

Environment Canterbury Response to Minute 9

Staff have considered the details of Minute 9 issued by the Hearing Panel on 7 December and provide a response to the matters below.

Matter 2 a: Having taken into account the Council's comments on additional costs for goat control on Banks Peninsula, we do not at this stage propose to make any changes to Objective 23, and direct that the wording in the interim draft Plan is retained.

1. Staff understand the Hearing Panel is seeking that Objective 23 achieves the removal all populations of feral goats from Banks Peninsula¹ within a 10 year timeframe.
2. Staff appreciate the intention to prevent the impact on native biodiversity caused by feral goat populations on Banks Peninsula.
3. There are a number of matters to consider regarding setting this objective in the Plan, these are set out below.

Likelihood of success

4. Staff have noted that the 10% reduction objective proposed in the Interim Draft Plan was set as a conservative target.
5. A key aim of the RPMP review has been to set the regulatory backstop for pest management. The RPMP is a regulatory tool and not the appropriate mechanism to achieve aspirational pest outcomes. It provides the regulation to support more ambitious outcomes that are set out in the wider Environment Canterbury Biosecurity Programme.
6. Staff question the technical feasibility of achieving an eradication outcome (the total removal of feral goat populations) on Banks Peninsula. This is primarily because domestic and farmed goats are permitted within this area. Under the definition of feral goat (as recommended by Staff), a goat becomes feral (within Banks Peninsula) as soon as it is no longer effectively constrained.
7. This would mean that there is an ongoing potential supply and threat of feral goats. While mechanisms such as fencing may be effective in constraining goats, should this mechanism fail (for any number of reasons) or a gate is left open, technically Objective 23 would not be met.
8. While there is some understanding of the feral goat issue on Banks Peninsula, there have not been any recent, detailed surveys undertaken to assess goat numbers and

¹ Area as shown on Map 14 in Appendix 4 (Draft Plan version). Note this is the area described throughout the remainder of the document when Banks Peninsula is discussed.

locations. Without this information, Staff are unable to confidently assess whether an eradication objective is possible.

9. The Biosecurity Act requires monitoring and reporting on the effectiveness of the Plan. Staff anticipate that it may difficult to show an annual or even 10 year positive result based on an eradication target for feral goats within Banks Peninsula.

Cost

10. Staff have noted in the Staff Narrative Report for the Interim Draft Plan, that an objective achieving a ten percent reduction in feral goats would incur a \$20,000 annual cost to implement the provisions in the Plan (including inspection, monitoring, and advice and advocacy). This was anticipated to be delivered on a prioritised or complaint basis.²
11. Staff further advised (in response to Minute 5) that high level estimates for achieving an eradication target may be up to \$500,000 over the 10 years (including implementation of the above activities and also including some Council delivered control).³ This would be an annual increase of \$30,000 per year over the 10 years (if activities are spread evenly over that time). Staff have not undertaken recent detailed surveys of the extent and location of feral goats on Banks Peninsula. Staff have also not assessed the number and situation (method and security of constraint) of domestic and farmed goats that are present in the area. Therefore, the cost estimate provided is based on the best available information at this point in time. The cost may vary (significantly) depending on the situations and number of feral goats found.
12. In response to Minute 5, Staff also highlighted the unknown cost to land occupiers and owners to meet the conditions in the Plan, and note that the reduced timeframe for an eradication objective may mean they need to introduce new constraint measures and undertake mustering in much shorter times than expected under the 10% reduction objective. This is to ensure that any Council delivered control activities are not undermined by continual 'leaking' of goats in areas which have had operations to clear feral goats.
13. Staff have provided an updated Assessment of the Draft Plan against sections 73 and 74 of the Biosecurity Act (1993). Staff do not consider that 74(d) can be satisfied, as the additional funding required to deliver the eradication objective for feral goats has not been scoped or confirmed. This is noted in the updated Assessment.

Options

14. Staff have identified two options for increasing the outcome for feral goat control on Banks Peninsula.

² Refer to paragraphs 30 and 33 of the Staff Narrative Report for the Interim Draft Plan (24 October 2017)

³ Refer to paragraph 38 of the Staff comment on the Revised Interim Draft Plan (20 November 2017)

15. Firstly, the objective could be comfortably increased (with no changes to funding) to 50%, should the efforts and contribution of the Banks Peninsula Goat Working be noted in the objective.
16. Secondly, a more ambitious target for feral goats on Banks Peninsula could sit within the wider Biosecurity Programme. This would be supported and enabled by the regulatory provisions in the RPMP.
17. The benefits of establishing a non-regulatory reduction or eradication programme for feral goats is that there could be further conditions or different definitions applied, which do not impact or limit the enforcement of the rules.
 - the target could be set after a survey of Banks Peninsula is completed, and costs and impacts to land occupiers are better understood
 - the target could be better catered to resource availability (funding and staff resource)
 - the definition of success could be further specified (for example, eradication could be for established populations – and not effected by temporary/short term goat escape. Or, it could be based on ‘known’ feral goat populations).

Matter 2 b: We would like to further consider the Council’s response in the staff report to Ministry of Primary Industries suggestions for drafting changes for Objective 4.

18. Staff have provided a recommendation based on the Ministry for Primary Industries suggestion for Objective 4 as part of the Staff Report on the Draft Plan⁴.

⁴ Refer to paragraphs 18 to 21 of the Staff Report to the Draft Plan (8 December 2017)