

Proposal for the Canterbury Regional Pest Management Plan

Under the Biosecurity Act 1993

Staff Recommendations Report

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Purpose of Report

By Minute 1, dated 25 July 2017, the Hearing Panel directed Council Staff to prepare a Staff Report on the Proposal for the Canterbury Regional Pest Management Plan (PRPMP), containing:

- A summary of the key themes raised in submissions.
- A summary of the legal framework in the Biosecurity Act 1993 (the Act or BSA) for making a regional pest management plan.
- A summary of the submissions received on the PRPMP highlighting key issues raised in submissions, including staff recommendations in response to each submission.
- A further assessment against the consultation requirements in section 72 of the Act, following the Council meeting on 25 May 2017.

This report addresses the first two matters in the narrative of the report, together with some further context for some issues raised in submissions, and attaches the summary of submissions received on the PRPMP, together with staff recommendations, in Appendix 1. Further consultation on the PRPMP is also addressed, in Appendix 2.

Introduction

The Proposal for the Regional Pest Management Plan (PRPMP) was publicly notified on 3 June 2017 for a period of submissions closing on 3 July 2017. A total of 90 submissions were received addressing a range of matters. Staff were appreciative of the constructive comments and suggestions for improving the PRPMP and pest management outcomes for Canterbury.

The key themes raised in the submissions included:

- requests for additional pests to be included in the RPMP;
- general comments on the structure or content of the PRPMP (excluding pest and funding comments);
- comments specific to pest provisions outlined in the PRPMP;
- specific comments on gorse and broom, wilding conifers, Bennett's wallaby, Russell lupin; and
- specific comments on funding.

Legal framework for making a regional pest management plan

A detailed outline of the planning and statutory background is provided in Part One of the PRPMP. The following summary provides a brief overview of the process for developing a Regional Pest Management Plan under the Biosecurity Act 1993 (the Act) for the purpose of assisting the Hearing Panel and submitters.

[Canterbury Regional Pest Management Plan](#)

The purpose of the RPMP is to assist Environment Canterbury in carrying out its regional leadership role in accordance with section 12B of the Act to prevent, reduce, or eliminate adverse effects from harmful organisms that are present in New Zealand.

The PRPMP has been produced as part of the review of the existing Canterbury Regional Pest Management Strategy 2011-2015 which will be revoked and replaced by the Canterbury Regional Pest Management Plan in accordance with section 100D(7) of the Act.

Biosecurity Act 1993 and Biosecurity Law Reform Act 2012

The Biosecurity Law Reform Act 2012, together with the provisions of the National Policy Direction 2015 (NPD), introduced new requirements as to the content of regional pest management plans and the process by which they are developed. Accordingly, the PRPMP has been developed in a manner consistent with the Act and the NPD.

Process for making a regional pest management plan

Part 5 of the Act sets out a six-step process that must be followed when making a regional pest management plan (set out in sections 70 to 75 of the Act¹). These steps are set out in full in Appendix 4. A summary of the steps is set out in Table 1 below.

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

Prior to public notification of the PRPMP	S70, First step	Plan is initiated by a proposal (s70 prescribes the matters that must be set out in the Proposal)	Council resolution on 25 May 2017
	S71, Second step	Satisfaction on requirements (matters the Council must consider and be satisfied with when it approves the Proposal)	Council resolution on 25 May 2017
	S72, Third step	Council is satisfied with consultation, or requires further consultation to be undertaken (for example through public notification of the Proposal)	On 25 May 2017 Council directed that the PRPMP be publicly notified for submissions.
Public notification of the proposal, receipt of submissions			3 June to 3 July 2017
Hearing of submissions			September 2017
After public notification and the hearing on the PRPMP	S72, Third step	Hearing Panel is satisfied with consultation	Following hearing
	S73, Fourth step	Approval of preparation of a plan and decision on the management agency (the Hearing Panel issues a Minute)	Following hearing

¹ Sections 70 to 75 of the Act are set out in full in Appendix 4.

	S74, Fifth step	Satisfaction on contents of the plan and requirements (the Hearing Panel issues a Minute)	Following receipt of draft Plan
	S75, Sixth step	Hearing Panel recommendations to Council on submissions and the plan (Recommendations Report). Council makes decision on plan.	Following receipt of draft Plan

The Council made several resolutions at its meeting on 25 May 2017 in satisfaction of the first two steps in the process described above. In order to satisfy these first two steps, an assessment of the PRPMP against the requirements of sections 70 and 71 of the Act was provided to the Council. This report has been made available on the Council's website and is attached to this report as Appendix 3.

In relation to the third step, a Stakeholder Engagement Summary Report summarising the consultation undertaken on the PRPMP was provided to the Council. Again this was made publicly available and an updated version is attached to this report as Appendix 2. The Council directed that further consultation be undertaken on the PRPMP given that there are likely to be members of the wider public potentially affected by the Proposal that have not yet been consulted. The PRPMP was notified on 3 June 2017 for a period of submissions until 3 July 2017.

The Hearing Panel will now hear submissions on the PRPMP. The hearing will commence on 11 September 2017 with an opening presentation from the Council.

Following the hearing, the Hearing Panel will undertake the third to fifth steps of the plan making process. It will then make recommendations to the Council as part of the sixth step, as outlined in Table 1 above. These steps are set out in further detail below.

Third step

As the Council directed that further consultation be undertaken on the PRPMP, the Hearing Panel must be satisfied that appropriate consultation has been undertaken (in accordance with section 72 of the Act) and that the issues raised in consultation have been considered (in accordance with section 73(1)).

Under s72(1) of the Act, the Panel is required to be satisfied:

- (a) *that, if Ministers' responsibilities may be affected by the plan, the Ministers have been consulted;*
- (b) *that, if local authorities' responsibilities may be affected by the plan, the authorities have been consulted; and*
- (c) *that the tangata whenua of the area who may be affected by the plan were consulted through iwi authorities and tribal rūnanga; and*

- (d) *that, if consultation with other persons is appropriate, sufficient consultation has occurred.*

If the Panel is satisfied that sufficient consultation has occurred with other persons as required by subsection (1)(d), the Panel must have regard to the following under section 72(2) of the Act:

- (a) *the scale of the impacts on persons who are likely to be affected by the plan; and*
- (b) *whether the persons likely to be affected by the plan or their representatives have already been consulted and, if so, the nature of the consultation; and*
- (c) *the level of support for, or opposition to, the proposal from persons who are likely to be affected by it.*

Fourth step

If the Panel is satisfied as to the consultation that has been undertaken and is satisfied that the issues raised in all the consultation undertaken on the PRPMP have been considered, then the Panel may take the fourth step of making a plan, which is to approve the preparation of a plan. The Panel will confirm by way of Minute following the hearing whether it is satisfied as to the consultation that has taken place and will issue directions regarding the preparation of a plan.

Section 73 of the Act sets out the matters that the plan must specify and what a plan may include, including rules. Sections 73(5) and 73(6) set out the purposes for which a rule may be included in a plan and to what, when and where a rule may apply. Section 73(6)(d) provides that a rule may specify that a contravention of the rule creates an offence under section 154N(19).

When approving the preparation of the plan, the Hearing Panel must apply section 100 to decide which body is to be the management agency. It is proposed that Environment Canterbury be the management agency.

In deciding which body is to be the management agency, the Hearing Panel must take the following into consideration:

- (a) *the need for accountability to those providing the funds to implement the plan; and*
- (b) *the acceptability of the body to –*
 - (i) *those providing the funds to implement the plan; and*
 - (ii) *those subject to management provisions under the plan; and*
- (c) *the capacity of the body to manage the plan, including the competence and expertise of the body's employees and contractors.*

Once the Hearing Panel approves the preparation of a plan and makes appropriate directions, a draft Canterbury Regional Pest Management Plan (**draft Plan**) will be prepared by Council staff and provided to the Hearing Panel in accordance with sections 73 and 74 of the Act. A further Staff Report will be prepared by Council staff to accompany the draft Plan. This Staff Report will

assess the draft Plan against the requirements of sections 73 and 74 of the Act and respond to matters raised by the Hearing Panel and submitters in the hearing. The draft Plan and Staff Report will be made available on the Council's website.

Fifth step

Following receipt of the draft Plan, the Hearing Panel will undertake the fifth step in the process which is to satisfy itself on the contents of the draft Plan under section 73 and the requirements of section 74 of the Act. The Hearing Panel will issue a further Minute addressing these matters.

Sixth step

Finally, the Hearing Panel will prepare a written report under section 75(1) of the Act setting out its reasons for accepting or rejecting submissions received on the PRPMP and its recommendations to the Council on the draft Plan (**Recommendation Report**).

The Recommendation Report will be provided to the Council and the Council's decision on the Plan will be publicly notified in accordance with section 75(4) of the Act.

Environment Canterbury's Biosecurity Approach

Environment Canterbury's biosecurity programme is important to the region, given the threats posed by pests to our extensive rural community and natural environment. Within this programme, the Canterbury Regional Pest Management Strategy 2011-2015 has provided the regulatory framework and primary funding mechanism for managing pests since 2005 (first adoption of the Strategy).

Substantial changes to the Act in 2012 require Environment Canterbury's next document for managing pests to be called a regional pest management plan rather than a strategy. These changes to the Act, together with the National Policy Direction for Pest Management issued in 2015 (NPD), introduced new requirements as to the content of regional pest management plans and the process by which they are developed.

The RPMP will replace the Strategy as the regulatory component of the wider biosecurity programme. This is just one tool in achieving smarter pest management in Canterbury. The wider biosecurity programme also includes non-regulatory methods, including incursion response, working with other groups and agencies, participation in research projects, pathway management (including on-farm-biosecurity), project and community support, and biological control projects.

Key issues arising in submissions

Submitters have raised a wide range of issues, many of which relate to the provisions and matters in PRPMP, as well as some matters that are outside the scope of the RPMP.

Three key provisions of the Act and the NPD were mentioned by submitters across a range of pests. Staff consider that it may be useful to provide some background regarding these. These include pest agents, exemptions, and Good Neighbour Rules.

Pest agents

Once an organism is included in a programme in a RPMP, it has pest status and cannot be propagated, communicated or sold². These controls can pose a problem if the organism is also being used for a commercial purpose.

'Pest agents' may also be regulated under the Act without nominating these organisms, which may be used commercially, as pests.

The Act defines a pest agent as *any organism capable of (a) helping the pest replicate, spread, or survive; or (b) interfering with the management of the pest.*³

² Sections 52 and 53 prohibit the selling, propagating, breeding, or multiplying (see Biosecurity Act for full provisions)

³ Biosecurity Act 1993, part 1, s 2, page 21

Submitters have sought regulatory control of Russell lupin, feral goats, Douglas fir and Pinus radiata as pest agents.

To specify an organism as a pest agent, there must be a pest that the pest agent is capable of helping replicate, spread or survive, or a pest that the pest agent is capable of interfering with the management of. This could involve declaring the wilding form of an organism as a pest (for example wild Russell lupin) and require management of a Russell lupin pest agent (the cultivated parent plant).

Pest agents are also discussed further in the context of wilding conifers on page 12.

Exemptions

Some submitters raised concern over the application of the rules in situations where the pest is used for another purpose, or might be otherwise controlled or managed. Specific situations include using gorse and broom as a nursery crop to regenerate native vegetation, forestry situations where closed canopy will suppress pests, and the use of gorse and broom for beekeeping purposes. Rather than recommending changes to the rule framework for these types of limited situations, staff consider that the Exemption process provided for in the Act is a more appropriate mechanism to address these matters on a case by case basis.

The Exemption process is detailed in section 8.3 of the PRPMP and may be used by the Council in certain circumstances to exempt a person from a requirement in a rule, on conditions that the council considers appropriate.

One of the key considerations is whether the RPMP's objectives will still be met. The Exemption process also allows the Council to assess each situation individually and discuss the best ways to manage the pest to ensure the objective is met. This enables the Council to apply conditions based on the situation, so long as these are not more onerous than what is required by the rule.

Good Neighbour Rules

Good Neighbour Rules (GNRs) are a new mechanism available to regional councils, provided through the National Policy Direction (2015). This is the first time that regional councils have been able to require the Crown to comply with pest management rules designed to address the effects on neighbouring land. There are specific criteria for how GNRs are to be used in RPMPs. GNRs can only be used to manage pest spread across a property boundary (not for management within a property) and the neighbour must be taking reasonable steps to manage the pest on their land.

In some cases the Council proposes to apply a rule to require management across a property, or require boundary control regardless of steps taken by a neighbour. Where GNRs are proposed, an additional rule is included to satisfy the requirements of the NPD, but not limit the application of the standard internal and/or boundary rules. For example, three rules are proposed for old man's beard:

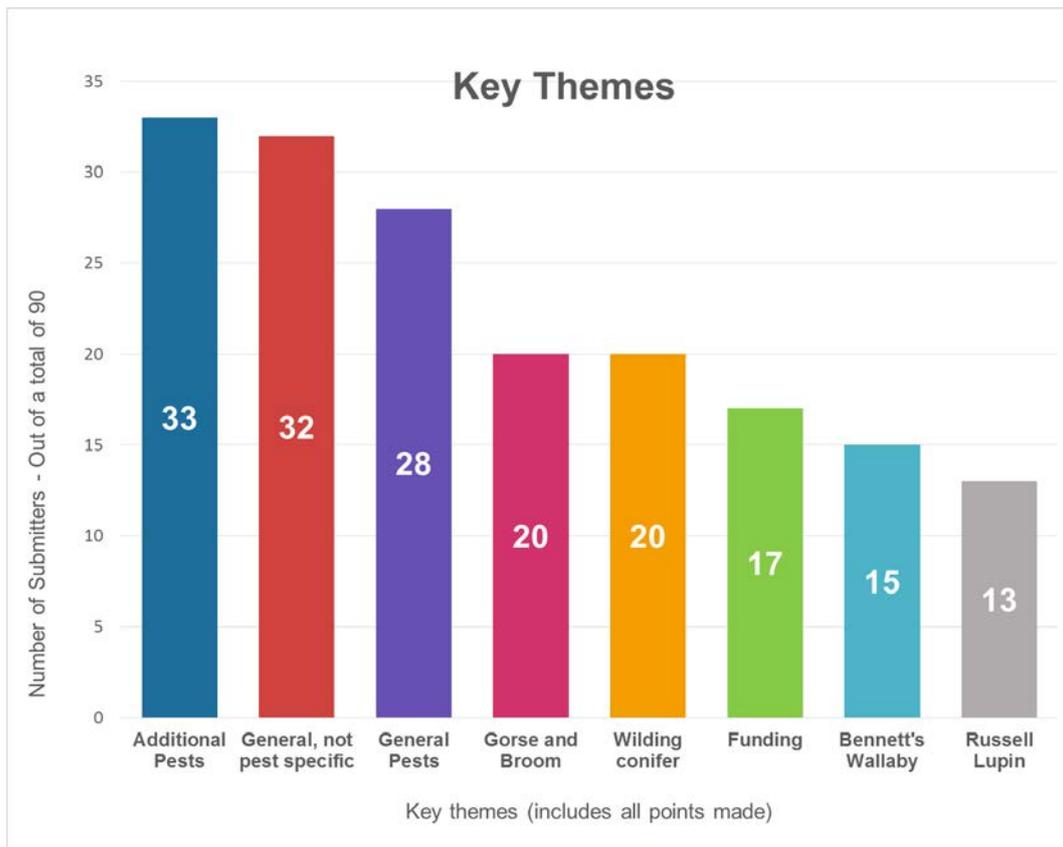
6.4.18 – requiring occupiers to destroy all infestations covering up to 100 square metres

6.4.19 – Good Neighbour Rule – requiring occupiers, upon written direction to destroy infestations within 20 metres of adjoining properties where that occupier has/is clearing old man’s beard.

6.4.20 – requiring occupiers to destroy infestations within 20 metres of adjoining properties.

This has caused some confusion to submitters, and in the case of Bennett’s wallaby, staff recommend clarification in the ‘Explanation of rule’ section.

Key themes arising in submissions



Requests for additional pests

33 submitters requested that additional organisms be included in the RPMP, either in region-wide programmes (exclusion, eradication, progressive containment or sustained control), in site-led programmes, or in the Organisms of Interest list. Russell lupin was the most commonly mentioned, followed by cats, goats, sycamore, and feral pigs.

In many cases sufficient information was not provided to enable staff to recommend inclusion in the RPMP. In these cases, staff have recommended that site-led programmes could be considered if detailed information on the distribution of the organism/s, the extent, the area to be controlled, the values to be protected, objectives for the programme, and consideration / consultation on funding arrangements is provided. Very few submitters suggested organisms that staff would dismiss without further consideration if more information was provided.

Some submissions relate to organisms that the Council is undertaking control on but do not require rules or regulation, for example, feral goats on Banks Peninsula. There is regulation for feral goats under the Wild Animal Control Act 1977 (administered by the Department of Conservation) and staff do not consider that further regulation is required in the RPMP. Comments have been made that the Wild Animal Control Act is difficult to administer. Staff do not consider this sufficient grounds to develop duplicate regulation, but would encourage or support changes to that legislation (if required).

Staff have recommended that some organisms⁴ are added to the Organisms of Interest list, as they warrant further surveillance and may be considered for site-led or non-regulatory programmes in the future.

Four submissions concerned marine pests. This is not an area Environment Canterbury has addressed in the Proposal. Marine biosecurity is led at a national level by the Ministry for Primary Industries (MPI) with an emphasis on prevention, detection and immediate response. Other regional councils are taking a more active role in this area and further work would be required in Canterbury should marine pests be included in the plan. Further evidence and discussion through the hearings will greatly aid staff in developing a recommendation. Ahead of this, we consider that an initial scoping exercise may be required before either a regulatory or non-regulatory programme is considered.

For new pests to be considered for inclusion in the RPMP, there are a number of factors to consider:

- funding arrangements, whether this could be managed outside the RPMP with joint partner funding
- threat and the impact of the organism
- “pestiness” of the organism
- incidence, how widespread it may be, how prone Canterbury is to the organism
- tools that are available for control
- objective for management of the organism and whether this is achievable
- principal measures, and how the objective will be achieved
- rules, if there are actions occupiers could take – depending on tools and skills required
- cost benefit analysis.

General comments

Many submitters commented that they were supportive of some element(s) of the PRPMP, and very few stated outright opposition to the PRPMP. Submitters commented on operational and implementation activities, including the way the rules are enforced, the method of undertaking pest control (for example, the use of poisons) and the use of biological control. Other comments related to the way that the Council works with partners and the community. The inclusion of Good Neighbour Rules were supported, with Crown agencies (MPI), the Department of Conservation

⁴ Rowan, silver birch, spur valerian, pigs ear, mayten, brown bull-headed catfish, Canada goose, Senegal tea, parrot’s feather, sulphur-crested cockatoo

(DOC), and Land Information New Zealand (LINZ) recommending changes to ensure these meet specific requirements in the NPD.

General Pests

This category covers all comments relating to pests that were proposed in one of the five programmes (exclusion, eradication, progressive containment, sustained control and site-led), it also includes comments where a submitter has made a statement mentioning multiple pests. However, pests most frequently mentioned in submissions (gorse and broom, nassella tussock, wilding conifers, Bennett's wallaby) are dealt with in separate sections below, together with comments relating to funding.

There were some general comments relating to supporting the direction of the PRPMP, and pest management in waterway margins. Specifically, old man's beard, Chilean needle grass, and feral rabbits were mentioned.

It is interesting to note that while many submitters were seeking additional organisms to be included in the RPMP, largely for biodiversity reasons, very few comments were received on the existing pests which are managed primarily for biodiversity reasons.

Gorse and Broom

Gorse and broom were the pests that received the most comments. The mix of comments related to the rule provisions and included situations that do not fit with the rule.

Many submitters sought amendments to the rules. Generally this was to cater for beekeeping purposes, using gorse and broom as a nursery crop to regenerate native vegetation, or in forestry situations. There were some opposing comments on the gorse and broom rules, with submitters either seeking to strengthen or remove, or greatly modify the rules. As a result of this, there were a fewer number of submitters that stated explicit support for the rules.

Four submitters commented on the use of gorse and broom as a nursery crop. Staff accept that in some circumstances the use of gorse and broom as a nursery crop is unlikely to conflict with the objective to keep land clear of gorse and broom and prevent adverse effects on production and economic well-being. It is accepted that the native growth would, over time, suppress the gorse and broom and achieve the objective. However, this will depend on a number of factors, including the land use and potential impact on neighbours. Staff consider that the Exemption process in the Act is a more appropriate mechanism to consider this activity on a case by case basis, rather than including an exclusion in the rule. Staff have recommended including an Advice Note to provide greater awareness of the exemption process for this use of gorse and broom.

Wilding Conifers

Only three submitters commented that they oppose the wilding conifer provisions. There were many comments regarding the drafting of the rules and suggestions to make these clearer. Four submitters sought that a Good Neighbour Rule be considered for wilding conifers, which staff recommend is added as an additional rule.

Some submitters also sought the inclusion of Douglas fir and *Pinus radiata* in the RPMP, with some suggesting these are included as pest agents. Staff note that Douglas fir in particular, releases considerable seed and can exacerbate wilding conifer spread. These species were not included in the PRPMP due to the economic value they provide. To declare these species a pest would be overly prohibitive to the forestry industry. The Ministry of Primary Industries' guidance to regional councils has excluded both of these species stating that they are highly valuable commercially grown species that contribute significantly to forestry exports. Both Rayonier and Selwyn District Council noted explicit support for not including these species in the list of named pest conifers.

Staff acknowledge that inserting pest agent rules in order to manage wilding conifer spread from plantation Douglas fir would be a significant tool to achieve progressive containment in the Wilding Conifer Zone (Map 1, Appendix 3 of the PRPMP). The intention to develop a management framework for plantation forests was included in the narrative section of the progressive containment programme and staff have considered this further following the receipt of submissions.

However, there are constraints to this. Territorial authorities manage plantation harvesting and planting through their district plans and the new Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 (**the NES for Plantation Forestry or Regulations**) have since been issued in the NZ Gazette on 3 August 2017. The regulations come into force on 1 May 2018.

The NES makes controls for planting and replanting of plantation forestry and makes certain forestry activities permitted, controlled, restricted discretionary or discretionary in regional and district plans. Where resource consent is required, the relevant matters of discretion include the level of wilding tree risk and the mitigation proposed to restrict wilding conifer spread, including the species to be planted.

It controls afforestation and replanting and uses the wilding tree risk calculator, erosion susceptibility classification and setback distances to determine the appropriate activity status. The regulations will generally prevail over regional and district plans that apply to plantation forestry, as regional and district plan rules cannot be more lenient than the regulations. A district or regional plan rule cannot be more stringent than the regulations unless the regulations expressly provide for this. The regulations allow plan rules to be more stringent in certain circumstances, where they:

- give effect to the National Policy Statement for Freshwater Management and specified policies in the New Zealand Coastal Policy Statement;
- recognise and provide for the protection of outstanding natural features and landscapes from inappropriate use and development or significant natural areas; or
- manage specific unique and sensitive environments.

Section 69 of the Biosecurity Act 1993 provides that to the extent to which a regulation made under the Biosecurity Act 1993 or any other Act is inconsistent with a rule in a regional pest management plan, the regulation prevails. Therefore, given the introduction of the NES for

Plantation Forestry, the Council is limited in how it can manage the planting of plantation forestry through the RPMP without creating unnecessary duplication.

Staff have noted they would find benefit in hearing further evidence during Hearings to understand how submitters envisage a pest agent rule applying to forestry situations.

Waimakariri Ecological and Landscape Restoration Alliance submitted that the Council should be seeking to achieve an eradication objective for wilding conifers. Staff note that a progressive containment objective is consistent with that of the National Wilding Conifer Control Programme. While areas within the Wilding Conifer Zone may result in an eradication outcome, this approach is not considered to be possible over the entire zone over the 20 year duration of the plan. There are areas of planted conifers and forested plantations that will require continued management.

Funding

Submitters commented widely on the funding formulae proposed in the PRPMP. The Cost Benefit Analysis (CBA) undertaken to support the Proposal identified the exacerbators and the beneficiaries of pest control and inaction (the result of not controlling a pest), and provides recommendations for where the costs should lie. This has resulted in a significant change in the funding splits between the regional community and occupiers for some pests. The term 'occupiers' is used in a general way in the PRPMP and the detail of how the rating or direct costs are met is to be discussed as part of the Council's Long Term and Annual Plan processes. This is to enable flexibility for the funding mechanism over the 20 year life of the RPMP. The Long Term Plan process is consulted on and enables the community to provide regular (three yearly) input into how the Council funds its programmes. Currently there is a mix of occupier rating mechanisms applied for pest management, rural targeted rates, pest district rates, a general rate, and direct occupier cost to undertake control. The CBA recommends cost allocations separately for control and inspections.

Nassella tussock

The key issue raised in these submissions relates to the change in the inspections funding split applying to nassella tussock (from 50% occupiers (within pest districts) and 50% regional community), to 75% occupiers and 25% regional community. Eight submitters strongly objected to this change and requested reverting to the existing 50-50% split. Staff support the CBA's analysis and allocation of costs for nassella tussock, and do not recommend accepting this request.

Nassella tussock is primarily a production pest, with some biodiversity impact. Control is arranged and fully paid for directly by occupiers, as exacerbators. They are beneficiaries of control within their own property and where it spreads beyond the boundary it imposes a cost on neighbouring properties. It is appropriate that control is paid 100% by the land owners. This arrangement also encourages efficient and effective control.

The benefits of inspection accrue more widely but remain primarily with rural occupiers in areas prone to Nassella. Occupiers derive a benefit in that inspection staff may identify plants that have been missed in control operations and remove isolated plants if efficient to do so. Neighbouring properties receive the benefit of ensuring effective control, minimising the risk of spread to their

own properties. These are the primary benefits and reflect the 75% funding contribution from the targeted rate in the pest district.

There are some biodiversity benefits from ensuring effective control has been undertaken. These are estimated as less than the production benefits and reflected in the 25% contribution from general rates.

Staff recommend that a review is undertaken under the Long Term Plan review (2018) to consider the best rating mechanism for nassella tussock, for example whether applying this rate to the pest district is appropriate, or if a wider rate on rural land may be more appropriate due to the regional benefit of stopping spread to Central and South Canterbury.

Comments were received noting that there should be a more even spread of costs across occupiers and the regional community for a number of pests, primarily nassella tussock, Chilean needle grass, feral rabbits, gorse and broom.

Submitters also sought recognition of the benefits to biodiversity of control undertaken by occupiers. Where there are biodiversity or wider benefits involved in pest control, this is proposed to be managed via a proportion of costs to be funded by the regional community.

Bennett's Wallaby

16 submitters commented on the management of Bennett's wallaby. All submitters were in favour of Bennett's wallaby being included in the PRPMP, and generally sought that the Council seek greater reductions than a sustained control objective, or that more is done to implement the programme.

The Ministry for Primary Industries, the Department of Conservation, and Land Information New Zealand have requested amendments to the rule to include a specified distance from the boundary in which control must be undertaken in order to meet the requirements regarding spread in the NPD. Staff accept this, and have recommended a one kilometre area is added to the rule.

Many submitters noted that there is an increasing Bennett's wallaby problem outside of the Containment Area. Staff acknowledge this and note that we are using all of the tools available to try to reduce the populations back to the Containment Area. The Council is working with partners to develop a long term comprehensive programme to reduce wallaby populations.

Submitters also suggested establishing a central authority or control board to better manage Bennett's wallaby. Kurow Pest Management Liaison Committee recommended that the Council undertake a full cost analysis on the set up and operation of a specialized wallaby control unit. Staff consider this to be a pragmatic approach and propose to undertake this analysis as part of the wider Biosecurity Programme.

Russell lupin

Russell lupin were the most commented on additional organism by submitters. Three submitters sought to not include Russell lupin as a pest organism and for this to remain in the Organisms of Interest list. 10 submitters strongly recommended classifying this organism as a pest.

The Council acknowledge and agree that wild Russell lupin poses a serious threat to braided river environments and impacts on the reproductive success of braided river birds and other species. We are seeking to put in place programmes to manage, and where possible prevent, the adverse effects from wild Russell lupin. During the preparation of the PRPMP, the Council was unable to accurately identify the distribution and extent of wild Russell lupin and therefore understand what the cost and resource impact to the Council and landowners would be. Staff would find benefit in receiving evidence (specifically maps) and further discussion through the hearings, in order to make a recommendation on amendments to the PRPMP.