

# **PROPOSED BIOSECURITY STRATEGY**

## **Submissions**

**Notified Tuesday 28 August 2018**

## SUBMISSIONS GUIDELINES

The report is a collation of submissions received on the proposal for a Proposed Biosecurity Strategy.

Each submitter has been given a unique number and the submission point is coded against the plan provision, as shown below.

| <b>Sub ID &amp; Sub Point</b> | <b>Submitter</b> | <b>Provision</b> | <b>Position</b> | <b>Submission</b> |
|-------------------------------|------------------|------------------|-----------------|-------------------|
| 900.5                         | BLOGGS Joe       | Rule 19          | Support         | Retain.           |



Sub ID is the submitter identification number (900) and Sub Point is the 'coding' of the submission (5).

## General comments on strategy

| Sub ID & Sub Point | Submitter                        | Provision | Position | Submission  |
|--------------------|----------------------------------|-----------|----------|---|
| S-37/1             | Federated Farmers of New Zealand | General   | Support  | Overall position: Federated Farmers supports the Strategy's overall intent and methodology.   |
| S-37/4             | Federated Farmers of New Zealand | General   |          | <p><u>Criteria for escalation</u></p> <p>Federated Farmers agrees that these are factors that must be taken into account in determining at what level decisions should be taken. However, it is not clear how these are to be applied in practice. The Strategy could be clearer on when an issue is escalated to a national level response. A decision may be made by Council's CEO or Minister depending on, for example, the risk, size of costs and benefits. However, there is no guidance as to the level at which responsibility changes over, or who decides what is "significant".</p> <p>Without clear guidelines on this, there is a risk that technical decisions based on sound science will be watered down by emotive or political considerations, and that too many issues will end up in the political arena, with consequent delays in decision taking.</p> |
| S-37/5             | Federated Farmers of New Zealand | General   |          | <p><u>Intra-regional co-ordination</u></p> <p>The strategy does not sufficiently address the difficulty of coordinating management of pests and diseases when they are spread across more than one regional area, but not nationally. Specifically, there is no mechanism or incentive for one regional council to cooperate or coordinate with another on preventing the spread of pests and diseases into currently pest-free regions. As pests in one region begin to encroach into another, or when the pest is spread across more than one region, the respective Councils need to make sure that their strategies are aligned.</p> <p>Federated Farmers believes that it is vital that mechanisms and processes to ensure intra-regional co-ordination are part of Southland's biosecurity response.</p>  |

| Sub ID & Sub Point | Submitter                        | Provision              | Position | Submission  |
|--------------------|----------------------------------|------------------------|----------|---|
| S-37/6             | Federated Farmers of New Zealand | General                |          | <p><u>Shared responsibility (Public involvement/awareness)</u></p> <p>Federated Farmers agrees that more effort is needed to communicate the importance of biosecurity to the general public, make clear the role they do and can play. Public “buy-in” is crucial to the effectiveness of the biosecurity system. Federated Farmers believes that very few people would know that members of the public currently detect about two-thirds of new incursions.</p>   |
| S-42/1             | SMELLIE – William & Julie        | General – domestic cat |          | <p>Page 24, Domestic Cats should be deleted as a proposed ‘Pest’ as the “adverse effects” stated on page 25 are not relevant.</p> <ul style="list-style-type: none"> <li>- The economic well-being can be disputed as the domestic cat seems to be the best option for pest control within the residential area.</li> <li>- Also can dispute cats having an impact on human health. It is proven at retirement homes that cats have a calming and relaxing affect, giving much pleasure to their owners, especially the elderly, lonely or children.</li> </ul> |
| S-58/1             | Gore District Council            | General                | Support  | The Gore District Council recognises the importance of controlling harmful and nuisance pest and biosecurity threats and endorses the continuing efforts of Environment Southland in this work.   |
| S-58/2             | Gore District Council            | General                | Amend    | <p>We have one minor technical comment to make as follows:</p> <p>Amend the current RPMS wording relating to urban areas to reflect growing towns. Where your current town boundaries are specified as “historic Borough boundaries” this needs updating to “Current Territorial Authority District Plan boundaries”.</p> <p>The above amendment will allow for growth in alignment with the SORDS strategy and will meaningful to stand the test of time without becoming obsolete.</p>  |
| S-61/1             | KING Sandra Doreen               | General                |          | I would like to see a Biosecurity Pathways Plan which includes a Marine biosecurity Pathways Plan developed for Rakiura.  |
| S-61/2             | KING Sandra Doreen               | General                | Support  | I support a Site-led Programme for Rakiura / Stewart Island   |

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|--------------------|--|-----------|---------------|---|
| S-61/3             | KING Sandra Doreen                     | General   | Support Amend | I support free micro-chipping for pet cats on Rakiura/ Stewart Island and would like to see free neutering offered also.  |
| S-61/4             | KING Sandra Doreen                     | General   |               | I would like to see possums included in the Rakiura / Stewart island site-led programme.  |
| S-66/1             | MACDONALD Allan                        | General   | Oppose        | We oppose this plan on the basis of the Treaty of Waitangi. We ask for an exemption as our land is Maori freehold land and we wish to stay independent. Resource Management Act section six and section eight.  |
| S-72/1             | Predator Free Rakiura Leadership Group | General   | Support       | We recognise the effort and energy of Environment Southland to produce a proposed Biosecurity Strategy.   |
| S-78/1             | NZ Transport Agency                    | General   |               | The Transport Agency also considers that the Council encourage discussion of alternatives and outcomes.   |
| S-82/1             | Omaui Ahu Whenua Trust                 | General   | Oppose        | We oppose this plan on the basis of the Treaty of Waitangi. We ask for an exemption as our land is Maori freehold land and we wish to stay independent. Resource Management Act, section six and section eight.   |
| S-83/1             | Otago Regional Council                 | General   |               | <p>ORC congratulates Environment Southland on the development of its proposed Biosecurity Strategy (the Strategy). ORC is undertaking a review of its approach to pest management and appreciates the importance this body of work will contribute to the success of our regions' futures. ORC welcomes the collaborative process Environment Southland has employed in developing the Strategy, including meeting with ORC staff to discuss relevant issues, including cross boundary issues.</p> <p>It is important to note that developing a Biosecurity Strategy is important so that there is a wider strategic approach to support the implementation of the proposed Plan. ORC is taking a similar approach.</p> <p>Otago and Southland share some similar pest species, including 'Organisms of Interest'. There will be ongoing opportunities for ORC and Environment Southland to</p> |

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|                    |              |           |          | consider working together on these shared areas of interests, including developing and sharing information on surveillance programmes. Lastly, ORC and Environment Southland have collaborated on criteria that can be used to identify Site-Led programmes. ORC supports this approach.   |
| S-85/1             | POHIO Tony   | General   | Oppose   | I oppose this plan on the basis of the Treaty of Waitangi. We ask for an exemption as our land is Maori freehold land and we wish to stay independent. Resource Management Act section six and section eight.  |
| S-98/1             | GOOMES Donna | General   |          | My concern is that my husband and I own approx. 15 hectares of land on Stewart Island, and that we as land owners could be subject to penalties if pests (plants/animals) were found on our property despite our best efforts to remove or control them. Just checking my garden every few days I remove pest plants, which shows how much more difficult it is in 15 hectares of Stewart Island bush. I would hope that best efforts and size of land ownership will be considered before any penalties are thought of.   |
| S-98/2             | GOOMES Donna | General   |          | Also, a request that the Biosecurity Strategy would include an offer of sprays or (a portion of sprays) to Stewart Island to achieve the desired goals. The same could be asked for possum traps.  |
| S-99/1             | GOOMES Peter | General   |          | <p>Unfortunately we do have many unwanted plants. One that has not been mentioned is Aluminium plant which is establishing in many areas around Half-moon Bay. There seems to be teams doing removal/spray on a particular plant and not covering all the unwanted plants at once. I realise there are different sprays and techniques but recovering the areas seems a waste of time having to go back with GPS or local knowledge. I have been spraying/removing unwanted plants on my 15 hectares for 60 years and improving but not winning, yet! But I try to get all I can on each section.</p> <p>The increase in deer numbers has cut out a lot of the understory plants including unwanted ones but that is a mixed blessing and is 'un-natural' bush left.</p> <p>As for the marine pest plants, I think we have to just live with what is there, having</p> |

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|                    |                              |           |          | seen the effort to remove undaria in my immediate view, However keeping them away is great, but the sea is huge as is the problem of containing them.   |
| S-124/1            | Southland Conservation Board | General   |          | <p>Priority ecosystems:</p> <p>There appears to be nowhere in the Strategy that prioritises biosecurity control in endangered and priority ecosystems. Southland contains internationally significant ecosystems such as the Ramsar wetlands and the two UNESCO World Heritage areas as well as nationally significant ecosystems including two National Parks.</p> <p>The Southland Region also contains three Topuni sites, Motupohue, Takitimu Maunga, and Tutoko. These sites have very high cultural values to both Iwi &amp; others and should have priority pest control, e.g. stopping the spread of wilding conifers into the Takitimu Mountains.</p> <p>There should be a prioritisation process written in the strategy to prevent exotic pests invading endangered &amp; ecosystems, both on public and private land, and their eradication. Such areas may require a buffer zone, similar to the proposed cotoneaster &amp; Darwin's barberry buffer on the boundary of the Fiordland National Park where eradication is mandatory.</p> <p>There needs to be a mandatory approach to dealing with priority areas rather than relying on voluntary 'site led' programmes.</p> |
| S-124/2            | Southland Conservation Board | General   | Support  | The Southland Conservation Board generally supports the proposed Southland Biosecurity Strategy and Regional Pest Management Plan subject to the comments above. The Board urges Environment Southland to provide adequate funds to the Biosecurity and Biodiversity Operations Division of Environment Southland to implement fully both the Biodiversity Strategy and the Regional Pest Management Plan when operative.   |
| S-128/1            | MAASS-BARRETT<br>Jim         | General   |          | The wisdom of the strategy is to prevent individuals/volunteers from doing a bit of their own control work, rather, leave it to ES staff or experts. However in the real world, it takes the situation to become dire then an expert or three journey out to  |

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|                    |                      |           |          | “take a look.” The pest organism barely looks up from what its doing to note the presence of “experts” then goes back to proliferating madly and spreading. Allow voluntary work.  |
| S-128/2            | MAASS-BARRETT<br>Jim | General   |          | <p>The strategy needs to encompass more than just half a dozen unwanted marine pests for example and undaria. It needs to mention the need for things such as shipping ballast water protocols (Maritime NZ has developed some), cruise ship NZ must have some, Fiordland Guardians and others, MPI?</p> <p>What agency controls the presence of bulk shipping anchored off the NE coast of Stewart Island? Who makes sure they have legally undergone their ballast water exchanges before coming near our shores. Do you know there is an out for any shop and they can “if the captain determines for reasons of safety discharge” ballast water (not mid ocean water) into our near shore waters (under 12 [illegible]) This is an incursion waiting to happen and usually with marine pests they have been around for a while before discovery and have been assisted by humans to spread.</p>  |
| S-129/1            | HINE Tony & Beth     | General   |          | <p>We live in Riverton. We grow native plants and put out food to encourage the native birds to visit, as we love them and want them to thrive. Unfortunately, a number of our neighbours think it is OK to have domestic cats as pets. Every day, one two or three different cats wander through our property, defecating, fighting and climbing our trees HUNTING BIRDS. We strongly recommend MUCH stronger restrictions on cat ownership, even banning them altogether, but at least apply high ownership fees and penalties for non-compliance. If cats are found wandering, it should be allowed, under law, to trap and have them humanely killed. If they are caught and handed to a 'cat impoundment centre', they should be kept for only three days before euthanising them. If an owner wants to retrieve it, a very large charge should be imposed on them for release of the cat. Maybe \$500 might make them wonder if it was worth keeping the cat. If the cat was caught wandering twice, the retrieval fee might be \$1,000, then, on third catch, instant euthanasia. They are an introduced pest and should be classified as vermin.</p> |

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| S-130/1            | Rakiura Titi Islands Administering Body | General   | Support  | <p>The Rakiura Titi Islands Administering Body. RTIAB. Administers a total of 18 Islands on behalf of Rakiura Maori.</p> <p>The ownership of the islands to Rakiura Maori/ Ngai Tahu Iwi, is from the outcome of the Ngai Tahu Deed of Settlement. 1997.</p> <p>Terms and outcomes from the negotiations with the Crown for the return of the Islands to Rakiura Maori. Being for the islands to treated as if they are a Nature Reserve. Subject to the traditional rights of Rakiura Maori to take Titi on a sustainable basis. Create work programmes jointly each year Rakiura Maori/Crown-DOC. To enhance the islands back as far as possible to their natural state. Prepare and completed a Management Plan for the Rakiura Titi Islands.</p> <p>The RTIAB. Submits in support on the Proposed Biosecurity Strategy and Proposal for a Southland Regional Pest Management Plan.</p> <p>The importance of the Plan supports the on going biosecurity responsibilities and management Rakiura Maori have to the Rakiura Titi Islands.</p> <p>Approx 70% of all Titi Islands are now pest free, due to either intensive trapping networks, Aerial bait drops. Bait station networks. And biosecurity practises performed by Rakiura Maori.</p> <p>Rakiura Maori are very aware of the Pest incursions and devastation that has occurred in the past onto their Islands.</p> <p>With the Islands now 70% pest free, Rakiura Maori have been involved with a number Taonga Species recovery and transfers within their islands.</p> <p>The RTIAB see the Proposed Plan as a safe guard to enhance more so the importance of biosecurity. To repair and protect the biodiversity of the Rakiura Titi Islands.</p> |

## Vision and goals

| Sub ID & Sub Point | Submitter                        | Provision | Position | Submission   |
|--------------------|----------------------------------|-----------|----------|--|
| S-37/3             | Federated Farmers of New Zealand | General   |          | <p><u>Vision and goals</u></p> <p>We generally support the vision for the Strategy. The proposed strategy must not only protect Southland from harmful species but also be mindful of social implications such as consequences to trade and travel.</p> <p>The strategy vision is, in our view too simplistic. It would be more appropriate to redefine the vision as:</p> <p><i>“The exclusion, eradication or effective management of risks posed by pests and diseases to the Southland economy, environment or social wellbeing”.</i></p> <p>We promote the alternative vision as the strategy needs to more strongly emphasise the interconnectedness of the economic and social impacts of a biosecurity failure.</p> <p>Evaluation of the strategy should seek continuous improvement of all aspects including public awareness, intra-regional coordination. Forward planning is critical to success, as efforts need to be directed at responding to the threat, rather than devising a response once identified.</p> <p>The Federation agrees that biosecurity systems need to be more focused, and better understood by all stakeholders. Effectiveness in a biosecurity response is the key attribute that the primary sector requires.</p> <p>Federated Farmers believes the key issues in ensuring this effectiveness are</p> <ul style="list-style-type: none"> <li>• Clear accountability and responsibility</li> <li>• Coordination between and within responsible agencies</li> <li>• Consistency in decision making</li> <li>• Stakeholder input – in decision making, and at operational level</li> <li>• Adequate resourcing – reflecting the importance of biosecurity to the region</li> </ul> <p>The Federation is pleased that the Strategy has retained a strong focus on the protection of land based primary production. Federated Farmers believes that</p> |

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|                    |           |           |          | <p>prevention is more effective than eradication, and consequently supports the overall shift towards a in focus of the biosecurity system towards prevention of biosecurity threats. However, this shift must not weaken the ability to initiate strong, prompt and efficient response to incursions.</p> <p>Federated Farmers concurs with the overall vision of the biosecurity strategy. However, the federation is concerned that the strategy itself is not forward looking enough, especially in terms of dealing with emerging and potential threats, taking into account changing lifestyles, social and physical landscapes.</p> <p>Federated Farmers believes that a consistent approach to managing biosecurity is vital across all aspects of the system:</p> <ul style="list-style-type: none"> <li>• risk assessment</li> <li>• decisions on type and nature of interventions</li> <li>• funding</li> </ul> |

### Executive summary

| Sub ID & Sub Point | Submitter                        | Provision         | Position | Submission   |
|--------------------|----------------------------------|-------------------|----------|--|
| S-37/2             | Federated Farmers of New Zealand | Executive summary |          | <p><u>Executive Summary</u></p> <p>Federated Farmers submits that effectiveness is the necessary key attribute for a Biosecurity Strategy. A focus on prevention is critical for effectiveness as is the maintenance of strong, prompt and efficient response to incursions.</p> <p>An effective biosecurity strategy must deal with both the present and the future and take into account emerging and potential threats.</p> |

| Sub ID & Sub Point | Submitter                 | Provision         | Position | Submission  |
|--------------------|---------------------------|-------------------|----------|---|
| S-42/2             | SMELLIE – William & Julie | Executive Summary |          | <p>Page 5 states, “ES methods will be achievable, cost effective and based on sound science and/or the best information available”. We dispute this statement your proposed regulations for Domestic Cats.</p> <p>Where is the benefit and cost analysis as required by NPD on page 10 of your S.R.P.M Plan?</p> <p>Is the ‘sound science’ or ‘best information’ just hearsay? Require more details to justify the banning of domestic cats.</p> <p>What plans do you have to eradicate rats, mice and rabbits from the township?</p> <p>Regulation and enforcement on domestic cats <u>will</u> create hostility and a very unpleasant environment to live in.</p> |

### Introduction

| Sub ID & Sub Point | Submitter                    | Provision    | Position | Submission   |
|--------------------|------------------------------|--------------|----------|--|
| S-124/3            | Southland Conservation Board | Introduction | Support  | The Southland Conservation Board’s main concern in the Proposed Biosecurity plan is the protection and enhancement of indigenous biodiversity and ecosystems from the negative effects of exotic organisms. The SCB supports the ‘Introduction’ of the Biosecurity Strategy. |

## Section 2 – Biosecurity at Environment Southland

| Sub ID & Sub Point | Submitter                    | Provision | Position | Submission  |
|--------------------|------------------------------|-----------|----------|---|
| S-124/4            | Southland Conservation Board | Section 2 | Support  | The Southland Conservation Board’s main concern in the Proposed Biosecurity plan is the protection and enhancement of indigenous biodiversity and ecosystems from the negative effects of exotic organisms. The SCB supports Section 2 of the Biosecurity Strategy. |

## Section 3 - Objectives

| Sub ID & Sub Point | Submitter                    | Provision     | Position | Submission  |
|--------------------|------------------------------|---------------|----------|---|
| S-45/1             | Real Journeys Limited        | Objective 3   |          | Under Objective 3 Real Journeys Limited suggests a Southland Regional Biosecurity Pathway Management Plan be developed within 3 years of the plan becoming operative. This should encompass Southland’s coastal marine waters; lakes and rivers and land within the region’s boundary.  |
| S-124/5            | Southland Conservation Board | New objective |          | Section 3 Objectives: The Biosecurity Strategy, and any Plans that sit underneath it, require a well-resourced Biosecurity & Biodiversity Operations Division within the Regional Council. This needs to be a priority of the Council. The Strategy, and the plans beneath it, need to be funded to a level where E.S. is not only operating in an advisory, regulatory and a monitoring role but is actively funding programs of work to reduce the biosecurity threats in Southland. There needs to be an Objective 4 that relates to the adequate resourcing of the Biosecurity Strategy and the Plans beneath it. |

#### Section 4 – Outcomes and methods

| Sub ID & Sub Point | Submitter                    | Provision | Position | Submission   |
|--------------------|------------------------------|-----------|----------|--|
| S-124/6            | Southland Conservation Board | Section 4 | Support  | The SCB largely supports this section subject to the comments above. |

#### Section 4 – Outcomes and methods – Objective 1

| Sub ID & Sub Point | Submitter                              | Provision            | Position | Submission   |
|--------------------|--|----------------------|----------|--|
| S-42/3             | SMELLIE – William & Julie              | Objective 1 - 1.1(b) |          | Page 15, Outcomes 1.1(b) “Management programmes: (b) are achievable, cost effective and based on sound science;” – as above, plus There needs to be more evidence of these proposed ‘outcomes’ before banning of Domestic Cats be ‘implemented’.   |
| S-72/2             | Predator Free Rakiura Leadership Group | Objective 1          | Amend    | Regarding the <i>Case Study box</i> (p.20): Suggest Rakiura Māori Lands Trust is included in the list of communities or agencies.  |
| S-124/7            | Southland Conservation Board           | Objective 1          |          | 1.1a & 1.2. The SCB stresses the importance of adequately resourcing the eradication of pests while they are still in the early exponential stage of spread. It is far cheaper to even borrow money for an early eradication than fighting long term control. (If the mid Dome conifers had been dealt with successfully twenty years ago it would have been far cheaper than the eradication process happening now). Most pests that are named as ‘progressive containment’ pests in appendix 2 are still very much in the exponential expansion phase of spread.<br><br>More emphasis needs to be put into management of these species to limit their spread within the progressive containment areas with measurable reduction in infestations. |

| Sub ID & Sub Point | Submitter | Provision | Position | Submission  |
|--------------------|-----------|-----------|----------|---|
|                    |           |           |          | Cotoneaster & Darwin's Barberry are good examples of where the mapped containment area is virtually the whole of mainland Southland but there are only scattered infestations throughout – now is the time for a shrinking containment policy. These species are poised to become rampant throughout Southland. |

#### Section 4 – Outcomes and methods – Objective 2

| Sub ID & Sub Point | Submitter                              | Provision   | Position | Submission   |
|--------------------|--|-------------|----------|--|
| S-42/4             | SMELLIE – William & Julie              | Objective 2 |          | Page 22, “Guidance for amending or creating new site-led programmes.” A site-led programme on private property should <u>only</u> be designated of complete agreement is obtained from the land owner. – It is totally unacceptable and will not be achievable to classify a site-led programme or private property without owners consent!  |
| S-45/2             | Real Journeys Limited                  | Objective 2 |          | Under section 2.3 Real Journeys Limited asserts that a reliable and credible source of biosecurity information be created. This would be a collective list on pest species that are known to be a potential threat to New Zealand. This would provide reliable information to the people and organisations of Southland. Real Journeys Limited believes this list should be created with information supplied by: Department of Conservation, NIWA and the Ministry of Primary Industries. |
| S-72/3             | Predator Free Rakiura Leadership Group | Objective 2 | Support  | We acknowledge and support the Stewart Island / Rakiura site-led programme approach described.   |
| S-72/4             | Predator Free Rakiura Leadership Group | Objective 2 | Amend    | Consider including an additional bullet <i>Environment Southland will seek to work collaboratively with, and learn from, the community and from other agencies.</i>  |

| Sub ID & Sub Point | Submitter                    | Provision   | Position | Submission  |
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| S-124/8            | Southland Conservation Board | Objective 2 | Support  | The SCB is generally supportive of this objective. Site-led programmes for priority ecosystems should be mandatory and led by the Regional Council. |

#### Section 4 – Outcomes and methods – Objective 3

| Sub ID & Sub Point | Submitter             | Provision   | Position | Submission   |
|--------------------|-----------------------|-------------|----------|--|
| S-45/3             | Real Journeys Limited | Objective 3 |          | Real Journeys Limited would like Environment Southland to consider the implications regarding biosecurity due to; cruise ships and vessels carrying ballast water entering the coastal marine waters of Fiordland.   |
| S-45/4             | Real Journeys Limited | Objective 3 |          | Real Journeys Limited would like Environment Southland to ensure that the right plant is planted in the right place. Real Journeys Limited contends that it would be helpful if Environment Southland develops, within three years of the plan being operative, ecological guidelines for the region which provides direction regarding the appropriate location for native species to be planted across Southland. Native species need to be planted where they are endemic otherwise they act as pest, such as, <i>Pseudopanax laetus</i> in Milford Sound <sup>1</sup> and; <i>Comptosia repens</i> plantings undertaken by the Invercargill City Council. <i>Comptosia repens</i> seeds have spread to the Titi Islands. This <i>Comptosia</i> species is mainly endemic to the North Island, it is now inhibiting Titi and Blue Penguin's ability to burrow on the Islands. Ecological planting guidelines for the region would help protect the endemic biodiversity of Southland. |
| S-45/5             | Real Journeys Limited | Objective 3 |          | Under site-led programmes: Rakiura / Stewart Island and Omaui, Real Journeys Limited contends Predator Free Rakiura cited as a group Environment Southland will work with, to control established species that can be eradicated or contained on the   |

<sup>1</sup> George Ledgard, Department of Conservation, Te Anau Office

| Sub ID & Sub Point | Submitter                              | Provision   | Position | Submission  |
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|                    |  |             |          | Island.   |
| S-72/5             | Predator Free Rakiura Leadership Group | Objective 3 |          | We would like to see a Stewart Island/Rakiura specific biosecurity Pathway Management Plan developed. This would be a helpful tool to support steps towards a Predator Free Rakiura.  |
| S-72/6             | Predator Free Rakiura Leadership Group | Objective 3 |          | We would like to see Environment Southland staff authorised and resourced to carry out annual biosecurity surveillance and inspections for predators on Stewart Island/Rakiura. We would like to see Environment Southland staff authorised and resourced to carry out pest control advocacy and education throughout the lifespan of the plan.   |
| S-78/2             | NZ Transport Agency                    | Objective 3 |          | <p><i>“Assistance and advice are followed up with enforcement when required.”</i> The Transport Agency asks that enforcement options are considered as a last resort. This statement suggests that there are no intermediate options available to achieve biosecurity outcomes. We wish to see better collaboration with landowners/occupiers in managing pests in the region.</p> <p>Modification requested: Adjust wording to reinforce that working together achieves better outcomes.</p>   |
| S-124/9            | Southland Conservation Board           | Objective 3 | Support  | <p>The SCB is generally in support of this objective. The pests specified in the Strategy appear to be all macroscopic organisms. Does the strategy have scope to cover infectious diseases? This appears to be an area of biosecurity not covered by the Strategy.</p> <p>There needs to be regulations directed at the spread of wilding conifers. The spread of conifer seed from plantation forests is a serious threat to indigenous ecosystems in Southland. Conifer seed can blow several kilometres from its source trees.</p> <p>Regulations should be in place to prohibit future plantation forestry with invasive species in areas with high risk of invasion in Southland.</p> <p>Regulations should be in place to enforce the removal of wilding conifers, before they</p> |

| Sub ID & Sub Point | Submitter | Provision | Position | Submission  |
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|                    |           |           |          | cone, downwind of any plantation forestry by the plantation owners. |

### Appendix 1 – Proposed biosecurity operations plan

| Sub ID & Sub Point | Submitter                              | Provision  | Position | Submission  |
|--------------------|--|------------|----------|---|
| S-42/5             | SMELLIE – William & Julie              | Appendix 1 |          | <p>Page 32, “Containment of cats” states “Advocacy and education will be the main tool that is used. During the first year we will also subsidise cat microchipping programmes.”</p> <p>Again we refer to “achievable and cost effective”. Already cats in the township are being deliberately poisoned or going missing! Do you think locals will go to the expense when this is happening? If advocacy and education is the main tool, what are the other tools to be used?</p>   |
| S-45/6             | Real Journeys Limited                  | Appendix 1 |          | <p>Under primary methods and education. Real Journey Limited suggests Environment Southland upgrades Environment Southland’s search function on its website. Information regarding biosecurity is not easily located on the current website. Hence, an improved search function as well as ensuring biosecurity information is placed clearly within the site, would enhance the Council’s digital tools. Real Journeys Limited believes Environment Southland should review the “Check, Clean, Dry” Programme as this is primarily associated with Didymo. Real Journeys Limited would also like Environment Southland to enhance advocacy and education on biosecurity, through a more direct approach with recreational boating and angler societies in Southland.</p> |
| S-72/7             | Predator Free Rakiura Leadership Group | Appendix 1 |          | <p>(p.29) – The annual inspections for exclusion and eradication pests seems to be too infrequent for <i>high-risk sites</i>, especially for animal pests with a short breeding cycle.</p>  |

| Sub ID & Sub Point | Submitter                              | Provision  | Position | Submission  |
|--------------------|--|------------|----------|---|
| S-72/8             | Predator Free Rakiura Leadership Group | Appendix 1 | Amend    | Regarding the <i>Operational Plan Site-led programme table</i> (p.32), we would like to see Rakiura Maori Lands Trust named alongside DOC and SIRCET given the proportion of land managed by the Trust.   |
| S-72/9             | Predator Free Rakiura Leadership Group | Appendix 1 |          | Regarding the <i>Operational Plan Site-led programme table</i> (p.32), we would like to see subsidised or free micro-chipping and neutering of all existing and new domestic cats on Stewart Island/Rakiura for the duration of the Strategy term. We would like to see the management of domestic cats and support to cat owners regarding responsible cat ownership resourced. We would like to see micro-chipping and neutering of domestic cats visiting the island to be a requirement of their visit. |
| S-124/10           | Southland Conservation Board           | Appendix 1 | Support  | Exclusion pests: The SCB support this programme.  |
| S-124/11           | Southland Conservation Board           | Appendix 1 |          | Eradication Pests: The SCB are concerned over the word 'control' where in this context the word eradicate should be used.   |
| S-124/12           | Southland Conservation Board           | Appendix 1 |          | Progressive containment: As stated above there is not enough emphasis on reducing the pest numbers within the containment area and the reduction in size of the containment area. There should be priority eradication areas within the containment area where there are priority ecosystems.   |
| S-124/13           | Southland Conservation Board           | Appendix 1 | Support  | Sustained Control Pests: The SCB support this programme. There needs to be flexibility especially with possums to move to a higher category to fit with the aspirations of PF2050 to eradicate predators.   |
| S-124/14           | Southland Conservation Board           | Appendix 1 | Support  | Organisms of interest: The SCB support this programme. A 4th bullet point should be added "Specific organisms of interest should be eradicated before they become invasive."  |
| S-124/15           | Southland Conservation Board           | Appendix 1 |          | Site-led programmes: New site led programmes should be advocated for in priority ecosystems where there is a threat of pest invasion or where pests have the potential to cause the collapse of ecosystem integrity. The SCB supports the microchipping of  |

| Sub ID & Sub Point | Submitter | Provision | Position | Submission  |
|--------------------|-----------|-----------|----------|---|
|                    |           |           |          | <p>domestic cats and the eradication of feral cats from site-led programme areas.</p> <p>The SCB submits the that the inclusion of both white-tailed and red deer are included in the site-led programme for Stewart Island. Deer have become a major pest within the urban and peri-urban areas around Oban, Stewart Island outside of public conservation land.</p> |

## Appendix 2 – Pests

| Sub ID & Sub Point | Submitter                              | Provision  | Position | Submission   |
|--------------------|--|------------|----------|--|
| S-72/10            | Predator Free Rakiura Leadership Group | Appendix 2 |          | We would like to see possums specifically identified as part of the Stewart Island/Rakiura site-led programme in the <i>Pest Animals table</i> (p.33).   |
| S-79/1             | O'CALLAGHAN Louise                     | Appendix 2 |          | <p>I wish to submit the following:</p> <ul style="list-style-type: none"> <li>- That wilding Sycamores (<i>acer pseudoplatanus</i>) are a significant pest plant threat to Southland, capable of adversely impacting productive farmland, and the landscapes and natural ecosystems of Southland, yet are not mentioned in the proposed plan.</li> </ul> <p>They are greatly established (almost as a small forest) in the Mimihau valley, Wyndham, and along highways at Mabel bush, Waimahaka, Glenham, and other high localities such as footpaths at Waikawa in the Catlins, and the edge of New River estuary at Riverton.</p> <p>That the rate of dispersal and vigour of this species over a range of habitats, is such that identification and control of this pest plant species is urgent.</p> <p>Overseas evidence is that this species has major adverse affect on land use and landscapes, and economic well-being, and environment, and that sycamore out-competes any other plants and over-grows even native canopy trees, rapidly forming</p> |

| Sub ID & Sub Point | Submitter                    | Provision  | Position | Submission  |
|--------------------|------------------------------|------------|----------|---|
|                    |                              |            |          | <p>dense pure sycamore thickets/forest where nothing else grows, and which cannot be controlled. Evidence at other NZ locations such as Skippers illustrate that the rate of spread of this species outpaces that of wilding pines.</p> <p><u>I would please urge that this species be labelled as an exclusion plant in Southland.</u></p> <p>Investigation, monitoring , and reporting of the extent, and speed of spread of this pest plant species in Southland is please urgent, to fill a knowledge gap:</p> <p>I would argue that the wilding Sycamores will be the major plant pest species in the decades ahead in terms of modifying southland landscape and habitat and impacting on tourist and amenity values, in specific locations .</p> <p>I would please urge Councillors to visit the Mimihau Valley, Wyndham to see first hand the potential scale and speed of this threat.</p> |
| S-124/16           | Southland Conservation Board | Appendix 2 |          | <p>Pests. The SCB suggests that: African Club moss be elevated from a site-led pest to one of eradication Southland wide. This plant is a serious pest where it gets into indigenous ecosystems and is almost impossible to remove once it gets past the establishment phase. It is also a major pest in shaded urban gardens.</p>  |
| S-124/17           | Southland Conservation Board | Appendix 2 |          | <p>The recent discovery of Selaginella in a Te Anau nursery could have serious consequences for Fiordland ecosystems. There needs to be regulations to ensure its eradication.</p>  |
| S-124/18           | Southland Conservation Board | Appendix 2 |          | <p>Heather is also a pest with a high invasion potential into indigenous ecosystems and once established is very hard to eradicate. Heather needs to be elevated from progressive containment to eradication in areas bordering vulnerable priority ecosystems.</p>   |
| S-124/19           | Southland Conservation Board | Appendix 2 |          | <p>Chilean Flame Creeper is a plant that is also highly invasive in regenerating bush habitats and should be added to the Pest plant list.</p>  |
| S-124/20           | Southland Conservation Board | Appendix 2 |          | <p>Feral Cats need to be added to the list of pests for progressive containment. Also E.S. should advocate strongly for all domestic cats in Southland to be registered and</p>   |

| Sub ID & Sub Point | Submitter            | Provision  | Position | Submission  |
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|                    |                      |            |          | Microchipped.   |
| S-128/3            | MAASS-BARRETT<br>Jim | Appendix 2 |          | Add a plant species coprosma grandifolia (Kanono) to pest list of plants on Stewart Island, it is taking over roadsides and other open ground especially, it produces copious quantities of bird spread berries, its seeds can geminate in very low light conditions. Fortunately it is palatable to deer, which slows down the establishment of many seedlings.  |
| S-128/4            | MAASS-BARRETT<br>Jim | Appendix 2 |          | <p>In Appendix 2 where pests are categorised, there is a blindingly obvious anomaly. The first three outcomes described, exclusion, eradication and progressive containment are a joke. Unless there is active and ongoing programmes to achieve the desired level of control, nothing happens except the organism proliferates and spreads, which usually is what occurs.</p> <p>Take the invasive pest algae undaria for example, progressive containment cannot work where there is no effort of any kind made to remove it. The category is wrong or the Council must be willing to fund control work, where this classification is used or Council must work with other involved agencies to allow people to harvest from not only man made structures, also natural features.</p> |

### Appendix 3 – Organisms of interest

| Sub ID & Sub Point | Submitter                       | Provision  | Position | Submission  |
|--------------------|---------------------------------|------------|----------|---|
| S-124/21           | Southland<br>Conservation Board | Appendix 3 |          | Organisms of interest. Tahr should be added to the organisms of interest as it has the potential to easily spread over the Southland boundary from a feral herd in Otago. |