

**From:** Environment Canterbury  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposal for the Canterbury RPMP Plan [#49]  
**Date:** Monday, 3 July 2017 1:34:43 p.m.

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Please tick those that apply	<input type="checkbox"/> I do wish to be heard in support of my submission; and if so,

#### Your submission on the Proposal for the Canterbury Regional Pest Management Plan

The RPMP is an important document to set the strategy for pest management in the region. As stated in 1.1 “Regional councils have a mandate under Part 2 of the Biosecurity Act 1993 (the Act) to provide regional leadership in activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in their region.”

Pest management is important for biodiversity reasons as certain pests have a significant impact on our native species. Declaring feral cats, mustelids and rats as organisms of interest rather than pests does not show regional leadership for predator control. Organisms of Interest don’t have a clear plan on how these will be managed. We believe feral cats, mustelids and rats should all be included in the RPMP as site-led pests. These predators have a catastrophic effect on our native birds, lizards and other animals.

We note that under 4.2 it stats “Ools are not accorded pest status but future control of them could arise, for example through Site-led programmes. A review of the Plan may be necessary to include them as pests.” It is almost certain that these predators will need to be (and are currently) controlled for biodiversity in certain sites around the region. We therefore would suggest to include them as pests now to save rework of the RPMP at a later date.

In July last year the Government announced the Predator Free 2050 programme to rid New Zealand of possums, stoats and rats. The Government is seeking to support large-scale collaborative predator control projects. Canterbury has a number of sites that are potential projects and we encourage ECAN to help support large scale predator control projects. Including feral cats, mustelids and rats as pests in the plan helps support this.

Feral cats require a clear definition for any cat control to occur. Cats are the one pest that are also a common pet. Therefore it is necessary to be able to tell the difference between an owned cat and an unowned cat. We suggest the addition of a definition. A suitable definition would be “a feral cat is a cat without a microchip, collar or harness.” This would allow cat control to occur near populated areas without the risk of harming any owned cats.

Not only are cats a biodiversity pest they are a primary production pest spreading toxoplasmosis to sheep. Farmers currently immunise their sheep but immunisation is not 100% effective and “toxos storms” can still infect flocks resulting in a significant loss of livestock and foetuses.

We are concerned that the Good Neighbour Rules do not apply to possums (Table 3, p14). We believe that a land occupier should be required to keep a minimum of 10% residual catch rate within 500m of their boundary to protect production and indigenous and biodiversity values.

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