

# Staff Report to accompany the Chatham Islands Pest Management Plan

Under the Biosecurity Act 1993

March 2021



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## Purpose of report

1. In December 2020, Chatham Islands Council resolved that it was satisfied that the Proposal for the Chatham Islands Pest Management Plan (“the Proposal”) met the requirements of the Biosecurity Act 1993 (“the Act”) and directed staff to prepare the Chatham Islands Pest Management Plan (“the Plan”) and a Staff Report.
2. This report accompanies the Plan and provides:
  - a) An overview of the Plan;
  - b) A summary of the Plan development process;
  - c) An assessment of the Plan against the matters specified in section 73 of the Act; and
  - d) An assessment of the Plan against the requirements of sections 74 of the Act.

## Overview of the Plan

3. A pest management plan provides a regulatory tool that is part of the toolbox for the management of animal and plant pests within a region. It is developed in accordance with the process set out in the Act and has mandatory content as set out in that Act. It works alongside other plans and strategies developed by local authorities under other legislation such as the Resource Management Act 1991, the Local Government Act 2002, the Wild Animal Control Act 1977 and the Wildlife Act 1953.
4. The Plan sits alongside a range of non-regulatory and community-based actions and approaches, which make up the Chatham Islands Council’s Biosecurity Programme. Work is additionally undertaken alongside the central government through the Ministry for Primary Industries and Department of Conservation on matters such as incursion detection and response.
5. We note for ease of reference that the Plan defines two classes of species:
  - a) Pests – organisms that are specified in the plan as pests, and which can cause adverse effects to production or to biodiversity.
  - b) Organism of Interest – an organism that may, in the longer term, prove to be a pest, and warrant being watch-listed for ongoing surveillance or future control opportunities.
6. The Council has refined the form of the Plan from its initiation as a Proposal, through to the final Plan. It is compiled in three parts:
  - a) Plan establishment – including statutory background and responsibilities and obligations under the plan;
  - b) Pest management – including pest declarations, objectives, and rules to be complied with, pest descriptions and programmes, and monitoring; and
  - c) Procedures – including powers under the plan (including exemptions) and cost allocation.
7. The Plan sets out a number of responsibilities for the Council. It identifies the management agency for management of pest species for the region, as Chatham Islands Council.
8. It has a key purpose of providing for the protection of the relationship of Moriori and Māori with their ancestral lands, waters, sites, waahi tchap’/wāhi tapu and miheke/taonga. Moriori and Māori involvement in biosecurity is an important part of exercising tchiekitanga/kaitiakitanga.

Mori and Māori also carry out significant pest management through their economic activities and as landowners and/or occupiers.

## Summary of plan development, consultation and amendments

9. Development of the Proposal commenced in July 2020. Early discussions were held with Environment Canterbury biosecurity staff (as Council's contract provider of biosecurity services on the Chatham Islands) to build a picture of the existing biosecurity work programme and priorities for the future. Early drafts of the Proposal and the Chatham Islands Biosecurity Strategy ("the Strategy") were developed based on these discussions.
10. In September 2020, a series of targeted discussion sessions were run on the future of pest management on the Chatham Islands by Environment Canterbury staff. Key stakeholders – including representatives from the community, the Hokotehi Mori Trust, Ngāti Mutunga, Department of Conservation, relevant on-island management agencies, and industry – were invited to attend these sessions, with the purpose of providing an overview of the Proposal and review process and to seek their views on the best approaches to be taken in a new regional pest management plan.
11. In parallel to consultation on the Proposal, comments were also sought on the Strategy. The Strategy is not subject to the same statutory process as the Proposal, but consultation was undertaken at the same time to offer a full overview of Council's proposed biosecurity framework and provide context for the Proposal.
12. In October 2020, a draft package, including the draft Proposal, draft Strategy and supporting information, was provided to all attendees of the discussion sessions, as well as some additional interested parties. The cost benefit analysis report was made available at their request. Written feedback was received from four groups (Hokotehi Mori Trust, Chatham Islands Conservation Board, Taiko Trust and Department of Conservation).
13. The Overview of Consultation on the Proposed Chatham Islands Pest Management Plan and Chatham Islands Biosecurity Strategy (December 2020)<sup>1</sup> is provided as Appendix 1. This provides a detailed overview of feedback received from stakeholders and the subsequent amendments made to the Proposal and Strategy.
14. There was general support for the Proposal and the pests proposed for inclusion, and no significant opposition over any part of the Proposal.
15. There was clear support for the Proposal around proposed rules in the Exclusion programme to prevent the spread of American Foulbrood and varroa bee mite to the Chatham Islands.
16. Other feedback on the Proposal fell into the following main areas:
  - Additional organisms of concern
  - Changes to the management programme proposed for some pests
  - The inclusion of a list of "Organisms of Interest" in the Proposal
  - The inclusion of site-led programmes in the Proposal
  - Shortening of the Plan review period, specifically from 10 years to 5 years

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<sup>1</sup> Available on the Chatham Islands Council website ([www.cic.govt.nz](http://www.cic.govt.nz))

- Minor modifications to the text
17. More general feedback was also received on:
    - The need for greater inclusivity and engagement, with the community and other agencies.
    - Increased advocacy and education, to raise public awareness and gain support for biosecurity concerns.
    - Concerns over high-risk pest pathways onto the islands.
  18. The feedback received through consultation was incorporated into the Proposal, where this was considered appropriate, and amendments were made to a number of sections.
  19. A number of additional pests were added to the Proposal, including:
    - Mustelid (ferret; stoat; weasel) – added to Exclusion Programme
    - Wallaby (Bennett’s wallaby; brush-tailed rock wallaby; dama wallaby; parma wallaby; swamp wallaby) – added to Exclusion Programme in Proposal
    - Argentine ant – changed to: Ant (Argentine ant; Darwin ant) in Exclusion Programme
    - Feral rabbit – changed to: Rabbit – in Exclusion Programme (encompassing both domestic and feral rabbits)
    - German wasp – changed to: Wasp (Common wasp; German wasp) in Exclusion Programme
  20. The remaining organisms raised during consultation were considered to fit more appropriately in the Council’s discretionary work under the Strategy. A list of “Organisms of Interest” was added to the Proposal, to highlight organisms that are of concern but do not currently require inclusion at this time.
  21. Finally, minor modifications of language and clarifications were made to the text in both the Proposal and Strategy.
  22. The Proposal and supporting information were provided to Council in December 2020 for consideration against requirements of the Act.
  23. The process for “making” a regional pest management plan is prescribed under sections 70 to 75 of The Act. There are six key steps to address, which are summarised in Table 1 below. Council resolved that it was satisfied that the development process and Proposal satisfied the relevant requirements of the Act, completing steps 1-4. On this basis, Council directed staff to prepare a Plan and Staff Report, to initiate the process for completing steps 5 and 6.

Table 1 - Steps to "make" a regional pest management plan under the Biosecurity Act 1993

S70, First step	Plan is initiated by a proposal (s70 prescribes the matters that must be set out in the Proposal)
S71, Second step	Satisfaction on requirements (matters the Council must consider and be satisfied with when it approves the Proposal)
S72, Third step	Council is satisfied with consultation, or requires further consultation to be undertaken
S73, Fourth step	Approval of preparation of a final plan and decision on the management agency
S74, Fifth step	Satisfaction on contents of the final Plan and Act requirements being met
S75, Sixth step	Council makes decision to adopt the Plan

24. The Proposal has now been refined into the Plan, by making the following changes:

- Changes in language from "Proposal" to "Plan"
- Addition of seal page and foreword
- Removal of content not required in the final Plan
- Addition of some further contextual information, including the Chatham Islands Council Biosecurity Strategy, overview of the NPD, and the role of community engagement.
- Minor amendments to Plan Objectives and rules, to clarify intent
- Other minor changes to the text

A full list of changes is provided in Appendix 2.

## Assessment against sections 73 and 74 of the Biosecurity Act 1993

25. Appendix 3 provides a detailed overview of how the Plan meets the requirements of sections 73 and 74 of the Act, and the NPD.

26. Staff consider that Council can be satisfied that the Plan and supporting documents satisfy all of the matters required by section 73 of the Act and meet the requirements of section 74 of the Act, including:

- a) The plan is not inconsistent with the National Policy Direction, any other pest management plan or pathway management plan, any regional policy statement or regional plan, or any regulations (section 74(a));
- b) That for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other sources of action (section 74(b));

- c) That for each subject of the plan, persons that are required, as a group, to meet directly the costs of implementing the plan accrue, as a group, benefits outweighing the costs, or contribute, as a group, to the creation, continuance or exacerbation of the problems proposed to be resolved by the plan (section 74(c));
  - d) That for each subject there is likely to be adequate funding for the next 5 years (section 74(d)); and
  - e) That each rule will assist in achieving the plan's objectives and will not trespass unduly on the rights of individuals (section 74(e)).
27. This assessment against sections 73 and 74 of the Act (outlined in Appendix 3) enables Council to complete Steps 5 and 6, as summarised in Table 1.

## Conclusion

28. Council has previously resolved that it is satisfied that the issues raised during early consultation on the Proposal for the Chatham Islands Pest Management Plan have been considered and that the Proposal met the requirements in the Act<sup>2</sup>.
29. Staff have since developed the Plan. Council can be satisfied that the Plan meets the requirements of sections 73 and 74 of the Act and it is recommended that Council adopt the Plan.
30. If Council adopts the Plan, it is also recommended that Council adopt this report as its written report setting out its decision on the Plan in accordance with section 75 of the Act.

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<sup>2</sup> Council resolutions were made at special Council meeting on 9<sup>th</sup> December 2020



# Appendices



# Appendix 1: Overview of Consultation on the Proposed Chatham Islands Pest Management Plan and Chatham Islands Biosecurity Strategy



# Overview of Consultation on the Proposed Chatham Islands Pest Management Plan and Chatham Islands Biosecurity Strategy

December 2020



# 1. Purpose

This document summarises the consultation that has taken place during the development of the Proposal for the Chatham Islands Pest Management Plan (“the Proposal”) as at 20 November 2020. In parallel to consultation on the Proposal, comments were also sought on the Chatham Islands Biosecurity Strategy (“the Strategy”). The Strategy is not subject to the same statutory process as the Proposal, but consultation was undertaken at the same time to provide context to the Proposal. This document outlines the feedback received on the Proposal, although comments received on the Strategy have been included in the appendix to present a full picture of the consultation feedback received.

## 2. Consultation during the development of the Proposal

In September 2020, a series of targeted discussion sessions were run on the future of pest management on the Chatham Islands by Environment Canterbury staff. Environment Canterbury is the contract provider for biosecurity on the Chatham Islands, working on behalf of Chatham Islands Council. Key stakeholders were invited to attend these sessions, with the purpose of providing an overview of the Proposal and review process and to seek their views on the best approaches to be taken in a new regional pest management plan (RPMP).

Nine sessions were held between 22<sup>nd</sup> and the 24<sup>th</sup> September 2020, with representatives from the community, the Hokotehi Moriori Trust, Ngāti Mutunga, Department of Conservation, relevant on-island management agencies, and industry. There was good engagement and interest from participants, who are generally very supportive of the Chatham Islands biosecurity Programme. Key discussion points were recorded for consideration (see Appendix 1), and minor amendments were made to the draft Proposal and Strategy in response to their feedback.

In October 2020, a draft package, including the draft Proposal, draft Strategy and supporting information, was provided to all attendees of the discussion sessions, as well as some additional interested parties. The cost benefit analysis report was made available at their request. Environmental Canterbury representatives also attended a Chatham Islands Conservation Board meeting via video call, to discuss the package. Feedback was received from four groups (Hokotehi Moriori Trust, Chatham Islands Conservation Board, Taiko Trust and Department of Conservation). Appendix 2 provides a detailed record of this feedback and the response provided.

The outcome of this consultation process was general support for the Proposal and the pests proposed for inclusion, and no significant opposition over any part of the Proposal. There were requests for additional organisms to be included in the Proposal and some general clarifications requested in the documents. A summary of consultation feedback is presented below (and in more detail in Appendix 1 and 2).

### 2.1 Ministers

Environment Canterbury met with the Department of Conservation (DOC) Area Manager for the Chatham Islands. In addition to general consultation on the high-level structure of the Proposal and review process, other discussion points were around additional organisms of concern and pathway management concerns.

Written feedback was subsequently received from DOC on the draft package, who are supportive in part of the Proposal and Strategy. However, they provided feedback seeking some amendments, which included: requests for additional organisms to be included as pests; changes to the objective assigned to some pests in the Proposal; the addition of a list of “Organisms of Interest” in the Proposal; the inclusion of a Site-led Programme to protect sites with high biodiversity values; more active engagement between the Council and DOC on biosecurity matters; minor modifications to the text; and a request for more information to be provided on the cost benefit analysis undertaken for the gorse Good Neighbour Rule. See Appendix 2 for details of feedback received and response provided.

The Ministry of Primary Industries were provided with the draft package for review. It subsequently provided advice on minor amendments to ensure the Proposal’s compliance with the Biosecurity Act and National Policy Direction 2015.

## 2.2 Local authorities

Chatham Islands Council is a unitary authority, with both territorial local authority and regional council responsibilities. There are no local authorities immediately neighbouring the Chatham Islands Territory.

Environment Canterbury met with Chatham Islands Council to receive their feedback on the high-level structure of the Proposal and review process. Other discussion points included: additional organisms of concern; alignment with the upcoming Predator Free 2050 programme; pathway management concerns; and the need to increase biosecurity awareness amongst the community through advocacy and education.

## 2.3 Hokotehi Moriori Trust

Environment Canterbury met with representatives from the Hokotehi Moriori Trust to discuss the high-level structure of the Proposal and review process. Other discussion points included additional organisms of concern, the need for alignment with the upcoming Predator Free 2050 programme and the potential for pest management under Site-led programmes.

The draft package was provided to the Hokotehi Moriori Trust for review. Feedback was received, including: questions around the pests included in the Proposal and additional organisms of concern; the need for alignment with the upcoming Predator Free Programme; a request for greater inclusivity and active engagement between the Council and community groups; shortening of the Plan review period from 10 years to 5 years; and modifications to the text in the Proposal and Strategy, including requests for additional Moriori place names and terminology beyond what was already in the documents.

## 2.4 Ngāti Mutunga o Wharekauri Iwi Trust

Environment Canterbury met with representatives from the Ngāti Mutunga o Wharekauri Iwi Trust to discuss the high-level structure of the Proposal. Other discussion points included pathway management concerns, the need to increase biosecurity awareness amongst the community through advocacy and education, and other organisms of concern.

The draft package was provided to the Ngāti Mutunga o Wharekauri Iwi Trust for review. No further feedback was received.

## 2.5 Other persons

Environment Canterbury held discussion sessions with the following key industry and interest groups:

- Chatham Heritage and Restoration Trust,
- Representatives from the farming community
- Representatives from the Chatham Islands Community Fisheries Forum
- Waitangi Port Manager
- Chatham Islands Enterprise Trust

Discussion points in these sessions included pathway management concerns, the need to increase biosecurity awareness amongst the community through advocacy and education, a request for greater inclusivity and active engagement between the Council and community groups, and additional organisms of concern.

The package was provided to these groups for review. No further feedback was received.

Following the initial discussion sessions in September, further consultation was undertaken with:

- Taiko Trust
- Chatham Islands Conservation Board

The Taiko Trust are supportive of the draft package and the list of organisms listed as pests. They raised other organisms of concern, as well as suggesting modifications to the text in the Strategy.

The draft package was provided to the Chatham Islands Conservation Board for review. Representatives for Environment Canterbury dialled into the Conservation Board meeting on 11<sup>th</sup> November to receive their feedback. The Board felt that the Strategy and Proposal could be 'braver', and the current drafts presented a 'missed opportunity', but there was no significant changes requested that supported these assertions and they appear to relate to the Predator Free 2050 programme currently in development. Key discussion points were around the pests included in the Proposal and additional organisms of concern; the need for alignment with the upcoming Predator Free Programme and Chatham Island Conservation Management Strategy; a request for greater inclusivity and active engagement between the Council and community groups; and shortening of the Plan review period from 10 years to 5 years.

## 3. Summary of feedback on the Proposal received through consultation

There was general support for the Proposal and the pests proposed for inclusion, and no significant opposition over any part of the Proposal.

There was clear support for the Proposal around proposed rules in the Exclusion programme to prevent the spread of American Foulbrood and varroa bee mite to the Chatham Islands.

Other feedback on the Proposal fell into the following main areas:

- Additional organisms of concern
- Changes to the management programme proposed for some pests

- The inclusion of a list of “Organisms of Interest” in the Proposal
- The inclusion of site-led programmes in the Proposal
- Shortening of the Plan review period, specifically from 10 years to 5 years
- Minor modifications to the text

More general feedback was also received on:

- The need for greater inclusivity and engagement, with the community and other agencies.
- Increased advocacy and education, to raise public awareness and gain support for biosecurity concerns.
- Concerns over high-risk pest pathways onto the islands

Detailed feedback is provided in Appendix 1 and 2.

## 4. Response to feedback

The feedback received through consultation has been incorporated into the Proposal, where this was considered appropriate (see Appendix 1 and 2 for full details of amendments made). No significant changes were made to the Proposal or Strategy.

Consultees raised several organisms as biosecurity concerns that should be considered for inclusion in the Proposal. For an organism to be designated as a pest in the Proposal, it must be deemed to be high risk, there must be high confidence that a realistic management objective can be assigned and achieved within a set time frame, and there must be a need for regulatory powers or rules to support their management – if powers or rules are not required, then it does not need to be included in the Proposal. However, it should be noted that the Proposal represents only a portion of the biosecurity work carried out by the Council. Council can also opt to carry out additional control under the Strategy priorities: “keep harmful organisms out” and “mitigate the impact of harmful organisms already on the Islands”. With this in mind, each organism raised during consultation was considered to decide whether it was appropriate and necessary to include in the Proposal, or whether management best fitted outside the Proposal, under the wider umbrella of the Strategy.

The following changes were made in response to consultation:

- Mustelid (ferret; stoat; weasel) – added to Exclusion Programme
- Wallaby (Bennett’s wallaby; brush-tailed rock wallaby; dama wallaby; parma wallaby; swamp wallaby) – added into Exclusion Programme in Proposal
- Argentine ant – changed to: Ant (Argentine ant; Darwin ant) in Exclusion Programme
- Feral rabbit – changed to: Rabbit – in Exclusion Programme (encompassing both domestic and feral rabbits)
- German wasp – changed to: Wasp (Common wasp; German wasp) in Exclusion Programme

The remaining organisms raised during consultation were considered to fit more appropriately in the Council’s discretionary work under the Strategy. A list of “Organisms of Interest” was added to the Proposal, to highlight organisms that are of concern but do not currently require inclusion in the Proposal at this time. Site-led projects are considered to sit more appropriately outside the Proposal,

as no regulatory powers are required for this work at this time. Site-led projects are encouraged to be community-led, with support from the Council provided within budgetary constraints.

Finally, minor modifications of language and clarifications were made to the text in both the draft Proposal and Strategy.

Several groups raised the issue of alignment with the Predator Free 2050 (PF2050) programme, and consequently the inclusion of rats, possums and feral cats in the Proposal (for the whole Chatham Islands Territory; currently rats and possums are included in the exclusion programme for Pitt Island/Rangihau/Rangiauria only). While we encourage alignment with other complementary pest management initiatives, the PF2050 programme is still in its initial development phase, and it is therefore too early to fully understand what role Chatham Islands Council will play in the programme and what provisions the Chatham Islands Pest Management Plan would need to provide in support. As the PF2050 programme develops, we will have a greater understanding of what needs to be done and how best to align management objectives. Section 7.4 of the Proposal notes that Council can review the Plan before the 10-year review period is up, to align objectives with other pest management programmes (e.g. Predator Free 2050), should they choose to do this.

Appendix 1 – Summary of feedback from consultation sessions (September 2020)

Topics of discussion during consultation	Group who raised issue/concern
<b>(1) Additional organisms of concern /regulations</b>	
Wallaby - Add to Exclusion Programme	Farming representatives
Feral rabbits - Add to Exclusion Programme	Farming representatives
Rats, possums and feral cats – Add to management Programme to align with upcoming Predator Free Programme	Farming representatives Chatham Islands Council Hokotehi Moriori Trust
Feral cattle – organism of concern For many groups, support for control is dependent on community support, on a site by site basis.	CHART (Chathams Heritage and Restoration Trust) Farming representatives Department of Conservation Ngāti Mutunga Chatham Islands Enterprise Trust Chatham Islands Council Hokotehi Moriori Trust
Feral horses – organism of concern For many groups, support for control is dependent on community support, on a site by site basis.	CHART (Chathams Heritage and Restoration Trust) Farming representatives Department of Conservation Ngāti Mutunga Chatham Islands Enterprise Trust Chatham Islands Council Hokotehi Moriori Trust
Black swan – organism of concern	CHART (Chathams Heritage and Restoration Trust) Chatham Islands Council Hokotehi Moriori Trust
Raupo – organism of concern	Farming representatives
Pampas – organism of concern	Farming representatives Department of Conservation
Site-led programmes to protect sites with high biodiversity values	Farming representatives Hokotehi Moriori Trust

Pathogens – including bovine diseases	Ngāti Mutunga Farming representatives
Domestic cat – mandatory de-sexing and micro-chipping	CHART (Chathams Heritage and Restoration Trust) Farming representatives Department of Conservation Hokotehi Moriori Trust
Ban on importation of second-hand bee equipment and products	CHART (Chathams Heritage and Restoration Trust) Farming representatives Department of Conservation Chatham Islands Enterprise Trust Chatham Islands Council
<b>(2) Increased education and advocacy to raise public awareness</b>	
The need to improve biosecurity awareness in visitors to the islands, and also in the community, including increased education in school	CHART (Chathams Heritage and Restoration Trust) Chatham Island Community Fisheries Forum Waitangi Port Ngāti Mutunga Chatham Islands Council
<b>(3) Pathway management concerns</b>	
Increasing risk posed by tourism	Chatham Island Community Fisheries Forum Department of Conservation
The need for improvements in marine biosecurity e.g. restrictions on moving long-term moored vessels at Port Hutt; ensure notification of vessel movements is happening	Farming representatives Chatham Island Community Fisheries Forum Waitangi Port Chatham Islands Enterprise Trust Chatham Islands Council
Concern around the biosecurity risk posed by imported equipment to the Islands (e.g. farming, firefighting).	Department of Conservation
Greater support required for incorporating biosecurity requirements into contractual arrangements (e.g. during infrastructure projects).	Chatham Islands Enterprise Trust
<b>(4) RPMP process</b>	
RPMP review after 5 years rather than 10 years.	Farming representatives Ngāti Mutunga

Appendix 2 – Detailed feedback from consultee review (October-November 2020) and proposed resolution

Comment reference	Strategy/Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
1	Strategy/Proposal	Hokotehi Moriori Trust, Susan Thorpe	Both plans are urgently needed and we congratulate you on quick preparation after consultation. However, we had hoped the plans would take a braver approach in anticipation of a successful Predator Free Chathams project starting soon.	Alignment with Chathams Predator Free Programme.	<p>CIC support alignment with Predator Free programmes. As the Chathams PF2050 programme is still in its early development phase, it is currently too early to fully understand what role CIC will play and what provisions the Plan may need to provide in support. As the PF2050 programme develops, we will have a greater understanding of what needs to be done and what objectives the Plan would seek to achieve. The Plan may be reviewed in a few years, once the PF2050 programme has been established. Section 7.4 of the proposed Plan outlines that the Council can review the Plan at any time to align objectives with other pest management programmes (e.g. Predator Free 2050).</p> <p>The Strategy notes that a Chatham Islands Predator Free Programme is in development, and that it will be important to coordinate and align actions to support this.</p>
2	Strategy/Proposal	Hokotehi Moriori Trust, Susan Thorpe	In general, your tables are difficult to read – perhaps they need to be presented in landscape format, or look at images to better present objectives	Tables are hard to read.	Tables have been used to encapsulate a lot of information into a logical format. The documents will be subject to graphic design as they are finalised.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
3	Strategy/Proposal	Hokotehi Moriori Trust, Susan Thorpe	Overall the plans are very wordy and could be more effective with the use of flow diagrams and images. Can you look at producing summary documents for use on websites and find ways to updates the plan appendices (eg location maps of pests) online. The appendices in the Pest Plan will quickly become outdated.	The documents are too wordy. Could summary documents be made available for use online? Can an online system be set up for entering new information on pest locations?	<p>The Plan legally must contain certain information to comply with the Biosecurity Act, and a standard template has been used to align with other regional council Pest Management Plans. We have attempted to keep the Strategy as concise as possible, while still including all the information that needs to be in there.</p> <p>Summary documents may be developed following the completion of the strategy and Proposal. This will be at CICs discretion and as time and budgets allow.</p> <p>As the Proposal is a statutory document, it cannot be updated until it is reviewed. This means the maps must be 'point in time'. However, they represent the knowledge we have at this point of time and will provide a baseline to monitor against.</p> <p>There is currently no system for adding pest location information online. New information on pest locations can be provided to ECan staff.</p>
4	Strategy	Hokotehi Moriori Trust, Susan Thorpe	2.1 Thank you for using the 3 names for the 2 large islands but please can you also use the indigenous names for the nature reserves (SE/Hokoreoro/Rangatira and Mangere/Maung' Rē) and explain why you have used only English names for rest of document	Add Moriori/Maori names throughout	Text amended to include Moriori/Māori names for the nature reserves (SE/Hokoreoro/Rangatira and Mangere/Maung' Rē) and use "Chatham Island/Rēkohu/Wharekauri" and "Pitt Island/Rangihau/Rangiauria" throughout Strategy and Plan.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
5	Strategy	Hokotehi Moriori Trust, Susan Thorpe	2.2 – statement that nature reserves are “unspoilt environments” is not the case. Until quite recently both were farmed so the regeneration is very recent and highly managed. It is an important point because the original indigenous ecology has not been restored and they remain highly modified habitats	Change statement that smaller offshore islands are “largely unspoilt” (they are recently regenerated)	Text has been amended to reflect this.
6	Strategy	Hokotehi Moriori Trust, Susan Thorpe	2.2 Chatham mudfish – data on this is out of date – our last few years of monitoring has found mudfish in a range of locations not recorded before	Change statement that mudfish only known at 4 sites (now known in more locations)	Text has been amended to reflect this.
7	Strategy	Hokotehi Moriori Trust, Susan Thorpe	Widespread land clearance did not take place until after 1838 – not since human habitation – please amend	Change statement that widespread land clearance has occurred since human settlement	Text has been amended to reflect this.
8	Strategy	Hokotehi Moriori Trust, Susan Thorpe	Importance to imi and iwi – “number of spiritual sites located in proximity to the coast”. Note that these are all Moriori so if you are not going to correct this best to delete	Change statement that there are a number of spiritual sites located in proximity to the coast of importance to imi and iwi – these are all Moriori so delete “iwi”	Text has been amended to reflect this.
9	Strategy	Hokotehi Moriori Trust, Susan Thorpe	2.4.2 – add rats, hedgehogs, Canada geese and Australian frog species to list of invasive pests. Delete goats as they have been eradicated – or are almost gone or at least explain this. Could be a good place to note that due to isolation we can manage biosecurity but we rely on voluntary compliance – i.e. all introductions have been deliberate	Add rats, hedgehogs, Canada geese and Australian frog species to list of example pest species. Delete goats. Note that all introductions have been deliberate – we can manage biosecurity due to isolated but rely on voluntary compliance.	This is simply a list of examples of pests that threaten the terrestrial environment, rather than an exhaustive list. The text has been amended to include rats, hedgehogs and Canada geese.  As this list refers to terrestrial pests rather than freshwater pests, Australian frog species have not been included (but refer to comment below).

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
10	Strategy	Hokotehi Moriori Trust, Susan Thorpe	<p>2.4.3 – add frogs to list of problems and update this section – it is currently too light and implies there is not much potential for threats which is not the case (what about lack of riparian protection and impacts of farm animals?). Actually there is really good information on our freshwater systems – <b>see the HMT report</b> which is a statutory document that the Council has to have regard to.</p> <p>2.5 – see comments regarding freshwater environments – we do have a lot of information</p>	<p>Include more discussion on the potential threats to freshwater systems.</p> <p>Add frogs to list of potential freshwater pests.</p> <p>Refer to HMT report for more information on freshwater systems.</p> <p>Correct section 2.5 –we have a lot of information on FW environments.</p>	<p>Section 2.4.3: Text amended in section 2.4.3 to reference HMT freshwater systems report (2019).</p> <p>Frogs have been added to the list of potential freshwater species that can cause problems for native habitats/species.</p> <p>Section 2.5: Text amended to reflect this.</p>
11	Strategy	Hokotehi Moriori Trust, Susan Thorpe	<p>Why aren't tchakat henu/tangata whenua included in the list of interested agencies/groups?</p> <p>Please include the CI Conservation Board in the list of agencies – major oversight given the Board's role</p> <p>Agencies – include shipping company and Air Chathams and any future freight companies delivering by air or sea</p>	<p>Include tchakat henu/tangata whenua and CI Conservation Board in the list of interested agencies/groups</p>	<p>Tchakat henu/tangata whenua and the Conservation Board have been included in Section 3.2.4 as “other groups with non-statutory roles”</p> <p>Ports and industry (e.g. shipping companies, tourism operators) are already listed in Section 3.2.4. Air Chathams has been added in the industry examples.</p>
12	Strategy	Hokotehi Moriori Trust, Susan Thorpe	<p>Management challenges – include deliberate introductions from people – been pretty much the main threat to biodiversity</p>	<p>Mention that deliberate introductions from people are the main threat to biodiversity.</p>	<p>Text has been amended to reflect this.</p>
13	Strategy	Hokotehi Moriori Trust, Susan Thorpe	<p>There needs to be a reference to pathogens and problems such as varroa, myrtle rust and bovine diseases</p>	<p>Add reference to pathogens</p>	<p>Text has been amended to include that pathogens are a concern.</p>
14	Strategy	Hokotehi Moriori Trust, Susan Thorpe	<p>3.2 – find another word for ‘space’ – its jargon and not a clear word for what is meant here</p>	<p>Use alternative word for “space”</p>	<p>Text has been amended to reflect this.</p>

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15	Strategy	Hokotehi Moriori Trust, Susan Thorpe	I don't think you have really addressed the fact that we have no border security because technically we have no border. I thought this strategy was seeking to gain support for some kind of border security esp. given the proximity to Nature Reserves	The Strategy does not fully address the problem of border security.	<p>The Strategy discusses the importance of an effective border biosecurity programme.</p> <p>CIC has an active border biosecurity programme in place to manage pathways onto and around the islands. This is a key part of CIC's biosecurity programme, with one third of its biosecurity budget is currently spent on this. As part of this, contractor SPS Biosecurity puts considerable effort into biosecurity measures in mainland NZ ports, to prevent new organisms finding their way to the islands.</p> <p>However, further investigation is required to understand if a hard border can be put in place on the islands and who's responsibility it would be to operate it. CIC will increase efforts to raise awareness of biosecurity needs to visitors to the islands, as well as the community (e.g. information provided at airport).</p>
16	Strategy	Hokotehi Moriori Trust, Susan Thorpe	Why don't you include a table of when and how all the animal pests we have now were introduced so people understand the human element in terms of biosecurity risks? I can provide references	Include information on when and how all animal pests were introduced to the islands to demonstrate the human element of biosecurity risk.	<p>The information suggested does provide a valuable educational tool to help people understand the impact their actions could have. However, the purpose of the Strategy is to direct the work of the Council, including the need for more education and advocacy. It is not intended to be an educational tool itself. The background information in the Strategy is intended to provide only a brief context to the strategy.</p>

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17	Strategy	Hokotehi Moriori Trust, Susan Thorpe	Principles – how about something on being inclusive and being actively engaged with the community? And have a principle that refers to being responsive to regular reviews and updates	Include principles on being inclusive and being actively engaged with the community; and being responsive to regular reviews and updates.	<p>The text in the Principles section has been amended to emphasise inclusivity and active engagement.</p> <p>CIC are committed to inclusivity and active engagement with the community. The biosecurity team encourage members of the community to get in touch should they have any ideas or concerns they would like to raise and discuss. CIC acknowledges the local expertise available in the community and the value it can add to the biosecurity programme.</p> <p>The biosecurity team will commit to a member of the biosecurity team being present at Conservation Board meetings to provide the opportunity to share updates, ideas and concerns. Following the initiation of the Plan, annual operational plans and reports will also be developed, which will raise awareness of what work is underway and upcoming.</p> <p>The Strategy’s principles reflect these intentions, stating that we need to work with the community and maintain strong links. Additionally, Figure 3 (section 3.3) outlines the need for engagement and to be responsive to community ideas and opportunities.</p>
18	Strategy	Hokotehi Moriori	Your figures and tables are too small to read and too wordy – will they be produced in a larger format?	Revise figures and tables as they are too wordy and the text too small.	It is a challenge to present the information required in simple and clear diagrams and tables. Before the Strategy and Plan are

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		Trust, Susan Thorpe			published, they will go undergo design work, which is likely to change the format.
19	Proposal	Hokotehi Moriori Trust, Susan Thorpe	The timeframe for review needs to be shorter than 10 years or at least flexible to provide for a review should pest and biosecurity status changes warrant it.	Review period of 10 years needs to be shorter or at least flexible.	<p>A ten-year review period has been included in accordance with the Biosecurity Act. Section 1.4 of the Proposal states that “It is proposed to remain in force for a period of 20 years, with a full review taking place after 10 years, or prior if Council considers it necessary”.</p> <p>CIC can therefore opt to undertake a review before 10 years has passed, should circumstances change (such as to align with Predator Free objectives).</p> <p>The standard review period is 10 years, rather than a shorter period (e.g. 5 years), to reflect the cost and administration effort required to undertake a full review.</p>
20	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Please use all names for the islands (the 2 main islands have 3 official names now). Both plans require updates to your maps to ensure all the official names are used. We can supply the Moriori names if you like.	Use "Chatham Island/Rēkohu/Wharekauri" and "Pitt Island/Rangihaute/Rangiauria" throughout documents, including maps.	Text amended to "Chatham Island/Rēkohu/Wharekauri" and "Pitt Island/Rangihaute/Rangiauria" throughout Strategy and Plan.
21	Proposal	Hokotehi Moriori Trust, Susan Thorpe	If you use Maori terms please also use Moriori equivalent kaitiakitanga = tchiekitanga and taonga = miheke	Add Moriori terms (kaitiakitanga = tchiekitanga and taonga = miheke).	Text amended to reflect this.
22	Proposal	Hokotehi Moriori Trust, Susan Thorpe	4.1– this list is supported though we note it does not include pathogens. Obviously this is difficult to control but it is a really important matter to address and to attempt containment at the very least. We	Pathogens should also be listed as pests.	Pathogens have been considered for inclusion in the Plan, and American foulbrood is named as an Exclusion pest.

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			have evidence of die-back disease on the island already and obviously want to avoid any myrtle rust exposure.	Die-back disease is already a concern and we want to avoid myrtle rust exposure.	Myrtle rust is designated by MPI an “Unwanted Organism” under the Biosecurity Act, which provides restrictions intended to restrict its spread.  Myrtle rust was considered for inclusion, but there is no management tool for this and no way to prevent its arrival (being windborne). Instead, it is included this as an “Organism of interest”, which means that the biosecurity team will monitor for its presence.
23	Proposal	Hokotehi Moriori Trust, Susan Thorpe	9.3.1 – don’t assume the coastal marine area is the only area of importance to Moriori. Not sure why this has been singled out especially when our range of island ecosystems is so diverse. Impacts on freshwater and forests systems are just as important	Emphasise that Moriori are not only concerned about coastal/marine	This text wasn’t intended to imply that the coastal marine area is the only area of importance to Moriori, rather that protecting the coastal marine area would be one of the benefits of the Plan for Moriori.  The text has been amended to clarify this.
24	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Appendices – if you are including all species in the exclusion list – explain why animals we don’t have are featured and update you location maps with more recent information esp for pest plants. Although this is information that will become quickly outdated so perhaps leave this out?	Why are there species we don’t have on the islands featured in the appendices. The pest maps need to be updated, especially for pest plant species. These distribution maps will quickly become outdated.	The Plan legally needs to include information on the adverse effects caused (or threatened) by every pest listed in a management programmes, including the Exclusion programme.  The pest distribution maps have since been updated to reflect the most up to date distribution information held by CIC.
25	Proposal	Hokotehi Moriori Trust, Susan Thorpe	The plan includes rabbits, wallaby and other animals that are not here (and therefore listed as excluded). Is this because they are listed to prevent introductions? If so, please can this be made more transparent? Some animals are listed as excluded but they are here	Clarify the purpose of the Exclusion list and clarify the difference between tables 2 and 3.	The Exclusion Programme is designed to prevent the establishment of new pest organisms that are present in New Zealand but not yet established in an area. There are two parts to the Exclusion list: (A) pests that

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			<p>(hedgehogs). We think you should list species that are already here but categorised for exclusion and /or eradication separately from those you are intending to never let in. the distinction between tables 1, 2 and 3 is not clear.</p> <p>In many ways its odd to have rabbits and wallabies listed – why not list all pest species in NZ – eg trout, carp, hare, thar, deer etc. Their absence implies that they are not to be excluded</p>	<p>Why are rabbits and wallabies listed, why not all pest species in NZ?</p>	<p>are not yet present within the Chatham Islands Territory, and (B) pests that are present on Chatham Island but have not yet reached Pitt Island. Pests named in this programme are deemed a high risk for introduction, either accidentally or deliberately.</p> <p>Table 3 separates out these two categories of Exclusion pests (“Part A” and “Part B”) and there is explanation of this in the accompanying text. Table 2 also has notations to indicate whether a pest is to be excluded from the entire territory, or Pitt Island only.</p> <p>Ultimately, CIC doesn’t want any new organisms coming to the islands. However, it isn’t possible to name every New Zealand pest in this Plan. Instead we have focussed on those that are most likely to arrive, such as small animals that are easily transportable and more likely to “hitchhike” over undetected (e.g. rabbits, mustelids, wasps, ants, plague skink).</p> <p>Larger mammals, such as deer, are unlikely to be accidentally introduced and cannot be transported easily without detection. Large mammals are also subject to movement requirements by MPI (i.e. for bovine TB), which means that they will be detected before transport. Other animals, like Tahr,</p>

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					<p>are already controlled through legislation (the Wild Animal Control Act).</p> <p>Wallabies are included in the Exclusion list, due to the fact their status as “Unwanted Organisms” with MPI will expire in 2021 and they are becoming an increasing problem in mainland New Zealand.</p> <p>Explanation of tables:</p> <p>Table 2 is intended to provide a list of all the pests that have been included across the Plan pest management programmes, grouped by “type” (either plant, animal or pathogen) and alphabetised to allow people to easily search for a specific organism.</p> <p>In Section 6, each pest management programme is covered separately. For each programme there is a separate table that lists which pests are included in that programme. Table 3 lists the pests included in the Exclusion programme only.</p>
26	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Hedgehog and possum should be in the eradication list for both islands	Add hedgehogs and possums to Eradication Programme for both islands.	Hedgehog and possums are at too high numbers on Chatham Island to aim for eradication at this time. The Plan particularly targets high-risk, low incidence organisms that can realistically be eradicated in the short-term. Pest control for other harmful organisms can still be undertaken (by anyone) if it is not named in the Plan.

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					Hedgehogs and possums are listed on the Exclusion list for Pitt Island, to prevent their establishment there.
27	Proposal	Hokotehi Moriori Trust, Susan Thorpe	List all three rat species separately in case we need to have a controlled population of kiore maintained	Include 3 rat species as separate pests, rather than grouped as "rats".	Rats are currently only included on the Exclusion list to prevent their establishment on Pitt Island. The actions required to exclude rats will be the same for all 3 species; therefore, they don't need to be separated out here.  When the Plan is reviewed (e.g. for alignment with the Predator Free programme), it will need to be considered if, and how, rats may be included in the Plan.
28	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Gorse – can we lift this to aim for eradication?	Add gorse to Eradication Programme.	Gorse is so widespread at present that it's not feasible to achieve eradication in the duration of this Plan. Instead, it is included in the Sustained Control programme to prevent the situation from worsening, while we tackle pests that can be eradicated. Once we have eradicated those easier "wins" we can focus more resources on the harder to control pest species.
29	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Frogs are not on the list for eradication and yet they are significant pests. The green frog was listed in the previous plan	Add invasive frogs to Eradication Programme.	Invasive frogs have been included to the list of "organisms of interest" in the Plan, to acknowledge they are an issue we need to keep an eye on.  There are no existing methods for efficient and effective control of invasive frogs, so at present the ability to respond is limited. The old Pest Management Strategy (PMS) was able to list a lot more pests than this Plan, as

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					<p>listed pests didn't require active management, and the majority of pests were included under a "surveillance" category. The new requirements for the Plan mean every pest listed must have an objective and achievable management plan in place.</p> <p>The Strategy highlights that where we lack the knowledge to manage a species successfully, there needs to be work undertaken to try to fill these knowledge gaps, likely through partnerships with others (such as DOC or science providers). CIC will keep abreast of any new developments in control methods that could help to control frogs in the future.</p>
30	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Why are mice not listed for control on Pitt Island at least?	Add mice as pest in Plan.	<p>Mice have been added to the list of "organism of interest".</p> <p>Mice are an issue, although difficult to control effectively. This means that an achievable objective cannot be assigned in the Plan at this time. Further work needs to be undertaken with the community and other agencies to identify how to effectively control mice.</p>
31	Proposal	Hokotehi Moriori Trust, Susan Thorpe	Tables 8 and 9– font too small – need better presentation of your tables. Put in landscape format	Revise Tables 8 and 9 to make clearer. Text too small. Put into landscape format.	Table 8 and 9 contain information that needs to be presented in this "proposed" version of the Plan only. They will not be presented in the final version of the Plan.

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32	Proposal	Hokotehi Moriori Trust, Duane Trafford	<p>Whilst I understand that the proposed RPMP is modelled on established RPMP plans throughout New Zealand, which allows ease in establishing pathway management plans and adhering to National Legislation. I feel that the proposed plan needs to be weighted heavily towards recognising the unique flora and fauna on the Chatham's, a lot of which already holds an 'endangered' or 'at risk' status.</p> <p>The purpose of this proposed RPMP is to minimise the adverse effects that 'specified' pests and harmful organisms have on our unique flora and fauna. Because of this, we should view this proposed RPMP as an opportunity to control species that haven't been traditionally seen as pests, and include these species within the RPMP.</p> <p>For the purpose of this RPMP, I would suggest that we take the opportunity to add the following animals into Table 2, so that they are classed as pests, and we have the opportunity to treat them as pests should the necessity arise. I'm not suggesting that we look to eradicate these animals in all instances, but look for progressive containment, or eradication/ sustained control in areas of special interest to reduce or eliminate any potential adverse effects.</p> <p>If they aren't included in the plan, we don't have the option to enforce any action should that be required. The understanding needs to be that we aren't looking to eradicate these keys species to locals from the island in entirety, but wish to have the scope to undertake control</p>	Add feral cattle to Eradication Programme, in areas like Taia and sand dunes, and Sustained Control Programme in other areas	<p>Feral cattle have been included in the Plan as an "organism of interest".</p> <p>Work will be done on sites where there is support from the community, and the budget permits. Landowners are also encouraged to carry out their own control on their own land, should they wish to.</p> <p>Feral cattle don't need to be included in the Plan for this work to be done, and their management is better suited to being undertaken outside the Plan. This provides a more community-focussed approach, greater flexibility and helps to deal with challenges, such as identification of feral versus domestic stock, and landowners who are not supportive of control on or near their land.</p>
				Add feral sheep to Eradication Programme, in areas like Taia and sand dunes, and Sustained Control Programme in other areas	<p>Feral sheep have been included in the Plan as an "organism of interest".</p> <p>As for feral cattle, management of feral sheep sits more appropriately outside the Plan, under the Strategy. Work will be done on sites where there is support from the community, and the budget permits. Landowners are also encouraged to carry out their own control on their own land, should they wish to.</p>
				Add feral horses to Eradication Programme, in areas like Taia and sand dunes, and Sustained	<p>Feral horses have been included in the Plan as an "organism of interest".</p>

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			and enforce control in key areas should those areas need it.	Control Programme in other areas	As for feral cattle, management of feral horses sits more appropriately outside the Plan, under the Strategy. Work will be done on sites where there is support from the community, and the budget permits. Landowners are also encouraged to carry out their own control on their own land, should they wish to.
				Add feral cats to Eradication / Sustained Control Programme	Feral cats have been included in the Plan as an “organism of interest”.  Feral cat control will remain outside Plan and managed under the Strategy at this time. The domestic cat de-sexing programme will continue with the addition of compulsory micro-chipping.  When the Predator Free programme is underway, the Plan may be reviewed to align objectives, and feral cats may be considered for inclusion at this time.
				Add black-backed gulls to Sustained Control / Progressive Containment Programme	Black-backed gulls have been included as an “organism of interest in the Plan”. This organisms does not needs to be designated as a pest unless powers or rules under the Act are needed to aid its control.  Pest control can be undertaken when the population has got out of balance in an area and a knock-back is required to protect biodiversity. Work will be done on sites where it is necessary, and the budget permits.

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				Add Feral pigs to Eradication Programme in sensitive areas and Sustained Control Programme wherever else necessary	Feral pigs have been included in the Plan as an “organism of interest”.  As for feral cattle, management of feral pigs sits more appropriately outside the Plan, under the Strategy. Work will be done on sites where there is support from the community, and the budget permits. Landowners are also encouraged to carry out their own control on their own land, should they wish to.
				Add black swans to Eradication / Sustained Control Programme	Management of black swans sits more appropriately outside the Plan, under the Strategy. CIC is already actively involved in regular culls, in partnership with the community and gun club, and don’t need powers under the Biosecurity Act to do this work. CIC will step up coordinated culls in response to community feedback.
33	Proposal	Hokotehi Moriori Trust, Duane Trafford	Additionally, I have found Briar Rose ( <i>Rosa Rubiginosa</i> ) growing wild on Henga Farm, which I haven’t seen elsewhere on the island. If that’s actually the case or there are only small pockets of it, then I suggest that we add that to the Plant Organisms list for eradication.  And possibly the same should be considered for the Boxthorn( <i>Lycium ferocissimum</i> ).	Add briar rose ( <i>Rosa rubiginosa</i> ) to Eradication Programme	Briar rose has been included in the Plan as an “organism of interest”.  CIC don’t currently know enough about its distribution to confidently assign it to a management programme in the Plan.
				Add boxthorn ( <i>Lycium ferocissimum</i> ) to Eradication Programme	Boxthorn has been included in the Plan as an “organism of interest”.  CIC don’t currently know enough about its distribution to confidently assign it to a management programme in the Plan.
34	Strategy	Taiko Trust, Mike Bell	The Taiko Trust fully support the Biosecurity Strategy, and endorse the	Support vision and key outcomes of the strategy	No action required.

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			vision of the strategy, especially protecting the unique biodiversity. The Taiko Trust also support the key outcomes of the strategy.		
35	Strategy	Taiko Trust, Mike Bell	The Strategy provides a good brief summary of the islands unique floral and fauna, and the current dire state of some of the endemic species. However, although the Strategy states new pest could threaten endemic species, the Taiko Trust feels that this should be more strongly stated and reinforced. The protection of our island's biodiversity is paramount and should be a cornerstone of this document.	State more strongly that new pests could threaten endemic species.	Text has been amended to reflect this.
36	Strategy	Taiko Trust, Mike Bell	The Threats are well documented in the strategy, and the need for greater understanding on the current range and risk of pests is highlighted. Significantly the fact that Pitt Island lacks numerous species present on main Chatham is highlighted, and strong biosecurity between the island group acknowledged. We support this approach, and feel protecting Pitt, and the offshore islands is a key component of the document.	Supports threats outlined in document, and that Pitt and other offshore islands need to be protected from pests on main island that are not there.	No action required.
37	Strategy	Taiko Trust, Mike Bell	The Management Challenges are well laid out. However, we feel that the control of existing pests, and the prevention of new pests arriving on the island should be separated out to highlight the need for a strong border. Many existing pests are well established and are likely to only have effective management in certain areas. However, all new pests must be prevented from arriving on the island or becoming established. Separating these in the strategy is likely to give greater strength and significance to border protection.	Separate out the need to control existing pests, and the prevention of new pests arriving on the island, and emphasise the need for a strong border in section 2.5.	Text in section 2.5 has been amended, to ensure this is clear.  Note, these are separated out in the biosecurity priorities in section 4.2 (our priorities): "keep harmful organisms out" and "mitigate the impact of harmful organisms already on the Islands"

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38	Strategy	Taiko Trust, Mike Bell	Control of potential new plant pests coming to the island appear to be relying on using the NPPA, however it is possible that a number of species which are not currently established in the Chatham's may not be on the NPPA. The NPPA should be reviewed to ensure that it is effective for the Chatham Islands. Species of Pinus (i.e. contorta) and Douglas Fir with their extremely high wilding risk for example should be prevented from being allowed in the Chatham's. With the Billion Trees initiative also promoting exotic trees being planted it is important that potential harmful species are not given access to the island. It is likely than a number of commercial species, with high spread risk are not on the NPPA, and the Biosecurity Strategy needs to ensure this is covered.	New commercial species with high spread risk may not be on NPPA (e.g. Pinus contorta and Douglas fir). Risk of Billion trees initiative promoting planting of exotic species.	<p>In section 3.2.1, text has been amended to clarify that national initiatives will be supported where their outcomes align with the outcomes of Chatham Islands Council.</p> <p>It is unreasonable to include every plant that is not on the NPPA on the Exclusion list. However, the border programme does endeavour to pick up every organism that may be transported to the islands, and assess the risk it poses, even if it's not specifically named on the Exclusion list.</p> <p>All new exotic species for commercial forestry (bishops pine, contorta (lodgepole pine), Corsican pine, Douglas fir, larch, maritime pine, mountain pine and dwarf mountain pine, ponderosa pine, radiata pine and scots pine) have been added to the list of "organisms of interest" in the Plan, to highlight that they could pose a potential issue in the future. However, it is considered that there is currently a low risk of these species coming to the islands and becoming established. This can be reviewed as and when more information becomes available.</p> <p>Pinus contorta is designated an "Unwanted Organism" by MPI and therefore its movement is restricted.</p>
39	Strategy	Taiko Trust, Mike Bell	The Taiko Trust fully supports pathway management. The most effective control is preventing any new pest gaining access to the island. The fact that all freight comes in from only a small number of locations Napier, Timaru ports, and	Supportive of pathway management approach.	No action required.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
			Auckland, Wellington and Christchurch airport, means that effective biosecurity should be feasible.		
40	Strategy	Taiko Trust, Mike Bell	The Taiko Trust supports the Biosecurity Priorities. Especially that the prevention of new pests arriving in the Chatham's as the highest priority. The layout of this section of the document gives better focus on preventing new pests from establishing, separating it out from, and with higher priority controlling established pests. Prevention in this case is certainly the best cure. We support the goals and outcomes of these biosecurity priorities.	Supportive of biosecurity priorities.	No action required.
41	Strategy	Taiko Trust, Mike Bell	Our last comment relating to the Biosecurity Strategy is that Climate Change is only briefly mentioned once in the document. For a 20-year plan we feel that not enough attention is being placed on the threat climate change will have on biosecurity. The number of new pests arriving and establishing in New Zealand, with then potential to spread to the Chatham's, is likely to increase. A number of pests currently established in New Zealand may also be able to survive in the Chatham's as the impacts of climate change strengthen. The strategy needs to plan ahead for a strong biosecurity framework moving ahead. The current level of resourcing may not be appropriate as climate change impacts start to be felt. The Taiko Trust feel that this point needs to be better incorporated into the strategy, ensuring that capacity and resilience is built into the plan moving forward. The pests of tomorrow, are not the same as the pest we are facing today, a changing climate will mean we face a wide range of emerging threats. This must be taken into consideration.	Climate change needs to be mentioned more strongly in Strategy.	The language around climate change has been strengthened in sections 2.5.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
42	Proposal	Taiko Trust, Mike Bell	The Taiko Trust support the development of the RPMP, protecting and enhancing our biodiversity rely on good pest management, and all agencies playing their part.	Supportive of development of the Proposal	No action required.
43	Proposal	Taiko Trust, Mike Bell	The Taiko Trust support the list of organisms listed as pests. We feel that all rabbits should be listed as pests, not just feral rabbits. Preventing pet rabbits, which could then become feral, is also important. Rabbits would have significant ecological and economic impacts, and as such even pet rabbits should be banned from the Chathams.	Supportive of list of organisms listed as pests. All rabbits should be listed, not just feral rabbits.	“Feral rabbits” has been amended to “rabbits” on the Exclusion list, to prevent domestic rabbits being kept as pets on the islands.
44	Proposal	Taiko Trust, Mike Bell	Under the unwanted organisms section, we feel that this section should specifically list stoats, weasels and ferrets, as it is under this legislation the prevents there organisms being allowed to be brought to the Chatham’s. As these pests are not hitchhiker pests and it would need to be a deliberate introduction, we feel that RPMP should more clearly outline the illegal nature of bringing mustelids to the Chatham’s. The arrival of mustelids on the Chatham’s will have devastating impacts on our endemic wildlife, and as such we feel this should be better outlines in the RPMP.	Specify that stoats, weasels and ferrets are Unwanted Organisms and are therefore prevented from being brought to the Chathams.	Mustelids have been added to the Exclusion list in the Plan.
45	Proposal	Taiko Trust, Mike Bell	As stated above in comments on the Biosecurity Strategy, a number of commercial grown tree species in NZ, which are not yet established in the Chatham’s (i.e Contorta Pine and Douglas Fur) should also be included in the exclusion list. Again, with Billion Trees initiative potentially adding risk species to the mix, a stronger line preventing planting of some commercial species may be required in the Chatham’s.	Include commercially grown, high spread-risk tree species that are not yet established on Chathams (incl. Pinus contorta and Douglas fir) as exclusion pests	All new exotic species for commercial forestry (bishops pine, contorta (lodgepole pine), Corsican pine, Douglas fir, larch, maritime pine, mountain pine and dwarf mountain pine, ponderosa pine, radiata pine and scots pine) have been added to the list of “organisms of interest” in the Plan, to highlight that they could pose a potential issue in the future. However, it is considered

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					that there is currently a low risk of these species coming to the islands and becoming established. This can be reviewed as and when more information becomes available.  Pinus contorta is designated an “Unwanted Organism” by MPI and therefore its movement is already restricted.
46	Proposal	Taiko Trust, Mike Bell	Highlighting exclusion of pest from Pitt Island, which are absent but established on Main Chatham is also very important, and we support this approach.	Supportive of exclusion pests from Pitt Island	No action required.
47	Proposal	Taiko Trust, Mike Bell	The Taiko Trust support the pests listed for eradication and for progressive control.	Supportive of pests listed for eradication and progressive control	No action required.
48	Proposal	Taiko Trust, Mike Bell	Our final comment is in relation to currently established ecological predators. The Taiko Trust feel that more emphasis on the potential of a predator free Chatham’s should be highlighted more strongly in the RPMP. Potentially listing feral cats, possum and rats as eradication, or progressive control pests should be considered. This would tie in with current predator free initiatives being discussed on the island, and provide some legislative framework to help move this forward.	Include feral cats, possums and rats as pests to align with Predator Free 2050 programme	CIC supports alignment with Predator Free programmes. As the PF2050 programme is still in its early development phase, it is currently too early to fully understand what provisions the Plan may need to provide in support. As the PF2050 programme develops, we will have a greater understanding of what needs to be done, what role CIC will play, and what objectives the Plan would seek to achieve. The Council may wish to review the Plan in a few years, once the PF2050 programme has been established. Feral cat, possum and rat control can be considered at this time. Section 7.4 of the proposed Plan notes that the Council can review the Plan to align objectives with other pest management programmes (e.g. Predator Free 2050).

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49	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Plan is playing safe, missed opportunity for a brave approach and doesn't reflect community aspirations – e.g. exclusion zones, by-laws, predator free initiative. The actions in the Strategy are not Chathams specific	Can exclusion zones be included? Are by-laws an option? Make actions more Chathams specific and reflect community aspirations, e.g. Predator Free.	<p>Exclusion zones and by-laws are specific tools that, when used, need to form part of a programme to achieve a specific outcome.</p> <p>The Strategy outlines the role of Chatham Islands Council in Chatham Islands biosecurity. It has been developed to work within the operational capabilities and budget of Council. The actions in the Strategy are designed to be specific to the pest management needs of the Chatham Islands, but they are described at a high level and don't delve down into pest specific detail. This allows the biosecurity programme to respond to a broad range of pests and prevents the actions being restrictive and bound to specific pests.</p> <p>Note that the Strategy includes actions around supporting the community on community-initiated projects.</p> <p>CIC supports alignment with Predator Free programmes. As the PF2050 programme is still in its early development phase, it is currently too early to fully understand what provisions the Plan may need to provide in support. As the PF2050 programme develops, we will have a greater understanding of what needs to be done, what role CIC will play, and what objectives the Plan would seek to achieve. The Council may wish to review the Plan in a few years, once the PF2050 programme has been</p>

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					established. Feral cat, possum and rat control can be considered at this time.
50	Proposal	Chatham Islands Conservation board, Judy Kamo	<p>Exclusion pests: Need greater clarity around what we already have on the islands versus what we need to safeguard against. Clarify why some NZ pests are included on Exclusion list and others not. If an organism is not listed on the Exclusion list this implies that it is ok to bring it in. Outline why each pest is a problem on the island and match this to your goals, to aid understanding of the consequences of bringing it to the island/planting in their garden etc.</p>	<p>Clarify which pests listed in Exclusion programme are present on the islands and which are not.</p> <p>Explain reasoning behind including certain pests present in NZ on the exclusion list and not others.</p> <p>Provide more Chatham Islands specific information of the adverse effects caused/threatened by each species.</p>	<p>The Exclusion Programme is designed to prevent the establishment of new pest organisms that are present in New Zealand but not yet established in an area. There are two parts to the Exclusion list: (A) pests that are not yet present within the Chatham Islands Territory, and (B) pests that are present on Chatham Island but have not yet reached Pitt Island. Pests named in this programme are deemed a high risk for introduction, either accidentally or deliberately.</p> <p>The exclusion pest list is not exhaustive. The pests that are considered most high-risk to the Chatham Islands have been included in the exclusion list. It would be unreasonable to include every pest that could pose some risk to Chatham Islands values.</p> <p>Potential adverse effects of each pest are outlined in the appendix as required by the Biosecurity Act and NPD.</p>
51	Proposal	Chatham Islands Conservation board, Judy Kamo	Add possums and hedgehogs to Eradication Programme.	Add possums and hedgehogs to Eradication Programme	Hedgehogs and possums are at too high numbers on Chatham Island to aim for eradication at this time. The Plan is particularly targeting high-risk, low incidence organisms that can realistically be eradicated now. Pest control for other harmful organisms can still be undertaken (by anyone) if it is not named in the Plan.

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					Hedgehog and possum are listed on the Exclusion list for Pitt Island, to prevent their establishment there.
52	Proposal	Chatham Islands Conservation board, Judy Kamo	Add frogs to Eradication Programme. This is an aspirational goal. We acknowledge that achieving this is difficult as we currently lack the management tools, but they need to be named somewhere so they don't fall between the cracks.	Add invasive frogs to Eradication Programme	<p>Invasive frogs have been included to the list of "organisms of interest" in the Plan, to acknowledge they are an issue we need to keep an eye on.</p> <p>There are no existing methods for efficient and effective control of invasive frogs, so at present the ability to respond is limited. The old Pest Management Strategy (PMS) was able to list a lot more pests than this Plan, as listed pests didn't require active management, and the majority of pests were included under a "surveillance" category. The new requirements for the Plan mean every pest listed must have an objective and achievable management plan in place.</p> <p>The Strategy highlights that where we lack the knowledge to manage a species successfully, there needs to be work undertaken to try to fill these knowledge gaps, likely through partnerships with others (such as DOC or science providers). CIC will keep abreast of any new developments in control methods that could help to control frogs in the future.</p>
53	Proposal	Chatham Islands Conservation	Add black swans to Eradication Programme.	Add black swans to Eradication Programme	Management of black swans sits more appropriately outside the Plan, under the Strategy. CIC is already actively involved in

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		board, Judy Kamo			regular culls, in partnership with the community and gun club, and don't need powers under the Biosecurity Act to do this work. CIC will step up coordinated culls in response to community feedback.
54	Proposal	Chatham Islands Conservation board, Judy Kamo	Add black backed gulls to Eradication Programme.	Add black backed gulls to Eradication Programme	<p>Black-backed gulls have been included as an "organism of interest in the Plan". This organisms does not needs to be designated as a pest unless powers or rules under the Act are needed to aid its control.</p> <p>Pest control can be undertaken when the population has got out of balance in an area and a knock-back is required to protect biodiversity. Work will be done on sites where it is necessary, and the budget permits.</p>
55	Proposal	Chatham Islands Conservation board, Judy Kamo	Add mice to Eradication Programme. This is an aspirational goal. We acknowledge that achieving this is difficult as we currently lack the management tools, but they need to be named somewhere so they don't fall between the cracks. Their absence in plan implies they are not a problem.	Add mice to Eradication Programme	<p>Mice have been added to the list of "organism of interest".</p> <p>Mice are an issue, although difficult to control effectively. This means that an achievable objective cannot be assigned in the Plan at this time. Further work needs to be undertaken with the community and other agencies to identify how to effectively control mice.</p>
56	Proposal	Chatham Islands Conservation board, Judy Kamo	Feral animals are a major issue as they cause massive damage to native biodiversity, yet they are relatively straightforward to manage: Feral stock (horse, sheep, cattle) Feral cats Feral emu	Add feral horses, sheep, cattle, cats and emu to Pest Programmes.	<p>Feral cattle, sheep and horses have been included in the Plan as "organisms of interest".</p> <p>Work will be done on sites where there is support from the community, and the</p>

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					<p>budget permits. Landowners are also encouraged to carry out their own control on their own land, should they wish to.</p> <p>Feral stock animals don't need to be included in the Plan for this work to be done, and their management is better suited to being undertaken outside the Plan. This provides a more community-focussed approach, greater flexibility and helps to deal with challenges, such as identification of feral versus domestic stock, and landowners who are not supportive of control on or near their land.</p> <p>Feral cats have been included in the Plan as an "organism of interest".</p> <p>Feral cat control will remain outside Plan and managed under the Strategy at this time. The domestic cat de-sexing programme will continue with the addition of compulsory micro-chipping.</p> <p>When the Predator Free programme is underway, the Plan may be reviewed to align objectives, and feral cats may be considered for inclusion at this time.</p> <p>Management of feral emu sits more appropriately outside the Plan, under the Strategy. We are already actively managing feral emu, and don't need powers under the Biosecurity Act to do this work. CIC will step</p>

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					up this work in response to community feedback, within budget constraints.
57	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Lifespan of documents is 20 years with review after 10 years. There needs to be provision/commitment to more frequent/regular reviews (every 5 years) plus the ability to make updates to pest information online (easily accessible technology to allow instant updates e.g. i-naturalist).	Add 5 yearly reviews. Set up online platform for updating pest information (e.g. pest locations)	<p>A ten-year minimum review period has been included in accordance with the Biosecurity Act. Section 1.4 of the Proposal states that “It is proposed to remain in force for a period of 20 years, with a full review taking place after 10 years, or prior if Council considers it necessary”.</p> <p>CIC can therefore opt to undertake a review before 10 years has passed, should circumstances change (such as to align with Predator Free objectives).</p> <p>The standard review period is 10 years, rather than a shorter period (e.g. 5 years), to reflect the cost and administration effort required to undertake a full review.</p> <p>We don’t currently have a system for updating pest information online. New information on pests can be provided to CIC biosecurity staff.</p>
58	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Need to recognize and respect the interest groups already doing this work (e.g. farmers, fishers, bee keepers etc.). Outside of the public consultation process, we would like greater engagement in general, e.g. regular workshops/meetings, to pass on local specialized knowledge.	Greater active engagement with the community.	CIC are committed to inclusivity and active engagement with the community. The biosecurity team encourage members of the community to get in touch should they have any ideas or concerns they would like to raise and discuss. CIC acknowledges the local expertise available in the community and the value it can add to the biosecurity programme.

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					<p>The biosecurity team will commit to a member of the biosecurity team being present at Conservation Board meetings to provide the opportunity to share updates, ideas and concerns. Following the initiation of the Plan, annual operational plans and reports will also be developed, which will raise awareness of what work is underway and upcoming.</p> <p>The Strategy's principles reflect these intentions, stating that we need to work with the community and maintain strong. Additionally, Figure 3 (section 3.3) outlines the need for community and to be responsive to community ideas and opportunities.</p> <p>The text in the Principles section has been amended to emphasise inclusivity and active engagement.</p>
59	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Pathogens – how do we deal with them? There are potential gateways for spreading diseases through importing dangerous goods – no control in ports or by airline. Currently relying on voluntary compliance and good will. Inconsistency in rules around moving between two islands.	Greater border controls with regards to preventing the spread of pathogens. Also need rules around transport between islands.	<p>The Strategy discusses the importance of an effective border biosecurity programme.</p> <p>CIC has an active border biosecurity programme in place to manage pathways onto and around the islands. This is a key part of CIC's biosecurity programme, with one third of its biosecurity budget is currently spent on this. As part of this, contractor SPS Biosecurity puts considerable effort into biosecurity measures in mainland NZ ports, to prevent new organisms finding their way to the islands.</p>

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					However, further investigation is required to understand if a hard border can be put in place on the islands and who's responsibility it would be to operate it. CIC will increase efforts to raise awareness of biosecurity needs to visitors to the islands, as well as the community (e.g. information provided at airport).
60	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Keen for alignment between CMS and CIC Strategy and RPMP to gain consistency across the board. The CMS currently needs to be reviewed. Likely to begin in 2021.	Keen for alignment between CMS and Strategy and Proposal.	We are supportive of seeking alignment between Council Strategy and the CMS once the CMS review has been completed.
61	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	Need to strengthen the wording around the need to protect the bee industry from bee diseases.	Need stronger wording around the need to protect the bee industry from bee diseases.	The Strategy text has been amended to add mention of the bee industry and the risk posed by bee diseases.  There is Plan rule with regards to importing goods and equipment, including bee products. Varroa bee mite and American foulbrood are also included in the Proposal as exclusion pests.
62	Proposal/Strategy	Chatham Islands Conservation board, Judy Kamo	In general, the plan is hard to follow and read.	The Plan is hard to follow and read.	The Proposal is a statutory document and legally must contain certain information, and a standard template has been used to align with other Regional Council Pest Management Plans.
63	Strategy	DOC, Tryphena Cracknell	Section 2.4.2 The Department submits that 'we' do have a good understanding of the impact and distribution of some of the listed species, in particular pampas and feral cats, and that these should be included as	Include pampas and feral cats as pests.	Pampas has been included in the Plan as an "organism of interest". It is not currently viewed as a priority, high-risk organism for control and no information has been provided on its distribution or impact.

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			pests as per our submission regarding the proposed RPMP.		<p>However, we will monitor this species to gather more information.</p> <p>Feral cats will be included in the Plan as an “organism of interest”. Feral cat control will remain outside Plan and managed under the Strategy at this time. The domestic cat de-sexing programme will continue with the addition of compulsory micro-chipping.</p> <p>When the Predator Free programme is underway, the Plan may be reviewed to align objectives, and feral cats may be considered for inclusion at this time.</p>
64	Strategy	DOC, Tryphena Cracknell	<p>Section 5. Border security: The Department requests clarity around the point “Exclude terrestrial pests by checking - Personal belongings (e.g. luggage, tramping, hunting, camping equipment)”. How does the CIC propose to realistically implement this for people traveling to the Chatham Islands? Share knowledge: The Department requests that we are included in the list to “Work with” in at least the Terrestrial and Freshwater spaces. As requested in the proposed RPMP submission, we require prompt notification of any actual or suspected incursion to or within the Chatham Islands; and we are also more than happy to share our technical knowledge and work with CIC to develop species management strategies and build knowledge of species and issues. Share knowledge/Support the community: The Department requests that the CIC provides further information on pests to the community at large, specifically on</p>	<p>Provide clarity on how CIC will check personal belongings at the border, otherwise remove this action point.</p> <p>Include DOC in the “Work with” lists in at least the Terrestrial and Freshwater spaces.</p> <p>EITHER include text indicating that CIC will take action to directly inform the community on pest plants OR indicate to the Department that this will be undertaken under a separate strategy.</p>	<p>The text has been amended to clarify that we will not be checking personal belongings. The border biosecurity programme will continue to check goods, used equipment, vehicles and machinery prior to transport to the Chatham Islands.</p> <p>The text states that CIC will work with other agencies and organisations rather than individually naming them all. It is the biosecurity team’s intention to work with DOC on these actions. We are supportive of maintaining good channels of communication between CIC and DOC and working together to achieve our common objectives.</p> <p>The Strategy highlights the need for more education and advocacy with the community to raise awareness of biosecurity risks. This includes informing the public</p>

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			what organisms are classed as pests, what category they are each in and what that means for the public.		about which organisms have been designated as “pests” and providing information on the relevant restrictions in place. The text has been amended to specify this.
65	Proposal	DOC, Tryphena Cracknell	<p>Part One (Pages 2-14) is supported in part. 1.2 describes the result of managing specified organisms efficiently and effectively in the Chatham Islands Territory. No overall purpose is described. In the previous 2008-2018 strategy the purpose of the plan was to, "Protect the regional values of the Chatham Island."</p> <p>3.3.1 (or other section as appropriate): the Department would like to formalise a need for CIC to inform the Department of an incursion of any new organism to or within the Chatham Islands as soon as is practicable. The Department is responsible for managing many threatened species and ecosystems within the islands and requires prompt notification of incursions to enable good management.</p> <p>3.3.2 The outdated terminology used here regarding the Department’s structure needs updating.</p>	<p>1.2 Include a new overall purpose or use the one from the previous 2008 - 18 strategy. Describe the regional values that the plan is protecting as mentioned in section 1.2 - region’s economic, environmental, social, and cultural values.</p> <p>3.3.1 (or other section as appropriate): add the commitment to report new incursions to or within the Chatham Islands to the Department.</p> <p>3.3.2 change “Wellington Conservancy” to “Lower North Island Region” and “Chatham Islands Area Office” to “Rekohu/Wharekauri/Chatham Islands’ District Office”</p>	<p>The Plan purpose has been written in accordance with the standard Regional Council template, used by all regional councils across New Zealand. CIC don’t feel it is necessary to deviate from this template.</p> <p>CIC are open to a formal arrangement around reporting of new incursions to DOC. The biosecurity team already do this and have worked with DOC in the past to tackle incursions.</p> <p>DOC terminology has been updated.</p>
66	Proposal	DOC, Tryphena Cracknell	<p>Part Two (Pages 15 -41) is supported in part as detailed in the specific items below.</p> <p>The inclusion of the listed Organisms Classified as Pests is supported in part. It is noted that the species list is much reduced from the list that was included in the 2007 RPMS and these species are not included in the proposed 2020 RPMP. The</p>	<p>Reconsider the inclusion of boxthorn, brush wattle, coastal wattle, yellow flag iris, tradescantia, pampas, brush and coastal wattle, all cotoneaster species and male fern reinstated</p>	<p>Boxthorn, brush wattle, coastal wattle, yellow flag iris, tradescantia, pampas, brush and coastal wattle, all cotoneaster species and male fern have been added as “organisms of interest” in the Plan.</p> <p>These species need further monitoring and investigation as further information has not</p>

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			<p>Department would like boxthorn, brush wattle, coastal wattle, yellow flag iris, tradescantia, pamapas, boxthorn, brush and coastal wattle all cotoneaster species and male fern reinstated. The Department considers that their omission may reduce the ability to manage these species effectively in the future.</p> <p>The Department submits that common wasps and Darwin’s ants should be included in this list, in the Exclusion programme, due to their potential impacts and detections methods being almost identical to those listed already (ie German wasps and Argentine ants). The Department also questions whether paper wasp species should be included as pest species.</p> <p>The Department submits that German wasps should be in the Eradication programme until such time as we can be sure that there are no further German wasps on Chatham Island. Surveillance in 20/21 will prove this, but to date all we have is successful control of the nest that has been found.</p> <p>Feral cats, rats, mice, possums, feral pigs, hedgehogs, mustelids and deer species should all be included as pests in the strategy as they all have impacts on the economic, social and environmental values on the Chatham Islands.</p> <p>The Department would like to see a site-led category developed for species such as mice, feral pigs and hedgehogs to enable the control of these pests where high value biodiversity values requires protection.</p>		<p>been provided and CIC don’t currently know enough about their density and distribution to confidently add these species to a management programme under the Plan. Please can DOC share any information they have on these species, with regards to their distribution and impact on the Chatham Islands.</p> <p>Site-specific weed programmes can be undertaken outside of the Plan, under the Strategy, as the budget permits, and we encourage partnership with DOC to undertake this work.</p>
				<p>Include common wasps and Darwin’s ants under the exclusion category.</p>	<p>“German wasps” has been amended to “Wasps” on the Exclusion list to encompass common wasps.</p> <p>“Argentine ants” has been amended to “Ants” on the Exclusion list to encompass Darwin’s ants.</p>
				<p>Include feral cats, rats and possums under the sustained control category.</p>	<p>Feral cats will be included in the Plan as an “organism of interest”. Feral cat control will remain outside Plan and managed under the Strategy at this time. The domestic cat de-sexing programme will continue with the addition of compulsory micro-chipping.</p> <p>When the Predator Free programme is underway, the Plan may be reviewed to align objectives, and feral cats may be considered for inclusion at this time.</p>

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			<p>Although the Chatham Islands endemic flora does not include many Myrtaceae species, an incursion of this rust could have negative environmental impacts on these limited endemic species plus an economic impact through harming introduced species including Eucalyptus species. Given the current proposals to create large-scale Eucalyptus plantations, the Department submits that myrtle rust should be listed as a pest and included in the Exclusion programme.</p> <p>1.2 states that only where individual action or inaction in managing pests imposes undue effects on others is regional management needed. The implication of this is collaboration will become more complicated if the above species are not included in the plan as pests.</p> <p>Part 5 mentions that a harmful organism is assigned pest status if included in a pest management plan – this implies that the species mentioned above are not currently considered pests on the Chatham Islands. Possums, rats and hedgehogs only are exclusion only from Pitt.</p> <p>The department cannot effectively carry out its responsibilities to protect the values on PCL if the species being targeted are not considered pests and there is no mandate to support through control in the surrounding lands. As mentioned, some</p>		<p>CIC support alignment with Predator Free programmes. As the Chathams PF2050 programme is still in its early development phase, it is currently too early to fully understand what role CIC will play and what provisions the Plan may need to provide in support. As the PF2050 programme develops, we will have a greater understanding of what needs to be done and what objectives the Plan would seek to achieve. The Plan may be reviewed in a few years, once the PF2050 programme has been established. Section 7.4 of the proposed Plan outlines that the Council can review the Plan at any time to align objectives with other pest management programmes (e.g. Predator Free 2050).</p>
				<p>A policy around what new pet and/or stock species are permitted on the Chatham Islands may be required - this may name certain species that will not be allowed on the island, or it may formalise a blanket rule that no further animal species will be allowed on the island for example.</p>	<p>The Biosecurity Act does not provide for controls on pet and stock species unless the species are declared as pests. There is already an informal process in place for the general public to notify CIC to request permission to import a new species, and each application is considered on a case by case basis. Formalising this process will be considered.</p>

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			<p>reserves are several ha in size and suffer from constant reinvasion</p> <p>Given the recent decision of CIC not to allow a pet leopard gecko on the Chatham Islands, the Department suggests that a policy to this effect be included in the RPMP document.</p>	<p>Site-led programmes for mice, feral pigs and hedgehogs where there are high biodiversity values to protect.</p>	<p>We are supportive of site-led projects to protect sites with high biodiversity values, as the budget permits. We encourage the community to take an active role in initiating and supporting site-led projects.</p> <p>However, site-led projects do not need to be included in the Plan unless regulatory powers or rules are required. This work currently sits more appropriately outside of the Plan, under the Strategy, and CIC are happy to discuss any proposed sites or projects with DOC.</p>
				<p>Add Myrtle rust as exclusion pest</p>	<p>Myrtle rust has been included as an “organism of interest” in the Plan, which means we will monitor for its arrival.</p> <p>Myrtle rust was considered for inclusion, but there is no management tool for this and no way to prevent its arrival (being windborne). Instead, it is included this as an “Organism of interest”, which means that the biosecurity team will monitor for its presence.</p> <p>Myrtle rust is designated by MPI an “Unwanted Organism” under the Biosecurity Act, which provides restrictions intended to restrict its spread.</p>

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				<p>If a harmful organism is not included in a pest management plan it is not considered a “pest”. The Department cannot carry out their responsibilities if targeted species aren’t considered pests and there’s no mandate to support control in surrounding land.</p>	<p>Our limited budget means that we cannot declare everything a “pest”, as all pests named in the Plan require active management to achieve a defined objective. However, control of problem organisms can still be undertaken outside of the Plan as the budget permits. It is considered that DOC can still carry out its responsibilities on public land regardless of organism designations in the pest management strategy.</p> <p>We are supportive of working in partnership with DOC to achieve our common outcomes and encourage discussion around how we can support each other’s actions.</p>
67	Proposal	DOC, Tryphena Cracknell	<p>Table 3 – Exclusion pests The inclusion of the listed Organisms Classified as Exclusion is supported in part. The Department proposes that common wasps, Darwin’s ants, sea spurge ((Euphorbia paralis), Spartina sp , Spanish heath (Erica lusitanica) and heather (Calluna vulgaris) are included as exclusion organism’s .</p>	<p>Add Sea spurge, spartina, Spanish heath and heather to Exclusion Programme</p>	<p>Sea spurge, spartina, Spanish heath and heather have been added to the Proposal as “organisms of interest”. As no further information has been provided, these organisms cannot be included in the exclusion programme. CIC will need confirmation that they are not already present on the islands and to understanding the potential risk of these organisms arriving on the islands.</p> <p>The border biosecurity programme monitors goods, equipment, vehicles and machinery for any organisms that are not understood to be on the Chatham Islands. It is likely that these organisms would be detected regardless of their inclusion in the Plan.</p>

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
68	Proposal	DOC, Tryphena Cracknell	Table 4 – Eradication pests The Pests to be managed in the eradication programme is supported in part It is noted that the species list is much reduced from the list that was included in the 2007 RPMS (Total Control). The Department would like buddleia reinstated from Progressive Containment to Eradication.	Add buddleia to Eradication Programme	Buddleia will remain in the Progressive Containment Programme. The distribution of this weed is at too high a level to aim for eradication at this time. The Eradication programme in the Plan is particularly targeting high-risk, low incidence organisms that can realistically be eradicated in the short-term.
69	Proposal	DOC, Tryphena Cracknell	Table 5 – Progressive containment pests The pests to be managed in the progressive containment programme is supported in part. The Department would like African club moss moved to eradication. This plant has limited distribution (3 sites) and including it as an eradication plant allows the Department to effectively control this plant with support from CIC on private property.	Add African club moss to Eradication Programme	African club moss will remain in the Progressive Containment Programme. We will endeavour to eradicate this at all known sites, but we do not know enough about its distribution to confidently assign an Eradication objective at this time.  Please can DOC provide us with confirmation of the 3 sites where they have identified African club moss.
70	Proposal	DOC, Tryphena Cracknell	Table 6 – Sustained Control pests There are a number of additional species that the Department proposes be included as Organisms Classified as Pests and managed under Sustained Control). Inclusion would mean that occupiers would in theory have to control these species, but the Department understands that the rule would only be enforced where there is a control programme in the vicinity and the presence of the target weed on nearby land is adversely affecting that control programme. The Department understands that this would be the situation for all species proposed under Sustained Control Programmes- i.e. there would be no enforcement of the rule unless the presence of the weed is causing an issue.	Add to Sustained Control Programme.: <ul style="list-style-type: none"> <li>• Tradescantia</li> <li>• Yellow flag iris</li> <li>• Pampas</li> <li>• Veldt grass</li> <li>• Wildings from established Macrocarpa, Pinus radiata plantations and shelter belts</li> </ul>	Tradescantia, yellow flag iris, pampas and veldt grass have all been added to the Plan as “organisms of interest”. Further investigation is required as no further information has been provided and CIC don’t currently know enough about their density and distribution to confidently assign a management objective under the Plan.  Please can DOC share any information they have on these species, with regards to their distribution and impact. Rules are not required to manage wilding conifers. To our knowledge, spread is small-scale and limited

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
					and does not require CIC intervention at this stage.
71	Proposal	DOC, Tryphena Cracknell	Section 5.4 The Department seeks further information on this section and how it may formalise a closer working relationship with CIC, in our common goal of reducing pests on the Chatham Islands.	EITHER include text here regarding opportunities for DOC to work more closely with CIC on pest management issues OR a formal agreement to this effect outside of the Proposal process.	CIC are keen to have a closer relationship with DOC, where there are synergies and common goals (e.g. pathway management) and encourage further discussion on this.
72	Proposal	DOC, Tryphena Cracknell	<p>The Department supports the CIC controlling Chilean guava.</p> <p>The Department also submit that a more detailed analysis of the costs and benefits of good neighbour rules for gorse is necessary. In particular further analysis is needed of factors such as seed longevity in the soil (to help inform whether control of weeds a few metres over a nearby boundary will significantly reduce seedling recruitment and resulting impact of the target weed on the neighbour), and seed dispersal distances (to help inform whether the selected boundary control distances are appropriate and will be effective in reducing the impact of the target weed on the neighbour).</p> <p>The Department seeks that more detailed analysis of the costs and benefits of Sustained Control good neighbour rules for gorse are undertaken including but not limited to:</p> <ul style="list-style-type: none"> <li>• Further analysis of factors such as seed longevity in the soil (to help inform whether control of weeds a few metres over a nearby boundary will significantly reduce seedling</li> </ul>	<p>More detailed CBA of GNR for gorse, considering factors such as:</p> <ul style="list-style-type: none"> <li>• Seed longevity in the soil</li> <li>• Seed dispersal distances and vectors</li> <li>• Comparisons of costs imposed/reduced...</li> </ul>	<p>A CBA for the gorse GNR has been undertaken</p> <p>using the model developed for the Regional Councils Biosecurity Working Group. The model provides a tabular output describing the boundary distance required before the benefits outweigh the costs, and the relationship between the costs for the source and receptor land holders. The model accounts for the behaviour of gorse seed dispersal and longevity.</p> <p>This CBA has been provided to DOC.</p>

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
			<p>recruitment and resulting impact of the target weed on the neighbour).</p> <ul style="list-style-type: none"> <li>• Further analysis of seed dispersal distances and vectors (to help inform whether the selected boundary control distances are appropriate and will be effective in reducing the impact of the target weed on the neighbour).</li> <li>• Consideration of likely reduction in weed control cost to a complainant neighbour resulting from and compared to the likely control cost imposed on the infested neighbour (exacerbator). This should include an analysis of whether the potentially high cost of control to the infested neighbour (exacerbator) is justified in light of the potentially low cost to the complainant neighbour of continuing to keep their land clear. It should also be considered that a good neighbour rule will not prevent all invasion and recruitment and therefore the complainant neighbour is likely to have some level of ongoing control costs regardless of the existence and enforcement of a good neighbour rule.</li> </ul> <p>Analysis of these factors is necessary to ensure that the benefits of the rules are sufficient to justify the costs.</p>		
73	Proposal	DOC, Tryphena Cracknell	<p>Section 7 - Monitoring: This section is supported in part. 7.1 The Department considers that 2 checks per year are not sufficient to give confidence that rats in particular have not been introduced to Pitt Island, particularly considering the presence of a rat-detection dog on Chatham Island. The</p>	Commit to checking Pitt Island for rats a minimum of 4 times per year.	Text has been amended to specify that checks will be undertaken on Pitt Island a minimum of 4 times a year.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
			Department would consider a minimum of 4 checks per year to be adequate.		CIC encourages a partnership with DOC to achieve this as shared use of the rat-detection dog benefits both organisations.
74	Proposal	DOC, Tryphena Cracknell	Part three – procedures Part 3 (pages 35 -47) is supported in part. 9.3.2 The Department considers that this section draws unnecessary negative connotations to the use of these toxins which may end up with them not being able to be used in the future.	Consider removing the paragraph referring to 1080 etc, and focusing on the positive impacts that pest control will have on the environment.	The text has been amended to remove the reference to 1080 and make the statement more general.  The Act requires CIC to identify detrimental effects as well as positive effects.
75	Proposal	DOC, Tryphena Cracknell	Organisms not included in the Strategy: It is noted that this section that was included in the 2007 RPMS is not included in the proposed 2020 RPMP the Department suggest that Chatham Islands Council maintain a list of Organisms of Interest. Organisms of Interest are not accorded pest status but future control of them could arise. A review of the CIProposal may be necessary to include them as pests if any rules are necessary that require an owner and/or occupier to act.	Include the species as listed above and consider the inclusion of the weed species listed in the 2007 RPMS which are not included in this plan.	An “organisms of interest” section has been added to the Plan. This is not intended to be an exhaustive list but highlights some organisms that pose a potential risk and may require control on the future. This includes organisms that need further surveillance to determine their density and distribution on the island, organisms that we are monitoring to determine if they may become a problem in the future, and organisms that we know are an issue but currently lack management methods.
76	Proposal	DOC, Tryphena Cracknell	The Department would also like the Chatham Islands Council to include the plant Coprosma repens in the Plan. This species while native to parts of New Zealand is not native to the Chatham Islands and is spreading. It is invasive as it forms dense and impenetrable stands that shade out vegetation preventing the growth of ground flora and regeneration of indigenous trees. This shrub is tolerant of salt spray and vigorously re-sprouts after damage. Branches touching the ground easily become rooted. If the council do not feel able to add this plant	Ban the propagation, sale and planting of Coprosma repens on the Chatham Island group.	We do not know enough about the distribution of Coprosma repens on the Chatham Islands to assign it to a management programme under the Plan and no further information has been provided.  To enact restrictions under section 52 and 53 of the Biosecurity Act, coprosma would need to be designated a pest in the Plan.  Please can DOC provide further information.

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
			to the plan the Department would ask that the Council ban the propagation, sale and planting of this species on the Chatham Island group.		
77	Proposal	DOC, Tryphena Cracknell	<p>Appendix 2</p> <p>Exclusion: Argentine ant. Pathway risk is very brief and does not mention the risk associated with the nursery industry. Given the recent boom in “micro-nurseries” in the Chatham Islands, the Department requests that this risk be noted in the RPMP.</p> <p>Exclusion: German wasp. The final paragraph suggests 1 wasp was found near the wharf, rather than a wasp nest.</p> <p>Exclusion: Plague skink. Pathway risk is very brief and does not mention the risk associated with the nursery industry. Given the recent boom in “micro-nurseries” in the Chatham Islands, the Department requests that this risk be noted in the RPMP.</p> <p>Progressive containment: African club moss. The distribution of this plant is out of date: this is known to be present at 3 sites, 2 of which are managed by the Department.</p>	<p>Argentine ant: Add a comment to reflect the risk within the nursery/gardening industry, specifically the importation and movement of potted plants, garden plants and potting mix.</p> <p>German wasp: Change the text “a wasp was discovered” to “a wasp nest was discovered”.</p> <p>Plague skink: Add a comment to reflect the risk within the nursery/gardening industry, specifically the importation and movement of potted plants, garden plants and potting mix.</p> <p>African club moss: Change the text “present at one location on Chatham Island” to “represent at three locations on Chatham Island”</p>	<p>The text has been amended to reflect these comments.</p> <p>Note that all pest maps have been updated since this draft was provided to DOC and now the most up to date knowledge is presented.</p>
78	Proposal	DOC, Tryphena Cracknell	<p>Site led programmes:</p> <p>The National Policy Direction for Pest Management, 2015, includes an additional intermediate outcome to those included in the draft RPMP: ‘<b>Protecting Values at Place</b>’.</p>	<p>Include a “site – led” section in the Proposal.</p>	<p>We are supportive of site-led projects to protect sites with high biodiversity values, as the budget permits. We encourage the community to take an active role in initiating and supporting site-led projects.</p>

Comment reference	Strategy/ Proposal	Consultee (group name, contact)	Full Comment	Key points from comment	Resolution
			<p>'(v) "protecting values in places" (if applicable) which means that an organism being spread by the subject, that is capable of causing damage to a place, is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place;'</p> <p>In our view this category could be usefully used to management plant species which are pests in some sites but not in others such as <i>Pinus radiata</i>, <i>Hedera helix</i>, and <i>Acanthus mollis</i>, and are widespread pest plants for which a site led pest programme is the most practical approach. This approach can be used to protect values at significant sites which are threatened by widespread pest plants which are impractical to manage under other intermediate outcomes such as eradication, and progressive containment and for which localized application of the good neighbor rules etc. might apply. The Department is happy to assist a review of pest species which could be managed under the 'Protecting Values at Place' – site led approach.</p>		<p>However, site-led projects do not need to be included in the Plan unless regulatory powers or rules are required. This work currently sits more appropriately outside of the Plan, under the Strategy, and CIC are happy to discuss any proposed sites or projects with DOC.</p>



## Appendix 2: Changes made to the Proposal to create the Plan

Plan Section	Change made
Throughout	Changed “Proposal” to “Plan”
Throughout	Changed “RPMP” to “Plan”
Throughout	Graphic design undertaken on figures and maps throughout the Plan
Throughout	Correction of typos and minor errors in text
Title	Title change (removed “Proposal for the”) and added date: 2021-2041
	Added Seal page
	Added Foreword
	Added in blank pages before and after the Seal page and Foreword page
Contents	Updated
1	Removed Proposal subsection “Proposal for the Chatham Islands Pest Management Plan”
1	<b>Purpose</b> – Changed sentence from “This Proposal identifies those organisms classified as pests to be managed through the RPMP” to : “This Plan identifies those organisms classified as pests that will be managed within the Chatham Islands Territory”.
1	Subsection Title “Coverage” changed to “Scope and Coverage”
1	<b>Scope and Coverage</b> – Added: “The framework set out in the Plan, which focuses on exclusion, eradication, progressive containment and sustained control programmes (for which rules apply), sits alongside the <i>Chatham Islands Council Biosecurity Strategy 2021-2041</i> . The Strategy provides a broader suite of non-regulatory tools and actions to address biosecurity on the islands and addresses other harmful organisms not covered by the Plan.”
1	Subsection title “Plan duration” changed to “Duration”
1	<b>Duration</b> – first sentence altered to: “The <del>RPMP</del> Plan will take effect on the date it <del>becomes operative</del> commences under section 77(5) <del>commences as a Regional Pest Management Plan under s77</del> of the Act. It will <del>is proposed to</del> remain in force for a period of 20 years...”
2	<b>Strategic background – Council’s biosecurity framework</b> - Changed Strategy date to 2021-2041

2	<b>Strategic background</b> - changed “RPMPs” to “Regional Pest Management Plans”
2	<b>Figure 2</b> – Changed “RPMP” to “Chatham Islands Pest Management Plan”
2	<b>Strategic background – Biosecurity Act – Part 2...</b> - altered sentence to: “Some of these activities include helping to develop and align <del>RPMPs</del> regional pest management plans and regional pathway management plans <del>in the region</del> ,...”
2	<b>Added subsection to provide an overview of the NPD</b>
2	<b>Relationship with other plans and regulations</b> – changed “An RPMP” to “A regional pest management plan”.
2	Removed Proposal subsection “Relationship with the National Policy Direction”
2	Removed Proposal table 1 – NPD requirements and steps taken to comply with them
2	Removed Proposal subsection “Consultation overview”
3	Removed paragraph: <i>Chatham Islands Council is satisfied that it meets the requirements of s100 of the Act in that it:</i>  <i>(a) is accountable to the Plan funders, including Crown agencies, through the requirements of the LGA 2002;</i> <i>(b) is acceptable to the funders and those persons subject to the Plan’s management provision because it implemented previous Regional Pest Management Strategies; and</i> <i>(c) has the capacity, competency and expertise to implement the Plan.</i>
3	<b>Affected parties – Responsibilities of owners and/or occupiers</b> – Changed text to: An authorised person may enter and inspect any place, at any reasonable time, to –  <ul style="list-style-type: none"> <li>• <del>find out</del> <u>confirm</u> whether pests are on the property;</li> <li>• <u>eradicate or</u> manage pests; or</li> <li>• <del>ensure</del> <u>determine whether</u> the owner and/or occupier is complying with biosecurity law.</li> </ul>
3	Added years to references to Acts in text: Resource Management Act 1991 Reserves Act 1977 National Parks Act 1980 Conservation Act 1987 Wild Animal Control Act 1977 Wildlife Act 1953
5	<b>Pest management framework - Objectives</b> – changed “NPD” to “National Policy Direction for Pest Management 2015 (NPD)”

4	<p><b>Table 1 - Organisms declared as pests</b> – changed table section titles to:</p> <p>“Animals <del>organisms</del> classified as pests”</p> <p>“Plants <del>organisms classed</del> <u>classified</u> as pests”</p> <p>“Pathogens <del>describes</del> <u>classified</u> as pests <del>organisms</del>”</p>
5	<p>Added subsection “<b>Community engagement</b>” and text: “Chatham Islands Council works with the community to deliver pest management outcomes. This may include seeking community advice on plan implementation to inform the operational local inspection requirements, information and service delivery needs and identification of new pest issues.”</p>
6	<p>Throughout section 6 - References to map showing area to be managed in the eradication programme for Chilean guava corrected from “<del>Map 4</del>” to “<u>Map 5</u>”.</p>
6	<p><b>Objectives and principal measures tables for each management programme</b> – removed “Alternatives considered” paragraph in each table</p>
6	<p><b>Objectives and principal measures to be used in the exclusion programme</b> – Slightly amended Plan Rule 1 wording to clarify intent.</p>
6	<p><b>Pests to be managed in the eradication programme</b> - “There are a number of pests present on the Chatham Islands where the infestation levels are low enough to make eradication possible within the <del>proposed</del> 20-year duration of the Plan.”</p>
6	<p>Slightly amended Plan Objectives 3 &amp; 4 wording to clarify intent. Inclusion of “...<u>reasonably</u> practicable...”</p>
6	<p><b>Objectives and principal measures to be used in the eradication programme</b> – Advice note: “There are no <del>proposed</del>-plan rules...”</p>
6	<p><b>Objectives and principal measures to be used in the progressive containment programme</b> – Advice note: “There are no <del>proposed</del>-plan rules...”</p>
6	<p><b>Pests to be managed in the sustained control programme</b> - “The sustained control programme will at least hold populations to current levels over the <del>proposed</del>-20-year duration of the Plan”.</p>
7	<p><b>Monitoring – Measuring achievement of the objectives</b> – added text: “Table 7 outlines how Chatham Islands Council will undertake monitoring to measure the extent to which the objectives of the Plan are met.”</p>
7	<p><b>Table 7 – Monitoring to be undertaken on specified pests</b> - Reference to map showing area to be managed in the eradication programme for Chilean guava corrected from “<del>Map 4</del>” to “<u>Map 5</u>”.</p>
9	<p>Section Title “Effects and funding analysis” changed to “Funding Analysis”</p>
9	<p>Removed Proposal subsection “Introduction”</p>
9	<p>Removed Proposal subsection “Analysis of benefits and costs”</p>

9	Removed Proposal table 10 – summary of proposed pests, management objectives and costs
9	Removed Proposal subsection “Consideration of effects
9	Removed Proposal subsection “Beneficiaries and exacerbators”
9	Removed Proposal table 11 – Beneficiaries and exacerbators
9	<p><b>Cost allocation and funding rationale</b> - Removed paragraph: <i>“In general, efficiency is best achieved by targeting costs to those closest to a particular work where those paying can act in respect of those works. If the person deciding has to pay for the results of their action or inaction, they may change their behaviour to minimise costs. Doing so would lead to the least-cost outcome for society. But if another person pays those costs, the incentive to change behaviour is minimal. This may lead to a higher cost for society. Efficiency includes close targeting of costs to benefits and to those contributing to the problem (exacerbators). Equity is difficult to establish, particularly if a “public good” component exists. In general, no relevant guidelines are available.”</i></p> <p>Removed sentence <i>“Those seeking funds should also target those funding the Plan and the costs of collecting funding.”</i></p> <p>Amended text: <i>“This funding arrangement is expected to continue for the duration of the next <u>this</u> Plan.”</i></p>
9	<b>Anticipated costs of implementing the plan</b> – removed all: “proposed”
Appendix 1	<b>Glossary of terms</b> – added to term: “Pest management plan and ‘the Plan’”
Appendix 1	<b>Glossary of terms</b> – for “Subject” removed the definition in relation to a Proposal
Tables	Renumbered after some Tables deleted, and updated all references to tables

# Appendix 3: Assessment of the Chatham Islands Pest Management Plan against the requirements of sections 73 and 74 of the Biosecurity Act 1993

## Background and purpose

Chatham Islands Council has prepared a Chatham Islands Pest Management Plan (“the Plan”) under the Biosecurity Act 1993 (“the Act”). Section 73 of the Act outlines matters that must be set out in the Plan. Section 74 outlines matters the Council must consider and be satisfied with when making the Plan and refers to requirements of the National Policy Direction (NPD).

This report provides an assessment of the Plan against the requirements of sections 73 and 74 of the Act. This includes assessment of its consistency with the NPD. The NPD sets requirements for both the Proposal and the Plan.

In December 2020, Council considered the Proposal for the Chatham Islands Pest Management Plan (“the Proposal”) alongside an accompanying assessment of the Proposal’s compliance with sections 70 and 71 of the Act. As part of this, an economic analysis of the Proposal was undertaken, including cost benefit analysis and consideration of various funding matters (in a similar manner to a section 32 report on a plan under the Resource Management Act). This economic analysis was undertaken by Carina Ltd and is outlined in their report “Cost Benefit Analysis to support the Proposed Chatham Islands Regional Pest Management Plan (December 2020)”. This report is referred to below as the “CBA Report”.

There is some repetition between the previous assessment of the Proposal against sections 70 and 71 of the Act and this assessment of the Plan against sections 73 and 74 of the Act. Some of the analysis required for this step requires reference back to the Proposal, particularly analysis associated with the NPD.

## Analysis undertaken

Results of the analysis undertaken against the requirements of sections 73 and 74 of the Act is shown in table format below (Tables 1, 2 and 3). Each table shows the relevant clauses of sections 73, 74 and the NPD, respectively. For each clause, a description is provided of how the requirements of the Act have been met including a reference to the relevant section of the Plan or CBA Reports. Where NPD requirements refer to the Proposal, a reference to the relevant section of the Proposal is provided. Where necessary, further commentary is given, including whether the Council can be satisfied with matters listed in the Act.

It is noted that there is considerable overlap and repetition within the requirements of sections 73, 74 and the NPD. Consequently, there is repetition in the resulting references and comments within the tables.

## Conclusion

The Chatham Islands Council must be satisfied that the Plan complies with sections 73 and 74 of the Act. This assessment concludes that the Plan together with the supporting economic analysis, complies with sections 73 and 74 of the Act and the NPD.

Table 1 – Section 73, Fourth Step: Approval of preparation of plan and decision on management agency

Section 73(3) of the Biosecurity Act 1993 provides that the Plan must set out the following matters:

Section of Act	Requirement	How it is met in the Plan <i>[Relevant section of the Plan with comment, where needed].</i>
<b>73(3)</b>	<b>Matters to be specified</b> <b>A plan must specify the following matters:</b>	
73(3)(a)	The pest or pests to be eradicated or managed:	Section 4.1 lists the organisms that are declared as pests.
73(3)(b)	The plan's objectives:	Section 6 outlines the objectives of the Plan.
73(3)(c)	The principal measures to be undertaken to achieve the objectives:	The principal measures to be used in the Plan are outlined in section 5.3 and measures to be used for each pest are outlined in Section 6. The principal measures described are broad as the choice of specific tools depends upon specific circumstances such as site characteristics and willingness of landowners to take action.
73(3)(d)	The means by which the achievement of the plan's objectives will be monitored or measured:	Section 7.1 provides details on how the Chatham Islands Council will undertake monitoring to measure the extent to which the objectives of the Plan are met.
73(3)(e)	The sources of funding for the implementation of the plan:	Section 9 outlines how the Plan will be funded.
73(3)(f)	The limitations, if any, on how the funds collected from those sources may be used to implement the plan:	No limitations are specified.
73(3)(g)	The powers in Part 6 to be used to implement the plan:	Section 8.1 outlines the powers to be used to implement the Plan.
73(3)(h)	The rules, if any:	All rules are contained and explained in Section 6.

73(3)(i)	The rules, if any, that are intended to be good neighbour rules:	Plan Rule 2 is intended to be good neighbour rule and is clearly identified in Section 6.  <i>Clause 8 of the NPD provides directions on good neighbour rules. An assessment against these directions has been undertaken in accordance with section 74 of the Act as set out in the table 3 below.</i>
73(3)(j)	The management agency:	Section 3.1 of the Plan states that Chatham Islands Council will be the management agency.
73(3)(k)	The actions that local authorities, local authorities of a specified class or description, or specified local authorities may take to implement the plan, including contributing towards the cost of implementation:	Section 5 (Pest Management framework) and Part Three (Procedures) of the Plan outline the actions that Chatham Islands Council, as the management agency, will undertake to implement the plan. This includes the monitoring and funding actions.  As Chatham Islands Council are the only local authority present in the Chatham Islands Territory, no other local authorities are required to act or are affected by implementation of the Plan.
73(3)(l)	The portions of road, if any, adjoining land covered by the plan and, as authorised by section 6, also covered by the plan:	Section 3.3 outlines responsibilities in road reserves and the portions of road to which the Plan applies.
73(3)(m)	The commencement date and the termination date:	Section 1.3 currently specifies that the date of commencement will be in accordance with the section 77 of Act. The commencement date will be added when the Council affixes it's seal to the plan in accordance with section 77(1). The termination date is set 20 years from commencement.
73(3)(n)	Any matters required by the national policy direction.	Refer to Table 3 of this document regarding compliance with the NPD.
<b>73(4)</b>	<b>Compensation</b> <b>A plan -</b>	

73(4)(a)	May provide for the compensation for losses incurred as a direct result of the implementation of the plan:	Section 3.2 provides that the plan will not provide for compensation to be paid to any persons meeting their obligations through its implementation.
73(4)(b)	<p>Must not provide for the payment of compensation for the following losses:</p> <p>(i) loss suffered because a person's income derived from feral or wild organisms is adversely affected by the implementation of the plan:</p> <p>(ii) loss suffered before an inspector or authorised person establishes the presence of the pest on the place of the person suffering the loss:</p> <p>(iii) loss suffered by a person who fails to comply with the plan.</p>	Section 3.2 provides that the plan will not provide for compensation to be paid to any persons meeting their obligations through its implementation.
<b>73(5)(a)-(s)</b>	<p>Rules</p> <p>A plan may include rules for all or any of the following purposes:</p> <p>(a) requiring a person to take specified actions to enable the management agency to determine or monitor the presence or distribution of the pest or a pest agent:</p> <p>(b) requiring a person to keep records of actions taken under the rules and to send to the management agency specified information based on the records:</p> <p>(c) requiring the identification of specified goods:</p> <p>(d) prohibiting or regulating specified methods that may be used in managing the pest:</p> <p>(e) prohibiting or regulating activities that may affect measures taken to implement the plan:</p> <p>(f) requiring audits or inspections of specified actions:</p> <p>(g) specifying, for the purposes of section 52(a), the circumstances in which the pest may be communicated, released, or otherwise spread:</p> <p>(h) requiring the occupier of a place to take specified actions to eradicate or manage the pest or a specified pest agent on the place:</p> <p>(i) requiring the occupier of a place to take specified actions to eradicate or manage the habitat of the pest or the habitat of a specified pest agent on the place:</p> <p>(j) prohibiting or regulating specified activities by the occupier of a place if the activities are of the kind that would promote the habitat of the pest on the place:</p>	<p>The plan includes rules for the purposes described in the Act. There are three rules in the Plan.</p> <p>Plan rule 1 is included for purposes (b), (c), (n), and (s) described in the Act.</p> <p>Plan rules 2 and 3 are included for purpose (h) described in the Act.</p>

	<p>(k) requiring the occupier of a place to carry out specified activities to promote the presence of organisms that assist in the control of the pest on the place:</p> <p>(l) prohibiting or regulating specified activities by the occupier of a place, which deter the presence on that place of organisms that assist in the control of the pest:</p> <p>(m) requiring the occupier of a place to carry out specified treatments or procedures to assist in preventing the spread of the pest:</p> <p>(n) requiring the owner or person in charge of goods to carry out specified treatments or procedures to assist in preventing the spread of the pest:</p> <p>(o) requiring the destruction of goods if the goods may contain or harbour the pest or otherwise pose a risk of spreading the pest:</p> <p>(p) prohibiting or regulating specified uses of goods that may promote the spread or survival of the pest:</p> <p>(q) prohibiting or regulating the use or disposal of organic material:</p> <p>(r) prohibiting or regulating the use of specified practices in the management of organisms that may promote the spread or survival of the pest:</p> <p>(s) prohibiting or regulating the movement of goods that may contain or harbour the pest or otherwise pose a risk of spreading the pest.</p>	
<b>73(6)</b>	<b>A rule may –</b>	
73(6)(a)	Apply generally or to different classes or descriptions of persons, places, goods, or other things:	The rules apply generally or to different classes or descriptions of persons, places, goods or other things.
73(6)(b)	Apply all the time or at 1 or more specified times of the year:	The rules apply all of the time.
73(6)(c)	Apply throughout the region or in a specified part or parts of the region with, if necessary, another rule on the same subject matter applying to another specified part of the region:	The rules either apply throughout the region or in a specified part or parts of the region. Section 6 specifies where each objective and rule applies.
73(6)(d)	Specify that a contravention of the rule creates an offence under section 154N(19).	The rules specify that a contravention of the rule creates an offence under section 154N(19)

Table 2 – Section 74, Fifth step: Satisfaction on contents of Plan and requirements

Section 74 of the Biosecurity Act 1993 provides that if the Council is satisfied that section 73 has been complied with, the council may take the fifth step in the making of a plan, which is for the Council to consider whether the Council is satisfied, in relation to the plan prepared under section 73.

Section of Act	Requirement	Can the Council be satisfied?
74(a)	That the plan is not inconsistent with—	
	(i) the national policy direction; or <i>The NPD contains the following relevant directions: Clause 4 – Directions on setting objectives</i> <i>Clause 5 – Directions on programme description</i> <i>Clause 6 – Directions on analysing benefits and costs</i> <i>Clause 7 – Directions on proposed allocation of costs for pest management plans</i> <i>Clause 8 – Directions on Good Neighbour Rules</i>	Yes, an analysis of compliance with the NPD is outlined in Table 3.
	(ii) any other pest management plan on the same organism; or	Yes, see Section 2.3 of the Plan.
	(iii) any pathway management plan; or	NA. There are no applicable pathway management plans.
	(iv) a regional policy statement or regional plan prepared under the Resource Management Act 1991; or	Yes, Section 2.3 discusses the relationship with RMA plans and policy statements.
	(v) any regulations; and	Yes, Section 2.3 of the Plan discusses this. It is noted that ‘regulations’ is defined in the Act as regulations made under the Biosecurity Act 1993.
74(b)	That, for each subject of the plan, the benefits of the plan outweigh the costs, after taking account of the likely consequences of inaction or other courses of action; and	Yes, the costs and benefits are summarised within the CBA Report, along with alternate actions or inaction. The detailed assessments of these matters are contained in the CBA Report.

74(c)	<p>That, for each subject of the plan, persons who are required, as a group, to meet directly any or all of the costs of implementing the plan—</p> <p>(i) Will accrue, as a group, benefits outweighing the costs; or</p> <p>(ii) Contribute, as a group, to the creation, continuance, or exacerbation of the problems proposed to be resolved by the plan; and</p>	<p>Yes, the beneficiaries and exacerbators are documented within the CBA report.</p> <p>It is considered that overall benefits exceed costs for all pests when the proposed management objective is compared with doing nothing. For two pests, Chilean rhubarb and broom, the costs outweigh benefits when considering the impacts on production values alone. However, when taking into account the impact of these pests on other values, including biodiversity, cultural and landscape values, it is regarded that overall, the benefits of control outweigh the costs.</p> <p>In general, the recommendation is for Council to 100% fund the pest programme from general rates and Crown contribution, as most of the pests impact values that provide non-monetised benefits to the wider community, such as biodiversity, and the wider Chatham Islands community are the primary exacerbators. Conversely, gorse solely impacts private land occupiers, particularly farmers and growers, so it is recommended that they are responsible for funding 100% of control costs for gorse, as exacerbators.</p>
74(d)	<p>That, for each subject of the plan, there is likely to be adequate funding for the implementation of the plan for the shorter of its proposed duration and 5 years; and</p>	<p>A funding analysis is set out in section 9 of the Plan. The Council, as the management agency, has the authority to rate and amend rates to implement the Plan.</p> <p>All subjects of the Plan are expected to have adequate funding for the implementation of the Plan for its proposed duration and 5 years.</p>
74(e)	<p>That each rule -</p> <p>(i) will assist in achieving the plan's objectives; and</p>	<p>Yes. The rules provide an essential regulatory backup to ensure actions taken by landowners, the Council or other parties are effective and efficient. The specific reasons for each rule are provided in the explanations accompanying the rules in Section 6.</p>

	(ii) will not trespass unduly on the rights of individuals.	Yes. The Plan has undergone a legal review. The rules in the Plan are similar to those adopted in the previous RPMS. The new rules do not unduly trespass on the rights of individuals.
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Table 3 – National Policy Direction (NPD) for Pest Management 2015

Section 73 of the Biosecurity Act 1993 requires the Plan to set out (among other things):

*(3)(n) Any matters required by the national policy direction.*

Section 74 of the Biosecurity Act 1993 requires the Council to consider whether the Council is satisfied that the Plan is not inconsistent with the national policy direction.

Section of the NPD	Requirement	How does this meet the S73 and 74 requirements / how this is addressed in the Plan?
4. DIRECTIONS ON SETTING OBJECTIVES - Pest Management Plan		
4(1)	For each subject in a proposal for a pest management plan, or in a pest management plan, the objectives in the plan must:	
4(1) (a)	state the particular adverse effect or effects of the subject on the matters listed in section 54(a) of the Act that the plan addresses; and	The adverse effects of each pest are described in the Plan Appendix 2 and the relevant objectives set out in Section 6.
4(1)(b)	<p>state the pest management intermediate outcomes that the plan is seeking to achieve, being one or more of the following intermediate outcomes:</p> <p>(i) "exclusion" which means to prevent the establishment of the subject that is present in New Zealand but not yet established in an area;</p> <p>(ii) "eradication" which means to reduce the infestation level of the subject to zero levels in an area in the short to medium term;</p> <p>(iii) "progressive containment" which means to contain or reduce the geographic distribution of the subject to an area over time;</p> <p>(iv) "sustained control" which means to provide for ongoing control of the subject to reduce its impacts and its spread to other properties;</p> <p>(v) "protecting values in places" which means that the subject that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place;</p>	All pests are to be managed under programmes that seek to achieve either exclusion, eradication, progressive containment or sustained control. These outcomes are reflected in the objectives of the Plan in Section 6.

4(1)(c)	<p>for each applicable outcome in sub clause (1)(b)(i) to (iv), specify -</p> <p>(i) the geographic area to which the outcome applies; and</p> <p>(ii) the extent to which the outcome will be achieved (if applicable); and</p> <p>(iii) the period within which the outcome is expected to be achieved; and</p>	<p>(i) The geographic area to which the outcome applies is described in each objective, being either the Chatham Islands Territory, Pitt Island/Rangihau/Rangiauria only, or a specified area shown on the maps contained in the Plan Appendix 2.</p> <p>(ii) The extent to which the outcomes will be achieved under the Plan are specified within each objective.</p> <p>(iii) The period within which outcomes are expected to be achieved are specified within each objective. Where necessary, the objectives state the outcome to be achieved in the first 5 or 10 years, as required by 4(1)(f) below.</p>
4(1)(d)	<p>for the outcome in sub clause (1)(b)(v) [ <i>“protecting values in places ”</i> ] (if applicable), specify-</p> <p>(i) one of the following:</p> <p>(A) the geographic area to which the outcome applies (if practicable); or</p> <p>(B) a description of a place to which the outcome applies; or</p> <p>(C) the criteria for defining the place to which the outcome applies; and</p> <p>(ii) the extent to which the outcome will be achieved (if applicable); and</p> <p>(iii) the period within which the outcome is expected to be achieved; and</p>	<p>No programmes under sub clause (1)(b)(v) are included in the Plan.</p>
4(1)(e)	<p>In relation to sub clause (1)(d)(i)(B) and (C), if a description or criteria is used to describe places to which an outcome applies, the description or criteria must give sufficient certainty, in the view of the relevant regional council (in the case of regional pest or pathway management plans) or the Minister responsible for the plan (in the case of national pest or pathway management plans), to land owners and occupiers so that they are aware that the outcome applies to them; and</p>	<p>The geographic area to which the outcome applies is described in each objective, being either the Chatham Islands Territory, Pitt Island/Rangihau/Rangiauria only, or a specified area shown on the maps contained in the Plan Appendix 2.</p>
4(1)(f)	<p>if the period within which the pest management intermediate outcome is expected to be achieved is more than 10 years, state what is intended to be achieved in the first 10 years of the plan, or during the current term of the plan prior to next review (as applicable).</p>	<p>Where necessary, 5- or 10-year outcomes are provided. In many instances the outcome is on-going and applies year on year (such as preventing the spread of a containment pest).</p>

5. DIRECTIONS ON PROGRAMME DESCRIPTION		
5(1)	<p>For each subject in a pest management plan or pathway management plan, the plan must contain one or more of the following programmes, and may not contain any other types of programmes:</p> <p>(a) "Exclusion Programme" (if applicable) in which the intermediate outcome for the programme is to prevent the establishment of the subject, or an organism being spread by the subject, that is present in New Zealand but not yet established in an area:</p> <p>(b) "Eradication Programme" (if applicable) in which the intermediate outcome for the programme is to reduce the infestation level of the subject, or an organism being spread by the subject, to zero levels in an area in the short to medium term:</p> <p>(c) "Progressive Containment Programme" (if applicable) in which the intermediate outcome for the programme is to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time:</p> <p>(d) "Sustained Control Programme" (if applicable) in which the intermediate outcome for the programme is to provide for ongoing control of the subject, or an organism being spread by the subject, to reduce its impacts on values and spread to other properties:</p> <p>(e) "Site-led Pest Programme" (if applicable) in which the intermediate outcome for the programme is that the subject, or an organism being spread by the subject, that is capable of causing damage to a place is excluded or eradicated from that place, or is contained, reduced, or controlled within the place to an extent that protects the values of that place:</p> <p>(f) for pathway management plans, if none of the programmes in subclause (a) to (e) are applicable, the plan must contain a "Pathway Programme" in which the intermediate outcome for the programme is to reduce the spread of harmful organisms.</p>	<p>All pests are included within one of these programmes. There are no other programmes proposed.</p>

5(2)	The specific names for programmes as set out in sub clause 5(1)(a) to (f) must be used as appropriate in all pest management plans and pathway management plans.	The Plan uses these specific names.
5(3)	The programme selected for a subject in a plan under sub clause (1) must be consistent with the pest management intermediate outcome stated for the subject in the plan under clause 4 of this national policy direction.	The programmes are consistent with the intermediate outcomes under clause (4) (see previous comment on clause 4 above).
<b>6. DIRECTIONS ON ANALYSING BENEFITS AND COSTS</b>		
6(1)	<p>When determining the appropriate level of analysis of the benefits and costs of the plan for each subject for the purposes of a proposal for a pest management plan or pathway management plan, a proposer must consider:</p> <p>(a) the level of uncertainty of the impacts of the subject, or an organism being spread by the subject, and of the effectiveness of measures; and</p> <p>(b) the likely significance of the subject, or an organism being spread by the subject, or of the proposed measures, in terms of stakeholder interest and contention, and total costs of the proposed plan; and</p> <p>(c) the likely costs of the programme relative to the likely benefits; and</p> <p>(d) the level of certainty and the quality of the available data.</p>	The criteria for determining the level of analysis have been applied and are documented in Section 2.3.1 of the CBA Report.
6(2)	<p>In the proposal for a pest management plan or pathway management plan, an analysis of the benefits and costs of the plan for each subject must:</p> <p>(a) identify, and quantify (if practicable), the impacts of the proposed subject or an organism being spread by the subject; and</p> <p>(b) identify two or more options for responding to the subject or an organism being spread by the subject (one option must be either taking no action or taking the actions that would be expected in the absence of a plan); and</p> <p>(c) identify, and quantify (if practicable), the benefits of each option; and</p> <p>(d) identify, and quantify (if practicable), the costs of each option; and</p>	<p>The cost benefit analysis for each pest complies with these steps. The details are documented within the CBA Report.</p> <p>In relation to (g), (h) and (i) the risks and, where possible, mitigation measures are described. The benefits and costs have been adjusted to take account of these.</p> <p>The Proposal for the Plan summarises the options considered and clearly identifies preferred option (Proposed Objective) and outlines the reason for selecting this option.</p>

	<p>(e) state the assumptions (if any) on which the impacts, benefits and costs are based; and</p> <p>(f) be at an appropriate level of detail as determined in accordance with sub clause (1); and</p> <p>(g) take into account any risks that each option will not achieve its objective; and</p> <p>(h) identify any realistic mitigation options for the risks identified in sub clause (2)(g); and</p> <p>(i) adjust the benefits and costs for each option as appropriate to take account of sub clause (2)(g) and (h); and</p> <p>(j) clearly identify which option is preferred.</p>	
6(3)	<p>When taking into account any risks that each option will not achieve its objective under sub clause (2)(g), a proposer must consider:</p> <p>(a) the technical and operational risks of the option; and</p> <p>(b) the extent to which the option will be implemented and complied with; and</p> <p>(c) the risk that compliance with other legislation will adversely affect implementation of the option; and</p> <p>(d) the risk that public or political concerns will adversely affect implementation of the option; and</p> <p>(e) any other material risk.</p>	This has been done and is documented in the CBA Report for each pest programme.
6(4)	<p>When taking into account any risks that each option will not achieve its objective under sub clause (2)(g), a proposer must:</p> <p>(a) for analyses where the benefits are fully quantified, either:</p> <p>(i) estimate the residual risks as a probability of success and calculate the expected benefits of the option by multiplying the benefits by the probability of success; or</p> <p>(ii) state the residual risks to the programme and calculate what the probability of success would need to be to make the expected benefits equal the costs; and</p> <p>(b) for all other analyses (where the benefits are not fully quantified):</p>	The analysis was undertaken in accordance with 6(4)(b), which is detailed in the CBA report. Benefits and risks are generally not fully quantified and have been discussed in qualitative terms. The risks to the programme for each pest are documented and allocated a likelihood and impact. Benefits and costs are adjusted based on risks and discussed within the analyses of each programme.

	<p>(i) state the residual risks to the programme and, where practicable, give an indication of likelihood and impact; and</p> <p>(ii) specify which of the benefits are most likely to be affected if the risk eventuated.</p>	
6(5)	The proposer of a pest management plan or pathway management plan must document the assessments made in sub clauses (1), (3) and (4) and make them publicly available with the proposal for a pest or pathway management plan.	The assessments are contained within the CBA Report, which are available with the Proposal on Chatham Islands Council website.
7. DIRECTIONS ON PROPOSED ALLOCATION OF COSTS FOR PEST AND PATHWAY MANAGEMENT PLANS		
7(1)	<p>If a proposer of a pest or pathway management plan is determining an appropriate grouping of subjects, or organisms being spread by the subject, for cost allocation analysis, the proposer must consider:</p> <p>(a) whether the subjects, or organisms being spread by the subject, have similar groups of beneficiaries and exacerbators; and</p> <p>(b) whether the exacerbators have similar existing legislative responsibilities and rights; and</p> <p>(c) if applicable, whether the organisms in a proposed pest management plan are at a similar stage of infestation and whether the proposer has similar management objectives for the organisms.</p>	The CBA report describes groupings. Pests have been grouped together in their programmes where it is reasonable to do so, as shown in Table 3 of the CBA Report. Where pests differ in their proposed objective, scale, and/or level of assessment, they have been assessed separately.
7(2)	<p>When determining the appropriate cost allocation to be proposed for a pest management plan or pathway management plan, a proposer must:</p> <p>(a) identify and estimate the direct costs of the plan and identify the indirect costs of the plan; and</p> <p>(b) where possible, identify the beneficiaries of the plan; and</p> <p>(c) where possible, identify the active and passive exacerbators; and</p> <p>(d) determine whether the best cost allocation method is to have beneficiaries or exacerbators or a mixture of both bearing the costs of the plan and determine the appropriate cost allocation by considering all of the following matters:</p>	<p>(a) The direct and indirect costs are described in the CBA Report for each pest.</p> <p>(b) and (c) The beneficiaries and exacerbators are identified and described in the CBA Report for each pest and in Section 9 of the Proposal for the Plan.</p> <p>(d) All these matters are addressed for each pest in the CBA Report and in Section 9 of the Proposal for the Plan.</p>

	<p>(i) the legislative responsibilities and rights of beneficiaries and exacerbators;</p> <p>(ii) the management objectives of the plan and the stage of infestation;</p> <p>(iii) the most effective agents to undertake the control to meet the objectives of the plan;</p> <p>(iv) if proposing that beneficiaries bear any of the costs of the plan, how much each group of beneficiaries will benefit from the plan and whether each group of beneficiaries will benefit more than the amount of costs that it is proposed that it bear;</p> <p>(v) if proposing that exacerbators bear any of the costs of the plan, how much each group of exacerbators is contributing to the problem addressed by the plan;</p> <p>(vi) the degree of urgency to make the plan;</p> <p>(vii) efficiency and effectiveness of the cost allocation method and proposed cost allocation;</p> <p>(viii) practicality of the cost allocation method and proposed cost allocation;</p> <p>(ix) administrative efficiency of the cost allocation method and proposed cost allocation;</p> <p>(x) security of funding of the cost allocation method and proposed cost allocation;</p> <p>(xi) fairness of the cost allocation method and proposed cost allocation;</p> <p>(xii) whether the proposed cost allocation is reasonable; (xiii) the parties who will bear the indirect costs of the plan;</p> <p>(xiv) the need for any transitional cost allocation arrangements;</p> <p>(xv) the mechanisms available to impose the cost allocation; and</p>	
7(e)	<p>consider what is the best mechanism(s) to impose the cost allocation, taking into account the cost allocation method chosen, the most effective control tools and agents to undertake the control to meet the objectives of the plan, practicality, administrative efficiency, security of funding and any statutory requirements; and</p>	<p>All the matters listed in 7(e) have been considered in choosing the cost allocation mechanism and an overall judgement made as to which is the best mechanism. This is reflected in various parts of the Plan, including the choice of programme, objective and principal measures (see Section 6 of the Plan) and the matters contained in section 9 of the Plan.</p>

7(f)	document the steps and assessments carried out under sub clause (a) to (e) and the rationale for the proposed allocation of costs and make them publicly available with the proposal for a pest or pathway management plan.	Section 9 of the Plan outlines the rationale for the proposed allocation of costs. This is supported by the analysis in the CBA Report.
8. DIRECTIONS ON GOOD NEIGHBOUR RULES		
8(1)	<p>Before a rule can be identified as a Good Neighbour Rule in a regional pest management plan, the regional council must be satisfied of the matters in sub clause (a), (c), and (d) and must comply with the requirements in sub clause (b) and (e):</p> <p>(a) In the absence of the rule, the pest would spread to land that is adjacent or nearby within the life of the plan and would cause unreasonable costs to an occupier of that land.</p> <p>(b) In determining whether the pest would spread as described in sub clause (a) the regional council must consider the proximity and characteristics of the adjacent or nearby land and the biological characteristics and behaviour of the particular pest.</p> <p>(c) The occupier of the land that is adjacent or nearby, as described in sub clause (a), is taking reasonable measures to manage the pest or its impacts.</p> <p>(d) The rule does not set a requirement on an occupier that is greater than that required to manage the spread of the pest to adjacent or nearby land as described in sub clause (a).</p>	<p><i>The statements for this section (below) reflect the test of whether the Council can be satisfied.</i></p> <p>Yes. The Council can be satisfied as the Good Neighbour Rules apply only to pests whose characteristics and ability to spread are well known.</p> <p>Yes, as above. In addition, the rules for each pest reflect the distribution of the pest and distance and speed with which it can spread.</p> <p>Yes. The rule only applies if the adjacent occupier is undertaking control actions. In implementing the rule, inspection will determine whether such control actions are being undertaken.</p> <p>The rule does not set a requirement on an occupier that would be greater than that required to manage the spread of the pest to adjacent or nearby land. The Plan includes a 15 metre boundary clearance rule for gorse.</p> <p>The buffer approach is a reasonably practicable option compared to a requirement to destroy these pests across the entire property. The 15m buffer distance is a practical distance for managing the spread arising from explosive seed dispersal, transport by farm machinery between farms or stock movement across boundaries and is related to the spread characteristics of the pest.</p>

	<p>(e) In determining the rules to be set to manage the costs to an occupier of land that is adjacent or nearby, of the pest spreading, the regional council must consider:</p> <p>(i) the biological characteristics and behaviour of the particular pest; and</p> <p>(ii) whether the costs of compliance with the rule are reasonable relative to the costs that such an occupier would incur, from the pest spreading, in the absence of a rule.</p>	<p>Yes, for the reasons given in (a) to (d) above. Also see Section 5 of the CBA Report, which specifically address 8(c)(ii).</p>
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