

Attachment A: Key submission themes and recommended amendments to the Proposed Regional Pest Management Plan based on consultation feedback

Staff are working through detailed submissions to determine changes that are required to be made in the final Regional Pest Management Plan. Table 1 below shows the three most common themes of suggested changes to the proposed plan grouped under each of the consultation question topics. For each suggestion a proposed staff response is also shown. Note that for some of these themes there may have been equal or more responses with the opposite view point. As those responses did not request a change to the proposed plan they have not been included here.

Table 1: Key submission themes

Key programmes	Submitter suggestions	Proposed staff response	Staff recommendation	Recommended amendments to the proposed plan
Pests on parks	Suggest working with communities/community groups	The operational implementation of buffer rules around parks will involve a proactive communications and engagement component to encourage landowners to recognise and voluntarily remove pest plants, supported by rule enforcement when required. The natural environment targeted rate will also provide for enhanced facilitation of community conservation groups through Pest Free Auckland.	Accept	Retain approach from proposed plan
	Suggest expansion of sites included in parks programme	The budget determined through the natural environment targeted rate does not provide for control and enforcement at all sites identified in the proposed plan. The spatial extent of the parks programme has been reduced to fit the targeted rate budget, with the highest ecological value sites retained. Enforcement is less cost-effective than on-park control. Therefore, the recommended	Reject	Reduce spatial extent of site-led programme to fit within the budget provided through the Natural Environment Targeted Rate

		<p>approach is to prioritise on-park control, and extend enforcement only to highest priority sites.</p> <p>However, beyond the statutory programmes set out in the Proposed Regional Pest Management Plan and funded through the Natural Environment Targeted Rate, council will continue to be able to undertake some additional pest management on other council-managed parkland as part of council's general land owner functions funded by general rates.</p> <p>The natural environment targeted rate also provides for the council to increase support to community conservation activity in and around other high value parkland through Pest Free Auckland.</p>		
	Suggest public communications and engagement	The operational implementation of buffer rules around parks will involve a substantial communications and engagement component to encourage landowners to recognise and voluntarily remove pest plants, supported by rule enforcement when required.	Accept	Retain approach from proposed plan
Kauri dieback	Support the closure of Waitākere Ranges	The proposed plan was drafted prior to the announcement of the rāhui and subsequent closure of the ranges. The operative plan will be updated to reflect these events.	Accept	Update operative plan to reflect the council's support of the rāhui and park closures.
	Suggest additional park or track closures.	High risk tracks have been closed within the Hunua Ranges, to protect Hunua kauri. At time of writing a small number of further closures have been made on the North Shore. The council may choose to close or re-open tracks over the next 10 years outside of	Accept in part	Update operative plan to reflect the council's support of the rāhui and park closures.

		the Regional Pest Management Plan framework. The operative plan will be updated to reflect park closures, but not all sites suggested by submitters may be included.		
	Suggest further research, sometimes in conjunction with concern over lack of scientific certainty	The proposed approach recognises that kauri dieback management is challenging due to knowledge gaps, and that further research is an important component of kauri dieback management. The council contributes to research alongside other partner agencies including the Ministry for Primary Industries and the Department of Conservation.	Accept	Retain approach from proposed plan
Pest spread to Hauraki Gulf Islands	Disagree with inclusion of cats as a pest (variety of reasons including animal welfare, concern over implications for companion animals).	The Hauraki Gulf Islands are a globally significant sea bird hotspot. Over half the islands in the gulf are free of mammalian pests and are important sites for species reintroductions and conservation. Cats are one of several pressures that require management on Hauraki Gulf Islands to safeguard threatened species and prevent species extinctions. Many submitters expressed concerns regarding risks to pet cats. In many instances these are perceived rather than actual risks, with submitters assuming much more extensive cat control than is likely in practice. The council always seeks to use best practice methods which comply with all relevant legislation and are as humane as possible. While staff consider the approach set out in the proposed plan remains sound, staff are	Accept in part	Staff are not recommending any substantive changes to the current proposed approach. Staff are considering changes to how this programme is described, in particular: the possibility to refer to unowned cats rather than pest cats.

		exploring options for mitigating these concerns in the wording of the final plan.		
	Suggest public communications and engagement	The operational implementation of the plan will involve a substantial communications and engagement component to encourage voluntary behaviour change to reduce pest spread to islands. Rule enforcement would be used as a last resort.	Accept	Retain approach from proposed plan
	Do not support use of toxins	The Regional Pest Management Plan sets outcomes for pest management in the region but does not specify methods, therefore this submission theme is not applicable to the statutory plan. The council always seeks to use best practice methods which comply with all relevant legislation and minimise the use of toxins where possible.	Reject (not applicable)	Retain approach from proposed plan
Aotea Great Barrier	Suggest working with Aotea Great Barrier community	Staff acknowledge that working with the Aotea Great Barrier community will be pivotal to this programmes success. Operational delivery of the programme will therefore include in-depth community engagement.	Accept	Retain approach from proposed plan
	Do not support use of toxins	The Regional Pest Management Plan sets outcomes for pest management in the region but does not specify methods, therefore this submission theme is not applicable to the statutory plan. The council always seeks to use best practice methods which comply with all relevant legislation and minimise the use of toxins where possible.	Reject (not applicable)	Retain approach from proposed plan.
	Suggest Auckland Council collaboration	The council and the Department of Conservation have existing collaborative	Accept	Retain approach from proposed plan.

	with the Department of Conservation	relationships at all levels from operational field staff to senior managers, and will look to strengthen and extend these relationships over the lifetime of the plan.		
Kawau Island	Suggest working with Kawau community	Staff acknowledge that working with the Kawau community will be pivotal to this programmes success. Operational delivery of the programme will therefore include in-depth community engagement.	Accept	Retain approach from proposed plan.
	Do not support inclusion of wallabies (variety of reasons such as animal welfare, heritage value on Kawau) Note that more than twice the number of submitters supported wallaby control.	Staff acknowledge that some people value wallabies on Kawau for their historic and cultural significance. The cost benefit analyses accompanying the proposed plan concluded that the benefits that can be expected from the proposed approach outweigh the loss of these values. The council always seeks to use best practice methods which comply with all relevant legislation and are as humane as possible.	Reject	Retain approach from proposed plan.
	Do not support use of toxins	The Regional Pest Management Plan sets outcomes for pest management in the region but does not specify methods, therefore this submission theme is not applicable to the statutory plan. The council always seeks to use best practice methods which comply with all relevant legislation and minimise the use of toxins where possible.	Reject (not applicable)	Retain approach from proposed plan.
Waiheke	Suggest working with Waiheke community	Staff acknowledge that working with the Waiheke community will be pivotal to the success of this programme. The proposed plan seeks to support the community-led initiative Te Korowai o Waiheke.	Accept	Retain approach from proposed plan.

	Do not support the use of toxins	The Regional Pest Management Plan sets outcomes for pest management in the region but does not specify methods, therefore this submission theme is not applicable to the statutory plan. The council always seeks to use best practice methods which comply with all relevant legislation and minimise the use of toxins where possible.	Reject (not applicable)	Retain approach from proposed plan.
	Concerns that mammal eradication may not be feasible on this inhabited island. Note that over four times as many submitters supported the multi-species eradication approach.	Staff acknowledge there will be substantial challenges associated with achieving rat and stoat eradications from Waiheke. However, Aotearoa New Zealand is a world leader in eradications. Many of our past eradications were thought unachievable at the time. Reinvasion can also be successfully managed, as demonstrated by Rangitoto and Motutapu islands which receive over 100,000 visitors per year yet remain mammal free.	Reject	Retain approach from proposed plan.
Rural possums	Do not support use of toxins	The Regional Pest Management Plan sets outcomes for pest management in the region but does not specify methods, therefore this submission theme is not applicable to the statutory plan. The council always seeks to use best practice methods which comply with all relevant legislation and minimise the use of toxins where possible.	Reject (not applicable)	Retain approach from proposed plan
	Suggest working with landowners and community groups	Operational planning will consider where outcomes might be achieved through resourcing of community possum control activity. Contracted works may be more suitable for this programme in many instances due to contractors typically being able to suppress possums to lower levels, over larger	Accept in part	Retain approach from proposed plan

		areas than is usually practical for community activity. The natural environment targeted rate will also provide for enhanced facilitation of community conservation groups through Pest Free Auckland, which can complement contracted works.		
	Suggest urban management	Although the proposed landscape-scale possum control applies only to rural areas, the council may also undertake possum control in high ecological value parks or strategic peninsulas within urban areas. The council also facilitates community-led possum control through Pest Free Auckland. Staff acknowledge this is not well reflected in the formatting of the proposed plan.	Accept in part	Amend progressive containment programme to entire mainland.
Freshwater pests	Suggest freshwater management should focus on management of sediment and other pollutants	Management of freshwater pollutants falls outside the scope of the Regional Pest Management Plan.	Reject	Retain approach from proposed plan
	Suggest additional sites for management	The budget determined through the natural environment targeted rate does not provide for an increase in control beyond that provided for in the proposed plan. Community activity at other freshwater sites will instead be supported primarily through the Pest Free Auckland initiative. Site selection was based on a combination of ecological priority, existing community activity and ability to manage other pressures at the site, such as nutrient enrichment.	Reject	Retain approach from proposed plan

	Suggest new species	For species that were not included in the proposed plan, it is not possible for the council to include new pests in the final plan at this stage (see below in 'other' section' for further explanation). Some species were included in the proposed plan at a regional level but not in the site-led programme due to their current absence from those sites. In some cases it may be useful to add species to the site-led programme, even if they are not currently at those sites, to support potential future management in case of incursions.	Accept in part	Consider additional species for inclusion in site-led programme.
Other	Disagree with inclusion of cats as a pest (variety of reasons including animal welfare, concern over implications for companion animals).	Many submitters expressed concerns regarding risks to pet cats. In many instances these are perceived rather than actual risks, with submitters assuming much more extensive cat control than is likely in practice. In addition, the council always seeks to use best practice methods which comply with all relevant legislation and guidance provided by the SPCA, Ministry of Primary Industries and the National Animal Welfare Advisory Committee. While staff consider the approach set out in the proposed plan remains sound, staff are exploring options for mitigating these concerns in the wording of the final plan.	Accept in part	Staff are not recommending any changes to the current proposed methods. Staff are considering changes to how these controls are described, in particular: <ul style="list-style-type: none"> the possibility to refer to unowned cats rather than pest cats; ways in which the spatial extent of the proposed approach can be clarified.
	Suggest add new pest (included myrtle rust, marine pests, additional pest plants and animals)	It is not open to the council to insert a new pest in the final plan now. This is due to Biosecurity Act process requirements as well as general principles of consultation. Following adoption of the operative plan it is	Reject	Retain approach from proposed plan

		open to the council to add new species during the lifetime of the plan through a partial plan review under section 100D of the Biosecurity Act.		
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Additional substantive changes to plan

Table 2 below highlights other substantive changes that may be required to the Proposed Regional Pest Management Plan to fit within the available budget provided by the Natural Environment Targeted Rate, or in response to submissions (these points are not covered above as they did not receive a large amount of public feedback). Less significant changes may be required as staff work through submissions.

Table 2: Additional substantive changes

Key programmes	Submitter suggestions	Proposed staff response	Staff recommendation	Recommended amendments to the proposed plan
Pests on parks	Suggest additional species for parks programme	Some of the suggested parks may have merit for inclusion in the plan to ensure parks are comprehensively protected from pest plant impacts. Further work is required to review suggestions and to recommend possible additions. It is not open to the council to add new species which were not included in the proposed plan, but in some instances it may be possible to add species to the site-led programme.	Accept in part	New species may be added to parks site-led programme, subject to further consideration.
	Amend buffer boundaries to incorporate small pockets of land that are encircled by buffer but do not fall	Staff acknowledge, for simplicity of understanding by affected communities as well as operational completeness, that it is preferable to avoid situations where small areas of land are excluded from encircling buffers, such as Huia and Piha.	Accept	Consider amending mapped areas of buffers to remove these situations. May require re-wording of rule construction.

	within 500m of any surrounding park			
Pest spread to Hauraki Gulf Islands	Suggest moth plant be eradicated from the Hauraki Gulf	The budget determined through the natural environment targeted rate does not provide sufficient funding for enforcement of the proposed Hauraki Gulf landowner rule for moth plant. This species will therefore be managed through a non-regulatory approach on islands. Exceptions to this are the retention of eradication programme on Aotea Great Barrier, and sites which fall within buffer areas around priority parkland.	Reject	Remove Hauraki Gulf good neighbour rule for moth plant. Retain moth plant eradication programme for Aotea Great Barrier.
	Suggest stricter rules to prevent pest spread to islands	Staff are currently exploring in more detail the issues raised and the possible options for strengthening pathway management, while also complying with relevant legislations and principles of consultation.	Accept in part	Staff are exploring options to mitigate submitter concerns
Other	Query whether the proposed Good Neighbour Rule for rabbits is fair	Staff consider practical implementation of the proposed rabbit good neighbour rule may be challenging due to issues of fairness and subjectivity.	Accept	Remove proposed rabbit good neighbour rule from final plan and manage rabbits through available biocontrol agents and advice provision