

APPENDIX

About Greater Wellington Regional Council

Located in our capital city and including the Wairarapa and Kāpiti Coast, Greater Wellington Regional Council (Greater Wellington) is one of the largest and most diverse regional councils in New Zealand. We have core roles across public transport provision, environmental protection, regional leadership and co-ordination, and bulk water supply.

Greater Wellington has had an evolving formal relationship with six mana whenua partners for over three decades:

- Ngāti Kahungunu represented by Ngāti Kahungunu ki Wairarapa;
- Ngāti Raukawa ki te Tonga represented by Ngā Hapū o Otaki;
- Ngāti Toa Rangatira represented by Te Rūnanga o Toa Rangatira Inc.;
- Rangitāne represented by Rangitāne o Wairarapa Inc.
- Taranaki Whānui represented by the Port Nicholson Block Settlement Trust.
- Te Ātiawa ki Whakarongotai represented by Ātiawa ki Whakarongotai Charitable Trust.

Protection of our region's natural environment delivers a multitude of wider benefits for the economy, our wellbeing, and our communities. Greater Wellington delivers a range of pest animal and plant control services that protect the productive capacity of our agricultural sector, the quality of potable water to our residents, and the opportunities to enjoy the outdoors and harvest kai for our families. However, we are facing significant challenges, several of which are directly undermining our ratepayers' investment in these activities.

Issues of significance (5) for us to partner on

1. Harmonise treatment of feral ungulate control in legislation

Populations of feral ungulates (deer, pigs, and goats) continue to build up in parts of the Wellington region. They destroy native vegetation due to browsing, trampling and subsequent erosion, and are also having significant impacts on pasture, crops, new plantings, and forest across private and council land.

While Greater Wellington controls feral ungulates at designated sites, we are constrained by inconsistent and operationally ineffective sections within the **Wild Animal Control Act 1977 (WACA)** in relation to powers of entry for control purposes. Feral ungulates roam indiscriminately across property boundaries, and due to these inconsistencies Greater Wellington may only control them

where we have landowner permission or Ministerial approval to do so. Feral deer, goats and pigs know their safe havens and readily retreat there when they come under control pressure.

Greater Wellington seeks to retain the power to list deer, pigs, and goats in our Regional Pest Management Plan, create rules related to their control, and deal with infringements. Working with DOC, mana whenua, the Game Animal Council, hunters, and conservation groups may provide the opportunity to develop a strategic approach that meets the needs of hunters and protects the biodiversity and productivity of the region. In addition, Greater Wellington seeks the review and amendment of at least section 16 of WACA allowing Greater Wellington to enter property in an operationally efficient manner to give effect to that pre-agreed strategic approach.

REQUEST

We ask that Government:

- a) includes Greater Wellington / regional council representatives in a collaboration with others to develop a strategic approach to feral ungulate control.
- b) amends the Wild Animal Control Act (especially s16) to allow Greater Wellington to enter property to give effect to a pre-agreed strategic approach to ungulate control.
- c) ensures that regional councils retain the ability to list feral ungulates in Regional Pest Management Plans

2. Progress a Cat Management Act to protect New Zealand's biodiversity and agriculture and safeguard pet cats.

To advance the goals of Predator Free 2050, we need to solve the problem of cats. One of our favourite pets, and very effective killing machines, cats across New Zealand are ripping their way through our native birds, lizards, and insects.

Cats are also one of the most common carriers of the parasite which causes toxoplasmosis, a disease which presents serious health risks to humans, sheep, and native wildlife.

Lack of a consistent approach to cat management is undermining any meaningful progress towards resolving this problem. Rather than one overarching piece of legislation, we have 67 different bylaws from our various territorial authorities, or no management at all.

Greater Wellington supports the development of a Cat Management Act that would include mandatory microchipping, registration of microchipped cats and mandatory desexing of cats. We

agree with Forest & Bird that legislation is the only viable solution for achieving consistent rules that cat owners will trust and councils can enforce.

In the Wellington region, Greater Wellington controls pest cats under the Regional Pest Management Plan, giving us the power to control them on designated sites. Compulsory microchipping and registration would enable us to differentiate between pest and pet cats, optimising our investment in pest control. Compulsory desexing of cats would reduce stray and feral populations, reducing pressure on native wildlife, while supporting public wellbeing and the welfare of cat populations.

REQUEST

We ask that the Government:

- d) introduce a national Cat Management Act with the mandated registration and desexing of pet cats to protect our wildlife, agriculture, and the welfare of cats themselves.

3. Nationwide monitoring and control of Canada geese populations

Canada geese were introduced to New Zealand by the Acclimatisation Society, and until 2011 they were controlled by Fish & Game under the Wildlife Act. At that point, their status changed to “unprotected”, and no single organisation was responsible for managing populations to sustainable levels. At the time DOC committed to monitoring the “arrangements developed by the farming community”, and the need or otherwise for regulations. No such monitoring has occurred. Since then, anyone has been able to control Canada geese, if they do it humanely. With no single point of leadership, no-one has done it effectively. These highly mobile and intelligent birds now roam the landscape and consume large quantities of grass and foul wetlands, paddocks, sports fields, parks, and amenity areas. Despite public concern at these obvious impacts, control measures often generate public backlash.

REQUEST

We ask that the Government:

- e) reviews the regulatory regime for the control of Canada Geese, setting clear outcomes and responsibility to the appropriate government department.
- f) increases the priority and resourcing for the Canada Geese inter-agency working group, with a clear direction towards a coordinated and robust programme of nationwide control.

4. Use climate policy to drive environmental restoration.

The current Emissions Trading Scheme settings do little to encourage landowners to plant indigenous forest or create or restore wetlands because the returns are much greater from planting pines to earn emissions units. On this basis, New Zealand will end up with a lot of permanent pine forests but no improvements to biodiversity or lower gross emissions. Intervention is needed to ensure we get better outcomes.

The government has been considering a 'biodiversity credits' scheme, where buyers can voluntarily purchase environmental improvements using standard units, like carbon credits.

We strongly suggest the government exercise caution in developing a generic biodiversity credit, given the scientific challenges of defining highly diverse environmental and ecological properties.

We can also learn from the track record of the voluntary carbon market, where most voluntary credits have been exposed as being 'junk'¹. Beyond bad accounting, carbon forests can and have burnt down, undoing the benefits that the polluters who bought the associated credits have claimed². These sorts of issues can also be expected within a biodiversity credits scheme. There are likely to be more straightforward ways that government could use to support and enable private investment in environmental restoration. Direct government investment is also critical.

REQUEST

We ask that the Government:

- g) amends the Emissions Trading Scheme to provide greater incentive to landowners to plant indigenous forest, to improve biodiversity outcomes over permanent pine forests.
- h) exercises caution in introducing a biodiversity credit scheme and consider more straightforward options to achieve desired outcomes.

5. Keep the existing national direction under the national planning framework; extend implementation timeframes.

Water is one of the most precious taonga in New Zealand, and Greater Wellington supports the National Policy Statement for Freshwater Management (NPS-FM) in its drive to protect our freshwater. Our waterways provide drinking water and support for industries such as farming and tourism, and are also valued for mahinga kai, education, tourism, and ecological health.

¹ [Revealed: top carbon offset projects may not cut planet-heating emissions | Carbon offsetting | The Guardian](#)

² [US Forest Fires Threaten Carbon Offsets as Company-Linked Trees Burn - Inside Climate News](#)

In our region, GW has created Whaitua Committees to develop Whaitua Implementation Programmes (WIP), to describe community aspirations for freshwater and set a platform for collective effort to improve the health of waterways (Whaitua is the Māori word for space or catchment). The WIP is implemented through new regulations and actions on the ground.

GW has just notified Plan Change 1 for our Natural Resources Plan, implementing the requirements of the NPS-FM and the WIPs for Te Whanganui-a-Tara (Wellington/Hutt Valley) and Te Awarua-o-Porirua (Porirua Harbour). We expect to finalise the Plan Change by mid-2025.

While we are making good progress, the Plan Change process is very time- and resource-intensive, and requires extensive collaboration with partners, stakeholders, and the community. The Government's current deadline (end 2024) is not achievable for Greater Wellington. We support an extension to achieve implementation by the end of 2026, in line with your election commitments. This timeframe would be far more reasonable and realistic and would go a long way to support enduring relationships with our mana whenua partners, the community, key business sectors and local councils.

We note your intention to “consider ways to rebalance Te Mana o te Wai to better reflect the interests of all water users”. We take this to mean that the existing provisions will be kept in part and clarified and strengthened in other areas.

GW can help redesign this process, and we offer our assistance to develop a range of options for decision-makers.

REQUEST

We ask that Government:

- i) retains the National Policy Statement for Freshwater Management, extends the implementation deadline to the end of 2026, and accepts Greater Wellington assistance to clarify and strengthen the provisions.