

Council decisions on submissions to Proposed Amendments to the Regional Pest Management Plan

At its 27 March 2025 meeting, Council considered staff recommendations on submissions to the Proposed Amendments to the Regional Pest Management Plan and adopted them in full.

This Council decisions report sets out each submission point and whether that submission point is accepted, accepted in part or rejected (with reasons and comment). No further comment is provided in Council decisions for general support submissions.

At its 10 December 2024 meeting, Council approved that submission points raised outside the scope of the partial review were not to be considered as part of this plan review. For some of these submission points additional comment has been provided.

This report is structured to discuss each proposed change separately. Most submitters commented on more than one issue, so submission points are split into the appropriate sections.

Decisions Summary:

Below is a brief description of proposed amendments for each subject, a summary of what we heard through submissions and a staff recommendation.

Wallabies

It was proposed that all wallaby known to be in NZ are included in the RPMP.

- Notable support to include additional wallaby species
- Request that wallaby species not known to be in the region included in the exclusion pest programme rather than proposed progressive containment/eradication programmes
- Two submitters opposed wallaby management in our region
- Sufficient funding needs to be put towards wallaby management
- Assurance that any wallaby management/disposal is humane.

Council decision: Parma wallabies already confirmed in the region be included as a progressive containment pest along with Dama wallaby. Bennett's, Brush-tailed and Swamp Wallabies to be included as exclusion pests as they are not in the region.

Conifer species

It was proposed that all wilding conifer species in the progressive containment species are included as pests in any form (planted or wild)

- Notable support for progressive containment conifer species being included as a pest in any form (planted or wilding)
- Implementation issues raised.

Council decision: All progressive containment conifer species (Lodgepole or contorta pine, Scots pine, Dwarf mountain pine, Mountain pine and European larch) to be included as pests in any form (planted or wild). These conifers will be collectively referred to as 'pest conifers'.

Exotic Caulerpa

It was proposed that exotic *caulerpa* be included as an exclusion pest in the RPMP. An additional rule was proposed to strengthen the rules that manage marine pests.

- Absolute support for including exotic *caulerpa* in the RPMP
- Sufficient resourcing required
- Suggested amendments to rules that manage marine pests.

Council decision: Exotic caulerpa to be included as an exclusion pest in the RPMP. Proposed Rule 7A to be included as a measure to avoid the spread of marine pests.

Corbicula

It was proposed that *corbicula* be included as an exclusion pest in the RPMP. Amendments were proposed to the rules that manage the spread of freshwater pests.

- Absolute support for including corbicula in the RPMP
- Implementation and resourcing issues raised
- Suggested amendments to rules that manage freshwater pests.

Council decision: Corbicula to be included as an exclusion pest in the RPMP. Proposed amendments to Rule 7 be included to require vessels and craft are cleaned, checked and dried and ensure recreational equipment is free of freshwater pests.

Introduced Turtles

It was proposed that introduced turtles be included as a sustained control pest in the RPMP. A blanket exemption would be required for responsible turtle owners. Otherwise the generic rules in the RPMP would prevent people keeping turtles as pets.

- A mix of full support and strong opposition
- Some submitters asked for introduced turtles to be included in the eradication programme rather than sustained control

- Some submitters want RPMP rules to ban sale/breeding and movement of turtles
- Requests for assurance that any turtle management/disposal is humane and for further detail on how exemptions for responsible turtle owners would be implemented
- Some submitters didn't believe turtles cause adverse environment effects and therefore did not think they need to be managed
- Some submitters do not want turtles included in RPMP as there is other legislation to manage them (eg the Wildlife Act already bans release of animals).

Council decision: Turtles to be included as a sustained control pest and measures included to advocate for responsible turtle ownership.

Wallaby

Proposal: It was proposed all wallaby known to be in NZ are included in the RPMP.

- **Prudence A Burt**– Individual

All wallaby species present in NZ should be included in the plan

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Prue Burt**–Te Whakakaha Trust

All wallaby species present in New Zealand should be included in the plan

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Earl Rewi**– Te Runanga o Ngati Whare

Strongly agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**– Individual

I support this proposal. Push for eradication rather than maintain/control.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	While eventual eradication of wallabies is the current aspirational goal of the national wallaby programme, their eradication is not achievable in the duration of this RPMP and so they can't be included in the eradication program.

- **Chris Mitchell**– Individual

I think we should prioritise RPMP spending. While Wallabies are a nuisance they could be classed as game same as Pukekos and gifted to Fish and Game. We should be spending money on things that are not here yet. For example we should have a beehive exclusion zone of 10km around all air and sea ports, international and domestic. We should put our money into sentinel beehives to attract incoming pests. We should be guarding the country of pests such as small hive beetle and European Foul Brood. There will be lots of other examples from various industries. Leaving no money for Wallabies. It is a system failure that Wallabies are present, but we need

to move on. It is important there are no more system failures. You have no hope of removing Wallabies in my opinion. But there is a long list of things that are not here where the current efforts being taken is very poor. The MPI apiculture surveillance program is simply not fit for purpose and something should be done.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Submitter questions inclusion of all wallabies so Council assumes submitter does not agree with additional wallaby species being added. Council has undertaken comprehensive cost benefit assessments to support its approach to wallaby management. Additional species submitter would like included are outside the scope of this partial review but can be considered to inform development of the next RPMP.

- **Andy Blick**– Individual

To save both our times I will simply say: I do NOT agree with any part of your wallaby plan.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Council has undertaken comprehensive cost benefit assessments to support its approach to wallaby management.

- **Soweeta Fort-D'Ath**– Individual

Needs to include all Wallaby species.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Patrick Aranga Clark**– Individual

RPMP needs to include all wallaby species and be resourced accordingly to activate iwi, hapū.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	While the national programme is resourcing some iwi initiatives, council currently does not have funding available to further resource and activate iwi/hapū.

- **Beccy Ganley**– Individual

I support the change

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Arnja Dale**– RNZSPCA

SPCA acknowledges that dama wallabies are currently managed through eradication and progressive containment in the Bay of Plenty region due to their impact on industry and biodiversity.

SPCA recognises the impacts of wallabies in New Zealand (Latham et al., 2016, 2019) and is not opposed to managing the different wallaby species to protect biodiversity. However, based on the documents available for the consultation, it is not clear why the Bay of Plenty Regional Council has decided to include other species of wallabies in the Regional Pest Management Plan. There is sparse information in the consultation documents indicating a need for inclusion in the Regional Pest Management Plan.

SPCA advocates for the use of ethical principles in decision-making to determine if pest management is justified before conducting activities that may negatively impact the welfare of target and non-target animals.

SPCA advocates instead that any person engaging in pest management use an ethical framework to decide action towards animal population control. Using both an ethical and evidence-based approach. Dubois et al. (2017) created a framework for making decisions about animal population control based on the following questions:

- Can the problem be mitigated by changing human behaviour?
- Are the harms serious enough to warrant wildlife control?
- Is the desired outcome clear and achievable, and will it be monitored?
- Does the proposed method carry the least animal welfare cost and to the fewest animals?

- Have community values been considered alongside scientific, technical, and practical information?
- Is the control action part of a systematic, long-term management program?
- Are the decisions warranted by the specifics of the situation rather than negative labels applied to the animals?

The Dubois et al. (2017) framework factors human behaviour, attitudes, and values, animal welfare, and rigorous planning, monitoring, and evaluation into decisions about pest management.

SPCA advocates that management activities should only use methods of population control that minimise negative impacts on any animal, are target-specific, and have clear, achievable objectives that are monitored.

SPCA acknowledges that it is sometimes necessary to manage populations of species for a variety of reasons, including protecting biodiversity. Animal population control should only be conducted as part of an integrated animal management programme, and lethal methods should only be used where there is no effective non-lethal, humane alternative available. At all times, care must be taken to minimise the adverse effects of these activities on the welfare of both target and non-target animals.

SPCA opposes the use of methods of population control or management of wild animals that lead to prolonged death and suffering of target or non-target animals.

SPCA opposes the use of poisons to manage wallabies due to the time it takes a poisoned wallaby to become insensible before death and the physical and mental harm experienced during this time.

Ground and aerial baiting with 1080 is used to manage populations of wallabies in New Zealand (Eason et al., 2017). Little is known about the impact of 1080 on wallabies (Beausoleil et al., 2010). The use of 1080 to target wallabies is concerning because of the potential it has for prolonged death in herbivores, including wallabies (Beausoleil et al., 2010; Eason et al., 2010). Earlier studies indicate Bennett's wallabies experience sickness behaviour and prolonged time to death from 1080 poisoning (i.e., 13.8-38.9 hours; McIlroy, 1982; 12-24 hours, Elgie, 1961).

SPCA advocates for research and development of humane alternatives for animal population control, including replacing lethal methods with effective non-lethal methods that minimise negative impacts on animal welfare, such as limiting reproductive abilities.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Wallaby management in our region is guided by Tipu Matoro National Wallaby Eradication Programme. Best practice guidance ensures control operations are as effective as possible and that the legislative requirements for

	health and safety, toxin use, and animal welfare are met.
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- **Chantel Pagel**– Royal Forest and Bird Protection Society of New Zealand Inc
Forest & Bird support the inclusion of all wallaby species found in the BoP region.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Eben Herbet**– Eastern Region Fish and Game Council
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Hayley Bennett**– Rotorua Branch of Forest and Bird
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **John Sanson**– Biosecurity New Zealand
We support the proposed inclusion of all wallaby species in the plan.
Note, Bennett’s wallaby is incorrectly spelt in the table, it should have two Ts.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Spelling correction made.

- **Jesse Brennan**– Federated Farmers
The proposal to add the Bennet’s Wallaby, Brush-tailed Rock Wallaby, the Parma Wallaby, and the Swamp Wallaby, as well as retaining the existing Dama Wallaby, to the Pest Management Plan is supported.

Federated Farmers understands that only the Dama and Parma species are currently present in the Bay of Plenty, the Bennet’s wallaby being found in the South Island. We note that the Waikato Regional Pest Management Plan includes all five wallaby species, with exclusion status for Bennett’s Wallaby, Brush-Tailed Wallaby, Parma Wallaby and Swamp Wallaby, and progressive containment for the Dama Wallaby.

Including all wallaby species in the Pest Management Plan means that if there are any incursions of new species, the Council will be able to act promptly, for example if the Bennet's wallaby reaches the North Island.

Eradication and progressive containment status is consistent with the Biosecurity Act 1993, with Wallabies classified as an unwanted organism under sections 52 and 53 of the Act. Federated Farmers asks why exclusion status has not been provided for the species Bennett's Wallaby, Brush-Tailed Wallaby and Swamp Wallaby, similar to Waikato Regional Council's status.

Federated Farmers in 2022 reminded members to be vigilant about wallabies. Federated Farmers considers it would be much easier to spend the resources to contain them in their current range than to spread control costs across landowners over a far larger area. The situation with the continually spreading wallaby population in the South Island shows the risks when control is reduced.

1. Federated Farmers supports the inclusion of the Bennet's Wallaby, Brush-tailed Rock Wallaby, the Parma Wallaby, the Swamp Wallaby, and the Dama Wallaby into the Pest Management Plan.
2. Federated Farmers supports overall eradication status of all wallabies, with progressive containment being a method to achieve this.
3. Federated Farmers suggests that exclusion status is used for the Bennett's Wallaby, Brush-Tailed Wallaby and Swamp Wallaby.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Bennett's, Brush-tailed and Swamp Wallabies should be included as exclusion pests for reasons raised in submissions.

- **Alistair Fairweather**– Waikato Regional Council
We support the inclusion of Parma wallabies under the eradication/sustained control programme

However, we have significant concerns about placing Bennett's, Swamp and Brush-tailed wallabies under the eradication/progressive containment programmes. We believe that these species should sit under the exclusion pest programme. Our reasoning is as follows:

- There is no indication that these species have established within the BOP region based on observational data and genetic testing.
- The only way for these species to establish in the region would be via human assisted introductions. Making them exclusion pests sends a stronger message to the public that they are 'unwanted' in the BOP region.
- If they were illegally released inside the containment area, the Bay of Plenty Regional Council will only be required to progressively contain

them. This will potentially allow for them to become established in the region and result in a greater complexity when trying to eventually eradicate all wallaby species from the central North Island.

- Including these species within the exclusion programme will align with the Waikato RPMP 2022-2032.

Seeking the following relief;

Include Bennett's, Brush-tailed, and Swamp wallabies in the exclusion pest programme, rather than the eradication/progressive containment programmes.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Bennett's, Brush-tailed and Swamp Wallabies should be included as exclusion pests for reasons raised in submissions.

- **Liesel Carnie**– WBOPDC

We support the inclusion of all wallaby species to be included as progressive containment/exclusion as we acknowledge that this programme is substantial and critical to our district.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Bennett's, Brush-tailed and Swamp Wallabies should be included as exclusion pests for reasons raised in submissions.

New Exclusion Pests (Exotic *Caulerpa* and *Corbicula*)

Proposal: It was proposed that exotic *caulerpa* and *corbicula* be included as exclusion pests in the RPMP.

- **Earl Rewi**–Te Runanga o Ngati Whare
Strongly Agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**– Individual
Good. Treat all new pests the same.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Soweeta Fort-D'Ath**–Individual
Yes must these pests must be included as soon as possible

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Beccy Ganley**– Individual
I very strongly support the change

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Patrick Aranga Clark**–Individual
RPMP needs to include *Caulerpa* and all species to *Corbicula* and iwi need to be resourced to carry out ongoing freshwater surveillance.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Council currently works with Iwi entities (For example, TALT, Manaaki Te Awanui) to deliver freshwater and marine pest programmes.

Specific to Caulerpa

- **Sam McGowan** Individual

I strongly agree on this. As a BSc major in Aquaculture, I have a deep passion for not only the aquaculture industry and it's future economic targets and potential, but aquatic ecosystems and biodiversity as a whole. The threat of caulerpa is very real, and sudden and drastic measures are vital to ensure this species does not establish itself not only in the BOP region, but all across Aotearoa.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Chantel Pagel**– Royal Forest and Bird Protection Society of New Zealand Inc

Exotic caulerpa is present in several locations from the Hauraki Gulf to the Far North. Caulerpa poses an existential threat to the already significantly degraded ecosystems. Its arrival would see devastating impacts on the Bay of Plenty which is why exclusion is our best line of defense.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Eben Herbet**– Eastern Region Fish and Game Council Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Hayley Bennett**– Rotorua Branch of Forest and Bird Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **John Sanson**– Biosecurity New Zealand
We support the addition of Caulerpa to the plan.

<i>Council decision</i>	<i>Reason</i>
Accept	

- **Liesel Carnie**– WBOPDC

Caulerpa

1. We support the option to include the species as an exclusion pest.
2. We oppose the second option to include the pest as sustained control should an incursion occur. We recommend the pest to be included as a progressive containment pest if an incursion should occur. The research suggests 90% eradication would be possible and therefore until eradication is possible, progressive containment should be utilised. With our harbour and ocean being of significance to residents, many industries and Iwi and Hapu, we think it is important that this pest should be classified as a pest for progressive containment. There are already substantial pressures on the harbour due to sediment and increased minerals and therefore, many species that Caulerpa will have a profound affect on, are already struggling.

Relief Sought:

Amend to increase the second option to progressive containment

Clarification required.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	The Caulepra Technical Advisory Group (TAG) have advised that eradication (full and permanent removal) of this pest is highly unlikely. While recognising strong community desires to eradicate exotic caulerpa, the TAG group reports that this is not currently a realistic objective. Progressive containment of caulerpa would not be feasible to prevent the pest from spreading to other parts of the region given its biology and ability to spread and grow quickly.

Specific to Corbicula

- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand

Inc

Forest & Bird support the continuous surveillance of gold clam.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Eben Herbet**–Eastern Region Fish and Game Council
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Hayley Bennett**–Rotorua Branch of Forest and Bird
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Michelle Phillips**–Ngati Tahu-Ngati Whaoa Runanga Trust
Corbicula fluminea have been found in many places in the lower Waikato River and in the Taupo Aqua Park. Management of these infestations has been slow on central government’s behalf so the Runanga appreciates that BOPRC are amending their RPMP to include this invasive pest.

The Runanga supports option 2 in the discussion document, Exclusion and Sustained Control, as we consider it a matter of “when” not “if” these pests arrive in the upper Waikato River and BOP region.

Should this invasive pest become established and allowed to spread throughout the BOP region, there will be significant damage to the mauri of the affected waterways. Without a robust surveillance plan in place, eradication will be very expensive and highly unlikely.

The Runanga recognises that the biggest risk to lakes in the BOP region is boat users coming from the Waikato River onto the lakes without cleaning their boat and equipment. For this reason, the Runanga would appreciate BOPRC considering setting up a wash station at Lakes Okaro and/or Rerewhakaaitu as these are the most common southernmost lakes used by those recreational boat users in the area that do not live in Rotorua City (therefore are unlikely to use the facilities available in the city).

The Runanga also recognises the success of the collaboration between BOPRC, WRC, iwi and other stakeholders with regards to managing wallabies. This approach is also favoured by the Runanga for the management of corbicula species and we would be happy to participate in such a group, should it be set up.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Implementation issues raised are not part of the RPMP review.
	Council has investigated the establishment of

	washdown facilities at various strategic locations around the Rotorua Lakes District. Current investigations indicate that implementing and maintaining is cost prohibitive*, particularly under Council's current efforts to reduce organisational spending. Until such permanent facilities become cost effective, council will continue to educate boat users visiting the lakes about the importance of washing vessels before they arrive. *Costs include building facility and supporting infrastructure, compliance, land for appropriate site and ongoing maintenance.
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- **John Sanson**–Biosecurity New Zealand

We support the inclusion of corbicula as an exclusion pest. It aligns with current national corbicula response efforts and long-term management ambitions, particularly supporting attempts to 'contain' corbicula to the Waikato.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Alistair Fairweather**–Waikato Regional Council

We note that Rule 7 is being applied to the proposed new pest animals Corbicula spp. and introduced turtle species (see the proposed explanation section for these rules). However, Corbicula is a mollusc and turtles are reptiles, therefore Rule 7 as it stands does not apply to them.

Request the following relief:

Amend the wording throughout Rule 7 from 'freshwater fish species and freshwater plant pests' to 'freshwater aquatic pests' to capture the wider group of proposed pests.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Agree to amend 'freshwater fish species and freshwater plant pests' to 'freshwater pests'.

- **Liesel Carnie**–WBOPDC
Corbicula

1. We support the proposal to increase surveillance in water ways.
2. As a Council managing water infrastructure, we will be moving large amounts of equipment between freshwater bodies, including potentially from the Waikato. We would request appropriate guidelines for staff and contractors in addition to guidelines for recreational users.
3. We would like to be informed if there is evidence to suggest that the clams, particularly in their juvenile state, survive in wastewater? For example, when residents are cleaning their equipment at home, and it is flushed into our wastewater treatment plants, will it survive and reproduce? Is so, are there any guidelines or advice that can be followed to mitigate against this risk?

Relief Sought:

Amend to increase the second option to progressive containment

Clarification required.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Any water infrastructure used in the Waikato River is subject to Sections 52 and 53 of the Biosecurity Act 1993, which prohibit a person from knowingly communicating pests or unwanted organisms. Additionally, these sections restrict the movement of any craft, goods, or other risk items that the owner or person in charge knows or suspects to contain a pest or unwanted organism. The risks associated with moving Council water infrastructure within the region needs to be considered on a case-by-case basis. In this case, we advise contacting the Regional Council Biosecurity Team to get advice on managing biosecurity risks. While no specific research confirms corbicula can survive in wastewater systems, our recommendation is to follow the cleaning methodology prescribed by MPI (<u>Exotic freshwater clams (Corbicula) - check clean dry</u>).

Marine Feedback

Proposal: An additional rule was proposed to strengthen the rules that manage marine pests.

- **Sam McGowan** Individual

Full support. Must do what is necessary for the protection of the emerging growth of the aquaculture industry and protect native ecosystems.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Earl Rewi**-Te Runanga o Ngati Whare

Strongly Agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**-Individual

I have no problem with this.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Soweeta Fort-D'Ath**-Individual

Yes agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Patrick Aranga Clark**-Individual

This is a must but also must have the resource to monitor and enforce compliance.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Pests can only be included in plan if there is

	sufficient resourcing to manage. Council will need to consider this through their decision making.
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- **Beccy Ganley**–Individual
I support the change

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc
We support the approach to require water users to do their bit to ensure their equipment is free from residue. This is already implemented at our borders when hiking or snorkelling gear is brought into New Zealand.

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Eben Herbet**–Eastern Region Fish and Game Council
Support

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Hayley Bennett**–Rotorua Branch of Forest and Bird
Support

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **John Sanson**–Biosecurity New Zealand
We support the new marine pest rules which will help to manage the spread of marine pests by requiring all craft moving to or within our waters to have clean hulls and high-risk areas (including anchor, chain, anchor wells and live bait tanks) and boating equipment to be free of pests and sediment.
 - You may want to consider some sort of declaration process for vessels that are high risk or known to be non-compliant with the new rule.

- Recommend Rule 7A read “the occupier in charge of a craft moving into or within Bay of Plenty waters”
- Recommend that Rule 7A (2) specify “All high-risk areas on the craft are free of marine pests
- Recommend that rule 7A be amended to specify coverage of barnacles, for example 1-5% to be consistent with other regulations.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	• Amend Rule 7A to read “the occupier in charge of a craft moving into or within Bay of Plenty waters” • Amend Rule 7A (2) to specify “All high-risk areas on the craft are free of marine pests Instead of referring to coverage of barnacles, the rules refer to alignment with MPI Craft Risk Management Standard for biofouling. This approach allows changes in regulation requirements. A declaration process will be built within the Marine Vessel Portal (MVP). This database will capture information on completed inspections. In the future, there will be public access to cleanliness records of vessels. A traffic light system within the MVP is being developed to notify councils of unclean boats.

- **Alistair Fairweather**–Waikato Regional Council
Rule 8 within the BOP RPMP, which requires all persons to notify the council once they have received products contaminated by pests, only applies to marine pests. We believe that Rule 8 should be expanded to freshwater pests (and potentially all exclusion/eradication/progressive containment pest plants that can be spread via contaminated material).

An example of why we consider the rule should be widened is: alligator weed was introduced to the BOP region through contaminated kumara plants brought down from Northland. A requirement to report would have allowed the council to potentially eradicate alligator weed from the region before it became a significant problem.

Relief Sought:

Expand Rule 8 to include freshwater pests (and potentially all exclusion/eradication/progressive containment pest plants that can be spread via contaminated material), or add a new rule to this effect.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Agree. Expand Rule 8 to include freshwater and exclusion pests. This aligns with Council's strategic direction to have greater surveillance and lead eradication of new to region pests.

- **Liesel Carnie**–WBOPDC

1. We support the use of this rule.
2. We would suggest it has clearer and similar wording to the freshwater rule 7.3 “that all occupiers to vessels or craft entering any water body within the Bay of Plenty shall Check, Clean and Dry their vessels or craft (including trailers) to ensure they are free from Marine pests”. Behaviour change science suggests similar and clear messaging with precise instructions provides better outcomes. Therefore, we suggest aligning rule 7 and 7A, especially as for Caulerpa, it is suggested drying equipment is critical to reducing the spread.

Relief Sought:

Amend to provide alignment to Rule 7

<i>Council decision:</i>	<i>Reason:</i>
Accept	Agree. Include reference in both rules 7 and 7A to good practice guidelines on MPI website

Freshwater Feedback

Proposal: Amendments were proposed to the rules that manage the spread of freshwater pests.

- **Sam McGowan** Individual
Fully support. Must do what is necessary for the protection of native ecosystems.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Earl Rewi**-Te Runanga o Ngati Whare
Strongly Agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**-Individual
This is good.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Soweeta Fort-D'Ath**-Individual
Yes agree needs resourcing to monitor and enforce compliance

<i>Council decision:</i>	<i>Reason:</i>
Accept	Pests can only be included in plan if there is sufficient resourcing to manage them. Council has considered this through its decision making.

- **Patrick Aranga Clark**-Individual
This is a must but must also have the resource to monitor and enforce compliance and iwi must lead this programme.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Pests can only be included in plan if there is sufficient resourcing to manage them. Council

	has considered this through its decision making.
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- **Beccy Ganley**–Individual
I support the change

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc

We support the approach to require water users to do their bit to ensure their equipment is free from residue. This is already implemented at our borders when hiking or snorkelling gear is brought into New Zealand.

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Eben Herbet**–Eastern Region Fish and Game Council

It is proposed that Rule 7(3) be amended to require all occupiers of vessels or craft to check, clean and dry their vessels before entering any water body.

For the purposes of this plan, the term check, clean and dry is a slogan to support education and behavioural changes (Regional Pest Management Plan for the Bay of Plenty Region 2020-2030, Appendix 3)

While Fish and Game supports this message, the term is far too vague and uncertain to be of use in a rule.

The term is an and/or requirement, meaning check and clean and dry. If a user checks and no pests are present, the rule would still require them to clean and dry their vessel for no good reason. The term clean is undefined in the plan, and in fact the best method of cleaning will vary depending on the pest species present, ranging from physical removal to soaking in a chemical solutions or hot water to drying out for a period of time. While it is accepted that drying a vessel, craft or trailer between uses is a helpful method to prevent the spread of pests, the rule suggests that in order to comply they would have to be dry before entering a water body. This would unreasonably prevent vessels moving from one water body to another, or even those relaunching into the same water body on the same day. It would even prohibit the launching of those vessels that have merely gotten wet from rain enroute to a water body, or have arrived via a wash station as currently legally required for Lake Okataina under MPI's *Corbicula fluminea* Controlled Area Notice.

Fish and Game supports a rule which requires users to check over their vessels, craft and trailers and ensure they are free from freshwater pests before launching. However, the amended wording fails to achieve this in a sensible way. It is submitted that the original wording of Rule 7(3) was preferable in this regard.

It is noted that the proposed Explanation for Rule 7 states the Rule 7(3) only intends to capture introduced turtles that have escaped or been deliberately released. However, Rule 7(3) seems to relate exclusively to freshwater pest fish and freshwater pest plants with no reference to turtles. I suspect there has been an error in the cross reference.

Relief Sought

Amend Rule 7(3) by deleting the reference to “check, clean and dry” and replace it with wording which achieves the same purpose, but is clear, certain, defined and enforceable.

Check reference to turtles in explanation for Rule 7.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Council rejects proposal to remove the “Check, Clean, and Dry” requirement from this rule. While checking a vessel is effective for identifying visible pest material, it may not detect microscopic pests, such as juvenile Corbicula larvae. Going through the entire process will ensure better vessel hygiene. Reference to Rule 7(3) in explanation is a typo. It should read Rule 6(3).

- **Hayley Bennett**–Rotorua Branch of Forest and Bird Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **John Sanson**–Biosecurity New Zealand
 - We support the addition of corbicula to these plans, given there is a risk that they will become established in the region in the future.
 - We do have reservations about the wording of rule 7 where it states “freshwater fish pests and freshwater plant pests”. The measures in place will also limit the spread of corbicula; however, it is not

explicitly covered. Consider changing the wording to just “freshwater pests”, which would also be consistent with rule 7A

- We support the inclusion of check, clean, dry language. We support the alignment with the pathway management approach and the alignment with the national Check, Clean, Dry behaviour change programme.
- A further example of alignment is the Waikato River CAN for corbicula. Waikato River Controlled Area Notice (mpi.govt.nz)
- Inclusion of 7.5 ‘equipment’ is also in alignment with the two CAN notices currently in place, however we recommend the addition of waders to the list of recreational equipment that should be freshwater pest free.

<i>Council decision:</i>	<i>Reason:</i>
Accept	• Change reference to freshwater pests • Include reference to MPI good practice • Add waders to recreational equipment Agree with points raised in submission.

- **Liesel Carnie**–WBOPDC

We support these changes, see notes for rule 7A which were detailed as follows –

1. We support the use of this rule.
2. We would suggest it has clearer and similar wording to the freshwater rule 7.3 “that all occupiers to vessels or craft entering any water body within the Bay of Plenty shall Check, Clean and Dry their vessels or craft (including trailers) to ensure they are free from Marine pests”. Behaviour change science suggests similar and clear messaging with precise instructions provides better outcomes. Therefore, we suggest aligning rule 7 and 7A, especially as for Caulerpa, it is suggested drying equipment is critical to reducing the spread.

Relief Sought:

Amend to provide alignment to Rule 7

<i>Council decision:</i>	<i>Reason:</i>
Accept	Agree. Include reference in both rules 7 and 7A to good practice guidelines on MPI website.

Turtles Feedback

Proposal: It was proposed that introduced turtles be included as a sustained control pest in the RPMP. A blanket exemption would be required for responsible turtle owners. Otherwise the generic rules in the RPMP would prevent people keeping turtles as pets.

- **Sam McGowan** Individual

Red ear turtles and subspecies - fully support inclusion in the RPMP.

Other introduced species - fully against inclusion in the RPMP. It is evident that not enough research has been done by the BOPRC. While I fully support the capture, destruction, and ban on breeding of Red ear turtles, an extension of this to all introduced species of turtle is unrealistic, unneeded, and a drain on already stretched resources of the BOPRC. Put simply, other turtles mentioned and implied in the proposed changes, particularly emydura subglobosa, cannot survive in temperatures much into the mid-low twenties, and have been proven to be unable to breed below water temps below 28c. "An exemption for currently owned turtles will be granted under the Biosecurity Act with conditions to ensure turtles can not establish in the wild." - How will this exemption work. Will turtle breeding be banned? Will ownership require registration, at a cost to owners? Will turtles be illegal to transport into the region? How will non-compliance be monitored and enforced?

A ban, or heavy restriction on turtles will support a black market industry, with no open resources, support, or education for these species. This is exactly what was seen with the law changes on ferret ownership some years ago. In short, a ban will further exacerbate the issues of releasing unwanted pets.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Whilst there is a degree of uncertainty regarding turtles' ability to survive in the wild in NZ, Bay of Plenty has warmer geothermal soils that may enable turtle survival. Climate change is another factor BOPRC is trying to anticipate. Using other pests as an example, the benefit of hindsight tells us more action should have been taken to prevent some pest populations. There is no proposed ban on turtle breeding, sale, transportation or requirements for turtles to be registered. The purpose of this proposal is to prevent release and accidental escapes.

	An exemption is required for pet turtle owners otherwise they would be captured by Rule 6(3). Council proposes a blanket exemption for all responsible turtle owners who provide secure housing for their turtles. Turtle owners would not need to apply for an exemption if they meet the exemption conditions. Responsible pet owners need to factor in future scenarios of pet ownership including bigger enclosures or longevity of a pet and current Wildlife Act requirements. Education and advocacy through this RPMP proposal can bring these issues to the forefront of people considering getting a pet turtle. This proposal will support current legislative requirements and also addresses accidental escapees.
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- **Clair Ellis**–Individual

I support the inclusion of Turtles- I consider Red Eared Slider Turtles a threat to native species in our waterways.

I hope that eventually selling turtles for pets & owning them will be banned in NZ because of the danger they pose to native species. Climate change will enable eggs to be viably hatched, there is plenty of research supporting this. Sightings in Papamoa creeks & Gordon Carmichael reserve are common because pet owners release them into the wild due to the turtles outgrowing indoor tanks.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Earl Rewi**–Te Runanga o Ngati Whare
Strongly Agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**–Individual
Good.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Soweeta Fort-D’Ath**–Individual
Yes agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Patrick Aranga Clark**–Individual
Yes need greater pressure on pet industry

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Beccy Ganley**–
I support the change

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Arnja Dale**–RNZSPCA
SPCA acknowledges that human activities have led to many problems associated with wild animals considered pests in New Zealand. Our organisation advocates that people should assess and modify their behaviour as a first step in comprehensive pest management. Given that red-eared sliders are established in the wild in New Zealand because of deliberate release or escape from the companion animal populations, we support greater control around the keeping of red-eared sliders to help prevent future anticipated problems with red-eared sliders establishing populations in the wild (see Kikillus et al., 2010) and to protect turtle welfare.

SPCA is concerned with the manner in which red-eared sliders may be killed in pest management operations. Turtles are difficult to humanely kill. A two-step euthanasia process is recommended because it is often difficult

to confirm that a reptile is dead (American Veterinary Medical Association [AVMA], 2020; Divers & Mader, 2005; Doneley et al., 2017; Mader & Divers, 2014). Once a turtle has been killed, death should always be confirmed with a physical intervention, such as decapitation or pithing. Inducing hypothermia is an unacceptable method of restraint or killing for turtles (AVMA, 2020)

SPCA is pleased to see the impact on rescue organisations and turtle welfare included in the cost-benefit analysis. These are often overlooked as negative outcomes of the environmental impacts of irresponsible pet ownership. SPCA does not frequently take stray red-eared sliders into our care, however, those that come in are typically in poor health. Stricter requirements on ownership of red-eared sliders, including requirements for appropriate housing and husbandry would likely decrease the abandonment of red-eared sliders.

On a side note, SPCA would like to point out that the cost-benefit analysis is incorrect indicating red-eared sliders are native to Asia. Red-eared sliders are native to areas in the United States and not native to Asian countries.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Correction made re turtles being native to US If disposal of red eared turtles through a pest management response is required, all best practice and Animal Welfare Act requirements will be complied with. BOPRC has received vet advice and acknowledges euthanasia is difficult and costly. Education and advocacy will play an important role in promoting responsible pet ownership.

- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc

While Forest & Bird fully support the inclusion of introduced freshwater turtles to the pest management plan, we suggest to aim for eradication and further, to implement a "buy back" option to prevent pet turtles to be released into the wild. Many pet owners are unprepared for the rapid growth young turtles display within their first year and therefore quickly run out of space. In addition, turtles are great escape artists and may find their way into the wild due to poorly secured enclosures.

We believe this option will be cheaper than ongoing control in the wild. We understand the biology of *Trachemys scripta elegans* makes eradication challenging, however, the application of a proactive eDNA testing programme and support for local caregroups could assist with the efforts.

<i>Council decision:</i> Accept in part	<i>Reason:</i> Progressive containment or eradication of turtles is currently not feasible. The financial resources required to implement and maintain such programs are currently too high, particularly considering the complexities and cost involved in capturing turtles and disposing of them in accordance with best practice (euthanasia via certified veterinarians). Additionally, many of the turtle species, aside from red-eared slider turtles, that have naturalised in New Zealand are protected under the provisions of the New Zealand Wildlife Act, which limits our ability to initiate widespread control or eradication efforts. The purpose of this proposal is to prevent the release and accidental escapes and fostering responsible pet ownership. Additionally, this approach focuses on understanding the specific challenges posed by the presence of turtles in the wild. Under the sustained control program, the council will continue to prioritise education and advocacy programs to encourage responsible turtle ownership. Council will not be conducting direct or proactive compliance efforts but will respond to complaints regarding poorly secured or unsuitable housing for turtles as necessary. If appropriate, Council can reconsider and reclassify the status of turtles under the RPMP during the next review of the document in 2027-28. Council are not currently in a financial position to enter into a buyback scheme, particularly under current efforts to reduce organisational spending.
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- **Eben Herbet**-Eastern Region Fish and Game Council Support

<i>Council decision:</i> Accept	<i>Reason:</i>
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- **Hayley Bennett**–Rotorua Branch of Forest and Bird Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Heather Wills**–Individual

I would like to see sales banned and any pet turtles monitored in some way so that when they are no longer wanted by their owners for any reason they can be handed over to the Regional Council for shipping to a zoo or very quietly euthanised.

As some turtles have already been released near Papamoa and apparently have even managed to lay eggs.....we can't be too soft or they will become a big problem like koi carp have in the Waikato.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Council is proposing an education/advocacy based approach at this stage that is not onerous on responsible pet owners. If there is evidence of turtle spread and breeding in the wild, further management options can be considered during the development of the next RPMP.

- **Kevin Evans**–

The justification for this change lacks sufficient detail, particularly concerning the breeding, sale, distribution, rehoming, and movement of turtles. While your plan notes that “there are no native turtles in New Zealand” and mentions the potential ecological risks posed by introduced species, it is important to clarify that many turtles currently kept as pets in New Zealand are tropical species that cannot survive in our climate. Species such as Painted Turtles (*Emydura subglobosa*) and Box Turtles (*Terrapene* spp.) are particularly vulnerable to respiratory infections due to suboptimal temperatures. Although they may survive for short periods in the wild, they cannot reproduce or establish sustainable populations.

While I understand the inclusion of Red-Eared Turtles in the national pest management programme due to their adaptability in other regions, the conditions in New Zealand do not support their reproduction or long-term survival in the wild. Studies, such as those cited by <https://www.inducingturtles.com/not-a-nz-pest/>, show that Red-Eared Sliders cannot reproduce without human assistance, as eggs require higher

temperatures and moisture levels than are typically found in New Zealand. Furthermore, adult turtles often die from starvation or disease after a few years in the wild. As such most other turtle species that are in New Zealand require 28 C as a minimum egg incubation temperature, so cannot expand their numbers, let alone become a uncontrolled pest species. I would also like to note that turtles would have very little environmental impact on any native wildlife, be it plant, fish or invertebrate compared to gambusia, trout or koi that are wildspread and uncontrolled.

Turtles have been kept as pets in New Zealand for decades, and responsible ownership practices have improved significantly. The reduction in commercial breeding of Red-Eared Turtles has led to fewer unwanted pets being released. Additionally, many reptile rescue centres across the country now help manage unwanted animals, further mitigating risks of release. Given that no new turtle species have been introduced to New Zealand in over 28 years, the perceived “pest problem” is minimal. As a dedicated breeder and reptile enthusiast, I prioritise responsible pet ownership and carefully vet potential owners to ensure they can provide suitable environments for their pets.

Your proposed plan lacks clarity on the exemptions for existing turtle owners. I would appreciate clearer information on the following points:

- How can current owners obtain exemptions?
- Are existing owners allowed to acquire additional turtles?
- What are the regulations for new pet owners?
- Can turtles be transferred between owners?
- Are breeding and transfer permitted for exempt owners?
- How will compliance be monitored?
- What are the consequences for non-compliance, and who will enforce these measures?
- What data and evidence do you have to justify banning ALL turtle species in NZ even when many are tropical species and critically endangered in their own country, and do not pose a risk to our native biodiversity?
- The wildlife Act already bans any wildlife from being released into the wild without a permit from the director general, so why are you not putting your efforts into enforcing that legislation rather than creating your own ban which is not support by any science, if I am wrong, please provide the applicable science for New Zealand.

After reaching out to Biosecurity New Zealand, I was advised that the Bay of Plenty Regional Council is responsible for outlining exemption processes. Therefore, it is essential that you provide clearer guidelines.

Implementing these regulations could inadvertently exacerbate the issue, as individuals may feel compelled to release their turtles if they perceive

the exemption process as complicated. This could lead to an increase in unwanted pet ownership and less regulated trade.

Thank you for considering my submission. I urge you to reconsider these proposed amendments and provide greater clarity for turtle owners.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Whilst there is a degree of uncertainty regarding turtles' ability to survive in the wild in NZ, Bay of Plenty has warmer geothermal soils that may enable turtle survival. Climate change is another factor BOPRC is trying to anticipate. Using other pests as an example, the benefit of hindsight tells us more action should have been taken to prevent some pest populations. Note other Councils (Waikato and Auckland) are managing turtles as an emerging pest. Under this proposal there is no proposed ban on turtle breeding, sale, transportation or requirements for turtles to be registered. The purpose of this proposal is to prevent release and accidental escapes. An exemption is required for pet turtle owners otherwise they would be captured by Rule 6(3). Council proposes a blanket exemption for all responsible turtle owners who provide secure housing for their turtles. Turtle owners would not need to apply for an exemption if they meet the exemption conditions. Council will not be conducting direct or proactive compliance efforts but will respond to complaints regarding poorly secured or unsuitable housing for turtles as necessary. Responsible pet owners need to factor in future scenarios of pet ownership including bigger enclosures or longevity of a pet and current Wildlife Act requirements. Education and advocacy through this RPMP proposal can bring these issues to the forefront of people considering getting a pet turtle. This proposal will support current legislative requirements and address accidental escapees.

- **John Sanson**–Biosecurity New Zealand

We support the inclusion of turtles as a sustained control pest. This aligns with other regional council, such as Auckland’s, rules to address emerging risks and impacts from pet turtles that are deliberately or accidentally released.

We couldn’t see any specific wording for Rule 7(3) re: turtles however the rationale seems sound in relation to a focus on escaped or released pets and having an exemption for current pet owners.

Small typo in red eared slider description, word missing: ‘populations have been establishing’.

We are unsure about the reference to the protection of turtles through the wildlife act, with the exception of red eared sliders. We recommend that this is checked and clarified.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Rule explanation is provided but with incorrect reference. Should be Rule 6 (3). Correction made populations have been establishing’. The Wildlife Act absolutely protects all wildlife regardless of whether it is indigenous or not, unless included in a schedule to that Act, in which case an alternative approach to managing this species would apply.

- **Lance Dartnall**–Wilderness Woodend

The justification for this change lacks sufficient detail, particularly concerning breeding, sale, distribution, rehoming, and movement of turtles. While your plan notes that “there are no native turtles in New Zealand” and mentions the potential ecological risks posed by introduced species, it is important to clarify that many turtles currently kept as pets in New Zealand are tropical species that cannot survive in our climate.

Species such as Painted Turtles (*Emydura subglobosa*) and Box Turtles (*Terrapene* spp.) are particularly vulnerable to respiratory infections due to suboptimal temperatures. Although they may survive for short periods in the wild, they cannot reproduce or establish sustainable populations.

While I understand the inclusion of Red-Eared Turtles in the national pest management program due to their adaptability and rapid growth, extending similar measures to all turtle species is misguided.

Turtles have been kept as pets in New Zealand for decades, and responsible ownership practices have improved significantly. The reduction in commercial breeding of Red-Eared Turtles has led to fewer unwanted pets being released. Additionally, many reptile rescue centres across the country now help manage unwanted animals, further mitigating risks of release.

Given that no new turtle species have been introduced to New Zealand in over 28 years, the perceived “pest problem” is minimal. As a dedicated breeder and reptile enthusiast, I prioritise responsible pet ownership and carefully vet potential owners to ensure they can provide suitable environments for their pets.

Your proposed plan lacks clarity on the exemptions for existing turtle owners. I would appreciate clearer information on the following points:

- How can current owners obtain exemptions?
- Are existing owners allowed to acquire additional turtles?
- What are the regulations for new pet owners?
- Can turtles be transferred between owners?
- Are breeding and transfer permitted for exempt owners?
- How will compliance be monitored?
- What are the consequences for non-compliance, and who will enforce these measures?

After reaching out to Biosecurity New Zealand, I was advised that the Bay of Plenty Regional Council is responsible for outlining exemption processes. Therefore, it is essential for you to provide clearer guidelines.

Implementing these regulations could inadvertently exacerbate the issue, as individuals may feel compelled to release their turtles if they perceive the exemption process as complicated. This could lead to increased unwanted pet ownership and less regulated trade.

I urge you to reconsider these proposed amendments and provide greater clarity for turtle owners.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Whilst there is a degree of uncertainty regarding turtles’ ability to survive in the wild in NZ, Bay of Plenty has warmer geothermal soils that may enable turtle survival. Climate change is another factor BOPRC is trying to anticipate. Using other pests as an example, the benefit of hindsight tells us more action

	should have been taken to prevent some pest populations. Note other Councils (Waikato and Auckland) are managing turtles as an emerging pest. Under this proposal there is no proposed ban on turtle breeding, sale, transportation or requirements for turtles to be registered. The purpose of this proposal is to prevent release and accidental escapes. An exemption is required for pet turtle owners otherwise they would be captured by Rule 6(3). Council proposes a blanket exemption for all responsible turtle owners who provide secure housing for their turtles. Turtle owners would not need to apply for an exemption if they meet the exemption conditions. Council will not be conducting direct or proactive compliance efforts but will respond to complaints regarding poorly secured or unsuitable housing for turtles as necessary. Responsible pet owners need to factor in future scenarios of pet ownership including bigger enclosures or longevity of a pet and current Wildlife Act requirements. Education and advocacy through this RPMP proposal can bring these issues to the forefront of people considering getting a pet turtle. This proposal will support current legislative requirements and address accidental escapees.
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- **Alistair Fairweather**–Waikato Regional Council

We note that Rule 7 is being applied to the proposed new pest animals *Corbicula* spp. and introduced turtle species (see the proposed explanation section for these rules). However, *Corbicula* is a mollusc and turtles are reptiles, therefore Rule 7 as it stands does not apply to them.

Request the following relief:

Amend the wording throughout Rule 7 from 'freshwater fish species and freshwater plant pests' to 'freshwater aquatic pests' to capture the wider group of proposed pests.

We understand Rule 7 is designed to stop one of the key pathways for the spread of aquatic pests. Furthermore, the proposed explanation section states that Rule 7(3) "only intends to capture introduced turtles that have escaped or been deliberately released".

We do not believe that boats/trailers and recreational equipment are a key pathway for introduced turtles establishing in the wild. The key pathway for turtles is liberating unwanted pets and escaped pets. We suggest that it would be better to include a separate rule making it illegal to release turtles. We recognise this is captured by section 52 of the Biosecurity Act 1993, but the commentary within the BOP RPMP (on Page 23) only mentions 'distribute', rather than 'release, or cause to be released' (the wording used in the Act), therefore the public may not understand the meaning

Relief Sought:

Include a separate rule in the RPMP making it illegal to release turtles.

<i>Council decision:</i>	<i>Reason:</i>
Accept	Amend the wording throughout Rule 7 from 'freshwater fish species and freshwater plant pests' to 'freshwater pests' to capture the wider group of proposed pests. Incorrect reference to Rule 7(3) should read Rule 6(3) which covers both distribute and release. No separate rule required.

- **Liesel Carnie**-WBOPDC

Disagree

1. We would like to see eradication or progressive containment considered as the number of wild turtles would be achievable to control and feel that the effort made to eradicate them would be worthwhile. Particularly before they start to breed.
We would hope that the already identified sites, such as Katikati, would be considered an area where the pest is not currently well established therefore, eradication could occur. We would support any investment made by BOPRC.
2. As there is a large amount of community interest in the eradication of this species, we would recommend a density map of recorded sightings is created and made available for registered care groups so they can support the eradication of the wild turtle species, particularly the

species not listed in schedule 5 of the Wildlife Protection Act (not red eared slider turtles). Clarification is sought that community members, care groups and landowners would be allowed and supported where appropriate to exterminate wild turtles if found in public areas such as council reserves. Furthermore, we suggest funding, resources and advice be available to enable eradication by care groups under their care group plan if they would like to do so.

3. If pets are allowed to be kept for the remainder of their natural life, we support that conditions are attached to the exemption such as no releasing into the wild, must have secure habitat, no breeding, and if rehoming (e.g. selling) the turtle's new home must be outside the Bay of Plenty region.

We would like assurances that there has been research into effective controls on this and that adequate resourcing will be provided to ensure current pet owners abide by the rules and rehome turtles outside of the region. We recommend behaviour change science principles are applied to this campaign over education alone as education has proven to not be effective in changing behaviours.

We support any work undertaken to exclude other turtle species being sold or introduced to the region. This is of particular concern knowing that there may become a demand for alternative species for pets.

Relief sought:

Recommend progressive containment or eradication. Clarifications sought for community engagement opportunities

<i>Council decision:</i>	<i>Reason:</i>
Reject	Progressive containment or eradication of turtles is currently not feasible. The financial resources required to implement and maintain such programs are currently too high, particularly considering the complexities and cost involved in capturing turtles and disposing of them in accordance with best practice (euthanasia via certified veterinarians). Additionally, many of the turtle species, aside from red-eared slider turtles, that have naturalised in New Zealand are protected under the provisions of the New Zealand Wildlife Act, which limits our ability to initiate widespread control or eradication efforts. The purpose of this proposal is to prevent the release and accidental escapes and fostering responsible pet ownership. Additionally, this approach focuses on understanding the specific challenges posed by the presence of turtles in the wild. Under the sustained control program, the council will continue to prioritise

	education and advocacy programs to encourage responsible turtle ownership. Council will not be conducting direct or proactive compliance efforts but will respond to complaints regarding poorly secured or unsuitable housing for turtles as necessary. If appropriate, Council can reconsider and reclassify the status of turtles under the RPMP during the next review of the document in 2027-28.
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Pest Conifer Feedback

Proposal: It was proposed that all wilding conifer species in the progressive containment species are included as species in any form (planted or wild)

- **Dallis Hopkinson**–Individual

I agree that conifer species are to be treated as pests in any form.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Prue Burt**–Te Whakakaha Trust

All conifers should be included in the plan

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Prudence A Burt**–Individual

Many conifers can take over the habitat of native bush. This should not be allowed to happen

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Earl Rewi**–Te Runanga o Ngati Whare

Strongly Agree

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Paul Kayes**– Individual

This is good. All pines outside plantations and deliberately planted need to be classed as pests.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Andy Blick**– Individual

Could not find a mention of exactly what conifer species you plan to victimise even further.

Under no circumstances should you be empowered to dictate what trees people can and can't grow on their own land.

It makes my heart sad to see how so much ignorance and meanness tries to rule our lives?

I know, I know, I'm wasting my time.

Tick the box and let the madness move on..

It makes my heart sad. That's all I can say.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Conifer species proposed for inclusion are listed as pest conifers and include Lodgepole Pine, Scots Pine, Dwarf Mountain Pine, Mountain Pine and European Larch. Council has undertaken comprehensive cost benefit assessments to support its approach to management of conifer species.

- **Soweeta Fort-D'Ath**–Individual

Yes pests get rid of them plant native

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Patrick Aranga Clark**–Individual

RPMP needs to include all conifer species as pests and be resourced accordingly to activate iwi, hapū.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Beccy Ganley**–Individual

I support the change

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc
Forest & Bird support the inclusion of further conifer species in the pest management plan.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Eben Herbert**–Eastern Region Fish and Game Council
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Hayley Bennett**–Rotorua Branch of Forest and Bird
Support

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **Michelle Phillips**–Ngati Tahu-Ngati Whaoa Runanga Trust
Controlling wilding conifer species is very expensive and funding is often difficult to obtain, especially now that central government has drastically reduced funding available for this work across the country.

The Runanga has spent large amounts of funding controlling a range of wilding conifer species in both the Waikato and BOP region. Current works include a partnership with DOC to manage many of the species listed in the discussion document (including *Pinus contorta*) on and around Maunga Kakaramaea, as they are a direct threat to indigenous biodiversity, especially those species only found in geothermal areas.

The Runanga supports proposed option 2 in the discussion document-All progressive containment conifer species are listed as a pest in any form (wilding, planted, plantation) and need to be removed.

Removing seed source, no matter what a pest tree's designation is, will minimise seedlings appearing nearby, leading to lower future control costs.

<i>Council decision:</i>	<i>Reason:</i>
Accept	

- **John Sanson**–Biosecurity New Zealand

We generally agree with and support the inclusion of the listed wilding conifers as progressive containment species We do however have a couple of questions:

You state that “Pest conifers’ is the collective term for the following conifers listed in the progressive containment programme, but does not include potted, miniature or sterile hybrids versions of these species.” However *P. contorta* is an unwanted organism, have you considered whether you are able to allow for potted, miniature forms and hybrids without a UO permission.

Any specific reason for the mention of crop tree in the WC definition? Standard text MPI recommends is: Wilding conifers are any introduced conifer tree, including (but not limited to) any of the species listed in Table 1, established by natural means, unless it is located within a forest plantation, and does not create any greater risk of wilding conifer spread to adjacent or nearby land than the forest plantation that it is a part of. For the purposes of this definition, a forest plantation is an area of 1 hectare or more of predominantly planted trees. Can you confirm your definition of a crop tree?

<i>Council decision:</i>	<i>Reason:</i>
Accept	Definition amended to clarify miniature of <i>p. contorta</i> not provided for and reference to crop tree removed.

- **Jesse Brennan**–Federated Farmers

The proposal to include all planted, plantation and wildling trees of the species Lodgepole Pine, Scots Pine, Dwarf Mountain Pine, Mountain Pine and European Larch with progressive containment status is supported by Federated Farmers.

Of these species, only the European Larch has been used as a limited commercial species, so we do not anticipate there to be many farmed properties that have these pine species plantations that will need to be contained.

However the Farm Forestry Association notes that the both European larch (*Larix decidua*) and Japanese larch (*Larix kaempferi*) has been widely planted in New Zealand, with 3,400 ha in plantations in 1988 (Miller & Knowles, 1988). Given that this is old data, Federated Farmers is unsure how much land may currently be in European larch. Larch was suggested as a suitable species for steep slopes as recently as 2018 in this report by Dean Satchwell, so it is feasible there may be plantations of it now. We are concerned that there may be landowners in the Bay of Plenty who have European larch planted as shelterbelts, for slope stability or intended for milling and will need to prematurely remove these trees due to the amendments to the Pest Management Plan.

We hope that all of these species will not be available to purchase at garden nurseries.

Federated Farmers supports the amendment to include all planted, plantation and wilding trees of the species Lodgepole Pine, Scots Pine, Dwarf Mountain Pine, Mountain Pine and European Larch as progressive containment pests.

Federated Farmers submits that the Council investigates how many European Larch has been planted as shelterbelts, slope stability or production forestry, and contacts any affected landowners to come up with a plan in partnership to manage these.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Council accepts that there may be a number of historic larch plantings in the region, particularly as shelterbelt. Council is not aware of any wild infestations of larch in the region therefore believe that most plantings would be the 'sterile' hybrid. If Council was to become aware of any non-sterile infestations, we would work with the landowners to develop a plan to remove and replace the pest larch.

- **Liesel Carnie**–WBOPDC

We would like clarification on timeframes for removal of planted stands due to the potentially substantial removal costs Western Bay of Plenty District Council may incur.

If we are expected to fund/partially fund and deliver the removal of these stands, we would expect the timeframes given would allow Council to undertake the work within council budgets - which may take many years.

Our understanding of "Removal of planted stands is funded and managed by Council using best practice methodology." - page 54 "Potential for mitigation" of "Technical and operations risk", is that BOPRC would fund the removal of any planted species so this should be a moot point.

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	Council accepts that there may be a number of historic larch plantings in the region, particularly as shelterbelt. Council is not aware of any wild infestations of larch in the region therefore believe that most plantings would be the 'sterile' hybrid. If Council was to become aware of any non-sterile infestations, we would work with the landowners to develop a plan to remove and replace the

	pest larch.
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Feedback outside scope of RPMP Partial Review

- **Andy Blick**–Individual

Find other ways of getting what you want without having to kill everything.

Allow people to make their own choices.

Your vision is flawed.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Regional councils are required to show leadership in pest management largely to enable our native species to have a better chance of survival.

- **Paul Kayes**–Individual

Ramp up work with councils, railways, and nzta on corridors where all manner of weed pests exist - pampas, cherry trees, nightshade etc.

Perhaps lawnmowing staff from TCC can add this with BOPRC and other agencies funding support?

<i>Council decision:</i>	<i>Reason:</i>
Accept in part	This submission point is outside the scope of the plan review. However, the Biosecurity team regularly engages with all of the listed agencies to discuss pest issues on the land they manage. While we acknowledge that resourcing and competing priorities creates challenges, and that some agencies, Crown Agencies, are not bound to the RPMP, we will continue to engage around pest issues.

- **Alistair Fairweather**– Waikato Regional Council

We support the inclusion of the proposed pest animals and pest plants in the BOP RPMP.

Retain the pest animals and pest plants proposed to be added to the BOP RPMP

<i>Council decision:</i>	<i>Reason:</i>
Accept	

Good Neighbour Feedback

- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc

The use of the good neighbour rule to give priority to pest management (control and eradication) in buffer areas around council reserves, conservation land, QEII covenants and SNAs and prioritise pest management around high value conservation areas.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of good neighbour rules in the RPMP is outside the scope of this plan review. However the inclusion of good neighbour rules was considered in depth during development of the RPMP. Although it was decided not to include these rules at that stage, Council will consider inclusion of Good Neighbour Rules when pests are threatening Priority Biodiversity Sites. This will be addressed through actions identified in the pending Regional Biodiversity Strategy.

- **Jesse Brennan**–Federated Farmers
CROWN LAND

Federated Farmers submits that central government agencies: Department of Conservation, Kiwi Rail, the New Zealand Transport Agency and Land Information New Zealand are identified as beneficiaries or exacerbators of pest management in the District.

We support the national direction that Crown, road and rail authorities carry out pest management on the land they occupy and that they are bound by the Good Neighbour Rule as stipulated by the Biosecurity Law Reform Act 2012.

Federated Farmers is disappointed that the BoP Regional Pest Management Plan has no good neighbour rules. Section 3.4 of the RRMP states that the Council has signed memoranda with DoC and Waka Kotahi NZ Transport Agency to confirm how pests will be managed on and in places that these organisations are responsible for, which looks to be a substitution for good neighbour rules.

On Crown land, proactive pest control is seldom undertaken to the level required, and it is often only done when an obvious problem develops - by which stage it is generally more difficult to control the pest within the

boundaries. This situation causes problems for farmers and other landowners who bear the costs of poor pest control on adjoining land when it spreads to their own property.

FFNZ views the good neighbour rule as a key step to addressing the ongoing issue of Crown land being non-rateable and otherwise not required to directly contribute to pest management.

With Department of Conservation owning 267,096 ha, and NZTA with 2,455 ha of road and roadside verges in Bay of Plenty, this represents many kilometres of boundary shared between just these two Crown entities and farmers. The RPMP does not say how many hectares of Kiwi Rail land is in the region, but the long narrow nature of the rail corridor means there will be many kilometres of boundary between this Crown entity and farmers. These farmers should not have to labour under the boundary control rule only to see their Crown neighbours not putting sufficient effort into the same. Japanese honeysuckle is a growing problem along roadsides, railway corridors, and esplanade reserves and farmers are disappointed that Crown neighbours are not doing more to keep this weed in check. This honeysuckle is particularly a problem where it smothers the riparian planting that farmers put in to improve their waterways.

TERRITORIAL AUTHORITIES

Federated Farmers supports Section 3.5 which requires the seven territorial authorities within the Bay of Plenty to control pests on land that they occupy in accordance with the rules of this RPMP. Each territorial authority must meet the costs of complying with this RPMP.

One aspect that has been concerning to us nationally is the increasing desire of councils to take esplanade reserves/strips for public access, and then not properly maintaining these, creating a haven for pests and weeds. We are pleased that territorial authorities will be responsible for meeting the rules and costs of complying.

ROAD RESERVES

Federated Farmers is pleased to see that the RRMP states roading authorities are responsible for controlling pests on the road reserves they occupy in Section 3.6 We expect that this includes rest areas, weigh pits and stockpile sites.

Roading contractors often spread pest plants when clearing slips or working on roadsides. They also transport seeds of noxious species with cultivation and harvesting machinery. This is a result of poor hygiene around quarries and river stockpiles, and inadequate cleaning of loaders, buckets and mowers. While of course acknowledging the natural processes of birds and wind, Federated Farmers believes activities contribute to the spread of pests. In our view, the monitoring of metal sources along with contractual obligations on sub-contractors to abide by good biosecurity practice, via a Code of Practice, are needed.

Federated Farmers asks that the Regional Pest Management Plan state specifically when the good neighbour rule is to be applied to any specified

activity, specifically via words to the effect that “the Good Neighbour rule should be applied to any activity where one landholder’s action or lack of action may impact adversely on the resources of a neighbour”.

Relief sought:

That Crown agencies: the Department of Conservation; Kiwi Rail; the New Zealand Transport Agency and Land Information New Zealand are identified as beneficiaries and/or exacerbators of pest management.

That Crown agencies are bound by the rules in the Regional Pest Management Plan and must adhere to Good Neighbour rules.

Federated Farmers supports Section 3.5 of the RRMP stating Territorial Authorities are bound by the rules in the Regional Pest Management Plan, and Section 3.6 stating roading authorities are responsible for controlling pests on the road reserves they occupy.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of good neighbour rules in the RPMP is outside the scope of this plan review. However, the Biosecurity team regularly engages with the other agencies to discuss pest issues on the land they manage. While we acknowledge that resourcing and competing priorities creates challenges, and that some agencies, Crown Agencies, are not bound to the RPMP, we will continue to engage around pest issues. Council is considering inclusion of Good Neighbour Rules when pests are threatening Priority Biodiversity Sites. This will be addressed through actions identified in the pending Regional Biodiversity Strategy.

Additional Pests (Animals)

Lani Kereopa– Individual

Cats are doing just as much damage to our natural environment as wallabies and it is irresponsible of BOPRC & DOC not to have their eradication included within your pest management plans.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Inclusion of additional species to the RPMP is outside the scope of this partial review. However, cats were considered for inclusion

	during development of the current RPMP and they did not meet the criteria for inclusion. Inclusion of cats will again be considered during development of the next RPMP. It should be noted Council staff are keeping abreast of national cat management initiatives.
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- **Elizabeth Simm**–Individual

Please add Canada Geese to your pest list. They are multiplying rapidly and ruining the Carmichael Reserve. The water ways are polluted, and the tracks are covered in their messes so not at all attractive. The childrens playground is also covered in their mess. They are now moving into any open grass area they can find, including the area below my house in Bob Owens Village. The noise at 5.30am is horrible.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review. Canada Geese were considered for inclusion of existing RPMP and a cost benefit assessment was undertaken. They did not meet the criteria for inclusion. They will be considered again in development of the next RPMP.

- **Dallis Hopkinson**–Individual

I think that cats (either domestic or wild) are the biggest pest that New Zealand has ever had and that the lasting effect of not doing anything about this problem will decimate our native forest and it's native bird life. I have a some native trees on my section in Tauranga and see daily the effect of what cats do to the native trees and birds on my section. I should be aloud to trap these domestic cats and the owners should be fined for letting them roam.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review. Cats were considered for inclusion of existing RPMP and a cost benefit assessment was undertaken. They did not meet the criteria for

	inclusion. They will be considered again in development of the next RPMP. Council staff are keeping abreast of national cat management initiatives.
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- **Clair Ellis**–Individual

Please also consider lizards- bearded Dragons of which are now overtaking Red Eared Slider Turtles as the school child's pet of choice.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review. Plague skinks are included as an advisory pest. Other lizards (including bearded dragon) were not considered for inclusion as not considered an emerging pest. Lizards can be considered for inclusion during development of the next RPMP.

- **Lani Kereopa**–Individual

The eradication of stray cats & management of domestic cats must be included in your regional pest management plan.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review. Cats were considered for inclusion of existing RPMP and a cost benefit assessment was undertaken. They did not meet the criteria for inclusion. They will be considered again in development of the next RPMP. Council staff are keeping abreast of national cat management initiatives.

- **Jesse Brennan**–Federated Farmers

Canada Geese

Federated Farmers is concerned that Canada Geese populations are building in numbers in harbour, wetland and lakes areas in the Bay of

Plenty. E.coli contamination in water bodies is a real concern given the intensity of populations building. Also contamination on pasture is a concern.

Federated Farmers recently surveyed members about Canada Geese as part of our National Pests Survey, and found that from August 2023 to August 2024, about 13,000 Canada Geese had been culled by surveyed farmers around the country. This is a huge effort by farmers and demonstrates how Canada Geese populations are becoming a problem again.

Federated Farmers submits that Canada Geese are included in the Regional Pest Management Plan.

Deer, Pigs and Goats

In the absence of any pest control from Department of Conservation, deer numbers are building in the Kaimai ranges and on other public conservation land.

Our recent survey of more than 700 Federated Farmers members from across the country shows feral animals are costing farmers at least \$213 million a year. That figure includes a direct spend of \$5.45 per hectare on pest control (\$74 million per year) and \$10.22 per hectare in lost production (\$139 million per year). Deer, pigs and goats are a significant proportion of this cost.

Unfortunately, Department of Conservation are spending just \$13 million a year managing large browsing animals like goats, pigs and deer, and delivers 1080-based predator control on only around 7.5% of public conservation land annually. Federated Farmers is alarmed that DoC monitoring shows deer and goat prevalence increasing 64% in just the last 10 years. Members consider that DoC needs to do more to uphold it's share of the pest control effort.

Our regional plan should address the control of these species, currently the Plan relies on the Wild Animal Control Act 1977 in Section 2.2.4.

The Regional Pest Management Plan needs to include wild deer, pigs and goats, particularly requiring Department of Conservation to better manage pest animals and comply with the Regional Pest Management Plan.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Canada Geese were considered for inclusion of existing RPMP and a cost benefit assessment was undertaken. They did not meet the criteria for inclusion. They will be considered again in development of the next RPMP. Council has and will continue to invest significant time and resources into the management of feral goats across the region

	with the focus being Eradication east of the Motu River and Progressive Containment across the rest of the region, we are also looking for more coordination and better strategic management with key partners, including but not exclusive to, the Department of Conservation. Feral deer and pigs were not considered in the recent RPMP. Experience from other Councils looking to include these species highlighted the issues with inclusion as many see them as a resource. Equally, the current extent and numbers would require significant investment considered beyond Council currently. It would also require a strategic plan with the Department of Conservation to be effective as re-invasion would be an ongoing issue. We believe, the Department is not resourced to deliver this across the region.
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- **Sam McGowan** Individual

Coming from a scientific background, I like to think about pest management scientifically with facts, not feelings, and certainly not about the finances of an industry that is actively destroying our freshwater biodiversity. I urge consideration of the addition of Salmonids to the RPMP. The regular mass-release of non-native fish into our fragile freshwater ecosystems is destructive, backwards, and an embarrassment to the clean green image of Aotearoa. When asked about native freshwater fish, the vast majority of the population responds "trout?". Unfortunately the 50 or so endemic freshwater fish species are out of sight & out of mind for so many people, and we have critically endangered species being decimated by the drive for a game fishing industry, where all the focus is on preventing selectively bred, brightly colored, easy-prey goldfish from getting into the rivers and lakes. Several Salmonid species, and even hybrids have been proven to breed and sustain populations in rivers and lakes in the BOP. The proposed changes to the RPMP suggest "turtles eat fish, plants, aquatic insects, koura, and small birds including ducklings. Their presence in a waterway can also reduce the water quality." These adverse effects are no real threat from turtles in comparison to the exact same effects, but on a greater scale, that the Salmonids bring. Simply put, the fact that trout are capable of establishing breeding populations in NZ waters warrants immediate addition of these Salmonid species to the RPMP, and the immediate end of the release of fish and support of an industry that thrives off the destruction of NZ's fragile freshwater ecosystems.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for

	inclusion in the RPMP is outside the scope of this plan review.
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- **Heather Wills**–Individual

Brown doves are multiplying at Tanners Pt, people think they are so cute and friendly, so some folk feed them. But I saw them In Fiji when we visited in 1986, around Nadi they were literally “dripping” off the trees, there were so many...and the constant cooing was very monotonous.

There is someone near the petanque court (near the utility/boat ramp reserve here) who feed them copious amounts of grain every day so the doves are multiplying and the seeds attract other birds like mynas etc, and will attract rats and mice, which we are working very hard to eradicate.

Previously I have rung up about the brown doves, to ask if they could be added to the regional pest list, I was told that because they were widespread it would be impossible to eliminate them.....but at least if they were listed as pests, the same as eastern rosellas are, we could ask that people don’t feed them and other folk could quietly catch or shoot them with air rifles without feeling guilty.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review but these species may be considered for inclusion in the next RPMP.

Additional Pests (Plants)

- **Jim Cowern**–Waihi Beach Environment Society (Inc)

Include yuccas, gazanias and osteospernums. Reason - these garden escapes will become more prevalent with climate change (wetter summers). Although generally controlled by Coast Care groups with a significant programme recently undertaken at Whangamata Beach they remain a threat to dune health. The exclusion can be site specific (ie. dunes)

The inclusion of gazanias and osteospernums in the coastal dune environment is an attempt to recognise the significant threat as they can readily become the dominant species overtaking spinifex if left unchecked. We have witnessed this in places at waihi Beach.

Inclusion would be a tacit acknowlegment that the work of volunteers over the years in planting was not in vain.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review.

	Yuccas were considered for inclusion during the development of the existing RPMP and did not meet the cost benefit criteria for inclusion. The suggested additional species can be considered for inclusion in the next RPMP.
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- **Ross Gardine**–Individual

I would like to see the expansion of Phoenix Palm within the RPMP. It should cover Phoenix Palms of any type (self seeded or otherwise). The cost to our economy from injuries and resultant surgeries from Phoenix Palm related injuries is substantive, and are the cause of half of all hand surgeries in NZ.

<https://www.rnz.co.nz/national/programmes/afternoons/audio/2018682989/phoenix-palm-beware-the-undercover-menace-in-your-garden>

Identifying them as a pest plant in any circumstance in the RPMP is the first step, and facilitating financial mechanisms with Council's to provide for their removal (i.e. resource consent costs if they are protected) will lead to good outcomes.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review. Phoenix palm were considered for inclusion during the development of the existing RPMP and did not meet the cost benefit criteria for inclusion. However self-seeded Phoenix palm are a sustained control pest in the RPMP. Phoenix palm have been utilised, and continue to be utilised by many territorial authorities as amenity plantings and BOPRC to not consider it reasonable to expect them to remove amenity plantings. While there is some potential health risks associated with these plants, it is up to the landowner to manage this risk.

- **Chantel Pagel**–Royal Forest and Bird Protection Society of New Zealand Inc

Including Saltwater paspalum in the pest management plan, as it is problematically invasive for our estuarine areas. Could at least have

sustained control status so that it is not sold. With the aim to keep it contained until a method has been developed that enables successful eradication.

Similarly, we suggest the inclusion of palm species such as bangalow, Chinese fan and phoenix palm, as well as divided sedge and monkey apple. The latter is a potent carrier of myrtle rust and could further endanger our pohutukawa trees.

<i>Council decision:</i>	<i>Reason:</i>
Reject	Consideration of additional species for inclusion in the RPMP is outside the scope of this plan review but these species may be considered for inclusion in the next RPMP.