Appendix C: Potential long list of solutions

Table 1: Long list of potential solutions to address the key challenges raised. Red boxes = high priority for implementation, orange = medium priority, and green = lowest priority. Priorities have been assigned based on which solutions we perceive to have the potential for greatest impact on improving the overall system.

Potential solutions	Challenges addressed	Implementation	Synergies/alignment with other review recommendations and strategies
Re-invigorate the Tuia Te Taiao website to provide a single, comprehensive regulatory guidance resource for PF activities: Create a central, user-friendly online portal specific to PF2050 activities. This portal could sit within the existing Tuia Te Taiao website (https://www.tuiatetaiao.nz/) and be accessed by PF Groups via a login enabling the website to also serve the existing wider function of acting as a 'one stop shop for information about the Predator Free 2050 Movement'.* The portal needs to: - Build on Appendix A to consolidate all relevant guidance, approval requirements, processes, timelines, and decision-maker expectations across all regulatory agencies which interface with PF2050 activities. Agencies should offer explicit checklists of required information for applications. - Include an online directory of resources to assist in navigating the various regulatory processes (e.g. links to SOPs, examples of well-prepared applications including operational maps, risk assessments etc) to guide applicants. - Provide links to where PF Groups can seek assistance with mana whenua engagement e.g. https://www.tkm.govt.nz/ , EPA Māori Engagement Team, and contacts for regional and district councils. - Message board enabling PF Groups to share what is working well, or to troubleshoot issues. **Note that there are a multitude of websites containing information on PF2050. As an external user, this made finding information very difficult. As part of the above-mentioned solution, the online presence could be consolidated by providing links to these websites on the Tuia Te Taiao website.*	• Navigating the regulatory system • Mana whenua engagement guidance • Data requirements and expectations	**Key Stakeholders:** DOC, EPA, MPI, MoH, PF Groups **Priority:** High priority **Considerations:** Will require support of website design expertise as well as an ongoing resource to coordinate and oversee updating of the portal to ensure it remains current. It is noted that DOC are currently in the process of developing an online portal for DOC applications: *"New online application portal coming soon* *We're improving our services and moving applications to a new online portal. You'll be able to apply, interact with us, and get updates on your applications in real time.* *The first applications will be permits for drone use for recreation, research and commercial purposes.* *The portal for drone applications is coming soon. Other applications will be moving to the portal over the next 12 months."* https://www.doc.govt.nz/get-involved/apply-for-permits/all-permissions/drone-use-on-conservation-land/recreational-drone-use/	**ANZBS 2020:** Objective 2 *Treaty partners, whānau, hapū, iwi and Māori organisations are rangatira and kaitiaki* **PF2050 Strategy Policy and Legislation Action Plan:** Milestones 4 & 5 *The specific regulatory needs of individual projects and PF2050 regional plans are identified and implemented.* *Codes of Practice - Consistent codes of practice and toolbox of resources, as well as support for helping people navigate the system is needed.* **Agricultural and Horticultural Products Regulatory Review:** Recommendation 13 *Recommend the EPA and NZFS improve their performance reporting and MfE and MPI review statutory timeframes in their respective legislation.* Recommendation 14 *Prioritise the provision of up-to-date guidance, pre-application support, and transparency on application processing.* **EPA Review of Permissions Frameworks under HSNO:** Recommendation 3 (All applicants should be required to provide comprehensive information and to certify the accuracy and currency of the information)

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Facilitate relationship building with assessors: Establish formal and informal channels (e.g., dedicated PF2050 liaison officers within agencies, regular stakeholder forums, pre-application consultation opportunities) to foster early and consistent relationships between PF Groups and regulatory agency assessors, to increase understanding of the PF2050 context, guide applicants through the regulatory process, and also to inform forward planning regarding any need for additional resourcing within regulatory agencies.	• Optimising the DOC approvals system • Capacity to process approvals • Consistent and workable approval conditions • Operations supported across land tenures • Data requirements and expectations • Staff turnover and retention of institutional knowledge	**Key stakeholders:** DOC, EPA, MPI, MoH **Priority:** High priority **Considerations:** Capacity and resourcing within agencies to facilitate on an ongoing basis will be required.	**ANZBS 2020:** Objective 9 *Collaboration, co-design and partnership are delivering better outcomes.* **PF2050 Strategy Policy and Legislation Action Plan:** Milestone 7 *PF2050 is building the support of decision makers* **Agricultural and Horticultural Products Regulatory Review:** Recommendation 1 *Recommend the formation of a Sector Leaders Forum* Recommendation 15 *NZFS and the EPA extend existing stakeholder engagement forums to operate across both regulatory systems*
Assess level of resourcing within DOC and the EPA and/or existing roles/team structures to free up capacity and promote consistency: Both agencies highlighted that resourcing was an issue. An assessment of pipeline PF2050 work should be undertaken to inform the most appropriate course of action to ensure sufficient processing capacity within regulatory agencies. This should include investigation into the types of applications processed, and the most efficient and effective options to process these noting the need for consistency at a national scale. Options could include (but are not limited to): - Advocating for further funding for resourcing - Developing a PF2050 workstream (including consideration of dedicated assessors for kiwi translocations) - Re-defining roles to ensure appropriate balance between fieldwork and application processing	• Capacity to process approvals	**Key stakeholders:** DOC, EPA, PF Groups **Priority:** High **Considerations:** Will likely require business case support, and implications for existing teams will need to be worked through.	
Explore opportunities to expand on the recommendation of the Agricultural and Horticultural Products Regulatory Review regarding relying on assessments by international regulators: The above-mentioned review found that there is scope for the EPA and the NZFS to increase their use of information provided by international regulators. The	• Capacity to process approvals	**Key stakeholders:** DOC, EPA, MPI, Ministry for Regulation, PF Groups **Priority:** High **Considerations:** Appetite of Ministry for Regulation to take into account sectors and issues wider than those raised in their review.	**Agricultural and Horticultural Products Regulatory Review:** Recommendation 7 *Recommend that the EPA and NZFS maximise their use of assessments by international regulators for assessing the risks of a product while still considering aspects unique to New Zealand.*

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review noted that there is a need for flexibility to ensure that decisions inappropriate for New Zealand are not directly adopted. However, it recommended that regulators should start from a position that recognised international regulators' decisions are sound and focus on any New Zealand-specific considerations or risks. Clear definitions on what requires New Zealand-specific assessment are needed for transparency and consistency. This recommendation by the Ministry for Regulation relates to findings in the review associated with New Zealand's competitive disadvantage, enabling timely access to products, the speed and certainty of approval pathways, efficient and proportionate regulations, and regulator capacity and resourcing. The issues raised in the above-mentioned review are also mirrored in this report. Given this recommendation has already been highlighted to Central Government, there is opportunity to explore wider synergies to ensure any legislative changes also assist the PF2050 context.			Recommendation 8 *Recommend that the EPA and MPI (including NZFS) prioritise engagement at the international level to support harmonisation of requirements*
Undertake a regulatory scan to identify barriers to achieving the PF2050 goal as well as opportunities to support PF2050 activities in statutory documents: This scan should include consideration of whether: - PF2050 goals are reflected in objectives and policies of relevant statutory plans - Rules, standards and programmes enable or hinder PF2050 activities (e.g. regional/district plans, RPMPs, SOPs, performance standards, DOC pre-approved toxin list) - It is feasible to draft standard PF2050 site-led programmes for insertion into Regional Pest Management Plans to enable powers under the Biosecurity Act 1993 to be relied on and address land tenure challenges. - Legislation allows for a streamlined process to assess variations to approvals and respond to incursions - Assessment criteria for approvals are proportional to risk of PF activities; and	● Optimising legislation and regulatory plans ● Consistent and workable approval conditions ● Capacity to process approvals ● Operations supported across land tenures	**Key stakeholders:** DOC, EPA, MPI, MoH, Regional/District Councils, PF Groups **Priority:** High **Considerations:** Will require additional resources and programme management.	**PF2050 Strategy Policy and Legislation Action Plan:** Milestone 1 *Ensure there is an optimal and interconnected wider biodiversity system in place that supports and strengthens PF2050.* Milestone 3 *The role of PF2050 in achieving wider biodiversity outcomes is recognised and provided for in national and regional biodiversity strategies* Milestones 4 & 5 *The specific regulatory needs of individual projects and PF2050 regional plans are identified and implemented.* Milestone 6 *National policy instruments that assist the work of PF2050 are identified and utilised (e.g. national pest management plans and unwanted organism classifications).* Milestone 8 *Hazardous Substances and New Organisms Act 1996 (HSNO) and Agricultural compounds and veterinary*

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- Internal strategies and objectives of regulatory agencies, particularly DOC are explicitly aligned with and support the outcomes of PF2050. - There is duplication in requirements, process and function across legislation and regulatory agencies. - Blanket EPA containment approvals for VTA trials can be issued. Once this scan has been completed, it is recommended that a resource is appointed to coordinate a process and programme for advocating for/implementing the required changes. This resource should also have oversight of upcoming opportunities for engagement on legislation change and regulatory plans and ensure that feedback from end-users is taken into account to assist in making conditions/rules/requirements SMART* in addition to providing necessary mitigation, risk management, and environmental protection. **Specific, measurable, achievable, realistic, time-bound*			*medicines (ACVM) requirements support decisions on novel predator control technologies and methods.* **Agricultural and Horticultural Products Regulatory Review:** Recommendation 4 *Recommend that MPI, MfE, NZFS and the EPA make the two regulatory systems easier to navigate.* Recommendation 5 *Recommend that agencies increase the use and better design of group standards, rapid assessment pathways, registration exemptions, and selfassessable changes.* Recommendation 16 *Recommend that MfE review the emergency approval provisions under the HSNO Act, including better enabling products to be approved for biosecurity responses.*
Expand the existing DOC project on reviewing the permissions system to also include permissions issued by local DOC offices: The current project led by the Policy and Regulatory Services Group out of Head Office is looking at how the permissions system operates to make sure DOC systems are clear and understandable, and to assist in addressing backlogs. Whilst the current focus is on national aerial permissions, to ensure that the DOC permissions system is optimised and duplication of work and process is avoided, the entire permissions system should be included in this review. Consideration of how information held within DOC systems can be used to inform applications without applicants having to request this information from DOC should also be included in the review.	• Optimising the DOC approvals system • Capacity to process approvals	**Key stakeholders:** DOC, PF Groups **Priority:** High priority **Considerations:** Timelines for the existing project and whether there is potential to expand the scope.	**EPA Review of Permissions Frameworks under HSNO:** Recommendation 2 *Technology should be used effectively by all decision makers to allow a centralised process to operate efficiently.* Recommendation 3 *All applicants should be required to provide comprehensive information and to certify the accuracy and currency of the information.*
Support recommendations to centralise process for assessing permission applications currently delegated to public health officers as outlined in the EPA review of VTA permissions under HSNO Act: Provide support to the EPA for actioning recommendations to further streamline the regulatory landscape where it has been identified that current	• Increased efficiency in MoH VTA approvals	**Key stakeholders:** DOC, MoH, EPA **Priority:** High priority **Considerations:** N/A	**EPA Review of Permissions Frameworks under HSNO:** Recommendation 1 *The process for assessing permission applications that are currently delegated to public health officers should be centralised.* Recommendation 2

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processes are adding little value (e.g. MoH permissions).			*Technology should be used effectively by all decision makers to allow a centralised process to operate efficiently.* Recommendation 5 *The EPA should consider whether any of the conditions routinely placed on a permission for the use of VTAs can be set as controls under Part 6 of the HSNO Act. Alternatively, conditions imposed should be standardised as much as possible.* Recommendation 8 *The EPA should make decisions on permission applications currently delegated to public health officers and should be provided adequate resourcing to do so.*
Explore a triage process for approval applications within DOC, MPI and EPA to fast-track assessment of low risk approval applications: Regulatory agencies should review their methodologies for processing applications to determine whether more streamlined processing pathways can be created for applications which present a low level of risk.	• Capacity to process approvals	**Key stakeholders:** DOC, MPI, EPA, PF Groups **Priority:** High priority **Considerations:** May require legislative changes.	**EPA Review of Permissions Frameworks under HSNO:** Recommendation 6 *A triage process should be developed to assess the risk posed by individual applications.* **Agricultural and Horticultural Products Regulatory Review:** Recommendation 3 *Recommend that the Minister for the Environment and Minister for Food Safety set expectations for targets to accelerate HSNO and ACVM processes and reduce queues.* Recommendation 9 *Recommend that MPI (including NZFS), MfE and the EPA explore a strategic priority pathway, in addition to the current first come, first served queue.* Recommendation 10 *Recommend that the EPA update their outdated risk assessment models and consider how to keep them up to date for the future*
Accept offer from WorkSafe to facilitate a session with PF Groups and CHC certifiers authorised for VTAs: The purpose of this meeting would be to canvas challenges raised in this report in relation to the CHC and CSL approval processes, with a view to assessing what can be addressed.	• Certainty in CHC and CSL processes	**Key stakeholders:** DOC, WorkSafe, PF Groups **Priority:** High priority **Considerations:** N/A	N/A
Ensure right skill mix within PF Groups:	• Navigating the regulatory system	**Key stakeholders:** PF Groups	N/A

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When PF Groups are established ensure that someone with regulatory expertise is appointed to assist in navigating the relevant approvals.		**Priority:** Medium **Considerations:** N/A	
Establish nationally agreed criteria for kiwi translocations and a process for acknowledging and leveraging external expertise: - Develop clear, agreed-upon national guidelines and criteria for kiwi translocations, including pest suppression levels and requirements for supporting plans. This will reduce inconsistency and provide certainty for PF Groups. - Formalise a process for recognising expertise in kiwi translocation where those experts sit outside of DOC. A suitably qualified and experienced expert could be a person who is willing to certify (by signature) that the content of any assessment or advice they have produced complies with good practice and professional standards, and to stand by the conclusions of that report/advice. For example, a person certifying a report should be someone who could ultimately stand in the Environment Court and provide expert testimony, and whose experience and qualifications stand up to Court scrutiny.	● Data requirements and expectations ● Capacity to process approvals	**Key stakeholders:** DOC, Kiwi Recovery Group and PF Groups **Priority:** Medium **Considerations:** N/A	**PF2050 Strategy Policy and Legislation Action Plan:** Milestones 4 & 5 *The specific regulatory needs of individual projects and PF2050 regional plans are identified and implemented. Codes of Practice - Consistent codes of practice and toolbox of resources, as well as support for helping people navigate the system is needed.* **ANZBS 2020:** Objective 2 *Treaty partners, whānau, hapū, iwi and Māori organisations are rangatira and kaitiaki*
Where circular dependencies between regulatory approval processes exist, establish a process for resolution: This should include consideration of: - Feasibility of bundled approval processes for functionally dependent activities; - Appointment of a lead agency to coordinate information sharing and resolve dependencies where approval processes span multiple agencies.	● Optimising legislation and regulatory plans ● Optimising the DOC approvals system	**Key stakeholders:** DOC, EPA, MPI, MoH, PF Groups **Priority:** Medium priority **Considerations:** N/A	N/A
Consider putting people through the process of becoming test certifiers for VTAs and or aligning with a specific certifier: WorkSafe have suggested that those regularly using VTAs (e.g. PF2050 Groups, regional councils, OSPRI, DOC) put a couple of people through the process of	● Certainty in CHC and CSL processes	**Key stakeholders:** DOC, WorkSafe, PF Groups **Priority:** Medium priority **Considerations:** N/A	N/A

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becoming test certifiers for VTAS to ensure sufficient capacity within the system, or for PF Groups to align with a specific certifier who routinely processes CHC applications within acceptable timeframes. It is noted that PF Banks Peninsula are currently pursuing this route.			
Improve accessibility and clarity of online resources: Review regulatory agency websites to ensure: - They are navigable to an external user; and - All application forms are readily available online, use clear, outward-facing language with minimal acronyms and internal jargon, and expressly state application requirements.	• Navigating the regulatory system	**Key stakeholders:** DOC, EPA, MPI, MoH **Priority:** Low priority **Considerations:** Will require support of a website designer.	N/A
Cross-agency agreement on content requirements for standard sections of application forms: Explore with the EPA, DOC, MPI and MoH the potential to develop agreed content requirements for standard sections of application forms to increase consistency and efficiency - both for applicants and assessors.* **All application forms have sections which are standard across approvals e.g. details of activity (what, when, where, why, how), applicant details, geographic area (maps), duration, other approvals applied for, consultation etc.*	• Navigating the regulatory system • Data requirements and expectations • Capacity to process approvals	**Key stakeholders:** DOC, EPA, MPI, MoH **Priority:** Low priority **Considerations:** Will require support of a website designer.	**EPA Review of Permissions Frameworks under HSNO:** Recommendation 2 *Technology should be used effectively by all decision makers to allow a centralised process to operate efficiently.*
Clarify role of DOC and PF Groups in the PF2050 system: Where there is overlap between the mandate of DOC and PF2050 activities (e.g. predator control and wider biodiversity monitoring), the role, expectations and responsibilities of each group should be clearly defined and agreed.	• Navigating the regulatory system	**Key stakeholders:** DOC, PF Groups **Priority:** Low priority **Considerations:** N/A	**PF2050 Strategy Policy and Legislation Action Plan:** Milestone 7 *PF2050 is building the support of decision makers.*