



Manawatu-Wanganui Regional Pest Management Plan

Plan Submissions

Decisions Report

August 2017
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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 consideration of submissions and an amended proposal, Council directed preparation of the Regional Pest Management Plan (Plan) in accordance with section 73 of the Biosecurity Act 1993 (Act), in June 2017.

Having considered the statutory requirements of the Act, the Council resolved to approve the Plan on 29 August 2017.

Section 75(2) of the Biosecurity Act 1993 requires the Council to prepare a report setting out the Council's reasons for accepting or rejecting submissions. It must also record Council's decision on the Plan. This report has been prepared in satisfaction of this requirement.

The report is a compilation of the response to submissions throughout the plan process. 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 included in the table are derived from the *Summary of Submissions* which was prepared for the April 2016 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 there has been every attempt 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 Council will also provide public notice of its decision on the Plan and where the Plan can be read on 4 September 2017.

Submission analysis and recommendations

Draft Plan reference	Submission No.	Submitter	Summary of Submission	Summary of Decision requested	Council Decision	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. 	Noted. Minor addition to Section 5.3.5 to note that MOUs will be publically available.	<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.	Accept. 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.	
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

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						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.	

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			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

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			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		

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			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 break-down 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.</p> <p>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 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; Section 8 of the proposed Strategy	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.
	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 trail 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. These rules have been replaced with Clear Land Rules that more explicitly define the thresholds for pest management.
	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].		
	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.	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.	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 through 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.	Include the requirements of S.70 and S.71 more fully into the [Strategy].	Preference is now given to using Horizons' Annual Operational Plan as the main document that contains the specifics for implementing the non-regulatory measures	

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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. 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	<p>accrue by attempting to control these pests under a Plan than not, may not be met.</p> <p>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.</p>	<p>demonstrated, else do not include these species in the [Plan].</p> <p>Place broom and gorse in a Sustained Control Programme.</p>	<p>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.</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>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>
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	<p>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.</p> <p>The government of the time permitted</p>	Horizons investigates securing government funding to eradicate Canada geese.	<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, identify animals for investigating for future Pest</p>

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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	<p>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 in 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.</p> <p>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.</p> <p>We also believe that the geese have contributed to the spread of Purple Loosestrife.</p>	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	<p>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.</p> <p>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.</p> <p>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</p>	<p>The addition of Canada goose to Section [5.6] as an eradication species.</p> <p>Removal of Canada goose from Strategy Section 5.4 as potential pest.</p>	<p>Note submission, with no change to Plan.</p> <p>Nothing in the Plan precludes Council from approving funding for management for 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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			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. 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>	<p>Eradication of Canada goose from the Lake Horowhenua area.</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>

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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 (Akebia quinata) as a regional pest, as in the thorough analysis by Waikato Regional Council (attached to the submission). Akebia 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. <i>Cotoneaster pannosus</i>						
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	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 compliant 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.	
	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.	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, sites, wahi tapu, and taonga.	
	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	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.	

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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.	Rabbiter 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>	Note submission.	Changes to Good Neighbour Rule address this submission, including the addition of the Modified McClean Scale as above.
Section 5.8.2	92.2	NZDF	Rabbits should not be on this list.	Alternatively remove rabbits from Table 5-17.	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.	
Section 5.8.2	92.9	NZDF	NZDF supports the general approach to rabbit management in the Proposed	a. Include a target level in each aim and the concept of multiple	Accept in part.	A single threshold is simpler (than multiple target levels

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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>	<p>That Horizons continues to seek an outcome focused approach to pest management, as outlined in the Plan.</p>	<p>rules and Plan, rather than offering an "out".</p>	

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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. 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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			<p>requirements. This also involves significant economic consequences that would need to be considered.</p>	<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>	<p>Amendments to biocontrol references as outlined above.</p>	

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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	<p>and the basic test that greater benefits accrue by attempting to control these pests under a Plan than not, may not be met.</p> <p>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.</p>	<p>positive CBA can be demonstrated, else do not include these species in the [Plan].</p> <p>Place broom and gorse in a Sustained Control Programme.</p>	<p>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.</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 gorse.</p>	<p>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>
40. Hare						
Table 2-1	92.2 (part)	NZDF	<p>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).</p> <p>Based on the description of rabbits in Table 5-17 they would be better managed under a site-led control strategy.</p>	<p>Add hares, goats, pigs and possibly Canada goose to Table 2-1.</p>	<p>Note submission with no changes to the Plan.</p>	<p>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.</p>
41. Health and Safety						
Proposed Strategy	47.4	Bushy Park Trust	<p>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.</p>	<p>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.</p>	<p>Note submission with no changes to the Plan.</p>	<p>The important aspects of volunteer health and safety are addressed in site management arrangements and operational planning outside the auspices of the Plan.</p>
42. Heather						
Table 2-1	92.2 (part)	NZDF	<p>NZDF considers that the following additional plant species should be included in the Plan - crack willow,</p>	<p>Amend Table 2-2 and other parts of the Plan as necessary to include crack willow, Corsican</p>	<p>Note submission with no changes to the Plan.</p>	<p>The main issue with heather is its extensive planting and continued</p>

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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 plan 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 Waiinu.	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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			<p>consideration the Transport Agency's Relationship Proforma Manual (SM033). The MOU will cover the agreement on:</p> <ol style="list-style-type: none"> 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 		<p>Agency (section 4.3.2.5 in the Proposal) has been removed in place of an expanded section on MOUs (as described above).</p> <p>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.</p>	
	25.8		<p>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'.</p>	<p>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.</p>		
	25.9		<p>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.</p> <p>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</p>	<p>No decision sought on Plan.</p> <p>Provides guidance on potential MOU relationship.</p>		

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Section 5.3.5	46.6	Federated Farmers	<p>to discuss and adjust if necessary.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>That any MoU will be a publicly available document to aid transparency.</p>	<p>Accept.</p> <p>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.</p> <p>Minor revision to Section 5.3.5 to note that MOUs are publically available.</p>	
Section 5.3.5	51.23	DOC	<p>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.</p>	<p>Review and revise this section.</p>	<p>Accept.</p> <p>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.</p>	<p>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.</p>
Section 5.3.5	81.1	KiwiRail	<p>Has not been involved in consultation during development. Can add value to</p>	<p>Engage with KiwiRail to discuss and agree on the most</p>	<p>Note submission.</p>	<p>.</p>

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			Plan by meeting and agreeing about practical responses that are capable of being undertaken within the operational requirements and financial means of the company.	appropriate plan rules in relation to management of pests on the rail corridor, as part of developing the PPMP. 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	Rules to contain reference to Approved Management Plans as an agreed method of meeting the objectives of the Plan. Further discussions can occur.	
	81.9		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.	Retain a Memoranda of Understanding (MOU) option for KiwiRail (to be discussed). 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.		
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.	Accept in part through revision to monitoring sections as described below. 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.	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>	the Clear Land Rule, the Plan aims to further reduce the extent of this species.	implementation of the Plan but it does not require a change to the plan itself.
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	<p>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".</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>	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.	<p>Note submission.</p> <p>Noting the change to the Good Neighbour Rule and the Clear Land Rule, the Plan aims to further reduce the extent of this species.</p>	<p>Support noted.</p> <p>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.</p>
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"	<p>Accept.</p> <p>Suggested wording added to the outcomes in relevant sections of the Plan (including the Purpose (Section 1.3).</p>	
	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.	<p>Accept in part.</p> <p>Add the ability to have "approved management plans" to the rule streams that affect rail authorities.</p>	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	<p>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).</p> <p>Based on the description of rabbits in Table 5-17 they would be better managed under a site-led control strategy.</p>	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.
	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.		
						In localised areas pigeon

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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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			keep doing this work. The group does not want to see Pink Ragwort get out of control while Horizons investigates further.			investigate for future Plans.
	46.14	Federated Farmers	<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.		
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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			<p>suggest that “today’s level” is a meaningful target unless the desired outcomes are described.</p> <p>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.</p>		<p>sustained control category.</p> <p>Introduction of the targets for possum numbers within buffer distances defines scope of responsibility placed on occupiers.</p>	
Section 5.8.1; Table 5-21	75.1	Philips	<p>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.</p> <p>I support the good neighbour ideas and would like this to be extended in an appropriate form to encourage everyone to take responsibility.</p> <p>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.</p>	<p>More public awareness and promotion – primary school talks and pamphlets.</p> <p>Encourage the public to see Horizons as the coordinators rather than the ones doing all the work.</p> <p>An annual possum shoot over a week or a month.</p>	Note submission, with no changes to the Plan.	These are operational matters for consideration.
Section 5.8.1; Table 5-21	90.1	Jones	<p>Continue the work done. It is nice not to have possums chewing through the orchard and roses.</p>	Continue the programme	Note submission and support.	
Section 5.8.1; Table 5-21	91.16	Waikato Regional Council	<p>a. We acknowledge the considerable undertaking of a possum Control Operation programme and the progress toward achieving region wide coverage.</p> <p>b. The [Strategy] contains a more detailed background and analysis of the</p>	<p>a. None sought.</p> <p>b. Include a cross reference in Table 5-17 of the RPMP to the more substantial background in the [BSP].</p>	<p>Note submission and support. Accept submission where change or clarity sought, as per below.</p> <p>The “Reasons for Inclusion” and a revision of 5.8.1 now</p>	<p>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</p>

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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 Mokauti 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. Objective and aims in table 5-21 state what will be intended in first 10 years of the Plan.	
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			<p>all occupiers in the region. It is difficult to see how cl 8(1)(c) of the NPD can be satisfied].</p> <p>Also the wording needs to be clearer about who can require the occupier to act.</p>	clearer about who can require the occupier to act.	<p>the Good Neighbour Rules.</p> <p>The Good Neighbour rules now include a threshold of infestation and buffer distance to be managed (to only manage spread).</p> <p>There is no longer a requirement for a person to be "required to act".</p>	<p>Good Neighbour Rule was supported through analysis undertaken as per the NPD.</p> <p>The requirement to act is embodied in the description of the programme, as opposed to the rule.</p>
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 'Specie 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.	<p>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.</p> <p>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.</p> <p>The means by which</p>
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.		

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						Horizons might consider non-regulatory approaches would be through annual operational planning.
Table 2-2	26.1	Bulloch	<p>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.</p> <p>Adverse effects of Privet are:</p> <p>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.</p>	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.	<p>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.</p> <p>The means by which Horizons might consider non-regulatory approaches would be through annual operational planning.</p>
	26.2		<p><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.</p>	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		<p>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.</p>	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 co-ordinate 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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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 Roading 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 put 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.</p> <p>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	In revised section 2.1, retention of the list of	

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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 re-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	<p>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.</p> <p>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.</p> <p>Federated Farmers is also supportive of the good neighbour rule being applied and consider this will assist in controlling Tutsan spread.</p>	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]	<p>Disagree.</p> <p>Analysis shows that there is potentially a significant cost to individual occupiers in the agricultural sector if this pest is left to expand.</p>	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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			<p>engage with us on any site related issue raised by WRC specifically over pampas.</p> <p>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>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</p>
87. Wilding conifers						
Section 5.7.1	25.29	NZ Transport Agency	<p>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:</p> <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.	<p>Accept.</p> <p>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.</p>	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 Regional Council	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 Regional Council	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; Removing the words " <i>ever changing boundary</i> " and replace with an obligation on occupier to provide a map of current infestation;	
	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.	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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			<p>concerns, which has in the South Island restricted the transportation of affected sheep to other areas.</p> <p>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.</p>			may consider in future.
Section 5.7.4	81.8	KiwiRail	<p>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.</p>	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	<p>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.</p>	<p>Develop sustained control objectives for these pests if a positive CBA can be demonstrated, else do not include these species in the [Plan].</p>	<p>Disagree.</p> <p>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.</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 dispersal distance of yellow</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>

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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.		