and ponds, potentially displacing native <i>Utricularia</i> species.	Environmental Pest, absent from Region
Californian bulrush (pg. 29)	A tall dense clump-forming rush found on coastal river banks and estuaries. A small site of this environmental weed (near Taumarunui) has been eradicated.	Environmental Pest, Eradicated
Chilean needle grass (pg.30)	An erect, tussocky perennial grass. Primarily a production pest plant affecting pastoral farming, but capable of invading indigenous ecosystems also.	Production Pest, absent from Region
Heath rush (pg. 30)	A leafy rush, this environmental pest plant is capable of invading indigenous ecosystems.	Environmental Pest, absent from Region
Manchurian wild rice (pg. 30)	A large-growing grass that grows on the margins of wetlands and waterways. This environmental pest plant is classified nationally as unwanted organism. Regulated also by the Ministry for Primary Industries.	Environmental Pest, absent from Region
Noogoora bur (pg. 30)	An herbaceous weed with 'bur' fruits. This production pest plant affects economic well-being (mainly the value of wool).	Production pest, absent from Region
Phragmites australis (pg. 30)	A large reed forming dense beds on the edges of water. This is an environmental pest plant and is classified nationally as an unwanted organism. Regulated also by the Department of Conservation.	Environmental Pest, absent from Region
Saffron thistle (pg. 30)	An herbaceous weed, this production pest plant affects pastoral productivity.	Production Pest, absent from Region
Sagittaria platyphylla (pg. 30)	An invasive aquatic herb, this environmental pest plant is capable of invading indigenous aquatic ecosystems.	Environmental Pest, absent from Region
Sweet Pittosporum (pg. 30)	A shrubby tree, this environmental pest plant is capable of invading indigenous scrub ecosystems.	Environmental Pest, absent from Region
Tussock hawkweed (pg. 30)	An herbaceous weed found in grassland, roadsides, and river beds. This environmental pest plant is capable of invading indigenous ecosystems.	Environmental Pest, absent from Region
Wallaby species (pg. 30)	Specifically dama and Bennett's wallaby, which are a small to mid-sized macropod mammal. The macropods are distinguished from other marsupial mammals by their propensity to hop on their hind legs, using their muscular tail for balance. Wallabies are production pest animals that mainly affect pastoral and horticultural values. They also affect native ecosystems through selective browse of understory plants. Classified nationally as an unwanted organism. Regulated also by Ministry for Primary Industries.	Production and Environmental pest, absent from Region

The page numbers quoted refer to the page on which the management regime for each species can be found.

Reason for Inclusion

The pests on the Exclusion Programme, classed as production or environmental pests, are capable of causing adverse effects to the productive capacity of the Region, or to the Region's environmental values, as indicated by the Description and Effect of each of the pests in *Table 5-1* above. They are grouped because the management regime is the same. The geographic area that the Plan applies to under this Programme is the whole Region.

For the pest plants listed in the Exclusion Programme, the Plan is more appropriate than relying on voluntary action because under voluntary action there is likely to be a delay between the arrival of the pest and taking action before the obvious effects of these pests are felt.

For wallaby, the Plan is more appropriate than relying on voluntary action because under voluntary action there is likely to be a delay between the arrival of wallaby and tacking action before the obvious effects of this pest is

felt. Also, one of the potential vectors of the spread of this pest is intentional liberation. Having the Plan provides Horizons with the tools (rules) to minimise and manage intentional liberation.

Management Regime

Table 5-2: Management regime for Exclusion Programme pests

Management regime for Exclusion Programme pests	
<p>OBJECTIVES</p> <p>For the duration of the Plan (2017 – 2037), exclude the pests listed in <i>Table 5-1</i> from the entire Region to prevent their establishment and prevent their adverse effects on economic well-being and the environment.</p> <p>AIMS</p> <ul style="list-style-type: none"> • Detect these pests before they become widely established in the Region. • Facilitate a quick response through appropriate funding that will enable the control or management of these species on rateable land. • In the first 10 year period of the Plan to 2027, eradicate the pests listed in <i>Table 5-1</i> if they are introduced into the Region. 	<p>PRINCIPAL MEASURES</p> <p>Service delivery Subject to feasibility, Horizons will undertake control of these pests in the Region if they are detected.</p> <p>Council inspection Horizons may conduct surveillance programmes for these pests.</p> <p>Advocacy and education Horizons may carry out programmes to increase awareness of the exclusion programme and the threat posed by these pests.</p> <p>These pests will be incorporated into generic biosecurity advocacy programmes, including information on preventing their dispersal.</p> <p>Requirement to act Occupiers must inform Horizons of the presence of these pests on their land. Occupiers will act in accordance with the Act and with the rules for exclusion pests detailed in <i>Table 5-3</i>. This will aid in the detection of the pests if they arrive in the Region and prevent purposeful importation of the pests without Horizons knowledge.</p>
<p>MONITORING</p> <p>The pests listed in <i>Table 5-1</i> will be monitored in accordance with <i>Section 6.1</i> of this Plan.</p>	<p>OUTCOMES</p> <p>Economic losses to the primary production sector by these pests are avoided.</p> <p>Native ecosystems are protected from the significant adverse effects of these pests and their management.</p>

Specific Rules

Table 5-3: Specific rules for Exclusion Pests

Specific rules for Exclusion Pests	
Rule	Explanation
Duty to Inform Rule 5.3.1	All occupiers who become aware of the pests listed in <i>Table 5-1</i> in the place they occupy must inform Horizons of the presence of those pests within five working days of the discovery of the pest.
Wallaby Rule 5.3.2	No person shall possess a live dama or Bennett's wallaby, or any other pest in <i>Table 5-1</i> in the Region without prior written permission from Horizons.
A breach of these rules will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with these rules is liable to penalties as prescribed under Section 157(5) of the Act.	

5.6. Eradication Programme

Horizons' eradication programme covers species for which Horizons has opted to be the lead agency or partner for eradicating the pests from the Region. These pests are present in the Manawatu-Wanganui Region but are limited in their size or extent of infestation, or their eradication is feasible and a cost-effective solution to protecting production or environmental values into the future. Many of these organisms are environmental or production pest plants. The rook (listed first) is the only pest animal included.

Table 5-4: Organisms on Horizons' Eradication Programme

Species	Description	Effect
Rook (pg. 34)	<p>A social bird from the crow family. Adult is glossy black, approximately 50 cm in length and weighs 350-500 gm. Rooks feed in flocks and can cause significant damage to crops such as newly sown cereals, ripening peas, broad beans, potatoes, pumpkins, walnuts, and fruit. On pastoral land they eat insects such as grass grubs, but any benefits are greatly outweighed by direct damage to pasture, and indirect effects such as opening up pasture to weed infestation and triggering soil erosion. Through effective past control rooks are largely restricted to the Tararua District, although there remain small rookeries in the Manawatu and Taihape areas and rooks are still seen near Ohakune. There is a large area of suitable habitat (farmland with cropping) west of the main ranges that could support many more birds.</p> <p>Due to their ability to disperse over long distances, there is a persistent threat of invasion into currently clear areas from residual populations in the Region, and a potential threat of re-invasion from neighbouring regions. Current evidence suggests that rooks will increase in numbers to economically damaging levels if uncontrolled.</p>	Production Pest
African feather grass (pg. 35)	A robust rhizomatous perennial grass that forms dense tussock up to 2m tall. A distinctive yellow/purple flower (from November to April) on a narrow cylindrical stem up to 300 m long. Known sites in Wanganui, the Rangitikei, Horowhenua and along the Manawatu River in the Tararua District. Unpalatable to stock and can outcompete pasture. Possibly some environmental effects as it prefers damp situations in swampy areas and along borders of streams, though will grow in a range of soil types including sand.	Production Pest
Alligator weed (pg. 35)	An aquatic perennial herb with floating stems that form dense floating mats. Waxy oval / egg shaped leaves in opposite pairs. Flowers (from December to February) are white in small papery florets in clover-like heads up to 13 mm in diameter. Known only at one site near Taumarunui. Grows quickly and can infest swamps, ponds, lagoons, stream banks, dune hollows and drains. Has also the potential to cause economic losses to lowland pasture and cropping land.	Environmental and Production Pest
Arrowhead (pg. 35)	A robust, stem-less, rhizomatous aquatic plant. Young plants have ribbon-like leaves and grow submerged. Older plants emerge above the water with glabrous leaves that are shaped like an arrowhead up to 28 cm long and 23 cm wide. Currently known at two sites in the Region (near Whanganui city and Levin township). An invasive weed with the potential to block waterways and invade wetlands.	Environmental Pest
Blue passion flower (pg. 35)	A hairless vine with angular shoots with five-lobed leaves. Purple-white flowers (from December to April). Low infestations in the Region, and only known from Wanganui City, Dannevirke and the vicinity of Levin. The number of residential gardens in which blue passion flower is being cultivated is currently unknown. Capable of causing damage to native bush areas by smothering shrubs and canopy trees. It can grow in coastal shrublands, lowland forests, forest margins and wasteland areas.	Environmental Pest
Cathedral bells (pg. 35)	A fast-growing perennial climber with leaflets in three pairs. Leaves dark green above, whitish underside, with a brown stalk ending in a twining tendril. Flowers (summer to autumn) are bell-shaped, green initially and colouring to purple after pollen production. Large winged seed. Currently known from 25 sites with less than 10 hectares affected in total. The growth habit is to carpet the understorey of forests and smother canopy trees. This climber has the potential to become a major environmental pest problem in native forests, scrub and recreation areas.	Environmental Pest
Giant and Chilean rhubarb (pg. 35)	Both species are giant clump-forming summer-green herb growing up to 2 m tall. Rhubarb-like leaves approximately 80 cm by 100 cm, with soft prickles on main veins. Small greenish flowers (from October to November) on tall (1 m long) panicle rising from the base of the leaf stalks. Small (1.5 mm to 2 mm long) fruits are highly visible. Present in parks, botanic gardens and large private gardens, and in the wild along streams and drains. Current estimated area is 400 hectares. Chilean rhubarb has the potential to invade any steep wet cliff areas at the expense of indigenous habitat, and ability to invade pastoral drains. Considered a serious pest in Taranaki. While giant rhubarb has recently been reported as less invasive, the seedlings are difficult to tell apart.	Environmental Pest

Species	Description	Effect
Chinese pennisetum (pg. 35)	A tufted perennial grass that forms large tussocks around 1m high. Leaves are long and wiry. Flowers are purplish, bristly, cylindrical spikes. Now extends to around 1000ha. Generally unpalatable to stock. Does not compete successfully with dense pasture, but has the capability of affecting hill country pastures. Difficult to control once established. Small plants are difficult to distinguish from other grasses and rushes.	Production Pest
Climbing alstromeria (pg. 35)	A rhizomatous perennial vine with multiple twining stems. Pale green leaves are thin, elongated and pointed at the tips. Flowers are trumpet-shaped in dense drooping clusters. Flowers (mainly in spring or summer) are orange-red on the outside and yellow with red spots on the inside. Fruit is a capsule that splits to reveal bright orange/red fleshy seeds. Known from 8 sites in the Region. This shade tolerant vine has the capability of invading and smothering native forest and shrublands, particularly on margins such as tracks and fence lines.	Environmental Pest
Climbing spindleberry (pg. 35)	A deciduous hairless climber that can grow at least 12 m tall. Leaves are arranged alternately on the stem and are round to elliptical in shape. Flowers (from October to December) are green and inconspicuous. Fruit are showy and yellow, opening to expose a scarlet centre. Currently infesting approximately 110 ha. Aggressively invasive and shade tolerant, this weed is capable of invading and smothering native forest canopies and preventing forest regeneration by forming dense mats on the forest floor.	Environmental Pest
Himalayan balsam (pg. 35)	An herbaceous summer annual that can grow up to 3 m tall. Succulent reddish-green stem which is hollow and can range from 5 mm to 50 mm in diameter. Flowers are white to dark pink and resemble a British policeman's helmet. Balsam is frost-sensitive and dies back in winter. Found naturalised at 5 sites within the Region. Has the capability to compete with native plants for light, space, nutrient, and pollinators (bees) and can rapidly spread along gullies, riparian and forest margins, and into wetlands. On river banks, it can form dense monoculture stands that die back in winter, leaving bank prone to erosion.	Environmental Pest
Knotweed (pg. 35)	Upright perennial herb that can grow up to 3 m tall. Leaves are variable, oblong to spade-shaped and 50-140 mm long by 30-130 mm wide. Flowers are very small, white-greenish in colour and produced on long spikes in summer. Winged fruits. Presently known to be in isolated low-density populations. Tolerates a range of conditions including shade, high temperature, high salinity, drought and floods. Can form dense thickets and once established, populations can be extremely persistent. Has the potential to be a severe problem in riparian margins and low-lying areas and is known to be a serious pest in Australia, US and UK.	Environmental Pest
Nassella tussock and Mexican feather grass (pg. 35)	Vigorous perennial grasses with numerous drooping fine and wiry leaves. The two species are similar to each other. Plants grow up to 1 m tall and have a dense fibrous root system. Flowers (from October to December) are open-branched panicles, purple in colour. Seeds are wind dispersed and can travel up to 16 km from the parent plant. Known from 1 site, near Kakariki, that covers approximately 2 ha. Has the capability to invade and replace desirable pasture species, reducing stock carrying capacity by up to 10%.	Production Pest
Purple loosestrife (pg. 35)	A slow growing, hairy, perennial herb that grows up to 2 m tall. Dense purple flowered spikes at the top of each branch that produce thousands of long-lived seeds. Dies back to root crowns over winter. Currently present in low numbers across the Region, with a total area of infestation of about 100 ha. Highly invasive of wetland areas, stream and lake margins, and drains. Has the potential to displace all other wetland plants in lowland wetlands, drastically altering native ecosystems. One of the worst wetland plants in the US.	Environmental Pest
Queensland poplar (pg. 35)	An evergreen shrub with grey bark. Smooth, hairless leaves are green on the upper side and silver to blue-green underneath. Distinctly heart-shaped leaf turns deep-red in autumn. Flowers (from September to November) are small and inconspicuous. Smooth, round, drooping fruit look like small green buttons. Known in Wanganui at 3 sites. Can seed prolifically and is shade tolerant. Capable of forming a sub-canopy under native forests, effectively displacing native vegetation through competition for light, water, nutrients and space.	Environmental Pest
Rum cherry (pg. 35)	A large deciduous tree growing up to 18 m tall with a canopy 8 m wide and a trunk diameter of 70 cm to 120 cm. Leaves are 60 mm to 140 mm long. Small flowers (10 mm-15 mm in diameter) have 5 white petals and are fragrant. Leaves turn bronze in autumn and flowers appear in profusion before new leaves emerge in spring. The fruit ripens to dark red / black. Known from one site in (Ohakune). Little is known of the ecological impact of this species in New Zealand, but it is known to be highly invasive in Europe and dense stands of seedlings have been reported as being present in open forest sites in New Zealand. Suspected to be capable of invading native forest margins. While mainly considered an environmental pest, leaves have been reported to have caused livestock poisoning.	Environmental Pest
Senegal tea (pg. 35)	A perennial aquatic herb that grows to more than 1 m tall. It has hollow stems (1 m to 1.5 m long and 5 mm to 10 mm in diameter at first, increasing to 20 mm with age) which become prostrate and take root at nodes. It also has dark-green, slightly waxy, lance-shaped leaves (50 mm to 200 mm long by 25 mm to 50 mm wide) with serrated edges. Flowers (from November to April) are highly scented and clover-like. Known from 15 sites in the Region, located in Wanganui.	Environmental Pest

Species	Description	Effect
	Palmerston North and near Levin. Grows very quickly and is known to rapidly cover water bodies with a floating mat, excluding other plants and the animals that rely on those habitats. The effects of flooding are made much worse because infestations block drainage channels. Recreational activities, irrigation and navigation may also be affected.	
Spartina (pg. 35)	An herbaceous perennial plant growing 0.4 m to 1.3 m tall, yellowish green in spring and summer, and turning light brown in autumn and winter. The leaves are 200 mm to 600 mm long and 150 mm broad at the base, tapering to a point. It produces flowers and seeds on only one side of the stalk. The flowers are a yellowish-green, turning brown by the winter. Currently known to occur on public land at 3 river mouth sites. Spartina is managed by DOC but has the potential to invade wetlands outside of public estate if not managed. New colonies may take some time to become established, but once they do, vegetative spread by rhizomes is rapid, smothering natural ecosystems and preventing birds like waders from feeding.	Environmental Pest
Woolly nightshade (pg. 35)	A shrub or small tree capable of growing as tall as 5 m. Leaves are large (100 mm to 25 mm long by 35 mm to 100 mm wide), and are light to dark green on the upper surface, white to yellowish green on the lower surface. Flowers occur in dense clusters (from January to December), usually mauve to purple in colour, or white. Occasionally produces a spherical berry (c. 10 mm in diameter), dull yellow in colour. Primarily bird-dispersed. Present in dense populations around Wanganui but currently sparse elsewhere in the Region. An estimated 100 ha of production land is infested with woolly nightshade with a further 630 ha of commercial forestry, marginal land and urban areas with scattered infestations. An aggressive and rapidly growing plant that can establish quickly in poorly managed land, hill country and forest margins. The species is very competitive and readily invades over the top of gorse.	Production Pest

The page numbers quoted refer to the page on which the management regime for each species can be found.

Reason for Inclusion

The pests on the Eradication Programme, classed as production or environmental pests, are capable of causing adverse effects to the productive capacity of the Region, or to the Region’s environmental values, as indicated in the Description and by the Effect of each of the pests in *Table 5-4*. It is appropriate that Horizons be involved in managing these pests through the Plan, because the successful eradication of these pests requires coordination of action at a regional scale, and the benefits of the control of many of these pests accrue to a wider community than those directly affected by the presence of the pests on their property. Occupiers must inform Horizons of the presence of these pests and allow Horizons to undertake management, otherwise the eradication objective for these pests is compromised. The following explains why it is more appropriate to include the pests listed in *Table 5-4* in the Eradication Programme of the Plan than to rely on voluntary action.

5.6.1. Rook

The Plan is more appropriate than relying on voluntary action because the most effective methods for rook control are not available to the public and due to the tendency of rooks to become wary of control (e.g. shooting leads to rookery fragmentation and dispersal making control more difficult). Regional coordination of control is more cost effective than individual intervention. The geographic area that the Plan under this Programme applies to is the whole Region.

Management Regime

Table 5-5: Management regime for rooks

Management regime for rooks	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037), eradicate breeding rookeries and progressively contain or reduce rooks, across the Region to reduce adverse effects on economic well-being.</p> <p>AIMS</p> <ul style="list-style-type: none"> Progressive reduction of known active rookeries on rateable land within the Region to fewer than 50 active rookeries within the first ten year period to 2027. Reduce to zero levels breeding rookeries in the Region by 2037. Reduce to zero levels rooks hatched from rookeries located in the Region by 2037. 	<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons will coordinate and conduct control operations on all rookeries, and on rook flocks where conditions are suitable.</p> <p>Council inspection</p> <p>Horizons may undertake active surveillance operations to determine the location of rookeries in the Region. Horizons may also undertake site specific investigations to determine damage.</p> <p>Advocacy and education</p> <p>Horizons will carry out programmes to increase awareness and promote community participation in the surveillance for rooks and rookery locations.</p> <p>Requirement to act</p> <p>Occupiers must inform Horizons of the presence of rookeries. Occupiers will act in accordance with the Act and with the rules for rooks as detailed in Table 5-6. These rules will prevent the fragmentation of existing rookeries through poor practice and to aid in the detection of new rookeries if established over the life of the Plan.</p>
<p>MONITORING</p> <p>Horizons will monitor the success of rook control using standard industry protocol and best practice guidelines (NPCA 2006a1), which include operational success monitoring (percent kill estimates) and population census (number of active rookeries and active nests).</p> <p>Rooks will also be monitored in accordance with Section 6.1 of this Plan.</p>	<p>OUTCOMES</p> <p>Major damage to crop and pasture production by rooks is avoided.</p> <p>The number of breeding rookeries are reduced to zero levels.</p>

Specific Rules

Table 5-6: Specific rules for rooks

Specific rules for rooks	
Rule	Explanation
Rookery Management Rule 5.6.1	No person shall attempt to control rooks or rookeries without prior permission from an Authorised Person ¹ .
Duty to Inform Rule 5.6.2	All occupiers who become aware of rookeries in the place which they occupy must inform Horizons of the presence of those rookeries within five working days of the discovery of the pest.
A breach of these rules will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with these rules is liable to penalties as prescribed under Section 157(5) of the Act.	

¹Rooks: Best practice guidelines for the control and monitoring of pest rook populations. National Pest Control Agencies. August 2006.

²For the purpose of this Rule, control means shooting or any other disturbance of rooks or rookeries that cause rooks to become wary of control or cause rookeries to fragment and disperse. Control does not include the use of deterrents such as scarecrows and crucified rooks, which are "best practice" options for protection of arable land.

5.6.2. Eradication Pest Plants

The Plan is more appropriate than relying on voluntary action because there is less likely to be a delay between the arrival of the pest and taking action before the obvious effects of these pests are felt. The geographic area that the Plan applies to under this Programme is the whole Region.

Management Regime

Table 5-7: Management regime for Eradication Programme pest plants

Management regime for Eradication Programme pest plants	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037), eradicate the pest plants identified in <i>Table 5-4</i> from the Region to eliminate their adverse effects on economic well-being and/or their effects on the environment.</p> <p>AIMS</p> <ul style="list-style-type: none"> • With the exception of Chinese pennisetum and woolly nightshade, all known populations occurring on rateable land of the pest plants listed in <i>Table 5-4</i>, will be reduced to zero-levels within the first ten years of this Plan to 2027. • Reduce the population of Chinese pennisetum and woolly nightshade on rateable land to zero-levels by 2037. • Facilitate a quick response through appropriate funding within the first 10 years of this Plan (to 2027) that will enable the management of newly identified sites of the pest plants listed in <i>Table 5-4</i> as they become known. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Advocacy and education</p> <p>Horizons will carry out programmes to increase awareness of the Eradication Programme and the threat posed by these pests.</p> <p>These pests will be incorporated into generic biosecurity advocacy programmes, including information on limiting dispersal of these pests. Horizons will engage with central government agencies for the effective eradication of these organisms from non-rateable land, including where the Crown is the occupier. This may involve the development of MOUs as set out in <i>Section 5.3.5</i> of this Plan.</p> <p>Requirement to act</p> <p>Occupiers will be responsible for the control of woolly nightshade and Chinese pennisetum. The purpose for this rule is to place the onus on the Occupier to manage these pests.</p> <p>Occupiers will act in accordance with the Act and with rules for Eradication Programme pest plants as detailed in <i>Table 5-8</i>. Occupiers must inform Horizons of the presence of any of the eradication species on the land that they occupy. This rule is to ensure that that Horizons is aware of the location of these pests.</p> <p>TLA's, other roading authorities and rail authorities will be responsible for the control of infestations of these pests where they occur in the places they occupy in accordance with rule 5.8.2. The purpose of this rule is to ensure that those who are best placed to manage these pests safely in the road and rail corridor are responsible for control, and to ensure work on non-rateable land is undertaken.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>With the exception of Chinese pennisetum and woolly nightshade, Horizons will undertake the control of these plants on all known sites on rateable land. Where fiscal or other external restraints to achieving success prevent this, Horizons will work on the highest prioritised sites first.</p> <p>In the instance of Chinese pennisetum and woolly nightshade, Horizons will assist occupiers with the control of these plants.</p> <p>Horizons may undertake to release biocontrol agents for these pests where they are available and release is appropriate.</p> <p>Council inspection</p> <p>Horizons may conduct surveillance programmes for these pests.</p>	<p>OUTCOMES</p> <p>Major loss of pastoral productivity by production pests on the Eradication Programme is avoided.</p> <p>No measurable effect to the success of Horizons' biodiversity programmes is attributable to environmental pests in the Eradication Programme.</p> <p>The subject pests will be eradicated from the Region.</p>
<p>MONITORING</p> <p>Horizons will monitor the success of Horizons' pest control activity by recording the extent and/or density of the subject pest in known areas where the pest has been controlled. Sites will be monitored for a further five years after zero level has been achieved.</p> <p>The organisms listed in <i>Table 5-4</i> will also be monitored in accordance with <i>Section 6.1</i> of this Plan.</p>	

Specific Rules

Table 5-8: Specific rules for Eradication Programme pest plants

Specific rules for Eradication Programme pest plants	
Rule	Explanation
Duty to Inform Rule 5.8.1 All eradication pests	All occupiers (excluding the Crown, TLAs, roading and rail authorities) who become aware of any of the pests listed in <i>Table 5-4</i> in the place which they occupy must inform Horizons of the presence of these pests within 5 working days of the discovery of the pest.
TLAs, Road and Rail Authorities Rule 5.8.2 All eradication pests	Every TLA, roading authority and rail authority must not less than once every calendar year identify the presence of the pest plants identified in <i>Table 5-4</i> where they occur within the road reserve as defined in <i>Section 4.6</i> , (or with respect to KiwiRail, the rail corridor), and other places they occupy. The pests must be managed in accordance with an agreed Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an Authorised Person).
Occupier Responsibility Rule 5.8.3 Woolly nightshade and Chinese pennisetum	With the exception of the Crown, TLAs, roading and rail authorities; Every occupier must not less than a once year identify the presence of any woolly nightshade and Chinese <i>pennisetum</i> within the place they occupy. Upon discovery, the occupier must notify Horizons within 5 working days and then destroy all woolly nightshade and Chinese <i>pennisetum</i> in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person).
Other Rateable Land Rule 5.8.4 For other eradication pests except Woolly nightshade and Chinese pennisetum	With the exception of woolly nightshade and Chinese <i>pennisetum</i> , where the occupier of a place is opposed to control of the pests listed in <i>Table 5-4</i> being undertaken by an Authorised Person, the occupier must, within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of the pest, destroy the pest(s) listed in <i>Table 5-4</i> located in the place they occupy. The occupier must notify Horizons when the pest is destroyed within 5 working days of it being destroyed.
	A breach of these rules will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.

5.7. Progressive Containment Programme

Progressive Containment involves reducing the geographical distribution of the pest within the Region over time. Total eradication over the Region is not a cost-effective solution to protecting production or environmental values into the future, but preventing the spread limits the effects these pests have on these values. Coordination with TLAs and central government agencies is a key component of success. All of these organisms are environmental and/or production pest plants.

Table 5-9: Organisms on Horizons' Progressive Containment Programme

Species	Description	Effect
Australian sedge (pg. 55)	A perennial tussock-forming sedge. The leaves are Y-shaped in cross-section. Flowering stems are triangular in cross-section and sharply angled; flowers are grouped in catkin-like spikes that hang at the end of long, thin nodding stalks. The seed is a small, smooth triangular nut. A prolific seeder, with most seeds falling close to the parent plant. Distinguishable from other species of <i>Carex</i> in New Zealand by the way it shoots from the bottom of the original stalk and its distinctive flower/seed head. The plant normally flowers and seeds from October to February. It is generally not palatable to stock. It can form dense stands that exclude pasture species and will spread from infested land onto clear land. It does not compete successfully with well managed pastures. It is a difficult plant to control once established.	Production Pest
Banana passionfruit (pg. 46)	A large, vigorous, scrambling, evergreen vine with clinging tendrils. The leaves are toothed and three-lobed; the flowers are large, pink and tubular. Banana passionfruit flowers in winter-spring. The fruit are yellow when ripe, up to 12 cm long, cylindrical with a sweet-flavoured orange pulp surrounding seeds. Can smother forest canopies (up to 10 m high), topple shallow rooted trees and suppress indigenous regeneration. It can invade forest, margins, secondary forest as well as windbreaks, plantations, roadsides and wasteland.	Environmental Pest
Blackberry (pg. 55)	A prickly, scrambling perennial shrub growing to taller than 2 m. The leaves are compound in three to five oval toothed leaflets that are arranged in a five-fingered formation; the flowers are large and white or pink. It produces black edible berries and is spread via bird dispersal of seed and by cane extension. It forms impenetrable thickets if unchecked, although it does not compete successfully with well-managed pastures and the new canes are palatable to sheep. It will spread between properties from infested land onto clear land. It affects plantation forest establishment and suppresses other indigenous plants in scrub and forest margins. It can displace plant communities and restrict habitats of native organisms, and can reduce recreational and amenity values.	Production Pest
Boneseed (pg. 46)	A perennial shrub growing to 3 m with woody stems and many branches. The leaves are bright to dark green, alternate, toothed and practically hairless; the flowers are bright yellow, daisy-like, with 8-12 petals clustered at the ends of the branches. Flowers in September-February. Unlike most members of the daisy family, boneseed produces black coloured berries that are spread by birds. Boneseed is an aggressive coloniser that competes with indigenous species, especially in coastal areas, and is very tolerant of drought.	Environmental Pest
Broom species (exotic) (pg. 55)	Erect much-branched, almost leafless, deciduous woody shrubs 1.5-3 m tall. The leaves, when present, consist of three leaflets. The species of concern are the exotic Scotch (wild) broom (<i>Cytisus scoparius</i>), montpellier broom (<i>Genista manspessulana</i>), Spanish broom (<i>Spartium junceum</i>) and spiny broom (<i>Calicotome spinosa</i>). All species have golden-yellow flowers. These species flower in spring followed by the formation of explosive seed pods. The majority of seed dispersal occurs within 20 m of the parent plant and seed can remain viable in the soil for many years. Seedlings are palatable and unable to compete with productive pasture but once established in dense stands, it can shade out most species. It is spread between properties from infested land onto clear land, is widespread in river gravel and is a major contaminant in roading metal. It has the potential to spread rapidly and out-compete indigenous plant species of low-stature habitats.	Production Pest
Contorta pine (pg. 42)	A two-needled conifer capable of growing to 25 m, but also commonly stunted in growth with twisted branches. The species produces small green cones with a rough exterior after about four or five years. The cones remain closed for long periods of time before bursting open to release the fertile seeds. Seed dispersal is mainly by wind, with seed travelling up to 30 km from the parent plant, although most seed falls within 100 m of the parent plant. <i>Contorta</i> pine can grow in a wide range of habitats. <i>Contorta</i> pine poses a substantial threat across the Volcanic Plateau, especially in Tongariro National Park where it has been controlled for over 40 years. <i>Contorta</i> pine is a transformer weed in low-stature habitat such as tussock and alpine. It can also invade ungrazed land and can compete vigorously with commercial species within plantation forests. The subject species include <i>Pinus contorta</i> subsp. <i>contorta</i> , and <i>Pinus contorta</i> subsp. <i>murrayana</i> .	Environmental Pest

Species	Description	Effect
Darwin's barberry (pg. 46)	A spiny, thick stemmed woody evergreen shrub up to 4 m tall. The flowers are attractive, deep orange in colour, growing in simple drooping flower clusters up to 7 cm long; the dark purple berries have a bluish-white bloom. The small, shiny dark green holly-like leaves are alternate in clusters of three to five, together with five pronged, needle-sharp spines. Darwin's barberry flowers in July-September although flowers can still be present in January. Capable of invading forest margins and into light open forest (such as beech forest) where it can form impenetrable stands and prevent native regeneration. Can also grow on generally steeper pasture where stock grazing is not so intensive. It can block access to infrastructure and can restrict access to recreational areas. Poses a considerable threat to the open, cold beech forest of the Volcanic Plateau as well as the Ruahine and Tararua Ranges.	Environmental Pest
Dwarf mountain pine (pg. 42)	A small tree or multi-stemmed shrub with dense foliage and dark green rigid leaves. Leaves arranged in fascicles of two, 3-7cm long by 1-1.5mm wide. Seed wing oblong, approximately 1cm long. Wind dispersed seed. Invasion profile similar to <i>Contorta</i> pine - is a potential threat to indigenous ecosystems across the Volcanic Plateau.	Environmental Pest
Eelgrass (pg. 54)	A perennial freshwater aquatic plant which grows in lakes and flowing water and can grow to a height of 5.5 m. It is bottom rooting with stout rhizomes and long ribbon-like light green leaves growing from nodes at regular intervals along the rhizomes. There is no evidence of viable seed production in New Zealand, although mixed populations of this dioecious species do occur. Impacts on water bodies and the indigenous biodiversity supported by these systems. They can obstruct water bodies, grow rapidly and are capable of forming dense masses which out-compete indigenous aquatic species. The plants can also impede drainage, block water intakes, cause flooding and affect water quality. Requires deliberate planting to become established in a water body.	Environmental Pest
Egeria (pg. 54)	Egeria is a submerged perennial freshwater aquatic herb that grows in still and flowing waters. The plant is bottom rooted and produces long, slender and much branched leafy stems that grow to 4 or 5 m tall. It is larger and denser than <i>Lagarosiphon</i> , having 3-8 leaf whorls. Where the plant grows near the surface, it produces many white male flowers protruding just above the water surface in summer. The stems are brittle and fragment and root easily. Impacts on water bodies and the indigenous biodiversity supported by these systems. They can obstruct water bodies, grow rapidly and are capable of forming dense masses which out-compete indigenous aquatic species. The plants can also impede drainage, block water intakes, cause flooding and affect water quality. Dispersal is through the vectoring of vegetative fragments. Common vectors of dispersal include boats, trailers, water-skis, fishing equipment, eel nets, boots, dogs, kayaks, canoes, jet skis and coarse fish.	Environmental Pest
Evergreen buckthorn (pg. 46)	An evergreen shrub that grows to 20 m with leathery leaves which are glossy on the top surface, entire or with teeth that can be blunt or sharp. It is dioecious, with the female and male plants being very distinct from each other. The flowers are green, small, fragrant, 3-4 mm in diameter, with no petals, forming a loose branching cluster. Fruit are small, dark red berries ripening to black and produced only on female plants. Has the ability to form dense colonies, smothering indigenous plants and preventing establishment of indigenous plants. It can alter the structure of other indigenous forest ecosystems in a very short period of time. Poses a serious threat to coastal vegetation, competing strongly with indigenous coastal species, and can also restrict access to recreational areas. It also has the ability to colonise the margins of streams, forest margins and disturbed forests.	Environmental Pest
Field horsetail (pg. 55)	A perennial fern ally which is poisonous to livestock. It grows up to 80 cm tall, but dies back in winter. It prefers damp, open ground, particularly along stream and riverbanks. It is of limited distribution in New Zealand but is well established in Wanganui and Rangitikei, and is also found in the Manawatu and Horowhenua. While it spreads by rhizomes and small tubers, its control is extremely difficult. Effective management may be through the control of dispersal pathways. Has the capability to seriously affect pastoral productivity.	Production Pest
Gorse (pg. 55)	An evergreen 2-3 m tall shrub. The young stems are green, with the shoots and leaves modified into 1-3 cm green spines. Young seedlings produce normal leaves for the first few months; these are trifoliate, resembling a small clover leaf. The flowers are yellow, 1-2 cm and are produced throughout the year, but mainly in early spring. The fruit is a dark purplish-brown pod 2 cm long, partly enclosed by the pale brown remnants of the flower; the pod contains 2-3 small blackish, shiny, hard seeds, which are ejected when the pod splits open. Seeds remain viable for 30 years. It forms dense spiny thickets that prevent stock from grazing and reduces pasture production. It can spread between properties from infested to clean land and is a major production pest plant. It is widespread and present in high density throughout the country. The extent of dispersal via the seed bank, seed rain, through machinery and stock is considerable. It provides some benefits as a nursery plant for indigenous species, as a nitrogen fixer and a provider of pollen and nectar for bees. It can also stabilise steep slopes, which helps minimise the effects of erosion.	Production Pest

Species	Description	Effect
Grey willow (pg. 46)	A small deciduous tree growing to 7 m but often only 1-2 m. The leaves are shiny above and covered with soft grey hairs beneath. Catkins appear on the stems in spring before the leaves develop. Favours swampy areas and riverbanks, although will grow in a wide range of habitats up to 1,400 m asl. Dioecious, with male and female trees distinct from each other and it hybridises easily. An aggressive invader in wetlands, spreading rapidly to become the dominant vegetation, changing the composition of wetland habitat and interrupting ecological processes. Can impede water flow and increase the negative effects of flooding and is a particular threat to the Volcanic Plateau wetlands.	Environmental Pest
Hornwort (pg. 54)	A submerged freshwater perennial plant found in still or flowing water; often found in fertile, nutrient-rich waters but also grows in deep, clear lake waters to depths of 14 m. Hornwort does not have roots, instead having modified base leaves that anchor the plant into muddy substrates. Hornwort is often free floating with branched and brittle stems up to 7 m long. The leaves are forked with toothed edges and arranged in whorls of 7-12; the flowers are minute and no seed is set in New Zealand. Asexual propagation is via fragmentation of plant stems. Impacts water bodies and the indigenous biodiversity supported by these systems. They can obstruct water bodies, grow rapidly and are capable of forming dense masses which out-compete indigenous aquatic species. The plants can also impede drainage, block water intakes, cause flooding and affect water quality. Dispersal is through the vectoring of vegetative fragments. Common vectors of dispersal include boats, trailers, water-skis, fishing equipment, eel nets, boots, dogs, kayaks, canoes, jet skis and coarse fish. Rotting hornwort pollutes the water, which can kill any fauna present. Amenity and recreational values are impacted on as boating, fishing and swimming become difficult and unpleasant.	Environmental Pest
Lagarosiphon (pg. 54)	A vigorous perennial freshwater herb that grows submerged in lakes, ponds, rivers and streams. The leaves are arranged spirally around the stem, rather than whorled as is the case with other oxygen weeds, and are recurved backwards or downwards. The flowers are tiny, solitary, pink and female that do not produce seed in New Zealand. Oxygen weed is brittle, and fragments and roots easily. Impacts on water bodies and the indigenous biodiversity supported by these systems. They can obstruct water bodies, grow rapidly and are capable of forming dense masses which out-compete indigenous aquatic species. The plants can also impede drainage, block water intakes, cause flooding and affect water quality. Dispersal is through the vectoring of vegetative fragments. Common vectors of dispersal include boats, trailers, water-skis, fishing equipment, eel nets, boots, dogs, kayaks, canoes, jet skis and coarse fish.	Environmental Pest
Moth plant (pg. 46)	A perennial climber that is capable of growing up to 5 m or more. Leaves are opposite, dark green above, pale beneath. The flowers are white, fragrant, and bell-shaped, followed by large, pear-shaped pods containing kapok-like material surrounding the black seeds. Seed dispersal is by wind (in autumn and winter), with each pod containing many seeds. Any broken part of this plant weeps a milky white sap. Has the ability to compete with and displace indigenous species. In gardens, the fast growing and competitive nature of the plant can be a problem. The plant is poisonous and the sap has an irritant effect on contact. Moth plant can invade forest margins, disturbed habitat, riparian margins, banks and cliff faces, unmanaged areas and waste places.	Environmental Pest
Mountain pine (pg. 42)	Considered by many taxonomists to be a sub-species of <i>Pinus mugo</i> , mountain pine is distinguishable from dwarf mountain pine by cone characteristics. A tree 12-20m tall with dense foliage and dark green rigid leaves. Leaves arranged in fascicles of two, 3-7cm long by 1-1.5mm wide. Seed wing oblong, approximately 1cm long. Wind dispersed seed. Invasion profile similar to <i>Contorta</i> pine - is a potential threat to indigenous ecosystems across the Volcanic Plateau.	Environmental Pest
Nodding thistle (pg. 55)	A spiny-leafed (usually) biennial plant. The leaves are narrow and oblong, up to 18 cm long by 10 cm wide, with whitish margins at the bases of marginal spines. Flower stalks can be greater than 75 cm tall, with red-purple or (very rarely) white composite flowers. Flowers are followed by seed heads containing many seeds with thistledown. A highly aggressive agricultural pest affecting pasture production that is particularly invasive on light, sandy and volcanic soils. It can form dense stands of up to 150,000 plants/ha. Dense infestations obstruct livestock movement and prevent access to pasture. Nodding thistle produces 10,000 seeds per plant with 60-80% viability. Seed may be dormant in the soil for up to 20 years. A widespread plant and dispersal via the seed-bank, seed-rain, through machinery and stock is considerable.	Production Pest
Old man's beard (pg. 46)	A fast-growing, deciduous, perennial vine that on maturing becomes woody and brown or grey in colour. Young vines are ribbed and often purple. The leaf is composed of five leaflets; the flowers are creamy-white and loosely bunched (2-3 cm across). Old man's beard flowers in December-May, followed by very conspicuous fluffy greyish white seed heads in autumn through to early spring. A highly competitive vine that establishes rapidly in forest habitats, smothering canopy trees and forming dense carpets in the understorey, replacing indigenous species and suppressing regeneration. Old man's beard causes the collapse of forest fragments and is considered one of the country's worst weeds. The remaining forest habitat in the lowland and hill country of the Region is under	Environmental Pest / Production Pest

Species	Description	Effect
	extreme threat from Old man's beard. Old man's beard can affect forestry by reducing the vigour of young trees. On land that is not intensively grazed, old man's beard can encroach on to pastures leading to stock entanglement and death.	
Reed sweetgrass (pg. 54)	Reed sweetgrass is a large, aggressive aquatic perennial grass with long, upright, shiny, hairless, green leaves < 1 cm-7 cm wide that can grow to between 30 cm and 60 cm above water. Flowers appear in spikelets on stout, erect stems and are pale green in colour with purple spots. Reed sweetgrass has an extensive root system producing a sprawling mat of rhizomes. It is found in wet areas and can also grow in stable flowing rivers. Impacts on water bodies and the indigenous biodiversity supported by these systems. They can obstruct water bodies, grow rapidly and are capable of forming dense masses which out-compete indigenous aquatic species. The plants can also impede drainage, block water intakes, cause flooding and affect water quality.	Environmental Pest
Scots pine (pg. 42)	A tree reaching up to 35m tall, with stout needles 2.5-7 cm long by 1-1.5 mm wide. Grey-green to blue-green leaves are silvery in appearance. Leaves are twisted. Similar to dwarf mountain pine and mountain pine but the cones are held on short stalks. Invasion profile similar to <i>Contorta</i> pine - is a potential threat to indigenous ecosystems across the Volcanic Plateau.	Environmental Pest
Tutsan (pg. 55)	An evergreen or semi-evergreen shrub up to 1.5 m tall. The flowers are pale yellow, appearing in clusters of 2-8 flowers. Fruits are red, becoming black when ripe. Tutsan leaves are pale green, often bluish-green below, egg-shaped and attached to stems at the broad end of the leaf. Tutsan flowers from November to February followed by fruit set. Seeds are dispersed primarily by birds. Tutsan is a highly invasive plant, especially of marginal production land, but can establish in riparian margins, forest margins and roadsides. Tutsan has also been recorded growing in shade under forest canopy. Tutsan escaped from cultivation in 1870 and is now found throughout New Zealand, favouring marginal land and higher rainfall areas. Tutsan is non-toxic but is unpalatable to stock.	Production Pest
Variegated thistle (pg. 55)	A robust erect annual. The glossy rosette leaves have white veins and blotches giving it a variegated look. The large purple flower is surrounded by many sharp spines. They are short lived, flowering and seeding in the summer following germination. Up to 6,000 seeds per plant can be produced and remain viable for more than 9 years. Plants are found in overgrazed pasture, wasteland, along roadsides and in drought prone areas. It also grows well on high fertility soils. Can form dense infestations, suppressing pasture species. Can be injurious and toxic to stock.	Production Pest
Yellow bristlegrass (pg. 55)	A summer growing annual grass, with a seed head that consists of a large (up to 10 mm wide) golden to brown bristle. Flat leaf stem. Yellow bristle grass is an aggressive annual-seeding plant which spreads rapidly through pasture, reducing pasture quality. Cows don't willingly eat it, leading to low pasture utilisation. Grazing avoidance leads to rapid re-infestation and an opening for other weeds. Seeds pass through the rumen and are spread around the farm in dung. Seeds are also spread by water, soil movement, animals, and as contaminants of hay and maize. The barbed seeds stick to and are often carried in fur, feathers, or clothing.	Production Pest
Yellow ragwort (pg. 55)	A robust, branched, biennial or perennial plant up to 1.5 m tall. The plant emits an unpleasant smell when crushed. It produces a basal rosette of pinnately lobed leaves and numerous bright yellow flowers in flat-topped clusters in its second year. It flowers between November and April. It is competitive with pasture species and subsequently production is reduced when infestations occur. The plant contains alkaloids that are toxic to some stock. The plant is able to produce 50,000-150,000 seeds/plant, of which 70% may be viable. Sheep are effective in controlling small plants; however it is unpalatable to cattle, deer or horses. It is widespread in New Zealand. The extent of dispersal via the seed-bank, seed rain, through machinery and stock is considerable.	Production Pest

The page numbers quoted refer to the page on which the management regime for each species can be found.

Reason for Inclusion

Classed as production and/or environmental pests, the pest plants in the Progressive Containment Programme are capable of causing adverse effects to the productive capacity of the Region, and/or to the Region's environmental values, as indicated in the Description and by the Effect of each of the pests in *Table 5-9*. For these species, it is appropriate that Horizons regulate for their management in the Plan, because the successful containment of these species requires coordination of action at regional scale. The benefits of progressive containment accrue to a wider community than those directly affected by the presence of the pests on their property.

In some situations it is not possible to define a zone of containment on a map. This may be because the absolute distribution of the pest is not known, or that the distribution of the pest is generally considered region-wide but is known to be locally patchy. For these pests, a 'clear land' rule will apply as a means of ensuring that land that is at an early stage of infestation is made clear of the pest (keeping clear land clear), with a good neighbour rule then utilised as a means of reducing the spread. The appropriateness of having a plan to manage these pests compared to relying on voluntary action is discussed below.

Boundary Distance and Infestation Thresholds

To mitigate the lack of information regarding specific infestation locations and sizes, Horizons has taken a buffer and infestation size approach to applying the clear land and good neighbour rules. *Table 5-10* presents the threshold infestation size that pertains to the maximum size per property that the clear land rule applies for each pest and the nominal distance for management from the boundary for application in the good neighbour rule for each pest.

Table 5-10: Progressive Containment Programme Pest plants boundary distance and infestation thresholds for Good Neighbour and Clear Land rules

Species to be managed	Nominal distance for management from the boundary	Threshold infestation size
Australian sedge	Up to 10m	0.5 ha (5000 m ²)
Banana passionfruit	Up to 50m	0.1 ha (1000 m ²)
Blackberry	Up to 50m	0.25 ha (2500 m ²)
Boneseed	Up to 50m	0.01 ha (100 m ²)
Broom	Up to 10m	0.5 ha (5000 m ²)
Darwin's barberry	Up to 50m	0.25 ha (2500 m ²)
Evergreen buckthorn	Up to 50m	0.25 ha (2500 m ²)
Field horsetail	Up to 10m	0.01 ha (100 m ²)
Gorse	Up to 10m	0.5 ha (5000 m ²)
Grey willow	Up to 20m	0.25 ha (2500 m ²)
Moth plant	Up to 20m	0.25 ha (2500 m ²)
Nodding thistle	Up to 50m	0.25 ha (2500 m ²)
Old man's beard	Up to 20m	0.1 ha (1000 m ²)
Ragwort	Up to 20m	0.25 ha (2500 m ²)
Tutsan	Up to 50m	0.25 ha (2500 m ²)
Variiegated thistle	Up to 50m	0.25ha (2500 m ²)
Yellow bristle grass	Up to 10m	0.25 ha (2500 m ²)

5.7.1. Contorta, Dwarf Mountain, Mountain, and Scots Pines

Contorta, dwarf mountain, mountain, and Scots pines are grouped on the basis that they are managed the same way for the same objective, inside the same Active Management Zone. The Active Management Zone is presented as *Map 5-1* in this Plan. The Plan is more appropriate than relying on voluntary action because the effects of these conifers tend to be biodiversity effects on indigenous habitats that are in the public interest more than the private interest to manage on private land. Having a Plan allows Horizons to share the costs of management between the public and private interests. The geographic area that the Plan applies to is the Active Management Zone for *Contorta*, dwarf mountain, mountain, and Scots pines (*Map 5-1*).

Management Regime

Table 5-11: Management regime for *Contorta*, dwarf mountain, mountain, and Scots pines

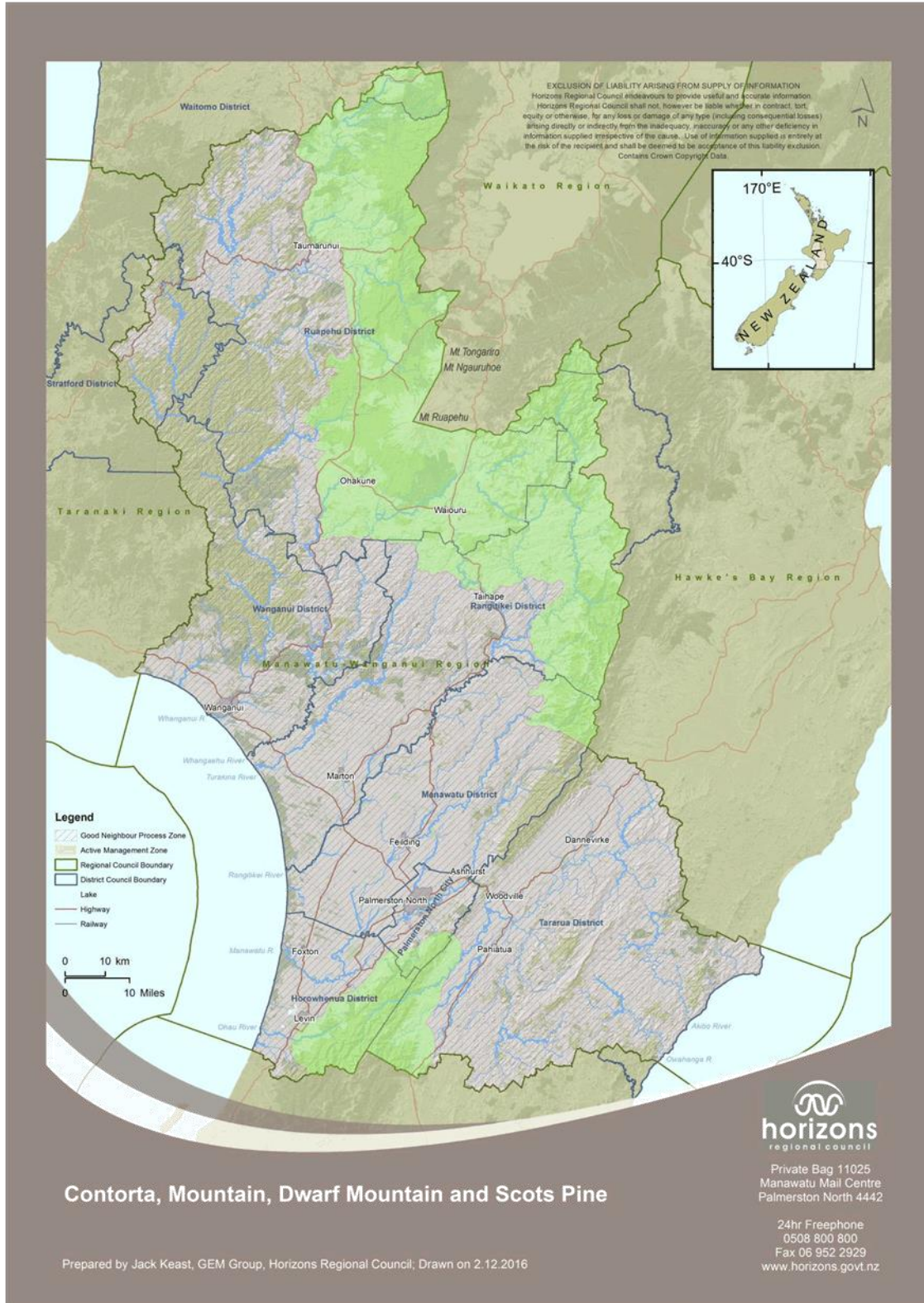
Management regime for <i>Contorta</i> , dwarf mountain, mountain, and Scots pines	
<p>OBJECTIVES</p> <p>Over the duration (2017 – 2037) of the Plan progressively contain or reduce the incidence of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine to reduce adverse effects on the environment.</p> <p>AIMS</p> <ul style="list-style-type: none"> to reduce <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine populations, within the Active Management Zone (<i>Map 5-1</i>). to work according to the aims and actions of the Nature Central Wilding Conifer Implementation Plan within the 10 year period to 2027 and beyond. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Advocacy and education</p> <p>Horizons will incorporate <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine into advocacy programmes focused on the threats to and protection of environmental values. Horizons will collaborate with other agencies.</p> <p>Horizons will maintain and enhance relationships with the key land management agencies on the Volcanic Plateau. There is the potential for MOUs to incorporate other species and allow for sharing of resources where responsibilities and outcomes are agreed on. Any MOUs will stipulate the requirement for control of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, to be under sustained management.</p> <p>Horizons may implement a targeted awareness campaign that focuses on <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine.</p> <p>Horizons will provide advice and information on <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, to occupiers and other interested parties.</p> <p>Requirement to act</p> <p>Occupiers in the Active Management Zone for <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine must inform Horizons of the presence of and management of these species. These requirements will ensure that Horizons is aware of the presence of pests on land.</p> <p>Occupiers will act in accordance with the Act, and the rules in <i>Table 5-12</i>.</p> <p>Occupiers of the Karioi Forest Zone are responsible for the control of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine as described in <i>Table 5-12</i> rules 5.12.1 and 5.12.2.</p> <p>TLAs, other roading authorities and rail authorities will be responsible for the control of infestations of these pests where they occur in the places they occupy in accordance with rule 5.12.4. The purpose of this rule is to ensure that those who are best placed to manage these pests safely in the road and rail corridor are responsible for control, and to ensure work on non-rateable land is undertaken.</p> <p>These rules will ensure the reduction of pest conifers in places where they can spread onto the sub-alpine habitats of habitats of the Volcanic Plateau, upper Ruahine Range and Tararua Range.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons will undertake direct control of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, on rateable land within the Active Management Zone (<i>Map 5-1</i>), with a focus on preventing further spread. Horizons will not be responsible for site clean-up, landscaping or replacement of trees.</p> <p>Horizons will not conduct control of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, outside of the Active Management Zone with the exception of prioritised sites of high natural value and site-led initiatives.</p> <p>The New Zealand Defence Force (NZDF) has a control programme that commits to the management of wilding pines species on the land that they occupy.</p> <p>The Department of Conservation (DOC) has a control programme that commits to the management of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine on the Volcanic Plateau.</p> <p>Council inspection</p> <p>Horizons may conduct a surveillance programme for <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine.</p> <p>Horizons will enforce control of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, where present in any road and rail reserves within the Active Management Zone, and in the Karioi Forest Zone.</p>	

<p>MONITORING</p> <p>Horizons will monitor the success of the previous pest control event by recording the extent and/or density of Contorta pine, dwarf mountain pine, mountain pine, and Scots pine, in known areas where these species have been controlled by Horizons. Sites will be monitored annually for a further five years.</p> <p>Contorta pine, dwarf mountain pine, mountain pine, and Scots pine, will also be monitored in accordance with <i>Section 6.1</i> of this Plan.</p>	<p>OUTCOMES</p> <p>Contorta pine, dwarf mountain pine, mountain pine, and Scots pine, are controlled to zero-levels within the Active Management Zone, and are controlled in conjunction with the other key agencies involved in land management on the Volcanic Plateau to protect the natural values of the Volcanic Plateau.</p> <p>A coherent strategic approach for management of Contorta pine, dwarf mountain pine, mountain pine, and Scots pine, results in protection of the natural values of indigenous habitats.</p> <p>High-value natural areas prioritised for protection under the Regional Biodiversity Programme are maintained free of Contorta pine, dwarf mountain pine, mountain pine, and Scots pine.</p>
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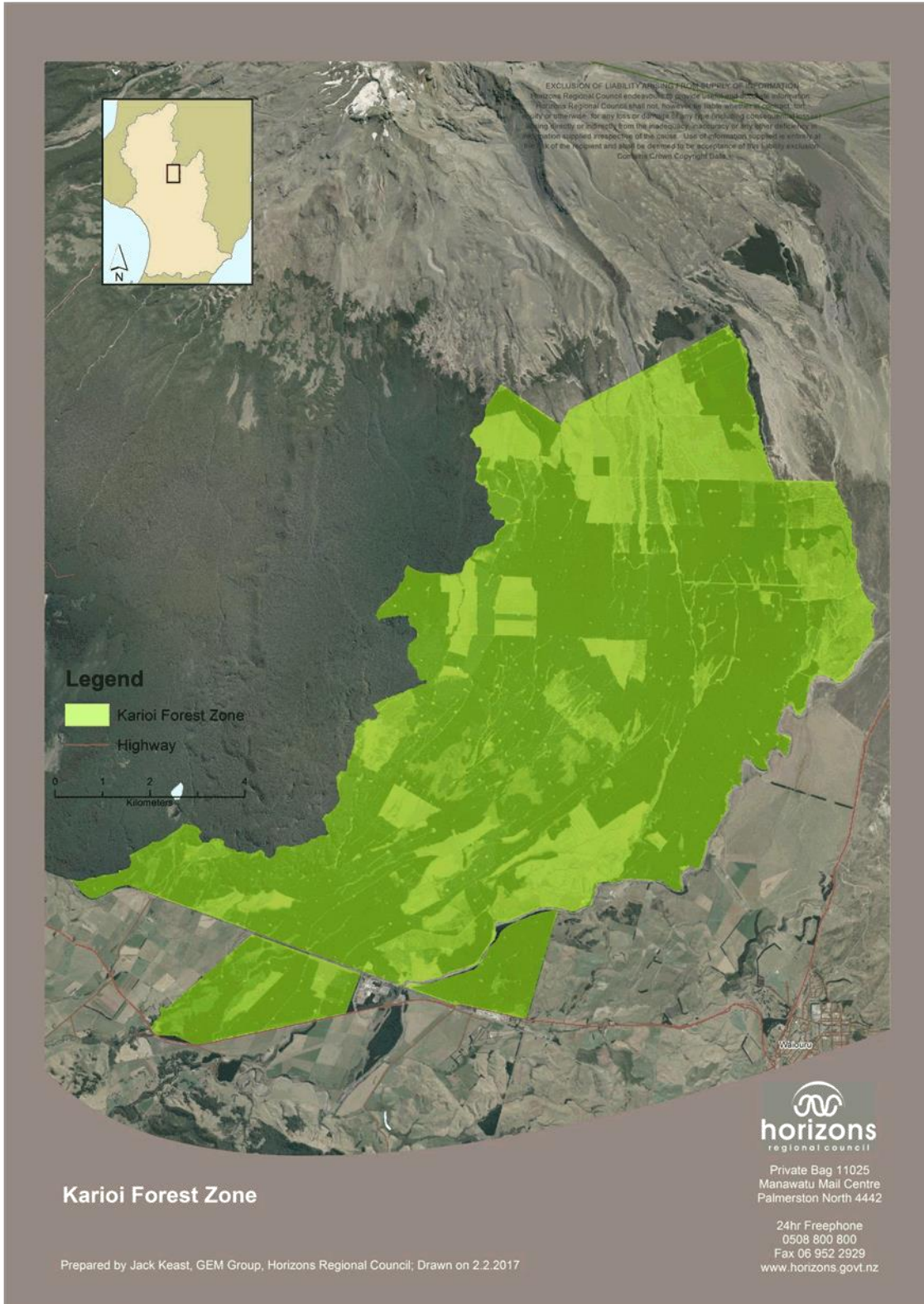
Specific Rules

Table 5-12: Specific rules for Contorta, dwarf mountain, mountain, and Scots pines

Specific rules for Contorta, dwarf mountain, mountain, and Scots pines	
Rule	Explanation
Karioi Forest Zone Progressive Containment Rule 5.12.1	<p>An occupier of land within the Karioi Forest Zone (<i>Map 5-2</i>) must:</p> <ul style="list-style-type: none"> (i) destroy all Contorta pine, dwarf mountain pine, mountain pine, and Scots pine in the Karioi Forest Mixed Species Plantation Area at the time of harvest. An occupier must maintain to zero levels of these pests in compartments adjacent to, and within, recently felled compartments and exposed wetlands or stream margins. (ii) maintain zero levels of all Contorta pine, dwarf mountain pine, mountain pine, and Scots pine within 30 metres of the Karioi Forest Mixed Species Plantation Area. (iii) inspect every three calendar years, the area of the: <ul style="list-style-type: none"> - Karioi Forest Balance Area subject to control; and - Karioi Forest Mixed Species Plantation Area buffer (within 30m of the current Karioi Forest Species Plantation Area); <p>for Contorta pine, dwarf mountain pine, mountain pine, and Scots pine. All Contorta pine, dwarf mountain pine, mountain pine, and Scots pine found shall be destroyed by the occupier within 21 days of discovery (or as negotiated with an Authorised Person).</p>
Karioi Forest Zone Monitoring Report Rule 5.12.2	<p>The occupier(s) of the Karioi Forest must provide Horizons with annual reports detailing how rule 5.12.1 is being complied with. The annual reports must be provided by 31 July for the previous calendar year and:</p> <ul style="list-style-type: none"> (i) detail the physical area where destruction has been carried out; (ii) detail the total area (in hectares) subject to ongoing management of Contorta pine, dwarf mountain pine, mountain pine, and Scots pine; and (iii) provide a current map showing the extent of the Karioi Mixed Species Plantation Area.
Duty to Inform Rule 5.12.3	<p>With the exception of the occupiers above, all occupiers of rateable land in the Active Management Zone for Contorta pine, dwarf mountain pine, mountain pine, and Scots pine, who become aware of these pests in the places they occupy, must inform Horizons of the presence of the pest(s) within 5 working days of the discovery of the pest.</p>
TLAs, Road and Rail Authorities Rule 5.12.4	<p>Every TLA, roading authority and rail authority must not less than once every calendar year identify the presence of Contorta pine, dwarf mountain pine, mountain pine, and Scots pine where they occur within the Active Management Zone for these species within the road reserve as defined in <i>Section 4.6</i>, (or with respect to KiwiRail, the rail corridor), and other places they occupy.</p> <p>The pests must be managed in accordance with an Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an authorised person).</p>
Other Private Land Rule 5.12.5	<p>Where the occupier is opposed to action being undertaken by an Authorised Person to destroy Contorta pine, dwarf mountain pine, mountain pine, and Scots pine within the Active Management Zone for these species, the occupier must destroy the pests located in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of these pests.</p> <p>The occupier must notify Horizons within 5 working days of the destruction of the pest.</p>
<p>A breach of these rules will create an offence under Section 154N (19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.</p>	



Map 5-1: Contorta, dwarf mountain, mountain, and Scots pine Active Management and Good Neighbour Process Zones



Map 5-2: The Karioi Forest Zone

5.7.2. Other Mapped Progressive Containment Pest Plants

Banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant, and old man's beard are grouped into the "Other Mapped Progressive Containment Plants" on the basis that these are all managed by Horizons as the lead agency inside an Active Management Zone. The Active Management Zone is represented on maps pertaining to each of these pests within this Plan (*Map 5-3 to Map 5-9*). Outside the Active Management Zone (inside the Good Neighbour Process Zone), a good neighbour rule is used to reduce the spread of these pests. The Plan is more appropriate than relying on voluntary action because the effects of these plants are mainly biodiversity effects that are in the public interest more than the private interest to manage on private land. Having a Plan allows Horizons to share the costs of management between the public and private interest. The geographic area that the Plan applies to for the Other Mapped Progressive Containment Pest Plants is the whole region.

Management Regime

Table 5-13: Management regime for other mapped Progressive Containment pest plants

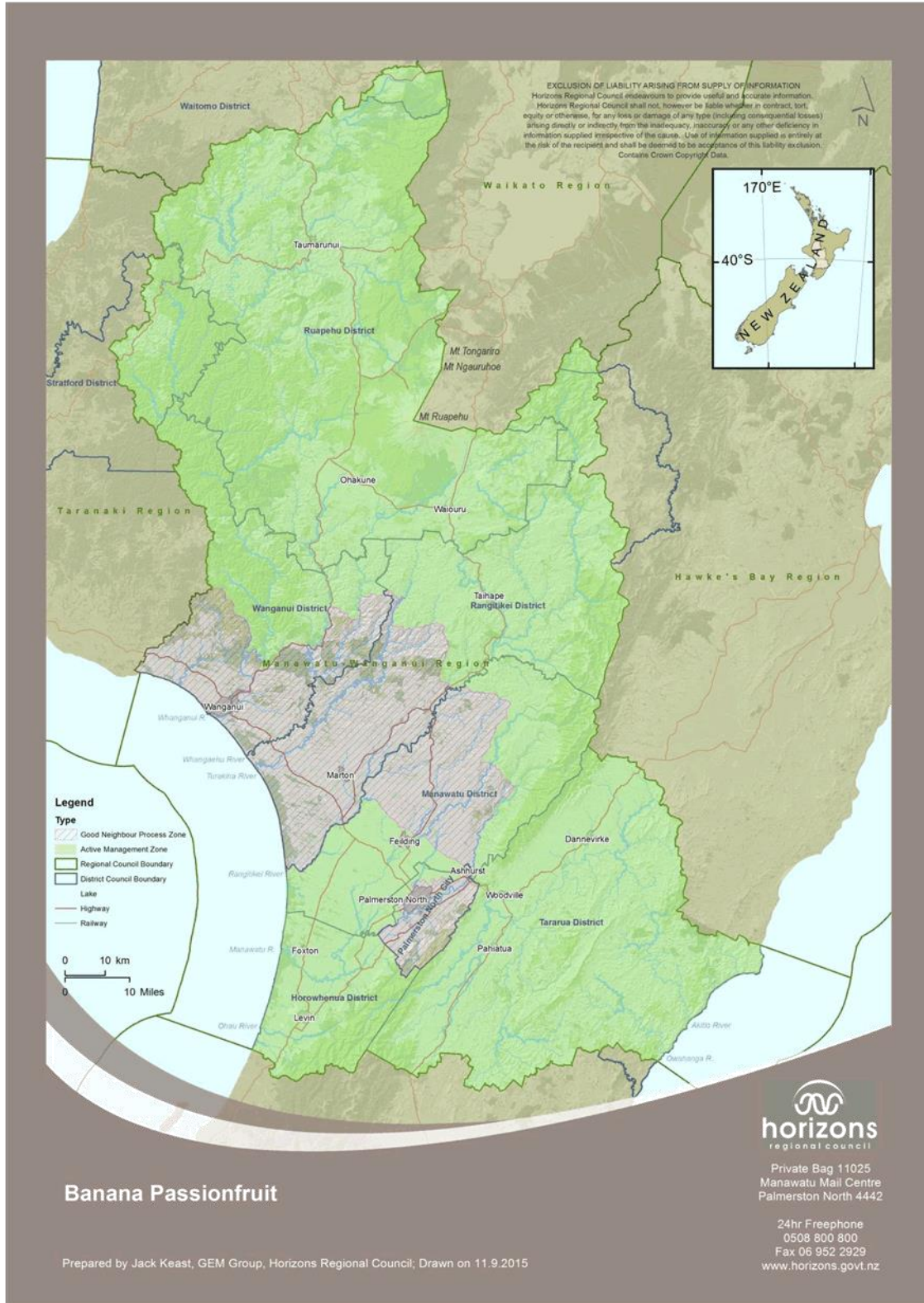
Management regime for other mapped Progressive Containment pest plants: banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037), progressively contain or reduce banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant, and old man's beard to and within the Good Neighbour Process Zone identified for these plants to reduce adverse effects on the environment.</p> <p>AIMS</p> <p>Over the first ten years of the Plan (to 2017):</p> <ul style="list-style-type: none"> To reduce levels of banana passionfruit in the banana passionfruit Active Management Zone (<i>Map 5-3</i>). To reduce levels of boneseed in the boneseed Active Management Zone (<i>Map 5-4</i>). To reduce levels of Darwin's barberry in the Darwin's barberry Active Management Zone (<i>Map 5-5</i>). To reduce levels of evergreen buckthorn in the evergreen buckthorn Active Management Zone (<i>Map 5-6</i>). To reduce levels of willow with wetland habitat or where it threatens wetland habitat in the grey willow Active Management Zone (<i>Map 5-7</i>). To reduce levels of moth plant in the moth plant Active Management Zone (<i>Map 5-8</i>). To reduce levels of old man's beard in the old man's beard Active Management Zone (<i>Map 5-9</i>). To reduce or prevent the further spreading of these pests onto land that is clear or being cleared of the pest in the Good Neighbour Process Zone within the first 10 years of the Plan to 2027 and beyond. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Council inspection</p> <p>Horizons may conduct surveillance programmes in the Active Management Zone.</p> <p>Advocacy and education</p> <p>Horizons will carry out programmes to increase awareness of the Progressive Containment Programme and the threats posed by these pests.</p> <p>Banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard will be incorporated into generic biosecurity advocacy programmes, including information on limiting dispersal of these pests.</p> <p>Requirement to act</p> <p>Occupiers of rateable land within the Active Management Zone must inform Horizons of the presence of these pests on their land. All Occupiers will act in accordance with the Act. These requirements will ensure that Horizons is aware of the presence of pests on land.</p> <p>In situations where occupiers of rateable land inside the respective Active Management Zones oppose the control methods used by Horizons, those occupiers will become responsible for the control of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard on the land they occupy in accordance with the good neighbour rule process outlined in <i>Section 4.7</i> of this Plan and the good neighbour rule detailed in <i>Table 5-14</i>. The purpose of this rule is to place onus of control onto occupiers who do not wish Horizons to control the pest for them.</p> <p>Outside their respective Active Management Zones, all occupiers are responsible for the control of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard in accordance with the good neighbour rule process outlined in <i>Section 4.7</i> of this Plan, and the good neighbour and the clear land rules detailed in <i>Table 5-14</i>. These rules are to place onus onto Occupiers for keeping clear land clear, and managing the spread of pests onto neighbouring land of an Affected Occupier.</p> <p>Occupiers of non-rateable Māori owned land, Crown Agencies, TLAs, other roading authorities and rail authorities will be responsible for the control of infestations of these pests within the respective Active Management Zones of these pests where they occur in the places they occupy in accordance with rule 5.14.4. The purpose of this rule is to ensure that those who are best placed to manage these pests safely in the road and rail corridor are responsible for control, and to ensure work on non-rateable land is undertaken.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons will undertake direct control of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow (where it is in or near a wetland habitat), moth plant, and old man's beard on rateable land within their respective Active Management Zones.</p> <p>Horizons may conduct control of these species outside their respective Active Management Zones and/or on non-rateable land under non-regulatory site-led management programmes or community initiatives, at Horizons' discretion.</p> <p>Horizons will work with Crown agencies, SOEs, and Territorial Local Authorities on the effective management of these species on non-rateable land.</p> <p>Horizons may undertake to release biocontrol agents for these pests where they are available and release is appropriate.</p>	

Management regime for mapped progressive containment pest plants: banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard	
<p>MONITORING</p> <p>Horizons will monitor the success of the previous pest control event by recording the extent and/or density of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard in areas where the pest has been controlled by Horizons.</p> <p>Managed sites will be monitored annually for a further five years after zero-levels have been achieved.</p> <p>Banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard will also be monitored in accordance with <i>Section 6.1</i> of this Plan.</p>	<p>OUTCOMES</p> <p>Native ecosystems, riparian habitats, and soil conservation retirement blocks are protected from the adverse effects of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard, and their management.</p> <p>Areas that are clear of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant and old man's beard, remain clear of these species.</p>

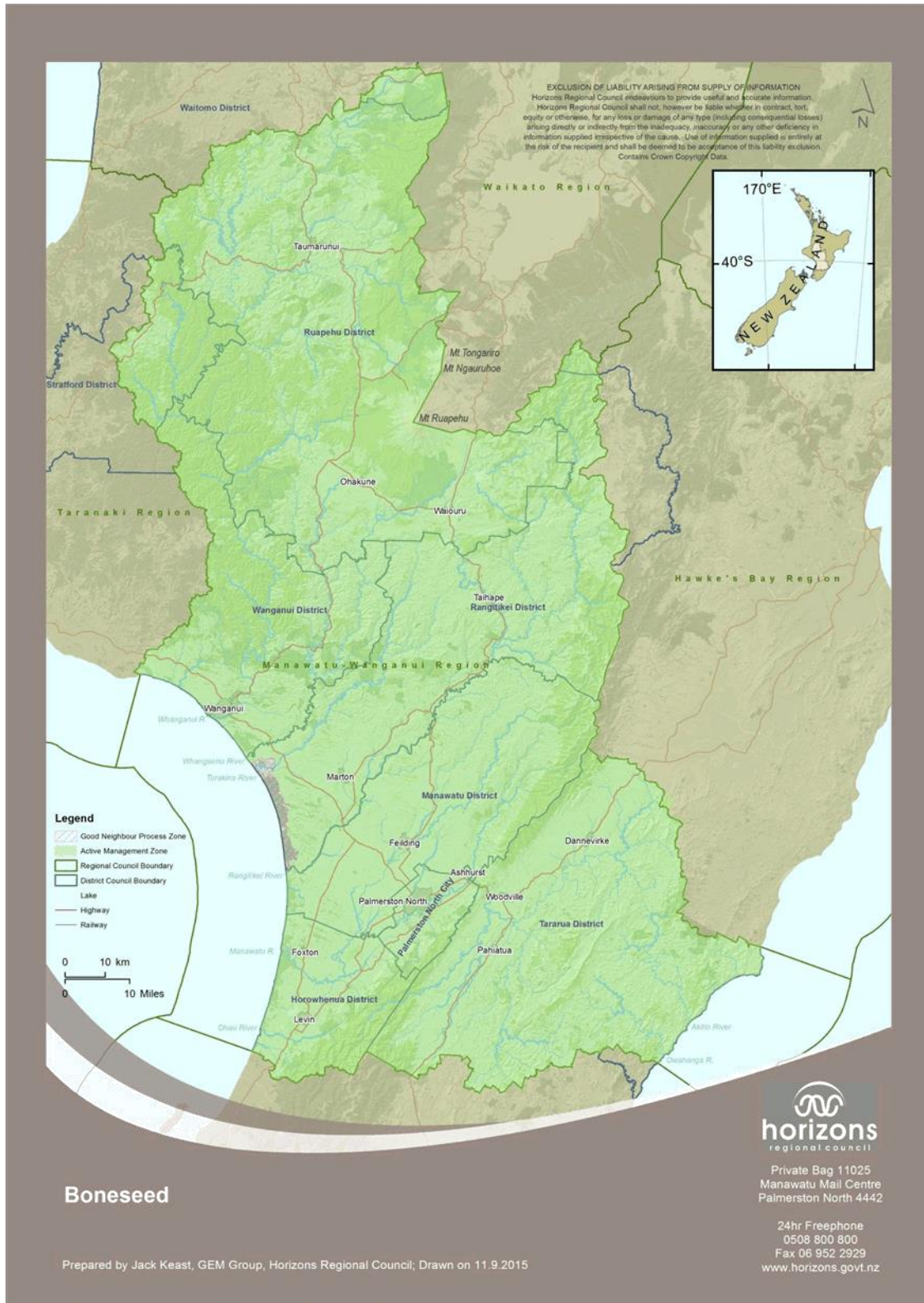
Specific Rules

Table 5-14: Specific rules for mapped progressive containment plants

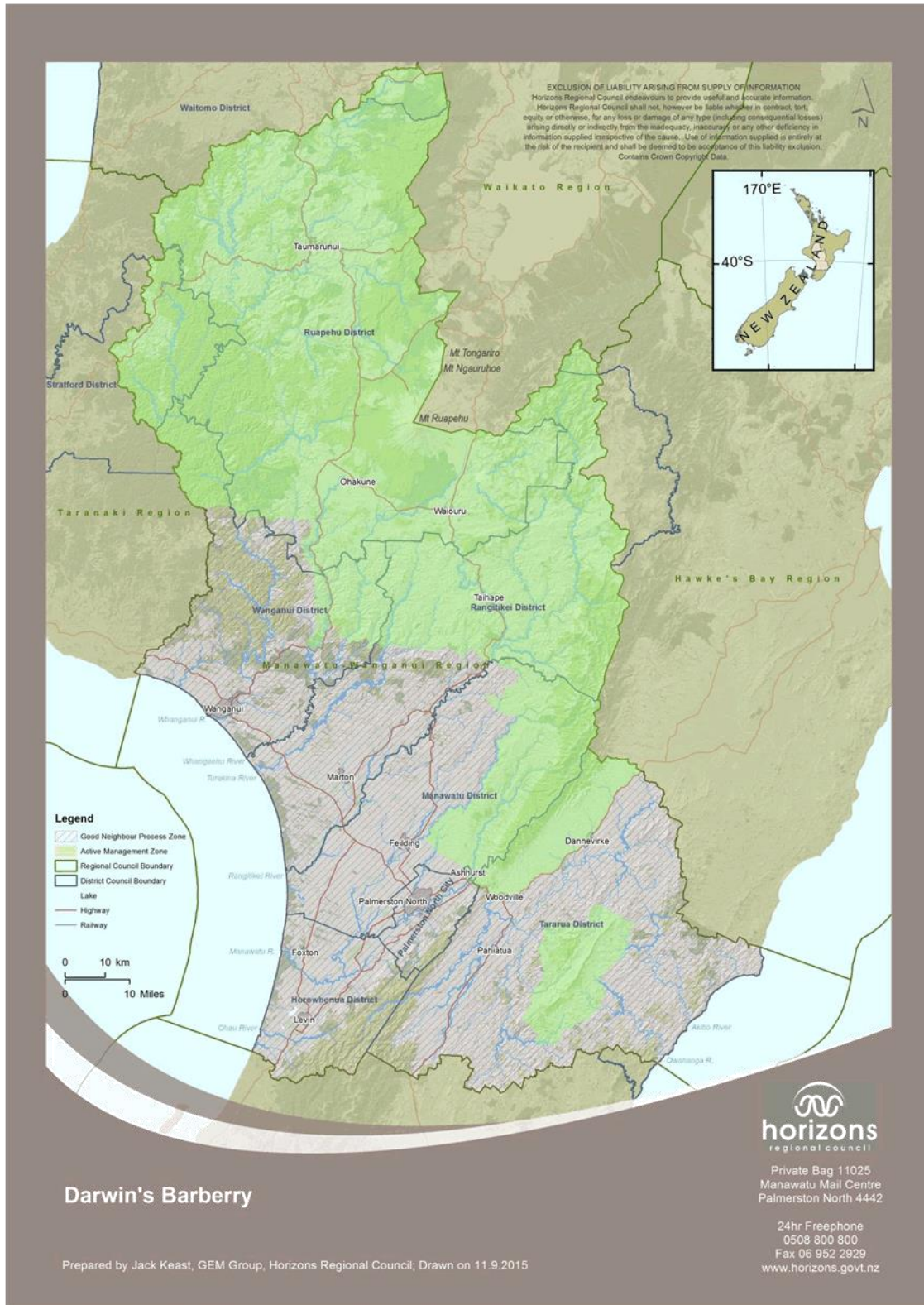
Specific rules for mapped progressive containment pest plants	
Rule	Explanation
<p>Duty to Inform Rule 5.14.1</p> <p>Within the Active Management Zone</p>	<p>All occupiers of rateable land greater than 4 hectares within the respective Active Management Zone for banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard, who become aware of the presence of these pests in the place which they occupy, must inform Horizons of the presence of that pest within 5 working days of the discovery of the pest.</p>
<p>Rateable Land Rule 5.14.2</p> <p>Within the Active Management Zone</p>	<p>Where the occupier of rateable land is opposed to action being undertaken by an Authorised Person to destroy banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard within the Active Management Zone, the occupier must, destroy the pests located in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of these pests.</p> <p>The occupier must notify Horizons within 5 working days of the destruction of the pest.</p>
<p>TLAs, Road and Rail Authorities Rule 5.14.3</p> <p>Within the Active Management Zone</p>	<p>Every TLA, roading authority and rail authority, must not less than once every calendar year identify the presence of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard within the Active Management Zone, where they occur within the road reserve as defined in <i>Section 4.6</i>, (or with respect to KiwiRail, the rail corridor), and other places they occupy.</p> <p>The pests must be managed in accordance with an agreed Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an Authorised Person).</p>
<p>Good Neighbour Rule 5.14.4</p> <p>Within the Active Management Zone</p>	<p>Other occupiers of non-rateable land (including occupiers of non-rateable Māori owned land, and Crown Agencies) within the respective Active Management Zone for banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard must destroy these species within the place(s) they occupy within the 'nominal distance for management from the boundary' specified in <i>Table 5-10</i> for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the land they occupy in the Active Management Zone. Reasonable Measures include participation in a Horizons-led Mapped Progressive Containment Pest Plant Programme.</p>
<p>Clear Land Rule 5.14.5</p> <p>In the Good Neighbour Process Zone</p>	<p>All occupiers within the Good Neighbour Process Zone, where banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant, or old man's beard is present within the 'Threshold Infestation Size' specified in <i>Table 5-10</i>, must destroy that pest in the place(s) they occupy within 21 calendar days of the discovery of the pest(s) (or within a time period as negotiated with an Authorised Person).</p>
<p>Good Neighbour Rule 5.14.6</p> <p>In the Good Neighbour Process Zone</p>	<p>With the exception of occupiers covered by rule 5.14.5, all occupiers within the Good Neighbour Process Zone (including the Crown, roading and rail authorities) must destroy any banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard in the place(s) they occupy within the 'nominal distance for management from the boundary' specified in <i>Table 5-10</i> for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the land they occupy in the Good Neighbour Process Zone.</p>
<p>A breach of these rules will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.</p>	



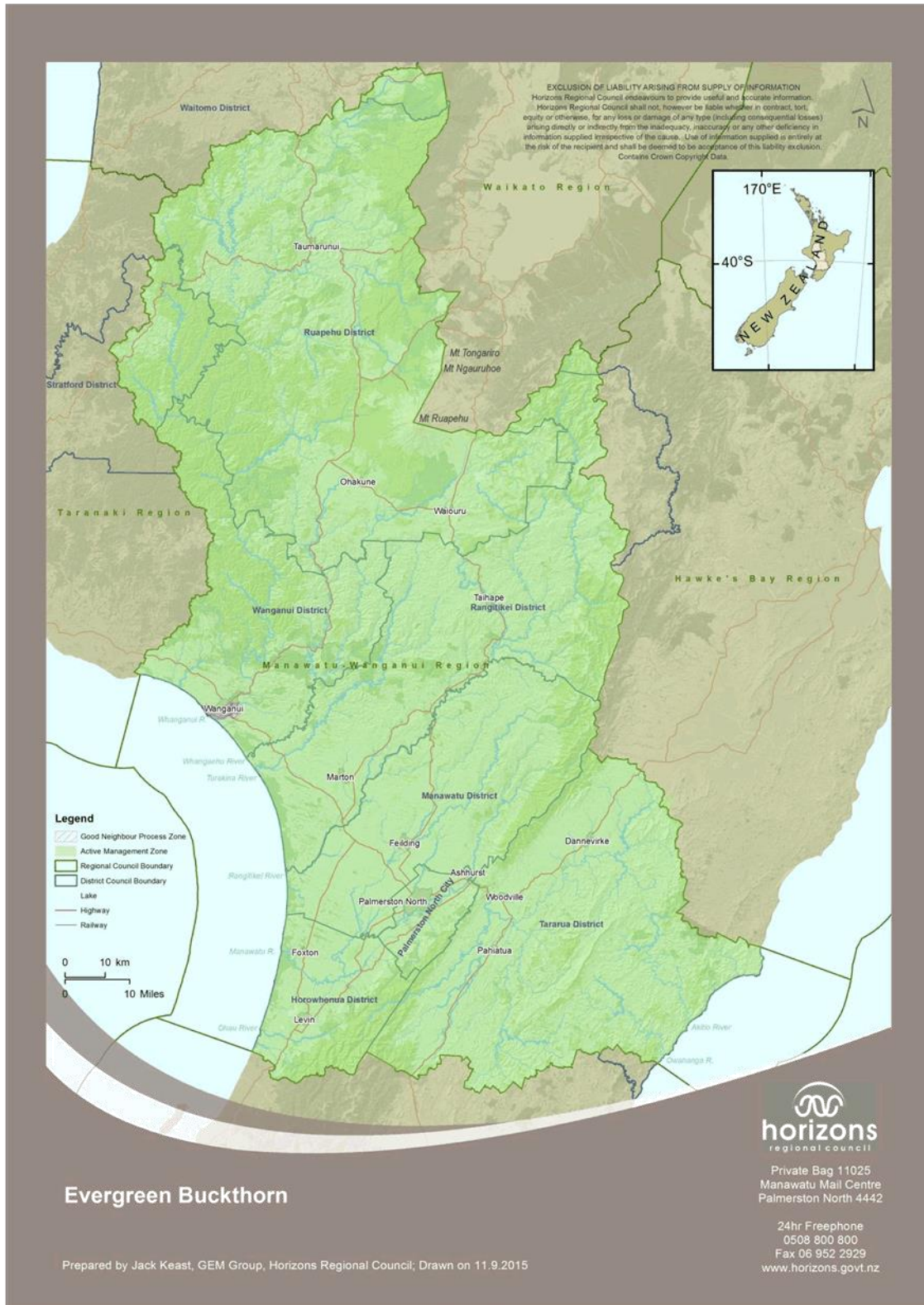
Map 5-3: Banana passionfruit Active Management and Good Neighbour Process Zones



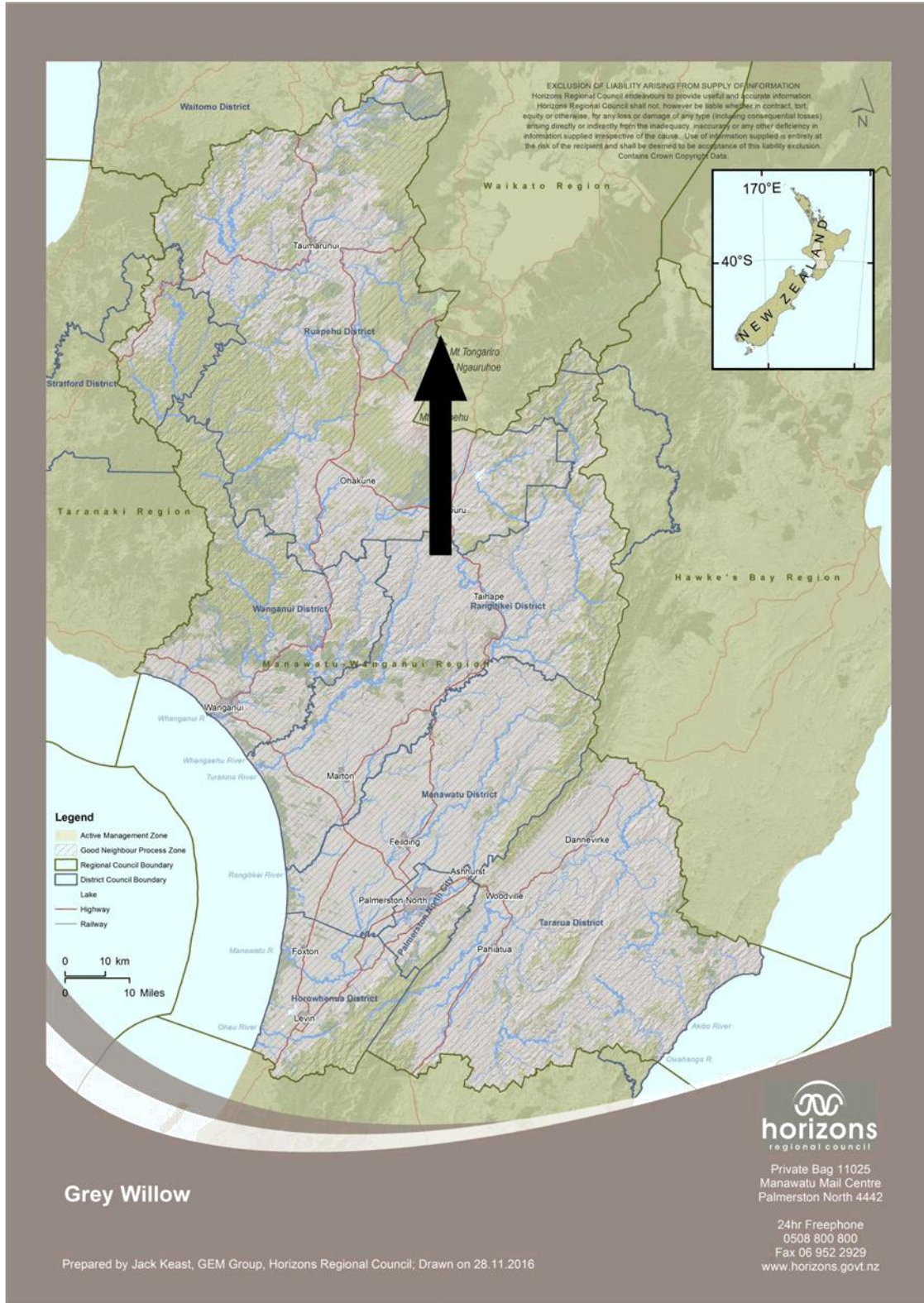
Map 5-4: Boneseed Active Management and Good Neighbour Process Zones



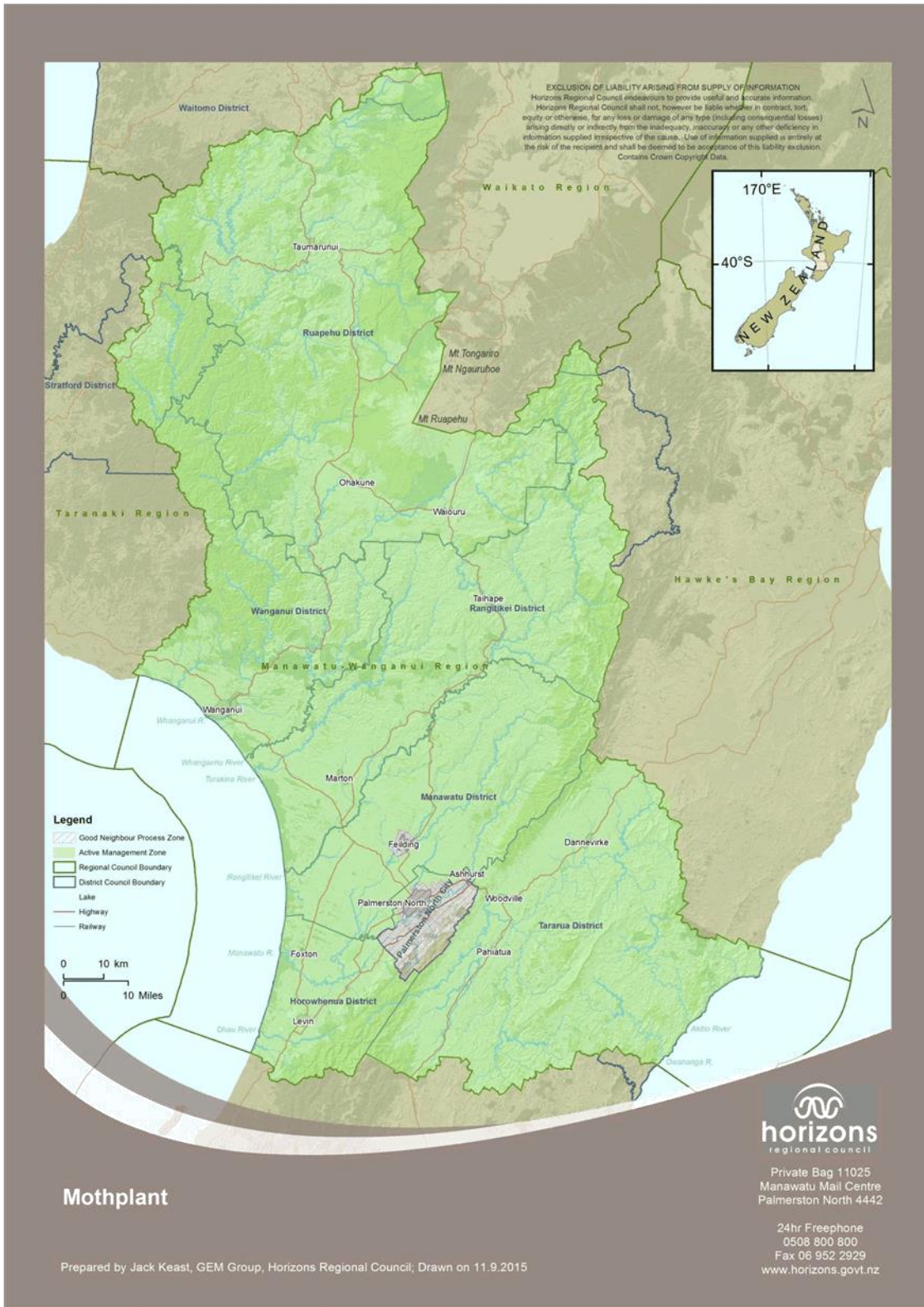
Map 5-5: Darwin's barberry Active Management and Good Neighbour Process Zones



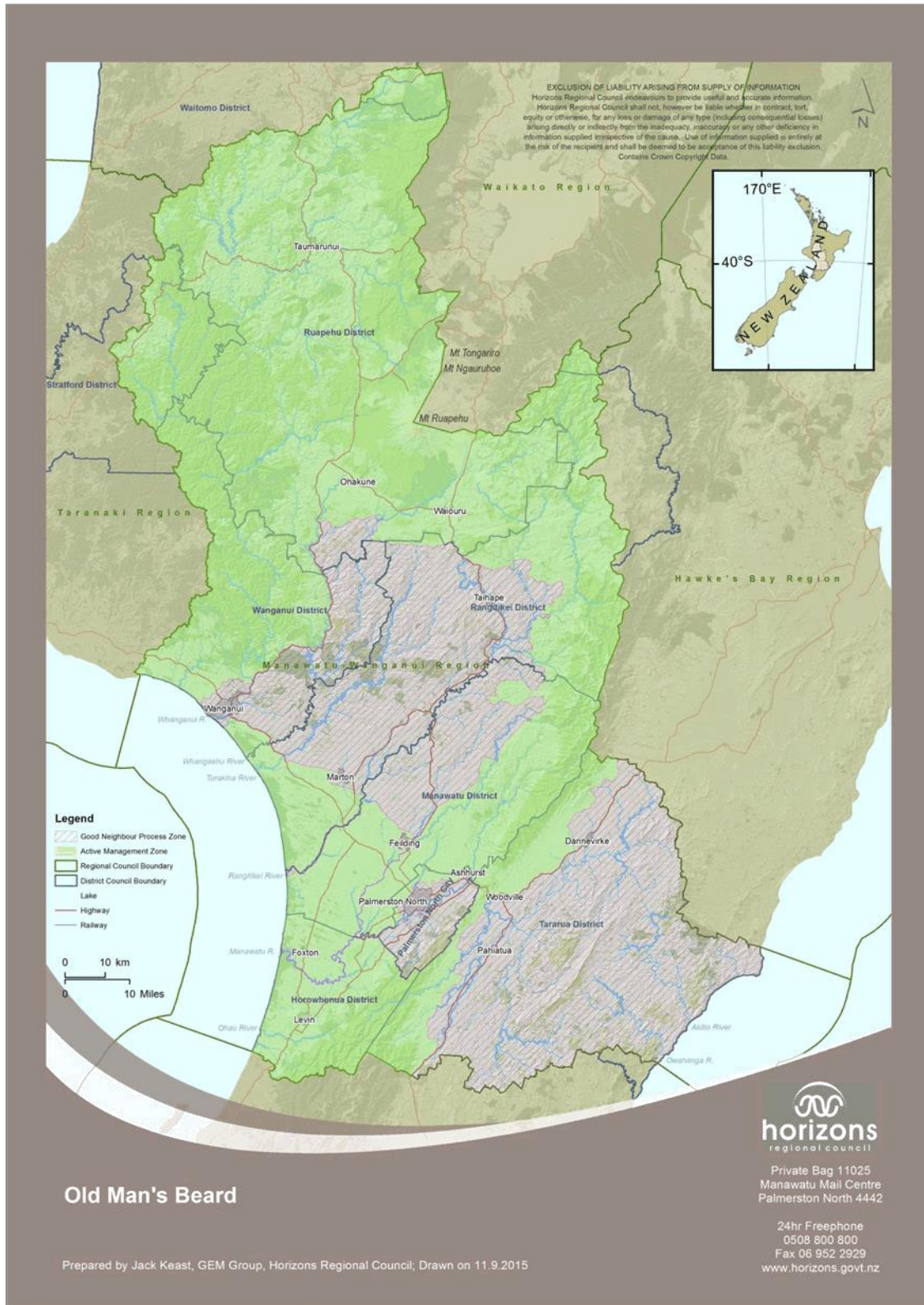
Map 5-6: Evergreen buckthorn Active Management and Good Neighbour Process Zones



Map 5-7: Grey willow Active Management and Good Neighbour Process Zones



Map 5-8: Moth plant Active Management and Good Neighbour Process Zones



Map 5-9: Old man's beard Active Management and Good Neighbour Process Zones

5.7.3. Aquatic Pest Plants

Eelgrass, *Egeria*, hornwort, *Lagarosiphon*, and reed sweetgrass are grouped into the “Aquatic Pest Plants” on the basis that they are aquatic pests managed the same way for the same objectives. Their distributions cannot be mapped with any certainty at present. The Plan is more appropriate than relying on voluntary action because the main vector of these plants is intentional or inadvertent human induced spread. Managing behaviour through rules is a useful means for managing spread of these pests to lakes and waterways. The geographic area that the Plan applies to for Aquatic Pest Plants is the whole Region.

Management Regime

Table 5-15: Management regime for Progressive Containment aquatic pest plants

Management regime for Progressive Containment aquatic pest plants	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037), progressively contain or reduce the number of sites across the Region affected by eelgrass, egeria, hornwort, lagarosiphon and reed sweetgrass to prevent further spread and reduce adverse effects on the environment.</p> <p>AIM</p> <p>Within the first ten year period to 2017 (and beyond):</p> <ul style="list-style-type: none"> To reduce the risk of the dispersal of aquatic pest plant species into lakes known to be clear of them within the 10 year period to 2027 and beyond. To reduce infestation of eelgrass, egeria, hornwort, lagarosiphon and reed sweetgrass at boat access, fishing, and swimming areas within the 10 year period to 2027 (where resources are available). To control new incursions of eelgrass, egeria, hornwort, lagarosiphon and reed sweetgrass within the 10 year period to 2027 and beyond, (where resources are available). 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Collaboration between Horizons and other agencies will be pursued.</p> <p>Horizons may undertake to release biocontrol agents for these pests where they are available and release is appropriate.</p> <p>Council inspection</p> <p>Horizons’ may undertake surveillance programmes for areas vulnerable to invasion by these aquatic pest plant species. In the occurrence of a newly discovered infestation, an assessment of the feasibility of control will be made. Where justified and practicable, new incursions will be controlled.</p> <p>Where new incursions are discovered attempts will be made to trace and confirm vectors. Where feasible, management of these incursions and vectors will be implemented.</p> <p>Advocacy and education</p> <p>Advocacy will be a fundamental component of this programme and is closely intertwined with the implementation of dispersal pathway management. All awareness campaigns will be consistent with the National Freshwater Pest Campaign, or any subsequent national awareness campaign. Advocacy initiatives can include, but are not restricted to:</p> <ul style="list-style-type: none"> working with contractors to promote an ethic of responsible work practices and advocating for machine hygiene; continuing to work internally (e.g. with Operations Group) to ensure continuation of sustainable drain management practices and other such initiatives; targeting fishing groups (e.g. coarse fishers, eel fishers etc.) and increasing the awareness of the need for fishing gear hygiene; liaising with managers and owners of properties with infestations to facilitate coordinated management of infestations and dispersal avenues; broader awareness programmes targeted at other lake user groups (i.e. the wider public); providing advice and information on these species to occupiers and other interested parties. <p>Requirement to act</p> <p>Occupiers and the general public will act in accordance with the Act and the rules for containment aquatic plants detailed in Table 5-16. This will prevent the accidental or deliberate spread of these pest species.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons may undertake direct control of localised areas of infestation, or of newly discovered small infestations as and when required.</p> <p>Horizons will oversee dispersal pathway management. Dispersal risk areas will be identified and targeted for management. The importance of interagency collaborations is recognised and such arrangements will be incorporated wherever possible into Horizons initiatives.</p> <p>Such initiatives can include, but are not restricted to:</p> <ul style="list-style-type: none"> erecting signage at both infested and non-infested sites advising of the risk of dispersal via boats, boat trailers, fishing gear, dogs, jet skis etc; erecting signage that advises of ways to implement good hygiene practices; producing flyers and/or pamphlets advising of ways to implement good hygiene practices; localised weed control at public boat access and swimming areas to minimise the risk of transfer. 	<p>OUTCOMES</p> <p>The distribution of eelgrass, egeria, hornwort, lagarosiphon and reed sweetgrass is restricted to current infestations or reduced.</p>
<p>MONITORING</p> <p>Horizons will monitor success by periodically recording the presence or absence of these weeds from the Regions’ lakes.</p> <p>Eelgrass, egeria, hornwort, lagarosiphon, and reed sweetgrass will also be monitored in accordance with Section 6.1 of this Plan.</p>	

Specific Rules

Table 5-16: Specific rules for Progressive Containment aquatic plants

Specific rules for Progressive Containment aquatic plants	
Rule	Explanation
Non-dispersal Rule 5.16.1	No person will distribute, sell, exhibit, propagate or dispose of any eelgrass, hornwort, egeria, lagarosiphon or reed sweetgrass, except at Authorised Landfills or Authorised Green Waste Dump sites, or as authorised by a resource consent pursuant to the RMA.
Note	The pests in this Plan are prohibited from sale, display, distribution or propagation in accordance with Sections 52 and 53 of the Act.
	A breach of these rules will create an offence under Section 154 N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under section 157(5) of the Act.

5.7.4. Other Non-Mapped Progressive Containment Pest Plants

Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass, and yellow ragwort are grouped into the “Other Non-mapped Progressive Containment Pest Plants” on the basis that they are all production pests which are managed under the Plan through using a mix of a clear land rule and a good neighbour rule. These species are widespread but there are parts of the Region that are clear of these pests and it is desirable to keep those areas clear. The clear areas cannot be mapped, hence the name for this group. The Plan is more appropriate than relying on voluntary action because it provides a fair means by which the costs associated with the spread of the pests can be allocated to exacerbators. The Plan requires occupiers with small infestations to make the economically sensible decision to control these pests. The geographic area that the Plan applies to for the Other Non-Mapped Progressive Containment Pest Plants is the whole Region.

Management Regime

Table 5-17: Management regime for the other non-mapped suite of Progressive Containment plants

Management regime for the non-mapped suite of Progressive Containment plants: Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037) to progressively contain or reduce the spread of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort over the entire Region to reduce adverse effects on economic wellbeing.</p> <p>AIMS</p> <p>Within the first ten year period to 2027 (and beyond):</p> <ul style="list-style-type: none"> To reduce the occurrence and spread of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass, and yellow ragwort from infested land to clean land. To investigate and support biocontrol options for these species. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Potential use of Pathway management plans Horizons will investigate the feasibility of managing the spread of these species using pathway management plans.</p> <p>Council inspection Horizons may conduct surveillance for these pests.</p> <p>Advocacy and education Horizons will carry out programmes to increase awareness of the threats posed by these pests.</p> <p>These pests will be incorporated into generic biosecurity advocacy programmes, including information on limiting dispersal of these pests.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery Horizons will encourage and assist occupiers with advice on pest management.</p> <p>Horizons may support the establishment of biocontrol programmes, including sourcing funding, initiating research or coordinating community groups. Where biocontrol agents are already available, Horizons will support initiatives to maintain self-sustaining populations of biocontrol agents throughout the Region, subject to resources.</p> <p>Horizons may undertake to release biocontrol agents for these pests where they are available and release is appropriate.</p>	<p>Requirement to act The responsibility for the control of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort lies with the occupier.</p> <p>Occupiers must act in accordance with the Act and the rules detailed in <i>Table 5-18</i>.</p> <p>All Occupiers will be bound as a neighbour for the control of these pests, in accordance with the good neighbour rule process outlined in <i>Section 4.7</i> of this Plan and the good neighbour rule detailed in <i>Table 5-18</i>.</p> <p>These rules will ensure the management of smaller infestations by Occupiers (keeping clear land clear), while placing the onus of reducing the spread of the pests into Occupiers which have large infestations of pests who are neighbours of Affected Owners.</p>

Management regime for the unmapped suite of Progressive Containment plants: Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort	
<p>MONITORING</p> <p>Horizons will monitor the success of the previous pest control event by recording the extent and/or density of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort in areas where the pest has been controlled by Horizons.</p> <p>Sites will be monitored annually for a further five years after zero-levels have been achieved.</p> <p>Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort will also be monitored in accordance with Section 6.1 of this Plan.</p>	<p>OUTCOMES</p> <p>Native ecosystems, riparian habitats and soil conservation retirement blocks are protected from the adverse effects of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort.</p> <p>Water quality is protected from excessive nitrate loadings that may be attributed to gorse and broom.</p> <p>Areas that are clear of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort remain clear of these species.</p> <p>The spread of Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort will be reduced.</p>

Specific Rules

Table 5-18: Specific rules for other non-mapped Progressive Containment plants

Specific rules for other non-mapped Progressive Containment plants	
Rule	Explanation
Clear Land Rule 5.19.1	All Occupiers of a place greater than 4 hectares where Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort is present within the 'Threshold Infestation Size' specified in Table 5-10 for these pests, must destroy that pest within 21 calendar days of the discovery of the pest(s) (or within a time period as negotiated with an Authorised Person) in the place they occupy.
Good Neighbour Rule 5.19.2	All Occupiers of a place greater than 4 hectares must destroy any Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass or yellow ragwort in the place(s) they occupy within the 'nominal distance for management of the boundary' specified in Table 5-10 for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier, within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the place they occupy.
A breach of these rules will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.	

5.8. Sustained Control Programme

Horizons' Sustained Control Programme covers species which Horizons seeks to control to levels where their impacts on economic values and/or environmental values are cost-effectively reduced (i.e. that the cost of control is less than the opportunity costs that arise if these pests go unmanaged). These pests are widespread and throughout Manawatu-Wanganui Region.

Table 5-19: Organisms on Horizons' Sustained Control Programme

Species	Description	Effect
Possum (pg. 59)	An Australian marsupial originally introduced to create a fur trade. Adults range in size from 2-5 kg, possums have a rounded build, grey to black or orange-black fur, and a prehensile tail. They eat a large range of plants including trees, crops, gardens and pasture. They are also known to eat native insects and prey on native birds and their eggs. They are considered the number one animal pest in the Region because of their adaptability to different environments, and the extent and severity of damage they cause to both production and environmental values. Concerted effort by a number of agencies, including Horizons, has driven populations to low levels over much of the Region. The population will rapidly re-expand if left un-managed. Populations are very destructive to indigenous ecosystems – from localised extinctions of possum-preferred species, to forest canopy dieback and ecosystem change. Vectors for a number of pathogens – the best known being bovine tuberculosis (Tb), but also <i>Giardia</i> , <i>Cryptosporidium</i> , and <i>Leptospira</i> .	Production Pest, Environmental Pest and Social/Amenity Pest
Rabbit (feral) (p. 61)	An herbivorous mammal of 1-2 kg with a rounded body, long ears and a small tail. The fur colour is mainly buff, sprinkled with black, a reddish neck and white belly, or black. Breeding occurs throughout the year, with adult females capable of producing 45 to 50 young per year. Habitation is of forest margins, shrub lands and tall pasture habitats on most soil types, but they prefer short pasture on light, free-draining soils. Historically, feral rabbits have been a significant problem for farming in parts of the Region. At high infestation levels they can significantly damage new plantings of trees and crops, reduce the amount of palatable pasture, increase the amount of bare ground susceptible to erosion and pest plant invasion, and initiate erosion processes by burrowing. In indigenous habitats they can reduce vegetation species diversity by replacing vegetation dominated by perennial species with vegetation dominated by annuals, and replacing grasslands and shrub land with low, herbaceous and mat-forming vegetation. Even small populations can be a nuisance to bush remnant restoration programmes where they affect the re-establishment of the forest understorey and damage soil conservation, forestry and other new tree plantings. They can also be a local nuisance in urban and peri-urban areas, where small populations do a lot of damage to vegetable gardens, trees and nurseries.	Production, Environmental and Social/Amenity Pest

The page numbers quoted refer to the page on which the management regime for each species can be found.

Reason for Inclusion

The pests on the Sustained Control Programme are classed as production, environmental and social/amenity pests because they are capable of causing adverse effects on the productive capacity of the Region, affect biodiversity values, or ruin recreational spaces as indicated in the Description and by the effect of each of the pests in Table 5-19. It is considered more appropriate to include possums and feral rabbits in the Sustained Control Programme of the Plan than to rely on voluntary action as outlined in the preamble for each species or group of species below.

5.8.1. Possum

Possoms are widespread but suppression of their populations can achieve cost effective gains in pastoral productivity and provides a level of protection from possum browse effects on indigenous habitats. To achieve region-wide benefits requires coordination of action at regional scale. With the anticipated withdrawal of OSPRI's Bovine TB vector management, there will be reduced levels of government funding for possum control. There is a risk that the levels of service for possum control will drop, creating a potentially greater risk of recurrence of the diseases possums can transmit if control in those areas does not continue. The benefits of possum control therefore accrue to a wider community than those directly affected by the presence of the possums on their property. The Plan is more appropriate than relying on voluntary action because controlling the effects of possums will have a mix of public and private benefits and the cost of achieving the public benefit of the control of this pest on private lands is shared. The geographic area that the Plan applies to under this Programme is the area depicted as the Possum Management Area depicted on Map 5-10. Horizons PCO

programme is as depicted in Horizons' Regional Pest Animal Management Operational Plan for the current year 1 July to 30 June.

Management Regime

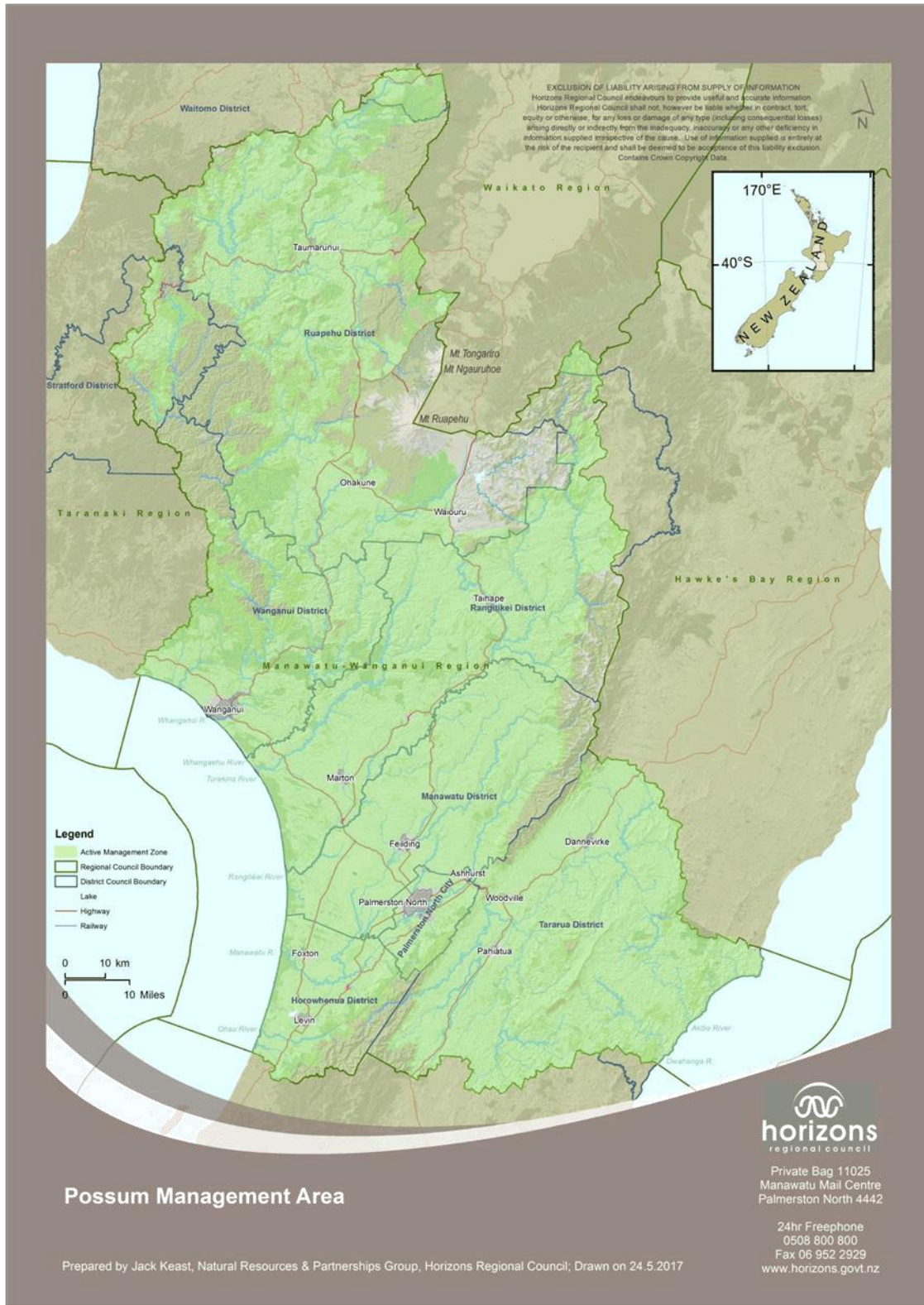
Table 5-20: Management regime for Sustained Control of the possum

Management regime for Sustained Control of the possum	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017-2037) control possums across the Region to reduce adverse effects on economic wellbeing and the environment.</p> <p>AIMS</p> <ul style="list-style-type: none"> On average, the rateable land managed by Horizons as part of Horizons' Possum Control Operation (PCO) programme, maintains possum numbers below 10% residual trap catch (or equivalent measure) within the first ten years until 2027 and beyond. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Council inspection</p> <p>Horizons will conduct a surveillance monitoring programme for possums.</p> <p>Advocacy and education</p> <p>Horizons will carry out programmes to increase public awareness of the roles and responsibilities of occupiers and the threats posed by possums. Horizons will seek to integrate possum control work with Crown Agencies where their land is contained inside, or adjacent to, a possum control operation.</p> <p>The possum will be incorporated into generic biosecurity advocacy programmes, including information on limiting dispersal of these pests.</p> <p>Requirement to act</p> <p>All Occupiers must act in accordance with the Good Neighbour Rule process outlined in Section 4.7 and the good neighbour rule detailed in Table 5-21. This will ensure that the onus of reducing the spread of possums is shared by the neighbours of Affected Occupiers.</p> <p>Research</p> <p>Horizons will investigate how to approach the OSPRI withdrawal.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons will provide ongoing service delivery possum control in areas identified as part of Horizons' PCO programme to ensure that operational targets are achieved.</p> <p>Horizons will continue to work closely with OSPRI to ensure that, as OSPRI ceases possum control in specific areas, Horizons can be in a position to assume those areas into Horizons' PCO programme if resourcing is available.</p>	<p>OUTCOMES</p> <p>In areas of Horizons possum control programme damage to amenities, forestry, soil conservation planting, crops, horticulture, pasture production and native flora and fauna and risk of disease transmission from possums to livestock, pets and humans is limited to the levels provided by the maintenance of possums below 10% residual trap catch (or equivalent measure).</p>
<p>MONITORING</p> <p>Horizons will monitor possum density trends in Horizons-managed PCOs by 30 June every year, using standard industry protocols and best practice guidelines. Monitoring will also be in accordance with Section 6.1 of this Plan.</p> <p>Horizons will audit the quality of possum control inputs for alignment with industry and Horizons' best practice for Horizons' PCOs on an annual basis, by 30 June.</p>	

Specific Rules

Table 5-21: Specific rules for the possum

Specific rules for the possum	
Rule	Explanation
<p>Good Neighbour Rule 5.22.1</p>	<p>All occupiers of:</p> <ul style="list-style-type: none"> Non-rateable land adjacent or within the Possum Management Area; or Rateable land to which a Horizons Possum Control Operation has been denied access; <p>Must ensure that possum density is maintained, on average, below 10% Residual Trap Catch (or equivalent measure of possum abundance) on the land they occupy within 200m of the boundary of an Affected Occupier, or have an Approved Management Plan in place to manage the spread of possums, where the Affected Occupier is undertaking Reasonable Measures to control possums on the land that they occupy. Reasonable measures include the land being subject to a current Horizons Possum Control Operation.</p>
	<p>A breach of this rule will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.</p>



Map 5-10: Possum Management Area

5.8.2. Rabbit (feral)

Rabbits are widespread and can usually be effectively managed under voluntary action. However, it is appropriate that Horizons be involved in regulating these pests when voluntary action does not effectively manage the spread of large populations of rabbits from neighbours who are not controlling them. The Plan is also more appropriate than relying on voluntary action to ensure that the effects of rabbits do not become so great that it is beyond the capacity of private interests to manage them. The thresholds in the Plan are set to manage rabbits below this level. Further to this, the use and release of biocontrols requires region-wide coordination. The Plan includes the control of populations of rabbits of any origin that are no longer kept in domestic circumstances (i.e. feral). The Plan does not include the management of individual escapee domestic or pet rabbits that would otherwise, when recaptured, be kept within a fence or enclosure for domestic or farming purposes. The geographic area that the Plan applies to for rabbits is the whole Region.

Management Regime

Table 5-22: Management regime for Sustained Control of feral rabbits

Management regime for Sustained Control of feral rabbits	
<p>OBJECTIVES</p> <p>Over the duration of the Plan (2017 – 2037) control feral rabbits across the Region to reduce adverse effects on economic wellbeing and the environment, including enjoyment of the natural environment.</p> <p>AIMS</p> <ul style="list-style-type: none"> Feral rabbit populations in rural areas to be kept below a level acceptable for reducing production damage for the 10 years to 2027 and beyond. 	<p>PRINCIPAL MEASURES (Continued)</p> <p>Horizons may provide user-pays pest control services to individual landowners and self-help groups upon request or by negotiation. Costs will be calculated and recovered on a case by case basis.</p> <p>Council inspection</p> <p>Where rabbit numbers are reported of being above Modified McLean Scale level 5, Horizons will conduct specific inspections to determine compliance with the rule.</p> <p>Advocacy and education</p> <p>Horizons will carry out programmes to increase awareness of the roles and responsibilities of occupiers programme and the threats posed by rabbits. The feral rabbit will be incorporated into generic biosecurity advocacy programmes, including information on limiting dispersal of these pests.</p> <p>Requirement to act</p> <p>All Occupiers must act in accordance with the good neighbour process outlined in <i>Section 4.7</i> and the good neighbour rule detailed in <i>Table 5-23</i>. This will ensure that the onus of reducing the spread of rabbits is shared by the neighbours of Affected Occupiers.</p>
<p>PRINCIPAL MEASURES</p> <p>Service delivery</p> <p>Horizons will strategically release biocontrol agents such as rabbit calici virus, in accordance with industry-agreed best practice guidelines.</p> <p>Horizons may provide service delivery in selected sites valued for biological diversity or soil conservation where it is deemed rabbits are a threat to environmental values.</p> <p>Horizons may conduct control operations on small populations of rabbits, or provide tools for rabbit control, in urban or peri-urban situations where control by occupiers would otherwise be difficult.</p> <p>Horizons may assist land occupiers and self-help groups to develop coordinated pest control programmes in areas where a pest problem is identified and coordinated control would be the most efficient means of addressing the problem.</p>	<p>OUTCOMES</p> <p>Severe pastoral losses and soil damage caused by rabbit population explosions are avoided.</p> <p>Any unreasonable costs imposed by a neighbour who is not controlling feral rabbits are avoided.</p>
<p>MONITORING</p> <p>Horizons will undertake periodic monitoring to establish regional trends in the feral rabbit population, and will report results in the annual monitoring report by November of the year the data is collected.</p> <p>Horizons will assay populations every third year for regional trends in rabbit haemorrhagic disease (RHD) virus immunity, in accordance with industry protocols, and will report results in the annual report by November of the year the data are collected.</p> <p>Monitoring and reporting will also be in accordance with <i>Section 6.1</i> of this Plan.</p>	

Specific Rules

Table 5-23: Specific rules for feral rabbits

Specific rule for feral rabbits	
Rule	Explanation
Good Neighbour Rule 5.24.1	Upon the discovery of rabbits at level 5 (or higher) of the Modified McLean Scale (<i>Table 5-24</i>), all Occupiers must destroy feral rabbits located in the place(s) they occupy so as to maintain populations below level 5 of the Modified McLean Scale within 200m of their boundary, or have an Approved Management Plan to manage the spread of rabbits, with respect to the boundary with an Affected Occupier, within 21 calendar days of discovery (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy rabbits in the place they occupy.
	A breach of this rule will create an offence under Section 154N(19) of the Act. Any person or corporation who fails to comply with this rule is liable to penalties as prescribed under Section 157(5) of the Act.

The Modified McLean Scale

Table 5-24: The Modified McLean Scale of Rabbit Infestation (NPCA 2012)

Level	Description
1	No sign found. No rabbits seen.
2	Very infrequent sign present. Unlikely to see rabbits.
3	Pellet heaps spaced 10m or more apart on average. Odd rabbits seen; sign and some pellet heaps showing up.
4	Pellet heaps spaced between 5m and 10m apart on average. Pockets of rabbits; sign and fresh burrows very noticeable.
5	Pellet heaps spaced 5m or less apart on average. Infestation spreading out from heavy pockets.
6	Sign very frequent with pellet heaps often less than 5m apart over the whole area. Rabbits may be seen over the whole area.
7	Sign very frequent with 2-3 pellet heaps often less than 5m apart over the whole area. Rabbits may be seen in large numbers over the whole area.
8	Sign very frequent with 3 or more pellet heaps often less than 5m apart over the whole area. Rabbits likely to be seen in large numbers over the whole area.

6. Monitoring

6.1. Measuring the extent to which the objectives are being achieved

Monitoring provides a measure of how effective work conducted under this Plan has been. It highlights areas of success and areas where improvements are required. Robust spreadsheets and databases will be utilised to capture and store data collected during the monitoring of this Plan. Data collected in the field will be entered regularly so that the Plan can be reported on in an accurate way at any time.

There are three areas of monitoring required in order to report on the success of the pest management programmes. They are:

1. Establish whether, and to what degree, occupiers, plant nurseries, plant and pet retail outlets, stakeholders and members of the public are complying with the Plan, i.e. compliance monitoring.
 - Horizons will periodically inspect plant nurseries, pet shops and retail outlets (including aquatic pet shops) in the Region to ensure no pest plants or pest animals are being propagated, sold or offered for sale. Inspections will search for pests banned from sale, distribution and propagation under this Plan and the National Pest Plant Accord list. Availability of pests for purchase will be noted. Site visits are to be recorded and comments made on outcomes and actions taken where required.
 - After Horizons receives a complaint regarding a pest, properties may be inspected for pest infestations. All complaints will be logged in a complaints register and inspections recorded. The process, outcome and Horizons' response will also be recorded.
 - Roading and rail authorities will undertake surveillance monitoring of all roadside and rail verges for pest plant infestations at least once a year. The results and actions taken will be reported as part of the annual report to Horizons, as required by this Plan.
2. Establish the mortality rate and effectiveness of control techniques. Determine to what degree the objectives are being met, i.e. success monitoring.
 - All direct control work conducted by Horizons will be logged, citing control techniques employed. Follow-up visits and any further control work will also be logged.
 - Success rates will be recorded and entered into Horizons' database.
 - Biological control agents will be periodically surveyed, and levels and distribution of biocontrol agents will be recorded and/or mapped.
 - Where Memoranda of Understanding exist between Horizons and other agencies, the parties will meet periodically to discuss the work programme. Work conducted by Horizons under such arrangements will be monitored in the same manner as other work conducted by Horizons under this Plan. Other parties may be requested to provide monitoring of any control work they may have conducted independent of Horizons' control work.
 - Prior to and following control, infestation size and, where appropriate, density or an index of density will be recorded. This data will be entered into Horizons' database to enable comparisons to be drawn between pre- and post-control.
 - Maps will be produced annually for each species, indicating areas of work and known infestation levels.

- Control work events and result data will be checked against the timeframes associated with each objective.
 - The monitoring methodology will be reviewed as required to ensure that information on infestation size, density and location is logically and consistently collected across the Region in a manner which is as comprehensive as required while remaining simple to apply.
3. Establish the extent to which the objectives are being achieved, i.e. outcome monitoring.
- For exclusion and eradication pest programmes, the outcome measure is the continued absence of the pest from the Region as it may be assumed that the result is protection of production and environmental values. This may be achieved by under taking either:
 - Active monitoring, i.e. undertaking surveillance of areas vulnerable to invasion; or
 - Passive monitoring, i.e. investigating reports from occupiers or the public on the presence of the pests.
 - For the Progressive Containment Pest Programme, the outcome measure is the degree of reduction of the area of these pests inside the active management zones and/or the continued zero level status of the pest inside the active management zones, as it may be assumed that the result is protection of production and environmental values.
 - For sustained control pests, the outcome measure is the speed at which boundary complaints are responded to and resolved.
 - Investigate with key Māori stakeholders the provision for cultural monitoring to assess the effectiveness of pest control operations where there is a likelihood of non-target impacts on taonga species.

6.2. Monitoring management agency performance

Horizons will report annually, by November, on work conducted over the previous financial year to achieve the objectives of the Plan. Reporting will include (but is not restricted to) the following performance measures:

- The results of inputs, outputs and outcomes monitoring as detailed in *Section 6.1* above. Reasons for changes in pest population or infestation number, size or density (positive or negative) will be explained;
- The results of outcomes and outputs monitoring as detailed in any programmes to identify and control new incursions;
- The change (positive or negative) in the extent of biocontrol agents and suggested reasons for the change.
- The results of trials;
- An evaluation of work programmes, including review of the operational plan and, if necessary amendment;
- Reporting on education initiatives with a statement on the perceived success of these, and guidance on the direction of future education work; and
- An overview of community initiatives including extent of work, methods and results.

6.3. Review of the Plan

Monitoring the effects of the Plan will ensure that it is continuing to achieve its purpose and that relevant circumstances have not changed to such a significant extent that a review of the Plan is required. A review of the Plan may be needed if:

- (a) There are changes to the Act and a review is needed to ensure that the Plan is not inconsistent with it;
- (b) Other harmful organisms create problems, or have the potential to create problems, that can be resolved through integrating them into the Plan;
- (c) Monitoring shows a significant change in the problems posed by pests or other organisms to be controlled covered by the Plan; or
- (d) Circumstances change to such a significant extent that Horizons assesses that a review would be appropriate.

Failing the need to review the Plan under any of the above circumstances, the Plan will be reviewed in accordance with Section 100D of the Act. The next planned review will begin in 2027. Such a review may extend, amend or revoke the Plan; or leave it unchanged.

Part Three: Procedures

7. Powers conferred

Manawatu-Wanganui Regional Council will use the statutory powers of Part 6 of the Act as shown in *Table 7-1* together with any other powers and regulations from the Act, so as to achieve the purpose and objectives of the Plan.

The Principal Officer (Chief Executive) of Manawatu-Wanganui Regional Council may appoint authorised persons for the purpose of exercising functions, powers and duties under the Act in relation to a regional pest management plan. Most of these functions, powers and duties relate to implementation of the Plan.

When carrying out his or her duties, an Authorised Person will be limited to using those powers specified in his or her instruments of appointment and within the constraints imposed by Section 7 of the Act with respect to provisions of certain other Acts. The powers specified within any instrument of appointment are based upon the powers identified in *Table 7-1* and reflect the officer's experience, technical competence and qualifications relevant to his or her responsibilities.

Table 7-1: Powers from Part 6 to be used

Administrative provisions	Biosecurity Act Reference
The appointment of authorised and accredited persons	Sections 103(3) (7)
Delegation to authorised persons	Section 105
Power to require assistance	Section 106
Powers of inspection	Sections 109 and 110
Entry in respect of offences	Section 111
Duties on exercising power of entry	Section 112
Power to record information	Section 113
General powers	Section 114
Application of articles or substances from aircraft	Section 114A
Use of dogs and devices	Section 115
Power to seize evidence	Section 118
Power to seize abandoned goods	Section 119
Power to intercept risk goods	Section 120
Power to examine organisms	Section 121
Power to apply article of substance to a place	Section 121A
Power to give directions	Section 122
Power to vaccinate	Section 123
Power to act on default	Section 128
Liens	Section 129
Declaration of restricted place	Section 130
Declaration of controlled areas	Section 131
Power to revoke	Section 133
Options for cost recovery	Section 135
Failure to pay	Section 136

Note: The procedures that are followed in the event of occupiers or other persons not complying with the rules or other general duties are set out in Section 7.1 below.

In addition, the Manawatu-Wanganui Regional Council has the power to prosecute where an offence has been committed under Section 154N (19) of the Act which is as follows: "A person commits an offence against this Act

who fails to comply with a rule in a regional pest management plan or a regional pathway management plan that specifies that a contravention of the rule creates an offence against this Act. It is specified for every rule or set of rules in Part 2 (Pest Management) of this Plan, that a contravention of the rule or rules, creates an offence under Section 154N(19) of the Act.

7.1. Regulatory action

Horizons is committed to working with land owners to address pest problems through implementation of the Plan. Equally, there will be times when the provisions of the Plan are not being complied with, and the enforcement provisions of the Act will be relied on by Horizons to ensure the integrity, purpose and objectives of the Plan are given effect to.

7.1.1. Failure to comply with a rule

In the event that an occupier fails to comply with any requirement in any rule included in Part Two of the Plan, an authorised person will:

- (a) Advise that occupier of their non-compliance and direct them to take remedial actions; and
- (b) Follow up to confirm what remedial action has been taken and/or identify outstanding requirements;
- (c) Take any further action Horizons considers appropriate in accordance with the Act.

In circumstances of continued non-compliance, the 'general powers' under Section 114 of the Act may be used by an authorised person to eradicate or manage a pest on the place or prevent the spread of a pest from or to the place; and/or the administrative and enforcement provisions of the Act, may be invoked.

7.1.2. Failure to Comply with a Notice of Direction

Where a Notice of Direction has been given to an occupier under Section 122 of the Act, and the occupier has not complied with the requirements of the direction within the time specified, then under Section 128 of the Act, Horizons may enter onto the land and implement the Notice of Direction in a way that is reasonably necessary and appropriate to achieve its purpose.

7.1.3. Offences

Horizons will, in appropriate cases, prosecute persons who fail to comply with any requirement under the Plan, including where a person fails to act on directions or requirements issued by authorised persons to give effect to this Plan.

7.1.4. Recovery of Costs Incurred

Under Section 135 of the Act, Horizons may recover the costs and expenses reasonably incurred by it in carrying out the works and measures as a debt due from the occupier to whom the Notice of Direction was given.

7.1.5. Provision for Exemption

Horizons may, upon the written request of an occupier, exempt any person from any requirement in any rule included in Part Two of this Plan. Before granting an exemption under Section 78 of the Act, Horizons must be satisfied that the exemption will not significantly prejudice the attainment of the Plan's objectives, and further that one or more of the following applies:

- (a) The requirements have been substantially complied with and that further compliance is unnecessary; or

- (b) The action taken or provision made in respect of the matter to which the requirement relates is as effective as or more effective than actual compliance with the requirement; or
- (c) The prescribed requirements are clearly unreasonable or inappropriate in the particular case; and
- (d) Events have occurred that make the prescribed requirements unreasonable or inappropriate in the particular case.

Process

On receipt of any request, Horizons will advise that person within ten (10) working days of the decision whether or not to exempt that person from any requirements of any plan rule included in Part Two of this Plan. In making this decision and considering whether or not Section 78 of the Act applies (as set out above), regard will be given to:

- (a) Positive soil conservation effects of pest plants in erosion prone sites;
- (b) Regeneration of indigenous habitat;
- (c) Prevention or mitigation of flood damage;
- (d) Effective suppression of the pest through alternative management methods;
- (e) The pest being used for valid scientific research;
- (f) The pest being used for approved herbal, medicinal, or commercial extractive or consumptive use; or
- (g) Where two occupiers with a common boundary agree that control of the pest using good neighbour rules is not necessary or is better managed through non-regulatory means.

Applications for exemption shall state the reason(s) why the exemption is being sought. In addition to setting out how the provisions of Section 78 have been met, the application should suggest conditions that might be imposed or alternative actions that might be undertaken that would result in meeting the objectives of the Plan.

Exemptions are considered on a case by case basis, so there are no fixed criteria other than those outlined above. Where an exemption is granted, any conditions that need to be met will be identified in writing. Conditions may relate to, without limitation, measures to be taken to ensure achievement of the Plan's objectives, position of monitoring requirements and recovery of costs, including bonds to ensure performance.

The exemption will also record the reason why the exemption was granted under the Act, and a timeframe for review and expiry.

A register of exemptions will be maintained for public inspection at Horizons.

8. Funding

Section 70 of the Act requires funding of the Plan to be addressed. For the purpose of identifying the most appropriate funding regime, the matters to be addressed as set out in the Act include:

- An analysis of the benefits and costs of the Plan and the cost of any reasonable alternative measures;

- The extent to which any person or persons of any class, kind or description are likely to benefit from the Plan (beneficiaries);
- The extent (if any) to which any persons or persons of any class, kind or description by their activities or inaction contribute to the creation, continuance or exacerbation of the problems proposed to be resolved by the Plan (exacerbators);
- The rationale for the allocation of costs; and
- Whether any unusual administrative problems or costs are expected in recovering the costs allocated to any of the persons who are required to pay.

8.1. Analysis of benefits and costs

The Act, and NPD, require an analysis of benefits and costs (ABC) as part of the development or review of a regional Pest Management Plan. The ABC analysis is provided in the supporting document *Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: Analysis of benefits and costs following the National Policy Direction for Pest Management Section 6(2-4)* which is publically available on Horizons' website.

This report, which should be read in conjunction with the Plan, follows the NPD and guidance provided by MPI in the document called *Meeting the requirements of the National Policy Direction for Pest Management 2015* (Version 1.0) (MPI, 2015). The ABC analysis examines the assumptions on the costs imposed by the rules and actions posed in the Plan and finds that the benefits of the Plan (including these rules) outweigh the costs. Each section of the ABC report is led by the name of the pest or group of pests, as featured in Plan.

8.2. Beneficiaries and exacerbators

Beneficiaries are people, institutions or activities that, under the Plan, will experience lower costs, higher production or the benefits of a healthier natural environment. Beneficiaries include the "Regional Community" who benefit from non-financial gains from pest control such as protection of biodiversity, soil, recreational, and water quality values.

Exacerbators are people, institutions or activities that, through their actions (or non-actions), contribute to the creation, continuance or worsening of a pest problem. Exacerbators may include public entities such as Crown agencies, Horizons, TLAs or private individuals or companies.

The underlying rationale for identifying beneficiaries and exacerbators is that they are expected to share the cost of implementing the Plan. By identifying the beneficiaries and exacerbators, an equitable funding policy can be formed for each pest. This is an expectation set out in Section 7 of the NPD. This analysis is provided in the supporting document *Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: Allocation of costs following the National Policy Direction for Pest Management (Section 7)*, which is publically available on Horizons' website.

This report, which should be read in conjunction with the Plan, follows the NPD and guidance provided by MPI in the document called *Meeting the requirements of the National Policy Direction for Pest Management 2015* (Version 1.0) (MPI, 2015). Each section of the report is led by the name of the pest or group of pests, as featured in the Plan. The report lists the beneficiaries and exacerbators for each group, and gives the rationale for the allocation of costs across excaerbators and beneficiaries.

8.3. Funding sources and rationale

In giving effect to funding, both the Act and the Local Government (Rating) Act 2002 require that funding should be sought from:

- Those people who have an interest in the Plan;
- Those who benefit from the Plan;
- Those who contribute to the pest problem; and
- In a way which reflects economic efficiency, equity and the ability to target those funding the Plan and the costs of collecting the funding.

Information on the allocation of costs of the Plan is provided in the supporting document *Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: Allocation of costs following the National Policy Direction for Pest Management (Section 7)*, which is publically available on Horizons' website.

This report, which should be read in conjunction with the Plan, follows the NPD and guidance provided by MPI in the document called *Meeting the requirements of the National Policy Direction for Pest Management 2015 (Version 1.0)* (MPI, 2015). Each section of the report is led by the name of the pest or group of pests, as featured in the Plan. The report gives the specific rationale for the allocation of costs across exacerbators and beneficiaries, including the use of general and targeted rates as a means to share the cost with exacerbators and beneficiaries.

8.4. Anticipated implementation costs

The LTP details the prospective funding impact for the Biosecurity Activity projected over the 10-year life of the LTP (LTP pg. 228) and gives a reasonable estimate of the cost of the delivery of the Plan over time, for any given year. The 2017-2018 costs are represented in *Table 8-1* and exclude GST. The annual operational budget for the Plan is revised every year as part of Horizons Annual Plan setting process (a public process).

Table 8-1: 2017-2018 funding impact statement per Horizons 2015-2025 Long-term Plan (LTP pg. 228)

Activity (by rating type)	Income (\$000s)
Biosecurity general including Environmental and Amenity pests (all EQCVs and general UACs)	3,010
Production pest animals excluding rooks (targeted per ha)	1,420
Rooks (targeted per ha)	129
Production pest plants (targeted per ha)	122
Production pest plants (targeted UAC)	20

8.5. Funding limitations

There are no unusual administrative problems or administrative costs expected in recovering the funding from those required to pay. The Act provides Horizons with powers to recover costs for a particular function or service under Section 135 of the Act. For revenues that are identified as targeted rates, the rating mechanism imposes the limitation that the funds can only be used for the pest control activities that the rates are attributed to. Funding of Exclusion pests and Aquatic Pest Plants programmes is primarily on surveillance and advocacy. The ability to successfully manage large incursions of these pests may be limited by the funding available at the time the incursion is detected.

9. Glossary

Terms marked with an asterisk (*) are defined in the Biosecurity Act 1993.

Term	Description
Active Management Zone	The defined area within the Region where a particular pest is to be eradicated or controlled to zero levels. Active Management Zones apply to species managed under a Progressive Containment objective.
Affected Occupier	The occupier of land adjacent to or nearby to land that is infested by a pest which is spreading beyond the boundaries of that property resulting in, or increasing infestations of the pest onto adjacent or nearby land. Where the occupiers' land is not adjacent to the infested land it must be within the 'nominal distance for managed boundary' set out in <i>Table 5-10</i> for pest plants, or within 200 m for possums or rabbits, of the infested land, for them to be an Affected Occupier.
Animal	Means any mammal, insect, bird or fish, including invertebrates, and any living organism except a plant or human.
Appropriate	Means determined to be appropriate by the Council or its officers to be proper and suitable after the consideration of relevant factors.
Approved Management Plan	A documented pest management plan that describes the levels of service for management of the pest in the place they occupy, by the agency required to have such a plan, that the Principal Officer or their delegate is satisfied will meet the objectives for the pest in this Plan.
Authorised Green Waste Dump	Land used for the disposal of green waste in accordance with a resource consent, licence or as otherwise authorised under statute or regulation.
Authorised Landfill	Land used for the disposal of waste in accordance with a resource consent, licence or as otherwise authorised under statute or regulation.
Authorised person*	A person appointed an authorised person under Section 103 of the Act.
Beneficiary	A person or group of people who benefits from the implementation of the Plan.
Biological Control (Biocontrol)	The use of organisms that attack pests without harming other species.
Biological Diversity (Biodiversity)	The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems.
Binomial name	The two-part scientific name given to an animal (i.e. <i>Genus species</i>).
Chief Technical Officer*	A person appointed a chief technical officer under Section 101 of the Act.
Control	To reduce the incidence or severity of a pest to levels where they no longer have a negative effect.
Costs and Benefits*	Costs and benefits of any kind whether monetary or non-monetary.
Crown land	Land vested in the Crown and administered by a Minister; includes all land forming part of any national park, any reserve within the meaning of the Reserves Act 1977, and all unoccupied lands of the Crown.
Destroy	To put out of existence.
Direct control	Means pest control undertaken by or funded by the Manawatu-Wanganui Regional Council – see also service delivery.
Distinctiveness	Refers to unusual or uncommon features, species or populations in a given location.
District Council	A district council constituted under Part 1A of the Local Government Act 2002.
Ecological context	The connectivity of a given site with the surrounding landscape and ecological processes.
Ecosystem	A defined community of all plants, animals and micro-organisms, the physical and climatic environment and the interactions and processes between them.
Effect*	Includes any positive or adverse effect, temporary or permanent effect, past, present or future effect, cumulative effect which arises over time or in combination with other effects – regardless of the scale, intensity, duration or frequency of the effect, potential effect of high probability, potential effect of low probability which has a high potential impact.
Endemic	A species that is indigenous only to New Zealand.
Enforce	To compel observance of the law.
Environment*	Includes: ecosystems and their constituent parts, including people and their communities, all natural and physical resources, amenity values, the aesthetic, cultural, economic and social conditions that affect or are affected by any of the above.
Eradication pest programme	Means those pests that are to be managed under an eradication programme. Eradication pest plants are of limited distribution or density in the region or part of the region, for which the eventual goal is eradication at known sites in the region.
Exacerbator	A person who, by their actions or inaction, contributes to the creation, continuance, or exacerbation of a particular pest management problem.
Exclusion pest programme	Where the outcome for the programme is to prevent the establishment of the subject that is present but not yet established in New Zealand or the region.
Exotic	A species, subspecies or lower taxon occurring outside its natural range (past or present) and dispersal potential.

Term	Description
Habitat	The place or type of place where an organism or population normally lives. A description for areas that are similar to each other but different from others.
Good Neighbour Process Zone	For mapped Progressive Containment plant programmes, is the zone of outside the active management zone where occupiers are bound by good neighbour rules.
Hapū	A social, political unit comprised of whanau (extended families) each recognising descent from a common ancestor.
Indigenous	A species, subspecies or lower taxon, occurring within its natural range (past or present) and dispersal potential.
Introduced	A species brought from its natural range to New Zealand by a human agency.
Iwi	A political grouping comprised of several hapū, each recognising descent from a common ancestor(s). The hapū not only recognise genealogical ties but geographical, political and social ties. Today iwi are represented by many organisations, including trust boards, runanga, iwi authorities etc., but only in specific areas where the mandate to do so has been given by the constituent hapū.
Kaitiaki	Spiritual or physical guardian, protector.
Kaitiakitanga	The exercise of guardianship by the tangata whenua of an area in accordance with tikanga Maori in relation to natural and physical resources; and includes the ethic of stewardship.
Karioi Forest	Means the area known as Karioi Forest and included under the following Certificates of Title WN1300/4, WN1300/16 and WN133/17.
Karioi Forest Balance Area	Means the Karioi Forest excluding those areas that fall within the definition of the Karioi Forest Seed Source Area or Karioi Forest Mixed Species Plantation Area.
Karioi Forest Mixed Species Plantation Area	Means the areas within Karioi Forest as identified on Map 5-1, comprising green contorta (<i>Pinus contorta</i> var. <i>contorta</i>) in association with <i>Pinus radiata</i> or <i>Pinus nigra</i> var. <i>laricio</i> .
Karioi Forest Seed Source Area	Means the areas within Karioi Forest comprising, mature stands of green contorta (<i>Pinus contorta</i> var. <i>contorta</i>).
Mauri	Principle of life, life force.
Mustelid	Any member of the genus <i>Mustela</i> – specifically stoats, ferrets/polecats, and weasels.
Natural Area	An area of particular indigenous habitat type that naturally occurs at the given site.
Occupier*	a) in relation to any place physically occupied by any person, means that person; and b) in relation to any other place, means the owner of the place; and c) in relation to any place, includes any agent, employee, or other person, acting or apparently acting in the general management or control of the place.
Organism*	Does not include a human being or a genetic structure derived from a human being, includes a micro-organism, includes a genetic structure that is capable of replicating itself (whether that structure comprises all or only part of an entity, and whether it comprises all or only part of the total genetic structure of an entity). Includes an entity (other than a human being) declared by the Governor General by Order in Council to be an organism for the purposes of the Act. Includes a reproductive cell or developmental stage of an organism. Includes any particle that is a prion.
Palmate	In relation to the antlers of deer – having part of the antler spreading out from a central point like fingers from a hand.
Peri-urban	Properties on the urban fringe, such as life-style blocks, that are managed as rural properties but are constrained by urban rules or norms with regard to shooting, poisoning or trapping animals.
Person*	Includes the Crown, a corporation sole, and a body of persons (whether corporate or unincorporated).
Pest*	An organism specified as a pest in a pest management plan.
Pest Management Plan*	A plan, made under Part V of the Act, for the management of a particular pest or pests.
Plant	Any plant, tree, shrub, herb, flower, nursery stock, culture, vegetable, or other vegetation; and also includes any fruit, seed, spore and portion or product of any plant; and also includes all aquatic plants.
Possum Control Operation	Region wide possum control being undertaken on rateable land by Horizons under the auspices of this Plan.
Possum Management Area	The area of rateable land where possum control is to be undertaken either as part of Horizons' Possum Control Operation programme or under the OSPRI programme
Prehensile	In relation to possums, the ability to grasp things by wrapping the tail around them.
Principal Officer*	a) in relation to a regional council, its chief executive; and b) in relation to a region, the chief executive of the region's regional council and includes an acting chief executive.
Progressive containment programme	Where the outcome for the programme is to contain and reduce the geographic distribution of the subject to an area over time.
Property Boundary	Legal boundary that divides one property from another (usually associated with different owners).
Risk Goods*	Means any organism, organic material, or other thing, or substance, that (by reason of its nature, origin, or other relevant factors) it is reasonable to suspect constitutes, harbours, or contains an organism that may – a) cause unwanted harm to natural and physical resources or human health in New Zealand; or b) interfere with the diagnosis, management, or treatment, in New Zealand, of pests or unwanted organisms.
Reasonable Measures	Measures being undertaken by an Affected Occupier (or on behalf of an Affected Occupier) to manage the pest or it impacts, in accordance Section 4.7.1 of this Plan. Reasonable measures include participating in a Horizons-led management programme.

Term	Description
Region	The term Region (with a capital 'R') refers to the Manawatu-Wanganui Region over which Horizons has jurisdiction as determined in accordance with the Local Government Act 1974.
Regional Council	A regional council constituted under Part 1A of the Local Government Act 2002.
Residual Trap Catch (RTC)	(For possums). A measure of the relative abundance for possums based on the number of possums caught on a standard number of traps over a standard number of nights following the National Possum Control Agencies protocol for possum monitoring.
Road	Means all formed roads (including road verges) from the centre of the road to an abutting property boundary and includes all bridges, culverts and fords forming part of any road, but does not include unformed (paper) roads.
RPAMS	Horizons' Regional Pest Animal Management Strategy 2009.
RPPMS	Horizons' Regional Pest Plant Management Strategy 2007.
Rule	Means a rule included in a pest management plan in accordance with Section 73(5) of the Act.
Service Delivery	Works conducted by Horizons with no direct cost to the property owner. See also direct control.
Stakeholders	The beneficiaries and exacerbators identified in this Plan as bound by and contributing to the Plan.
Strategy (the)	Horizons' draft Regional Biosecurity Strategy and Programmes (a document which attended the Proposed Regional Pest Plan 2015-2035)
Significant	In relation to indigenous biological diversity means areas of significant indigenous vegetation and significant habitats of indigenous fauna.
Site-led	A programme that focuses on protecting certain values at certain sites.
Species-led	A proactive programme, concentrating on a specific species throughout the Region.
Spread	To expand over a larger area.
Sustained control programme	Where the outcome for the programme is to provide for the sustained control of the subject in an area to a level where externality impacts are manageable
Surveillance	The active searching for new incursions of invasive pests.
Territorial Local Authority	A District or City Council.
Taonga	Treasures, entities (living and inanimate) with great value.
Transport corridor	Means local roads, state highways and railway lines as owned or occupied by district/city councils, NZ Transport Agency and KiwiRail.
Unwanted Organism* (Unwanted Organism Register)	Organisms that have been determined unwanted by Chief Technical Officers of government departments with biosecurity interests. The Register also contains organisms declined importation by the Environmental Protection Authority (EPA) and organisms listed in the second schedule of the Hazardous Substances and New Organisms Act 1996.
Viability	Of sites – measure of ability to retain site values over time, either in terms of retaining soil (soil conservation) or maintaining genetic, species, or ecosystem diversity (biodiversity) or in terms of retaining natural processes, cycles or systems within an ecosystem.
Wilding	In relation to conifers, means any tree established by natural means, or any tree that has not been purposefully planted.
Working Day*	Means any day except – a) a Saturday, a Sunday, Good Friday, Easter Monday, Anzac Day, Labour Day, the Sovereign's birthday, and Waitangi Day; and Wellington Anniversary Day; and b) a day in the period commencing on the 20th day of December in any year and ending with the 15th day of January in the following year.
Zero Levels	Where the pest is destroyed from that area but accepting that the pest may continue to appear in the area after destruction due to seed sources or migration from an unmanaged area.

Horizons' Proposed Regional Pest Management Plan 2017-2037

*Biosecurity Act 1993 Section 73 and 74 Analyses
(satisfaction of Plan requirements)*

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Executive Summary

This report undertakes an assessment of Horizons' Regional Pest Management Plan 2017-2037 (the Plan) against the matters specified in section 73 (**Fourth step**) of the Biosecurity Act 1993 (the Act) and makes observations to be considered by the Council under section 74 (**Fifth step**) of the Act.

Section 73 **Fourth step: approval of preparation of plan and decision on management agency** has six clauses (see Appendix 1). Some of the requirements have been addressed already through earlier resolutions of Council, including section 73(1), whereby Council was satisfied with the level of consultation and **approved the preparation of the Plan** on the 7th June, 2017. Further, in accordance with section 73(2) Council applied Section 100 of the Act and decided that **the Manawatu-Wanganui Regional Council is the management agency** for the Plan.¹

This report therefore deals with the requirements of section 73(3) of the Act with regard to the matters to be specified in the Plan. This section provides that a plan must specify the following:

- (a) The pest or pests to be eradicated or managed;
- (b) The plan's objectives;
- (c) The principal measures to be taken to achieve the objectives;
- (d) The means by which the achievement of the plan's objectives will be monitored or measured;
- (e) The sources of funding for the implementation of the plan;
- (f) The limitations, if any, on how the funds collected from those sources may be used to implement the plan;
- (g) The powers in Part 6 [of the Act] to be used to implement the plan;
- (h) The rules, if any;
- (i) The rules, if any, that are good neighbour rules;
- (j) The management agency;
- (k) The actions that local authorities, local authorities of a specified class or description, or specified local authorities may take to implement that plan, including contribution toward the cost of implementation;
- (l) The portions of road, if any, adjoining land covered by the plan and, as authorised by section 6 [of the Act], also covered by the plan;
- (m) The plan's commencement date and termination date;
- (n) Any matters required by the national policy direction.

This report goes through each of these specific matters in turn, quoting the sections from the Plan and supporting documents that address them. **These matters are considered to have been met.**

¹ See Regional Council Meeting, 7 June 2017, Resolution 17-99.

This report then briefly discusses the degree to which the Plan provides for compensation for losses incurred as a direct result of the Plan (s 73(4)). **The Plan does not provide for any compensation for losses incurred.**

The report then discusses matters relating to the rules in the Plan to check that the rules follow the purposes for rules as specified in section 73(5), the application of rules as specified in section 73(6), and the consistency of rules with the policies set out in the National Policy Direction (NPD). **The rules are considered to be consistent with the provisions of the Act and the policies in the NPD.**

Finally, section 74 ***Fifth step: satisfaction on contents of plan and requirements*** has five clauses (see Appendix 1) that Council needs to consider have been satisfied before progressing to the final step, which is to make a decision on the Plan. This report reviews each of the requirements under section 74 in turn and makes observations to assist the Council through this important process.

Introduction

When the Act was amended in 2012, it introduced six steps into the regional pest management plan-making process. The steps are set out in sections 70 to 75 of the Act and include:

- s. 70 First step: plan initiated by proposal;
- s. 71 Second step: satisfaction on requirements;
- s. 72 Third step: satisfaction with consultation or requirement of more consultation;
- s. 73 Fourth step: approval of preparation of plan and decision on management agency;
- s. 74 Fifth step: satisfaction on contents of plan and requirements;
- s. 75 Sixth step: decision on plan.

In the preparation of the Plan, Horizons has completed the first three steps, resolving on the 7th June 2017 to prepare the Plan after being satisfied (among other things) that the proposed Plan had met the requirements of the Act (see sections 70 and 71), and that there had been sufficient consultation. The Plan is in a final draft stage of completion, and is now subject to the consideration by Council that it is complete and consistent with the requirements of sections 73 and 74 of the Act.

This report undertakes an assessment of the matters specified in section 73, addressing each of the clauses of that section in turn. The report then makes observations to be considered by the Council pursuant to section 74.

Section 73 Fourth step: approval of preparation of plan and decision on management agency

As noted above sections 73(1) and (2) of the Act were addressed as part of earlier decision making processes and resolutions of Council. Set out below are the requirements of section 73(3) of the Act and associated commentary with regard to the matters to be specified in the Plan.

Section 73 (3) – *Matters to be specified in the Plan*

Section 73 clause (3) has 14 sub-clauses (a to n) that require the Plan to specify particular matters. These are addressed in turn below, cross referencing the relevant section(s) of the Plan.

(a) The pest or pests to be eradicated or managed:

The animals to be managed as pests under the Plan are listed in Table 2-1 along with their management regime. The plants to be managed as pests under the Plan are listed in Table 2-2 along with their management programme.

Each pest is described and their effects classified in Tables 5-1 (pests to be excluded from the Region); 5-4 (pests to be eradicated from the Region); 5-9 (pests to be progressively contained); and 5-19 (pests that are under sustained control). These management programme types are synonymous with the programme types listed in the NPD.

(b) The Plan's objectives:

Section 5.2 provides the introduction to the Objectives, outlining the specifications that have been applied to each pest or class of pests. The objectives have been written in accordance with the specifications for objectives under the NPD.

In the body of the Plan (*Part Two: Pest Management*) the objectives for each pest or class of pest are provided in tables that describe the management regime for the pest or class of pest. In each table, the objectives are supplemented with aims that describe the intermediate outcome and extent of management. For instance, the objective that applies to the pests classed as "exclusion programme" pests is set out in Table 5-2. The objective highlights that over the life of the Plan, pests under this management regime will be excluded from the whole region to prevent their establishment and so preventing their effects on economic wellbeing and the environment. The objective identifies that it applies to each of the pests listed in Table 5-1, thereby linking each of the pests to be excluded from the Region to the Exclusion Programme objective. The aims describe the intermediate outcome that Horizons expects as a result of the programme.

The objectives and associated aims for each pest or class of pest appear in Tables 5-1 (Exclusion programme pests); 5-5 (rook); 5-7 (Eradication programme pest plants); 5-11 (*Contorta*, dwarf mountain, mountain, and Scots pines); 5-13 (other mapped Progressive Containment pest plants); 5-15 (Progressive Containment aquatic pest plants); 5-17 (other non-mapped Progressive Containment plants); 5-21 (possum); and 5-23 (feral rabbit).

(c) The principal measures to be taken to achieve the objectives:

Section 5.3 provides an overview of the types of principal measures Horizons may undertake over the course of implementing the Plan to achieve the objectives. The principal measures are largely aligned with the collective regional council template for pest management plans, thus keeping the

Plan consistent with the principal measures of other regional councils. This gives effect to the tenet of the NPD to improve plan consistency among councils.

In the body of the Plan (*Part Two: Pest Management*) the principal measures for each pest or class of pest are provided in tables that describe the management regime for the pest or class of pest. For instance, the principal measures that apply to the pests classed as “exclusion programme” pests are given in Table 5-2 as *Service Delivery; Council inspection; Advocacy and education; and Requirement to act* – each of these being the main actions Horizons believes will result in the pests listed in Table 5-1 being excluded from the Region.

The principal measures for each pest or class of pest appear in Tables 5-1 (Exclusion programme pests); 5-5 (rook); 5-7 (Eradication programme pest plants); 5-11 (*Contorta*, dwarf mountain, mountain, and Scots pines); 5-13 (other mapped Progressive Containment pest plants); 5-15 Progressive Containment aquatic pest plants); 5-17 (other non-mapped Progressive Containment plants); 5-21 possum); and 5-23 (feral rabbit).

(d) The means by which the achievement of the Plan’s objectives will be monitored or measured:

Section 6.1 (*Measuring the extent to which the objectives are being achieved*) provides the list of monitoring techniques Horizons will undertake to monitor the effectiveness of the Plan. Some of the measures are more pertinent to some groups of pests than others. For this reason, a component of monitoring has also been added to each of the tables that describe the management regime for the pest or class of pest in the body of the Plan. For instance, the general measures for monitoring listed in Section 6.1 are useful for monitoring the pests in the “exclusion programme” so the monitoring component of Table 5-2 directs the reader to that section; whereas the measures for monitoring possums (Table 5-20) has an explicit reference to the Possum Control Operation (PCO) programme and the use of established industry monitoring protocols for the monitoring programme to be suitably tailored.

The monitoring measures for each pest or class of pest appear in Tables 5-1 (Exclusion programme pests); 5-5 (rook); 5-7 (Eradication programme pest plants); 5-11 (*Contorta*, dwarf mountain, mountain, and Scots pines); 5-13 (other mapped Progressive Containment pest plants); 5-15 Progressive Containment aquatic pest plants); 5-17 (other non-mapped Progressive Containment plants); 5-20 (possum); and 5-22 (feral rabbit).

(e) The sources of funding for the implementation of the Plan:

Section 8.3 (*Funding sources and rationale*) directs the reader to the document *Horizons’ Amended Proposed Regional Pest Management Plan 2017-2037: Allocation of Costs following the National Policy Direction for Pest Management (Section 7)*. This document reports the sources of funding for each pests or class of pests identified in the Plan, and is incorporated into the Plan by reference.

(f) The limitations, if any, on how the funds collected from those sources may be used to implement the Plan:

Section 8.5 (*Funding limitations*) includes a statement that targeted rates can only be used on the subject for which the rate is targeted toward. This is the only limitation on the use of funds.

(g) The powers in Part 6 to be used to implement the Plan:

Section 7 (*Powers conferred*) lists all of the powers from Part 6 of the Act that Horizons may use to implement the Plan.

(h) The rules, if any:

Each pest or class of pest has a sub-section called *Specific Rules* to indicate the start of the rule suite for each pest or class of pest. The rules appear in Tables 5-3 (Exclusion programme pests); 5-6 (rook); 5-8 (Eradication programme pest plants); 5-12 (*Contorta*, dwarf mountain, mountain, and Scots pines); 5-14 (other mapped Progressive Containment pest plants); 5-16 Progressive Containment aquatic pest plants); 5-18 (other non-mapped Progressive Containment plants); 5-21 (possum); and 5-23 (feral rabbit).

For ease of cross-reference, all of the rules from the Plan are presented in Table 1 in a later section of this document (Section 73 (4) – Rules).

(i) The rules, if any, that are Good Neighbour Rules:

Each pest or class of pest has a sub-section called *Specific Rules* to indicate the start of the rule suite for them. Any Good Neighbour Rules are specifically identified as such within the Plan. Good Neighbour Rules are specific to a particular pest or a class of pest and appear in 5-14 (other mapped Progressive Containment pest plants); 5-18 (other non-mapped Progressive Containment plants); 5-21 (possum); and 5-23 (feral rabbit).

For ease of cross-reference, all of the Good Neighbour Rules from the Plan are presented in Table 1 in a later section of this document (Section 73 (4) – Rules).

(j) The management agency:

Section 1.1 (*The management agency*) identifies that Horizons (the trading name of the Manawatu-Wanganui Regional Council) is the management agency for the Plan.

(k) The actions that local authorities, local authorities of a specified class or description, or specified local authorities may take to implement the Plan, including contributing towards the cost of implementation:

Section 4.5 (Territorial Local Authorities) names the ten local authorities who are contained or partly contained within the Region. As a group, the local authorities are affected by requirements under the Plan to manage pests on the land that they administer either as roading authorities or as owners or occupiers of lands in the Region. Section 4.5 identifies that each local authority will be bound by the rules in the Plan, with the exception (by default) of Taupo District Council, which does not administer land or roads in the Manawatu-Wanganui Region.

The actions arising from being bound by rules in the Plan are listed generally in Section 5.3.1 (*Requirement to act*) and listed more specifically under the heading *Requirement to act* in each of the management regime tables for each pest or class of pest. These are Tables 5-1 (Exclusion programme pests); 5-5 (rook); 5-7 (Eradication programme pest plants); 5-11 (*Contorta*, dwarf

mountain, mountain, and Scots pines); 5-13 (other mapped Progressive Containment pest plants); 5-15 Progressive Containment aquatic pest plants); 5-17 (other non-mapped Progressive Containment plants); 5-20 possum); and 5-22 (feral rabbit).

The rules also describe actions to be taken, and there are some rules that specifically apply to local authorities as roading authorities and/or occupiers of land. The rules appear in Tables 5-3 (Exclusion programme pests); 5-6 (rook); 5-8 (Eradication programme pest plants); 5-12 (*Contorta*, dwarf mountain, mountain, and Scots pines); 5-14 (other mapped Progressive Containment pest plants); 5-16 Progressive Containment aquatic pest plants); 5-18 (other non-mapped Progressive Containment plants); 5-21 (possum); and 5-23 (feral rabbit).

Section 4.6 (*Occupiers of road reserves*) describes the extent of the road reserve which roading authorities are responsible for controlling pests.

As their share of the cost of implementing the Plan, Section 4.5 states that each territorial authority will be responsible for meeting its costs of complying with this Plan.

(l) The portions of road, if any, adjoining land covered by the Plan and, as authorised by section 6 [of the Act], also covered by the Plan:

Section 4.6 (*Occupiers of road reserves*) describes the situations where portions of a road are to be managed by the occupier of adjoining land, in accordance with the specification listed in s 6(1) of the Act.

(m) The Plan's commencement date and termination date:

Section 1.5 (*Duration*) describes the commencement date as being the date that the Plan receives the common seal of the Manawatu-Wanganui Regional Council. As the date that affixing the seal is not yet known, it cannot be written into the Plan in this section.

The termination date has been specified as December 2037 simply for certainty, and on the basis that this is at least 20 years from the date on which Horizons expects the seal to be affixed.

(n) Any matters required by the national policy direction:

Section 3.5 (*Relationship with the National Policy Direction*) and more specifically Table 3-1 describes the extent to which Horizons has ensured the Plan is not inconsistent with the NPD. During consultation on the *Amended Proposed Plan* (which forms the basis of the Plan), Horizons' staff consulted staff from the Ministry for Primary Industries (MPI). MPI staff were comfortable that Horizons' had met the NPD requirements. There has been no change to the relevant sections.

Section 73 (4) – Compensation

Section 73 (4) states that a plan:

- (a) *May provide for the payment of compensation for losses incurred as a direct result of the implementation of the plan:*
- (b) *Must not provide for the payment of compensation for the following losses: [etc].*

Section 4.2 of the Plan (*Compensation and disposal of receipts*) states that the Plan does not provide for any compensation for losses incurred as a direct result of the implementation of the Plan or for the losses listed in section 73(4), thereby meeting these requirements of the Act.

Section 73 (5) – Rules

Section 73(5) sets out that a plan may include rules for all or any of the 19 purposes (a to s) listed in the section. The full extract of section 73(5) is found in Appendix 1.

Table 1 presents each rule (by rule number) from the Plan with its explanation and the corresponding purpose(s) sub-clause letter. A rule can have more than one purpose, and Table 1 identifies at least one purpose, although there may be more. The important point for present purposes is that each of the rules readily fall within the purposes set out in section 73(5).

Table 1: The rules from the Plan cross-referenced to the purposes for rules from section 73(5) of the Act

Rule	Explanation	Purpose – s73
Duty to Inform Rule 5.3.1	All occupiers who become aware of the pests listed in <i>Table 5-1</i> in the place they occupy must inform Horizons of the presence of those pests within five working days of the discovery of the pest.	(a)
Wallaby Rule 5.3.2	No person shall possess a live dama or Bennett’s wallaby, or any other pest in <i>Table 5-1</i> in the Region without prior written permission from Horizons.	(e), (h) (j)
Rookery Management Rule 5.6.1	No person shall attempt to control rooks or rookeries without prior permission from an Authorised Person.	(d), (e), (j)
Duty to Inform Rule 5.6.2	All occupiers who become aware of rookeries in the place which they occupy must inform Horizons of the presence of those rookeries within five working days of the discovery of the pest.	(a)
Duty to Inform Rule 5.8.1 All eradication pests	All occupiers (excluding the Crown, TLAs, roading and rail authorities) who become aware of any of the pests listed in <i>Table 5-4</i> in the place which they occupy must inform Horizons of the presence of these pests within 5 working days of the discovery of the pest.	(a)
TLAs, Road and Rail Authorities Rule 5.8.2 All eradication pests	Every TLA, roading authority and rail authority must not less than once every calendar year identify the presence of the pest plants identified in <i>Table 5-4</i> where they occur within the road reserve as defined in <i>Section Error! Reference source not found.</i> , (or with respect to KiwiRail, the rail corridor), and other places they occupy. The pests must be managed in accordance with an agreed Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an Authorised Person).	(a), (b), (h)
Occupier Responsibility Rule 5.8.3 Woolly nightshade and Chinese pennisetum	With the exception of the Crown, TLAs, roading and rail authorities; Every occupier must not less than a once year identify the presence of any woolly nightshade and Chinese <i>pennisetum</i> within the place they occupy. Upon discovery, the occupier must notify Horizons within 5 working days and then destroy all woolly nightshade and Chinese <i>pennisetum</i> in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person).	(a), (b), (h)
Other Rateable Land Rule 5.8.4 For other eradication pests except Woolly nightshade and Chinese pennisetum	With the exception of woolly nightshade and Chinese <i>pennisetum</i> , where the occupier of a place is opposed to control of the pests listed in <i>Table 5-4</i> being undertaken by an Authorised Person, the occupier must, within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of the pest, destroy the pest(s) listed in <i>Table 5-4</i> located in the place they occupy. The occupier must notify Horizons when the pest is destroyed within 5 working days of it being destroyed.	(b), (e), (h)
Karioi Forest Zone Progressive Containment Rule 5.12.1	An occupier of land within the Karioi Forest Zone (<i>Error! Reference source not found.</i>) must: (i) destroy all <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine in the Karioi Forest Mixed Species Plantation Area at the time of harvest.	(f), (h)

Rule	Explanation	Purpose – s73
	An occupier must maintain to zero levels of these pests in compartments adjacent to, and within, recently felled compartments and exposed wetlands or stream margins. (ii) maintain zero levels of all Contorta pine, dwarf mountain pine, mountain pine, and Scots pine within 30 metres of the Karioi Forest Mixed Species Plantation Area. (iii) inspect every three calendar years, the area of the: - Karioi Forest Balance Area subject to control; and - Karioi Forest Mixed Species Plantation Area buffer (within 30m of the current Karioi Forest Species Plantation Area); for <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine. All <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine found shall be destroyed by the occupier within 21 days of discovery (or as negotiated with an Authorised Person).	
Karioi Forest Zone Monitoring Report Rule 5.12.2	The occupier(s) of the Karioi Forest must provide Horizons with annual reports detailing how rule 5.12.1 is being complied with. The annual reports must be provided by 31 July for the previous calendar year and : (i) detail the physical area where destruction has been carried out; (ii) detail the total area (in hectares) subject to ongoing management of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine; and (iii) provide a current map showing the extent of the Karioi Mixed Species Plantation Area.	(b)
Duty to Inform Rule 5.12.3	With the exception of the occupiers above, all occupiers of rateable land in the Active Management Zone for <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine, who become aware of these pests in the places they occupy, must inform Horizons of the presence of the pest(s) within 5 working days of the discovery of the pest.	(a)
TLAs, Road and Rail Authorities Rule 5.12.4	Every TLA, roading authority and rail authority must not less than once every calendar year identify the presence of <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine where they occur within the Active Management Zone for these species within the road reserve as defined in <i>Section Error! Reference source not found.</i> , (or with respect to KiwiRail, the rail corridor), and other places they occupy. The pests must be managed in accordance with an Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an Authorised Person).	(a), (b), (h)
Other Private Land Rule 5.12.5	Where the occupier is opposed to action being undertaken by an Authorised Person to destroy <i>Contorta</i> pine, dwarf mountain pine, mountain pine, and Scots pine within the Active Management Zone for these species, the occupier must destroy the pests located in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of these pests. The occupier must notify Horizons within 5 working days of the destruction of the pest.	(b), (e), (h)
Duty to Inform Rule 5.14.1 Within the Active Management Zone	All occupiers of rateable land greater than 4 hectares within the respective Active Management Zone for banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard, who become aware of the presence of these pests in the place which they occupy, must inform Horizons of the presence of that pest within 5 working days of the discovery of the pest.	(a)
Rateable Land Rule 5.14.2 Within the Active Management Zone	Where the occupier of rateable land is opposed to action being undertaken by an Authorised Person to destroy banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard within the Active Management Zone, the occupier must, destroy the pests located in the place they occupy within 21 calendar days (or within a time period as negotiated with an Authorised Person) of being notified by an Authorised Person of the presence of these pests. The occupier must notify Horizons within 5 working days of the destruction of the pest.	(b), (e), (h)
TLAs, Road and Rail	Every TLA, roading authority and rail authority, must not less than once every	(a), (b), (h)

Rule	Explanation	Purpose – s73
Authorities Rule 5.14.3 Within the Active Management Zone	calendar year identify the presence of banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard within the Active Management Zone, where they occur within the road reserve as defined in <i>Section Error! Reference source not found.</i> , (or with respect to KiwiRail, the rail corridor), and other places they occupy. The pests must be managed in accordance with an agreed Approved Management Plan, with a report provided to Horizons on the outcome of the plan by 31 July for the previous calendar year (or within a time period as negotiated with an Authorised Person).	
Good Neighbour Rule 5.14.4 Within the Active Management Zone	Other occupiers of non-rateable land (including occupiers of non-rateable Māori owned land, and Crown Agencies) within the respective Active Management Zone for banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard must destroy these species within the place(s) they occupy within the 'nominal distance for management from the boundary' specified in <i>Table 5-10</i> for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the land they occupy in the Active Management Zone. Reasonable Measures include participation in a Horizons-led Mapped Progressive Containment Pest Plant Programme.	(h) (m)
Clear Land Rule 5.14.5 In the Good Neighbour Process Zone	All occupiers within the Good Neighbour Process Zone, where banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant, or old man's beard is present within the 'Threshold Infestation Size' specified in <i>Table 5-10</i> , must destroy that pest in the place(s) they occupy within 21 calendar days of the discovery of the pest(s) (or within a time period as negotiated with an Authorised Person).	(h)
Good Neighbour Rule 5.14.6 In the Good Neighbour Process Zone	With the exception of occupiers covered by rule 5.14.5, all occupiers within the Good Neighbour Process Zone (including the Crown, roading and rail authorities) must destroy any banana passionfruit, boneseed, Darwin's barberry, evergreen buckthorn, grey willow, moth plant or old man's beard in the place(s) they occupy within the 'nominal distance for management from the boundary' specified in <i>Table 5-10</i> for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the land they occupy in the Good Neighbour Process Zone.	(m)
Non-dispersal Rule 5.16.1	No person will distribute, sell, exhibit, propagate or dispose of any eelgrass, hornwort, egeria, lagarosiphon or reed sweetgrass, except at Authorised Landfills or Authorised Green Waste Dump sites, or as authorised by a resource consent pursuant to the RMA.	(e)
Clear Land Rule 5.19.1	All Occupiers of a place greater than 4 hectares where Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass and yellow ragwort is present within the 'Threshold Infestation Size' specified in <i>Table 5-10</i> for these pests, must destroy that pest within 21 calendar days of the discovery of the pest(s) (or within a time period as negotiated with an Authorised Person) in the place they occupy.	(h)
Good Neighbour Rule 5.19.2	All Occupiers of a place greater than 4 hectares must destroy any Australian sedge, blackberry, broom species (exotic), field horsetail, gorse, nodding thistle, tutsan, variegated thistle, yellow bristlegrass or yellow ragwort in the place(s) they occupy within the 'nominal distance for management of the boundary' specified in <i>Table 5-10</i> for these pests, or have an Approved Management Plan in place to manage the spread of these pests, with respect to the boundary with an Affected Occupier, within 21 calendar days of the discovery of the pest (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy the pest on the place they occupy.	(h) (m)
	All occupiers of:	(h) (e), (m)

Rule	Explanation	Purpose – s73
Good Neighbour Rule 5.22.1	<ul style="list-style-type: none"> • Non-rateable land adjacent or within the Possum Management Area; or • Rateable land to which a Horizons Possum Control Operation has been denied access; <p>Must ensure that possum density is maintained, on average, below 10% Residual Trap Catch (or equivalent measure of possum abundance) on the land they occupy within 200m of the boundary of an Affected Occupier, or have an Approved Management Plan in place to manage the spread of possums, where the Affected Occupier is undertaking Reasonable Measures to control possums on the land that they occupy. Reasonable measures include the land being subject to a current Horizons Possum Control Operation.</p>	
Good Neighbour Rule 5.24.1	<p>Upon the discovery of rabbits at level 5 (or higher) of the Modified McLean Scale (<i>Table 5-24</i>), all Occupiers must destroy feral rabbits located in the place(s) they occupy so as to maintain populations below level 5 of the Modified McLean Scale within 200m of their boundary, or have an Approved Management Plan to manage the spread of rabbits, with respect to the boundary with an Affected Occupier, within 21 calendar days of discovery (or within a time period as negotiated with an Authorised Person). For this rule to apply, the Affected Occupier must be taking Reasonable Measures to destroy rabbits in the place they occupy.</p>	(h) (m)

Section 73 (6) – Rules may...

Section 73 clause (6) is presented in this report for completeness and to provide reassurance that a rule may:

- Apply generally or to different classes or descriptions of persons, places, goods, or other things;
- Apply all the time or at 1 or more specified times of the year;
- Apply throughout the region or in a specified part or parts of the region, with, if necessary, another rule on the same subject matter applying to another specified part of the region;
- Specify that a contravention of the rule creates an offence under section 154N(19).

Horizons' Plan makes use of these allowances under the Act, and they have been complied with.

Section 74 Fifth step: satisfaction on contents of plan and requirements

Section 74(a) through (e) of the Act required the Council to be satisfied of certain matters in relation to the Plan prepared under section 73, as set out below.

Section 74 (a) – that the plan is not inconsistent with -

S.74(a)(i) the national policy direction;

As identified above, Section 3.5 (Relationship with the National Policy Direction) and more specifically Table 3-1 describe the extent to which Horizons has ensured the Plan is not inconsistent with the NPD. The NPD is attached as Appendix 2 for reference to each of the Directions.

The NPD **Directions on Setting Objectives** (s.4) clause (1) requires that, for each subject (pest or pests) in the Plan, the objectives in the Plan must:

(a) *state the particular adverse effect or effects of the subject on the matters listed in section 54(a) of the Act that the plan addresses;*

The adverse effects appear in the objective statements for each pest or class of pests. These descriptions of adverse effects are derived from s 54(a) of the Act, thereby making the objectives entirely consistent with this NPD requirement.

The objectives must also:

(b) *state the pest management intermediate outcomes that the plan is seeking to achieve, being one or more of the following intermediate outcomes:*

- (i) *“exclusion” which means to prevent the establishment of the subject that is present in New Zealand but not yet established in an area;*
- (ii) *“eradication” which means to reduce the infestation level of the subject to zero levels in an area in the short to medium term;*
- (iii) *“progressive containment” which means to contain or reduce the geographic distribution of the subject to an area over time;*
- (iv) *“sustained control” which means to provide for ongoing control of the subject to reduce its impacts and its spread to other properties;*
- (v) *“protecting values in places” which means that the subject that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place; and...*

The terms “exclude”, “eradicate or reduce”, “contain or reduce”, or “control” appear in the objective statements for each pest or class of pests, as appropriate to the management regime described in Section 5.2 of the Plan, thereby making the objectives entirely consistent with this NPD requirement.

For each of the applicable outcomes described above (these being sub clauses (1)(b)(i) to (iv) of the NPD), sub clause (1) (c) requires that the objectives specify:

- (i) *the geographic area to which the outcome applies; and*
- (ii) *the extent to which the outcome will be achieved (if applicable); and*
- (iii) *the period within which the outcome is expected to be achieved;*

Each of the objectives and their associated aims provides for the particular geographic area within which the Plan applies. The alternative geographic area is defined as being a reduction of infestation

inside an active Management Zone (the conifer species), or containment to and reduction within a Good Neighbour Process Zone (the mapped Progressive Containment species).

The aims associated with the objective state the extent to which the outcome will be achieved and the period over which the outcome is expected. The Plan therefore contains the information required by the NPD. While this is under the title "Aim", the information is associated with the statement under the title "Objective" and therefore, the Plan is not inconsistent with the NPD.

NPD sub clauses (1)(d) and (1)(e) do not apply as the Plan does not contain any programmes under the intermediate outcome of "protecting values in places".

NPD sub clause (1)(f) requires that:

(f) if the period within which the pest management intermediate outcome is expected to be achieved is more than 10 years, state what is intended to be achieved in the first 10 years of the plan, or during the current term of the plan prior to next review (as applicable).

The aims state the extent to which the outcome will be achieved in the first 10 years of the Plan.

NPD s.4 clauses (2) **Pathway management plan** and (3) **Small-scale management programme** do not apply, as the Plan does not specifically contain these types of programme.

The NPD **Directions on Programme Description** (s.5) clause (1) requires that...

For each subject in a pest management plan or pathway management plan, the plan must contain one or more of the following programmes, and may not contain any other types of programmes:

(a) "Exclusion Programme" (if applicable) in which the intermediate outcome for the programme is to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet established in an area:

(b) "Eradication Programme" (if applicable) in which the intermediate outcome for the programme is to reduce the infestation level of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term:

(c) "Progressive Containment Programme" (if applicable) in which the intermediate outcome for the programme is to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time:

(d) "Sustained Control Programme" (if applicable) in which the intermediate outcome for the programme is to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties:

(e) "Site-led Pest Programme" (if applicable) in which the intermediate outcome for the programme is that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place:

(f) for pathway management plans, if none of the programmes in subclause (a) to (e) are applicable, the plan must contain a "Pathway Programme" in which the intermediate outcome for the programme is to reduce the spread of harmful organisms.

Sections 5.5 to 5.8 of the Plan list four of these programme types (respectively: Exclusion; Eradication; Progressive Containment; and Sustained Control). The intermediate outcomes of the objective of these programmes match the programme type descriptions.

Section 5 (2) requires that:

The specific names for programmes as set out in sub clause (1)(a) to (f) must be used as appropriate in all pest management plans and pathway management plans.

The Plan is entirely consistent with the NPD in this regard.

Section 5 (3) requires that:

The programme selected for a subject in a plan under sub clause (1) must be consistent with the pest management intermediate outcome stated for the subject in the plan under clause 4 of this national policy direction.

The Plan is entirely consistent with the NPD in this regard.

The NPD **Directions on Analysing Benefits and Costs** (s.6) clauses have been covered extensively in the supporting documents titled:

Horizons' Amended Proposed Regional Pest Management Plan 2017-2037: National Policy Direction - Section 6(1) analysis;

Horizons' Amended Proposed Regional Management Plan 2017-2037: Analysis of benefits and costs following the National Policy Direction for Pest Management Section 6(2-4).

These documents are on Horizons' website and are incorporated into the Plan by reference.

The NPD **Directions on Proposed Allocation of Costs for Pest and Pathway Management Plans** (s.7) clauses have been covered extensively in the supporting document titled:

Horizons' Amended Proposed Regional Pest Plan 2017-2037: Allocation of costs following the National Policy Direction for Pest Management (Section 7).

This document is on Horizons' website and is incorporated into the Plan by reference.

The NPD **Directions on good Neighbour Rules** (s.8) clause has been covered extensively in the supporting document titled:

Horizons' Amended Proposed Regional Pest Plan 2017-2037: Analysis of Good Neighbour Rules following the National Policy Direction for Pest Management (Section 8).

This document is on Horizons' website and is incorporated into the Plan by reference.

The NPD **Directions on timing of Inconsistency Determination** (s.9) was covered when Council resolved that the existing regional pest management strategies were not consistent with the NPD.²

In summary, Council can be satisfied that the Plan is not inconsistent with the NPD.

S.74(a)(ii) any other pest management plan on the same organism;

The Plan contains species that are managed by other regional councils in their respective regions through their management Plans. The submissions from neighbouring regional councils indicate, with the exception of a number of plant species, that the Plan is consistent with their objectives.

The Waikato Regional Council made some useful observations regarding species where the two Plans' objectives were not necessarily one hundred percent aligned. However, those observations were not about inconsistencies between the Plans and more about WRC's desire to work closely with Horizons to inform occupiers on the regional boundary which rules apply when and where.

² See Strategy & Policy Committee, 14 March 2017, Resolution SP 17-10.

With respect to the possum, which is managed as a pest agent by OSPRI under the national Plan for bovine TB (BvTB), the Plan is complementary to, and not inconsistent with, the objectives of that Plan. While Horizons' objectives for the PCO programme has a higher threshold of possum density than densities usually sought by the BvTB programme, nothing in the Plan inhibits OSPRI from undertaking its programme within the Possum Management Area specified in the Plan.

The Council can be satisfied that the Plan is not inconsistent with other plans for the same species.

S.74(a)(iii) any pathway management plan;

The only pathway management plan known is the Fiordland Marine Regional Pathway Management Plan, and the Plan is not inconsistent with its policies and objectives.

S.74(a)(iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991;

The One Plan generally permits the activities regarded as the "normal" pest plant and animal control that would be required to achieve the objectives of the pest Plan. In this regard, Council can be satisfied that the (pest) Plan is not inconsistent with the One Plan.

S.74(a)(v) any regulations;

Section 3.2 of the Plan covers the legislative background to the Plan. Every effort was made to ensure that the Plan is consistent with or does not derogate from other regulations.

During submission and consultation, the Department of Conservation expressed some concern that the implementation of the Good Neighbour Rules on conservation estate might derogate from the Conservation Act. This concern has been addressed by adding to each Good Neighbour Rule the ability for DOC to have an Approved Management Plan overseeing pest management on some land, so long as the AMP ensures that the objectives of the Plan are met at the same time.

During submission and consultation, the NZ Transport Agency expressed concern that the Plan might encourage adjoining occupiers to undertake roadside pest plant control, at the risk to their safety and as a hazard to other road users. This concern has been address with amendment to section 4.6 identifying that adjoining occupiers may only undertake control on their side of the boundary fence.

No other submissions raised concern about the consistency of the Plan to other legislation or regulations. Council can be satisfied that the Plan is not inconsistent with other regulations.

Section 74 (b) – that for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other courses of action

As noted above, the NPD **Directions on Analysing Benefits and Costs** (s.6) clauses have been covered extensively in the supporting document titled:

Horizons' Amended Proposed Regional Management Plan 2017-2037: Analysis of benefits and costs following the National Policy Direction for Pest Management Section 6(2-4).

This document concludes that for each of the pests in the Plan, the benefits of the Plan outweigh the costs. Some of the benefit and cost analyses for the Progressive Containment Pest Plants show that

the benefits of the Plan are balanced finely with the costs of management. The Plan is only cost beneficial if the gradual reduction of the infestation of these pests (through complete removal via the Clear Land Rule) is achieved as proposed. Monitoring of the efficacy of this rule is advised.

Council can be satisfied that, the Plan is cost beneficial for each subject, after taking into account the likely consequences of inaction or other courses of action, where the objectives are being met.

Section 74 (c) – that for each subject of the plan, persons who are required, as a group, to meet directly any or all of the costs of implementing the Plan -

S.74(c)(i) will accrue, as a group, benefits outweighing the costs; or

S.74(c)(ii) contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan;

As noted above, the NPD **Directions on Proposed Allocation of Costs for Pest and Pathway Management Plans** (s.7) clauses have been covered extensively in the supporting document titled:

Horizons' Amended Proposed Regional Pest Plan 2017-2037: Allocation of costs following the National Policy Direction for Pest Management (Section 7).

This document describes both the beneficiaries that are benefiting from outweighed costs and the measure of their share (thus addressing s.74(c)(i)) and the exacerbators who are required to contribute (thus addressing s.74(c)(ii)).

Overall, for each subject of the plan, this requirement is satisfied.

Section 74 (d) – that for each subject of the plan, there is likely to be adequate funding for the implementation of the plan for the shorter of its proposed duration and 5 years;

The objectives of the Plan have been written with awareness of the current and near future funding requirements and potential limitation to budget expansion. As Council heads into a new round of Long Term Plan (LTP) deliberations staff will prepare funding proposals for the next 10 years of Plan activity. Council can be satisfied that the mechanisms that are in place to serve the formation of the LTP will also operate to ensure that the Plan is adequately catered for.

Section 74 (d) – that each rule -

S.74(e)(i) will assist in achieving the plan's objectives;

The rules are grouped by their purposes in considering this requirement, where:

- "Duty to inform" rules will assist Horizons to detect the presence of the pest. Early intervention is critical to the success of the Plan.
- The "Wallaby" rule restricting possession of wallaby and "Non-dispersal" rule for aquatic pest plants will discourage people within the Region from acquiring and keeping these pests in situations where they may escape or be disposed on in a way that establishes viable

populations in the Region (for wallaby) or parts of the Region where they are not yet established (for aquatic pest plants).

- The “Rookery Management” rule restricts the ability for occupiers to attempt to control rookeries to limit the fragmentation and further dispersion of the rookeries (which would otherwise make it more difficult to manage the pest).
- The “TLAs, Road and Rail Authorities” rules will assist with the management of pests on roadsides, with the help of the agencies most qualified to do this safely. These rules will help slow the spread of the pests along road corridors. The rules also help manage pests on non-rateable estates that are occupied by these agencies.
- “Occupier Responsibility” rules for Woolly nightshade and Chinese pennisetum assist by imposing on occupiers the requirement to manage these pests expeditiously and fairly. While Horizons could undertake to control these pests through service delivery, the analysis of benefits shows the occupier as the exacerbator who benefits the most.
- The “Other Rateable Land” rule for other eradication pest plants, “Other Private Land” rule for *contorta*, dwarf mountain, mountain, and Scots pines, and the “Rateable Land Rule” for mapped progressive containment pest plants, assist by imposing on occupiers the requirement to manage these pests expeditiously in the event that the occupier does not want Horizons to manage these pests for them.
- Karioi forest zone rules for management and monitoring assist by imposing on these occupiers the requirement to manage and report on their progress in removing plantations of *contorta*, dwarf mountain, mountain, and Scots pines. Staff note that is considered one of the main sources of wilding of these species on the volcanic plateau.
- The “Good Neighbour” rules assists by imposing on occupiers the responsibility to reduce the spread of pests from the place they occupy on to their neighbours. This places some of the weight of responsibility for managing the spread of pests on to the exacerbators.
- The “Clear Land” rules assist by imposing on occupiers the responsibility for eradicating small infestations of pests, leading to the progressive containment of those pests to large intractable infestations only.

Council can be satisfied that the rules will assist in meeting the objective of the Plan.

S.74(e)(ii) will not trespass unduly on the rights of individuals;

Staff do not believe the Plan trespasses unduly on the rights of individuals.

Appendix 1

Reprint
as at 1 July 2016



Biosecurity Act 1993

Public Act	1993 No 95
Date of assent	26 August 1993
Commencement	see section 1(2)

Reprinted as at
1 July 2016

Biosecurity Act 1993

Part 5 s 73

- (b) whether the persons likely to be affected by the plan or their representatives have already been consulted and, if so, the nature of the consultation; and
 - (c) the level of support for, or opposition to, the proposal from persons who are likely to be affected by it.
- (3) If the council is satisfied as required by subsection (1), the council must apply section 73.
- (4) If the council is not satisfied as required by subsection (1), the council may require consultation to be undertaken on the proposal.
- (5) If the council requires consultation to be undertaken, the council must determine the way or ways in which the consultation must be undertaken, including, but not limited to, ways such as—
- (a) consultation with persons likely to be affected by the plan or with their representatives;
 - (b) the appointment by the council of 1 or more persons to carry out an independent inquiry into the proposal on terms of reference set by the council;
 - (c) public notification of the proposal and the receipt of submissions.
- (6) After the consultation required by the council has been undertaken, the council must apply subsection (1) again.

Section 72: replaced, on 18 September 2012, by section 39 of the Biosecurity Law Reform Act 2012 (2012 No 73).

73 Fourth step: approval of preparation of plan and decision on management agency

- (1) If the council is satisfied as required by section 72(1) and is satisfied that the issues raised in all the consultation undertaken on the proposal have been considered, the council may take the fourth step in the making of a plan, which is to approve the preparation of a plan.
- (2) If the council approves the preparation of a plan, the council must apply section 100 to decide which body is to be the management agency.

Matters to be specified

- (3) A plan must specify the following matters:
- (a) the pest or pests to be eradicated or managed;
 - (b) the plan's objectives;
 - (c) the principal measures to be taken to achieve the objectives;
 - (d) the means by which the achievement of the plan's objectives will be monitored or measured;
 - (e) the sources of funding for the implementation of the plan;

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Part 5 s 73

Biosecurity Act 1993

Reprinted as at
1 July 2016

- (f) the limitations, if any, on how the funds collected from those sources may be used to implement the plan:
- (g) the powers in Part 6 to be used to implement the plan:
- (h) the rules, if any:
- (i) the rules, if any, that are good neighbour rules:
- (j) the management agency:
- (k) the actions that local authorities, local authorities of a specified class or description, or specified local authorities may take to implement the plan, including contributing towards the costs of implementation:
- (l) the portions of road, if any, adjoining land covered by the plan and, as authorised by section 6, also covered by the plan:
- (m) the plan's commencement date and termination date:
- (n) any matters required by the national policy direction.

Compensation

- (4) A plan—
 - (a) may provide for the payment of compensation for losses incurred as a direct result of the implementation of the plan:
 - (b) must not provide for the payment of compensation for the following losses:
 - (i) loss suffered because a person's income derived from feral or wild organisms is adversely affected by the implementation of the plan:
 - (ii) loss suffered before an inspector or authorised person establishes the presence of the pest on the place of the person suffering the loss:
 - (iii) loss suffered by a person who fails to comply with the plan.

Rules

- (5) A plan may include rules for all or any of the following purposes:
 - (a) requiring a person to take specified actions to enable the management agency to determine or monitor the presence or distribution of the pest or a pest agent:
 - (b) requiring a person to keep records of actions taken under the rules and to send to the management agency specified information based on the records:
 - (c) requiring the identification of specified goods:
 - (d) prohibiting or regulating specified methods that may be used in managing the pest:
 - (e) prohibiting or regulating activities that may affect measures taken to implement the plan:

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Reprinted as at
1 July 2016

Biosecurity Act 1993

Part 5 s 73

- (f) requiring audits or inspections of specified actions:
 - (g) specifying, for the purposes of section 52(a), the circumstances in which the pest may be communicated, released, or otherwise spread:
 - (h) requiring the occupier of a place to take specified actions to eradicate or manage the pest or a specified pest agent on the place:
 - (i) requiring the occupier of a place to take specified actions to eradicate or manage the habitat of the pest or the habitat of a specified pest agent on the place:
 - (j) prohibiting or regulating specified activities by the occupier of a place if the activities are of the kind that would promote the habitat of the pest on the place:
 - (k) requiring the occupier of a place to carry out specified activities to promote the presence of organisms that assist in the control of the pest on the place:
 - (l) prohibiting or regulating specified activities by the occupier of a place, which deter the presence on that place of organisms that assist in the control of the pest:
 - (m) requiring the occupier of a place to carry out specified treatments or procedures to assist in preventing the spread of the pest:
 - (n) requiring the owner or person in charge of goods to carry out specified treatments or procedures to assist in preventing the spread of the pest:
 - (o) requiring the destruction of goods if the goods may contain or harbour the pest or otherwise pose a risk of spreading the pest:
 - (p) prohibiting or regulating specified uses of goods that may promote the spread or survival of the pest:
 - (q) prohibiting or regulating the use or disposal of organic material:
 - (r) prohibiting or regulating the use of specified practices in the management of organisms that may promote the spread or survival of the pest:
 - (s) prohibiting or regulating the movement of goods that may contain or harbour the pest or otherwise pose a risk of spreading the pest.
- (6) A rule may—
- (a) apply generally or to different classes or descriptions of persons, places, goods, or other things:
 - (b) apply all the time or at 1 or more specified times of the year:
 - (c) apply throughout the region or in a specified part or parts of the region with, if necessary, another rule on the same subject matter applying to another specified part of the region:
 - (d) specify that a contravention of the rule creates an offence under section 154N(19).

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Part 5 s 74

Biosecurity Act 1993

Reprinted as at
1 July 2016

Section 73: replaced, on 18 September 2012, by section 39 of the Biosecurity Law Reform Act 2012 (2012 No 73).

74 Fifth step: satisfaction on contents of plan and requirements

If the council is satisfied that section 73 has been complied with, the council may take the fifth step in the making of a plan, which is for the council to consider whether the council is satisfied, in relation to the plan prepared under section 73,—

- (a) that the plan is not inconsistent with—
 - (i) the national policy direction; or
 - (ii) any other pest management plan on the same organism; or
 - (iii) any pathway management plan; or
 - (iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991; or
 - (v) any regulations; and
- (b) that, for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other courses of action; and
- (c) that, for each subject of the plan, persons who are required, as a group, to meet directly any or all of the costs of implementing the plan—
 - (i) will accrue, as a group, benefits outweighing the costs; or
 - (ii) contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan; and
- (d) that, for each subject of the plan, there is likely to be adequate funding for the implementation of the plan for the shorter of its proposed duration and 5 years; and
- (e) that each rule—
 - (i) will assist in achieving the plan's objectives; and
 - (ii) will not trespass unduly on the rights of individuals.

Section 74: replaced, on 18 September 2012, by section 39 of the Biosecurity Law Reform Act 2012 (2012 No 73).

75 Sixth step: decision on plan

- (1) When the council is satisfied of the matters in section 74, the council must prepare a written report on the plan.
- (2) If the council has received submissions on the proposal, the council must—
 - (a) set out in the report the council's reasons for accepting or rejecting the submissions; and
 - (b) give a copy of the report to every person who made a submission.
- (3) The report must give the council's decision on the plan.

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Reprinted as at
1 July 2016

Biosecurity Act 1993

Part 5 s 76

- (4) The council must give public notice—
- (a) stating the council's decision on the plan; and
 - (b) stating where the plan resulting from the council's decision can be read.
- Section 75: replaced, on 18 September 2012, by section 39 of the Biosecurity Law Reform Act 2012 (2012 No 73).

76 Application to Environment Court about plan

- (1) This section applies to the plan resulting from the council's decision under section 75(3).
- (2) The following matters may be the subject of an application to the Environment Court:
- (a) any aspect of the plan;
 - (b) whether the plan is inconsistent with the national policy direction;
 - (c) whether the process requirements for a plan in the national policy direction, if there were any, were complied with.
- (3) If consultation on the proposal for the plan was undertaken by way of public notification of the proposal and the receipt of submissions, a person who made a submission on the proposal may make an application to the Environment Court.
- (4) If consultation on the proposal was undertaken other than by way of public notification of the proposal and the receipt of submissions, the following persons may make an application to the Environment Court:
- (a) a person who participated in consultation during the preparation of the proposal and whose views were provided or recorded in writing;
 - (b) a person who participated in consultation on the proposal and whose views were provided or recorded in writing;
 - (c) a person who is likely to be affected by the plan and did not participate in consultation only because the person was not given an opportunity to participate.
- (5) The application must be made within 15 working days after the date of the public notice.
- (6) The application is made under section 291 of the Resource Management Act 1991 and regulations made under the Resource Management Act 1991.
- (7) The court must hold a public hearing on the application.
- (8) The court must—
- (a) dismiss the application; or
 - (b) direct the council to modify the plan, delete a provision from the plan, or insert a provision in the plan.

Section 76: replaced, on 18 September 2012, by section 39 of the Biosecurity Law Reform Act 2012 (2012 No 73).

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- (e) consider what is the best mechanism(s) to impose the cost allocation, taking into account the cost allocation method chosen, the most effective control tools and agents to undertake the control to meet the objectives of the plan, practicality, administrative efficiency, security of funding and any statutory requirements; and
- (f) document the steps and assessments carried out under sub clause (a) to (e) and the rationale for the proposed allocation of costs, and make them publicly available with the proposal for a pest or pathway management plan.

8. DIRECTIONS ON GOOD NEIGHBOUR RULES

Regional pest management plan

- (1) Before a rule can be identified as a good neighbour rule in a regional pest management plan, the regional council must be satisfied of the matters in sub clause (a), (c), and (d) and must comply with the requirements in sub clause (b) and (e):
 - (a) In the absence of the rule, the pest would spread to land that is adjacent or nearby within the life of the plan and would cause unreasonable costs to an occupier of that land.
 - (b) In determining whether the pest would spread as described in sub clause (a) the regional council must consider the proximity and characteristics of the adjacent or nearby land and the biological characteristics and behaviour of the particular pest.
 - (c) The occupier of the land that is adjacent or nearby, as described in sub clause (a), is taking reasonable measures to manage the pest or its impacts.
 - (d) The rule does not set a requirement on an occupier that is greater than that required to manage the spread of the pest to adjacent or nearby land as described in sub clause (a).
 - (e) In determining the rules to be set to manage the costs to an occupier of land that is adjacent or nearby, of the pest spreading, the regional council must consider:
 - (i) the biological characteristics and behaviour of the particular pest; and
 - (ii) whether the costs of compliance with the rule are reasonable relative to the costs that such an occupier would incur, from the pest spreading, in the absence of a rule.

9. DIRECTIONS ON TIMING OF INCONSISTENCY DETERMINATION

Pest management plan and pathway management plan

- (1) The Minister or regional council must make a determination under section 100E of the Act, as to whether a pest management plan or pathway management plan is inconsistent with the national policy direction, within 18 months of the Governor-General approving the making, revocation, or replacement, of the national policy direction.

Clerk of the Executive Council

Appendix 2

National Policy Direction For Pest Management 2015

JERRY MATEPARAE, Governor-General

Order in Council

At Wellington this day of 2015

Present:

His Excellency the Governor-General in Council

Pursuant to section 57(7) of the Biosecurity Act 1993, His Excellency the Governor-General, acting on the advice and with the consent of the Executive Council and on the recommendation of the Minister for Primary Industries (having satisfied the requirements of that Act), approves the following National Policy Direction for Pest Management 2015.

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PREAMBLE

New Zealand's pest management system is complex, due to the biological nature of pests and the differing impacts they have. Many parties are involved in managing pests, including central government agencies, regional councils, industry groups, Māori, non-Government organisations, landowners and occupiers, community groups and the public. These parties carry out a range of pest management activities to protect New Zealand's economic, environmental, human health and socio-cultural values. Pests have the potential to cause significant harm to these values.

Part 5 of the Biosecurity Act 1993 (the Act) supports the eradication or effective management of harmful organisms in New Zealand by providing for the development of national or regional pest and pathway management plans, and small-scale management programmes. Part 5 also provides for the appropriate distribution of costs associated with these plans and programmes. The national and regional plan processes provide for consultation with communities on the control of established pests that are of concern to them. A regional council may declare a small-scale management programme in the region if a pest could be eradicated or controlled effectively with small-scale measures within three years of the measures starting.

These plans and programmes must meet the purpose of Part 5 of the Act, which is to provide for the eradication or effective management of harmful organisms that are present in New Zealand by providing for:

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

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

The Act requires the responsible Minister to make a national policy direction. National and regional pest and pathway management plans and regional small-scale management programmes must be consistent with the national policy direction.

PURPOSE OF THE NATIONAL POLICY DIRECTION

Under section 56(2) of the Act the purpose of the national policy direction is to ensure that activities under Part 5 of the Act provide the best use of available resources for New Zealand's best interests and align with one another, when necessary, to contribute to the achievement of that Part.

The national policy direction will do this by:

- a. clarifying requirements for Part 5 regulatory instruments; and
- b. ensuring consistent application of these requirements nationally and between regions, as appropriate.

WHAT DOES THE NATIONAL POLICY DIRECTION APPLY TO?

Although a significant amount of pest management occurs outside of the Act, this national policy direction only applies to pest management activities that occur under the Act. Specifically, it applies to proposals for national and regional pest and pathway management plans, the plans themselves, and regional small-scale management programmes under the Act. The term "plan" refers to plans for pests that have been developed by national pest management agencies or regional councils. Depending on the wording of the particular direction, directions apply to some or all of these instruments.

Persons developing and making any of the instruments referred to above must comply with this national policy direction together with requirements prescribed in the Act itself.

The national policy direction is not meant to be a substitute for, or prevail over, the Act's statutory purpose or the existing statutory tests.

This national policy direction is a disallowable instrument but is not a legislative instrument for the purposes of the Legislation Act 2012.

WHAT ARE THE IMPLICATIONS OF NOT MEETING THE REQUIREMENTS IN THE NATIONAL POLICY DIRECTION?

Before the Minister can recommend to the Governor-General that an Order in Council be made to approve a national pest or pathway management plan, the Minister needs to be satisfied that the proposed plan, and the process undertaken for the proposed plan, are not inconsistent with the national policy direction.

Before a regional council can make a regional pest or pathway management plan or small-scale management programme, the regional council needs to be satisfied that the proposed plan or programme, and the process undertaken for the proposed plan or programme, are not inconsistent with the national policy direction.

An application can be made to the Environment Court if a party considers that a regional pest or pathway management plan is inconsistent with the national policy direction, or if a process requirement for a proposed plan did not comply with the national policy direction.

If the Environment Court considers that the application has merit, it can direct the regional council to change the plan.

1. TITLE

This national policy direction is the National Policy Direction for Pest Management 2015.

2. COMMENCEMENT

This national policy direction will take effect 28 days after the date of the publication of a notice in the New Zealand Gazette stating that the Governor-General has approved the direction.

3. INTERPRETATION

1. In this national policy direction, unless the context otherwise requires:

“**Act**” means the Biosecurity Act 1993.

“**Exacerbator**” means a person who contributes to the creation, continuance, or exacerbation of the problems proposed to be resolved by a pest or pathway management plan.

“**Subject**”

- (a) in relation to a proposal for a pest management plan, means the organism or organisms proposed to be specified as a pest or pests under the plan; and
 - (b) in relation to a pest management plan, means the pest to which the plan applies; and
 - (c) in relation to a proposal for a pathway management plan, or to a pathway management plan, means the pathway or pathways to which the proposal for a plan, or to which the plan, applies; and
 - (d) in relation to a small-scale management programme, means the unwanted organism specified in the programme.
2. Any term or expression that is defined in the Act and used, but not defined, in this national policy direction has the same meaning as in the Act.

4. DIRECTIONS ON SETTING OBJECTIVES

Pest management plan

- (1) For each subject in a proposal for a pest management plan, or in a pest management plan, the objectives in the plan must:
 - (a) state the particular adverse effect or effects of the subject on the matters listed in section 54(a) of the Act that the plan addresses; and
 - (b) state the pest management intermediate outcomes that the plan is seeking to achieve, being one or more of the following intermediate outcomes:
 - (i) “exclusion” which means to prevent the establishment of the subject that is present in New Zealand but not yet established in an area;
 - (ii) “eradication” which means to reduce the infestation level of the subject to zero levels in an area in the short to medium term;

- (iii) “progressive containment” which means to contain or reduce the geographic distribution of the subject to an area over time;
 - (iv) “sustained control” which means to provide for ongoing control of the subject to reduce its impacts and its spread to other properties;
 - (v) “protecting values in places” which means that the subject that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place; and
- (c) for each applicable outcome in sub clause (1)(b)(i) to (iv), specify –
- (i) the geographic area to which the outcome applies; and
 - (ii) the extent to which the outcome will be achieved (if applicable); and
 - (iii) the period within which the outcome is expected to be achieved; and
- (d) for the outcome in sub clause (1)(b)(v) (if applicable), specify –
- (i) one of the following:
 - (A) the geographic area to which the outcome applies (if practicable); or
 - (B) a description of a place to which the outcome applies; or
 - (C) the criteria for defining the place to which the outcome applies; and
 - (ii) the extent to which the outcome will be achieved (if applicable); and
 - (iii) the period within which the outcome is expected to be achieved; and
- (e) In relation to sub clause (1)(d)(i)(B) and (C), if a description or criteria is used to describe places to which an outcome applies, the description or criteria must give sufficient certainty, in the view of the relevant regional council (in the case of regional pest or pathway management plans) or the Minister responsible for the plan (in the case of national pest or pathway management plans), to land owners and occupiers so that they are aware that the outcome applies to them; and
- (f) if the period within which the pest management intermediate outcome is expected to be achieved is more than 10 years, state what is intended to be achieved in the first 10 years of the plan, or during the current term of the plan prior to next review (as applicable).

Pathway management plan

- (2) For each subject in a proposal for a pathway management plan, and in a pathway management plan, the objectives in the plan must:
- (a) state the particular adverse effect or effects of the harmful organism(s) on the matters listed in section 54(a) of the Act that the plan addresses; and
 - (b) state any key known organisms that are to be managed; and
 - (c) state the pest management intermediate outcomes to which the plan is seeking to contribute, being one or more of the following intermediate outcomes:
 - (i) “exclusion” (if applicable) which means to prevent the establishment of an organism, being spread by the subject, that is present in New Zealand but not yet established in an area;
 - (ii) “eradication” (if applicable) which means to reduce the infestation level of an organism, being spread by the subject, to zero levels in an area in the short to medium term;
 - (iii) “progressive containment” (if applicable) which means to contain or reduce the geographic distribution of an organism, being spread by the subject, to an area over time;

- (iv) “sustained control” (if applicable) which means to provide for the ongoing control of an organism, being spread by the subject, to reduce its impacts and its spread to other properties;
- (v) “protecting values in places” (if applicable) which means that an organism being spread by the subject, that is capable of causing damage to a place, is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place; and
- (d) if none of the outcomes in sub clause (2)(c)(i) to (v) is applicable, include a “Pathway Programme” in which the intermediate outcome for the programme is to reduce the spread of harmful organisms; and
- (e) for each applicable outcome in sub clause (2)(c)(i) to (iv), specify –
 - (i) the geographic area to which the outcome applies; and
 - (ii) the extent to which the outcome will be achieved (if applicable); and
 - (iii) the period within which the outcome is expected to be achieved; and
- (f) for the outcome in sub clause (2)(c)(v) (if applicable), specify –
 - (i) one of the following:
 - (A) the geographic area to which the outcome applies (if practicable); or
 - (B) a description of a place to which the outcome applies; or
 - (C) the criteria for defining the place to which the outcome applies; and
 - (ii) the extent to which the outcome will be achieved (if applicable); and
 - (iii) the period within which the outcome is expected to be achieved; and
- (g) In relation to sub clause (2)(f)(i)(B) and (C), if a description or criteria is used to describe places to which an outcome applies the description or criteria must give sufficient certainty, in the view of the relevant regional council (in the case of regional pest or pathway management plans) or the Minister responsible for the plan (in the case of national pest or pathway management plans), to land owners and occupiers so that they are aware that the outcome applies to them; and
- (h) if the period within which the pest management intermediate outcome is expected to be achieved is more than 10 years, state what is intended to be achieved in the first 10 years of the plan, or during the current term of the plan prior to next review (as applicable).

Small-scale management programme

- (3) For each subject of a small-scale management programme the objectives in the programme must:
 - (a) state the particular adverse effect or effects of the subject on the matters listed in section 54(a) of the Act that the programme addresses; and
 - (b) state the pest management intermediate outcomes that the programme is seeking to achieve, being one or more of the following outcomes:
 - (i) “exclusion” which means to prevent the establishment of the subject that is present in New Zealand but not yet established in an area;
 - (ii) “eradication” which means to reduce the infestation level of the subject to zero levels in an area in the short to medium term;
 - (iii) “progressive containment” which means to contain and reduce the geographic distribution of the subject to an area over time;
 - (iv) “sustained control” which means to provide for the ongoing control of the subject to reduce its impacts on values and its spread to other properties; and

- (c) for each applicable outcome in sub clause (3)(b), specify –
 - (i) the geographic area to which the outcome applies; and
 - (ii) the extent to which the outcome will be achieved (if applicable); and
 - (iii) the period within which the outcome is expected to be achieved.

5. DIRECTIONS ON PROGRAMME DESCRIPTION

- (1) For each subject in a pest management plan or pathway management plan, the plan must contain one or more of the following programmes, and may not contain any other types of programmes:
 - (a) “Exclusion Programme” (if applicable) in which the intermediate outcome for the programme is to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet established in an area:
 - (b) “Eradication Programme” (if applicable) in which the intermediate outcome for the programme is to reduce the infestation level of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term:
 - (c) “Progressive Containment Programme” (if applicable) in which the intermediate outcome for the programme is to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time:
 - (d) “Sustained Control Programme” (if applicable) in which the intermediate outcome for the programme is to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties:
 - (e) “Site-led Pest Programme” (if applicable) in which the intermediate outcome for the programme is that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place:
 - (f) for pathway management plans, if none of the programmes in subclause (a) to (e) are applicable, the plan must contain a “Pathway Programme” in which the intermediate outcome for the programme is to reduce the spread of harmful organisms.
- (2) The specific names for programmes as set out in sub clause (1)(a) to (f) must be used as appropriate in all pest management plans and pathway management plans.
- (3) The programme selected for a subject in a plan under sub clause (1) must be consistent with the pest management intermediate outcome stated for the subject in the plan under clause 4 of this national policy direction.

6. DIRECTIONS ON ANALYSING BENEFITS AND COSTS

Pest management plan and pathway management plan

- (1) When determining the appropriate level of analysis of the benefits and costs of the plan for each subject for the purposes of a proposal for a pest management plan or pathway management plan, a proposer must consider:
 - (a) the level of uncertainty of the impacts of the subject, or an organism being spread by the subject, and of the effectiveness of measures; and

- (b) the likely significance of the subject, or an organism being spread by the subject, or of the proposed measures, in terms of stakeholder interest and contention, and total costs of the proposed plan; and
 - (c) the likely costs of the programme relative to the likely benefits; and
 - (d) the level of certainty and the quality of the available data.
- (2) In the proposal for a pest management plan or pathway management plan, an analysis of the benefits and costs of the plan for each subject must:
- (a) identify, and quantify (if practicable), the impacts of the proposed subject or an organism being spread by the subject; and
 - (b) identify two or more options for responding to the subject or an organism being spread by the subject (one option must be either taking no action or taking the actions that would be expected in the absence of a plan); and
 - (c) identify, and quantify (if practicable), the benefits of each option; and
 - (d) identify, and quantify (if practicable), the costs of each option; and
 - (e) state the assumptions (if any) on which the impacts, benefits and costs are based; and
 - (f) be at an appropriate level of detail as determined in accordance with sub clause (1); and
 - (g) take into account any risks that each option will not achieve its objective; and
 - (h) identify any realistic mitigation options for the risks identified in sub clause (2)(g); and
 - (i) adjust the benefits and costs for each option as appropriate to take account of sub clause (2)(g) and (h); and
 - (j) clearly identify which option is preferred.
- (3) When taking into account any risks that each option will not achieve its objective under sub clause (2)(g), a proposer must consider:
- (a) the technical and operational risks of the option; and
 - (b) the extent to which the option will be implemented and complied with; and
 - (c) the risk that compliance with other legislation will adversely affect implementation of the option; and
 - (d) the risk that public or political concerns will adversely affect implementation of the option; and
 - (e) any other material risk.
- (4) When taking into account any risks that each option will not achieve its objective under sub clause (2)(g), a proposer must:
- (a) for analyses where the benefits are fully quantified, either:
 - (i) estimate the residual risks as a probability of success and calculate the expected benefits of the option by multiplying the benefits by the probability of success; or
 - (ii) state the residual risks to the programme and calculate what the probability of success would need to be to make the expected benefits equal the costs; and
 - (b) for all other analyses (where the benefits are not fully quantified):
 - (i) state the residual risks to the programme and, where practicable, give an indication of likelihood and impact; and
 - (ii) specify which of the benefits are most likely to be affected if the risk eventuated.

- (5) The proposer of a pest management plan or pathway management plan must document the assessments made in sub clauses (1), (3) and (4) and make them publicly available with the proposal for a pest or pathway management plan.

7. DIRECTIONS ON PROPOSED ALLOCATION OF COSTS FOR PEST AND PATHWAY MANAGEMENT PLANS

Pest management plan and pathway management plan

- (1) If a proposer of a pest or pathway management plan is determining an appropriate grouping of subjects, or organisms being spread by the subject, for cost allocation analysis, the proposer must consider:
- (a) whether the subjects, or organisms being spread by the subject, have similar groups of beneficiaries and exacerbators; and
 - (b) whether the exacerbators have similar existing legislative responsibilities and rights; and
 - (c) if applicable, whether the organisms in a proposed pest management plan are at a similar stage of infestation and whether the proposer has similar management objectives for the organisms.
- (2) When determining the appropriate cost allocation to be proposed for a pest management plan or pathway management plan, a proposer must:
- (a) identify and estimate the direct costs of the plan and identify the indirect costs of the plan; and
 - (b) where possible, identify the beneficiaries of the plan; and
 - (c) where possible, identify the active and passive exacerbators; and
 - (d) determine whether the best cost allocation method is to have beneficiaries or exacerbators or a mixture of both bearing the costs of the plan and determine the appropriate cost allocation by considering all of the following matters:
 - (i) the legislative responsibilities and rights of beneficiaries and exacerbators;
 - (ii) the management objectives of the plan and the stage of infestation;
 - (iii) the most effective agents to undertake the control to meet the objectives of the plan;
 - (iv) if proposing that beneficiaries bear any of the costs of the plan, how much each group of beneficiaries will benefit from the plan and whether each group of beneficiaries will benefit more than the amount of costs that it is proposed that it bear;
 - (v) if proposing that exacerbators bear any of the costs of the plan, how much each group of exacerbators is contributing to the problem addressed by the plan;
 - (vi) the degree of urgency to make the plan;
 - (vii) efficiency and effectiveness of the cost allocation method and proposed cost allocation;
 - (viii) practicality of the cost allocation method and proposed cost allocation;
 - (ix) administrative efficiency of the cost allocation method and proposed cost allocation;
 - (x) security of funding of the cost allocation method and proposed cost allocation;
 - (xi) fairness of the cost allocation method and proposed cost allocation;
 - (xii) whether the proposed cost allocation is reasonable;
 - (xiii) the parties who will bear the indirect costs of the plan;
 - (xiv) the need for any transitional cost allocation arrangements;
 - (xv) the mechanisms available to impose the cost allocation; and

- (e) consider what is the best mechanism(s) to impose the cost allocation, taking into account the cost allocation method chosen, the most effective control tools and agents to undertake the control to meet the objectives of the plan, practicality, administrative efficiency, security of funding and any statutory requirements; and
- (f) document the steps and assessments carried out under sub clause (a) to (e) and the rationale for the proposed allocation of costs, and make them publicly available with the proposal for a pest or pathway management plan.

8. DIRECTIONS ON GOOD NEIGHBOUR RULES

Regional pest management plan

- (1) Before a rule can be identified as a good neighbour rule in a regional pest management plan, the regional council must be satisfied of the matters in sub clause (a), (c), and (d) and must comply with the requirements in sub clause (b) and (e):
 - (a) In the absence of the rule, the pest would spread to land that is adjacent or nearby within the life of the plan and would cause unreasonable costs to an occupier of that land.
 - (b) In determining whether the pest would spread as described in sub clause (a) the regional council must consider the proximity and characteristics of the adjacent or nearby land and the biological characteristics and behaviour of the particular pest.
 - (c) The occupier of the land that is adjacent or nearby, as described in sub clause (a), is taking reasonable measures to manage the pest or its impacts.
 - (d) The rule does not set a requirement on an occupier that is greater than that required to manage the spread of the pest to adjacent or nearby land as described in sub clause (a).
 - (e) In determining the rules to be set to manage the costs to an occupier of land that is adjacent or nearby, of the pest spreading, the regional council must consider:
 - (i) the biological characteristics and behaviour of the particular pest; and
 - (ii) whether the costs of compliance with the rule are reasonable relative to the costs that such an occupier would incur, from the pest spreading, in the absence of a rule.

9. DIRECTIONS ON TIMING OF INCONSISTENCY DETERMINATION

Pest management plan and pathway management plan

- (1) The Minister or regional council must make a determination under section 100E of the Act, as to whether a pest management plan or pathway management plan is inconsistent with the national policy direction, within 18 months of the Governor-General approving the making, revocation, or replacement, of the national policy direction.

Clerk of the Executive Council



Manawatu-Wanganui Regional Pest Management Plan

Plan Submissions

Summary Report

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Introduction to Report

On 3 December 2015 Manawatu-Wanganui Regional Council released a Proposed Regional Pest Management Plan (the Proposal) for public comment. A total of 94 submissions were received, with a public hearing held before Council on 5 and 6 April 2016. Following the hearing of submissions Council officers reported to Council with recommendations on 14 June 2016. The Council adopted the recommendations subject to directions regarding further work regarding, among other things, the National Policy Direction for Pest Management (**NPD**) and the Good Neighbour Rules.

Council officers produced an amended proposal for consideration by Council on 7 June, 2017. Council officers reported to Council regarding the scope and nature of changes made in response to submissions and further analysis. Council determined on 7 June, 2017 that the requirements of the Biosecurity Act were met with respect to the proposal, including that matters raised in consultation had been considered (noting also the additional consultation undertaken by Council officers at the direction of the Council in the early parts of 2017). Council officers were then directed to proceed with preparing the Regional Pest Management Plan in accordance with section 73 of the Act.

This report is a compilation of the response to submissions to date. It briefly summarises the key issues arising in submissions on the Proposal, then sets out how issues have been addressed through the draft Plan, in tabular form. The submission number and submission summary are derived from the *Summary of Submissions* (an officer's report) that was prepared for the hearing. As there have been a number of changes to section and page numbering between the Proposal and the Plan, the summaries include the updated reference [in square brackets] or else indicate the reference is to the Proposal as referred to by the submitter. Where possible, the main thread of the submissions have been captured verbatim. However, while the authors have sought to represent each submission as faithfully as possible, a degree of interpretation and abridgement is unavoidable. Therefore, this document should be treated as a guide to submissions and does not replace referring to the full submissions if necessary. A compendium of full submissions is available from Horizons (within the Agenda of the 5-6 April 2016 Hearing).

The table below sets out the summaries of submissions arranged by topic, with a compilation of all recommendations of Council officers to Council over the course of the process – including through consideration of the submissions following the public hearing and in preparation of the amended proposal, which was considered by Council in conjunction with an overview of the recommendations of Council staff and key changes.

Submission analysis and recommendations

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
1. General comments						
All relevant sections	7.4	Rangitikei District Council	This Submitter makes several suggestions that appear to be related to how the Plan is implemented.	<ul style="list-style-type: none"> Publicise use of Grazon for control of Field Horsetail (until biological method proven). Make MOUs publicly available especially where implementation of Good Neighbour Rule is agreed (S4.3.3) Develop a documented transitional plan for implementation of Good Neighbour Rule to reduce uncertainty. Horizons take responsibility for responding to the effects of "natural events" such as floods and consequential spread of pest plant species on highly productive land. 	<p>Noted.</p> <p>Minor addition to Section 5.3.5 to note that MOUs will be publically available.</p>	<p>Publicising the use of Grazon is an operational / implementation matter.</p> <p>A transitional plan for Good Neighbour Rules is not needed as the revision of these rules has made them more certain and enforceable.</p> <p>Horizons does not consider it necessary or appropriate to take responsibility within the RPMP for responding to the pest plant effects of natural events.</p>
Cross references quoted in Tables in Section 2.1	12.1	Ogle	The page numbers cross-referenced here are mostly incorrect and make it difficult for the reader.	Ensure cross references are corrected.	<p>Accept.</p> <p>The cross referencing in the Tables in Section 2.1 will need to be updated to the correct page numbers on final proof of the Plan.</p>	
All relevant sections	19.1	Manawatu District Council	Manawatu District Council supports the proposed Plan in principle.	None sought.	Note support.	
All relevant sections	25.6	NZ Transport Agency	Our recent publication policy change has meant that we are no longer referred to as the "NZTA".	Replace "NZTA" with "NZ Transport Agency" or "Transport Agency" throughout the document.	Accept. All references to "NZTA" to "NZ Transport Agency" are revised as the name for the New Zealand Transport Agency.	
Plan and Strategy as two documents	51.1	DOC	The [Plan] and [Strategy] structure is confusing and parts of the [Strategy] appear to contain material that is	Re-draft entire document to either better combine the material or have as two separate	Accept in part. Remove from the Plan the Strategy and references to	Having the [Strategy] at the back of the Plan was confusing for those

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			necessary to meet requirements of S.70 and S.71 of the Biosecurity Act.	documents that stand alone.	it. Instead cite Horizons' Annual Operational Plan as the main document that contains the specifics for non-regulatory activities over any given year.	submitters that felt that a "Strategy" should contain more than Horizons non-regulatory aspects, and be the lead document for regional biosecurity thinking. For the sake of completing the Plan-making process, complete removal of the [Strategy] and reference to it is the cleanest approach.
Section 3.1	51.11	DOC	This section is poorly constructed. Figure 3-1 poorly reflects the planning hierarchy. It is difficult to ascertain from this section whether Horizons has applied a solid foundation to its decision-making process.	Review and revise this section.	Disagree. A slight revision is needed to include key drivers (per submission 91.2), but not a significant revision as suggested by this submitter.	This part of the document is derived from the nationally agreed regional council template for pest plan proposals and has been kept largely as agreed. It defines the Act requirements for this aspect of the Plan (legislative considerations) well enough.
Section 4	51.13	DOC	Noting that many rules do not have specific levels for pests, this section needs revision.	Update this section to reflect the rule structure.	Accept. Revise the section titled <i>Responsibilities of owners and/or occupiers</i> to better highlight the responsibilities of owners and occupiers under the Plan.	This section should describe the responsibilities of owners and occupiers under the Plan more generally than just compliance with rules that have thresholds on them.
Section 5.1	51.20	DOC	This section conflates two separate concepts of nationally defined intermediate outcomes and regionally defined management programmes.	Review and revise this section.	Accept in part. Revise the description of the programmes listed in the section on titled <i>Pest Management Programmes</i> to better align with the NPD description for immediate outcomes.	The section has been aligned with the NPD immediate outcomes, while keeping the language plain and in regionally familiar terms.
(was Section 6 of the Proposal)	51.37	DOC	We are uncertain as to the purpose of this section.	Review this section.	Accept. Remove this section.	Section 6 was superfluous. The analysis of the potential negative and positive consequences of

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
						the Plan has been undertaken and reported in the documentation that supports the Plan.
Section 7	51.38	DOC	The powers conferred cannot be used to allow Horizons staff to undertake activities on land administered under certain other Acts if the activities would be offences under those Acts.	Note the limitations of powers conferred imposed by S.7 of the Biosecurity Act.	Accept. Add wording added to <i>Powers conferred</i> to acknowledge the limitations that Section 7 of the Act imposes with regard to certain other Acts.	Whether implementation would affect or derogate from the provisions of other legislation has been checked in preparing the plan
All tables pertaining to pest plant programmes	81.5 (part)	KiwiRail	When identifying species for inclusion consideration needs to be given to the dispersal mechanism of the plants and the ability of them to actually be controlled. This affects the level of investment in time and cost, and in the case of the rail corridor this is significant due to the practical challenges of managing pests along the national rail corridor.	Focus pest management responses relevant to biodiversity values to regionally significant areas identified in the Regional Plan (e.g. KNE's) for Climbing Spindleberry, Mignonette Vine, Senegal Tea, Giant Reed and others. Focus pest management responses relevant to agricultural production values on high value regionally significant areas. Consider further the dispersal mechanism, seed longevity, feasibility to control the specific pest plants and moderate the control approach accordingly, taking into account the cost effectiveness and reasonableness of requiring the level of control proposed.	Note submission. These considerations have been taken into account when determining the most appropriate category for each pest plant, as well as in the cost-benefit analysis undertaken for each pest.	The submitters concerns are also practical in nature and may be further addressed through processes built into the plan framework – exemptions, MoUs etc.
Table 2-2; Relevant species tables and programmes.	91.6	Waikato Regional Council	We fully support the inclusion of the 13 [named] pest plants where there is excellent alignment between the two councils. While there is excellent alignment of these pests, the management approaches will still rely on good communication between the councils over the terms of each of the plans	None sought	Note support.	
	91.7		We note 21 further [named] pest plants	None sought.	Note submission.	

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
			where there is not alignment between the two councils. However, we support their inclusion and proposed status. We have examined the non-alignment and find no significant cross boundary issues.			
	91.12		We note 13 [named] pest plants that are in Horizons' RPMP and not in ours. We have examined the non-alignment and find no significant cross boundary issues. We support their inclusion and request notification of these plants on regional boundaries - particularly for eradication pests.	None sought – this is an operational rather than a policy issue.	Note submission.	Retaining close ties with neighbouring regional councils will be critical to the success of the Plan.
All relevant sections	93.5	MPI	Section 70 (2)(h) of the Biosecurity Act requires that proposals give an explanation of the purpose of each rule – this is missing from the rules in the proposal.	Ensure that each proposed rule includes a statement of its purpose.	Accept by adding the purpose of each rule in the sub-section <i>Requirement to Act</i> (for every pest management programme section).	
All relevant sections	93.6 and 93.8	MPI	MPI name should reference Ministry for Primary Industries. Remove reference to Ministry of Fisheries.	Change "Primary Industry" to "Primary Industries" and remove reference to Ministry of Fisheries. Check entire document.	Accept by amending the relevant sections.	
Section 3.3	93.9	MPI	3.3(b) refers to any regulation. It might be useful to clarify that both the Biosecurity Act and NPD are the most relevant to the [Plan].	Amend 3.3(b) as specified in the submission (pg. 3).	Accept by deleting the reference to "any regulation" (Section 3.3 of the proposal) and adding the relevant reference to the NPD to Section 3.2.	
Table 7-1 (Powers Conferred) (Table 8-1 in the proposal)	93.46	MPI	The table should also refer to ss 118, 121A, and possibly 119 and 134(2)	Add 118 and 121A, and consider adding 119, and 134(2).	Accept.	All available powers have been reviewed and incorporated into the Plan.
2. <i>Acacia saligna</i>						
None	12.5	Ogle	As reported by me in the past to HRC, this was known in NZ only from Durie Hill in Whanganui. WDC staff have eliminated it here, though I have heard	<i>Acacia saligna</i> should be included in the Plan as a pest plant.	No change to Plan.	Reliance on the Biosecurity Act Provisions is unnecessary for the purpose of removing this

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
			it's in cultivation in the Rangitikei District. I feel it should still be in the Horizon's list, just as, for example, <i>Schoenoplectus californicus</i> has been retained, even though it is believed to have been eliminated from the Taumarunui waste treatment ponds.			plant from the region.
3. Advocacy, community awareness, social marketing, and education						
Section 5.3.4	23.5	Palmerston North City Council	Advocacy and education regarding pest management, especially the assistance and encouragement of community groups, is supported.	[Nothing specifically noted].	No change to Plan. The requests are operational and can be incorporated into annual operational planning as part of Plan implementation.	Noting the support from these submissions for Horizons' biosecurity advocacy, community awareness and education programmes, and support for community initiatives, Horizons has kept these aspects of the Plan.
	48.10	Forest & Bird	Forest & Bird supports any progressive programmes to raise awareness and encourage behaviour change with regard to the spread of unwanted pests.	Continue the use of social marketing to change people's behaviour and awareness with regard to the spread of invasive organisms.		
	48.18	Forest & Bird	Forest & Bird supports awareness campaigns and initiatives to improve the biosecurity outcomes for the region. This should be provided with practical solutions to the issues such as provision of subsidized and/or free traps and bait with follow-up support to ensure pest and weed control is actually happening on peoples' properties.	Include capacity to follow up on awareness campaigns to ensure behaviour change actually happens.		
Section 5.3.4	48.19	Forest & Bird	Forest & Bird supports the proposed initiatives and would like to see the advice and information supported with the provision of traps and bait or bags to collect weeds.	Include the provision of traps and bait and weed bags in the implementation measures	No change to Plan. The requests are operational and can be incorporated into annual operational planning as part of Plan implementation.	Noting the support from these submissions for Horizons' biosecurity advocacy, community awareness and education programmes, and support for community initiatives, Horizons has kept these aspects of the Plan.
	48.20	Forest & Bird	Forest & Bird supports the amenity pest service provided by Horizons.	Continue with the amenity pest service as part of the biosecurity strategy for the region.		
	48.21	Forest & Bird	Forest & Bird supports the community initiative programmes for pest plants.	Continue with community initiative programmes for pest plants as part of the biosecurity strategy for the region.		
	48.23	Forest & Bird	Forest & Bird supports the community	Continue with community		

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
			initiative programmes for pest animals.	initiative programmes for pest animals, particularly the provision of written and trapping resources, as part of the biosecurity strategy for the region.		
4. Crown Agencies and State Owned Enterprises						
Section 4.4	46.3	Federated Farmers	<p>Federated Farmers is supportive of the provision in the Plan which requires all occupiers including Crown agencies and Territorial Local Authorities to be responsible for pest and weed control along roads and roadsides, and other transport corridors. Notes that: spread of pest plants is exacerbated by road works contractors, and the way transport networks operated by NZ Transport Agency and KiwiRail are managed.</p> <ul style="list-style-type: none"> • Use of glyphosate actively selects resistant weeds. • Where Crown land is managed by Territorial Authorities, this could lead to the Crown escaping their obligations and subsequently no one taking responsibility for pest management on that land. • It is the general experience of its members that Crown land, Department of Conservation and territorial authorities do not proactively control pests, but rather choose to wait until there are obvious problems and control is therefore more difficult. • The Crown should contribute on the same basis as any other land occupier within the region. • Horizons must ensure production plant and animal pests on non-rateable, Crown, Department of Conservation and Council land are adequately funded and controlled. 	<p>That Horizons, through their Memoranda of Understanding with the NZTA, will place obligations on roading contractors to employ procedures for machine hygiene and preventing the spread of pests.</p> <p>That Horizons develop a Code of Practice for good biosecurity practice, by which subcontractors are required to abide.</p> <p>That complicated land ownership will not mean a reduction in pest management service.</p> <p>That Crown land occupiers are required to carry out pest and weed control in compliance with the Regional Pest Management Plan.</p> <p>That Horizons continues to strive to obtain greater levels of funding from the Crown in order to better reflect the benefits the Crown receives from the Plan.</p> <p>That Horizons will further co-ordinate with the Department of Conservation to manage migratory pests.</p>	<p>Accept, noting that the submission is more to do with Horizons' modes of implementation, rather than changes to the Plan.</p> <p>Revision of this section of the Plan to better clarify the roles and responsibilities of Crown agencies and State Owned Enterprises (SOEs).</p>	<p>Noting that there is support/acceptance from various parties for a level of responsibility to be placed on the Crown and State Owned Enterprises occupiers, the revisions to section 4.4 highlight that Crown Agencies and SOEs are bound by the Act to the extent that they will be liable to meet the obligations or costs associated with a good neighbour rule. Those rules have been revised to give clarity to the extent to which pests are to be cleared. This section also highlights that, because SOEs are not Crown Agencies in the strict sense, they are also bound by the other rules in the Plan.</p>

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			<ul style="list-style-type: none"> Its members are concerned the Department of Conservation and Horizon's lack of co-ordination with farmers to manage migratory pests, such as possums, goats, and deer, ensuring that cleared areas are not repopulated, and pests do not spread onto farmland. 			
Section 4.4	48.5	Forest & Bird	The North Island Main Trunk Line is a significant source of pest plants and is potentially a corridor for travel of animals such as feral cats and mustelids. We would like to see inclusion of railway operators with a requirement to act regarding pest plants and animals.	Include a requirement for State Owned Enterprises to be responsible for control of infestations of pests and/or to be bound as a neighbour for the control of pests where they occur on land owned or operated by a State Owned Enterprise (e.g. KiwiRail).	Accept.	<p>KiwiRail is specifically identified as an SOE affected by the Plan.</p> <p>Section 4.4 highlights that, because SOEs are not Crown Agencies in the strict sense, they are also bound by the other rules in the Plan.</p>
Section 4.4; Section 4.6; Section 8.2 supporting documentation	51.14;	DOC	The status of Crown and occupiers as exacerbators or beneficiaries must be related to the objectives of the proposed plan. The analysis in Section 3.1 [sic] is insufficiently robust to identify the Crown as either.	<p>Following review and revision of Section 3.1 [sic], reconsider the role of Crown agencies for each of the particular pests.</p> <p>Include the rationale for why NZTA should be treated differently from other Crown agencies.</p>	<p>Accept in part.</p> <p>Revision of Section 4.4 to better clarify the roles and responsibilities of Crown agencies and State Owned Enterprises (SOEs).</p> <p>Minor revision of section 4.6 to better clarify the roles and responsibilities of roading authorities</p>	<p>In addressing concerns raised about the Plan's consistency with the NPD, the exacerbator and beneficiary analysis was revisited. This review is incorporated into the Plan by reference in Section 8.2. The analysis highlights that the occupiers of Crown lands (including Crown agencies and SOEs) are potential exacerbators of the spread of pests on to land that is being cleared of those pests.</p> <p>As exacerbators, the Crown and SOEs are identified in supporting documentation that attends the Plan and therefore further elucidation in the Plan itself is not warranted.</p>

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						A rationale identifying NZ Transport Agency alone from other Crown agencies is not necessary. As a roading authority, it stands to reason they are different from other Crown agencies.
Section 4.4.1	51.15	DOC	DOC may also hold land under the Wildlife Act and Wild Animal Control Act. DOC's structure also changed during the course of writing the plan.	Update this section in light of these additional legislative tools and recent changes to DOC.	Accept. Revision of Section 4.4.1 to include additional titles.	
All rules relating to occupiers, Crown or otherwise.	51.4	DOC	The Crown is not always the agency responsible for the management of public or Crown lands.	Clarify who is required to meet the pest management goals necessary to achieve the identified outcomes in both the [Strategy] and [Plan].	Accept in part. Each rule specifies who is responsible for pest management.	Noting that the rule wording changes clearly spell out who is responsible, it is not necessary to have specific clarification of who is required to manage pests on Crown estate.
Section 4.4; Section 4.4.3	81.2	KiwiRail	Notes KiwiRail is SOE, not Crown agency. Supports application of good neighbour rules as they relate to Crown and KiwiRail.	KiwiRail supports the application of good neighbour rules as a pragmatic approach to management of pest plants and seek to retain those as they relate to the Crown and KiwiRail.	Note submission. Minor amendment to specifically identify SOEs as well as Crown agencies in Section 4.4.	
Section 4.4.4	General consultation	NZDF	NZDF occupies more property than the three main installations quoted in the proposal.	None specifically sought	Accepted through revision of the wording describing the tenure of the New Zealand Defence Force.	
5. Territorial Local Authorities						
Section 4.5; Section 4.6	46.4	Federated Farmers	Federated Farmers support the requirements of Territorial Authorities to comply with the Plan to manage pests and weeds on their land. Territorial Local Authorities have a significant role to play in the management of plant pests. The initial spread of plant pests in the region is often by roading contractors clearing slips or working on roadsides.	That Territorial Local Authorities are required to carry out pest and weed control in compliance with the Regional Pest Management Plan. That Horizons, through their Memoranda of Understanding with Territorial Local Authorities, will place obligations on roading contractors to employ	Accept, noting support. The rules have been updated to show explicitly which ones apply to TLAs as roading authorities and occupiers of TLA lands.	Minor changes to Sections 4.5 and 4.6 due to other submissions do not change the intent of the Plan with regard to obligations on TLAs.

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			<p>Contractors can unknowingly transport seeds of noxious species with cultivation and harvesting machinery.</p> <p>A screening system should be in place to prevent the spread of weeds. Monitoring of metal sources along with contractual obligations on sub-contractors to abide by good biosecurity practice, via a Code of Practice, are needed.</p> <p>Federated Farmers is supportive of memoranda of understanding for roles and responsibilities that place on Territorial Local Authorities the need to encourage machine hygiene and the prevention of pest spread.</p>	<p>procedures for machine hygiene and preventing the spread of pests.</p> <p>That Horizons develop a Code of Practice for good biosecurity practice, by which subcontractors are required to abide.</p>		
6. Analysis of Costs and Benefits						
Section 8.1	46.18	Federated Farmers	<p>The Crown is not required to pay rates and Federated Farmers believes the funding that the Crown agencies provide for pest management is grossly disproportionate to the benefits they will receive from the Plan.</p> <p>Federated Farmers has long been an advocate for robust cost benefit analysis (CBA) as the foundation for good decision making within both local and central government. Our view is that a robust cost benefit analysis that includes the impact on the ratepayer, landowner and resource user is necessary to ensure policies and rules are balanced, fair and equitable for all.</p> <p>Federated Farmers is surprised that Horizons has not seemingly undertaken any cost benefit analysis in the preparation of this proposed Plan. While we understand this is expected to occur through the on farm biosecurity</p>	<p>That more information is provided in the Plan with respect to funding of pest management.</p> <p>That Horizons commits to undertaking a region wide cost-benefit analysis as part of a ten-year review of the Plan.</p>	<p>Accept.</p> <p>The Analysis of Benefits and Costs was revisited in light of the requirements of the NPD. The review was undertaken in a manner consistent with the NPD.</p> <p>The cost benefit analysis was incorporated into the Plan through Section 8.1.</p>	<p>A revised costs analysis included consideration of the costs incurred by parties (not just Horizons) incurred through complying with rules.</p> <p>The analysis supports the decision to retain the pests as proposed.</p>

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			<p>assessment tool, we are surprised to see there hasn't been a region wide cost-benefit analysis to determine the breakdown in funding by rates.</p> <p>In Federated Farmers' 2013 submission on the Proposed National Policy Direction for Pest Management Plans and Programmes, concern was raised regarding how a pest management or pathway management plan would be funded. When considering Councils Revenue and Financing Policies, funding is tied to the whim of politicians on a three yearly or even annual basis. Federated Farmers is unable to examine how the pest management pathway plan will be funded in the Horizons region, as there is insufficient information in the Plan.</p> <p>The National Policy Direction for Pest Management 2015 provides guidance for cost benefit analyses, including a requirement that the costs and benefits of at least two management options be evaluated. Federated Farmers notes the approach taken by Environment Canterbury which has provided three management options for each identified weed in its pest Management Plan review.</p> <p>Due to the lack of financial information or presentation of options in this Proposed Plan, submitters and the wider community are unable to accurately comment on the viability of the measures described.</p>			
Section 8.1; Section 8.4; Table 8-1	51.39	DOC	We are uneasy with this section and the assumptions contained within it. It is doubtful that the analyses of benefits	Note that the analysis of costs and benefits is not consistent with the NPD and should be	Accept. The Analysis of Benefits	A revised costs analysis included consideration of the costs incurred by

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	51.40		<p>and costs from the previous [strategies] can simply be carried over as the NPD imposes new detailed statutory requirements for carrying out such analyses.</p> <p>It appears that this [funding] table only includes the costs incurred by Horizons. These are not the full implementation costs of the [Plan], which should reflect the cost of compliance with the rules. Without this consideration and also because they are not described in Section 9.1, the plan is not consistent with the NPD.</p>	<p>reviewed before the RPMP is promulgated. Include all costs encompassed by a plan in the analysis of costs and benefits not just those carried by Horizons.</p> <p>Include all costs encompassed by a plan in the analysis of costs and benefits, not just those carried by Horizons.</p>	<p>and Costs was revisited in light of the requirements of the NPD. The review was undertaken in a manner consistent with the NPD.</p> <p>The cost benefit analysis was incorporated into the Plan through Section 8.1.</p>	<p>parties (not just Horizons) through complying with rules.</p> <p>The table describing funding Table 8-1 however, only needs to detail the sources of funding as per S.73 (3) (e) of the Act, not all of the costs associated with Plan implementation.</p>
Section 8.1; Section 8.4	81.14	KiwiRail	<p>Notes that the costs identified focus predominantly on those of the regulatory agency. Costs for landowners to comply with the rules only address the farming community (dairy, sheep and beef). There is also a focus on economic costs and implications associated with production.</p> <p>The cost for the national strategic rail network relative to the proposed benefits has not been assessed. KiwiRail considers this is important and needs to form part of the consideration of reasonable and cost effective rule provisions.</p>	Undertake a cost benefit analysis for the national strategic rail transport network.	<p>Accept in part.</p> <p>The Analysis of Benefits and Costs was revisited in light of the requirements of the NPD. The review was undertaken in a manner consistent with the NPD.</p> <p>The cost benefit analysis was incorporated into the Plan through Section 8.1.</p>	The revised costs analysis included consideration of the costs incurred by parties (not just Horizons) through complying with rules.
Section 8.1; Proposed Strategy Section 5.	84.3	Wellington Fish and Game council	<p>Prior to any further work done on these pests, the anecdotal evidence referred to in paragraph 3 [of the Strategy] should only form a limited basis for decision-making. Empirical evidence is needed with a full cost benefit analysis undertaken.</p> <p>Fish and Game supports the current approach taken by Horizons for these pests as it is appropriate to the</p>	Do not change the status of these species unless there is a full cost-benefit analysis support it.	Accept.	None of the Potential Pest Animals identified in the Strategy were included within the Plan. A benefit and costs analysis would need to be undertaken consistent with the NPD as part of their potential pest assessment before inclusion in future Plans.

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			unprotected status and levels of nuisance.			
Proposed Strategy Section 7.5.	84.4	Wellington Fish and Game council	Fish and Game supports [the proposed community initiative pest animal species].	Do not change the status of these species unless there is a full cost-benefit analysis support it.	Accept.	None of the animals listed in this part of the Strategy were moved to the Plan. A benefit and costs analysis would need to be undertaken consistent with the NPD as part of their potential pest assessment before inclusion in future Plans.
Section 8.1	93.4	MPI	The NPD requires that the CBA be documented and made publically available. The reasoning provided for adopting previous CBA is not transparent and we recommend that the CBA be made public along with evidence that the findings have not significantly changed. We consider that the CBA provided needs further work.	Review and amend CBA – refer to further submission points.	Accept. The Analysis of Benefits and Costs was revisited in light of the requirements of the NPD. The review was undertaken in a manner consistent with the NPD. The cost benefit analysis was incorporated into the Plan through Section 8.1.	
7. Aquatic pests						
Section 5.7.3	48.11	Forest & Bird	Forest & Bird supports Horizons' ongoing partnership with the MPI-led Freshwater Pests Partnership Programme (FPPP).	Continue strong support of the FPPP.	Note submission.	
Section 5.7.3	51.27 (part)	DOC	Aquatic plants may be better placed in "sustained control" programmes.	Consider moving aquatic plants to sustained control.	Disagree, although some revision is recommended. Revise the objective to control and reduce new incursions and manage specific areas (as opposed to preventing dispersal from known locations).	Noting support from other submitters for the proposed Plan, the aim to reduce current infestations remains. The "Progressive Containment" category therefore is still valid for these species.
	51.31		We support proposed approach but that the plan does not include authority to Horizons to close a site to prevent transfer of a subject should that be a necessary step to contain an infestation.	None sought.	Note submission.	The Plan contains the power to declare a controlled area (Section 131 of the Act) which should suffice for this

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						purpose.
Section 5.7.3; Proposed Strategy	84.2	Wellington Fish and Game Council	These species [<i>Egeria densa</i> , Hornwort, and <i>Lagarosiphon</i>] are aquatic plants that require collaborative work with other agencies such as Fish and Game to reach stakeholder group.	The [Plan sections] on these pests should recognise other parties in collaborating on managing these pests. [Section 4 of the Strategy] should recognise Fish and Game as a contributor to the Freshwater Pests Partnership Programme.	Accept in part, noting support. Collaboration with other agencies is a feature of the Principal Measures for aquatic pest plants.	With the removal of the Strategy, the Horizons' Annual Operational Plan contains the specifics for non-regulatory activities over any given year. Horizons acknowledges collaboration with other agencies, particularly DOC and the Fish and Game Council will be essential for the management of aquatic pests.
Table 3 of the Proposed Strategy	91.20	Waikato Regional Council	We note the practical realities of managing pest fish and are pleased to see their inclusion in the [Strategy]. We consider it may be useful to include rules governing accidental or deliberate release of pest fish to afford further protection of [biodiversity sites]. Potential rule wording is quoted pg. 23 of the submission).	None – Horizons may wish to determine the level of risk in the region posed by pest fish species.	No change to Plan, noting some support for proposed approach.	In the six years Horizons had pest fish as a statutory pest in the Pest Animals Management Strategy, these provisions were not used. Horizons believes there are other legislative instruments to adequately manage pest fish and so their inclusion in the Plan is not necessary.
Table 5-15.	93.31	MPI	To comply with the NPD, the plan must state what is intended to be achieved in the first 10 years of the plan.	As this objective refers to the plan duration, cl 4(1)(f) needs to be complied with.	Accept through the addition of a 2027 target to the aim of table 5-15.	
Table 5-16 and references to Statutory Obligations 52 and 53.	93.32	MPI	This para summarises ss 52 and 53 of the Act.	We recommend that the wording if the section be set out in full if this intended to show people what the requirements are.	Accept in part. Revise rule to prevent dispersions of aquatic pests with a note regarding the Act section 52 and 53 requirements	
Table 5-15.	94.5	Ruapehu District Council	We support the approaches proposed. It is vital that information is produced to educate the region on these practices.	None sought	Note submission.	Noting support for the proposed Plan, the aim to reduce current infestations remains.
8. Argentine ants						
Table 5-1	48.2	Forest & Bird	Horizons' Exclusion Programme should not be limited to this list. Outlying populations of plague skink occur at	Include plague skink (<i>Lampropholis delicata</i>) and Argentine ant (<i>Linepithema</i>	Note submission but with no changes to the Plan.	It is acknowledged that Argentine ant can be a significant threat to

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			Whanganui, Palmerston North and Foxton Beach. Plague skinks pose a significant environmental threat to the region. Horizons needs to partner with the Department of Conservation and MPI Biosecurity New Zealand to eradicate these pests from the region as Auckland Council has done for the incursion on Great Barrier Island. Similarly, Argentine ants pose a significant threat to the region and are already in Whanganui, this need to be added to the list as well.	<i>humile</i>) in Table 5-1.	The submissions help focus attention on pests that might need to be managed using non-regulatory measures.	biodiversity in some places but it does not need the powers under the Act for management under site-led programmes. There are commercial operators available to solve domestic ant problems, and regional intervention of this nature is not needed.
Section 3.5 of proposed Strategy	48.13	Forest & Bird	This section needs to be expanded to include animal pests that are a high risk of transfer via the movement of plants and potting mix such as Argentine ants and plague skinks or plague skink eggs.	Include pest animals, Argentine ants and plague skinks, in the list of declared pests that Horizons Biosecurity staff are required to look out for while inspecting plant nurseries and retail outlets.		Education and raising awareness may be of value, and ants can be included in Horizons' biosecurity advocacy programmes. The continued development of best practice and supporting research as initiatives arise is supported.
Table 3 of proposed Strategy	91.20	Waikato Regional Council	We consider that the specific inclusion of Argentine ants to Table 3 is warranted and sends a clear message to regional occupiers that exotic ants are a threat to New Zealand's biodiversity values.	Add this species as a new site-led pest to Table 3, section 10.4 of the [Strategy] with the inclusion of the text supplied pp. 23-24 of the submission.		Preference is now given to Horizons' Annual Operational Plan as the main document that contains the specifics for non-regulatory activities over any given year.
9. Asparagus setaceus (=plumosus)						
Section 2.1.2	12.7	Ogle	Worst invasive vine in forest on Lord Howe Island; few NZ records – at least needs surveillance here. All the Whanganui sites I knew have been cleared of this plant and no more have appeared. Worth keeping on a surveillance list.	<i>Asparagus setaceus</i> (=plumosus) should be included in the Plan as a pest plant.	Note submission, with no change to Plan.	An investigation for this species under the Potential Pest Plant programme of the current Regional Pest Plant Management Strategy (RPPMS) concluded that this species was best managed under site-led biodiversity programmes if it arose in the Region. Horizons undertakes site-

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						led biodiversity programmes outside the auspices of the Plan.
10. Banana passionfruit						
5.7.2	16.1	Onderwater	Whanganui's gullies are totally smothered in Banana Passionfruit and more emphasis should be put on its control as well as other invasive climbing invasive species.	Suggest that community groups are set up to take charge of "their" gully with support from Horizons and Whanganui District Council or DOC. This will also indirectly help with the control of other species such as woolly nightshade and wild ginger.	Note submission, with no change to the Plan. The submissions help focus attention on pests that might need to be managed using non-regulatory measures through the Annual Operational Plan.	Preference is now given to Horizons' Annual Operational Plan as the main document that contains the specifics for non-regulatory activities over any given year.
11. Barberry						
none	8.2	Oliver	Birds spread seed from roadside plants all over our farm.	None sought.	Note submission, with no change to Plan.	Given the extent of this pest through the region, the cost of a plan for barberry will likely outweigh the benefits, so an investigation has not been undertaken to date.
12. Biological control						
Section 5.3.3; Principal Measures for pests where biocontrols are available;	17.4	Greater Wellington Regional Council	For pest plant management, biocontrol is only mentioned for Tutsan, old man's beard and field horsetail.	It could be valuable to list the other species where biocontrol is a potential management option.	Accept. Revise Plan and include the biocontrol service delivery option for pests that have biocontrol available.	Section 5.3.3, and the Principal Measures, and Aims for relevant species have had minor changes inspired by this submission.
Section 8 of the proposed Strategy	25.33	NZ Transport Agency	The Transport Agency would like to be kept in contact with Horizons in regards to investigations and releases of biocontrol agents and other newly developed methods to control pest species.	No decision requested.	Note submission.	
	48.24	Forest & Bird	Forest & Bird supports the research, development and release of biocontrol agents to help fight against the myriad weed pests in New Zealand.	Continue strong support of biocontrol programmes.	Note submission.	
Section 5.3.3;	81.5 (part)	KiwiRail	KiwiRail supports the use of biological	Introduce a section to the Means	Accept in part.	

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Principal Measures for pests where biocontrols are available; Section 8 of the proposed Strategy			control as a more successful and possibly cost effective approach, particularly for gorse, broom, nodding thistle and ragwort.	of achievement: 'Biological control' and add: "Horizons will trial, introduce and release biological control agents as a management response for gorse and broom, nodding thistle and ragwort"	Section 5.3.3 revised to include biocontrol explicitly, but not restricted to the species named in the submission. Also the addition as an "Aim" of these species that Horizons will investigate biocontrol options for them.	
Section 5.3.3; Principal Measures for pests where biocontrols are available; Section 8 of the proposed Strategy	81.7	KiwiRail	Supports use of biological control because it is particularly useful in locations that are remote or challenging. Suggests reframing the approach to pest plants that have an option to be managed by biological control agents. In such cases eradication may not be necessary or desirable where biological control agents can be effectively deployed to control or contain pest plants.	Introduce or trial biological control agents. <u>Weed species that have had a biological agent introduced and established include:</u> Alligator weed Broom Californian thistle Gorse Mist flower Nodding thistle Old man's beard <u>Others being investigated include:</u> Boneseed Lagarosiphon Banana passionfruit Moth plant Blackberry Barberry	Note submission. Addition to the "Aim" of these species that Horizons will investigate biocontrol options for them.	
Section 5.3.3; Principal Measures for pests where biocontrols are available; Section 8 of the proposed Strategy	91.5	Waikato Regional Council	We support Horizons' strong involvement in biological control programme. It is important that these programmes are developed with close association to where the issues are most prevalent. Biocontrol is not part of a regulatory management approach and as such is not included in the [Plan]. A close connection between the two documents is important to ensure that management	Include support for biocontrol as part of a vision statement or guiding principles for regional pest control – as per submission point 91.2	Accept in part. Section 5.3.3 revised to include biocontrol explicitly, but not restricted to the species named in the submission. Also the addition as an "Aim" of these species that Horizons will investigate biocontrol options for them.	Noting that this submission favoured additional wording to the Strategy, more has been added to the Plan so that the Annual Operational Plan may contain as much or as little needed to support the annual programme on biocontrol research and release.

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			tools like biocontrol are seen in the same light as other methods.			
13. Biosecurity Risk Assessment Tool with reference to proposed "Eradication Rules"						
Proposed rules 5.10.5, 5.14.6, and 5.16.2; Section 4.8	41.4	Land Information New Zealand	LINZ considers it is unclear whether the on-farm Biosecurity Risk Assessment Tool applies to unallocated Crown land administered by LINZ, and therefore whether [proposed] eradication rule 5.16.2 which applies to gorse and broom would apply to such land.	Amend to clarify whether the on-farm Biosecurity Risk Assessment Tool applies to unallocated Crown land.	Note submission and resolve through other changes. Due to concern about the specificity of the Good Neighbour Rules, the Biosecurity Risk Assessment Tool is no longer used as the means to define the scope of the Good Neighbour Rules.	The intent to be delivered by the combination of the original Eradication Rules and the Biosecurity Risk Assessment Tool (to eradicate small infestations of progressive containment pests) is now delivered by the Clear Land Rules.
	93.29	MPI	Although the Strategy explains how the Biosecurity Risk Assessment Tool works, it is not clear how that Tool will be applied for the purpose of this rule.	Define the Biosecurity Risk Assessment tool within the Glossary, and how it will be applied under the [Plan].	These rules have been replaced with Clear Land Rules that more explicitly define the thresholds for pest management.	
	93.30		It is not clear enough what steps occupiers must take regarding these pest plants.	Refer to suggested wording provided in the submission (pg. 6)		
	93.37		The same comments on rule 5.10.5 apply [to rule 5.14.6].			
	93.40		The same comments on rule 5.16.2 apply [to rule 5.14.6].			
14. Biosecurity Strategy						
The proposed Strategy	51.2	DOC	Support the concept of an overarching [Strategy] but this should be a precursor to the Plan not an addendum to it.	If the [Strategy] was structured to recognise and support the variety of pest management undertaken by the range of parties throughout the region it could become the link between the One Plan and the LTP. Include the requirements of S.70 and S.71 more fully into the [Strategy].	Note submission. Due to other concerns expressed by this submitter about the completeness of the Plan and the role of the Strategy in filling NPD and BSA requirements, the Strategy is to be decoupled from the Plan. Preference is now given to using Horizons' Annual Operational Plan as the main document that contains the specifics for implementing the non-regulatory measures	To make the Strategy a precursor to the Plan is not necessary in making a Plan. The material relevant to the sections of the Biosecurity Act (s. 70 and s.71) is contained in the Plan and supporting documentation.
	51.3		The [Strategy] could contain the rationale for a proposal for a subject being progressed though S.70 and possibly S.71 of the Biosecurity Act. At present the [Strategy] does not incorporate detailed plans with respect to all of the species included in the [Plan] and therefore do not fulfil the requirements of S.70.			

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					contained in the proposed Strategy for now.	
The Proposed Strategy	91.1	Waikato Regional Council	Support the division of the document into the regulatory and the non-regulatory. It is important that the occupier and agency obligations are clearly defined and upfront. The more aspirational aspects of Horizons' pest control in the [Strategy] provide a complete picture of all of the components of biosecurity.	None sought.	Note support, however, the Strategy has been decoupled from Plan with a view to finalising the regulatory aspects of pest management through the plan at first instance.	Preference is now given to using Horizons' Annual Operational Plan as the main document that contains the specifics for the non-regulatory measures contained in the proposed Strategy. This will also enable a focus on aspirational aspects of pest management in the region.
	93.2	MPI	We support the use of the Biosecurity Strategy Document to cover related programme that would not be appropriate to include in the plan. Moving the related material to the Strategy document makes the proposed plan concise and easy to read.	None sought.	Note support, however, the Strategy has been decoupled from Plan with a view to finalising the regulatory aspects of pest management through the plan at first instance.	Preference is now given to using Horizons' Annual Operational Plan as the main document that contains the specifics for the non-regulatory measures contained in the proposed Strategy. This will also enable a focus on aspirational aspects of pest management in the region.
15. Blackberry						
Section 4.5; Section 4.6; Section 5.7.4	8.1	Oliver	We are getting dozens of new infestations of blackberry from land that is several hundred metres from our farm that is vested in Ruapehu District Council.	That section 4.4 [sic] of the [Plan] make it clear that the "roading authorities are responsible for pest plants on all land they occupy" and "Horizons will control pest plants on high value natural areas such as bush margins on the Manganui-o-te-Ao River with is national Conservation Order"	Accept in part, with some minor amendments. Small changes to Section 4.5 and 4.6 to make the responsibilities of TLAs more clear, and changes to rules for blackberry to make responsibilities clearer.	With regard to the Manganui-o-te-Ao, the management of pests at sites is outside the auspices of the Plan
Section 5.7.4	51.10 (part)	DOC	The objective of containing or reducing the geographic spread of these pests, and the basic test that greater benefits accrue by attempting to control these pests under a Plan than not, may not be met.	Develop sustained control objectives for these pests if a positive CBA can be demonstrated, else do not include these species in the [Plan].	Disagree. The Analysis of Benefits and Costs shows that the Progressive Containment approach to halt the further spread of	The Approved Management Plan concept has been introduced to provide some flexibility on the timing and extent of intervention needed, so long as the objectives of the Plan are
	92.6 (part)	NZDF	Given the definition for progressive	Re-classify blackberry, broom and		

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			<p>containment in Section 5.1.3 of the Proposed Plan, NZDF questions the inclusion and achievability of applying this category to Blackberry, Broom and Gorse. All of these species are distributed throughout the Region and quite dense in many areas.</p> <p>NZDF believes that they are so ubiquitous that should be classified as a site-led pest.</p> <p>Species that are particularly prone to spread should not be classified as progressive containment, and should be placed into other more appropriate categories. Examples include nodding and variegated thistle, old man's beard and ragwort. These species are ubiquitous throughout the Region and the profundity and highly mobile nature of the seed means the probability of continued re-invasion into cleared areas is very high.</p>	<p>gorse as site-led pests, and remove these species from [Table 5-9].</p> <p>Re-classify other spread-prone species such as nodding and variegated thistle, old man's beard and ragwort into more appropriate categories.</p>	<p>blackberry and the elimination of small infestations of the pest plant is cost beneficial.</p> <p>The Good Neighbour Rule has been amended to include a specific distance to which boundaries need to be kept clear. This is based on the main vectored distance of blackberry.</p>	<p>met through the alternative methods agreed on between the parties for managing the pest.</p>
16. Broom						
Section 5.7.4	25.27	NZ Transport Agency	<p>Broom and gorse are included in the Progressive Containment Programme. The Transport Agency agrees Progressive Containment with the inclusion of the species, however, notes that both species spread their seeds by expelling, thus if boundary control is maintained they should not adversely affect neighbours. Also, both species can provide a nurse crop for native species if the conditions are right and the site is managed correctly. The Agency requests Horizons confirm that this approach to pest control (natural succession) is one that would be acceptable should a site be considered suitable.</p>	<p>Seeks clarification/confirmation that use of broom and gorse as a nursery plants is contemplated by the Plan in appropriate situations/sites.</p>	<p>Note submission.</p> <p>The Good Neighbour Rule has been amended to include a specific distance to which boundaries need to be kept clear. This is based on the main ballistic distance of broom.</p>	<p>The Approved Management Plan concept has been introduced to provide some flexibility on the timing and extent of intervention needed, so long as the objectives of the Plan are met through the alternative methods agreed on for managing the pest.</p>
Section 5.7.4	51.10 (part)	DOC	<p>The objective of containing or reducing the geographic spread of these pests, and the basic test that greater benefits</p>	<p>Develop sustained control objectives for these pests if a positive CBA can be</p>	<p>Disagree.</p> <p>The Analysis of Benefits</p>	<p>The Approved Management Plan concept has been introduced to provide some</p>

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	92.2 (part)	NZDF	accrue by attempting to control these pests under a Plan than not, may not be met. Placing broom and gorse into progressive containment rather than sustained control seems ambitious. The distribution and density of these species do not fit well with the criteria for Progressive Containment outlined in section 5.1.3 of the Plan but better meet the criteria in section 5.1.4 for Sustained Control and it would be beneficial to see more information on a cost-benefit analysis of these options.	demonstrated, else do not include these species in the [Plan]. Place broom and gorse in a Sustained Control Programme.	and Costs shows that the Progressive Containment approach to halt the further spread of broom and the elimination of small infestations of the pest is cost beneficial. The Good Neighbour Rule has been amended to include a specific distance to which boundaries need to be kept clear. This is based on the main ballistic distance of broom.	flexibility on the timing and extent of intervention needed, so long as the objectives of the Plan are met through the alternative methods agreed on for managing the pest.
17. Bushy Park Reserve						
Aspect of the proposed Strategy	47.1	Bushy Park Reserve	Bushy Park Reserve Trust requests recognition for the huge amount of work done on the listed weeds (and many unlisted weeds) in Bushy Park Reserve.	Include Bushy Park on the Weedbusters Group List.	Note submission, with no change to Plan.	Preference is now being given to using Horizons' Annual Operational Plan as the main document that contains the specifics for the non-regulatory measures contained in the proposed Strategy.
Plan pests near site	47.2	Bushy Park Reserve	Undertake active control of the listed weeds outside the Reserve's boundaries, most obviously the large infestations of banana passionfruit beside Rangitau East Road just north of Bushy Park road entrance; old man's beard is also in some neighbouring properties.	Undertake active control of the listed weeds outside the Reserve's boundaries.		Horizons may choose to list the Weedbuster Groups and undertake site-led buffer work outside the auspices of the Plan.
18. Canada goose						
Table 2-1; Section 5.6; Proposed Strategy	15.1	Everton	Canada geese have increased to unsustainable levels. We regularly have 400-500 geese grazing on our paddocks and they are very difficult to shoot. Due to the large numbers they are a serious problem on Lake Horowhenua and a large polluter of the lake and its surroundings. The government of the time permitted	Horizons investigates securing government funding to eradicate Canada geese.	Note submission, with no change to Plan. Nothing in the Plan precludes Council from approving funding for management of potential pests at specific sites using non-regulatory methods.	The effects of Canada geese are best assessed and managed on a case by case basis. In lieu of the Potential Pest animals List in the Strategy, identify animals for investigating for future Pest

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			the introduction and protection of Canada geese. The cost of finding ways to eradicate them should not be borne by farmers.			Plans.
Table 2-1; Section 5.6; Proposed Strategy	18.1	Horowhenua Lake Domain Board	Over the last 15 years the numbers of geese and in particular Canadian Geese have increased dramatically in the Horowhenua. The invasion of this pest species is not only having a negative impact on the environment and potentially human health through increased levels of faeces but is also impacting our ancestral water and ability to undertake recreational activities at the Lake. Canada Goose has been moved from schedule 1 of the Wildlife Act 1953 to schedule 5. This change from game bird now introduces a new species into our environment with no control. We also believe that the geese have contributed to the spread of Purple Loosestrife.	Remove Canada Goose from 5.4, Table 2 [from the Strategy] and have the species added to [section 5.6] as a species to be eradicated.		
Table 2-1; Section 5.6; Proposed Strategy	22.1	Procter Trust	Over the last 20 years, Canada geese have increased dramatically in the Horowhenua, from about 10 to over 800. This species is not only having a negative impact on the economic productivity of my farm through grazing, it is having a negative effect on the environment, and potential impact on human health through increased levels of faeces. The Canada goose has now been removed from Schedule 1 of the Wildlife Act to Schedule 5 making it a control priority for regional councils. Lake Horowhenua is a treasured asset to Muaupoko and the wider Horowhenua community. Action to control this species is needed to negate negative effects it	The addition of Canada goose to Section [5.6] as an eradication species. Removal of Canada goose from Strategy Section 5.4 as potential pest.	Note submission, with no change to Plan. Nothing in the Plan precludes Council from approving funding for management for potential pests at specific sites using non-regulatory methods.	The effects of Canada geese are best assessed and managed on a case by case basis. In lieu of the Potential Pest animals List in the Strategy, Horizons may choose to identify animals for investigating for future Pest Plans.

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			has on restoration of the lake, through grazing native vegetation, and effects that their faeces have on freshwater rehabilitation.			
Table 2-1; Section 5	46.13	Federated Farmers	<p>Canada Geese were once managed by Fish and Game; however, they are now not identified in any national management framework.</p> <p>Members have noted that flocks of Canada Geese are causing significant damage to the amenity and water quality of Lake Horowhenua and difficulties for farmers in the District. Control of these pests will have environmental, social and economic benefits.</p> <p>Federated Farmers submits that:</p> <ul style="list-style-type: none"> • Canada Geese are included in the plan; • that control is undertaken by Horizons where there are significant flocks that impact on both biodiversity and productive farmland; • that Horizons take an active role in collaborating with neighbouring Councils to manage the impact of Canada Geese in the region; • work at a national level to identify possible control methods; and • lobby central government should the means to adequately manage Canada Geese be not presently available. 	<p>That Canada Goose is included in the Plan.</p> <p>That Horizons takes an active role in contributing to a national framework for the management of Canada Geese and lobbying for central government funding.</p>	<p>Note submission, with no change to Plan.</p> <p>Nothing in the Plan precludes Council from approving funding for management of potential pests at specific sites using non-regulatory methods.</p>	<p>The effects of Canada geese are best assessed and managed on a case by case basis.</p> <p>In lieu of the Potential Pest animals List in the Strategy, Horizons may choose to identify animals for investigating for future Pest Plans.</p>
Table 2-1; Section 5.6	83.1	Knight	<p>Canada geese are increasing in the Horowhenua and we regularly see flocks of over 200 landing on our pasture and crops, eating, and excreting waste making it unpalatable for stock.</p> <p>We are doing what we can with assisting with the improvement of Lake Horowhenua, and the goose problem does not help with this. We no longer go to the Lake Domain or any grassed areas there as we consider it to be unhealthy</p>	Eradication of Canada goose from the Lake Horowhenua area.	<p>Note submission, with no change to Plan.</p> <p>Nothing in the Plan precludes Council from approving funding for management of potential pests at specific sites using non-regulatory methods.</p>	<p>The effects of Canada geese are best assessed and managed on a case by case basis.</p> <p>In lieu of the Potential Pest animals List in the Strategy, Horizons may choose to identify animals for investigating for future Pest Plans.</p>

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			and revolting.			
Table 2-1; Section 5	86.1	Nicol	<ul style="list-style-type: none"> Public health issue at access sites to the lake to the public (e.g. children's play area, picnic area). Fouling of nearby pastureland. Runoff to the lake. 	Control of Canada Goose from the Lake Horowhenua area.		
Table 2-1; Section 5.6	87.14	Thomas	Canada geese are increasing at a significant rate in the Horowhenua and this population is having a detrimental effect on water quality of the lake as well as a major economic impact on the farmers around the lake. As programme of eradication of Canada goose is needed around the lake.	Add Canada Goose to the list of pest animals to be eradicated.	Note submission, with no change to Plan. Nothing in the Plan precludes Council from approving funding for management of potential pests at specific sites using non-regulatory methods.	The effects of Canada geese are best assessed and managed on a case by case basis. In lieu of the Potential Pest animals List in the Strategy, Horizons may choose to identify animals for investigating for future Pest Plans.
Table 2-1; Section 5.6	88.1	Horowhenua Farmers and Ratepayers Group	Canada geese have become established at Lake Horowhenua and are having a significant detrimental effect on the lake and the surrounding land.	Add Canada Goose to the list of pest animals to be eradicated.		
Table 2-1	92.2	NZDF	The rationale for including rabbits in the table also applies to, at least, hares, pigs, goats and possibly Canada goose. These species show similar pest characteristics as those listed for rabbits (Table 5-17). Based on the description of rabbits in Table 5-17 they would be better managed under a site-led control strategy.	Add hares, goats, pigs and possibly Canada goose to Table 2-1. Alternatively remove rabbits from Table 5-17.		
19. Chocolate vine						
Section 2.1	12.2	Ogle	Chocolate vine, <i>Akebia quinata</i> has proved intractable at Bushy Park on Rangitatau East Road, Kaiwi. WRC says "Chocolate vine appears capable of causing damage to the viability of indigenous species and ecosystems through invasion of habitat" No control method we have tried has been very effective and we are in desperate need of research or trials. Here is a classic case of a plant known to be weedy in a single site (to my knowledge) in the whole region. This is	Chocolate vine should be included as a pest plant.	Note submission, with no change to Plan.	An investigation for this species under the Potential Pest Plant programme in the current RPPMS concluded that this species was best managed under site-led biodiversity programmes. Horizons undertakes site-led biodiversity programmes outside the auspices of the Plan.

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	47.3	Bushy Park Trust	surely the ideal time to strike it! Recognition of Chocolate Vine (<i>Akebia quinata</i>) as a regional pest, as in the thorough analysis by Waikato Regional Council (attached to the submission). <i>Akebia</i> has been in Bushy Park for over 20 years. Despite much voluntary effort the extent of the vine has increased and we seek assistance with its control (hopefully eradication) before it spreads further inside and beyond the reserve.	Recognition of Chocolate Vine as a Regional Pest.		
20. Clear Land Rules and a clear land accord						
Section 4.8; All Clear Land Rules	90.3	Jones	In New Zealand we do not yet understand the value of clear land. "I have personally seen farms where all of the hard work [of weed management] has been done. Subsequent owners have failed to do this and the problem is now back at square one."	Retain legal requirements for keeping land clear of weeds and enforce these. Consider some kind of Clean Land Accord like the Clean Water accord.	Accept submission in part, through additional/greater explanation of the Clear Land Rules (and intent) and by introducing the rules to eradicate small infestations of legacy weeds such as gorse and blackberry. A Clear Land Rule is guided by the threshold, for the named pest, below which the pest should be completely removed (effectively eradicated), from the property.	As rules are made to manage pests, it is not considered appropriate to impose a general rule that land that is clear of all weeds shall be kept clear of them. However, for the Progressive Containment pest plants (of which many species are named in this submission), the Clear Land Rule has been introduced to eradicate new or small infestations so that land that is largely clear of those pests remains clear of those pests. The rules reflect the intent of the original Good Neighbour Rule (and its association with the Biosecurity Risk Assessment Tool) to eradicate small infestations. A Clear Land Accord was considered, but dismissed

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						due to complexity.
21. Cotoneaster pannosus						
Section 2.1	12.4	Ogle	There has been absolutely no action on this weed on the ground as far as I can discern. It is still growing (and spreading) close to my property and everywhere else I knew it in 2005 and 2009. Yet the report (Webb 2009) says on p.22 "it appears to be in the early stages of invasion and it is likely that eradication is achievable." It is an axiom of all weed control that the sooner control starts, the better.	<i>Cotoneaster pannosus</i> should be included in the Plan as a pest plant.	Note submission, with no change to Plan.	An investigation for this species under the Potential Pest Plant programme in the current RPPMS concluded that this species was best managed under site-led biodiversity programmes. Horizons undertakes site-led biodiversity programmes outside the auspices of the Plan.
22. Crack willow						
Section 2.1	92.2	NZDF	NZDF considers that the following additional plant species should be included in the Plan - crack willow, Corsican pine, heather.	Amend Table 2-2 and other parts of the Plan as necessary to include crack willow, Corsican pine, vipers bugloss, and heather as pest plants, and give due consideration to also including lupin.	Note submission, with no change to Plan.	Crack willow is best managed as a site-led biodiversity pest. As an Unwanted Organism, the sale and propagation of crack willow is prohibited under the Biosecurity Act irrespective of whether it is included in the Plan.
23. Decision support tool and regulatory action						
Proposal Section 4.4.3; Proposal Section 4.4.4 Replaced with changes to: Section 4.7.1; Section 4.9; Revised Good Neighbour Rules; Section 7.1	51.18	DOC	There are five key principles to be incorporated into good neighbour principles as opposed to the two principles described in this section. Determination of reasonableness / unreasonableness may be a better title to this section. Note that there is an inconsistency in the use of terms between Figure 4-1 and Figure 4-2.	Review and revise these sections as outlined in submission (pg. 8).	Accept in part, and resolve through changes set out below. The Decision Support Tool and sections 4.4.1 to 4.4.5 to be removed. The Good Neighbour Rules are more clear and specific about when they come into effect, including the requirement for the affected neighbour to be managing the pest using "reasonable measures"	Good neighbour rules have been amended and the section 8 (NPD) analysis documented by Council officers. Changes to the good neighbour rules means that there is no longer a need to include the Biosecurity Assessment Tool within the Plan itself. These requirements, to the extent relevant, have been addressed through the NPD analysis and / or incorporated into the rules themselves.
Proposal Section 4.4.5	51.19	DOC	This section identifies two new terms that are not defined, noting that a	Define RTC and NOD that is consistent with the national		

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Replaced with changes to: Section 4.7.1; Section 4.9; Revised Good Neighbour Rules; Section 7.1			Request to Clear (RTC) could be interpreted to mean an action that is inconsistent with the NPD, and that a Notice of Direction (NOD) is not defined. Default action by a regional council on DOC estate, while lawful under the Biosecurity Act cannot derogate from other laws restricting the actions involved.	Policy Direction. Review this section with regard to default action on estates with respect to limitations on public conservation lands.	(which are defined through the Plan at section 4.7.1) and provision for alternative action (which still meets the intent of the rule and objectives of the Plan) through "Approved Management Plans" (see section 4.9).	
Proposal Section 4.4.3 Replaced with changes to: Section 4.7.1; Section 4.9; Revised Good Neighbour Rules; Section 7.1	81.3	KiwiRail	Clarify that neighbour raising complaint must be actively managing their property	Amend the decision support tool Figure 4-2 to add after 1.0 Complaint Received 1A Advise the Landowner/Occupier of the Complaint. This is important prior to the inspection being undertaken to flag the issue and to understand the access constraints ad permits that may apply to entering Crown/KiwiRail land. Amend the decision support tool Figure 4-2 to add after 1.0 Complaint Received 1B Is the Owner or Occupier taking reasonable measures to manage the pest or its impacts.	Minor amendments to the section on Regulatory Action (Section 7.1) regarding notices of direction to ensure the Plan is consistent with the NPD.	
Proposal Section 9.1 Replaced with changes to: Section 4.7.1; Section 4.9; Revised Good Neighbour Rules; Section 7.1	93.48	MPI	This section refers to the DST encompassing an on-site CBA - the problem is the DST only applies to Good Neighbour Rules and may not be sufficient to comply with the requirements of cl 6 of the NPD.	Check that previous CBA comply with the requirements of s 6 of the NPD		
24. Deer						
Section 2.1	2.1	Frederikse	Free roaming deer are a problem in the areas of Delhi Ave and Papaiti Rd	That some strategy might be worked out to harvest free	Note submission, with no change to the Plan.	Including deer in the Plan would not address the issue

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			(Whanganui). We have been trying to get them culled by hunters, but numbers just seem to be increasing. We are trying to re-vegetate hill slopes, plant fruit trees, and firewood coppiced gums, but the deer continue to destroy plantings.	ranging deer.		raised. A non-regulatory approach could be considered.
25. Didymosphenia						
Section 2.1	51.24	DOC	We identify that didymo is a high value addition to the exclusion list given its potential threat to the economic strength of the region.	Include the algae <i>Didymosphenia geminata</i> in the exclusion programme.	Note submission, with no change to Plan because the regulatory aspects of the management of this species is not led by Horizons.	The present collaborative pest management activities Horizons undertakes for this species are adequate and occur outside the auspices of the Plan.
26. Relationship with, and effects on, Māori						
Section 3.4; Section 5.4; Section 6.1	11.3	Kahungunu ki Tamaki nui-a-rua	The relationships between Maori, their culture and traditions and their ancestral lands, waters, sites, wahi tapu, and taonga are referred to in the Local Government, Resource Management and Biosecurity Acts, as well as within Treaty settlement legislation. It is only proper and fair that this is reflected in the proposed [Plan].	The [Plan] be cognisant of Treaty settlement legislation so that agreements between central government and Treaty claimant entities are given due recognition in pest management within the Horizons region.	Accept submission, through additions and revisions set out below. Addition of Section 3.4 (Relationship with Māori) to recognise that one of the purposes of a pest management plan is to provide for the relationships between Māori, their culture and traditions and their ancestral lands, waters, sties, wahi tapu, and taonga.	
	11.4		Maori values and potential effects on Maori values or aspirations in relation to pest management, should not be confined to the social / amenity realm in the [Plan] as they encompass or relate to primary production and commercial activities, and environmental interests.	Amend the [Plan] at 5.4 so that the potential effects of pests and pest management on the relationship between Maori, their culture, traditions, ancestral lands, waters, sites, wahi tapu, and taonga is recognised and articulated across each of the three pest descriptors; not just for the social / amenity group.	Revision of Section 5.4 to acknowledge that this set of values sit across all pest management attributes (including managing the economic and environmental effects of pests) and not limited to social or cultural effects only.	
	11.6		Maori values and potential effects on Maori values or aspirations in relation to pest management, should not be confined to the social / amenity realm in the [Plan] as they encompass or relate to primary production and commercial activities, and environmental interests.	At 6.1 Effects on Maori, add the word "most" to the opening statement. "It is assumed that most pest animal management under the [Plan] will have a positive effect..." so that it aligns with the acknowledgement that there are instances where Maori		

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				may wish to retain some of these animals for personal use.	Adopt the change suggested to Section 6.1 (point 11.6).	
	11.7		Cultural monitoring following (some) pest control activities will help determine adverse effects on the cultural and traditional relationships that Maori have with their taonga.	Enabling of cultural monitoring by Kahungunu ki Tamaki nui-a-rua within their rohe to assess effectiveness of pest control operations where there is a likelihood of non-target impacts on taonga species.	Note submission, with no change to Plan.	These submission points are best addressed as part of Horizons' operational engagement with iwi partners.
	11.8		The relationships between Maori, their culture and traditions and their ancestral lands, waters, sites, wahi tapu, and taonga are referred to in the Local Government, Resource Management and Biosecurity Acts, as well as within Treaty settlement legislation. It is only proper and fair that this is reflected in the proposed [Plan].	That Horizons and their contractors who operate within pest management and biosecurity functions communicate and hold regular hui with Kahungunu ki Tamaki nui-a-rua and our Treaty settlement affiliates.		
27. Eradication Programme						
Section 5.1.2; Section 5.6	25.22	NZ Transport Agency	Is Horizons able to share information of pest plant distribution (e.g. a GIS layer) with the Transport Agency, so that it can be used on the Transport Agency geospatial system?	No decision requested but seeks information exchange for implementation.	Note submission.	These are operational matters which can be the subject of further discussions with the NZ Transport Agency.
	25.23		How will Horizons assist occupiers with the control of these plants? Does this extend to Crown Agencies? If it does, then it is recommended that the sharing of pest plant management information is captured in the pest plants - principal MOU.	No decision requested.		
	25.24		Please clarify whether Horizons is able to share monitoring information with the Transport Agency to help the Transport Agency programme their pest management more efficiently and effectively. Should this be the case, we ask that this is captured in the MOU.	No decision requested.		
Section 5.1.2; Section 5.6	51.25	DOC	We are unsure whether a robust assessment of feasibility has been	Review and revise this section in consideration of the points	Note submission.	The reason why white bryony and pyp grass are

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			<p>undertaken for species such as Chilean rhubarb, purple loosestrife, and woolly nightshade which are moderately common and/or are garden plants.</p> <p><i>Spartina</i> is present on private land as well as public lands and therefore Horizons has a potential role in assisting with the eradication of this plant.</p> <p>We note that white bryony and pyp grass are the subject of eradication attempts (NIPPs) within the region by MPI and DOC, but are not mentioned. In contrast Manchurian wild rice which is also a NIPP is mentioned.</p> <p>We note that the eradication programme has the goal of eradicating the species from the region but the principle means of achievement are generally limited to controlling known sites on private land. If Horizons is to be confident of eradication, it must be confident that infestation on public lands will in fact be controlled. There is a potential risk of failure. When this risk is considered in an analysis of costs and benefits, the costs may outweigh the benefits. In addition, we note that agencies may be less able to voluntarily control such species in eradication programmes in the future if the funding they have to meet [Plan] exacerbator costs is absorbed by meeting the legal obligations of Good Neighbour Rules.</p> <p>These are strategic issues that regional councils need to discuss and would be a subject best covered in the BSP. Regional eradication will require the cooperation of Crown Agencies.</p>	<p>identified, particularly;</p> <ul style="list-style-type: none"> Consider the feasibility of eradication. Include all species covered by NIPPs Identify risks to eradication if delivery is confined to private land only. 	<p>There is (up to) a moderate risk that the eradication of some of the plants listed in the Plan will not be successful for the reasons cited in this submission.</p> <p>The relevant assessment is contained in the NPD supporting documentation on the analysis of benefits and costs which is incorporated by reference in Section 8.1 of the Plan. This report concludes the benefits of success outweigh the risk of failure.</p> <p>Noting that DOC submits that it would voluntarily follow rules that assist in the eradication of these pests (submission 51.26), the risk of failure is further reduced.</p>	<p>not mentioned in the Plan is because Horizons does not contribute direct funding to these programmes (as opposed to the commitment to the eradication of Manchurian wild rice).</p> <p>Similarly it is not considered necessary for all NIPPs to be covered in the Plan.</p>

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Section 5.1.2; Section 5.6	51.26	DOC	The application of the good neighbour rule principles does not fit with the Good Neighbour Rules for this section. The rules in this section are more in line with other purposes of the Biosecurity Act. DOC would not object to following these rules voluntarily.	Review and revise the proposed Good Neighbour Rules to ensure that they are consistent with the NPD.	Accept, through removing Good Neighbour Rule for eradication species.	On advice from MPI that Good Neighbour Rules are generally unsuitable for the objective of eradication, the Good Neighbour Rule associated with eradication species has been removed.
Section 5.1.2; Section 5.6	93.19	MPI	The objectives in tables [5-5] and [5-7], should be consistent with the NPD's wording for the intermediate outcome "eradication". In addition this section does not comply with cl 4(1)(c)(i)-(iii) of the NPD.	Amend the text to better match the definition of "eradication" in the NPD. In order to comply with the NPD address the matters outlined in the submission (pg. 5).	Accept, through the changes set out below. The Objectives and Aims in Table 5-5 and Table 5-7 are aligned with the NPD requirement for geographic area, period over which the work will be done and intermediate outcomes.	
	93.25		[Proposed rule 5.7.3] is an action, not a rule.	Move this text from the rules to table 5.6 Principal Measures.	All eradication rules revised per advice from MPI (see above response to submission 51.26).	
28. Exacerbators and beneficiaries, and funding the Plan						
Section 8	46.19	Federated Farmers	Federated Farmers supports the funding contribution of the Plan being determined by identifying the exacerbators of the pests, and beneficiaries of the pest being controlled. We also support the use of targeted rates in relation to the exacerbator and beneficiary funding and the use of the general biosecurity rate to fund the Plan in relation to the "public good" that is derived from the delivery of the Plan. However, the information that is provided lacks the detail for Federated Farmers to make any further commentary in relation to whether the	That the funding for the Plan and Strategy is considered in conjunction with the Annual Plan process. That the threshold for pest rating is revisited, and revised to include contributions from landowners with over 1 ha rather than 4ha.	Note submission. The analyses of benefits and costs, exacerbators and beneficiaries and allocation of costs are incorporated into the Plan by reference. The analyses weighed cost attribution on degree of benefit and exacerbation.	The issue of Horizons' 4ha rating threshold is one that is best considered during LTP formation.

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			<p>funding allocation between the exacerbator/beneficiary/regional community is appropriate.</p> <p>It is noted that there is some emphasis in the proposed [Plan] (Page 65) that it will "enhance and protect the ecological environment, including natural ecosystems and processes, soil health and water quality by removing, reducing or managing the pest species that threaten them". It would be widely accepted that the general public benefit from pest and weed control in that this contributes to greater native biodiversity and the protection of significant indigenous vegetation and habitats as required by the Resource Management Act.</p> <p>We raise the following questions with respect to the funding of the strategy:</p> <ol style="list-style-type: none"> 1. We understand rating and funding decisions are determined through the Revenue and Financing Policy within the Long Term Plan and Annual Plan processes. How does Council justify making such decisions prior to consultation on the Pest Management Plan and Strategy? 2. How does Horizons ensure that forestry blocks, non-rated land occupiers and the five crown agencies identified as significant exacerbators and beneficiaries of the Plan will contribute an equitable share to pest control? 3. How does Horizons justify the allocation of funding for production pest plants at a rate of 60% contributed by 			

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			<p>farmers? Federated Farmers believes that any decision regarding funding must show a clear relationship between the allocation of costs to farmers, the degree to which farmers will benefit from the strategy, and their contribution to the need for such management. Any funding strategy must be consistent with the cost/benefit and contributor/exacerbator principles inherent in the Biosecurity Act 1993 and the Local Government Act 2002.</p> <p>Federated Farmers has previously called for transparency around the funding policy threshold for properties less than 4 ha for pest management rating. Pests do not respect rating boundaries between lots of 3ha and 5ha. This results in a severely stepped threshold depending on property size, which fails to reflect pest control need, cost or rating impost. Federated Farmers submits that the threshold should be revisited and a more transparent rating system for these properties developed in consultation with landowners.</p> <p>A 1 ha. size may be appropriate, but it is noted that lifestyle blocks also contribute to the pest management issue. Small blocks are often the breeding ground for pest species to occur, with landowners not aware of the risks associated with the spread of weeds.</p>			
Section 8	48.9	Forest & Bird	A significant exacerbator of pest plants is the owner and operator of the North Island Main Trunk Line, this needs to be reflected in the explanation of beneficiaries and exacerbators.	Include State Owned Enterprises in the list of exacerbators	Note submission. The analyses of benefits and costs, exacerbators and beneficiaries and allocation of costs are incorporated into the Plan	The analysis of exacerbators includes road and rail authorities, either generally as with other occupiers, or explicitly, depending on the pest and mode of spread.

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					by reference.	
Section 8	93.47	MPI	We cannot determine whether the section on funding complies with cl 6 of the NPD as the cost benefit analysis for the plan has not been provided. This information must be documented and made publically available. Further information must be provided on the determination of the proposed allocation of costs to determine if the plan complies with cl 7 of the NPD.	Ensure that the cost benefit analysis and cost allocation information is documented and made publically available.	Note submission. The analyses of benefits and costs, exacerbators and beneficiaries and allocation of costs are incorporated into the Plan by reference.	These documents are publically available on Horizons' website.
	93.49	MPI	[Proposal table 9-1] does not cover the NPD requirement to identify the 'extent' to which persons etc. are likely to benefit from the plan etc.	Amend table.	Accepted through removal of the table.	The analyses of benefits and costs, exacerbators and beneficiaries and allocation of costs are incorporated into the Plan by reference.
	93.50	MPI	Does the LTP cover the rationale for the allocation of costs as required under s 70(2)(c)(x).	Check that the LTP allocation of costs meets the requirements of the Biosecurity Act.	Accepted by checking that the LTP covers the rationale.	The rationale is also covered in the allocation of costs document prepared by Council officers and incorporated into the Plan by reference.
29. Exclusion Programme						
Section 5.1.1; Section 5.5	25.21	NZ Transport Agency	Please clarify whether Horizons inspections also include road verges and contact with the Transport Agency. Should this be the case then the MOU should capture this, including health and safety aspects of being on a state highway verge.	No decision requested.	Note submission.	This is a matter for further discussion with the NZ Transport Agency.
Section 5.1.1; Section 5.5	48.1	Forest & Bird	This programme is too inflexible given the 20 year timeframe for the [Plan]. Should unwanted pests outside the Horizons' Region expand their range, or arrive in New Zealand, but are not listed in the [Plan], Horizons should be able to undertake a small-scale eradication programme without the need to review the [Plan]. Section 100V of the	Add words to the effect that the Horizons' Exclusion Programme is guided by but not limited to the pests that have not yet established viable or persistent populations in the Region, at the time of writing.	Accept through revision of Section 5.5. That section now refers to the Exclusion Programme list not precluding Horizons from managing new incursions of other pests not listed in the Plan.	

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			Biosecurity Act does not make it compulsory to list all species to target. The key requirement is that control not inconsistent with national policy direction.			
Section 5.1.1; Section 5.5	93.18	MPI	The objective in table 5-2 should be consistent with the NPD's wording for the intermediate outcome "exclusion". In addition this section does not comply with cl 4(1)(c)(i)-(iii) of the NPD.	Amend the text to better match the definition of "exclusion" in the NPD. In order to comply with the NPD address the matters outlined in the submission (pg. 4).	Accept through the changes set out below. Statement 5.1.1 now aligns with the NPD statement of Exclusion Programme intent. The Objectives and Aims in Table 5-2 now align with the NPD requirement for geographic area, period over which the work will be done and intermediate outcomes.	
30. Exemptions						
Section 8.1	25.3	NZ Transport Agency	In Section 8.1 'Provision for exemption', someone may be exempt from any requirement from any rule of the plan. Exemption reason (b) 'regeneration of indigenous habitat, and (d) 'effective suppression of the pest through alternative management methods' allow scope for gorse and broom to be used as a nursery crop and part of natural succession of areas to native flora.	Reasons for exemption (b) and (d) in Section 8.1 are welcomed by the Transport Agency, however, further guidance should be provided around the exemption process and criteria if any, to meet the Section 8.1 exemption. Recommend that the term 'spread' be clarified and included in the Glossary.	Accept in part. A statement has been added to Provision for Exemption (in Section 8.1 Regulatory action) to highlight that an application for exemption must show how the provisions of s.78 of the Act can be met. There is also further information and detail included with respect of the exemption process.	Aspects of these submissions are operational in nature and can be the subject of further discussion with NZ Transport Agency.
	25.32		The Transport Agency welcomes Horizons realistic view on pest management and getting the balance between control, potential adverse effects and opportunities that controlling pest plants may bring. We agree with all exemptions listed from a to q, with a, b, d, and q likely to be of most relevance to the Transport Agency.	Amend Plan to provide more guidance around the exemption process is needed and how the different programmes will achieve best outcomes.	The term <i>spread</i> has been added to the glossary.	

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31. Feral cat						
Table 2-1; Table 5-20.	1.1;	Hoadley	Feral cats need to be controlled and eradicated for the mess they make and the effect on natural habitat / birds.	Add Feral Cats to the list of animals to be controlled. The purpose is to control cats and reduce adverse effects on economic well-being and the environment, namely the reduced loss of birdlife.	Note submission, with no changes to the Plan.	Horizons has opted to undertake site-led biodiversity programmes outside the auspices of the Plan.
Proposed Strategy Section 10;	10.1	Morgan Foundation	Wandering cats have an impact on native biodiversity through the predation of native birds, reptiles and insects. There is currently no clear means of determining if a cat is owned, stray, or feral. Microchipping and managing cats [for biodiversity outcome] brings side benefits such as good cat welfare and managing the economic impacts of diseases and parasites spread by cats.	Inclusion of Feral Cats into site-led management to achieve biodiversity outcomes. A clear definition of a Feral Cat to mean any cat without a microchip, collar, or harness. Microchipping of all cats within 1km radius of a defined sensitive wildlife area. Return of pet cats safely to their owners and other cats to be rehomed or humanely euthanised.	Submission noted, with support for inclusion of cats in site-led programmes. No change to Plan.	The implementation of the measures sought by this submission is better the subject of non-regulatory work, some of which is already contemplated by current programmes. Further, some suggestions (compulsory micro-chipping) may sit better with TAs as being similar to the registration of dogs.
Proposed Strategy Section 10; Table 2-1.	28.1; 29.1; 30.1; 31.1; 32.1; 33.1; 34.1; 35.1; 36.1; 37.1; 38.1; 39.1; 40.1; 43.1; 44.1; 45.1; 49.1; 50.1; 52.1; 53.1; 54.1; 55.1; 56.1; 57.1; 58.1; 59.1; 60.1; 61.1; 62.1; 63.1; 64.1; 65.1; 66.1; 67.1; 68.1; 69.1; 70.1; 71.1; 72.1; 73.1; 74.1; 76.1; 77.1; 78.1; 79.1	Various submitting by Form Submission.	These submissions followed a Form Submission. Together (in summary) the concerns are: Include Feral Cats as a pest to be managed and controlled in certain areas. Wandering cats are a problem due to the threats they pose to precious native wildlife. They spread of diseases such as toxoplasmosis, They cause a nuisance on my property.	These submissions followed a Form Submission. Together (in summary) the decisions sought are: Inclusion of Feral Cats into site-led management. A clear definition of a Feral Cat to mean any cat without a microchip, collar, or harness. This would allow cats to be legally managed in designated sensitive wildlife areas.	Note support for inclusion of cats in site-led programmes, but make no changes to the Plan. The submission effectively proposes that feral cats appear in the Plan, although only references the Proposed Strategy.	The management of feral cats at specific sites is a regional issue due to threats to biodiversity, but listing feral cats in the Plan is not considered necessary. Management initiatives are already provided for in specific project sites and can be catered for through operational plans reviewed by Council annually.

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			(Additional comments not included).	Approach the government to develop national legislation to allow cats to be managed like dogs.		
Proposal Section 2.1.2; Table 2-1; (A comment now removed from Plan).	46.16	Federated Farmers	Federated Farmers would like to see feral mustelids, Feral Cats and Koi Carp included in the Plan, as mentioned on page 14 of the [Proposal].	These pests should be kept in the Plan.	Note submission, with no changes to the Plan.	Horizons has opted to undertake site-led biodiversity programmes outside the auspices of the Plan.
Proposed Strategy Section 3.5.1.	48.15	Forest and Bird	Forest & Bird supports responsible pet ownership. We would expect Horizons to take a strong stance on stray and feral cats in response to its obligations as a signatory of the NPPA.	Make specific mention of the intentional release of unwanted cats into the region.	Note submission, with no changes to the Plan.	Horizons' commitment to cat management does not cover the realms of responsible cat ownership. Neither the National Pest Plants accord (NPPA) nor the National Pest Pet biosecurity Accord (NPPBA) cover domestic cats.
Table 2-1.	84.1	Wellington Fish and Game	These species should be included as pest in the plan. If these are included, it would give Horizons better mandate to work collaboratively with stakeholder agencies.	Include Feral Mustelids, Feral Cats, and Koi Carp in the plan.	Note submission, with no changes to the Plan.	The management of feral cats at specific sites is a regional issue due to threats to biodiversity, but listing feral cats in the Plan is not considered necessary. Management initiatives are already provided for in specific project sites and can be catered for through operational plans reviewed by Council annually.
	94.1	Ruapehu District Council	We would like to advocate for the inclusion of feral mustelids, koi carp and feral cats in this part of the [Plan]. An increase in koi carp and feral cats will have a devastating effect on native species and ecosystems.	Include these pests in the plan.		
32. Feral goat						
Table 2-1	13.5	Whanganui District Council and Whanganui Rural Community Trust	Over the last several years, wild goats have and continue to deplete vegetative cover within the Whanganui River Catchment. This is perceived to have a contributory influence on stormwater run-off which exacerbates flood damage during storm events. There is little scientific evidence of this but a working	That Horizons recognise the effects of Wild Goats in the Whanganui catchment. That Horizons work collaboratively with all agencies and the community to solve the issue. That more urgency be placed on	Note submission, with no changes to Plan.	Horizons' role best lies in the management of feral goats as threats to biodiversity and erosion at specific sites. Horizons has opted to undertake site-led

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			group has been formed and gained initial funding to research the subject. It is also recognised that goats have a disastrous effect on exotic plantations on hill country and biosecurity projects. The numbers of goats shot by various parties is mind boggling but there is no coordinated approach – which is understood to be Horizons' responsibility.	this concern than it has been previously.		biodiversity programmes to manage these animals outside the auspices of the Plan.
	92.2	NZDF	The rationale for including rabbits in the table also applies to, at least, hares, pigs, goats and possibly Canada goose. These species show similar pest characteristics as those listed for rabbits (Table 5-17).	Add hares, goats, pigs and possibly Canada goose to Table 2-1.		
33. Feral mustelid						
Proposal Section 2.1.2; Table 2-1; (A comment now removed from Plan).	46.16	Federated Farmers	Federated Farmers would like to see feral mustelids, Feral Cats and Koi Carp included in the Plan, as mentioned on page 14 of the [Proposal].	These pests should be kept in the Plan.	Note submission, with no change to Plan.	Horizons' role best lies in the management of ferrets, stoats, and weasels on native fauna at specific sites under site-led biodiversity programmes. Horizons has opted to undertake site-led biodiversity programmes outside the auspices of the Plan. Current national legislation for the management of pet or farmed ferrets is adequate for keeping these animals in captivity.
	84.1	Wellington Fish and Game Council	These species should be included as pest in the plan. If these are included, it would give Horizons better mandate to work collaboratively with stakeholder agencies.	Include Feral Mustelids, Feral Cats, and Koi Carp in the plan.		
	91.19	Waikato Regional Council	We support the inclusion of mustelids as site-led pests for biodiversity purposes but note that there may be occupiers who still (or might in the future) want to farm or hold ferrets. It would be helpful for Horizons to include wording from two Waikato RPMP rules to reinforce the general community concerns around holding mustelids for pet or farming purposes (rules quoted pp 21-22 of submission). We note should you wish to adopt these rules these animals may need to be reconsidered under Table 2-1 of the [Plan].	None – Horizons may wish to determine the level of risk in the region posed by mustelids.		
	94.1	Ruapehu District Council	We would like to advocate for the inclusion of feral mustelids, koi carp and feral cats in this part of the [Plan]. An	Include these pests in the plan.		

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			increase in koi carp and feral cats will have a devastating effect on native species and ecosystems.			
34. Feral rabbit						
Section 5.8.2	3.2	Harris	My primary concern is the rabbit population. The damage to plants (any newly planted trees etc.) and the scratching is extreme; I have never witnessed such damage in the 30 plus years on the property. The relevant measures of rabbit control are noted, but the current approach is ineffective. The good neighbour rule might work.	Rabbitier style approach.	Accept in part through amendments to the Good Neighbour Rule regarding rabbits for more specificity.	Horizons' role is to intercede where and when rabbit infestations begin to show signs of spread.
Section 5.8.2	5.3	Webster	These species are on the increase.	None sought.	Note submission.	Horizons' role is to intercede where and when rabbit infestations begin to show signs of spread.
Section 5.8.2	41.5	Land Information New Zealand	LINZ considers it is unclear what is deemed a 'level acceptable for reducing externality effects on neighbours and for reducing environmental damage' from feral rabbits.' As such the circumstances in which occupiers may be required to control or destroy rabbits, is unclear. LINZ considers that in the Modified Mclean Scale should be included. LINZ also considers it is unclear in section 2.1 when, where, or how occupiers are required to 'inform Horizons of the presence of feral rabbits.'	Amend to include a threshold level for when occupiers may be required to control or destroy feral rabbits – for example under the Modified McLean Scale. Amend to clarify when, where, and how often occupiers are required to inform Horizons on the presence of pests. This is also relevant for other species with the same rule requirement.	Accepted. To clarify the extent to which the Good Neighbour Rule applies, the Modified McClean scale (2012) has been included in the rabbit section in the Plan. Scale "5" (which contains the description "Infestation spreading out from heavy pockets.") has been used as the threshold for the rule.	The use of the index threshold called "infestation spreading" makes the rule consistent with the NPD expectations of Good Neighbour Rules (to manage the effects of the spread of pests). It also ensures that the rule is measurable.
Section 5.8.2	46.21	Federated Farmers	Federated Farmers is supportive of the management programme for the control of rabbits in the region. However, members have noticed increasing numbers of rabbits in the region. Federated Farmers believes greater investment needs to be made in tools and measures to control rabbits in areas where toxins are unable to be used.	That greater investments are made in tools and measures to be able to control rabbits where toxins are unable to be used.	Note submission.	Horizons remains involved in industry research for better tools to manage rabbits.
Section 5.8.2	51.34	DOC	In areas where Horizons undertakes	Clarify the outcomes and	Accepted in part.	Horizons' preferred role is

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			<p>rabbit control we consider the Good Neighbour Rule and the process proposed to enforce the rule, creates a potential conflict of interest. The occupier bears no cost (Horizons is not the occupier) and therefore the argument for Good Neighbour Rule becomes circular.</p> <p>We support biocontrol of rabbits.</p> <p>In our view, rabbit control operation undertaken by Horizons at selected sites valued for biological diversity etc. should be assessed with respect to the NPD under the intermediate outcome of “protecting values in places”.</p>	<p>objectives of rabbits and consider developing “protecting values in places” plans for this species.</p>	<p>Change Good Neighbour Rule to be more explicit (see above summaries). Also note the inclusion of the Modified McClean Scale, as described above.</p> <p>The duty to inform Horizons of the presence of rabbits to be removed as this makes no sense in areas where rabbit infestations are not an issue.</p>	<p>to intercede where and when rabbit infestations begin to show signs of spread. Site-led management as suggested by the submitter would not fit with this outcome.</p>
Section 5.8.2	91.17	Waikato Regional Council	<p>We support the general intent of rules that require occupiers to control rabbits. The slightly different approaches by the two councils are not inconsistent with one another.</p> <p>It is unclear from the overall requirement to act if Horizons is undertaking monitoring and compliance enforcement, or acting on complaint, or both.</p> <p>It is unclear from the Good Neighbour Rule to what level or measurable extent that control is required. Although there are issues with using the Modified McClean Scale, it is our view that it is better to have a level of monitoring to support policy direction.</p>	<p>None sought.</p> <p>It would be helpful for occupiers and readers to understand the extent of the programme.</p> <p>To make it clearer to occupiers who may be asked to comply with the rule, some measurement tool or method for determining acceptable rabbit control levels or thresholds should be considered.</p>	<p>Note submission.</p>	<p>Changes to Good Neighbour Rule address this submission, including the addition of the Modified McClean Scale as above.</p>
Section 5.8.2	92.2	NZDF	<p>Rabbits should not be on this list.</p>	<p>Alternatively remove rabbits from Table 5-17.</p>	<p>Disagree. Horizons identifies that there is a role for a regional council in regulating for controlling the spread of rabbits and providing for regulated release of rabbit calicivirus.</p>	
Section 5.8.2	92.9	NZDF	<p>NZDF supports the general approach to rabbit management in the Proposed</p>	<p>a. Include a target level in each aim and the concept of multiple</p>	<p>Accept in part.</p>	<p>A single threshold is simpler (than multiple target levels</p>

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			Plan, and makes the following comments: a. Aims: the aims discuss a single target level for rabbit populations. NZDF believes multiple density and/or distribution levels should be used to best support the different desired outcomes at different sites. If a single level is to be used its needs to be stated here. b. Principal measures: requiring notice of rabbit presence to council seems overly onerous and of little benefit given their widespread distribution.	target levels which are site dependent. b. Amend the principal measures so they recognise the widespread distribution of feral rabbits in the region.	The wide spread nature of the pest is recognised through removal of the proposed "duty to inform" of the presence of rabbits.	as suggested by the submitter) and the threshold chosen matches the intent of a Good Neighbour Rule (to manage spread). Note also the inclusion of the Modified McLean Scale, as above.
Section 5.8.2	93.43	MPI	To comply with the NPD, the plan must state what is intended to be achieved in the first 10 years of the plan.	As this objective refers to the plan duration, cl 4(1)(f) needs to be complied with.	Accept with changes to the "Aim" to include what is intended to be achieved in the first 10 years.	
Rabbit Good Neighbour Rule	93.44	MPI	[Proposed rule 5.20.1 appears to apply to all occupiers in the region. It is difficult to see how cl 8(1)(c) of the NPD can be satisfied]. Also the wording needs to be clearer about who can require the occupier to act.	We suggest the wording be made clearer about who can require the occupier to act.	Accept. The Good Neighbour Rule has been amended to include a threshold of infestation and buffer distance to be managed (to only manage spread). The words "when required to act" have been removed.	The rabbit Good Neighbour Rule has been shown to be consistent with the NPD. The requirement to act is embodied in the description of the programme rather than the rule.
35. Field horsetail						
Section 5.7.4	2.3	Frederikse	Horsetail rush continues to invade our land drain from the river bank, we try to control it each summer, but it would be great to have some kind of strategy to get it off the riverbank below our land.	[As indicated by original submission] "...some kind of strategy to get it off the [Whanganui] riverbank below our land."	Note submission.	Horizons continues to investigate alternative methods of effective control.
Section 5.7.4	5.1	Webster	The issue that initially prompted my submission is field horsetail. Most of the regions' productive land is at risk from this weed. I believe that those affected need to deal with the pest, and there are ways in which to control it, but constant vigilance is necessary. I am hoping my persistent spraying programme will hold my infestations at bay.	Retain the framework as proposed but increase efforts to manage the problem. Provide subsidised assistance for weed control.	Accept and support noted. Some changes have been made as a result of amendments to the Good Neighbour Rule and the Clear Land Rule.	

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			The successful management of this pest requires a coordinated regional approach with regional council support for a widespread multi-faceted approach.			
Section 5.7.4	13.1	Whanganui District Council and Whanganui Rural Community Trust	Field Horsetail poses a serious risk to the productive land within the Whanganui District environs. Also, using only clean roading aggregate within the region would significantly reduce the physical transportation and consequently the speed in which Field Horsetail will spread.	Field Horsetail should be included within the “eradication programme.” At the very least, the responsibility for identifying and progressively containing this pest plant should NOT be borne by the occupier but rather should be the responsibility of Horizons. Horizons should undertake an investigation into alternative options for extracting clean aggregate sources from the region and processes to ensure aggregate sources are ‘clean’ before relocation. Removal of aggregate from areas where Field Horsetail is present should require a resource consent.	Disagree in part. Some changes have been made as a result of amendments to the Good Neighbour Rule and the Clear Land Rule. The rules require that occupiers clear their land of small infestations (with a threshold given that Horizons believes is eradicable) and require that larger infestations be managed to avoid spread.	The currently known extent of field horsetail and limited control tools makes it too difficult to manage them as an Eradication pest (submission 13.1). They are however potentially containable pests and therefore better managed under Progressive Containment programmes than under Sustained Control (submission 81.7). Rules are a fair approach to maintain the focus on stopping the spread of this pest, while Horizons investigates alternative methods of control.
Section 5.7.4	19.2	Manawatu District Council	MDC fully supports the Landcare research and development in bioengineered weevil to control horsetail. MDC and Rangitikei District Council intend to submit to EPA in support of Landcare’s application to release the bioengineered weevil into districts to alleviate horsetail on the roadside and pastoral land.	None sought.	Note submission.	
Section 5.7.4	46.7	Federated Farmers	Federated Farmers supports the inclusion of Field Horsetail in the Plan. Members state that the weed is also prevalent in Horowhenua District and suggest that the text (page 41) is amended to read as such. Infestations since the June 2015 floods are evidence of the issues with plant pests carried down waterways during	That the program for Field Horsetail actively engages land owners, and control methods are explored.	Note submission. Horizons continues to investigate alternative methods of control and other planned approaches (such as a Pathway Management Plan) to manage sources and	The currently known extent of field horsetail and limited control tools makes it too difficult to manage them as an Eradication pest (submission 13.1). They are however potentially containable pests and therefore better managed

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			<p>flood events.</p> <p>Sixty percent of survey respondents disagreed that landowners should be responsible for the progressive containment of field horsetail. On the back of ineffective control of horsetail by Regional Council, District Councils, gravel extractors and contractors, farmers should not be now left to pick up the pieces. The program for field horsetail needs to involve actively engaging landowners and working pragmatically with landowners to control field horsetail.</p> <p>Members note that the current efforts to control field horsetail on the roadside are not working and their needs to be better plant and biological controls.</p>		vectors of spread.	under Progressive Containment programmes than under Sustained Control (submission 81.7).
Section 5.7.4	81.8	KiwiRail	<p>Yellow Bristle Grass and Field Horsetail has been added to Progressive Containment in the Plan.</p> <p>Field Horsetail is noted as widespread in the Wanganui, Manawatu/Rangitikei floodplains. The source of infestation is roadsides, fence lines and drains. Also noted is that it is extremely difficult to control.</p>	Consider moving Field Horsetail to Sustained Control.	<p>Disagree, but note valid concern about difficulty to control this pest.</p> <p>Horizons continues to investigate alternative methods of control and other planned approaches (such as a Pathway Management Plan) to manage sources and vectors of spread.</p>	The currently known extent of field horsetail and limited control tools makes it too difficult to manage them as an Eradication pest (submission 13.1). They are however potentially containable pests and therefore better managed under Progressive Containment programmes than under Sustained Control (submission 81.7).
36. Giant buttercup						
Table 2-1	46.15	Federated Farmers	Giant Buttercup is extensive in low lying country around Woodville and Pahiatua, in the Tararua. Federated Farmers submits that Giant Buttercup is included in the Plan, with occupiers responsible for progressive containment and the good neighbour rule enforced.	That Giant Buttercup is included in the Plan.	Note submission, with no change to Plan at this time.	Further investigation of this potential pest would be required and Horizons may opt to have this pest on the list of species to investigate for future Plans.

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37. Glossary						
Glossary	25.34	NZ Transport Agency	<p>The Transport Agency recommends including the following definitions of acronyms used in Section 3.1 that are not included in the glossary (Note: if only used once then no need however if used again these should be included): Regional BSP, Beneficiary, control, destroy.</p> <p>The Agency also recommends including a definition of 'spread' (Section 2.1.1), as this has certain implications for using pest plants for natural successions purposes e.g. does this mean to spread to neighbours or within an owners own property as well?</p>	Update Glossary with definitions for Regional BSP, beneficiary, control, destroy, and spread.	<p>Accept in part.</p> <p>With the exception of the "Regional BSP" (or Strategy) which is no longer referred to in the Plan, these terms have been added to the Glossary.</p>	
38. Good Neighbour Rules, Approved Management Plans, and Reasonable Measures						
All Good Neighbour Rules	5.5	Webster	Ensure that the good neighbour policy is fairly applied to all parties.	[Nothing specifically noted – the issue is the relief sought in this instance].	Note submission.	
All Good Neighbour Rules	7.1	Rangitikei District Council	Supports the "good neighbour" principle, but is concerned implications of implementation on a district with small population and large roading network.	Amend so that rule only applies (to territorial authorities) when landowners are actively managing pest plants on their property adjacent to roadsides.	<p>Accept.</p> <p>Revise the wording in the rule to include "Reasonable Measures" to describe what "actively managing pests" means.</p>	By defining "reasonable measures" the Plan ensures Good Neighbour Rules only take affect when the neighbour or nearby neighbour is managing the pest.
All Good Neighbour Rules	24.1	Paengaroa Road Old Mans' Beard Control Group	<p>The Good Neighbour policy is a commendable approach. Members of the public are taking more responsibility in reporting noxious weeds.</p> <p>The threat of damage from noxious weeds is not just limited to neighbours but also the natural environment, especially areas of native bush. This is of interest to people outside of farming who are concerned with aesthetic and environmental issues.</p>	That the Good Neighbour Policy extend to include members of the general public who find an infestation of a noxious weed on any property.	<p>Note submission.</p> <p>Any person can make a complaint about infestation of noxious weeds, however, the rule is only triggered in certain circumstances.</p>	Any person may make a complaint, and all occupiers are responsible for adhering to a rule that applies to them. However, only an Authorised Person can enforce a rule.
All good Neighbour	25.16	NZ Transport Agency	The first sentence suggests that the good neighbour rules apply only to a certain	Confirm good neighbour rules only apply to certain species,	Accept by confirming that Good Neighbour Rules only	Each Good Neighbour Rule specifically refers to the

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Rules			number of pest species.	amend first sentence in [Proposal] Section 4.4 to clarify, and link to [Proposal] Table 2.1.3.	apply to certain species. An explanation of the purpose of the Good Neighbour Rules is provided in a new section (Section 4.7) which identifies the rules only apply to certain pests.	pests or groups of pests to which the rule applies.
Proposal Section 4.4.2; All Good Neighbour Rules	25.17	NZ Transport Agency	With regards to the second bullet point down, how is it determined that the plant species is 'at such density that significant cost is being imposed on a neighbour'? For example, one individual plant may be a significant risk if it produces masses of long living seeds.	Clarify how it will be determined that the plant species is 'at such density that significant cost is being imposed on a neighbour'?	Accept. Every Good Neighbour Rule now includes a threshold of area of infestation or density of infestation.	The inclusion of the infestation threshold is important in clarifying the extent to which a neighbour is bound by the rule.
All Good Neighbour Rules	25.18	NZ Transport Agency	The good neighbour rules are likely to support pest management programmes that the Transport Agency will be undertaking as part of [Proposed] section 4.3.2.5. There does need to be more clear guidance around how these rules apply, and support to ensure best investment outcomes that achieve regional objectives.	Amend Plan to provide further guidance on implementation of good neighbour rule (as it applies to transport corridors?)	Accept. Every Good Neighbour Rule now includes a distance from the boundary.	The inclusion of a boundary threshold is important in clarifying the extent to which a neighbour is bound by the rule.
All Good Neighbour Rules	41.3	Land Information New Zealand	LINZ considers that 21 calendar days to control or destroy species required by Good Neighbour Rule 5.16.1 is insufficient. The ability to initiate action quickly can be constrained by LINZ's biosecurity budget, and the availability of contractors to complete work. Control works in some unallocated crown land may also require giving public notification through published advertisements and public meetings, which may cause delays.	Amend to increase the timeframe to control or destroy species in Good Neighbour Rule 5.16.1 from 21 calendar days to 56 calendar days.	Accept in part. Revise rules to include flexibility on timing ("...or as negotiated with an Authorised Person...")	There is some need for flexibility on timing, however it needs to be within the bounds of an agreed timeframe that is reasonable for meeting the objectives of the Plan. 56 days seemed too long when considering the objectives and purpose of many provisions of the Plan.
All Good Neighbour Rules	92.1	NZDF	The 21 calendar day timeframe specified for the occupier to control pests on their land is unrealistic in most cases. A negotiated timeframe would be more appropriate, and could take into	The 21 calendar day timeframe specified for the occupier to control pests on their land is unrealistic in most cases. A negotiated timeframe would be	Accept. Revise rules to include flexibility on timing ("...or as negotiated with an	

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			consideration the costs, extent, access, equipment/contractor availability, effects of seasonality on operational effectiveness, synergies with other work or pest operations, etc.	more appropriate, and could take into consideration the costs, extent, access, equipment/contractor availability, effects of seasonality on operational effectiveness, synergies with other work or pest operations, etc.	Authorised Person...")	
Proposed Section 4.4.2; Section 4.7;	42.2	Gordon	Currently the Complaints Received rule relies on neighbours actually knowing what a new invasive weed is and looks like. Non recognition continues to be a major issue even with weeds that are well publicised e.g. Old Man's Beard.	The complaints process needs to be widened to include members of the general public and that the mechanism needs to be signalled somewhere in the Plan or supporting material to give public confidence in the process. E.g. Use Weedbusters.	Accept in part. Remove the complaints procedure chapter. Complaints from the public can be managed on a case by case basis by authorised officers. Some guidance is still given as to enforcement processes in the Plan (section 7.1).	A complaint procedure is not a necessary requirement of the Plan and is deemed superfluous by the authors of the National Template for Regional Pest Plans.
Proposed Section 4.4.3(2)	42.3	Gordon	In many cases the only way of not inflicting "unreasonable cost" on neighbours is full eradication of the invasive pest plant at the point of origin. This needs to be signalled quite clearly. If we were to look at the "infestation curve model" in the CBA document "containing" a weed within a legal property boundary becomes very difficult once it gets to level 8, and so it is best to target property based eradication of weeds where practicable.	This point understates the need for action in many cases and should be re-written.	Note submission. Changes to the Good Neighbour Rules and the Clear Land Rule possibly address this submission.	The Decision Support Tool is to be removed in preference to more explicit Good Neighbour Rules and introduction of Clear Land Rules – see above.
All Good Neighbour Rules	46.5	Federated Farmers	Federated Farmers supports the principle of the good neighbour rule. We support the obligation that the Crown will now have to control pests. Federated Farmers views the introduction of the good neighbour rules as a key step to addressing the ongoing issue of Crown Land being non-rateable and not being required to directly contribute to pest management in a	That the Good Neighbour Rule is retained in the Plan. That Horizons will ensure that the absence of a fiscally viable remedy does not affect neighbouring landowners, by ensuring those with weed or pest infestations cover the costs of pest management on neighbouring land.	Accept in most part. Good Neighbour Rules retained and revised to be more explicit. Introduction of the "Approved Management Plan" concept to support alternative action that meets objectives of the	Noting that the removal of the Decision Support Tool Band biosecurity Risk Assessment Tool is contrary to this submission, but the amended Good Neighbour Rule and Clear Land Rule scheme should provide the clarity of purpose sought by this submission.

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			<p>region.</p> <p>Federated Farmers supports the move away from boundary clearance rules, to a program that is outcome focussed. While we acknowledge the efforts of Crown entities in undertaking pest management, we consider that the good neighbour rules will provide a higher level of certainty that the objectives of the Plan will be achieved.</p> <p>Federated Farmers in general supports the process articulated in Figure 4.1 of the Plan, compliant process and protocol for resolution. The Decision Support Tool provides a useful chart with which to assess pest impacts, and a clear pathway. We do however seek points of clarification:</p> <ul style="list-style-type: none"> • 1.7 notes the question "Is a fiscally viable remedy available?" Federated Farmers would not like to see this become an "out" for those who seemingly can't afford pest management. • In the Plan there is reference to unreasonable cost imposed on a neighbour or near neighbour. It is imperative that unreasonable cost is clearly defined. • Federated Farmers seeks clarity as to who will bear the cost burden of this new approach. • Federated Farmers seeks clarification as to what a Farm Biosecurity Risk Assessment includes and suggests it includes the economic and production impact of pests <p>Federated Farmers would expect that the risk of large scale land use change is</p>	That Horizons continues to seek an outcome focused approach to pest management, as outlined in the Plan.	rules and Plan, rather than offering an "out".	

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			considered in the Good Neighbour Rule process. In areas such as Ruapehu, where large tracts of production land may have changed to forestry, Tutsan has the potential to establish in forestry blocks and will therefore require active management.			
Proposed Section 4.4.2; Section 4.7	51.16 & 51.17	DOC	We support the concept of a process to support the resolution of pest problems between neighbours but consider that this section is not a good summary of S.8 of the NPD.	Adopt changes to this section as outlined in submission (pp7 -8).	Accept in part. Some of the suggested wording is incorporated into the revised good Neighbour Rules.	With the introduction of "Reasonable Measures" into the Good Neighbour Rules, the changes suggested by this submission have been supported in principle.
All Good Neighbour Rules	51.28	DOC	We consider that the good neighbour rule as it is worded is not consistent with the NPD. The approach needs to be coupled with a potential maximum obligation within the rule (e.g. a boundary control distance). A Good Neighbour Rule is only justifiable when the spread is imposing unreasonable cost on the adjacent/nearby occupier, but there is no trigger to determine this. The Good Neighbour Rule is only justifiable when the adjacent/nearby occupier is taking reasonable measures to manage the impacts, but there is not trigger to determine this.	Review and revise the proposed Good Neighbour Rules to ensure consistency with the NPD.	Accept. Revise all good Neighbour Rules to include "Reasonable Measures".	
All Good Neighbour Rules	51.36	DOC	Open ended statutory liability is not acceptable; <ul style="list-style-type: none"> The absence of guidance means there is no support to identify a fair resolution without Horizons' intervention; The terms and implications are not defined; The structure of the rules does not appear to meet the requirement of the NPD. <p>We consider that Good Neighbour Rules:</p>	Review the good neighbour rules and revise to ensure that they are consistent with the NPD as outlined in the submission (pg. 18).	Accept. The Good Neighbour Rules now include the terms and implications (threshold triggers and boundary distances), and provide flexibility ("Approved Management Plans").	The Good Neighbour Rules have been assessed in accordance with the requirements of the NPD. See section 4.7.

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			<ul style="list-style-type: none"> Contain the boundary rule distances that build in what is needed to bring any imposed costs to within what is reasonable; Contain triggers requiring the neighbour to be taking reasonable steps to manage the pest or its impacts; Have enforcement triggered by complaint; Include the flexibility of agreed alternative approaches on site. 			
All Good Neighbour Rules	51.9	DOC	Rules banning the sale and distribution of site-led pests are not the only means by which these pests can be managed. Good neighbour rule provisions can be used to help manage seed sources and buffers on adjacent land adjacent to site-led places could be of significant benefit to site-led programmes.	Include Good Neighbour Rule provisions for site-led programmes to address key risks to the success of these programmes.	Disagree. As there are no site-led programmes defined in the Plan, there are no Good Neighbour Rules of this nature.	Horizons has chosen to manage site-led programmes outside the auspices of the Plan.
All Good Neighbour Rules	81.6	KiwiRail	<p>KiwiRail supports the use of good neighbour rules for all stakeholders and occupiers, but is concerned that its relatively narrow rail corridor provides an unreasonable burden on KiwiRail compared with adjoining landowners.</p> <p>KiwiRail considers that pests should be controlled to a level that recognises a level of potentially achievable control appropriate to the effect on adjoining landowners.</p> <p>It would include control based on a complaints only basis for some externality effects created by pests. In addition, pest control would also be prioritised on high value sites and high priority areas through-out the region.</p> <p>Good Neighbour Rule 5.7.4 Notes that there are limitations as to the ability to access railway land associated with safety and operational</p>	<p>Retain the use of Good Neighbour Rules for all occupiers to manage externalities.</p> <p>[Proposed] Good Neighbour Rule 5.7.4 All occupiers who are aware of these pests on the land which they occupy have a duty to inform Horizons of the presence of these pests. The rule creates a trigger whereby an offence and penalties apply.</p> <p>Ensure that Good Neighbour Rules meet the National Policy Direction and the intent of Good Neighbour Rules</p> <p>Add to the principles set out in Section 4.4.3 Decision Support Tool: "The occupier of the land that is</p>	<p>Accept in most part through the changes set out below.</p> <p>Removal of proposed Rule 5.7.4 (an eradication Good Neighbour Rule).</p> <p>Rules revised to meet NPD.</p> <p>Rules now contain boundary distances and density or area thresholds.</p> <p>The concept of "Approved Management Plans" has been introduced to aid flexibility for difficult corridors – albeit it subject to the requirement that the intent and objectives of the Plan / rule are still met.</p>	Noting that other aspects of this submission are operational in nature.

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			requirements. This also involves significant economic consequences that would need to be considered.	<p>adjacent or nearby is taking reasonable measures to manage the pest or its impacts"</p> <p>Develop Good Neighbour Rules further to include for example a management response for specific pest plants that is triggered by complaints from neighbouring landowners and a reasonable threshold. That will enable a more flexible level of control to be exercised within which a pest would need to be controlled.</p> <p>Develop a process and transparent criteria for complaints and assessment of those complaints in collaboration with KiwiRail. This could be monitored through a register of complaints/response with appropriate checks and balances as to the legitimacy of complaints, effects, and actions required.</p> <p>Introduce a section to the Means of achievement: 'Biological control' and add:</p> <p>"Horizons will trial, introduce and release biological control agents as a management response for gorse and broom, nodding thistle and ragwort"</p> <p>Identify high priority areas within the rail transport corridor for pest management that adjoin regionally significant ecological</p>	Amendments to biocontrol references as outlined above.	

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				areas, high value sites and high priority areas.		
All Good Neighbour Rules	93.3	MPI	It is the general principle that rules should be clear enough that a person reading them would be reasonably expected to be able to identify if the rule applied to them. We have concerns about whether the good neighbour rules in the proposed plan comply with this principle.	Amend good neighbour rules in line with the guidance provided – refer to submission points.	Accept. Names of rules have been changed and include a description within the rule of those affected.	The Good Neighbour Rules have been assessed in accordance with the requirements of the NPD. See section 4.7
Duty to inform rules;	93.23	MPI	This [proposed rule 5.5.2] Good Neighbour Rule appears to apply to all occupiers in the region. It is difficult to see how cl 8(1)(c) of the NPD can be satisfied.	Refer to the NPD guidance table 10 in Chapter 5 that explains why Good Neighbour Rules have limited applicability in Eradication Programmes.	Accept through changes which see the rules shift from Good Neighbour Rules to Duty to Inform Rules.	The advice from MPI explains that, as Good Neighbour Rules are only used to manage spread, they do not apply well to being rules to support duty to inform.
	93.26		The same comments as for [sub# 93.23] apply [to proposed rule 5.7.4]			
Good Neighbour Rules 5.19.2, 5.22.1 and 5.24.1 respectively	93.39, 93.42, and 93.44 respectively	MPI	The summary and response to these submissions (which concern the wording of Good Neighbour Rules for the Un-mapped Progressive Containment Pest Plants, Possum, and Rabbit can be found under issues 70 (Progressive Containment category / approach), 68 (possum), and 34 (Feral rabbit) respectively.			
39. Gorse						
Table 5-9	25.27	NZ Transport Agency	Broom and gorse are included in the Progressive Containment Programme. The Transport Agency agrees Progressive Containment with the inclusion of the species, however, notes that both species spread their seeds by expelling, thus if boundary control is maintained they should not adversely affect neighbours. Also, both species can provide a nurse crop for native species if the conditions are right and the site is managed correctly. The Agency requests Horizons confirm that this approach to pest control (natural succession) is one that would be acceptable should a site be considered suitable.	Seeks clarification/confirmation that use of broom and gorse as a nursery plants is contemplated by the Plan in appropriate situations/sites.	Note submission.	This is a matter which could potentially be addressed through alternative action as contemplated by the plan in circumstances the objectives of the Plan can be met through alternatives.
Section 5.7.4	51.10 (part)	DOC	The objective of containing or reducing the geographic spread of these pests,	Develop sustained control objectives for these pests if a	Disagree.	The Approved Management Plan concept has been

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	92.2 (part)	NZDF	and the basic test that greater benefits accrue by attempting to control these pests under a Plan than not, may not be met. Placing broom and gorse into progressive containment rather than sustained control seems ambitious. The distribution and density of these species do not fit well with the criteria for Progressive Containment outlined in section 5.1.3 of the Plan but better meet the criteria in section 5.1.4 for Sustained Control and it would be beneficial to see more information on a cost-benefit analysis of these options.	positive CBA can be demonstrated, else do not include these species in the [Plan]. Place broom and gorse in a Sustained Control Programme.	The Analysis of Benefits and Costs shows that a Progressive Containment approach to halt the further spread of gorse and to eliminate small infestations is cost beneficial. The Good Neighbour Rule has been amended to include a specific distance to which boundaries need to be kept clear. This is based on the main ballistic distance of gorse.	introduced to provide some flexibility on the timing and extent of intervention needed, so long as the objectives of the Plan are met through the alternative methods agreed on for managing the pest.
40. Hare						
Table 2-1	92.2 (part)	NZDF	The rationale for including rabbits in the table also applies to, at least, hares, pigs, goats and possibly Canada goose. These species show similar pest characteristics as those listed for rabbits (Table 5-17). Based on the description of rabbits in Table 5-17 they would be better managed under a site-led control strategy.	Add hares, goats, pigs and possibly Canada goose to Table 2-1.	Note submission with no changes to the Plan.	Hares are best managed under habitat protection and restoration programmes on a site by site basis. These are undertaken outside the auspices of the Plan.
41. Health and Safety						
Proposed Strategy	47.4	Bushy Park Trust	The new Health and Safety Act will have direct implications for volunteer groups and individuals, including for use of toxins and machinery for weed control.	Include in the Strategy recognition of the Health and Safety requirements involved for volunteer groups / individuals and support from Horizons to meet the requirements e.g. running health and safety workshops.	Note submission with no changes to the Plan.	The important aspects of volunteer health and safety are addressed in site management arrangements and operational planning outside the auspices of the Plan.
42. Heather						
Table 2-1	92.2 (part)	NZDF	NZDF considers that the following additional plant species should be included in the Plan - crack willow,	Amend Table 2-2 and other parts of the Plan as necessary to include crack willow, Corsican	Note submission with no changes to the Plan.	The main issue with heather is its extensive planting and continued

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			Corsican pine, heather.	pine, vipers bugloss, and heather as pest plants, and give due consideration to also including lupin. Place broom and gorse in a Sustained Control Programme.		spread in Tongariro National Park and other lands administered by the Crown. Horizons may choose to manage heather as a biodiversity pest in sites on private land outside the auspices of the Plan. Horizons continues to participate in research into useful biocontrol agents.
	94.2	Ruapehu District Council	We would like to advocate the inclusion of heather in table 2.2. Heather is an invasive pest plant and needs to be controlled immediately. It has become an issue in National park and is starting to appear on Crown and Iwi lands such as Erua.	Include heather in the plan.		
43. Hedgehogs						
Proposal Table 5-17 (sustained control); Table 2-1;	48.8	Forest & Bird	Hedgehogs are overlooked environmental pests that have a significant impact on environmental values across New Zealand. Hedgehogs could be cost effectively reduced by including traps alongside the existing network of bait stations already present across the region for possum control.	Include hedgehog (<i>Erinaceus europaeus</i>) in Table 5-17.	Note submission with no change to the Plan.	Hedgehogs can be a significant threat to fauna in some places, however, the threat is best managed under site-led programmes which are outside the auspices of the Plan.
44. Ivy						
Proposed Strategy Section 10.5	42.6 (part)	Gordon	Include Sycamore in the tree section and common Ivy in the vines section if this is different from the "German Ivy" in the herbs section.	Include Sycamore in the tree section and common Ivy in the vines section if this is different from the "German Ivy" in the herbs section.	Note submission with no change to the Plan.	Ivy can be a significant threat to native forest remnants in some places. Any threat is best managed under site-led programmes which are outside the auspices of the Plan.
45. <i>Juncus acutus</i>						
Table 2-2	12.6	Ogle	Limited range at present (saline flats in Horowhenua –Manawatu), but forms dense swards over many hectares, must exclude natives and pasture grasses. Surely farmers and others complain about this weed as patches become larger and spread to new pastures?	<i>Juncus acutus</i> should be included in the Plan as a pest plant.	Note submission with no change to the Plan	There are commercial control options available as part of regular pasture maintenance programmes that can deal with this pest without the need for a regulatory approach. The biodiversity threat is best managed under site-led programmes which are

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						outside the auspices of the Plan.
46. Koi carp						
Proposal Section 2.1.2; Table 2-1; (A comment now removed from Plan).	46.16	Federated Farmers	Federated Farmers would like to see feral mustelids, Feral Cats and Koi Carp included in the Plan, as mentioned on page 14 of the [Proposal].	These pests should be kept in the Plan.	Note submission with no change to Plan.	Horizons' role best lies in the management of koi carp at specific sites with site-led biodiversity programmes. These site-led biodiversity programmes occur outside the auspices of the Plan. Previous inclusion of koi carp in the Pest Animal Management Strategy does not appear to have provided any further advantage to regulated management than that which is present under other legislation.
	84.1	Wellington Fish and Game Council	These species should be included as pest in the plan. If these are included, it would give Horizons better mandate to work collaboratively with stakeholder agencies.	Include Feral Mustelids, Feral Cats, and Koi Carp in the plan.		
	94.1	Ruapehu District Council	We would like to advocate for the inclusion of feral mustelids, koi carp and feral cats in this part of the [Plan]. An increase in koi carp and feral cats will have a devastating effect on native species and ecosystems.	Include these pests in the plan.		
47. <i>Lilium formosanum</i>						
Table 2-2	12.8	Ogle	The most wide-spread weed on Lord Howe Is; a no. of places on coast of NIs of NZ, incl. Foxton Beach and spreading quickly Is spreading rapidly now, including parks and private gardens in Marton, Whanganui.	<i>Lilium formosanum</i> should be included in the Plan as a pest plant.	Note submission, with no changes to the Plan at this stage.	Further investigation of this potential pest would be required and there is the ability to include this pest on the list of species to investigate for future Plans.
48. Lupin						
Table 2-2	92.2 (part)	NZDF	Lupin should also be considered (noting it is subject to concerted multiagency control, led by Horizons in the Desert Road area).	Amend Table 2-2 and other parts of the Plan as necessary to include crack willow, Corsican pine, vipers bugloss, and heather as pest plants, and give due consideration to also including lupin.	Note submission, with no changes to the Plan at this stage.	Further investigation of this potential pest is required, with the ability to elect to include this plant in the Plan at a future date.
49. <i>Lycopus europaeus</i>						
Table 2-2	12.9	Ogle	Invasive in L Taupo wetlands (Tokaanu	<i>Lycopus europaeus</i> should be	Note submission, with no	This pest is more widely

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			etc.); one local record, at Wai-inu Beach – needs eradicating now, and banning from propagation and sale. Now on Whanganui River banks e.g. below Georgetti Road; also in S Taranaki at Whenuakura R mouth as well as Wainuu.	included in the Plan as a pest plant.	changes to the Plan at this stage.	spread than anticipated by the submitter and therefore is unlikely to be able to be eradicated as suggested.
50. Madeira vine						
Table 2-2	12.3	Ogle	Having Madeira vine in the Strategy allowed me to put pressure on WDC to act on patches on lands they control, and they have eliminated some bad infestations and reduced others. Because it does not seed, I believe that Madeira vine could be eliminated in Whanganui, but it needs to be in the HRC Strategy to give Horizon's the ability and funding to work on it. Yes, it has become more common in the past decade, but that's because nothing was done to it by HRC. We need urgent action to make up for lost time.	Madeira vine should be included in the Plan as a pest plant.	Note submission, with no change to the Plan.	An investigation for this species under the Potential Pest Plant programme under the current RMMPS concluded that this species was best managed under site-led biodiversity programmes. Horizons undertakes site-led biodiversity programmes outside the auspices of the Plan.
51. Magpie and pukeko						
(none)	3.3	Harris	These species are on the increase.	None sought	Note submission.	No need to include these species in the Plan, as a regulatory approach is not warranted.
52. Memoranda of Understanding (MOUs)						
Section 5.3.5	23.1	Palmerston North City Council	PNCC supports the development of MOUs with other agencies to establish agreed levels of service.	None sought.		
Proposal Section 4.3.2.5; Section 5.3.5	25.20 25.7	NZ Transport Agency	Clarify how Section 5.3.5 works with Section 4.3.2.5 regarding the MOU between Horizons and the Transport Agency. An MOU between Horizons and the Transport Agency seems reasonable. The Agency will enter into an MOU to achieve value for money targeted pest plant management based on best endeavours. It is recommended that the MOU is formed by taking into	Clarify how Section 5.3.5 works with Section 4.3.2.5 regarding the MOU between Horizons and the Transport Agency. No decision sought on Plan. Provides guidance on potential MOU content.	Accept in part through the changes set put below. Section 5.3.5 is further expanded to provide guidance as to how MOUs can operate. The MOU wording associated with the description of NZ Transport	

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			consideration the Transport Agency's Relationship Proforma Manual (SM033). The MOU will cover the agreement on: 1. The best approach to pest plant control given the uniqueness of the land that the Transport Agency manages (long, linear, narrow and size). 2. Control measures to be implemented and a programme. 3. Monitoring (Transport Agency and Horizons), reporting and programme adjustments. 4. Rapid response (field assessment, eradication and		Agency (section 4.3.2.5 in the Proposal) has been removed in place of an expanded section on MOUs (as described above). Good neighbour rules have been revised with the inclusion of 'reasonable measures'. An explanation of 'reasonable measures' provides further certainty for users of the Plan.	
	25.8		An annual operation plan to which the Transport Agency agrees to be bound should hinge on Horizons ability to enforce the good neighbour rule on the Transport Agency's neighbours. The Transport Agency does not wish to be removing pest plants if our neighbours have no intention of controlling theirs satisfactorily. Satisfactorily is as per Section 4.4, that the Transport Agency is not incurring unreasonable on-going costs by a neighbour who is not doing the same. It is noted that there is no clear guidance as to what is meant by 'reasonable' and 'unreasonable'.	Clarification about how the Plan will deal with cross boundary obligations where Transport Agency neighbours are not controlling pest plants. Amend Plan to provide guidance/certainty on how 'reasonable' and 'unreasonable' will be interpreted.		
	25.9		The Transport Agency suggests that there should be a general MOU between the Transport Agency and Horizons and then there is an annual operation plan that is discussed with Horizons and agreed to yearly. This annual meeting and plan would state species to be controlled, where they are to be controlled, and best control methods as well as timeframes. A general programme can be set up in the initial MOU, however, there are significant benefits of meeting annually	No decision sought on Plan. Provides guidance on potential MOU relationship.		

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			to discuss and adjust if necessary.			
Section 5.3.5	46.6	Federated Farmers	Federated Farmers supports the efforts of Horizons Regional Council to undertake advocacy and education amongst the community. Farmers note what looks quite pretty at the start can often lead to significant infestations if not managed appropriately. Memoranda of Understanding with agencies must not result in them escaping the rule framework that private landowners are required to follow. Support a pragmatic approach, but do not at the expense of the objectives and the aspirations of the Plan. Any MoUs need to be transparent and publicly available for the community to view. Federated Farmers notes that increasingly the burden of responsibility for animal pest management falls on farmers. We are concerned that the Department of Conservation, Fish and Game and the urban and semi-urban population are currently failing to meet their obligations and responsibilities.	That Memoranda of Understanding will be used to develop pragmatic approaches to pest management, while not compromising the objectives and aspirations of the Plan, that all landowners, including the Crown and Territorial Authorities, have an active role in pest management. That any MoU will be a publicly available document to aid transparency.	Accept. Minor revision to Section 5.3.5 to further clarify that the outcome of MOUs is to record how the parties will be meeting the Plan objectives, and they must not compromise the attainment of the goals of the Plan. This was always the intent of the MoUs, it has just been made clearer. Minor revision to Section 5.3.5 to note that MOUs are publically available.	
Section 5.3.5	51.23	DOC	We support the concept behind these statements but note there is some conflict with the treatment of Crown agencies under S.4. of the plan. Good Neighbour Rule are not enforcement actions per se.	Review and revise this section.	Accept. Minor revision to Section 5.3.5 to further clarify that the outcome of MOUs is to record how the parties will be meeting the Plan objectives, and they must not compromise the attainment of the goals of the Plan. This was always the intent of the MoUs, it has just been made clearer.	The revision includes expansion on the matters that may be provided for in a MoU where the intent is to deliver pragmatic levels of service that achieve the objectives of the Plan.
Section 5.3.5	81.1	KiwiRail	Has not been involved in consultation during development. Can add value to	Engage with KiwiRail to discuss and agree on the most	Note submission.	.

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	81.9		<p>Plan by meeting and agreeing about practical responses that are capable of being undertaken within the operational requirements and financial means of the company.</p> <p>KiwiRail seeks an MOU that incorporates other significant species and allow for creative sharing of resources where responsibilities and outcomes agreed between Horizons and KiwiRail.</p>	<p>appropriate plan rules in relation to management of pests on the rail corridor, as part of developing the PPMP.</p> <p>The Council consults and collaborates with KiwiRail to develop workable plan provisions peculiar to KiwiRail's operational limits and unique circumstances, including an alternate management approach (such as a Specific Management Plan, MOU) as an agreed method of compliance with the PPMP</p> <p>Retain a Memoranda of Understanding (MOU) option for KiwiRail (to be discussed).</p> <p>Include in the Rules for relevant pest plant species the option to enter into MOUs that incorporate other species and allow for creative sharing of resources where responsibilities and outcomes are agreed on.</p>	<p>Rules to contain reference to Approved Management Plans as an agreed method of meeting the objectives of the Plan. Further discussions can occur.</p>	
53. Monitoring, duration and review						
Section 6.1; "Monitoring" component of each pest management programme; Monitoring and reporting inherent within rules.	7.2	Rangitikei District Council	Notes that independent annual inspections by roading authority and Horizons maybe a duplication of effort and costs.	Amend Plan to resolve seeming duplication between roading authority doing annual reviews of roadside pest plants and Horizons annual inspection of roadsides for pest plants. Suggests Horizons (which has the expertise) audit can be used by roading authority for future response planning.	<p>Accept in part through revision to monitoring sections as described below.</p> <p>The monitoring sections for each pest have been changed to ensure they match the aim for the pest and to remove any duplication of effort between the occupier and Horizons that may arise from the occupiers' responsibility to report on pests.</p>	While Horizons may conduct audits of roadsides, the obligation is on roading authorities to monitor the effectiveness of their management (via the rules).

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Section 1.4; Section 6.3	46.1	Federated Farmers	<p>Federated Farmers notes that the Plan has a duration period of 20 years with a review if "monitoring shows a significant change in the problems posed by pests or other organisms to be controlled covered by the Plan." It appears that such a review would have certain limitations.</p> <p>Federated Farmers has concerns that without a more formal interim review changes in the risks of pests may be overlooked and thus, exacerbated.</p> <p>An interim review that allows individuals and groups to provide input through a formal process would ensure a more complete rather than ad hoc approach to pest management in the Horizons Region.</p>	Federated Farmers submits that the monitoring of the Plan needs to include a formal interim review 10 years from it becoming operative.	<p>Accept.</p> <p>The 10 year review date has been added to Section 6.3.</p> <p>The start date and termination date has been included in Section 1.4 (Duration) as is required under the Act.</p>	<p>A start date, 10 year review date, and a termination date are aspects necessary for an effective Plan.</p> <p>The Plan is expected to start in the last quarter of 2017 but the exact date has not been determined. "During 2027" suffices for review.</p>
	46.17	Federated Farmers	<p>Federated Farmers supports the intention to continually monitor the effectiveness of the Plan, and report annually, however, the monitoring process also needs to ensure Horizons is able to respond to monitoring results without waiting for the next Plan to be realised in twenty years' time.</p> <p>For example, it is noted by members in the Wanganui region that pink ragwort has been found in the Whitiua Scientific Reserve south of Wanganui, and will soon be a significant threat regionally, as it is spreading without any control requirements. Horizons monitoring strategy needs to be further developed so that response can be made before eradication costs mount exponentially.</p> <p>The Plan needs to involve Horizons staff being trained to identify pests, rather than to only rely on a complaint basis.</p>	<p>That the monitoring strategy is adapted so it can respond to a gradual increase in threats, and be positioned to act before eradication costs mount exponentially.</p> <p>That Horizons appoint an Engagement Officer to provide immediate advice and knowledge on pest management incursions.</p>	<p>Accept in most part.</p> <p>The monitoring term "statistically representative" has been replaced with the more generic description of "surveillance" to better align the Plan with the current monitoring and reporting framework.</p>	<p>The monitoring section has been kept general to the main approaches Horizons will use to monitor the Plan to aid flexibility and enable adaptive monitoring responses to changes in pest abundance and extent.</p> <p>The current framework has a mix of mix of types of monitoring responses as appropriate for the species being monitored. It is difficult to provide the prescription for each monitoring programme for each pest in the Plan, some of which may be adapted frequently as new information comes to light.</p> <p>Horizons staff training on</p>

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			<p>Federated Farmers notes that in the previous Plant Pest Management Strategy, a response curve was identified, noting the benefit of responding to pest incursions at low levels of infestation. Federated Farmers would like to see greater recognition of this in the proposed Plan.</p> <p>In addition, Federated Farmers sees value in the appointment of an Engagement Officer. The role would be to respond to pest management queries and concerns, and assist and guide occupiers in engaging in immediate response. Where the occupier is unable to do so, we would hope that Horizons was able to step in before the infestation became a large issue, if necessary charging the costs back to the responsible party.</p>			<p>pest identification and monitoring is operational in nature and does not need to be in the Plan. Use of Engagement Officer is also operational in nature and is something to be explored with key stakeholders once the Plan is in place.</p> <p>The Infestation Curve is a concept that has been applied in the assessment of each species in the Plan and appears in the supporting documentation that attends the Plan. The inclusion of such concepts into the Plan to describe how decisions were made is superfluous.</p>
54. Mouse, Norway rat and ship rat						
Proposed Strategy Section 10.4	85.1	Predator Free NZ	These species should be included as pest in site-led management due to the effect they have on NZ's flora and fauna.	Include these species in the site-led management part of the document.	Note submission, with no changes to the Plan.	Noting that these submissions are directed to the Strategy, there may be opportunity to include mice and rats in site-led management programmes where their removal or suppression would reduce adverse effects on biodiversity. These are matters that sit outside the auspices of the Plan for now.
	91.21	Waikato Regional Council	We consider that the specific inclusion of ship and Norway rats to Table 3 is warranted and sends a clear message to regional occupiers that rats in particular and in tandem with stoats pose some of the greatest threats to the integrity of Horizons' top 300 biodiversity enhancement programmes.	Add these species as a new site-led pest to Table 3, section 10.4 of the [BSP] with an appropriate description.		
55. Mynah						
	9.1	Webb	Indian mynah individually, in small groups, and in large flocks have been a major pest at College Estate, central	Develop a strategy to remove the worst offensive groups of mynah in central Whanganui, with the	Note submission, with no change to Plan at this stage	Further investigation of this potential pest would be required and there is the

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			Whanganui. They are a continuous nuisance all day and they attack pets, small animals like hedgehogs, and birds.	assistance and cooperation of local residents to ensure maximum results in the shortest possible time with minimum expense.		ability to elect to have this pest on the list of species to investigate for future Plans.
56. National Policy Direction						
All relevant sections	17.5	Greater Wellington Regional Council	The [Plan] was largely developed prior to the release of the National Policy Direction and completion of the Collective RPMP Project.	It may be worth reconsidering the guidance of these documents during further development of the Plan.	Accept.	
Table 3-1	25.5	NZ Transport Agency	Note typo in table title – “compliance” vs “compliant”.	Suggest modifying the good neighbour rules - steps definition to make clearer as the current wording is confusing.	Accept. Table 3-1 has been revised to better describe the work undertaken to check compliance with each applicable Section of the NPD.	
Section 3.5	51.12	DOC	The NPD was released in August 2015.	Update this section to reflect this.	Accepted.	
	93.10	MPI	Implies that the NPD is still in development.	Should be updated to reflect the NPD was released 24 September 2015.	The Plan now reflects that the NPD came into effect on 24 September 2015	
Layout of Entire Plan	93.1	MPI	The plan is clear and well laid out. It largely complies with the NPD. We also appreciate your commitment to national programmes.	None sought.	Note submission.	
Table 3-1	93.11	MPI	The heading “NPD Requirements” in table 3-1 should be consistent with each direction for the NPD. The submission identifies certain requirements that may have not been met and suggests revisiting.	The Waikato RPMP in 4.2.3.3 and Appendix 4 is a useful model for how to do this	Accepted. Table 3-1 has been revised to better describe the work undertaken to check compliance with each applicable Section of the NPD.	
	93.12		The NPD clause number references need to be updated.	Change ‘clause 7’ to ‘clause 6’ and ‘clause 8’ to ‘clause 7’	The Plan now reflects that the NPD came into effect on 24 September 2015.	
Proposal section 4.4.3 (decision)	93.13	MPI	The NPD contains directions and compliance is required by the Biosecurity Act; we suggest this sentence be revised	Amend 4.4.3 as suggested.	Accept in part. Removal of the Decision	

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support tool); Section 4.7; All Good Neighbour rules;			to reflect that status.		Support Tool and replacement with more explicit Good Neighbour Rules solves this issue.	
Proposal section 4.4.4 (evaluation and ABC); Section 4.7; Analysis of benefits and Costs Supporting document.	93.14	MPI	Point 1 – we suggest the sentence read “In the absence of compliance with the rule, the pest...” Point 5 – we suggest the sentence read “Whether the cost... ..in the absence of compliance with the rule.”	Amend 4.4.4 as suggested.	Accept in part. Removal of the Decision Support Tool, more explicit Good Neighbour Rules, and further analysis of benefits and costs resolves the issue	
Section 5.1	93.15	MPI	Under the heading “Programmes and Attributes”, each programme differs from the NPD descriptions.	Update this section so each programme states the intermediate outcome that is written in the NPD so that it is consistent with the final version of the NPD.	Accept.	
57. Old man’s beard						
Table 2-2; Section 5.7.2	1.2	Hoadly	2015-2035 is enough time to eradicate old man’s beard completely.	Change old man’s beard from “progressive containment” to “eradication” (completely).	Disagree. The cost of effort required for eradication is presently beyond Horizons’ capacity to fund.	While the 2006 CBA identified that eradication was highly cost beneficial over the long term, the cost of achieving this outcome was beyond Horizon’s ability to fund it. This still remains the case.
	2.4	Frederikse	I have noticed old man’s beard is invading the hill slopes facing the river behind Aramoho, east of Brunswick Rd.”	None sought.	Note submission.	
	14.1	Rangitikei Environment Group	REG is disappointed in the lack of change to Old Man’s Beard control, considering their previous submissions. The question whether the Good Neighbour rules will be implemented significantly considering	That REG and Horizons work together to propose to Central Government a pilot project for Old Man’s Beard control in Upper Rangitikei, including the requisite	Note submission. Noting the change to the Good Neighbour Rule and the Clear Land Rule, the	Support noted. The submission also contains suggestions that are strategic and non-

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			<p>thresholds relating to “unreasonable losses” and “fiscally viable remedy”.</p> <p>The key to any successful long term plan is a massive increase in resources. REG fully understand Horizons not being able to raise this money through rates and believes the responsibility is Central Government’s.</p>	resources to match the magnitude of the problem.	Plan aims to further reduce the extent of this species.	regulatory in nature and further dialogue could be undertaken outside the auspices of the Plan itself.
Table 2-2; Section 5.7.2	16.2	Onderwater	Whanganui’s gullies are totally smothered in Old Man’s Beard and more emphasis should be put on its control as well as other invasive climbing invasive species.	Suggest that community groups are set up to take charge of “their” gully with support from Horizons and Whanganui District Council or DOC. This will also indirectly help with the control of other species such as woolly nightshade and wild ginger.	Note submission with no changes to the Plan.	This is a concept best considered as part of a non-regulatory approach.
Table 5-9	42.5	Gordon	Old Man’s Beards’ ability to spread into production areas seems to have been completely overlooked in both the Plan and associated economic analysis. In any production system that does not include intensive grazing by livestock, OMB can and will become a production limiting species that requires chemical control.	Amend status to Production Pest.	Accept with amendments to Table 5-9 to include old man’s beard in the production pest category.	The benefits and costs analysis gives consideration to the costs to production systems resulting from the effects of old man’s beard.
	42.7		No account has been made for percentage production loss from Old Man’s Beard. This is not true. In forestry and grazing retirement situations the cost will be in the long term failure of that enterprise which would have an associated cost. For pastoral farming in steep land environments where grazing intensity is not always even, the encroachment of Old Man’s Beard eventually leads to animals becoming trapped in infestations or tangled in some manner that leads to death.	No relief posed.		
Table 2-2; Section 5.7.2	46.8	Federated Farmers	Federated Farmers strongly suggests that further work needs to be done to plan for, and carry out, management of Old Man’s Beard. At present control	That Horizons develop a plan for the control of Old Man’s Beard, which seeks to protect the spread into reserves and forest	Note support. Noting the change to the Good Neighbour Rule and	The submission is strategic in nature and is something Horizons may consider as part of strategic

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			<p>mechanisms are piecemeal and there appears little structure to the management program.</p> <p>Federated Farmers' suggests that containment is required to avoid contamination through parks and reserves. Rather than working from the inside out, we would like to see effort to control the outer boundaries.</p> <p>Federated Farmers notes that the mapped good neighbour process zones will allow the extent of Old Man's Beard to expand in the Palmerston North City and Tararua regions. Previously in a control area, the Puketoi Range will no longer be protected by this program. Federated Farmers seeks clarification of the reason for the change in these boundaries and suggests that good work on behalf of landowners and Regional Council will be undone if these boundaries are to change. We need to continue battling where the battle has already begun, rather than see the removal of areas as a cost saving exercise.</p> <p>Federated Farmers would like to see increased investment in Old Man's Beard, while the cost of control is minimal compared to what it could become if the weed is left to decimate the region.</p>	<p>parks and controls the pest boundaries first and foremost.</p> <p>That Horizons seeks more Central Government funding for the Control of Old Man's Beard.</p>	<p>the Clear Land Rule, the Plan aims to further reduce the extent of this species.</p>	<p>implementation of the Plan but it does not require a change to the plan itself.</p>
Table 2-2; Section 5.7.2	48.4	Forest & Bird	We support Horizons' Progressive Containment Programme and would like to see ongoing collaboration with some of the key landowners through the Good Neighbour Rule.	Forest & Bird commends the work done to date by the Council, particularly with regard to old man's beard and wilding conifer control.	Note support.	Noting the change to the Good Neighbour Rule and the Clear Land Rule will further support the intent of this submission.
Table 2-2; Section 5.7.2	51.30	DOC	We support the inclusion of these species but recommend greater clarity of outcomes and objectives.	Clarify outcomes and objectives for these species.	Accept. There have been minor changes made to the	Support noted.

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					Objectives and Aims for the Progressive Containment Pest Plants to aid clarification.	
Table 2-2; Section 5.7.2	89.1	Howard	REG is disappointed in the lack of change to Old Man's Beard control, considering their previous submissions. The question whether the Good Neighbour rules will be implemented significantly considering thresholds relating to "unreasonable losses" and "fiscally viable remedy". The key to any successful long term plan is a massive increase in resources. REG fully understand Horizons not being able to raise this money through rates and believes the responsibility is Central Government's.	That REG and Horizons work together to propose to Central Government a pilot project for Old Man's Beard control in Upper Rangitikei, including the requisite resources to match the magnitude of the problem.	Note submission. Noting the change to the Good Neighbour Rule and the Clear Land Rule, the Plan aims to further reduce the extent of this species.	Support noted. The submission is strategic in nature and is something Horizons may consider as part of strategic implementation of the Plan but it does not require a change to the plan itself.
58. Objectives, aims and outcomes (general comment)						
Section 1.3; Table 5-2; Table 5-13;	11.5	Kahungunu ki Tamaki nui-a-rua	Management methods and / or the use of toxins should not cause unnecessary harm to non-target indigenous species.	In the "Outcomes" part of Table 5-2 and [proposal] Table 5-11. Add "and their management". "Native ecosystems are protected from the significant adverse effects of these pests and their management"	Accept. Suggested wording added to the outcomes in relevant sections of the Plan (including the Purpose (Section 1.3).	
	81.4	KiwiRail	It is particularly important that Horizons recognises the unusual practical challenges associated with managing pests along the national rail corridor, and the challenges of meeting the suite of rules proposed. An agreed management programme will provide KiwiRail with certainty for planning and operational purposes in a way that allows for progressive move towards achieving plant pest management outcomes. The management regime would provide for a progressive control over time.	Additional plan provisions (objective, policies and methods/rules) are developed to recognise the special nature of the rail transport network and those agencies to which an alternate management approach is a reasonable way of meeting the intent of the plan, within their operational limits and unique circumstances.	Accept in part. Add the ability to have "approved management plans" to the rule streams that affect rail authorities.	This approach is not intended to change the objective or outcome of the Plan, but provides flexibility in some cases as to how those same outcomes / objectives will be achieved.
Table 3-5; Section 5.2	93.16	MPI	The objective framework does not fully reflect the direction on setting objectives in the NPD (cl 4.1)	Update this section to better reflect what is now in cl 4(1), including cl 4(1) (d)-(e) which are	Accept.	

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				new clauses that have been added.		
59. Pampas						
Table 2-2	91.13	Waikato Regional Council	<p>We note 31 [named] pest plants that are in our RPMP and are not in Horizons' [Plan]. We have examined the non-alignment and find no significant cross boundary issues with two exceptions:</p> <ul style="list-style-type: none"> • Pampas; and • White bryony. <p>We request that Horizons actively engage with us on any site related issue raised by WRC specifically over pampas. We suggest that white bryony be included in your pest plan to ensure that, should there be funding cuts to MPI, Horizons can undertake management. Even if Horizons does not contribute funding, it is important to highlight to the regional community the complete list of high threat pests</p>	<p>For the majority of these plants, no relief is sought however these species should be on the regional council 'watch list' from each other's' perspective to ensure there are no gaps.</p> <p>None sought – this is an operational rather than a policy issue.</p>	Note submission, with no change to the Plan.	The requests presented in this submission can be addressed through operational approaches.
60. Peafowl						
Table 2-1	2.2	Frederikse	Peacocks are a problem at 721 Papaiti Rd and are increasing in numbers.	None sought	Note submission, with no change to Plan at this stage.	Horizons has previously investigated tools for peafowl control and identified that the tool set is very limited. Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to investigate for future Plans.
	5.4	Webster	Since the successful management of possums, the peacock population (whose eggs are no longer at threat from possums) is climbing rapidly.	Include Peafowl in the Plan.		
	13.4	Whanganui District Council and Whanganui Rural Community Board	For areas of the Whanganui District, Peafowl should be included with eradication being the goal within the proposed 20-year plan.	Peafowl should be included in Table 2-1 as a Pest Animal with "eradication" in the Parapara's, Whanganui River Road and Mangamahu environs.		
	46.15	Federated Farmers	Peacocks are cunning birds that eat a considerable percentage of their live weight per day. Federated Farmers submits that Peacocks are included in the Plan under total eradication, with occupiers responsible for their disposal.	That Peacocks are included in the Plan.		
	90.2	Jones	This species is everywhere in my area now. They are very aware and extremely	A strategy is needed to deal with this species.		

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			difficult to shoot. In my opinion they are at pest levels.			
61. Phoenix palm						
Table 2-2	20.1	Keys	Phoenix Palm is spreading in the urban and rural areas. It can seed down in the bush and is difficult to pull out by hand, even when small. The thorns on the frond are toxic and therefore dangerous to humans and animals.	Include Phoenix Palm as a pest plant.	Note submission, with no change to the Plan.	Horizons acknowledges the problems these submitters identify. However including the species as a pest within the Plan will not result in the outcomes sought through the submission. Rather the management of individual palms may be better approached through non-regulatory means.
	27.2	Eady	Phoenix Palms provide protection from predators for pigeons (which are a pest).	That Phoenix Palms be removed from the [Foxton Beach] area.		
62. Pig						
Table 2-1	92.2	NZDF	The rationale for including rabbits in the table also applies to, at least, hares, pigs, goats and possibly Canada goose. These species show similar pest characteristics as those listed for rabbits (Table 5-17). Based on the description of rabbits in Table 5-17 they would be better managed under a site-led control strategy.	Add hares, goats, pigs and possibly Canada goose to Table 2-1.	Note submission, with no change to the Plan.	Pigs are best managed under habitat protection and restoration programmes on a site by site basis. These are undertaken outside the auspices of the Plan.
63. Pigeon						
Table 2-1	3.3	Harris	These species are on the increase.	None sought.	Note submission, with no change to the Plan.	Including this species as a pest would not result in the outcomes sought through the submission. In localised areas pigeon
	27.1	Eady	Large numbers of pigeons congregate and breed at a fast rate in Phoenix Palms. There are health risks associated with these large congregations including several identified by The City of New	That the common [rock] pigeon be classified as having the same pest status as rooks.		

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			York.			droppings/nesting material can pose a potential risk to human health. This issue however falls outside the Plan and is the responsibility of the Public Health Units (PHU). Officers have confirmed that under section 29 of the Health Act, if a person believes an animal or plant is causing them potential harm, or is a nuisance, the PHU health officers will investigate and provide advice on options to remedy the situation. Often this is in conjunction with the district council health protection staff.
64. Pink ragwort						
Table 2-2	7.3	Rangitikei District Council	Observes that Pink Ragwort is becoming more prevalent in the District and a proactive management approach be considered.	Amend Plan to cater for proactive approach to pink ragwort expansion (Taranaki RC approach?)	Note submission, with no change to the Plan at this stage.	Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to investigate for future Plans.
	13.3	Whanganui District Council and Whanganui Rural Community Board	Pink ragwort is noted as being <i>“invasive in coastal areas, cliff faces, scrublands, river margins”</i> – all of which the Whanganui has large tracts of. Regional neighbour Taranaki Regional Council has identified pink ragwort as a pest plant.	Pink Ragwort should be included in table 2.1.3 as a “pest plant” rather than listed as a “potential pest plant”. Should Pink Ragwort not be included as a “pest plant” the Board asks what the future “tipping point” would be for its inclusion and what the process for inclusion would be. It also asks to be proactively engaged in future investigation on the status of Pink Ragwort.		
Table 2.2	21.1	Howard, Stewart, and Russell-Bowen	The only reason Pink Ragwort is not already a major environmental weed is because of the voluntary work of a small group over the past 6-8 years and they are coming to the end of their ability to	More action be taken by Horizons to control Pink Ragwort.	Note submission, with no changes to the Plan at this stage.	Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to

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	46.14	Federated Farmers	<p>keep doing this work. The group does not want to see Pink Ragwort get out of control while Horizons investigates further.</p> <p>Pink ragwort, or <i>Senecio jacobea</i>, is notably absent from inclusion in the Plan. Pink ragwort has spread across large areas in the region, in the Wanganui region spreading inland from the coast, to the extent that it is now established on steep bluffs and roadsides. It is also established on dairy run off ground, having the capacity to threaten pastures and placing agricultural production at risk. Members have raised concerns regarding Horizons lack of immediate attention to pink ragwort. We draw Horizons Regional Council's attention to the neighbouring Taranaki region, in which pink ragwort is identified as a pest plant species and landowners are required to clear the pest according to the boundary clearance principle.</p> <p>Federated Farmers submits that Horizons acknowledge pink ragwort as a production pest, and include pink ragwort as a pest to be managed under the progressive containment control programme.</p>	That Pink Ragwort is included in the Plan.		investigate for future Plans.
65. Plague skink (=Lampropholis delicata)						
Table 5-1	48.2	Forest & Bird	Horizons' Exclusion Programme should not be limited to this list. Outlying populations of plague skink occur at Whanganui, Palmerston North and Foxton Beach. Plague skinks pose a significant environmental threat to the region. Horizons needs to partner with the Department of Conservation and MPI Biosecurity New Zealand to eradicate these pests from the region as Auckland Council has done for the incursion on	Include plague skink (<i>Lampropholis delicata</i>) and Argentine ant (<i>Linepithema humile</i>) in Table 5-1.	Note submission, with no changes to the Plan.	It is acknowledged that plague skinks are a significant threat to native lizard populations and can assist the department of Conservation in its role as lead manager for this pest through education and advocacy. DOC can act without the species being identified in the Plan.

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			Great Barrier Island. Similarly, Argentine ants pose a significant threat to the region and are already in Whanganui, these need to be added to the list as well.			Education and raising awareness may be of value, and ants can be included in Horizons' biosecurity advocacy programmes.
Section 3.5 of proposed Strategy	48.13	Forest & Bird	This section needs to be expanded to include animal pests that are a high risk of transfer via the movement of plants and potting mix such as Argentine ants and plague skinks or plague skink eggs.	Include pest animals, Argentine ants and plague skinks, in the list of declared pests that Horizons Biosecurity staff are required to look out for while inspecting plant nurseries and retail outlets.		Horizons also supports continued development of best practice and supporting research as initiatives arise.
66. Possum						
Section 5.8.1; Table 5-21	2.5	Frederikse	"...we appreciate the possum control done by Horizons in the Papaiti area."	None sought.	Note submission and support.	
Section 5.8.1; Table 5-21	3.1	Harris	The possum population I can control through constant trapping. Not a concern for me.	None sought.	Note submission.	
Section 5.8.1; Table 5-21	6.1	Jeune	Possum control is a key service delivery (non-regulatory) function of Horizons. I support the continued control of possums in prescribed areas to ensure that they do not reach levels that cause externality impacts. I support the Good Neighbour Rules to control possums on Crown and rateable land.	Continue to undertake Possum control based on the public good benefits of this work to the region.	Note submission and support.	

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Section 5.8.1; Table 5-21	17.3	Greater Wellington regional Council	In Table 5-17 'Organisms on Horizons' Sustained Control Programme' possums are only listed as an economic and social pest.	It may be beneficial to include possums' environmental impacts as well.	Accept by adding "Environmental" status to the possum effects description.	
Section 5.8.1; Table 5-21	23.2	Palmerton North City Council	PNCC strongly supports the provision of Horizons assistance with possum control service delivery in selected sites valued for biological diversity. It also strongly supports developing site led biodiversity programmes under which the control of a range of animal pest species may be managed.	None sought.	Note submission and support.	
Section 5.8.1; Table 5-21	25.30	NZ Transport Agency	The road reserve may be used by possums to move from place to place. Most road reserves are narrow and any possum control occurring on neighbouring property is likely to be within the home range of any possum that utilises the road reserve. The Transport Agency can provide support to Horizons by working with Horizons to outline the relevant health and safety requirements when placing traps on Transport Agency land.	No decision requested, but offer to work with Horizons where appropriate	Note submission. The addition of the ability to have Approved Management Plans should address this submission.	
Section 5.8.1; Table 5-21; Section 8. Analyses of exacerbators and beneficiaries and allocation of funding.	(unlabelled)	Federated Farmers	Federated Farmers supports the inclusion of the possum in the Plan. We support the efforts of Horizons to maintain the low population density, including work to ensure the vast gains made in possum control are not lost as TB Free NZ exits control work in the Region. Federated Farmers is concerned about (lack) of management of possums on properties where the landowner has opted out of Horizons engaging in possum control on their land. Federated Farmers notes the Plan notes that possums are described as the number one animal pest in the region because of, amongst other things, the extent and severity of damage they	That Horizons continue to maintain the gains in possum control. That possum levels are monitored to ensure adequately low levels, in areas where landowners choose to engage in their own possum control. That possums are regarded as an environmental pest, in addition to being a production and social/amenity pest, and funded as such.	Note support. Changes made to the Plan are consistent with the decisions requested.	

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			cause to both production and environmental values" (page 59) but its status in the Plan is as a production and a social/amenity pest. Federated Farmers submits that possums should be also recognised as an environmental pest, and funded as such.			
Section 5.8.1; Table 5-21; Section 8. Analyses of exacerbators and beneficiaries and allocation of funding.	46.20	Federated Farmers	Farmers contribute to possum control through the levy to the Animal Health Board, tax to central government and rates to Councils. Farmers also do a substantial amount of good will work themselves. Federated Farmers would like more co-ordination to ensure they are not being asked to pay twice by both Council and the Animal Health Board to fund control of possums. The text on page 59 of the proposed Plan states that possum populations are destructive to indigenous ecosystems, for reasons including localised extinctions of possum preferred species, canopy dieback and ecosystem change. Federated Farmers submits that possums be identified as an environmental pest and funding for possum control by Horizons changed to a 100% funding using a uniform annual general change or targeted rate across all ratepayers.	That funding for possum control by Council is changed to a 100% funding using a uniform annual general change or targeted rate across all ratepayers, and possums are identified in the Plan as an environmental pest.	Disagree. The analysis of beneficiaries and exacerbators shows that there are specific farming benefits only attributable to farming and therefore the weight cannot be 100% attributed to the general community.	The approach taken to this aspect of the Plan was supported through analysis undertaken as per the NPD.
Section 5.8.1; Table 5-21	48.16	Forest & Bird	Forest & Bird comments Horizons for carrying out the Possum Control Operation and support the ongoing collaboration with Ospri and the TB Free NZ programme. We would also support further expansion into areas where the Department of Conservation is no longer resourced to manage.	Continue with the Possum Control Operation in the Horizons region with the aim of having all rateable land under programmed control by 2018.	Note submission and support.	
Section 5.8.1; Table 5-21	51.34	DOC	The proposed [Plan] for possums is poorly constructed with respect to objectives and intermediate outcomes as they relate to the values being protected. It is not appropriate to	Clarify the outcomes and objectives of possums and review the applicability to the Good Neighbour Rule under a full service delivery proposal.	Accepted through the changes set out below. Objectives and aims revised to match the	The approach taken to this Good Neighbour Rule was supported through analysis undertaken as per the NPD.

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			suggest that "today's level" is a meaningful target unless the desired outcomes are described. Because Horizons plans to undertake full service delivery for possum control on all rateable land, we consider the Good Neighbour Rule, that would only affect Crown agencies, and the process proposed to enforce the rule, creates a potential conflict of interest. The occupier bears no cost (Horizons is not the occupier) and therefore the argument for Good Neighbour Rule is circular.		sustained control category. Introduction of the targets for possum numbers within buffer distances defines scope of responsibility placed on occupiers.	
Section 5.8.1; Table 5-21	75.1	Philips	In the 2015 year I caught and killed 20 possums which is a jump on previous years. I submit that the plan to maintain current possum levels is not working. I fully understand the restraints on the available resources, but this is an ideal community in which to rally locals. A little encouragement from Horizons would go a long way toward people doing more possum control. I support the good neighbour ideas and would like this to be extended in an appropriate form to encourage everyone to take responsibility. A little bit done by everyone amounts to a great deal more than Horizons can hope to achieve for the level of rates people are willing to pay.	More public awareness and promotion – primary school talks and pamphlets. Encourage the public to see Horizons as the coordinators rather than the ones doing all the work. An annual possum shoot over a week or a month.	Note submission, with no changes to the Plan.	These are operational matters for consideration.
Section 5.8.1; Table 5-21	90.1	Jones	Continue the work done. It is nice not to have possums chewing through the orchard and roses.	Continue the programme	Note submission and support.	
Section 5.8.1; Table 5-21	91.16	Waikato Regional Council	a. We acknowledge the considerable undertaking of a possum Control Operation programme and the progress toward achieving region wide coverage. b. The [Strategy] contains a more detailed background and analysis of the	a. None sought. b. Include a cross reference in Table 5-17 of the RPMP to the more substantial background in the [BSP].	Note submission and support. Accept submission where change or clarity sought, as per below. The "Reasons for Inclusion" and a revision of 5.8.1 now	The content of the Strategy of most importance to the Plan included discussion on the objectives, target possum density and the benefits accrued. These are now better articulated in

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			<p>PCO.</p> <p>c. It is not clear what the purpose of the good neighbour rule for occupiers in the region if HRC intends to cover 100% of rateable land.</p> <p>d. We note an inconsistency over control targets between our RPMS and Horizons' RPMS. For the most part, the inconsistency is address by having [similar targets] in areas adjoining the Waikato region. We seek operational dialogue in areas where a policy inconsistency translates to on the ground discrepancy in WRC's Mokaiti PPCA.</p> <p>e. We wonder what long-term steps might be considered by Horizons for the inclusion of large tracts of non-rateable estate that has been formerly managed as Tb areas. These areas could harbour possum numbers that will jeopardise targets if reinvasion issues are not addressed.</p> <p>f. Recent changes to TbfreenZ's approach to vector management will likely see former Tb areas in the Ruapehu District needing to come into the PCO much faster than anticipated. Horizons needs to urgently plan for this eventuality and we urge that we collaborate as early as possible on this matter.</p> <p>g. Possums are a considerable environmental pest.</p>	<p>c. If the Good Neighbour Rule is principally drafted in relation to binding the Crown, then this point should be made clearer in section 5.19.1.</p> <p>d. None sought, but the issue need to be addressed by the parties and socialised with the ratepayers who share a common boundary.</p> <p>e. None sought.</p> <p>f. None sought.</p> <p>g. Add environmental pest to the status column for possums in table 5-17.</p>	<p>contain the salient detail.</p> <p>The Good Neighbour Rule has been written to bind all neighbours, including the Crown.</p> <p>Environmental pest has been added to the status column for possums.</p>	<p>the Plan and/or the supporting documentation that is incorporated by reference.</p> <p>The Good Neighbour Rules are now much more certain, and are intended to bind all neighbours. Of note is that those who chose to have Horizons undertake the PCO work on their land are already demonstrating reasonable measures. Anyone not demonstrating "reasonable measures" as defined in the Plan must ensure that the possum density within 200m of their side of the fence is low enough to reduce spread.</p>
Table 5-21	92.8	NZDF	<p>NZDF supports the general approach to possum management in the Proposed Plan, and has the following comments:</p> <p>a. Aims: two density thresholds are set</p>	<p>a. Amend the aims to set only one %BMI level, or include justification in the plan for the differing levels. Make the</p>	<p>Accept through changes below.</p> <p>Table 5-21 to include only</p>	<p>The specific diseases are listed in the analysis of benefits and costs that are included in the Plan by</p>

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			<p>for possums based on historical control programmes. This potentially introduces differential cost liabilities on land managers as maintaining possum at the lower level (15%BMI) will require greater resources than maintaining them at the higher level (40%BMI). There does not appear to be any information to justify this decision. This is particularly perplexing as possum residual densities are required to be lower on lands previously (but no longer) subject to Tb possum control, compared to the residual densities required on land not formerly subject to Tb possum control. If the Tb programme is no longer active what is driving the differential requirement? While the proposed levels don't appear to relate to current site values, NZDF believes multiple density and/or distribution levels should be used to best support the different desired outcomes at different sites.</p> <p>b. Aims: NZDF considers there should be an aim related to land with biodiversity values that are vulnerable to possums.</p> <p>c. Principal measures: requiring notice of possum presence to council seems overly onerous and of little benefit given their widespread distribution.</p> <p>d. Outcomes: it is unclear which diseases are at risk of transferring from possums to livestock, pets and humans, particularly in areas declared Tb free.</p>	<p>necessary amendments so that the densities in the aims relate directly to the outcomes.</p> <p>b. Insert a new aim for land with biodiversity values that are vulnerable to possums.</p> <p>c. Amend the principal measures so they recognise the widespread distribution of possum in the region.</p> <p>d. Specify the diseases the [Plan] refers to in outcomes, and support by including risk of transmission with and without pest control in cost-benefit analysis.</p>	<p>one possum density target.</p> <p>Biodiversity outcomes retained in Table 5-21.</p> <p>Environmental effects added to the description of the pest.</p> <p>Removal of the duty to inform Horizon in some circumstances.</p>	<p>reference. Specificity is not warranted in the Plan itself.</p>
Table 5-21	93.41	MPI	To comply with the NPD, the plan must state what is intended to be achieved in the first 10 years of the plan.	As this objective refers to the plan duration, cl 4(1)(f) needs to be complied with.	Accept.	
Possum Good	93.42	MPI	[Proposed rule 5.19.1 appears to apply to	We suggest the wording be made	Accept through revision to	The approach taken to this

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Neighbour Rule			all occupiers in the region. It is difficult to see how cl 8(1)(c) of the NPD can be satisfied]. Also the wording needs to be clearer about who can require the occupier to act.	clearer about who can require the occupier to act.	the Good Neighbour Rules. The Good Neighbour rules now include a threshold of infestation and buffer distance to be managed (to only manage spread). There is no longer a requirement for a person to be "required to act".	Good Neighbour Rule was supported through analysis undertaken as per the NPD. The requirement to act is embodied in the description of the programme, as opposed to the rule.
Section 5.8.1; Table 5-21	94.7	Ruapehu District Council	We acknowledge and support Horizons and TFreeNZ in managing the possum population. We would like to add heather to the 'Species Specific Programme' for the reasons stated above.	None sought.	Note submission and support.	
67. Privet						
Table 2-2	12.10	Ogle	Somewhat localised in region (mostly in Taumarunui district?); grows in shade. Serious weed in Waikato and northwards. Flowers cause allergies.	<i>Ligustrum lucidum</i> should be included in the Plan as a pest plant.	Note submission, with no change to the Plan at this stage.	Privet can pose a potential risk to human health in some circumstances. This issue presently falls outside the ambit of the Plan and is the responsibility of the Public Health Units (PHU). The issue can be addressed without Horizons intervention.
Table 2-2	23.3	Palmerston North City Council	Privet leaves and berries are poisonous to animals and people. Its pollen and scent is also believed by some to contribute to respiratory disorders such as asthma and hay fever. Privet is also an environmental pest, rapidly invading bush margins and waste areas. It can crowd out canopy trees in native forests, may impede native seedling germination and can eventually dominate an area of forest. Chinese privet can displace shrubs on the margins of native forests.	Include Privet in the Progressive Containment Programme list of species. This would send a signal that new privet trees should not be planted and that existing trees should be progressively removed.		Officers confirmed that under section 29 of the Health Act that Public Health Units can investigate species that are causing health issues and provide advice on options to remedy the situation. Often this is in conjunction with the district council health protection staff. The means by which

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						Horizons might consider non-regulatory approaches would be through annual operational planning.
Table 2-2	26.1	Bulloch	Previous submissions for control of Privet across the region have been rejected because of costs. This is not accepted as costs need not be borne by Council as individual landowners should excise control on private land. Adverse effects of Privet are: 1) It is an invasive weed 2) The pollen is a known antigen and it is especially bad for hay-fever sufferers or asthmatics. 3) The flowers give off a pungent, volatile odour. 4) The foliage and berries are poisonous. Farm animals can die after eating Privet and the berries are attractive to children.	That Privet (<i>Ligustrum spp.</i>) be added to the table of pest plants with Horizons being the agency responsible on public land and the occupier being responsible on private land.	Note submission, with no changes to the Plan at this stage.	Privet can pose a potential risk to human health in some circumstances. This issue presently falls outside the ambit of the Plan and is the responsibility of the Public Health Units (PHU). See response above. The issue can be addressed without Horizons intervention. The means by which Horizons might consider non-regulatory approaches would be through annual operational planning.
	26.2		<i>Ligustrum sinense</i> and <i>Ligustrum lucidum</i> are widely recognised as problems due to their invasive nature and effect on human health. Other <i>Ligustrum</i> species which are localised weeds include <i>L. vulgare</i> and <i>L. ovalifolium</i> and various hybrids. All the Privet spp. Have undesirable characteristics in term of human health.	If Privet species are not added to the list of Pest Plants under the Regional Pest Management Plan, we ask that all Privet species (as well as <i>Ligustrum lucidum</i>) be added to the table of indicative categories on page 129 [of the Strategy].		
	26.3		Plant pest species are designated production pests or environmental pests but there should also be an additional category for human health pests as many plants have toxic berries or other parts, or may cause allergies.	That a category of 'Human Health Pests' be included in the Plan and Strategy in addition to Production Pests and Environmental Pests status'.		
68. Progressive Containment category: objectives and approach						
Section 4.4.5; Section 5.3.5; Section 5.7	25.28	NZ Transport Agency	How will Horizons specifically coordinate the progressive containment approach? Will it be in collaboration with the Crown Agencies identified in Section [4.4.5]?	Clarify how Horizons will coordinate progressive containment approach and amend Plan to clarify relationship with Transport Agency if appropriate.	Note submission.	These are operational matters for further discussion with the NZ Transport Agency.
Section 5.1.3;	42.4	Gordon	Progressive containment and eventual	Line 4 and 5 of this paragraph	Note intent of submission	For some of the progressive

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Section 5.7;			population eradication should only be limited where factors that are “extraordinary” and that may well incur extraordinary costs or be potentially very injurious to human life. E.g. control of Old Man’s Beard in a deeply incised gorge where helicopter spraying is inappropriate or the unfeasible nature of trying to control field horsetail in the active part of a braided river channel.	needs to be rewritten so that emphasis of progressive containment and eventual population eradication is only limited by extraordinary factors.	but disagree with suggested change. The objectives and intent of the programme (to contain and reduce) must be relied on / identified in the Plan, as per direction of the Act and the NPD. These sections have been amended to better elucidate that Progressive Containment means to contain the pest and reduce infestations where feasible.	containment species, it might be possible to reduce infestations to the point that they are only confined to difficult to manage places. However, this is not the only outcome that a Progressive Containment approach will lead to and the description needs to remain broad enough to capture the intent of the containment approach.
Proposal Table 5-9; Proposal Table 5-10	48.5	Forest & Bird	The North Island Main Trunk Line is a significant source of pest plants and is potentially a corridor for travel of animals such as feral cats and mustelids. We would like to see inclusion of railway operators with a requirement to act regarding pest plants and animals.	Include a requirement for State Owned Enterprises to be responsible for control of infestations of pests and/or to be bound as a neighbour for the control of pests where they occur on land owned or operated by a State Owned Enterprise (e.g. Kiwirail).	Accept. Rules include KiwiRail where it is appropriate to nominate this agency.	There will be opportunity to work with Kiwirail to manage the progressive containment pests in the rail corridor.
	48.6		We would like to see the inclusion of a rule that covers not only roading authorities but also rail.	Include a rule c.f. [proposed] Rule 5.10.3 to include rail.		
	51.27	DOC	We consider that the programmes are poorly described in terms of the NPD definition and confusion is generated by the use of two terms that are not in the NPD. In our view the “good neighbour process” zone should be described as a “containment zone” (i.e. Horizons is trying to contain the pest to this part of the region), and the “active management zone” should be described as an “eradication / zero density” zone.	Review and revise the description of progressive containment to ensure that it remains consistent with the NPD. Consider moving aquatic plants to sustained control. Review and revise the proposed programme in light of the risk of not achieving eradication within the “zero density” part of the program area.	Accept in part. Progressive containment description has been revised to be consistent with NPD. Similarly, the objectives and aims of aquatic pest plants now better align with progressive containment.	The description of the zones are apt for the programmes and should be kept as is. Changing the names of the zones as suggested would be just as confusing; noting that ‘Eradication’ is a specific programme type under the NPD.

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			Aquatic plants may be better placed in “sustained control” programmes. Note that Crown agencies are not always responsible for managing pests on public estate. Note also an apparent intention to apply the Good Neighbour Rule to manage pests inside and outside active management zones. Note that limiting control by the Crown only to achieve Good Neighbour Rule is not likely to achieve eradication / zero density inside the active management zone. Horizons will need to seek the collaboration of Crown agencies to a greater level that required by the legislation.			The comment regarding the occupancy of Crown lands is noted. Horizons will work with DOC to attain practicable levels of service that help achieve the objective (to <u>contain</u> and reduce).
Section 5.7.2; Table 5-13	51.30	DOC	We support the inclusion of Darwin’s Barberry, Evergreen Buckthorn, Grey Willow, Moth Plant, and Old Man’s Beard but recommend greater clarity of outcomes and objectives.	Clarify outcomes and objectives for these species.	Accepted. The objectives and aims in Table 5-13 now better match the progressive containment objective of “contain and reduce”. The introduction of Section 5.7.2 better describes what the “Other Mapped Progressive containment Pest Plants” programme involves.	The addition of thresholds for the eradication of small infestation and boundary distances for large infestations also helps to better define the scope and scale of this programme as it relates to occupiers.
Section 5.1.3; Section 5.7 and associated tables.	81.10	KiwiRail	Notes that because almost all pest plants, but one, sit within the Progressive Containment class, it creates an expectation of zero density for some species which is an unrealistic “control and destroy” requirement on owners and occupiers in respect of their presence. It is Eradication by another name. Notes that the text acknowledges that total eradication is not a cost effective option. For the Mapped areas it appears that	Delete “Progressive containment involves proactively controlling pests to zero-density in parts of the Region where this is possible, and to actively containing them so that they do not spread further.” Replace with “Progressive Containment seeks to contain or reduce the geographic distribution of the subject to an area over time” Remove reference to “zero	Accept with changes to the introduction to section 5.7. Progressive containment is now described consistent with the NPD. Aims revised to “reduce”. All rules now recognise “contain and reduce” intent rather than “eradication”.	Revision of the rules now results in a more practicable course of implementation, but retains the intent to contain and reduce the incidence of progressive containment pests. There will be opportunity to work with Kiwirail to manage the progressive containment pests in the

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			possibly Boneseed, Evergreen Buckthorn, and Grey Willow may be suited to a zero density outcome. The remainder have a wide geographical spread and are well established and more suited to progressive (not zero density) and sustained control. [The proposed] Good Neighbour Rule 5.10.1 timeframe is not workable for the railway network.	density” from the Aims or relocate relevant plants to another outcome category (Eradication) [Proposed] rules Table 5.10 and table 5-14: Delete or rephrase Eradication Rule 5.10.5 Delete or rephrase Eradication Rule 5.14.6 Review Good Neighbour Rule 5.10.1 timeframe in relation to the railway access.	The corridor rules and Good Neighbour Rules now include the use of Approved Management Plans.	rail corridor..
Proposed rule 5.16.2; Revised rules in the tables in Section 5.7.	81.11	KiwiRail	It is unclear what the purpose is of the One Plan Target Catchments and the location and extent of them – including the extent of gorse and broom and costs incurred to meet the requirements. It appears this has been established for a different purpose. There are benefits with gorse and broom especially as a nurse crop in areas where there are topographical constraints.	Remove Aim “To reduce excessive nitrate losses from expansive areas of gorse and broom in One Plan Target Catchments.” Explain the adverse effect and how this addresses Biosecurity Act Section 54 (a). Also provide a cost benefit analysis of this. Delete Eradication Rule 5.16.2	Accept. The analysis of benefits and costs mentions the effect on water quality, but an empirical analysis cannot be performed due to lack of information.	That leguminous plants contribute to water quality issues is known from research, but there is insufficient regional information with which to guide a rule that would directly lead to a better water quality outcome. The revised aims and rules are expected to contribute positively to water quality outcomes (as they seek to reduce current extent).
Table 5-13; Table 5-14.	91.11	Waikato Regional Council	We note some pest plants such as grey willow where there is no alignment and which could present issues in the future for either council. Grey willow is in both plans but in different categories. If Horizons intends to act on on-farm assessments for grey willow, which impact on joint regional neighbours, we request early notification so joint communications can be planned.	None sought – this is an operational rather than a policy issue.	Note submission.	Retaining close ties with neighbouring regional councils will be critical to the success of the Plan.
Section 5.7.	93.20	MPI	The objectives in [Proposal] tables 5-9, 5-10, 5-11, 5-13, and 5-15 should be consistent with the NPD’s wording for the intermediate outcome “progressive	Amend the text to better match the definition of “progressive containment” in the NPD.	Accept. The introduction to Section 5.7 is now consistent with	

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			containment".		the NPD. The objectives and aims in the appropriate tables of Section 5.7 have been revised.	
Table 5-12 and references to Statutory Obligations 52 and 53	93.32	MPI	This para summarises ss 52 and 53 of the Act.	We recommend that the wording if the section be set out in full if this intended to show people what the requirements are.	Accept. The rule now prevents dispersions of aquatic pests, with a note regarding the Act section 52 and 53 requirements.	Note that the changes made resolve the issue, but were not made exactly as submitted.
Table 5-11; Table 5-13; Table 5-15; Table 5-17.	93.38	MPI	To comply with the NPD, the plan must state what is intended to be achieved in the first 10 years of the plan.	As this objective refers to the plan duration, cl 4(1)(f) needs to be complied with.	Accept. All objectives and aims now include a statement of what is expected to occur over 10 years of the Plan.	
Proposed Good Neighbour Rule 5.16.1; (Now Good Neighbour Rule 5.19.2).	93.39	MPI	Refer to Good Neighbour Rule guidance document Table 9 as regards Progressive Containment - to comply with cl 8(1)(c), this rule should only apply within specified zones rather than applying to the entire region.	The wording needs to be clearer about who can require the occupier to act – is it an authorised Horizons staff member?	Accept. The Good Neighbour Rule includes a threshold of infestation and buffer distance to be managed. There is no longer a requirement for a person to be "required to act".	By adding a buffer distance, the "zone" is specified in the rule. A check of the revision of the Good Neighbour Rule for non-mapped Progressive Containment Pest Plants shows the rule is consistent with the NPD. The requirement to act is embodied in the description of the programme rather than the rule.
All relevant tables and sections noting Service Delivery	94.2	Ruapehu District Council	The responsibility for the management of progressive containment pest plants such as broom, tutsan, and wilding conifers should also include Horizons. Horizons' involvement in the containment of tutsan is vital as a	None specifically sought.	Note submission. The Plan retains the same commitments to Service Delivery of Horizons as the management agency.	

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			regional and local level.			
69. Progressive Containment: List of plants						
Section 5.7; Map 5-4	51.29	DOC	We are unclear as to why a significant area of natural, productive and amenity value (Rangitikei River to Turakina) is excluded from the active management zone.	Review the objective for boneseed and revise if necessary.	Note submission, with no changes to the Plan.	Within the Good Neighbour Process Zone (excluded area) there are entrenched infestations that are (predominantly) on non-rateable lands. Horizons is relying on the occupiers to manage the spread of the pest in this zone.
Section 5.7; Table 5-9.	51.33	DOC	We consider that the suite of pests identified do not have the similarity of distribution, impact, or spread mechanisms that allow them to be grouped and therefore this plan is inconsistent with the NPD.	Exclude blackberry from the [Plan]. Exclude yellow ragwort, gorse, and broom species from the [Plan] except for provisions relating to bio-control. Form specific plans for the progressive containment (including pathway plans) for field horsetail and Tutsan.	Accept in part, although disagree with the comment that the species cannot be grouped in the Plan. The biosecurity risk assessment tool has been replaced with more explicit rules.	The NPD analyses attending the Plan the found that these species cannot be grouped for some of the analytical aspects of Plan formation, and so they were treated separately. However, this is a different matter to how they are presented in the Plan which is based on the similarity of objective. Pathway management plans could be useful. However, in the absence of these plans, tutsan and field horsetail should be retained in the Plan for now.
70. Purpose and strategic background						
Section 1.3	11.1	Kahungunu ki Tamaki nui-a-rua	Management methods and / or the use of toxins should not cause unnecessary harm to non-target indigenous species.	Amend the purpose slightly at 1.3: <i>"Minimise the actual or potential adverse or unintended effects associated with those organisms and their management; and..."</i>	Accept.	
Section 1.3; Section 5.1.5;	25.1	NZ Transport Agency		We recommend including 'protecting values in places' as a purpose of the plan.	Note submission. See issue 75 for response	The term "protecting values in places" is sufficiently covered by the purpose to

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					regarding Section 5.1.5.	"reduce or eliminate" adverse effects. Introducing the terminology in Section 1.3 might be confusing since Horizons is not using the Plan to undertake the Protecting Values in Places category of pest management
Section 1.3	51.5	DOC	The purpose statement incorrectly interprets the purpose of the Biosecurity Act, and putting more weight on the good neighbour principles.	Revise the representation of the reason for having a [Plan] to correctly represent the legislation.	Accept. Section 1.3 is now more aligned with the purpose of the Act.	
Section 1.3; Section 3.1	91.2	Waikato Regional Council	We note that the strategic background covers the typical legislative background and note the inter connections with other regional plans and initiatives. However, there are no over-arching objectives for the regional biosecurity programme. One of the most significant positive initiatives that Horizons is looking to introduce is the concept of on-farm biosecurity assessments. This is a possible game changer for the management of some long established pests. We suggest some upfront guiding principles for pest management in the region to set the tone for the Plan (and Strategy). Section 3 would strongly benefit from having an outline of key influences or drives for Horizons' pest management future.	Include examples of key influences or drivers in this section (identified pp. 3-4 of submission) – note, these statements are drawn from Waikato Regional Council's own high level policies in Section 3.2.	Note submission and accept in part. Section 3.1 records that collaborative relationships are a key driver for the Plan.	The Plan contains much of the content suggested in this submission. Efforts have however been made to make sure that the Plan remains reasonably consistent with the regional template.
71. Regional pathways						
Proposed Strategy Section 3.4.5	23.4	Palmerston North City Council	While PNCC supports the intent of the proposal to prevent pest dispersal through transport corridors it has concerns regarding the potential operational implications from the	It appears that actions to reduce the spread of weeds on road reserves are largely focussed on mowing and spraying. These are only two aspects out of the six	Note submission, with no changes to the Plan.	These are operational matters that may be addressed through further discussions with PNCC.

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			<p>proposed implementation measures. PNCC focus for road maintenance in rural areas is generally related to safety regarding sight lines and fire risk. Additional compliance costs may result in a reduced level of service.</p> <p>The proposal to require cleaning of mowing equipment is likely to add significant cost and require monitoring. Due to isolation it may not be practical to clean mowing equipment onsite before progressing elsewhere.</p>	identified as mechanisms of pest dispersal.		
Proposed Strategy Section 3.4.5	25.10	NZ Transport Agency	<p>Further detail on machine hygiene is provided in the supporting document entitled "Regional Biosecurity Strategy and Programmes (2075 to 2035): A document supporting the Horizons Regional Pest Management Plan", hereafter referred to as 'the supporting document'. The Transport Agency wish to continue working with Horizons and others to help develop best practice guidelines on machine hygiene.</p>	No decision requested.	Note submission.	This is an operational matter that may be addressed through further discussions with NZ Transport Agency.
	25.35		<p>The Transport Agency would be interested in continuing to be involved in discussions regarding machinery weed hygiene.</p>			
Proposed Strategy Section 3.4.4.	25.36	NZ Transport Agency	<p>The Transport Agency recognises that pest plants and animals (e.g. rainbow skink) can be introduced to new areas through infected supplies being brought in. The Transport Agency addresses this through the Agency's landscaping requirements provided in P39 – Standard specification for highway landscape treatments within the Transport Agency's Landscape Guidelines.</p>	No decision sought on Plan. Provides some helpful guidance on implementation.	Note submission	
Proposed Strategy Section 3.4.3.	48.12	Forest & Bird	<p>Inappropriate dumping of green waste can be prevented by working with TLAs to provide a free disposal and/or collection service. Personal responsibility and awareness campaigns are less</p>	<p>Include words to the effect that free disposal and/or collection services for green waste are provided in addition to an awareness campaign.</p>	Note submission with no changes to the Plan.	Should this suggestion be considered further by Horizons, it would be a non-regulatory measure and therefore would not appear

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			effective when personal expense is involved. Horizons needs to talk to all of the district and city councils to ensure a free service is provided to prevent further illegal dumping.			in the Plan.
Proposed Strategy Section 3.4.5.	48.14		This section lists roads, rail, navigable rivers and stream and river banks as dispersal corridors but only provides a strategy for how to tackle the spread of pest plants along roads. In addition to a strategy for roadside reserves, a similar strategy needs to be included to address the issue of rail verges and the spread of weeds down waterways.	Include a strategy to address pest dispersal through ALL transport corridors, specifically rail and waterways.	Note submission. Rail has been addressed through rule changes, while Good Neighbour Rules may reduce the effect of waterway transportation (e.g. keeping stream boundaries clear.	
Section 3.1	91.3	Waikato Regional Council	We support the intent regarding effective and efficient pest management between neighbouring regions by ensuring the majority of policies (aims and objectives) and not inconsistent.	None sought.	Note submission and support.	Pathway management plans in collaboration with other regional councils will assist in reducing the risk of pests spreading from one region to another.
	91.4		We are pleased to see education and awareness of pathways being promoted through the [Strategy]. Provisions for pathway management could be strengthened through further consideration of pest pathways and the potential use of pathway management plans.	An additional comment is sought in [Plan] Section 3.1 that captures pathway management (identified pg. 5 of submission).	Accept. Wording in the subsection headed "Neighbouring Regional Councils" has been revised as per this submission.	
72. Road corridor management						
Section 6.1; "Monitoring" component of each pest management programme; Monitoring and reporting inherent within rules.	7.2	Rangitikei District Council	Notes that independent annual inspections by roading authority and Horizons maybe a duplication of effort and costs.	Amend Plan to resolve seeming duplication between roading authority doing annual reviews of roadside pest plants and Horizons annual inspection of roadsides for pest plants. Suggests Horizons (which has the expertise) audit can be used by roading authority for future response planning.	Accept in part The monitoring sections for each pest now match the aim for the pest and any duplication of effort between the occupier and Horizons that may arise from the occupiers' responsibility to report on pests has been removed.	While Horizons may conduct audits of roadsides, the obligation is on roading authorities to monitor the effectiveness of their management (via the rules).
Section 4.6;	25.11	NZ Transport Agency	The Transport Agency requests Horizons	Requests that Horizons consider	Accept.	With consideration of

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All rules affecting roading authorities.			to consider some flexibility with roads and transport corridors because of their unique situation of being long, generally narrow and with more neighbours than most. We note that Horizon's plan identifies a number of situations where exemptions can be sought, however we ask that the unique situation of transport corridors is acknowledged so should exemptions be sought there is ground to do so without seeming to be favouring one landowner over another.	a similar approach that has been taken on the Auckland RPMS for roads which acknowledges that the control of some pest plants in certain situations will be impractical for Roading Authorities. Amend exemption provisions to acknowledge/provide for the unique challenges of managing pest plants in transport corridors.	Provide for approved management plans in rule streams affecting roading authorities, as well as provide further guidance as to the exemption process contemplated by the Act.	approved management plans and any exemptions, the roading authority will still need to demonstrate that the objective of the Plan (reduce extent or spread) is being met.
Section 4.6	25.12	NZ Transport Agency	Amend Plan by providing diagram showing the areas that are described as "portions of road" in [Section 4.6] to help provide further interpretation.	As requested.	Note submission, with no change to the Plan.	During further consultation, Horizons and NZ Transport Agency together reviewed this concept but found nothing suitable.
Section 4.6 introduction.	25.13	NZ Transport Agency	The Agency considers that the following bullet point requires further clarification: 'Any other area where it is unreasonable to expect adjoining landowners to control pests (e.g. steep topography)'. Does this mean that when adjoining land owners have pest plants and are unable to clear them, then the Transport Agency is exempt from clearing the road reserve adjoining this area? Also does this mean that the Transport Agency is exempt from controlling pest plants on extremely steep cuts and unstable surfaces on topography such as the Manawatu Gorge?	Provide further clarification for interpretation of: 'Any other area where it is unreasonable to expect adjoining landowners to control pests (e.g. steep topography)' in Section [4.6]	Accept. The wording has been revised to list examples with a cross reference to the exemptions section.	Each specific case will be subject to review under the exemption process, on application.
Section 4.6 introduction.	25.14	NZ Transport Agency	Please include the following words (or similar) in bold to the following sentence: "Where the road reserve boundary is unknown it shall be taken as 10m from the road centre line, unless this includes another occupier's land, which in this case, the distance (that will be less than 10 m) will be adjusted accordingly".	As requested	Accept. Suggested wording added to the second paragraph of Section 4.6	

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Section 4.6, occupiers, bullet 4.	25.15	NZ Transport Agency	With regards to the last bullet point, the Transport Agency is the 'road controlling authority' for all State Highways and for safety reasons the Agency does not support allowing adjoining landowners to carry out pest management works on the road reserve. The Transport Agency's Network Outcomes Contractors undertake pest management on State Highways and do so with the benefit of appropriate traffic management measures including training and signage. The proposed pest management requirement fails to recognise the Agency's power of control as road controlling authority and pursuant to Section 51 of the Government Roadway Powers Act 1989; it is also considered very dangerous. We suggest that where organic farmers are adjoining the Transport Agency land, then no spray signs are erected, and pest management agreements are in place between the Agency and the organic farmer to ensure any pest control does not affect the organic farms certification.	Review clause relating to adjacent landowner responsibilities on road reserves and amend Plan to provide for the Agency's responsibilities as a road controlling authority, e.g., traffic management.	Accept. There is now a requirement that the occupier in such instances must engage with the roading authority to identify alternate measures of control.	
Proposed Rule 5.7.1; Which equates (in purpose) to: Rule 5.3.1; Rule 5.8.1.	25.25	NZ Transport Agency	The Transport Agency agrees that an annual survey to identify the presence of pest plants identified in Table 5-1 is required. We ask that Council provide knowledge and expertise for species identification and methods to be used and share any prior knowledge of pest species recorded in the road reserve or adjoining land and this be captured in the MOU.	No decision requested but provides helpful guidance for MOU content if appropriate.	Note submission.	
Section 4.6; Section 5.7; Section 5.8.	25.26	NZ Transport Agency	The 'sustained control' and 'progressive containment' is likely to be particularly relevant in a linear transport infrastructure situation, especially in the more urban environments that tend to harbour greater numbers of pest plants	No decision requested but provides helpful guidance for MOU content if appropriate and means of implementation in linear transport network.	Note submission.	

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			<p>than rural environments. Containing species within urban areas and removing outliers is a practical solution when surrounded by properties that also contain numerous pest plants.</p> <p>State highways are linear, travelling through numerous different human and natural environments. Linear transport networks also tend to have significantly more neighbours than most landowners. In most cases the road verge is reasonably narrow and is vulnerable and can be influenced by how neighbour's properties are managed. Due to the unique characteristics of the State highway network the Transport Agency welcomes Horizons to work with the Agency to identify the best approach to different areas of our network. This may mean there are different control programmes for a particular species, depending on the specific site situation and surrounding environment.</p>			
Good Neighbour Rules.	25.31	NZ Transport Agency	In other parts of the country the Transport Agency has had issues with adjacent landowners not having the recovery of losses incurred resources to control pest plants on their property adjoining an area that the Transport Agency was actively managing for pest plants. What actions will Horizons take if someone does not have the resources to control pest plants in land adjoining Agency land?	No decision requested, but seeks clarification about Horizons response where a landowner does not have the resources to control pest plants in land adjoining Agency land.	Note submission. In such instances, the obligation on the adjacent occupier is likely to remain, even if they cannot afford to do the work.	Horizons has a number of options at its disposal under the Act – the one perhaps most appropriate in this scenario is to act on default and recover the cost via rates or liens on the land.
Proposed Strategy Section 3.5.4.	25.37	NZ Transport Agency	The Transport Agency commends Horizons new road reserve initiatives, some of which are currently being trialled in the Auckland Motorways maintenance contract (decreasing mowing frequency, use of 'cue for care' mown thin strips).	Supports provisions.	Note submission and support.	Collaboration on strategic approaches to roadside pest management will be essential for success.
	25.38		The Transport Agency would like to	No decision requested, but offer		

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			continue working collaboratively with Horizons on these initiatives.	to work with Horizons where appropriate.		
All Good Neighbour Rules.	25.4	NZ Transport Agency	A good neighbour for one species may be quite different for what is required for another species, therefore specific information is required for each pest plant species to identify how to comply with the good neighbour rule.	The Transport Agency requests the opportunity to discuss the needs of individual species and the required control for the successful implementation of the good neighbour rule.	Note submission.	
Section 4.6.	42.1	Gordon	These two bullet points need to be written in such a way that they ensure that control is undertaken; not in a way that gives wriggle room for control to not be undertaken. I think that with the current wording that outcome may well be interpreted.	Suggest amending the 10m rule with respect to controlling weeds in road reserves and that the "fenced boundary" of the road reserve is far more definitive in the vast majority of situations. Also, there needs to be clarification around what "unreasonable to control" really means in practice.	Accept in part. The wording has been revised to list examples with a cross reference to the exemptions section. There is now greater explanation around what defines the boundary between work to be undertaken by a roading authority' and work to be undertaken by another occupier.	To define what "unreasonable" means in practice may limit the Plan' scope. It is better to assume the rule applies all of the time except where there is a formal exemption. Note, exemptions may only be granted if it results in achieving the objective of the Plan.
Section 4.6.	92.4	NZDF	NZDF supports roading authorities and occupiers of road reserves being made to control pests along the road corridor. Road reserves act as pest reservoirs and encourage spread of pests, which can compromise other pest management work around the region. It is important that the criteria clearly state who is responsible for weed control along any roadside.	Retain Section [4.6] as notified, but clarify the criteria so it is easier to understand who is responsible for weed control along the different categories of roadside within the Horizons' Regional Boundaries.	Accept in part. There is greater explanation around what defines the boundary between work to be undertaken by a roading authority' and work to be undertaken by another occupier.	The criteria concerning <u>who</u> needs to undertake the work is clear now that the roading authority rules and Good Neighbour Rules have been revised.
	92.5		The term "roading authority" is not defined, making the application of Rule 5.7.1 unclear. This rule should only apply to public roads, and not to private roads such as those within NZDF's Waiouru Military Training Area.	Include a definition for "roading authority" in the glossary, which excludes private NZDF roads.	Accept in part. It has been noted in the Plan that roading authority provisions do not apply to NZDF internal roads.	
Proposal Rule	93.24	MPI	It isn't clear that that this rule means	We suggest this sentence state	Accept.	

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5.7.1 and similar; Which equate to: Rule 5.8.2; Rule 5.12.4; Rule 5.14.3.	93.28		that upon discovery the roading authority must destroy the pests.	this expressly so as to be clear about who must carry out destruction.	Rules for roading and rail authorities rules make it clear that it is they that must manage the pests in accordance with an approved management plan (as to extent of control and timing of delivery).	
Section 4.5; Section 4.6	94.6	Ruapehu District Council	We agree to the reasonable expectations of roadside pest control and containment that the [Plan] puts forward. However, we are concerned that there is potential for costs to exceed the ability to pay. We have a well – established annual pest plant management meeting with Horizons to collaborate on the containment of pest plants. Total eradication of any pest plant is out of the question. We are concerned about the trade-off between the proposed reduction of mowing frequency in the he summer months to minimise seed dispersal with motorist safety and general district-wide tidiness.	None sought.	Note submission.	
73. Rook						
Section 5.6.1	4.1 (withdrawn)	Hanbury-Sparrow	There is no empirical evidence supporting claims of an ecological or economic threat. Rooks might be considered [analogous] to the extinct New Zealand raven.	Cease the programme to eradicate rooks.	Note submission.	During further consultation, this submitter withdrew their submission.
Table 5-4; Section 5.6.1	17.1	Greater Wellington Regional Council	Hawke’s Bay Regional Council, Horizons and GWRC have a long history of cooperation when working on the rook management programme.	Recognise the relationship between the three councils in writing within the [Plan] document.	Note submission. No change to Plan, but recognise in the supporting documentation that is included by reference.	This relationship with regard to rook management is recognised in the benefits and cost analysis that attends the Plan.
Section 5.6.1	46.9	Federated Farmers	Federated Farmers supports the proposed management regime for the rook. Rooks cause significant issues to crops. We would also like to see Council	That the rook management program is maintained, however resources are increased to assist the public understanding of the	Note submission, with no changes to Plan.	This is an operational matter.

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			targeting large rookeries during the summer months, when rooks alternate between walnut, oak, fruit trees and pasture. We believe the public needs to be better educated about the challenges of rooks and encourage public identification and reporting of rooks to Council.	problems caused by rooks.		
Section 8; Analyses of exacerbators and beneficiaries and allocation of funding.	46.22	Federated Farmers	Federated Farmers opposes the breakdown of costs associated with management of the rook. Funding is proposed to be split according to 10% Equalised Capital Value and 90% Targeted per hectare rate on properties over 4ha.	That the funding of rooks is altered to reflect rooks as a community problem, not a large landowner problem. Federated Farmers suggests that the breakdown of this would be best placed at 40% UAGC and 60% EQCV to take account of the burden of costs of managing populations of pests which live in protected.	Disagree. The analysis of beneficiaries and exacerbators in support of the Plan shows that specific benefits to farming are larger than the general community benefit.	The current weighting is about right when considering the analysis under clause 7 of the NPD.
Section 5.6.1	80.1	Wishart	Rook damage wildly exaggerated and there is no empirical evidence supporting claims. Use of DRC 1339 is in contravention to the statement by the Agricultural and Veterinary Medicines group regarding the licensed use of this toxin.	Cease the programme to eradicate rooks.	Disagree. There is sufficient evidence that, left alone to increase in population, rooks will do significant economic damage.	Horizons uses DRC 1339 according to label.
Section 5.6.1	91.15	Waikato Regional Council	We strongly support the rook control policy outlined and acknowledge that Horizons' work reduces the potential spread of rooks into southern parts of the Waikato region. Operationally, we wish to better share knowledge and field experience gained in treating rooks in low numbers. We are interested in trialling best practices and new techniques for their management. Zero density for eradication pests is a term referred to in the glossary but not used in reference to the management of rooks. We suggest you use this term because it helps demonstrate alignment	In the objective or the aims, the term 'to achieve zero density' (or similar wording) is used.	Accept by including "zero levels" in the description of aims.	Note that the rook control aims have been refocused on the eradication of active rookeries (as opposed to rooks) over the life of the Plan. This is in recognition that the eradication of rooks might take longer than the life of the Plan to achieve.

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			with neighbouring council terminology and is a more scientifically robust term that reflects the practical reality and difficulty in destroying the last individual of the target species.			
Table 5-5	93.17	MPI	The NPD requires that where an outcome is expected to be achieved is more than 10 years the plan must state what is intended to be achieved in the first 10 years.	Under the aims in Table [5-5], add a statement regarding the expected outcome within the first 10 years of the plan, or during the current term of the plan prior to the next review (as applicable).	Accept by including a reduction target for the number of active (breeding) rookeries in 2027.	Note that rook control aims have been refocused on the eradication of active rookeries (as opposed to rooks) over the life of the Plan. This is in recognition that the eradication of rooks might take longer than the life of the Plan to achieve.
Rule 5.6.1	93.22	MPI	The footnote to this rule would be better included in the glossary.	Move this explanation to the Glossary as a definition of the term 'control'.	Note submission, with no change to the Plan.	The more general definition of 'control' is considered to be appropriate (and less confusing); see the Glossary.
Table 5-4; Section 5.6.1	94.3	Ruapehu District Council	Rooks have been observed as far south as Ohakune. This implies that the pest is spreading. We advocate Horizons commitment to eradicating this pest because it can have devastating effects on newly sown crops and damage mature pasture by tearing it up.	Continue rook programme.	Note submission and support.	
74. Rules prohibiting pests from sale and distribution						
Proposal Section 2.1.1; Section 2.1; Section 5.3.6; Section 5.8.2.	51.6	DOC	This section is poorly constructed and confusing as to what it aims to achieve.	Review and revise this section to bring it in line with the sections of the Biosecurity Act dealing with the sale and distribution of unwanted organisms. Include unwanted organisms that are in the region by not managed by Horizons e.g. pest fish, pyp grass, white bryony, and rainbow skinks.	Accept in most part through the changes set out below. Section 2.1.1 is replaced with new Section 5.3.6, using the wording directly from the Act (ss. 52 and 53), as opposed to having them framed as rules in the Plan.	Section 2.1 is to draw attention to other legislative provisions that limit the ability to move certain plants and animals around the landscape. Section 5.3.6 is to draw attention to the Act with regard to provisions that limit the ability to move the pests in the Plan around the landscape.
	51.7		It is unclear why these Biosecurity Act provisions are provided here. The comment on the legal ownership of	Revise this section and include specific provisions relating to the keeping of rabbits under the plan		

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	51.8		domestic of farmed animals appears superfluous for all species in this section except perhaps for rabbits. Not all other potential pest animals that need to be managed (e.g. invertebrates) are covered by the legislative instruments and responsibilities cited. Changes in legislation covering possum need to be reflected. The prohibition of the transfer of any aquatic life between water bodies needs to be reflected.	for that species. Amend 2.1.1 as with wording specifically suggested (pg. 4 of submission – also noting DOC is waiting on a more elegant legal expression of this material); Include the full description of prohibition on transfer of aquatic life as outlined in submission (pg. 4).	species as examples some of the pests that are managed by other agencies. Possums have been deleted from this list. The Unwanted Organism (UWO) statements general. Section 5.8.2 (rabbits) is now clear that the Plan does not apply to domestic rabbits. The statement concerning the liberation of fish now includes any aquatic life.	However, the UWO statements need to be general. The Plan is not the vehicle for Horizons to convey messaging about every pest being managed by every agency in the region. There is need to circumvent the application of ss 52 and 53 to species that can be kept legally in domestic or farming situations (i.e. domestic rabbits).
Proposal Section 2.1.1; Section 5.3.6	93.7	MPI	The section sets out requirements that are already found in the Biosecurity Act. It is important that occupiers are aware that these provisions carry higher penalties.	Reword this section to refer to ss 52 and 53 of the Biosecurity Act rather than make them rules in the plan. Amend the final paragraph to specify that a breach of these sections of the Act is an offence under s 154 (O).	Accept. The Plan now reflects wording directly from the Act (ss. 52 and 53) in a particular section, as opposed to having them framed as rules in the Plan.	
75. Site-led programmes and Protecting Value in Places						
Section 1.3; Section 2.1; Section 5.1.5.	25.1	NZ Transport Agency		We recommend including 'protecting values in places' as a purpose of the plan.	Note submission.	The purpose of "protecting values in places" is sufficiently covered in the Purpose with the statement to "reduce or eliminate" adverse effects. Introducing the terminology in Sections 1.3 and 2.1 might be confusing since Horizons is not using the Plan to undertake the Protecting Values in Places category of pest management (Per Section 5.1.5).
	25.19		This type of programme is not included on the 2.1 list. The Transport Agency recommends protecting values is also included in Section 1.3 'Purpose'.	Consider reference to site-led pest programmes as a control designation in section 2.1. Amend Plan to refer to site-led pest programmes as a control designation in section 1.3.	No change to the purpose (Section 1.3), or Organisms Classified as pests (Section 2.1) of the Plan. Section 5.1.5 is clearer as to Horizons taking a non-regulatory approach to Protecting Value in Places.	
	25.2		'Protecting values in places' is not listed [in section 2.1] although it is later in the document (Section 5.1.5) as a pests programme, which aligns with the National Policy Direction as set out in 4 (1) (b).	Amend Plan to make reference to 'Protecting values in places' (Site-led pest programmes).		

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Proposed Strategy Section 10; Proposed Strategy Table 3.	48.25	Forest & Bird	Forest & Bird supports the site-led programme initiatives for biodiversity outcomes that Horizons has proposed and supports the biodiversity enhancement programme which aims to bring the "Top 100" wetlands and the "Top 200" bush remnants under active council management. Forest & Bird supports the implementation measures provided as well.	Retain the site-led programme initiatives for biodiversity outcomes in the Biosecurity Strategy.	Submission noted, with no changes to the Plan.	These programmes will continue to be supported through Horizons non-regulatory site-led approaches.
	48.26		Forest & Bird supports the range of pests listed as part of the site-led biodiversity programme but there are a number of omissions from the list that need to be included. Forest & Bird would also like to see a better definition of feral cat to enable better site-led management of cats that display no evidence of ownership.	As per Section 10.3. species control is not limited to those named in the Biosecurity Act, therefore all three species of rat, hedgehogs and possums need to be included on the list of pest animals for site-led management. Include a better definition for feral cat, which also included strays. Suggested text: a cat without a microchip or other identifier (such as a collar or harness).		
Good Neighbour Rules for site-led programmes.	51.9	DOC	Rules banning the sale and distribution of site-led pests are not the only means by which these pests can be managed. Good neighbour rule provisions can be used to help manage seed sources and buffers on adjacent land adjacent to site-led places could be of significant benefit to site-led programmes.	Include Good Neighbour Rule provisions for site-led programmes to address key risks to the success of these programmes.	Note submission, however, as there are no site-led programmes defined in the Plan, there are no Good Neighbour Rules of this nature.	Horizons has chosen to manage site-led programmes outside the auspices of the Plan.
Section 5.1.5	51.22	DOC	The definition provided is not consistent with the NPD. We suggest alternate wording for this definition.	Adopt changes to this section as outlined in submission (pg. 10).	Accept through revision of the definition of Protecting Value in Places to be consistent with NPD.	
76. Slider turtle						
Proposed Strategy Section 5.4	91.18	Waikato Regional Council	We are concerned at the number of red-eared slider turtles recently observed or captured in the wild and we have listed them as a pest. This species is among a number that may be included on a	Add this species as a new potential pest to Table 2, Section 5.4 of the [Strategy] with the inclusion of explanatory text (per submission pg. 20).	Note submission, with no change to the Plan at this stage.	Horizons retains the option to investigate the inclusion of this pest into site-led initiatives, or investigate whether it should be

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			National Pest Pet Biosecurity Accord. We believe there is sufficient uncertainty about the potential for these animals to breed in New Zealand conditions to warrant regional councils to treat them as animals of interest.			included in future Plans.
77. Strategic relationships						
Figure 3-1	11.2	Kahungunu ki Tamaki nui-a-rua	The relationships between Maori, their culture and traditions and their ancestral lands, waters, sites, wahi tapu, and taonga are referred to in the Local Government, Resource Management and Biosecurity Acts, as well as within Treaty settlement legislation. It is only proper and fair that this is reflected in the proposed [Plan]. The amendments sought would help create synergy and co-operation between pest management activities in the Hawke's Bay, Horizons and Greater Wellington regions.	The addition of a section referring to Maori in the diagram at Figure 3-1 in recognition of their status under the Local Government, Resource Management and Biosecurity Acts, and Treaty settlement legislation.	Accept through revising Figure 3.1.	
Various.	11.8	Kahungunu ki Tamaki nui-a-rua	The relationships between Maori, their culture and traditions and their ancestral lands, waters, sites, wahi tapu, and taonga are referred to in the Local Government, Resource Management and Biosecurity Acts, as well as within Treaty settlement legislation. It is only proper and fair that this is reflected in the proposed [Plan].	That Horizons and their contractors who operate within pest management and biosecurity functions communicate and hold regular hui with Kahungunu ki Tamaki nui-a-rua and our Treaty settlement affiliates.	Accept. Parts of the Plan have been revised as identified under issue 26 above.	This submission is very operational in context and can always be explored with Kahungunu ki Tamaki nui-a-rua upon Plan implementation.
Proposed Strategy Section 11.1	17.2	Greater Wellington Regional Council	GWRC has been omitted from the list of councils that Horizons liaises with on page 132.	Correct the omission of GWRC from the list.	Note submission, with no change to the Plan.	This oversight can be addressed in associated operational documents such as the Annual Operational Plan and strategic plans.
(Plan implementation)	46.2	Federated Farmers	Federated Farmers supports the approach of Horizons as articulated in the statement "The task of strategic pest management is much greater than can be dealt with by Horizons alone... successful pest control relies on land	That Horizons uphold a partnership approach to working with landowners throughout all aspects of the Plan and its implementation.	Note submission, with no change to the Plan.	This submission is very operational in context and is something which can always be explored with Federated Farmers upon Plan implementation.

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			occupiers and the community to work jointly with Horizons to achieve the aims and aspirations." We believe this establishes a useful framework within which the partnership approach with landowners is imperative to achieving the goals of both the Plan and Strategy. We note that from our observations, Horizons animal pest team generally work well with landowners and we hope that partnership approach will continue long into the future.			
(Plan implementation)	48.27	Royal Forest and Bird	Given Forest & Bird's strategic plan to get New Zealand predator free by 2040, we absolutely understand that pests and their impacts are not constrained by administrative and catchment boundaries and therefore support the need to collaborate on national and inter-regional programmes and initiatives to achieve this vision.	Retain strategic relationships to ensure the biosecurity of the Horizons region and beyond.	Note submission, with no change to the Plan.	
78. Sulphur crested cockatoo						
Table 2-1	82.1	Beautrais	There are increasing numbers of sulphur crested cockatoo in the Whanganui and Rangitikei districts with a flock of around 50 bird seen regularly flying over Westmere, a flock adjacent to Busy Park, and another at Sutherlands Bush. They should be eradicated now before they become a serious pest and cause problems such as: <input checked="" type="checkbox"/> Competition with native kaka for suitable forest habitat; <input checked="" type="checkbox"/> Threat to orchard production.	Consider putting sulphur crested cockatoo on the pest animal list.	Note submission, with no change to the Plan at this stage.	Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to investigate for future Plans.
79. Sustained control						
Section 5.8	48.7	Forest & Bird	We support Horizons' Sustained Control Programme.	Expand the Sustained Control Programme to incorporate more of the region.	Note submission, with no change to the Plan at this stage.	Noting that wilding pines have been moved to progressive containment and a map of the full extent

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						of the possum management area now attends the Plan
Section 5.1.4	51.21	DOC	The definition provided is not consistent with the NPD. We suggest alternate wording for this definition.	Adopt changes to this section as outlined in submission (pg. 9).	Accept. Revision of references to sustained control programmes to be more consistent with the NPD	
Section 5.1.4	81.12	KiwiRail	The draft Plan has shifted blackberry, broom species, gorse, nodding and variegated thistle, and yellow ragwort from (what was effectively) Sustained Control to Progressive Containment. The intermediate outcome is to provide for the sustained control of the pest to a level where externality impacts are manageable. The focus is on the densities of a subject and ensuring they do not reach a level where they are causing significant externality impacts. Sustained control is a strategy for pests of low to moderate densities but of such wide geographical spread that they cannot be easily eradicated.	Add assign plants from the progressive containment class to the sustained control class which are more appropriately managed under this category. These include species that are widespread throughout the region. Examples include gorse, broom, blackberry, nodding thistle, ragwort Explain rationale for the shift of these species from Sustained Control to Progressive Containment.	Note submission, with no change to the Plan. The justification for the change does not need to be in the Plan. Further, the analysis of benefits and costs show that progressive containment has a cost beneficial outcome.	The species mentioned were under 'boundary control'. While the pests are widespread, there are still parts of the region that are clear of them. The continuation of the boundary control only policy (i.e. 'sustained control') was considered to be ineffective at protecting the areas that are clear and decided that Progressive Containment was the preferred approach
Table 5-21; Tabl3 5-23.	93.21	MPI	The objectives in tables 5-17, 5-18, 5-20, and 5-21, should be consistent with the NPD's wording for the "sustained control". In addition this section does not comply with cl 4(1)(c)(i)-(iii) of the NPD.	Amend the text to better match the definition of "sustained control" in the NPD. In order to comply with the NPD address the matters outlined in the submission (pg. 5).	Accept. The geographic area the plan applies to (including a map for possum management area) has been added to the Plan. The extent to which the outcome will be achieved and period for doing this has been included in the Aims.	
80. Sycamore						
Proposed Strategy Section 10.5	42.6 (part)	Gordon	Include Sycamore in the tree section and common Ivy in the vines section if this is different from the "German Ivy" in the herbs section.	Include Sycamore in the tree section and common Ivy in the vines section if this is different from the "German Ivy" in the	Note submission, with no change to the Plan.	It is acknowledged that sycamore can be a significant threat to native forest remnants in some

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				herbs section.		places. However, the threat is best managed under site-led programmes which are outside the auspices of the Plan.
81. Tarweed (<i>Parentucellia viscosa</i>)						
Table 5-2	5.2	Webster	I hope the final draft makes allowances for and consideration of other weeds such as tar weed (<i>Parentucella viscosa</i>). This species is growing unchecked on many of the region's roadsides and is now invading paddocks. This species has a detrimental effect on clover pastures.	Include Tar Weed in the [Plan].	Note submission, with no change to the Plan at this stage. No change to plan at this stage.	Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to investigate for future Plans
82. Taxonomic corrections						
Table 2-2; Table 4-2; Table 5-1; Table 5-4;	12.1	Ogle	For legal proceedings it is important to have correctly spelled and up-to-date formal names of the pest plants. For formal names where there may be a difference of view among taxonomists as to the 'correct' name, synonyms should be given.	The following amendments are suggested for the table on pp. 16-17: 1. <i>Cenchrus macrourus</i> and <i>C. purpurascens</i> . These relatively 'new' names should cite their synonyms under <i>Pennisetum</i> , viz. <i>Pennisetum. macrourea</i> and <i>Pennisetum alopecuroides</i> . 2. Just using " <i>Passiflora</i> species" for 'banana passionfruit' is too vague. I can't see any easy way of identifying what are the pest species except by a list of <i>Passiflora tripartita</i> var. <i>mollissima</i> , <i>P. tripartita</i> var. <i>azuayensis</i> , <i>P. tarminiana</i> , <i>P. mixta</i> , <i>P. pinnatistipula</i> and <i>P. x rosea</i> (this may not be exhaustive, but all are called 'banana passionfruit' by different authorities, including NZPCN.) 3. Eel grass (<i>Vallisneria australis</i> –	Accept most as follows; 1. Disagree. The addition of synonyms is unnecessary for pest plan implementation and utility. 2. Adopted. 3. Adopted. 4. Adopted. 5. Adopted. 6. Disagree. The species to be managed as an Exclusion pest under the Plan is as named. <i>P. karka</i> is present in the Region. 7. Adopted. 8. Adopted. 9. Adopted.	The taxonomic names in the Plan follow the preferred name as posed by the New Zealand Plant Conservation Network as at March 2017.

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				<p>not 'species'. My information is that this is the only wild species in NZ, <i>Vallisneria spiralis</i>, <i>V. gigantea</i>, <i>V. americana</i> being synonyms (NZPCN)</p> <p>4. Asiatic knotweed's preferred name (Landcare Research and NZPCN) is <i>Fallopia japonica</i>; <i>Reynoutria japonica</i> might be cited as a synonym.</p> <p>5. <i>Schoenoplectus californicus</i> – correct spelling.</p> <p>6. <i>Phragmites australis</i>. It is <i>P. karka</i>, not <i>P. australis</i>.</p> <p>7. <i>Spartina</i> should read "<i>Spartina</i> (all species and hybrids)"</p> <p>8. <i>Utricularia gibba</i> – common name of 'bladderwort' could be misleading, since NZ has several native species of 'bladderwort'. <i>U. gibba</i> is often called 'humped bladderwort' overseas.</p> <p>9. <i>Gunnera tinctoria</i> and <i>G. manicata</i>. Your draft says they are both called Chilean rhubarb which is quite wrong. Only <i>G. tinctoria</i> is from Chile; <i>C. manicata</i> is from Brazil and many authorities call it Brazilian rhubarb (or Brazilian gunnera). I have never heard of them hybridising, so wonder what your statement (p.16) is based on.</p>		
83. Tutsan						
Section 5.7.4	13.2	Whanganui District Council and	Tutsan poses a serious risk to productive land within the Whanganui District	Tutsan should be included within the "eradication programme." At	Disagree.	The occupier is the predominant beneficiary

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		Whanganui Rural Community Trust	environs.	the very least, the responsibility for identifying and progressively containing this pest plant should NOT be borne by the occupier but rather should be the responsibility of Horizons.	Total eradication is not considered to be achievable across the entire Region.	and exacerbator and it is fair that much if not all of the cost is borne by them.
Section 5.7.4	46.10	Federated Farmers	Federated Farmers supports the inclusion of Tutsan in the Plan, engagement of Regional Council in the establishment of biocontrol programmes, and working with community groups such as the Tutsan Action Group. It is noted that Tutsan is a difficult weed to control and more support and assistance for those landowners affected should be provided. Estimated cost of controlling Tutsan varying between \$10,000 and \$30,000 per annum per farm in the Central North Island. These costs vary depending on farm location and how close to a river or forest the farm is. One farmer has spent \$100,000 trying to get pasture back from Tutsan infestation. These figures exclude the loss of productive capability of land infested with Tutsan. Federated Farmers is also supportive of the good neighbour rule being applied and consider this will assist in controlling Tutsan spread.	That assistance is provided to landowners whom are trying to control Tutsan on their property.	Note submission, with no change to the Plan.	Horizons will continue to provide assistance for tutsan control through biocontrol, chemical control, and best practice guidance, as well as through oversight and enforcement of the rules in the Plan
Section 5.7.4	81.8	KiwiRail	Yellow Bristle Grass and Tutsan have been identified as largely infesting roadsides/cuttings and waste ground. These species have not been included in some Plans. Direct control or a regulatory approach has been not considered to be necessary, appropriate, or cost effective. This amounts to weed hygiene rather than any significant effect on agricultural production or biodiversity values. Infestations have been identified	Consider removal Yellow Bristle Grass and Tutsan in the [Plan]	Disagree. Analysis shows that there is potentially a significant cost to individual occupiers in the agricultural sector if this pest is left to expand.	Progressive Containment is a more suitable category for managing a species where new or light infestations can be eradicated.

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			via stock movement and hay/silage for YBG.			
Section 5.7.4	94.4	Ruapehu District Council	We would like to advocate that tutsan be moved from the progressive containment programme to the eradication programme. This species will spread to invade almost all types of terrain. It is a serious environmental pest producing large amount of seed.	Move tutsan from progressive containment to eradication.	Disagree. Total eradication is not considered to be achievable across the entire Region.	
84. Wallaby						
Section 5.5	91.14	Waikato Regional Council	Support the inclusion of wallaby species. It is right that they be deemed exclusion pests as every effort should be made to keep them out of the region. There is no misalignment between our RPMPs. Table 5-1 notes that wallaby are production pests only. They are a significant environmental pest also. Table 5-2 notes one of the outcomes of their control benefits ecosystem values. It is not beyond the capability of occupiers/hunters to obtain Dama Wallabies and keep them as pets or to release them for hunting. We suggest you have a rule pertaining to the possession of live wallaby.	Table 5-1 should include reference to wallabies as environmental pests. Adopt a specific rule for wallaby (as described on pg. 14 of the submission).	Accept. Wallaby identified as Environmental Pest in Table 5-1. Inclusion of a rule concerning the possession of live wallaby.	Support noted
85. Weedbusters						
Proposed Strategy Section 7.4.1	48.22	Forest & Bird	Forest & Bird supports Horizons strong support and participation in the national Weedbusters programme in the region.	Continue with support and participation in the national Weedbusters programme as part of the biosecurity strategy for the region.	Note submission.	These programmes will continue as part of Horizons' non-regulatory work as identified in annual operation plans.
86. White bryony						
Table 5-3 (Eradication pests)	91.13	Waikato Regional Council	We note 31 [named] pest plants that are in our RPMP and are not in Horizons' [Plan]. We have examined the non-alignment and find no significant cross boundary issues with two exceptions: <ul style="list-style-type: none"> • Pampas; and • White bryony. We request that Horizons actively	Add white bryony to table [5-4] with an explanation as to why it is in the [Plan], the threats it poses, and that MPI manages it.	Note submission, with no change to the Plan.	This species is being managed by MPI with no need for regulatory input from Horizons, and therefore does not need to appear in the Plan. Should MPI cease white

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			engage with us on any site related issue raised by WRC specifically over pampas. We suggest that white bryony be included in your pest plan to ensure that, should there be funding cuts to MPI, Horizons can undertake management. Even if Horizons does not contribute funding, it is important to highlight to the regional community the complete list of high threat pests.			bryony control before the species is eradicated from the region, Horizons retains the ability to initiate a process whereby the pest can be included in the Plan
87. Wilding conifers						
Section 5.7.1	25.29	NZ Transport Agency	The Transport Agency provided comment on the "Wilding Conifer Pest Management Plan Rule Development Project." Draft material for consultation and the Transport Agency's comments are similar for the proposed wilding pine management in the Horizons region: <ul style="list-style-type: none"> Provisions in regards to wilding pines need to be clearer as to expectations, how they link into the various programmes and how they apply to different landowner situations. Given the nature of state highways (long, linear properties), the provisions need to be worked through with Horizons to ensure that a practical approach to reporting and responding is in place. Our network management areas are significant in extent and maintenance work programmes would have to specifically be developed to achieve these provisions, which would be a significant undertaking for the Agency nationally. The key changes to the architecture revolve around the way linear infrastructure is dealt with. The Transport Agency suggests that provisions be developed that direct road controlling authorities, and Kiwi Rail as a 	Amend Plan to provide further clarification/guidance on implementation of wilding pine provisions, especially as it relates to linear transport corridors.	Accept. Rules pertaining to road and rail authorities have been changed to be more clear and direct, and to include the ability for these agencies to work under approved management plans, where appropriate.	Approved management plans offer the flexibility needed to practically manage the linear nature of the road and rail network without compromising the objectives of the Plan.

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			linear transport system provider, work together with Horizons to deal with the Wilding Conifer problem. The approach to the Good Neighbour Rule, changing land use over time and distance (including roads that dissect forestry blocks), regional and local environmental values (native vegetation, and habitat) can then be agreed which reflect the issues and practical solutions.			
Section 5.7.1	41.1	LINZ	LINZ supports the aims and outcome that <i>Contorta</i> Pine is controlled to zero-density in the Active Management Zone to protect natural values.	Retain the aim and outcome that <i>Contorta</i> Pine is controlled to zero-density within the Active Management Zone.	Note submission and support.	As a Crown Agency on non-rateable land, there are no rules governing LINZ for the control of pest pines in the Plan.
	41.2		LINZ considers it is unclear whether the on-farm Biosecurity Risk Assessment Tool applies to unallocated Crown land administered by LINZ, and therefore whether eradication rule 5.14.6 for <i>Contorta</i> Pine in the Good Neighbour Process Zone would apply to such land.	Amend to clarify whether the on-farm Biosecurity Risk Assessment Tool applies to unallocated Crown land.	The removal of the Biosecurity Risk Assessment Tool voids the requested clarification.	
Section 5.7.1	46.11	Federated Farmers	<p>Federated Farmers supports the inclusion of wilding conifers in the Plan. Wilding conifers, particularly <i>Pinus contorta</i>, have a significant potential to invade pastoral areas and covenanted areas on properties close to the central plateau, particularly in the Taihape region.</p> <p>Federated Farmers supports the objective of the Wilding Conifer Pest Management Plan to work collaboratively to develop agreed best practice regional pest management plan rules. We agree that while efforts to produce nationally consistent guidance are underway, it would be ineffective for specific wording in the Plan.</p> <p>However, Federated Farmers submits that in recognition of the <i>New Zealand Wilding Conifer Management Strategy Implementation Programme Rule</i></p>	That Horizons acknowledges the program this is underway on the Wilding Conifer Management Strategy Rule Development, and that Horizons commits to reviewing the findings to determine if and how they are appropriate to the Plan.	Note submission. Removal of "Wilding Pines" from Sustained Control and adding three more named species to Section 5.7.1 (Progressive Containment) has been undertaken after considering the draft WCMS recommendations.	<p>The Plan is not really the appropriate place to acknowledge Wilding Conifer Management Strategy (WCMS) Rule Development and so it is not mentioned. Horizons is committed to reviewing the findings and adopting them as appropriate.</p> <p>The Plan acknowledges the aims of the Nature Central Wilding Conifer Implementation Plan (which of itself is guided by the WCMS) – although these will not be a direct statutory requirements.</p>

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			<i>Development Project - Draft Material for Consultation</i> , the process that is currently being led by MPI be acknowledged in Regional Plans. Further, we would like to see Horizons commit to reviewing the findings and how they relate to the Plan.			
Section 5.7.1	48.4	Forest & Bird	We support Horizons' Progressive Containment Programme and would like to see ongoing collaboration with some of the key landowners through the Good Neighbour Rule.	Forest & Bird commends the work done to date by the Council, particularly with regard to old man's beard and wilding conifer control.	Note submission and support.	
Section 5.7.1	51.32	DOC	We support proposed approach but consider that the objective is poorly stated. In our view, unless the control zones are identified in the plan the rules will be inconsistent with the NPD. Note, where the Crown is not the occupier of public or crown lands, rules would not apply to the Crown.	Review this section in consideration of the points made (pg. 15).	Accept in most part. The rules have been revised so that the Plan is able to direct any regulatory work needed to achieve the objectives and aims. A map of the Karioi forest zone has been included.	Note there have been changes to the objective referenced in the submission, so that it is both consistent with the NPD and the regional template. This alternative wording posed in the full submission overstates the area of application ("in the Region") and understates the values protected by only naming natural grassland and low stature vegetation.
Proposed wilding pine sustained control programme	51.35		We support the outcomes identified for wilding conifer pest management.	[Retain]	Note submission.	The whole section has been removed and merged into other parts of the Plan (section 5.7.1 for example), where it is now more explicit about which species will be controlled, where.
Proposed wilding pine sustained control programme;	81.13	KiwiRail	The Volcanic Plateau is an example of "protecting values in places" from Contorta Pine. This is highlighted by the Outcomes in Table 5-13 "High-value natural areas prioritised for protection under the Regional Biodiversity	Relocate Contorta Pine to "Protecting values in places" Site led pest plants – Volcanic Plateau. Describe this as wilding pine. Retain a MOU process for the	Accept in part as identified through the changes below. Define the Karioi Forest Zone as well as the Active	Progressive containment is equally as useful to achieve the ecosystems outcome being sought by the Plan. To introduce one Protecting Values in Places category

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Section 5.7.1			Programme are maintained free of contorta pine.” KiwiRail supports the MOU process for the control of Contorta Pine. Notes it is difficult to depict the Active Management Zone on the Maps	control of Contorta Pine. Identify prioritised High Natural Value Areas and map them. Map 5-8 is extensive in the Areas shown (even for Good Neighbour Process Zone Rule). Describe this as wilding contorta pine spread management. Clarify the Active Management Zone on the Maps and correlate this to prioritised High Natural Value Areas. Delete Eradication Rule 5.14.6 or discuss MOU approach with KiwiRail.	Management Zone as areas in which rules apply. Delete the eradication rule.	invites a large and unnecessary revision of the decision to use non-regulatory approaches for site-led biodiversity / ecosystems work.	
Section 5.7.1	91.8	Waikato Council	Regional	We support the inclusion of contorta pine and note the full alignment between councils. This is probably the most important pest to have a close understanding of the practical control approaches of each council.	None sought.	Note submission and support.	
	91.9	Waikato Council	Regional	In the policy for <i>contorta</i> pine and other policies, we note the inclusion of an eradication rule linked to the Good Neighbour Zone process. While a definition is made in the glossary, there is not a very clear explanation of the intent of this process.	Add to [Section 5.4.3 reasons for inclusion] additional text about the function and process of the on-farm biosecurity risk assessment tool and link it to Section 6 of the [Strategy].	Accept. The rules have been revised to remove reliance on the biosecurity risk assessment tool	
	91.10			We acknowledge the good work in controlling <i>contorta</i> pine, particularly around Karioi forest in recent year to protect Tongariro National Park and environs. However, we are concerned that there appears to be a somewhat voluntary nature of compliance by NZDF and DOC. The active management zone is the area of most relevance and concern to eradicate <i>contorta</i> from.	That Horizons develop a generic good neighbour rule for <i>Pinus contorta</i> that binds all landowners to achieve compliance in the active management zone.	Note submission and acknowledgment of good progress, but disagree with posed solution. For the Plan to be successful, Crown Agency voluntary commitment to eradicate pest pines from Crown Estates that they occupy is vital. This cannot be compelled by a Good Neighbour Rule. The revised Karioi Forest	

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					rules compel non-Crown occupiers of Crown land to play their part.	
Proposed wilding pine sustained control programme; Section 5.7.1	92.2	NZDF	Wilding conifers should be placed in a progressive containment programme due to its fit to density and distribution criteria in Section 5.1.3 and because of its capacity to rapidly increase in number and rapidly invade new territory. A cost benefit analysis would help this assessment; however, NZDF acknowledges Horizons' intentions to incorporate direction from national level on wilding conifer control.	Change wilding conifer from the sustained control programme to progressive containment.	Accept by removing the sustained control programme for wilding pines. Further pines have also been added to the Progressive Containment category with <i>P. contorta</i> in line with recommendations of the WCMS.	As more information comes to light about the pine species that potentially threaten the various values and assets on the Volcanic Plateau, these species can be added through a minor review of the Plan.
Section 5.7.1	92.6	NZDF	Should include Corsican pine as this is proving to be a significant component of the wilding conifer infestation at the Waiouru Military Training Area (and is likely to be in other similar high elevation sites), to a greater extent than <i>contorta</i> in some locations. To effectively manage Corsican pine infestation there needs to be the ability to control seed sources and so the species needs to be identified and included in the [Plan].	Amend Table [5-9] to include Corsican pine, crack willow, heather.	Note submission, with no change to the Plan at this stage. Inclusion of Corsican Pine was investigated, but it was concluded that the amount being grown on private land was so large that further investigation, analysis and consultation should be undertaken.	As more information comes to light about the pine species that potentially threaten the various values and assets on the Volcanic Plateau, these species can be added through a minor review of the Plan
Table 5-11	92.7	NZDF	The Principal Measures in Table [5-11] states that <i>"NZDF has chosen to control contorta pine, and is therefore responsible for maintaining sustained control (three-year rotation) of contorta pine wherever it occurs on land occupied by the NZDF or NZDF land leased to other occupier."</i> This is not correct, as there is no legal requirement for NZDF to maintain a three year interval for control.	Amend the Principal Measures in Table 5-13 as follows: <i>"NZDF has chosen to control contorta pine and other pine species, and is committed to maintaining sustained control of these trees wherever they occur on land administered by the NZDF."</i>	Accept in part through some revision, as below. <i>"The New Zealand Defence Force (NZDF) has a control programme that commits to the management of wilding pines species on the land that they occupy."</i>	The change has come about in recognition that NZDF do control more species than the Plan requires and does so under its own volition. The wording pertaining to DOCs commitment was also changed for the same reason.

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Proposed rules 5.14.1 and 5.14.2; Replaced with rules 5.12.1 and 5.12.2	93.33	MPI	It is not completely clear who must comply with this rule.	Suggest the word 'management' is replaced with 'occupier'.	Accept in part.	Among the revised responsibilities, the occupier is responsible for defining the extent of infestation, thereby addressing the submitters concerns that <i>ever changing boundary</i> gave Horizons too much discretion.
	93.34		It is not clear here what the occupier's responsibilities are.	The wording could be improved so that it is clear what the occupier must do – how often is inspection to be carried out?	The rules pertaining to Karioi Forest owners have been revised to make them clearer, more certain and more enforceable. By:	
	93.35		The words 'ever changing boundary' are not clear; the Karioi Forest Mixed Species Plantation Area is defined in the Glossary as the identified are on map 5.8 – how will that be changed in future?	If the boundary is expected to change within the life of the plan, then it would be better to provide that the boundary of the Karioi Forest Mixed Species Plantation Area can be changed from time to time by Horizons and set out the criteria to apply to such changes. It is important to set such criteria so the Council is not given too wide a discretion to change the boundary.	Identifying that it is the occupier of land in the Karioi Forest Zone who is responsible to comply with these rules; Defining what their responsibilities are;	
	93.36		If this intended to be a mandatory rule, suggest it say that the area 'must be inspected' rather than 'will be inspected'.	Amend as suggested.	Removing the words " <i>ever changing boundary</i> " and replace with an obligation on occupier to provide a map of current infestation; Including 'must' as a more directive requirement.	
Table 5-11	93.45	MPI	To comply with the NPD, the plan must state what is intended to be achieved in the first 10 years of the plan.	As this objective refers to the plan duration, cl 4(1)(f) needs to be complied with.	Accept. The Plan now stipulates what is intended to be achieved in first 10 years of the Plan, in accordance with the NPD.	
88. Yellow bristlegrass						
Section 5.7.4	46.12	Federated Farmers	Federated Farmers supports the recent inclusion of yellow bristle grass in the Plan. It is considered to be an aggressive and invasive weed that is rapidly being spread onto farms from roadsides and contractors. We also note that the grass seed has the ability to get under the skin of sheep and cause animal health	That a rule is included in the Plan to ensure quarries and occupiers of transport corridors control all yellow bristle grass.	Accept in part through inclusion of a rule for roading authorities.	Management of quarries is more difficult. They will need to adhere to the Good Neighbour Rule and otherwise a pathway management plan would be a more appropriate approach that Horizons

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			concerns, which has in the South Island restricted the transportation of affected sheep to other areas. Federated Farmer submits that a rule is also included in the plan which demands the occupiers of quarries and transport corridors throughout the region must control all yellow bristle grass in quarries and on transport corridors of land occupied.			may consider in future.
Section 5.7.4	81.8	KiwiRail	Yellow Bristle Grass and Tutsan have been identified as largely infesting roadsides/cuttings and waste ground. These species have not been included in some Plans. Direct control or a regulatory approach has been not considered to be necessary, appropriate, or cost effective. This amounts to weed hygiene rather than any significant effect on agricultural production or biodiversity values. Infestations have been identified via stock movement and hay/silage for YBG.	Consider removal Yellow Bristle Grass and Tutsan in the [Plan]	Disagree.	In lieu of a pathway management plan, the Progressive Containment approach is a suitable category for managing this species where new or light infestations can be eradicated and spread managed through Good Neighbour Rules.
89. Yellow ragwort						
Section 5.7.4	51.10 (part)	DOC	The objective of containing or reducing the geographic spread of these pests, and the basic test that greater benefits accrue by attempting to control these pests under a Plan than not, may not be met.	Develop sustained control objectives for these pests if a positive CBA can be demonstrated, else do not include these species in the [Plan].	Disagree. The Analysis of Benefits and Costs shows that the Progressive Containment approach to halt the further spread of broom and the elimination of small infestations is cost beneficial. The Good Neighbour Rule has been amended to include a specific distance to which boundaries need to be kept clear. This is based on the main dispersal distance of yellow	The Approved Management Plan concept has been introduced to provide some flexibility on the timing and extent of intervention needed, so long as the objectives of the Plan are met through the alternative methods agreed on for managing the pest.

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Officer recommendation	Discussion
					ragwort.	
90. Yucca						
Table 5-4; Proposed Strategy Section 5.3; Proposed Strategy Table 1;	48.3;	Forest & Bird	There is currently a significant infestation of yuccas in the dunes around Foxton Beach as a result of dumping of garden waste. Spread of yuccas poses a significant threat to the Manawatū Estuary Ramsar site and the coastal dune system of the Horowhenua and Manawatū districts if they are not eradicated before they spread too far, particularly as they have the ability to re-grow after poisoning and have the hallmarks of a significant environmental weed.	Include yucca (Yucca spp.) in [Table 5-4 – Eradication pests].	Note submission, with no change to the Plan at this stage.	Further investigation of this potential pest would be required and there is the ability to elect to have this pest on the list of species to investigate for future Plans or to undertake management of this pest under non-regulatory site-led work.
	48.17		Forest & Bird supports the investigation into pink ragwort as a potential pest plant species and would like this list expanded to include yuccas.	Include yucca (Yucca spp.) in Table 1 of potential pest plant species to investigate.		

