
**Submissions
Summary for the
Pest Management
Proposed
National Plan of
Action 2010–2035**

29 July 2010

This report summarises submissions received by MAF Biosecurity on the 'Proposed National Plan of Action for Pest Management 2010 - 2035'. The plan was open for submissions from 21st June 2010 until 19th July 2010 (with late submissions being included up to 27th July).

An online submission form was available and used by most submitters to frame their submissions. This was based around questions provided in the proposed plan but did not limit submitters to commenting only on these issues.

In total 42 submissions were received plus the notes from four workshops held in Christchurch (W1), Wellington (W2), Auckland (W3) and with tāngata whenua (W4) (for details see p 20 below). The ideas in every submission were classified using Buzan mind-mapping and the results coded into a database. A summary of the results is recorded below grouping the matters raised under the four themes of the document:

- 1. Clear roles and accountabilities**
- 2. Improved and simplified processes**
- 3. Better and more accessible tools**
- 4. Acting collectively**

Plus

- 5. Comments on the overall plan and process to date**
- 6. Funding**
- 7. Wider Context**

Responses to the questions posed in the proposed plan are included under the relevant heading.

Two submissions referred only to banning 1080. (5, 17) The remaining submissions and workshop notes are summarised below.

1. Clear roles and accountabilities

1.1. Purpose of Pest Management

Twelve submitters and two workshops commented on the revised purpose for pest management in the Biosecurity Act (10, 25, 36, 30, 7, 34, 27, 33, 36, 41, 21, 41, W2, W3). Two explicitly supported including pathways and vectors by which harmful organisms can spread (25, 30). Four supported costs being fairly distributed (7, 10, 25, 34). One submitter noted that local funding and prioritisation of activities would limit the ability of any local authority to participate under the plan (34). Another noted that 'environment' should include indigenous biodiversity (41) and another that the purpose should include animal welfare (25). Workshop 2 raised the issue of compensation in the review and the fact that the Minister would direct all to contribute. While workshop 3 noted that the scope of the review is on the processes and roles rather than details of specific pests.

1.2. The Crown as a good neighbour landowner

Eighteen submitters were in support of the Crown being bound to good neighbour rules in regional pest management strategies (6, 7, 10, 11, 15, 18, 20, 22, 23, 24, 25, 26, 29, 33, 37, 38, 40, 41). Workshop 2 clarified that the Crown will be exempt from being bound to National RPMs and that all parties will be bound to RPMs. One submitter raised the question of how the 'Crown as good neighbour landowner' proposals will operate in relation to the foreshore and sea bed in the absence of Crown ownership (24). Another raised the issue of funding through Vote Biosecurity (41) while concern that managing pests at the boundary will suck DOC funds from other priority biosecurity outcomes. At the same workshop questioned how much analysis of public/private performance there is against RPMs, suggesting that what is needed is a process for prioritising and decision making. Workshop 3 notes that binding the Crown will drive incentives to engage early in the development of Pest Management Strategies. Another issue explored at the same workshop was concern that the

public might be excluded from the process, with criteria being developed for when more streamlined process should be used.

One submitter objects to this proposal in principle and recommends that the decision to bind the Crown to RPMSs is reconsidered.(36) If the Crown is to be bound, the recommendation is made to increase DOC and LINZ funding, the development of NPMSs as a priority and delaying the commencement of Crown obligation pending RPMS reviews.

1.3. Providing MAF and regional councils with clear pest management functions

Most submitters commented on this issue. Most were in support of clearer direction. Submission (20) expressed concern about the role of Department of Conservation not being clearly stated.

The functions of MAF were referred to in 21 submissions (1, 4, 6, 7, 8, 10, 11, 12, 14, 18, 20, 22, 23, 25, 26, 28, 29, 30, 31, 35, 41). One supported MAF's oversight role, noting that MAF's lack of skills in operational pest management would need to be acknowledged (26). It was noted at workshop1 that MAF will lead the policy direction with collaboration with landowning Crown agencies and regional councils.

Measuring overall system performance against outcomes was cited in three submissions (7, 26, 41) with the additional suggestions of explicit reference to review following measurement of performance (41).

Five submitters and one workshop commented on MAF's facilitator and coordination role (10, 22, 25, 26, 35, W2, W3). Workshop 2 also noted that MAF is in a good position to co-ordinate, but, need a very good tool and eyes and ears to make sure this is a fair and equitable process. One noted that cost effectiveness should not be the only consideration (10). Another noted the need to identify *all* affected parties who need to be involved (22). Several submissions commented about the need to support any changes under the proposed plan with appropriate education and training, for both those working in the sector and also those in the community who will be affected. Specifically on this topic, submission 35 suggests the inclusion of fully resourced extension activities.

Concern was expressed regarding MAF's role overseeing and providing pest and pathway management programmes, with submission 18 suggesting that MAF will need to include species specific codes of practice e.g. aquaculture. Workshop1 raised the issue of pest which have cross regional boundary issues and how this related to the Surveillance Strategy. Submission 11 suggests properly funded research to help achieve the programmes.

Other functions for MAF stated in 10 submissions (1, 4, 6, 7, 11, 12, 18, 20, 26, 41) and were:

- Establishing National Priority Quarantine Sites. (1)
- Aligning Pest management with the whole of the biosecurity system and greater public education. (4)
- Ensuring that the functions given are not exhaustive. (6)
- Clarity of wording: refer to BCRF function groupings in Section 5 of analysis document and ensuring at a high level. (7)
- Gatekeeper role and agreement on criteria for classifying pests plus strong research backing. (11)
- Include surveillance. (12)
- Where ownership of land is unclear, MAF role in managing programmes and costs. (18)
- MAFs role in biosecurity research. (20)
- Public advocacy role to promote understanding and acceptance of tools. (26)

- Providing funding for capability and capacity retention. (28)
- Function (b) to include 'review', coordination of toolbox and regulation where necessary. (41)

The functions of Regional Councils were discussed in 20 submissions (4, 7, 8, 11, 15, 18, 19, 20, 21, 22, 23, 25, 26, 28, 29, 30, 31, 32, 35, 41). Workshop 3 highlighted the variation in resourcing of biosecurity within councils and the need to make decisions based on limited resources.

Submission 18 strongly supports the allocation of clear roles and accountabilities. However submission 35 notes that regional Councils are unlikely to have the capability to lead all pest management or in relation to nationally grown export crops. Some caution is stated with Regional Councils leadership role being required to link with national strategy and as the lead management agency (26). Also submission 31 does not feel that regional councils could currently effectively carry out functions B and D without further training. Submission 30 states that alignment of Crown and regional activities will maximise benefits.

Submission 7 suggests removing the need for ensuring alignment with national policy stating this is a general duty of all those involved in the Act.

Two submissions supported regional council facilitation role, with specific mention of effective consultation with tāngata whenua (21, 22) with one against it (32).

Five submitters referred to regional councils providing pest management programmes (8, 18, 19, 20,21). Suggestions included involvement of local landowners (8), taking the lead for pests affecting public goods (18), including adequate performance monitoring (20).

The question was also raised about how regional councils would access BS Act powers and the link with economic pest management (19).

Workshop 4 explored the criteria for 'not notifying' on a RPMS and would stakeholders potentially be left out. The response was that for regional plans anyone affected should be notified and for national plans the Minister would have to be satisfied with the level of consultation.

Other functions for regional councils were suggested in submissions. (4, 7, 8, 15, 19, 20, 32, 41):

- Greater education and awareness. (4)
- Consistency between MAF and council functions. (7)
- Inclusion of district level strategies. (8)
- Regional Councils taking lead for pests affecting public goods and industry taking lead when sector or industry affected. (15)
- Accessing BS Act powers and linking with economic pest management. (19)
- Better coordination of cross regional pest management. (20)
- Regional councils to do less, not more. (32)
- Regional councils to be given a regulatory function. (41)

Roles for individual parties were cited in eight submissions (15, 18, 19, 25, 29, 30, 31, 35):

- Roles for industry and council where public and private interests are disputed. (15, 18)
- Powers for individual parties. (19)
- Appropriate representation and eligibility for compensation for affected parties.(25)

- Industry as initiator for pest management strategy. (29)
- Leadership model to take account of outcomes. (30)
- The role of private interests and responsibilities. (31)
- Incentivise and resource industry to solve pest management problems. (35).

1.4. Roles in Marine Environment

Eighteen submitters expressed views on this issue and supported the actions put forward in the plan (1, 4, 6, 7, 8, 11, 12, 13, 15, 18, 19, 21, 22, 24, 30, 31, 41, 42).

Submitter 1 noted that 'international oil rigs should be included under pathway/vector management with Maritime NZ having responsibility. Site/place management and the complex ownership issues involved (11, 12, 42) were also raised. Assistance for assigned roles was raised as well as accompanying powers (4, 19) with clearer definitions of structure owners and landowners (18).

Submitter 7 saw this as work in progress with other tools (such as RMA) being more relevant and economic factors being considered. The interface with the Fisheries Act is cited (15). Submission 21 asks for tāngata whenua engagement by all lead agencies and the effects of decisions regarding changes to foreshore and seabed regulations (24). Clarity of roles around Marine Protected Areas was also sought (22). The suggestion that control of intra-regional movement may not be best placed with regional councils and guidance would have to allow for regional variation (42).

Workshop 3 raised several issues around marine roles and responsibilities including how regional councils are resourced to manage marine pests. MAF have a lead role where there are national issues in vector management but this does not preclude regional council or other parties' involvement and table 4 should be amended to reflect this.

The lack of inclusion of freshwater environments is seen as a defect of the programme with clarity required around responsibility for freshwater biosecurity, (11, 41) and extension to land based aquaculture (31).

1.5. Minister for Biosecurity to assign lead accountability on complex issues

Thirteen submissions were in support of the Minister of Biosecurity having this role (1, 4, 6, 7, 10, 14, 15, 18, 20, 21, 29, 30, 31, 35, 37, 41, 42). Four of these submissions suggested the inclusion of process timelines (12, 18, 41, 42). Advisors were also suggested (10, 41) including experts and agency representatives. Two submissions were against the Minister holding this role stating that it should be the role of a committee as it is a technical and not a political decision (30, 36). Submission 42 suggests caution in setting up governance but requiring a mandate for member inclusion. Workshop 2 included the proposed model where there is an independent committee that will advise the Minister to make a decision, coordinated by MAF and BCR meeting 3-4 times a year to look at the interface between regional and central government.

Other comments about the Ministerial role were given as

- MAFNZ leading and prioritising funding. (1)
- The need to consult with landowners. (80)
- The fact that the Minister is not able to assign accountability to any non-government sector such as industry. (10, 42)
- Decision making aligned with those who will bear costs. (12)

- Maori Advisory Committee formed with statutory functions and national biosecurity document to specify when Minister would assign roles.(21)
- Appointment of an ‘arbiter.’ (29)
- Minister unable to delegate function to MAF. (30)
- Necessity for a pathway of concerted action to ensure agencies take on assigned roles. (32)
- The distinction between the Minister’s role and MAF’s. (p.16) (28)
- The provision of guidance on how to deal with sites that involve multiple agencies.(42)
- Accountability for decision making aligned with those who will bear the costs. (42)

1.6. Māori Advisory Committee

Fifteen submissions supported the establishment of a Māori Advisory Committee (1, 4, 7, 8, 12, 18, 19, 20, 21, 27, 30, 31, 32, 37, 41), with 1 noting that there should be Advisory Committees for all sectors of NZ society (8) and one requesting a similar committee of NGOs or the proposed MAC is not supported (32).

One noted that a separate committee was unnecessary if key responsible agencies consult appropriately (11), while another noted that there was insufficient discussion about mandate to comment (6). 1 notes this will be a delicate relationship to develop and sustain (13). Submission 28 comments that the committee would have to make substantive contributions so as not to be seen as token.

Several submissions noted that such an advisory committee could be utilised across the biosecurity sector (19, 31, 42) and to link to the committee in ERMA (20) and National Iwi Fisheries Forum (contact details provided) (31). If this was the case, submission 42 notes that the flexibility to do this would have to be built in from the outset.

Suggested roles for the committee include

- Ensuring correct processes are followed for engaging with tāngata whenua .(21)
- Defining the role of the committee in statute. (21,
- Advising MAF on lead accountability issues. (24)
- Advise on Māori cultural values.(41)

Submission 41 also noted the need for statutory basis and transparent composition of the current Ministerial Advisory Committee and the importance of scientific and technical expertise. The establishment of the committee was discussed at workshop 4 with issues such as timeframes, structure and co-management being discussed. It was noted that it is still at concept stage and that the idea is that it will operate for 2 years and then be business as usual, with MAF leading and that further ideas were welcomed.

1.7. Review of pest management legislation

The majority of submitters were in favour of the proposed review in addition, seventeen Acts, regulations, systems and processes were raised for inclusion in the review of pest management legislation.

- The Reserves Act 1977: 3 submitters (1,21,32) for review, with one against (30)
- QE11 National Trust Act 1977 (1)
- Te Turi Whenua/ Māori Land Act (1)
- Animal Welfare Act (4)
- Hazardous Substances and New Organisms Act 1997 (4, 20, 26, 28, 35)
- Section 27zm of the Conservation Act and the Freshwater Fisheries regulations 1983 (6, 18, 22, 24, 30)
- Regulations made under all suggested Acts (6)
- Resource Management Act (7, 15,18,21)
- Licensing and Inspection System (11)
- Fisheries Act 1996 (6)
- NZ Coastal Policy Statement 2008 (15)
- Legislation for the EEZ (15)
- Maritime Transport Act
- Agricultural Compounds and Veterinary Medicines Act 1997 (20, 26, 35)
- Inclusion of Treaty Clause in BSA (21)
- WAC Act (23)
- Fencing Act (30)
- Transportation and carriage and sale of goods legislation (32)
- National Parks Act – 2 submitters against inclusion of this (30, 32)

Other issues related to this were:

- The definition of “game” as opposed to “pest” and the need to focus on outcomes. (7)
- The need to address gaps and overlaps in the coastal marine area. (15)
- The Role of the Big Game Establishment Council .(23)
- Consultation with affected parties during the review (Animal Health Board, Southland Conservation Board). (26, 38)
- Respect for private landowners’/ mangers’ properties. (27)
- Separating this section from operational and strategic proposals of plan and rework to formalised proposal. (32)

1.8. Expected Effects of clear purpose , roles and duties

One submitter (7) commented on this, supporting the intended effects.

2. Improved and Simplified Processes

These are generally supported in all submissions. Additional comments and suggestions are outlined below. Submission 21 raised the issue of improving and simplifying done together can be being problematic.

2.1. Simplified processes for strategies and rules

Fourteen submissions comment on this issue (4, 7, 8, 20, 22, 24, 25,26, 27,32, 35, 36, 40, 41) with the majority being supportive.

Comments on the specific improvements are outlined below:

Renaming as pest management plans was supported in three submissions (28, 36, 37).

Amending the notification and consultation provisions was raised in seven submissions with two raising the need for appropriate public consultation (20, 41) and one for the need for transparency (22). Another (24) notes the need for a trigger which is cognisant of tāngata whenua priorities, while another raises the need for consultation with relevant, affected Crown agencies (30) Workshop 2 discussed that if there is a restricted group of affected people then there should be an easier, low level process.

Discretion over inquiry generated nine comments which were split between those who supported the proposal (10, 37, 26, 29) those who supported the proposal with some qualifications – the inclusion of all affected parties (24, 30) and those against (8, 32 ,41).

The partial review of pest management strategies was supported in six submissions (10, 23, 32, 36, 37, 41,) with submission 36 suggesting that multiple pest or pathway specific RPMSs be created. Workshop 3 notes that partial review of strategies will have big benefits in changing how strategies are made and how RPMS are aligned. It was also noted that some RPMS are up for review in 2012 and how this fits with the national policy development, which needs further clarification.

Allowing parts not under appeal to become operative was supported by three submissions (23, 32,36). Submission36 also notes than an alternative to the Environment Court appeal should be considered with the regulations review committee being cited instead.

Amending the requirement for a full statutory review period was supported by six submitters (8, 10, 20, 26, 29, 37) and in workshop 2 it was noted that the review of pest management plans needs to be shorter than 5 years in the situation of endemic disease.

Additional ways to improve and simplify the process were given as

- Identifying all impacted parties. (29)
- Ensuring public interest group input. (36)
- The gatekeeper role for simplified solutions and landowner engagement. (40)
- Careful consideration of what should be included. (20)

Views on MAF (or others) regulating the movement of risk goods and crafts led to statements by nineteen submitters. (1, 4, 6, 7, 8, 10, 11, 13,15,18,20,23,25,28, 29, 30, 31, 35, 36). The majority of these were fully supportive of this proposal. One stated that is would be extremely difficult to manage with a high risk of failure, suggesting voluntary industry initiatives as an alternative (28). MAF was supported as the agency to prevent gaps in control (8, 10). Submission 30 highlights the need to include internal borders and to ensure that the pathway tool is accessible to all. Workshop 1 explored this issue concluding that pathway legislation will allow pathway measures to be put in

place where required. Workshop 3 recorded that there is a plan for a new tool to manage pest pathways.

The proposed changes to the Wild Animal Control Act and the Wildlife Act led to fourteen submissions. (1, 2, 4, 7, 8, 18, 19, 20, 30, 32, 36, 37, 38, 41) the majority of whom supported the changes. Additional comments included the need for DOC to have access to Biosecurity Act powers (30) and that DOC's current powers to control pests is not impeded (41). Pest management outcomes are requested to be the paramount driver (41).

Species requiring consideration are wallabies (30), trout and deer (41) and goats. (36) The conflict of values e.g. between hunters and conservationists was raised with a request that the NZ Conservation Authority be involved in the review process (41).

Workshop2 considered animals defined by some as pests and others as resource and how these would be dealt with without alienating parts of the community. Over the next four years it is proposed that a framework and process to aid decision making is developed and processes for having conversations about these issues needs to be reviewed. It was also noted that reviews of current legislation would be carried out by the Minister who owns the specific legislation and that there might be issues regarding the timing of these reviews.

2.2. Creating appropriate consistency

Three submitters made comments about the principles for central and regional council intervention (7,21,25). Submission 7 has 'significant concern' with the proposals and suggests that any proposals do not overcomplicate pest management, impose unnecessary costs and barriers or derogate from local community decision making. The functions of the LGA are also raised including local autonomy for decision making and the suggestion that guidance material would be more appropriate. National reporting requirements by councils will require an appropriate funding contribution. Submission 21 calls for transparent and open biosecurity practices and operations. Submission 25 notes that the necessary expertise exists within government agencies and that some issues that are currently not being addressed already fall within agencies' mandates.

The principles for who should fund what received three comments (7, 21, 26) The low threshold and inherent costs and difficulties associated with Board of Inquiry should be reviewed (7). Tendering processes need to include rigorous appraisal of fairness (21).

The proposal for national priorities for pest management received four comments (7, 25, 28, 30). These included the need to recognise the differences in scale (national/regional) and perceptions and realities of issues (7) and the inclusion of endemic diseases of livestock, including zoonotic organisms and resistance to control be included in the national priorities (25). Submission 28 questions how the priorities will be decided and submission 42 requests detailed criteria for national priorities. Submission 30 states that what is meant by national priorities is unclear and that such a list would not be supported as it is the way it is managed in a given situation which should determine the effort. At workshop 3 it was noted that national priorities are more about processes and decisions to ensure that correct decisions are made leading to consistent documents. Decisions will be made by the Minister but will be developed in consultation. The need to ensure that national policy direction doesn't remove regional autonomy was made at workshop 3.

The process for determining inclusion in national or regional strategies and biosecurity criteria led to four submissions (7, 25, 28, 30). Local autonomy and diversity within pest strategies is often appropriate. (7) Criteria needs to be up to date and reflective of stakeholder's needs (25). The use of scenarios is suggested (28). Consistency in prioritising site led management is suggested as well as prioritising new pests in a region or coordinating programmes between regions (30).

Mandatory testing of the value of pest management programmes and determining of requirements elicited 3 responses including the need for everyday pest management strategies of private

companies (35) and for MAF to further quantify 'value' and 'appropriateness'. (7). This process should only be required when there are costs or obligations imposed on others (30).

It was noted in workshop1 principles will be set for central/regional pest management including funding principles and national priorities and that the process for establishing national policy direction will include a range of parties. Workshop 3 notes that it will be a challenge to ensure that policy direction adds value, avoids duplication and improves decision making.

Other things for the national policy direction included:

- Increased public awareness and education. (4)
- Inclusion of Environment Bay of Plenty in policy direction development process. (6)
- Considering existing checks and balances within BSA. (7)
- The ability to implement strategies at a district level. (8)
- Inclusion of all stakeholders. (10)
- Standardisation and rationalisation of regulations regarding pesticide use. (11)
- Clarification of criteria and prioritising. (12)
- Regional PM Strategies are driven by different community perspectives, issues and solutions. Need to avoid unnecessary additional costs for Councils. (14)
- Inclusion of Environmental Codes of Practice. (18)
- Inclusion of AQNZ in the policy building team. (18)
- Legally binding aspects of this. (19)
- Regional Councils to act as good neighbours to each other. (20)
- Legislation and national directives should recognise the Treaty partner status of hapu and iwi. (21)
- Extending the good neighbour obligations to the marine environment. (31)
- Including affected industry groups. (37)
- Clarity over whether this will have a statutory basis. (41)
- Inclusion of a template for pest/pathway specific RMPSs and guidance to regional councils. (36)

Three submitters commented positively on the proposed amendment to the Ombudsmen Act. (7, 32, 41)

2.3. Shared System for Measuring Results

Six submitters commented on this proposal (19, 20, 24, 30, 40, 41)

One questioned if regulation was the best way of achieving this (19). One supported the proposal but expressed concern at the potential costs (20). One suggested the inclusion, after the first paragraph of "This framework would include performance measures relating to mātauranga Māori indicators of successful pest management" (24). Submission 30 noted that intermediate pest management outcomes may be the same, but NZ outcome varies. The need to measure whether the system as a whole is working by evaluating against the characteristics in table 3 is necessary. Binding agencies only and not other pest management participants (e.g. industry) will not provide information on the system as a whole and any system should therefore be limited to what is reasonable. The suggestion that such a system should be available to the public was also stated (40).

2.4. Expected effects of improved and simplified processes

Three submitters made comments regarding the expected effects. One noted that the promotion of consistency and improvement may be best achieved through the development of guidance material (7). One noted that cost-effective solutions to long-term pest management should recognise and allow for uncertainty (26), while another highlighted the need for programmes to be value for money and consider appropriate distribution of costs (30). The need for significant long term investment and expertise was raised in submission 28, which also questioned the availability of resources and capability and the need to link with science to keep current. Submission 31 notes that physical control tools are limited in the marine area so 'tools' needs wide interpretation.

3. Better and more accessible tools

The majority of submitters supported this proposal if applied well. It was stated that the toolbox needs to be not too general or lightweight (30) or to get suffocated under a leaden weight of bureaucracy (3). It also needs to prioritise as it cannot encompass controls of all pests effectively and provide information on how to use the tools cost effectively (20, 35).

Submissions 26 and 30 suggest that governance of the toolbox should be by a group of major stakeholders to drive the direction and to give the toolbox credibility.

The Animal Health Board (26), Councils (7) and Forest and Bird (36) expressed a wish to be included in the development of the tool box.

3.1. Developing integrated toolbox management

Submitters were very supportive of this on the whole, although some concerns were expressed such as extending to all facets of biosecurity as it is an overlap with the work of the Response Fund (19) and the costs of development and evaluation of tools (10). Submission 29 is cautious about potentially overly prescriptive and constraining tools requesting that tool development evolves with best practice, takes a first principles approach and borrows and learns from overseas experiences.

Another submission suggested inserting 'including the practical application of mātauranga Māori pest management tools and practices' (24).

Submissions 9, 30 and 36 requests that greater consideration be given to the formal learning needs of those involved in pest management with inclusion of education and training provision. The capability (knowledge, skills and tools) is seen as fundamental and the toolbox to be supported by research, including innovative and integrated management approaches (41).

Provision for a risk category for public perception and opposition is suggested in submission (1).

Submission 4 supports the toolbox as long as standards and regulations are met so tools can easily be used and are accessible to all parties. Submission 36 also requests that the toolbox includes manuals and field guides, a pool of physical tools that can be borrowed, volunteer coordination and management resources and PR, education and communication resources and tools.

Submission 40 requests that a public domain database is also included in the toolbox.

Increased surveillance was also raised (19, 41) including off shore.

Best practice guidelines were supported with submitter 30 suggesting that the governance group determine what best practice is.

Submitter 11 states that there are few appropriate tools for the aquatic environment and that there is a danger of replicating work already being done under the Biosecurity Science Strategy.

Submitters supported having all the tools accessible in one place.

The co-funded toolbox manager concept received support from fifteen submitters (1, 4, 6, 7, 8, 11, 14, 18, 19, 21, 28, 30, 31, 37, 40) with the majority supporting that the toolbox management resides in MAF. Other suggestions were that the manager received support from other agencies (21) or experts (40) or splitting the role depending on where capability and credibility lies for key components (30). Workshop 3 discussed the role of the toolbox manager who will not replace existing regulatory structures, but will influence how people are using the tools, what tools are needed and how to develop them.

Other suggestions given were

- Ownership of tools probably lies with the tool developers and agencies that carry out PM. (11)
- Some pest management strategies are trade secrets and will need to reside with the appropriate company/industry who owns them. (35)
- It is unlikely that MAF will have sufficient expertise for complex pest management systems. (35)
- Logical for Biosecurity NZ to co-ordinate but there must be involvement of all those with a vested interest. (41)
- Have recognised experts as knowledge contributors and key points of reference. (30)
- One or more Crown Research Institutes could be considered. (28)
- Governance of the toolbox will be by people who have investment in the development of the tools and who are contributing resources. Other people will be able to engage at a different level and there will still be opportunities for people to provide input. (W3)
- The future system will only be as good as those elements that work (W1)
- Practitioners who contribute to the toolbox need to benefit. Who gets what and who benefits is a hard discussion. (W2)
- The toolbox manager will address the registration of tools, best practice and help establish priorities for new tool development. (W3)
- Should the management function of the toolbox covers all biosecurity as well as pest management (W4)

3.2. Two-way capability building for effective tāngata whenua involvement

This was supported by 11 submitters with suggestions including:

- Establishing optimal communication pathways and linkages between Crown agencies, research providers and tāngata whenua .
- Using tāngata whenua planning documents (e.g. Fisheries Management Plans) as a starting point for planning and exploring devolving management of biosecurity issues to tāngata whenua (23).
- Submission 24 suggests including the statement “and the priorities for work to be completed could be set by MAF on the advice of the Māori Advisory Committee as detailed in 1.6.
- Submitter 30 notes that it is the responsibility of all agencies to engage with iwi and the public irrespective of statutory obligations.

- Submitter 39 suggests early involvement of and oversight by TPK to ensure that the material is not redundant in the final analysis.
- One submitter (29) questions the reference to tāngata whenua networks as the preferred pathway suggesting that benefits can be had from leveraging any interested party related to a given situation.
- Including tāngata whenua interests in NZ's 'best interests' and ensuring that mana whenua and kaitiakitanga is not over ridden when perceived pests are farmed or flourishing (e.g. pacific oysters) (21).
- Fully understanding Māori priorities and identifying current risks to taonga and culturally significant resources (19).

3.3. Expected effects

Three submitters made comments on the expected effects.

Submitter 3 asks about future tools to replace 1080 and to control rabbits. The issue of the effects of climate change on the efficacy of current tools and how this will be managed.

Reduction in costs of engaging with tāngata whenua may not be achievable, with face to face engagement the priority (30).

4. Acting Collectively

4.1. Leadership for engagement and cooperation

There were twelve submissions made about this proposal (6, 8, 18, 19, 20, 25, 26, 31, 35, 36, 37, 41). The majority of which supported the proposal. Submission 8 states that national direction is needed but middle management and the people on the ground will be the success of the National Pest Management Plan. The influence of social factors mentioned in the opening text is not reflected in the other sections of the plan (20).

Workshop 1 called for a better definition of the function of leadership.

The inclusion of the leptospirosis case study is supported in submission 26 along with a proposal for MAF to explore coordinating national forums to provide guidance to a range of stakeholders.

Submission 35 calls for strong input and leadership from industry on the setting of national policy direction and formalising industry bodies' roles in leading pest management strategies and incentivising industry to commit to collective action.

It was stated in Workshop 3 that the idea for regional forums was raised and rejected as many regions already have avenues for this.

4.2. Partnerships

The issue of partnerships was raised in eleven submissions (7, 11, 14, 20,21,23,25, 26, 29, 30, 31).

Partnership was explored in workshop 3 and how the decision to act collectively was seen to be within New Zealand's best interests and that developing better relationships could lead to better results from existing resources. Submitter 11 noted that collective buy-in was crucial to the success of pest management initiatives. Submissions 7, 14 and 31 note that much collective work is already occurring and this approach is supported but needs to be flexible and not over complicated. Much

greater engagement with communities and inclusion of those working in biosecurity conservation and restoration is important (20) as well as engagement with industry (29). Submission 21 questions who will determine “New Zealand’s best interests”? The best ways of engaging tāngata whenua and the community in the future are outlined in submission 23. Submission 26 supports effective cooperation particularly in the area of possum control and would be willing to be involved in such a process. Submission 30 suggests the use of the International Association for Public Participation principles as a foundation for public engagement and suggests including local priorities to the national and regional priorities proposed.

4.3. Improving support for collective action

Thirteen submitters made comments about this (1, 3, 7, 10, 25, 26, 27, 28, 29, 30, 35, 36, 37).

Submitters 10, 25, 26 and 27 are opposed to the inclusion of Government- Industry Agreements (GIAs) in the plan which they state may not proceed, (10) should not preclude alternative approaches to collective action, (25) and would risk losing the support of affected parties if imposed at a high level (26). Submission 37 believes there is scope for such GIAs noting that all affected stakeholders should be included.

Workshop 1 discussed Government Industry Agreements stating that there needs to be a focus on new NZ pests but GIAs can expand over time and importers should contribute more to the funding base. Workshop 2 also noted that the GIA project is proposing that industry could propose for a pest of interest and share costs of pest management.

The acknowledgement was noted at workshop 3 that lots of good work was happening at a site level which could be built on and that MAF are committed to leadership for collective action to come about.

Submissions note that the national integrated approach in the proposal should be reflected in appropriate funding streams (1), agreements (26) and operational implementation with industry (29). Submission 3 emphasises the need for better dialogue with research providers to inform future policy development.

Submission 35 notes that education/extension activities will play a key role in the effective uptake of pest management strategies.

The inclusion of industry (29) and Forest and Bird (36) in further discussions was requested.

4.4. Using a more collective approach for national pest management programmes

Three submitters (23, 26, 30) commented on using a more collective approach for national pest management programmes.

Submission 30 noted a range of existing national programmes where a collaborative approach is working. The Animal Health Board seeks to be fully engaged in decision making and cost sharing models (26). Submission 23 supports that costs and responsibilities need to be more equitable.

4.5. Expected effects of acting collectively

Submitter 4 supports acting collectively with the concern that this needs to be managed to reduce negative impacts on those already working in pest management who may perceive a loss of control.

5. The Plan of Action and process so far

The majority of submitters welcomed and supported the Plan of Action.

5.1. Contents and structure of the Plan

The **principles** of the plan elicited 15 comments, the majority of which supported the principles as outlined (1, 4, 6, 7, 8, 11, 19, 20, 21, 28, 29, 30, 32, 35, 37).

Submission 19 expressed concern that number 13 could push decisions back up the system. Submission 20 suggests that another principle should be included that addresses public/community consultation and engagement in decision making.

Submission 35 suggests that the principles need to be applied to private landowners and industry as well.

Submission 32 states that principle 3 is highly contestable and specious as it currently has no recognition in law. The same submitter suggests changing the wording of principle 6 to include 'and interests' after 'accountabilities' and questions the inclusion of 'rangatiratanga' in principle 9 stating that the current wording promises too much to iwi Maori.

Submission 1 suggested including 'outcome monitoring' to number 10. Submission 7 notes that several principles are value judgements and that they should underpin policy rather than be adopted as policy.

Submission 6 notes that the principles should be used by regional councils to guide the development of regional policy rather than adopted as formal policy.

The **key characteristics** generated seventeen comments, again broadly supportive of those proposed in table 3 (1, 4, 6, 7, 8, 9, 11, 12, 13, 18, 20, 24, 28, 30, 31, 35, 37, 41). Submitter 4 suggests the inclusion of land recovery to natural status. The 'sub components of the characteristics' are described as system requirements as opposed to policy (6). Submission 7 notes that cost effectiveness is not always the best approach and that number 19 could be expanded to include community. Submission 8 notes that at a theoretical level the characteristics are good but these need to be instigated at middle management level.

Submission 9 requests inclusion of specific education and training needs while submission 12 suggests a role in generating and actively seeking information.

Submission 13 highlights the problems of accessing control tools due to them being unavailable or constrained by other legislation. This submitter also proposed the need for a strong base of informed public support under section D. Submission 18 raises the issue of funding to achieve cost effective outcomes, including industry contributions.

Submission 20 states that pest management outcomes are likely to be identified at a strategic level rather than at implementation – number 2 and that uncertainty expressed under B is dealt with through Adaptive Experimental Management. The lack of a tāngata whenua specific comment under 'C: Effective' is raised in submission 24 and submission 28 asks who is responsible and will fund some of the characteristics. Submission 30 suggests clearly explaining the outcome approach, changing C to read 'Effective and efficient'.

Submission 35 suggests the inclusion of pests and diseases not found in national or regional strategies, including industry sector outcomes and that communication between parties may be limited by trade secrets for some sectors.

The proposed **outcomes** led to fourteen comments in submissions (1, 4, 7, 8, 11, 18, 20, 21, 24, 30, 31, 35, 37, 41).

The majority were supportive and the following additional comments were noted.

Submission 1 suggests adding a C category to the A and B row ‘Establishing National Priority Quarantine Sites’. Submission 4 suggests the addition of an outcome around review to take account of new information, techniques, or science. Submitter 8 states that number 8 will need to have more teeth and that in number 5, all parties have to be involved. The question of the definition of landowner, particularly in relation to the coastal marine environment is raised in submission 18.

Submission 20 states that lower level outcomes need to be SMART and for pest management programmes to have an external review process.

Other comments about the contents and structure of the plan were:

- The need for principles and outcomes to align with those of the whole biosecurity system. (4)
- The inclusion of explicit education and training need and provisions. (9)
- That the scope of what pest management is and involves and how it linked to the rest of the biosecurity system needs to be identified. (12)
- That pesticides are included. (13)
- That a definition about the impacts of new organism is included. (19)
- Not every pest needs to be included – there needs to be prioritisation. (20)
- That the vision needs to have buy-in and involve all parties including industry and communities to prevent it being ignored. (23)
- The need to include a Treaty of Waitangi clause to empower the new Biosecurity Act. (39)
- The absence of the objective of the policy – control or eradication. (W3)
- More emphasis on acting collectively than developing a more efficient and effective pest management system. (W3)
- The lack of case studies with native trees with case studies appearing industry focussed. (W4)

5.2. The Plan of Action

Four submitters made specific comments about other sections of the plan:

Workshop 4 noted that the diagram on p4 should rename ‘social’ outcomes as ‘societal’ outcomes to reflect cultural, economic and environmental as well.

Submission 7 notes that the proposed implementation timetable does not provide for the ongoing review of national policy direction or provide for new directives as should be amended to reflect lessons learned.

In submission 24 a comment is made about Appendix 1, stating that the role in determining who makes decisions rests with MAF advised in some way by the Maori Advisory Committee should be sufficient to cover tāngata whenua involvement. A further note is made regarding the implementation project structure diagram (fig 1) in work stream G where it is recommended that rather than have a tāngata whenua box, there is a tāngata whenua component through each project.

Submission 26 suggests it may be useful to have clearer discussion and framework around the use of National PM Strategies.

The need to describe greater commitment to evidence based scientific practices in PM is raised in submission 28.

5.3. The process to date

Comments about the process involved in the creation of the plan were included in thirteen submissions, with the majority being very supportive and acknowledging the work that has been done and the stakeholder workshops held. (4, 6, 7, 8, 10, 16, 18, 23, 25, 26, 36, 38, 41). Additional comments were

Submission 7 which notes that the Plan fails to demonstrate an understanding of the role of Councils and the relationships they have with their community.

Other affected parties must be engaged in the development of national policy direction from its inception. Development of the plan by Crown landowners and regional councils with a public consultation phase is inadequate (10).

Better planning around engagement with tāngata whenua and communities in the future to ensure engagement continues to improve is suggested in submission (23).

Disappointment at the lack of involvement of environmental or conservation public interests \ groups in the process so far (36).

The need to work closely with the Department of Conservation to highlight their significant role in pest management (38).

More emphasis should be placed on the role of community organisations and public input (41).

Workshop 3 noted that community groups needed to have input into the process to ensure their values are reflected, particularly around funding decisions and that several avenues of funding were currently available and would remain.

Workshop 1 notes that there is a need to consult public/private more than has occurred to date, that the submission period is too tight. It was noted that the timing is driven by the opportunity to include recommendations into the Biosecurity Act review.

Workshop 2 records that the process has dealt with the concerns of the Minister of Local Government, and the Minister of Conservation and that bilateral meetings have been held to work through more difficult issues.

5.4. The Analysis document

The supporting document “Analysis completed to make a plan of action for better pest management in New Zealand” was the subject of three comments.

Submission 7 notes that previous work by the BCRF and section 5 of the analysis grouped functions around leadership and oversight which was simple and clear. The expanded functions in the Plan of Action have resulted in wording that is open to interpretation. This submitter assumes that reference to “any rule in a strategy that is not aligned with the national policy should have no effect” means no effect on the Crown as opposed to no effect at all.

Submission 23 notes that the accompanying Analysis document reads more like a ‘rule-setting-type’ plan that the Action Plan, which reads like a discussion document. Submission 24 includes a rewritten version of section 9 – Tāngata whenua perspectives.

Workshop 2 signals that appendix 4 looks at the criteria for assigning decision makers and how decisions might be made.

6. Funding

The issue of funding was raised in thirteen submissions. (1, 11, 16, 18, 20, 26, 28, 34, 35, 36, 38, 40, 41, W1, W2, W3)

Comments made were:

- Funding will be the key to achieving an integrated accountability approach. MAF should lead and prioritise the financial budgeting process at both national and regional levels. (1)
- Underpinning the key characteristics with relevant, directed and responsive research supported through a stable funding environment. (11)
- Concern about sources for funding of enhancing biosecurity and if increased funding would rest with industry. (16)
- The importance of funding for regional pest management bodies such as the Top of the South Biosecurity partnership. (18)
- Where funding for implementation and science will come from and acknowledging in the plan that without additional money many of the goals in the document will not be achieved. (20)
- Funding needs to be raised from a number of parties at a nationwide level. National policy development should take account of the need for surety of funding through Biosecurity Act levies. (26)
- Who will fund key characteristics 3, 5, 7-11 and who will be responsible for capacity/capability retention? (28)
- MAF does not understand the funding environment in which local government operates. Assigning responsibility will not necessarily lead to extra funding which is based on the views of communities during Annual Plan and LTCCP processes. (34)
- National priorities for pest management need to identify research priorities and provide vehicles to fund them. (35)
- Binding the Crown to RPMSs in the absence of NPMSs will result in scarce funding being transferred from national objectives to local ones. (36)
- Concern that DOC is not resourced to meet good neighbour obligations and that funds may be diverted from other conservation projects. (38, W1)
- Landowners look forward to government departments supporting pest management. (40)
- DOC as the nations' largest landowner receiving funding for "Good neighbour" concept from Vote Biosecurity, not baseline funding. (41)
- Funding arrangements for toolbox management seem inflexible and should include industry. (42)
- The Minister has said that there isn't any more money and that resources have to be used more effectively. (W2)
- The FOPM process is about how people are enabled to make more effective decisions on where resources can be applied. (W3)

7. Wider Context

Several submissions suggested further exploration of the interface of the Pest Management Proposed National Plan of Action in the wider context. (3, 4, 10, 11, 12, 14, 18, 19, 20, 21, 22, 23, 24,25, 26, 27, 28, 34 ,37, 39, W1, W3, W4)

These included:

- The wider biosecurity system including border biosecurity, and wider operational plans such as the Top of the South Island Marine Biosecurity partnership. (4, 12, 23,28)
- Scientists and research providers. (3, 11, 28)
- Education of the wider community.
- The Local Government Act – council responsibilities and processes. (7,14, 34)
- Foreshore and Seabed legislation. (18,22,24)
- The Biosecurity Science Strategy and Surveillance Strategy. (19, 20,24, 25, W1, W4))
- Treaty Settlement legislation. (21,39)
- Māori Fisheries and Aquaculture Settlement. (24)
- The Big Game Council. (23)
- Government Industry Agreement Project .(10,25,26, 27,37)
- TB Strategy. (26)
- New legislation for managing the environmental effects in the EEZ. (15)
- Iwi /hapu planning documents. (24)
- Phase 2 RMA implementation (W1)
- Sport fish/aquatic pests/marine pests review (W3)

Submissions

- 1 N Shore City Council
- 2 Environment Waikato
- 3 AgResearch Ltd
- 4 Assure Quality
- 5 Thames Landcare Group
- 6 Environment Bay of Plenty
- 7 LGNZ
- 8 Banks Peninsula Pest Liaison
- 9 Agriculture ITO
- 10 Dairy NZ
- 11 NIWA
- 12 MAFBNZ Surveillance Group
- 13 USB Forest Sciences
- 14 Gisbourne District Council
- 15 Seafood Industry Council
- 16 Nursery and Garden Industry Assoctn
- 17 Reihana Robinson
- 18 Aquaculture NZ
- 19 MAFBNZ
- 20 Landcare Research
- 21 Ngati Kahungunu Iwi Inc
- 22 Francene Wineti
- 23 Cheri van Shravendijk
- 24 Maximise Consultancy
- 25 Beef and Lamb NZ
- 26 Animal Health Board
- 27 Deer Industry and Deer Farmers Asstn
- 28 AgResearch
- 29 Fonterra
- 30 DOC
- 31 Min Fish
- 32 NZ Deerstalkers Assn
- 33 Horizons Regional Council
- 34 West Coast Regional Council
- 35 Plant and Food Research
- 36 Forest and Bird
- 37 Federated Farmers
- 38 Southland Conservation Board
- 39 Nga Whenua Rahi
- 40 Pukaki Downs Station
- 41 NZ Conservation Authority
- 42 MAF Biosecurity staff
- W1 Workshop - Christchurch
- W2 Workshop - Wellington
- W3 Workshop - Auckland
- W4 Workshop - Tangata Whenua