



Remember
submissions
close at 5pm,
Friday 21
October 2022

Proposed District Plan submission form

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

TO: Far North District Council

This is a submission on the Proposed District Plan for the Far North District.

1. Submitter details:

Full Name:	Leonie Exel		
Company / Organisation Name: (if applicable)	The BOI Watchdogs		
Contact person (if different):			
Full Postal Address:	PO Box 30, Russell, 0242		
Phone contact:	Mobile: 0223 177 291	Home:	Work:
Email (please print):	leoexel@hotmail.com		

2. (Please select one of the two options below)

- I **could not** gain an advantage in trade competition through this submission
 I ~~could~~ gain an advantage in trade competition through this submission

If you could gain an advantage in trade competition through this submission, please complete point 3 below

3. **Not Applicable**

- I ~~am~~ directly affected by an effect of the subject matter of the submission that:
 _____ (A) Adversely affects the environment; and
 _____ (B) Does not relate to trade competition or the effect of trade competition
- I ~~am not~~ directly affected by an effect of the subject matter of the submission that:
 _____ (A) Adversely affects the environment; and
 _____ (B) Does not relate to trade competition or the effect of trade competition

Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991



The specific provisions of the Plan that my submission relates to are:

We have found it difficult to work out which sections relate to dogs and dog owners, and fear that we will miss some clause or policy that has a negative impact on our furry family members.

The specific provisions of the Plan that our submission relates to are, as far as we can tell, listed below: Any objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to **wellbeing, dog owners, dogs, the banning of dogs (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, sub-divisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs).**

This includes but is not limited to:

- Not currently in the documentation, but critical for review: the 'Practice Note For Significant Indigenous Flora and Fauna' and the 'Bay of Islands Kiwi Distribution Map Support Document'. Part 2, District Wide Matters, Strategic Direction, Economic, and social wellbeing: all social prosperity objectives, and Natural Environment: SDEP06.
- Any section which mentions pets, and/or pests (where dogs have been named pests).
- Any sections which state the aim is to "Encourage and support active management of pest plants and animals" or "Require landowners to manage pets and pest species to avoid risks to threatened indigenous species."
- Subdivision section, SUB-R3, CON-2.
- IB-02: Indigenous biodiversity is managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.
- IB-P7: Encourage and support active management of pest plants and pest animals.
- IB-P9: Require landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.
- IB-P10 and all subsections: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: (including all clauses).
- Part 3, Appendices - APP3 – Subdivision management plan criteria, including (i) measures to protect, manage and enhance indigenous vegetation and habitats, ONL and ONF, heritage resources and riparian margins, including appropriate means of controlling dogs, cats, rats, mustelids and other animal pests and the means of controlling pest plants.

Official records of recent FNDC decisions on consenting issues, confirmed the District Plan provisions are being over-riden by practise notes. The content of the known notes is not reflected in the proposed DP, and the notes have not been disclosed. That prevents an accurate assessment of the impact of the District Plan on individuals or the district, and raises questions about the statutory compliance and integrity of the consultation process and outcomes. In addition, there is no identification of SNA's or the "Kiwi" areas referred to in the clauses mentioned above, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. I ask Council to make those critical documents, and all other undisclosed relevant information, publicly available now. Two such critical documents are:

- The 'Practice Note for Significant Indigenous Flora and Fauna', and
- The 'Bay of Islands Kiwi Distribution Map – Support Document'.

Confirm your position: Support Support In part Oppose
(please tick relevant box)



My submission is:

I am the co-ordinator of the Bay of Islands Watchdogs and I support our submissions and recommendations.

I am hopeful that our newly elected Council will mark a watershed in terms of how FNDC chooses to act towards residents who own dogs; we comprise up to half of this district.

Our dogs are our family members, best friends, counsellors, workmates, pig hunters, and brilliant farmhands. I do not accept that FNDC has a right to ban and restrict me and my family from owning pets responsibly, anywhere in Northland.

FNDC management's choices to ban and restrict dog owners for two decades indicates that they have not considered the unintended consequences of their actions.

Those consequences include:

- negative economic impacts on our rohe in terms of housing and worker availability,
- humanitarian and mental health crises with people having to relinquish pets,
- animal rescue services and pounds being overwhelmed with dogs, and financially stressed
- animal rescue services being unable to find land which is suitably zoned for them to base their operations,
- fewer children living in homes which have dogs, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs,
- increase in the number of dogs being dumped in the bush due to lack of available rentals, which has a potentially serious impact on native wildlife,
- negative impact on real estate agents and developers, by reducing their potential buyer/tenant markets, even when they offer FNDC multiple means by which potential owners could control dogs effectively in high density kiwi areas (e.g. fencing, registration, micro-chipping, and de-sexing requirements),
- reduction in tourism from family members who own dogs deciding not to travel North, as their parents live in areas where their dogs are not allowed,
- reduction in tourism from dog-owners who are sight-seeing, as Northland's reputation for anti-dog attitudes grows,
- less positive view of our district as a retirement area,
- legal implications for FNDC should the community decide to challenge these restrictions/bans,
- further decrease in (already fragile) trust between FNDC management and around half the community, who own dogs,
- decrease in trust between dog owners and DOC, which in turn makes us wary of their advice about dogs and wildlife,
- lessened participation in local democracies, as residents give up trying to engage with a council they believe is just not listening,
- creation of a false and destructive division between environmentalists and bird lovers, versus dog lovers, in our local communities which did not previously exist (we are all animal lovers), and
- increasing anger from dog lovers about kiwi release programmes, which are seen as impinging on our right to live in more and more townships.

There are additional issues which have had a critical impact on trust between council management and the dog-loving community. These are detailed in the BOI Watchdog submission and need to be addressed urgently as they underlie the mistrust that has built over many years between FNDC and dog owners,



which in turn damages FNDC's capacity to encourage voluntary commitment to the environmental and ecological goals FNDC is seeking to achieve. Those issues include:

- anger and fear among women about the lack of attention paid to sexual harassment complaints in the animal management department,
- potentially poorer quality applicants for jobs in animal management and district services, particularly from women, as the alleged toxicity and misogyny in that department becomes even more widely known,
- anger at the amount of time spent in consultation processes, that do not lead to substantive change,
- frustration at the adversarial, rather than collaborative, nature of FNDC management,
- anger at disrespect towards cultural considerations,
- a belief, founded or otherwise, that FNDC management might 'hide' or obfuscate policies and documents which could have a serious impact on our dogs and lives,
- a belief that – colloquially speaking - FNDC management wants Northland to become a kiwi haven, where there are no dogs or cats permitted – a huge, flightless bird aviary,
- an increasing sense of unfairness that FNDC appears to have worse planning rules for residents, and easier rules for FNDC's own projects and properties, and
- increasing disrespect for and lack of trust in the FNDC legal department's advice in relation to bylaws, dogs, and dog restrictions.

I seek the following decisions from Council:

Please see Bay of Islands Watchdog submission for recommended decisions, which I support.

YES I wish to be heard in support of my submission on behalf of the BOI Watchdogs

~~I do not wish~~ to be heard in support of my submission

(Please tick relevant box)

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Yes- **No**

Do you wish to present your submission via Microsoft Teams?

Yes **No**

Signature of submitter: (or person authorised to sign on behalf of submitter)

Leonie Exel

Date: 21.10.22

(A signature is not required if you are making your submission by electronic means)

Important information:

1. The Council must receive this submission before the closing date and time for submissions (5pm 21 October 2022)
2. Please note that submissions, including your name and contact details are treated as public documents and will be made available on council's website. Your submission will only be used for the purpose of the District Plan Review.
3. Submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).



Send your submission to:

Post to: Proposed District Plan
Strategic Planning and Policy, Far North District Council
Far North District Council,
Private Bag 752
KAIKOHE 0400

Email to: pdp@fndc.govt.nz

Or you can also deliver this submission form to any Far North District Council service centre or library, from 8am – 5pm Monday to Friday.

Submissions close 5pm, 21 October 2022

Please refer to pdp.fndc.govt.nz for further information and updates.

Please note that original documents will not be returned. Please retain copies for your file.

Note to person making submission

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

SUBMISSION NO

SUBMISSION NUMBER

Submission to FNDC Proposed District Plan Consultation

21 October, 2022

~ The BOI Watchdogs ~



"The greatness of a nation and its moral progress can be judged by the way its animals are treated."

Mahatma Gandhi

We would like to speak to this submission, which has been prepared by co-ordinator Leonie Exel with the assistance and on behalf of a number of our members. I do not have any known conflicts of interest, or financial interests, relating to this submission.

1. Summary of Recommendations

Thank you for the opportunity to comment on the Proposed District Plan (PDP).

The BOI Watchdogs seek the following decisions from the elected Council in relation to that proposal.

That the newly elected Council of the Far North District Council:

- S354.001 • **Prepares a motherhood/policy statement/vision which makes it clear to FNDC management that responsible pet ownership is positive for our community, and enhances community well-being. This should also make it clear that complete transparency around dog bans or restrictions is required.**
- S354.002 • **Direct FNDC management require a review all documentation in the PDP to ensure that it meets the above motherhood statement, so that elements which may impact dogs and dog owners can be clearly identified to Council.**
- S354.003 • **Require of FNDC management that regular hui be held with dog owners, and that the purpose of those meetings is for senior staff to listen to the community, and to begin to re-build trust, and working relationships.** At least one elected member should consistently attend these meetings.
- S354.004 • **Direct FNDC management to work with local animal rescue services immediately, to help them in this crisis period, not hinder them.** This should include consideration of emergency funding to cope with the increase in the number of dogs needing rehoming, access to free EAP services, funding for de-sexing dogs across the rohe, and infrastructure so they can help residents who have to relinquish dogs (in part, due to FNDC's own actions over the last two decades).
- S354.005 • **Review and consider mandatory de-sexing and breeder regulations.**
- S354.006 • **Halt the banning and restricting of dogs on our sub-divisions, immediately, until the elected Council and community have obtained the following information, and had an opportunity to make decisions on it, with genuine community consultation:**
 - **Information about the extent of the dog bans and restrictions across Northland**, including any restrictions or bans which may apply on Māori land; clarity about the nature of those restrictions, and; clarity around the number of years that such restrictions have taken place.
 - **External, independent, legal opinion on whether the use of the RMA and sub-division policies and practices to ban pets**, to the extent that has been occurring, **is legally appropriate.**
 - **External, independent legal review of FNDC legal department's action against Donna Doolittle's Animal Rescue** in terms of (i) **alleged bias** shown against her within the animal management department, and (ii) **the differential application of the word 'kennel', with all its attendant obligations, between FNDC's resource application for its Horeke pound, versus Donna Doolittle's Animal Rescue.**
 - **Review of the dog bans and restrictions at the Ngawha Industrial Enterprise Park (NIEP) and Quail Ridge Retirement Village, to assess impact on the community and surrounding properties.**
 - **External, independent, academic review of the two documents FNDC currently uses 'internally' to ban dogs**, by a non-DOC funded/controlled organisation, which has experience of dog behaviour (e.g. Massey University). Those documents are the **'Practice Note For Significant Indigenous Flora and Fauna'** and the **'Bay of Islands Kiwi Distribution Map Support Document'**. We wish to have input to that review.
 - **A summary of positive alternatives to the banning and restricting of dogs on sub-divisions which would provide safety for wildlife**, while also allowing responsible dog owners to live

with their canine family members. This should include review of whether breeder oversight and regulations need strengthening, and whether there is support for mandatory de-sexing of pet dogs, when they are not owned by breeders or farmers.

- **An analysis of the potential unintended consequences of FNDC's dog bans and restrictions**, including (i) the impact on the **availability of rental and sale properties for dog owners**, including information from developers and real estate agents, (ii) the **impact on the well-being of families who are forced to relinquish their pets to obtain housing**, and (iii) **whether community acceptance of the release of kiwi would be adversely affected if the community was aware of the implications this has on their rights to pet ownership**.

S354.007

- **Apologise for FNDC management's history of obfuscation and secrecy around the banning and restricting of dogs in our community.**

S354.008

- Instruct FNDC management to support dog owners who are tenants by **encouraging the Northland Regional Council to remove advice on their website, or on any other documents, that landlords should not allow pets on tenancy agreements.**

S354.009

- **Instruct FNDC management to encourage, facilitate and resource dog owners and environmentalists to work together in our own local communities to find local solutions to any issues.**

S354.010

- **Ensure that consultation around dog management always occurs with iwi and hapu, particularly those in the Hokianga, whose family members and ancestors were directly harmed by the Dog Tax Wars of 1898.**

S354.011

- **Directs FNDC management to abide by its own rules and regulations.** What is good for the goose, should be good for the gander.

S354.012

- **Review the culture and functioning of the Animal Management Department, from the bottom up, with protection for whistle-blowers inside and outside the council.** Review every complaint over the last five years. Consult the community. Please help protect the current and future frontline staff. It is such a tough job, and they deserve support and safety.

S354.013

- **Direct FNDC Management that the use of the Public Works Act by FNDC be more judicious, and subject to regular, quick, oversight by the elected Council, so that it is not used to bully residents, or obtain unfair financial advantage over people in our community, as appeared to be the case in the purchase of Melka Kennels in Kaikohe.**

S354.014

- **Review FNDC consultation processes, to work out how to better ensure that all our community members genuinely understand documentation, and can contribute fully.** In addition, **provide funding for residents and community groups to get professional support when consultations are very complex.** This should go some way to reduce the imbalance between volunteer community member input, and that of large organisations who have paid lobbyists writing their responses (e.g. DOC, Farmers Federation, Forest and Bird).

2. Relevant sections/specific provisions of the Proposed District Plan

The specific provisions of the Plan that our submission relates to are:

We have found it difficult to work out which sections relate to dogs and dog owners, and fear that we will miss some clause or policy that has a negative impact on our furry family members.

The specific provisions of the Plan that our submission relates to are, as far as we can tell, listed below: Any objectives, sections, policies, rules, regulations, practice notes, and supporting documentation which relates to **wellbeing, dog owners, dogs, the banning of dogs (via resource consent conditions, covenants or consent notices), the impact of dogs on the environment, kennels, sub-divisions, dogs and their relationship with native flora and fauna, significant natural areas, zoning which limits dog ownership, and dog limits placed on Significant Natural Areas (SNAs).**

This includes but is not limited to:

- S354.015 • Part 2, District Wide Matters, Strategic Direction, Economic, and social wellbeing: all social prosperity objectives, and Natural Environment: SDEP06.
- S354.016 • Any section which mentions pets, and/or pests (where dogs have been named pests).
- S354.017 • Any sections which state the aim is to “Encourage and support active management of pest plants and animals” or “Require landowners to manage pets and pest species to avoid risks to threatened indigenous species.”
- S354.019 • Subdivision section, SUB-R3, CON-2. S354.018
- S354.019 • IB-02: Indigenous biodiversity is managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.
- S354.021 • IB-P7: Encourage and support active management of pest plants and pest animals. S354.020
- S354.021 • IB-P9: Require landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.
- S354.022 • IB-P10 and all subsections: Manage land use and subdivision to address the effects of the activity requiring resource consent for indigenous vegetation clearance and associated land disturbance, including (but not limited to) consideration of the following matters where relevant to the application: (including all clauses).
- S354.023 • Part 3, Appendices - APP3 – Subdivision management plan criteria, including (i) measures to protect, manage and enhance indigenous vegetation and habitats, ONL and ONF, heritage resources and riparian margins, including appropriate means of controlling dogs, cats, rats, mustelids and other animal pests and the means of controlling pest plants.

Official records of recent FNDC decisions on consenting issues, confirmed the District Plan provisions are being over-ridden by practise notes. The content of the known notes is not reflected in the proposed DP, and the notes have not been disclosed. That prevents an accurate assessment of the impact of the District Plan on individuals or the district, and raises questions about the statutory compliance and integrity of the consultation process and outcomes. In addition, there is no identification of SNA's or the "Kiwi" areas referred to in the clauses mentioned above, that also makes it impossible to properly understand and assess the impact of the DP on individuals and or the district. I ask Council to make those critical documents, and all other undisclosed relevant information, publicly available now. Two such critical documents are:

- The ‘Practice Note for Significant Indigenous Flora and Fauna’, and
- The ‘Bay of Islands Kiwi Distribution Map – Support Document’.

3. Background: Dogs, Northland, Issues, and Watchdogs

3.1 Dogs are our best mates, and they are crucial to our wellbeing

For most of us dog owners, our dogs are family members. They are our best mates, and our lives are not complete without them. When they pass away, we grieve as we would grieve the loss of a dear friend. We humans have been domesticating dogs for over 33,000 years¹. Dogs are not just companions – they support people with disabilities, sniff out COVID and cancer, find survivors in rubble and war time, and help our police.

Research indicates that there are numerous positive benefits to dog ownership for members of our community². In addition to the long-recognised companionship, caring, sharing and security aspects of having a dog, pet ownership has multiple positive physical and mental health benefits for owners.

"It has been suggested that dog ownership can improve human mental well-being through several possible pathways. Dogs may provide their owners with social support and companionship and they may also act as catalysts for increased human social interactions. Acute human–dog interactions have been shown to elicit positive hormonal effects including reduced cortisol concentrations, a biomarker of stress and increased oxytocin concentrations. Dog owners may also be more physically active than nonowners, as a result of dog-walking, with a well established link between physical activity and positive mental well-being. Most research investigating mental well-being and human–dog interactions has examined the efficacy of animal-assisted therapies to improve psychological outcomes among institutionalised individuals, such as those living in nursing homes, or clinical populations with mental illness or chronic disease. Among university students, dog-assisted interventions have also demonstrated that acute human–dog interactions have beneficial effects on measures of positive and negative affect."³

3.2 Who owns dogs up North, and why?

Dogs are popular in NZ and particularly so in Northland, where many residents and ratepayers have one or more dogs in the home. Dogs are the second most popular companion animal in New Zealand with 34% of homes having an average of 1.4 dogs. The number of households with dogs continues to rise.

Māori households are significantly more likely than other ethnicities to share their home or property with a dog (46%) and this continues to rise. The largest proportion of households with dogs are those in rural areas, with almost half (44%) having at least one dog. Given that Northland has a high proportion of Māori residents, and rural residents, this would suggest that somewhere between a third and half of our residents have a dog.

Of the people who do not have pets at home, one fifth say they would like to have one, and most of those want a dog.

Around 70% of NZ households have their dogs de-sexed, and around the same percentage have a microchip which can link them to their owner on national databases.

¹ <https://www.discovermagazine.com/the-sciences/dogs-have-co-evolved-with-humans-like-no-other-species>

² <https://www.petpositives.com.au/pets-improve-lives/>

³ Powell et al. BMC Public Health (2019) 19:1428 <https://doi.org/10.1186/s12889-019-7770-5>

Research shows that nearly 80% of homes consider their dog to be a member of their family. This is higher than for any other animal.⁴

3.3 Dogs and the housing crisis

As we are all aware, there is a housing crisis in NZ at the moment, as there is worldwide. The Far North is hard hit by this, with far too many families living in sub-standard conditions, motels, and cars.

A recent article indicated that Northland – at a mere 5% - had the lowest proportion of rental properties allowing dogs⁵. Given that we have one of the highest rates of dog ownership in NZ, this is a huge issue.

Over 30% of those who do not currently have a dog say that the reason is because their landlord does not allow it⁶.

The Northland Regional Council (NRC) advises landlords to “Put a dog-free clause in any rental agreement”, purportedly to protect native birds.⁷

3.4 Life is harder: Dogs, COVID, cost of living, and inflation

We are seeing more and more people online trying to rehome their dogs, either because of financial strain, or because they cannot rent or buy a property which allows dogs. This is a terrible thing for a dog owner – it is as if the structures in our society will not allow us to keep our children.

For similar reasons, more people seem to be dumping or abandoning their dogs, particularly when they move house. This in turn puts greater strain on our local animal rescues, who are often picking up the pieces voluntarily, and struggling to re-home friendly, lovable dogs.

3.5 Dog Abuse in the Far North: Police and SPCA assistance very limited

The SPCA operate in Kaitaia, Kerikeri and Whangārei. They have the mandate to police animal abuse in NZ, although successive governments of all persuasions have chosen to fund just a tiny proportion of their costs. This has increased under the current government, but still represents about 1/3rd of what they need to run their inspectorate. Animal lovers and rescue services will tell you that their inspectorate needs to be tripled, if not quadrupled, to deal with the issues.

In the Far North, just four qualified SPCA inspectors cover an enormous district; two more are reportedly joining their team next year. The SPCA does not work after hours. Locals are far more likely to call one of our volunteer-run rescue organisations to deal with animal abuse than to call the SPCA, as the latter seems to be hamstrung by bureaucratic limits and/or a lack of capacity to act quickly. Bay of Islands Animal Rescue, run by local legend Summer Johnson, covers the largest area⁸. Donna

⁴ This section drawn from the latest report from Companion Animals New Zealand. (2020) <https://static1.squarespace.com/static/5d1bf13a3f8e880001289eeb/t/5f768e8a17377653bd1eebef/1601605338749/Companion+Animals+in+NZ+2020+%281%29.pdf>

⁵ <https://thespinoff.co.nz/society/28-09-2022/the-absence-of-rights-for-renters-with-pets-is-just-cruel>

⁶ As cited elsewhere: Companion Animals New Zealand (2020).

⁷ <https://www.nrc.govt.nz/resource-library-archive/environmental-monitoring-archive2/state-of-the-environment-report-archive/2007/state-of-the-environment-monitoring/indigenous-biodiversity/157-case-study-1kiwi-protection-in-northland>

⁸ <https://www.newshub.co.nz/home/shows/2020/10/the-northland-rescue-group-saving-hundreds-of-abandoned-neglected-animals.html>

Doolittle's Animal Rescue focuses on Kaitaia and surrounds⁹. Both travel out of their home bases to help where they can, from Horeke to Dargaville to Whangārei. Smaller rescues such as Ruakaka Dog Rescue are also overwhelmed.

Police in Northland are reported to have extremely high turnover¹⁰. In a recent article in the Northern Advocate this was said to be due to the risk of being shot at. We have lost 17 police in the last year, despite a 20% increase in total police funding since 2017.

"Of the 17, seven were based in Whangārei, four in Kaitaia, three in Kerikeri, one each in Kamo, Mangonui and in the Northland Child Protection Team."

Dogs and animal abuse are often not a priority in an over-worked police force. This is the case even though there is a clear link between animal abuse and family violence; fear for the safety of their animals is often a reason victims won't leave their abuser. The lack of police support becomes a serious issue for those in voluntary animal rescue services, who pick up the pieces, and risk their safety trying to help many animals being starved or ill-treated. Recent examples of such abuse, as reported in the press, includes dog and horse abuse by Dora Ryan aka Lena Duncan, an Australian who now lives in Peria¹¹, and the theft, torture, and killing of two dogs used for dog fighting later dumped in Moerewa¹². This is traumatic for our communities and even more traumatic for our tireless, volunteer, dog whispering rescuers. Despite Ms Duncan having a warrant to arrest for 33 charges of animal abuse in Australia, and 17 of her NZ horses being seized by the SPCA in August, she continues to live freely in NZ. Despite information being given to police about dog fighting rings, we have not been informed of any arrests, as yet.

There is also much home-based 'puppy farming' in Northland, where people who do not know how to care for dogs properly are breeding them for profit. Breeding animals is under-regulated in NZ¹³. A recent example was in Dargaville, where BOI Animal Rescue prompted action from the SPCA after finding over 100 dogs in terrible conditions.¹⁴ Puppy farming increases as cost-of-living increases force more people into poverty, and they see it as a way to make additional income.

3.6 Community vs individually owned dogs: wandering dogs & stock losses

There are increasing numbers of articles and online comments about roaming dogs¹⁵ in Northland, particularly those which kill stock or other pets¹⁶. It is not known if these are dogs which have been dumped, or lost in the bush while pig hunting and later become 'feral'¹⁷, or pet dogs let off the chain

⁹ <https://www.nzherald.co.nz/northern-advocate/news/northland-pet-owners-struggle-with-upkeep-of-animals-as-cost-of-living-crisis-bites/VPF7KJW6REK7KHRLD2HR7LMEOI/>

¹⁰ <https://www.nzherald.co.nz/northern-advocate/news/percentage-of-northland-police-leaving-quadruples-after-pandemic-lows/AFZCPRMYDTZ6DWNPCAWO2D7MJE/>

¹¹ <https://www.newshub.co.nz/home/new-zealand/2021/05/wanted-australian-puppy-farmer-dora-ryan-accused-of-animal-neglect-in-nz-as-she-hides-in-northland-under-new-name.html>

¹² <https://www.nzherald.co.nz/northern-advocate/news/clear-evidence-of-dog-fighting-ring-in-northland-after-two-dogs-found-dead/YCSLA4YHBBU3O4ZQHCP4BF225E/>

¹³ <https://www.stuff.co.nz/national/100685428/breeding-and-selling-companion-animals-largely-unregulated-in-nz>

¹⁴ <https://www.nzherald.co.nz/northern-advocate/news/large-dog-breeding-operation-in-northland-shuts-down-after-sPCA-investigation/JWPKBNGJCTFVAORACCJNUX22A/>

¹⁵ https://www.nzherald.co.nz/northern-advocate/news/northland-couples-pet-attacked-by-loose-dogs-at-taipa-owner-sought/5BV6C3LOVOUG3L66RQPAHUTJCU/?c_id=575&objectid=12276473&ref=readmore

¹⁶ <https://www.nzherald.co.nz/nz/fifth-dog-attack-on-far-north-farm-leaves-flock-seriously-depleted/D5RFXPYMJJN5TXOLXYUFV4TMI/>

¹⁷ <https://www.stuff.co.nz/national/300553605/far-north-feral-dogs-only-four-killed-in-two-months-doc-wont-reveal-at-what-cost>

to roam by their owners, particularly at night. The trauma of stock attacks is terrible. Residents feel helpless, and that there is limited support in these instances, from FNDC¹⁸, DOC, Police and others.

The issues around wandering dogs and stock losses are likely to increase as we start to build more homes in rural areas.

In part, these issues stem from a long-term change in the way communities treat dogs. In the 1970's, dogs would walk the kids to school and then wander home alone, visiting their mates on their way home. Dogs might stay overnight at Nanna's house, by choice, and they were a focal point for community joy and annoyance. External dog control was very limited, and there were fewer people, and fewer dogs.

This has changed, and our communities need time to catch up with the fact that we cannot let dogs wander unattended. This process can be sped up by great relationships between dog educators, councils, and communities; dog welfare and safety education in schools, and community education.

3.7 The BOI Watchdogs

The BOI Watchdog group was founded in mid-2017 in response to the FNDC consultation on the review of the Dog Management Bylaw. We have 1,700 members of our private Facebook group.

"The BOI Watchdogs' focus is dog welfare. We will amplify the voices of those of us who love dogs.

We are here to right wrongs, and correct misinformation. We will ensure that the huge number of us who value dogs' lives, do not go unheard.

We created this page to raise awareness, to plan, to look hard at the evidence, to get together, and to ensure that our voices - and the unheard woofs of dogs - are promoted.

Over the last four years, other than donating, loving, fostering, and helping dogs in our district, we have ensured that a fair Dog Management Bylaw and Policy was implemented by our Council, and fought to get the euthanasia rate at our pounds down from 72% to 24%.

Our current focus is to STOP THE DOG BANS, to stop the Ministry for the Environment, DOC, NRC, and FNDC from using various means to ban dogs from being allowed to live on Northland properties. This is an appalling breach of our rights as residents and dog owners, and we will fight this with all our foot power, phone calls, media articles, political muscle, emails, protests, and VOTES until fairness prevails for our four-legged family members."



¹⁸ <https://www.nzherald.co.nz/northern-advocate/news/dogs-surrendered-after-attacks-on-sheep-poultry-in-bay-of-islands/OL7BYNRNOE5GBRHJML3D55M6BM/>

4. The FNDC Dog Bans and Restrictions

Dogs, and thus dog owners, in Northland have been banned and restricted by FNDC for many years, in a variety of ways. Most of these are not made public and we only discovered the extent of the bans and restrictions by accident. We learned more over the last few years via submitting requests under LGOIMA and OIA to FNDC, DOC, and others.

These restrictions and bans have major consequences, and in our view, must be halted.

4.1 How does FNDC ban or restrict dogs?

Ordinarily, Councils control dogs via Dog Control Policies and Bylaws. At FNDC, however, dogs are restricted through a variety of means, as below. There may be other ways in which this is occurring, of which we are unaware.

4.1.1 Via Subdivision Consents

Prior to our oral presentation to FNDC Council in 2021, LGOIMA had confirmed that matter of dog bans and restrictions via subdivision consents had never been raised at a meeting of elected members of Council. The choice to allow this to occur, since (we think) around 1998, without approval or consideration from our elected Council, is astonishing to us.

The FNDC District Services department uses two 'internal only' documents to justify their dog and cat bans and restrictions on individual applications for resource consent. Those documents were not included in this consultation, despite being used to justify the widespread banning of our pets. **We look forward to any opportunity to formally question much of the content.**

They are:

The 'Practice Note for Significant Indigenous Flora and Fauna'

- This document is an 'internal' document at FNDC, with the stated purpose "To provide guidance on when to apply conditions on resource consents restricting dogs and cats for the purposes of protecting Northland brown kiwi and other indigenous fauna". The emphasised phrase appears to have been added in the most recent version of the document.
- We were advised by FNDC formally that this note applies only on private land, and on full partitions of whenua Māori.
- The document provides a process, and justification, for dog and cat restrictions for a range of reasons, including land which is in kiwi 'present' areas, high density kiwi areas, and kiwi corridors, so that kiwi can walk from one area to another.
- Pet dogs and cats are referred to as 'pests' in this document and others.
- We object to the fact that this document has not had public review, nor elected Council review.

The 'Bay of Islands Kiwi Distribution Map – Support Document'

- This document was written/endorsed by the BOI Department of Conservation (DOC), specifically to support FNDC's dog bans and restrictions for sub-divisions. It states:

"The purpose of this document is to describe how the distribution maps are drawn to assist Far North District Council policy and planning staff to identify when kiwi protection needs to

be considered when processing resource consents. This an internal document to be used only by District Council staff.

The emphasis above is DOC's, not ours.

- This document has multiple factual inaccuracies, in our view, and from our research. It is written expressly to facilitate dog restrictions and bans, rather than to review a situation holistically. For example, it states that dogs love the smell of kiwi and find them irresistible; there is no research which suggests this which we confirmed via OIA with DOC. We reviewed multiple research papers quoted and found them wanting, and/or that their conclusions had been exaggerated. For example, the document alleges that dogs are the biggest killer of adult kiwi in Northland. They are not. OIA data from DOC proved that every year in Northland, around 10-12 kiwi are killed by dogs. Many more are run over by cars, and many are dislocated by property development.
- As this document is not in the public view, we have not been consulted on it, nor formally allowed the opportunity to question it.

Extent of the dog restrictions and bans via subdivision

So, how much land in Northland has FNDC management chosen to restrict or ban dogs and cats? The answer is, we do not know, and despite repeated requests to find this out, the best data we have been given to date is a FNDC hand-picked six-month snapshot from 2021:

“As identified earlier in this report statistics show the restrictions were only imposed on 38% of subdivision consents within the 6-month timeframe. Only 2% were a full ban without a grandfather clause being imposed to allow existing dogs and cat to be retained on site till end of life...”

*There is limited data available on cat/dog restrictions through the land use or subdivision consenting process, however through changing processes of reporting methods and a consistent application of the internal Practice Note, the resource consents team has been able to analyse statistics for the period between **January 2021 to July 2021 relating to subdivisions.***

A total of 96 consents were issued in this 6-month timeframe, of which 30 had cat/dog restrictions associated with the decision to grant the consent. Of the 30 consents only 7 consents were within an area of High Kiwi Density mapping, while 23 were within a Kiwi Present area.”

The emphasis above is ours. The repeated use of the word ‘only’ infers that FNDC is taking a position and defending it, rather than listening to the community’s concerns.

At the 2021 Regulatory committee meeting where we spoke, hoping to get FNDC management to provide an estimate of how much of our district is dog-restricted, two of six elected committee members voted against even obtaining any further information. Both have been re-elected.

In our view, it is a breath-taking arrogance to refuse to provide residents with even the most basic of facts about where they and their families are able to reside.

4.1.2 Conservation covenants

Landowners can put conservation covenants on their own properties to protect them in perpetuity. These usually have bans on dogs and cats, and in return, they get rates remissions on that land. FNDC advised us that:

For 2020/2021 the total remissions for conservation of both Northland Regional Council and the Far North District Council rates is \$674,030.84 in total. Broken down it is

· \$79,684.88 – Northland Regional Council

· \$594,345.96 - Far North District Council¹⁹

This means that dog owners are effectively having to pay extra rates to mitigate the savings made by others who choose to ban pets, forever, from their land.

FNDC management has not asked residents if they want dogs banned across the district, and nor have they requested permission for this from any of the elected Councils. For over 20 years, dogs and other pets have been – very quietly - banned or severely restricted.

4.1.3 Policies for specific areas: NIEP and Quality Ridge

We have noted in this consultation process that there are animal owning and pet limits on two zones we were not aware of. We ask FNDC to review this for legality and sanity. They are the Northland Innovation and Enterprise Hub, and Quality Ridge Retirement Village. In the latter policy, a retiree can bring a dog into the village, but when it dies, they do not have a right to replace the companion. That policy also gives the village manager the right to revoke someone's right to a dog AT ANY TIME.

4.2 The intended, and unintended, consequences of dog bans and restrictions

Well-intended planning managers may think that dog bans and restrictions are great for local wildlife. We disagree with this, as above, but we also see the many unintended consequences of those actions, daily. They include the following:

Those consequences include:

- negative economic impacts on our rohe in terms of housing and worker availability,
- humanitarian and mental health crises with people having to relinquish pets,
- animal rescue services and pounds being overwhelmed with dogs, and financially stressed
- animal rescue services being unable to find land which is suitably zoned for them to base their operations,
- frustration from real estate agents²⁰ who struggle to find pet-friendly land for their clients,
- fewer children living in homes which have dogs, which means they will increase their risk of harm from dogs because they will not learn how to care for, respect, and control their dogs,
- increase in the number of dogs being dumped in the bush due to lack of available rentals, which has a potentially serious impact on native wildlife,
- negative impact on real estate agents and developers, by reducing their potential buyer/tenant markets, even when they offer FNDC multiple means by which potential owners could control dogs effectively in high density kiwi areas (e.g. fencing, registration, micro-chipping, and de-sexing requirements),
- reduction in tourism from family members who own dogs deciding not to travel North, as their parents live in areas where their dogs are not allowed,

¹⁹ Report A3346399, Rochelle Deane, Manager - Environmental Services

²⁰ <https://www.stuff.co.nz/environment/106051069/call-to-lift-kiwiprotection-ban-on-pet-cats-and-dogs-in-the-far-north?fbclid=IwAR1FydVh4ZWkXz0-6vyBnoHs8j0FetiAVMnXLDdykoypzledxHrvxiHw4WA>

- reduction in tourism from dog-owners who are sight-seeing, as Northland’s reputation for anti-dog attitudes grows,
- less positive view of our district as a retirement area,
- legal implications for FNDC should the community decide to challenge these restrictions/bans,
- further decrease in (already fragile) trust between FNDC management and around half the community, who own dogs,
- decrease in trust between dog owners and DOC, which in turn makes us wary of their advice about dogs and wildlife,
- lessened participation in local democracies, as residents give up trying to engage with a council they believe is just not listening,
- creation of a false and destructive division between environmentalists and bird lovers, versus dog lovers, in our local communities which did not previously exist (we are all animal lovers), and
- increasing anger from dog lovers about kiwi release programmes, which are seen as impinging on our right to live in more and more townships.

5. What is behind the mistrust/what needs fixing?

5.1 Mistrust, poor relationships, negative attitudes, and adversarial approach

At present, there is little trust between council management and many dog owners.

- is negligible. We expect that things will occur against us and our pets, and that we will have to spend time looking for red flags. Some of these instances are described below.
- **Lack of trust that FNDC will care properly for pound dogs, due to repeated historical failures to do so**
- In our view, FNDC considers all dog owners as irresponsible. They ‘fight’ us. If management would just let their staff focus on community education, local solutions, de-sexing, finding ‘responsible dog ownership’ courses, supporting free puppy training in communities so owners learn how to walk their dogs on leads, supplying fencing materials at cost – there are endless positive ways to influence responsible dog ownership.
- Frontline staff have been questioned and rebuked if they dare join the BOI Watchdogs Facebook page; we are perceived by FNDC management as a hassle at best, an enemy at worst.
- FNDC seems to want to ‘win’ against dog owners. We don’t want to ‘win’! We just want FNDC to leave responsible dog owners alone, and invest time and money WITH our communities, as we do, to reduce and mitigate irresponsible or ill-informed dog ownership, and dog abuse.

5.2 Need for cultural sensitivity and respect

There are multiple cultural matters which need to be respected with regard to dogs, not only in relation to the Proposed District Plan. Our district is majority Māori, as is now our elected Council.

Genuine relationships with iwi and hapu could begin to create trust so that FNDC does not trample on the rights of Māori dog owners.

By way of example, at a meeting with a senior manager I raised the issue of sensitivity to dog registration ‘drives’ for those in the Hokianga, whose tupuna were directly harmed by the Dog Tax Wars of 1898. The FNDC manager responded with some contempt: “But that was over a century

ago!²¹ That manager has left FNDC. Please do not let those with similar contempt to remain, unless they have formal and extensive training.

5.3 Perceived bias and unfairness re Donna Doolittle's Animal Rescue Trust

Our members feel that FNDC has one set of rules for residents and another for themselves.

A recent example is where FNDC allegedly threatened Donna Doolittles' Animal Rescue with legal action, in part on the basis that her property is legally defined as a 'kennel'.

In the Operative plan, kennel is defined as: *"An establishment where dogs are bred or trained or accommodated on a paying basis and includes the accommodation buildings, exercise areas, receptions and parking areas and any ancillary buildings or facilities"*.

FNDC used the same argument, **in reverse**, for its own resource consent application for its Horeke pound in late 2020.

We have sent a complaint to the CEO of FNDC regarding their apparent double-standards in this case.

5.4 FNDC's 'Me Too' Moment? Toxic work environment, and ignoring serious harassment complaints

This issue is critical, and requires courage, focus, and diligence from our newly elected Council.

The culture of the FNDC animal management department is, in our view, toxic. There are decades – literally – of complaints that seem to go unheard, again, and again, and again. Most complainants who have contacted us are women. Instead of seeing these repeat complaints as a red flag about appalling behaviour, management seems to defend the perpetrator/s and attack the complainants.

Staff who have made complaints internally have felt hounded out. One ex-staff member was paid out, having his contract terminated early after he complained about a range of issues, verifying women's complaints. Staff who complain about witnessing or being subject to repeated sexual harassment have been formally warned about the manner in which they expressed those complaints.

It is surprising to us that the way in which FNDC has tolerated such behaviour has not resulted in a public and damaging 'Me Too' movement. These issues have already attracted the eye of an investigative journalist.

5.5 Mistrust of FNDC legal department, policies and bylaws

The appropriate legal means to control dogs is the (aptly named) 'Dog Control Act 1996'. Dog Control Policies and Bylaws flow from this Act, and this requires open, transparent consultation processes, which are often contentious, time consuming, and expensive.

FNDC's last consultation on their 2018 Dog Management Policy and Bylaw took two years, and was initially so bastardised by anti-dog sentiment that it caused a furore. The draft, which nearly passed through multiple committees and community boards before it was halted, including a proposed and immediate '1 dog per household' on the Russell Peninsula, an intention to ban dogs completely there within 10 years, and a ban on walking dogs on all the beaches in our district. A suspiciously disproportionate number of Russell dog owners did not receive notification of the consultation. Results of a FNDC survey were collated, but the conclusions did not derive from the data. Complaints were made, dog protests were held, and Northland got bad press on TV. The lead author – a former campaign manager for the Greens - resigned.

²¹ Personal communication, 6 December, 2017

FNDC had to completely re-draft the policy and bylaw and re-consult, during which time it became one of 8 bylaws which expired due to being 'out of time'. FNDC spent approximately \$40,000 confirming that our formal complaint alerting them to expired bylaws was valid²².

However, FNDC's legal department did not agree that their 2006 Dog Control Policy and Bylaw had expired, as one of our members who has a legal background had first pointed out. Cr. Dave Hookway also raised this issue in Council about the Reserves Bylaw. Many of our members then chipped in to hire a lawyer, an ex-Ombudsman now working at Chen Palmer. Leo Donnelly confirmed that contrary to the FNDC legal department's opinion, the FNDC 2006 dog policy and bylaw had expired well and truly before the new one came into being in late 2018. FNDC management still denies that this was the case. We have given up trying to convince the FNDC legal department that the current policy and bylaw will expire at end 2025.

At the November 2018 council meeting where the final draft of the Dog Management Policy and Bylaw was considered by the elected Council, FNDC managers submitted last minute changes to further ban dogs from reserves, and from Ahipara beach, without any consultation at all with residents. Those changes were passed by the Council. A judicial review may have thrown this out, but this was cost prohibitive.

5.6 History of allegations of animal abuse/poor practices at FNDC pounds

There has been a history of allegations and/or instances of abuse and ill-treatment of animals at FNDC pounds, spanning decades. This includes:

- Pound dogs were killed by gunshot²³ at FNDC pounds until a petition by local dog lover AnnMaree Mills led to change. There were allegations of staff bringing in their children to shoot dogs, dogs not being killed with the first shot, dogs being killed in front of other dogs, and dogs shot by a seated staff member, who balanced the gun on his knees while holding dogs by the scruff of the neck.
- The treatment of dogs at the Kaitaia pound was reputed to be so bad, that an SPCA Inspector parked in the driveway one morning and refused to move until she could see the dogs.
- In late 2017, Annette Ingliss from our pound working group lodged a formal complaint with the SPCA about the Kaitaia pound. Their inspector visited and issued a notice under the Animal Welfare Act, demanding change to the internal cages, the fact that dogs were not exercised, and the need for internal processes to ensure dog welfare^{24, 25}
- Annette Inglis and Vitor Bokulic began to gather statistics on FNDC pound dogs. They discovered that hundreds of dogs seemed to have gone 'missing'. Victor Bokulic still gathers FNDC's quarterly Impounding Register with details on every dog, converts the data into XL,

²² <https://www.nzherald.co.nz/northern-advocate/news/far-north-district-council-scrambles-to-fix-lapsed-bylaws/F5E6E4ROXMHMUH2TQ766V73S2A/>

²³ https://www.nzherald.co.nz/northland-age/news/petition-to-stop-council-shooting-pound-dogs/Y5NUZVEFYI3LF3MDT3CX3IZYEI/?c_id=1503402&objectid=11300703&fbclid=IwAR3PUwMvZNzSew1fWjTOr2DIY7VMBzRtJw1wLi4hcrpfFrEDmakQrEb0oPg

²⁴ https://www.nzherald.co.nz/northern-advocate/news/spca-orders-council-to-fix-run-down-kaitaia-dog-pound/DZECCJ7CCNG3T5YHSPVULXB4ZQ/?c_id=1503450&objectid=12000377&fbclid=IwAR3NBiDKCKiZw7A6S FDPVX_xog3e7D8o167WT2qu5oYLC0HjGmbtGp-JSYE

²⁵ https://www.stuff.co.nz/auckland/local-news/northland/104152498/spca-disappointed-over-far-north-council-animal-welfare-practices?fbclid=IwAR2Xba_W3QH7y1ZxUhhS-tfYD982R9Bh4HHT_4_-UHT5e3MJqzqLtUx0Gbw

and works out the euthanasia rate. It has been as high as 72% of dogs impounded being euthanised²⁶, and dropped down to 24% after much public pressure. Since FNDC closed down its Horeke Pound, the euthanasia rate has increased significantly again.

5.7 Rosie's 54 awful days in the FNDC pounds

In early 2019, a dog rescuer from Auckland (Andy Davies, The Last Lamppost) met with FNDC Animal Management to see if he could re-home some pound dogs. He was shown an emaciated bitch and her six puppies, in the back of an FNDC van, which happened to be on their way to the vet to be euthanised. He was horrified, and immediately agreed to take all dogs. Rosie had been in the pound for 54 days, and in that time five of her puppies had died, two drowning in the gutter in their pen.

We discovered that Rosie had been in the pound in Horeke, before being moved to Kaitaia pound to avoid a visit from the SPCA. We gathered extensive evidence, and lodged a formal complaint. A media storm and protest prompted action. FNDC District Services Department investigated themselves and wrote a report – and a press release - exonerating themselves. That report, entitled "Lessons Learned, but Rosie was Treated Well," contained outright falsehoods. The manager who wrote it was later promoted; he has now left council. We then complained to the SPCA who initially agreed to take the case up, telling us that their Board was horrified and was ready to act, then backed out and handed it to MPI. We provided information on Rosie and other allegedly abused dogs to MPI. They asked us not to bother sending them more abuse allegations, and undertook an inspection of the Kaitaia pound, after giving FNDC notice well in advance. FNDC had already stated in reports that this pound was not 'fit for purpose' and did not meet the required standards in the Code of Welfare for Temporary Housing of Companion Animals, or the Dogs Code of Welfare. FNDC passed that MPI inspection.

We lost faith in the SPCA and MPI. It has not returned.

We now try to influence change at the FNDC pounds through direct complaints, contact with elected members, Facebook posts which encourage change through community pressure, and media attention.

5.8 Legal threats made by FNDC over Facebook post

After Rosie's ill treatment, Cr. Dave Hookway posted on Facebook calling for the resignation of a FNDC General Manager. FNDC then hired external lawyers to send a letter threatening action for defamation against him, and against the Administrators of a local Facebook group where he had posted²⁷.

5.9 Melka Kennels and the Public Works Act 1981

We do not know which (if any) part of the District Plan enables use of the Public Works Act, 1981? We ask that the elected Council develop procedures to ensure that it is used judiciously, and not used by FNDC to gain unfair advantage over residents.

This occurred, in our opinion, with the purchase of Melka Kennels in Kaikohe in 2021. What began as a good attempt by FNDC to provide temporary care for dogs until a permanent pound is built, became yet another PR disaster, with the prior owners feeling bullied²⁸, and other potential buyers feeling

²⁶ https://www.stuff.co.nz/national/101360491/call-for-urgent-improvements-to-far-north-dog-pounds?cid=facebook.post.101360491&fbclid=IwAR3niuAc-wz-5AZPwq6TgGr2lpKpww5Opyq1N_4XAzEQ5m4bTvtd5d-BYOM

²⁷ <https://www.stuff.co.nz/national/117830089/far-north-district-council-takes-legal-action-against-local-facebook-administrators-after-dog-post>

²⁸ <https://www.nzherald.co.nz/northern-advocate/news/council-buys-kaikohe-melka-kennels-bay-of-islands-watchdogs-criticises-methods/C4GAFS2ONS7SO5EC3EQRQTY2I/>

shafted by their own council. That building was then left unattended²⁹, with many fittings stolen mysteriously, before the existing home and kennels on the land were sold off.

5.10 Difficult, time-consuming, bamboozling consultations

We are pleased to see that 'plain language' is being encouraged by central government³⁰. FNDC may wish to review that new legislation for some new ideas.

We are tired of spending hours sifting through OIA requests to DOC, and LGOIMAs to FNDC, trying to understand what is going on for 'internal use only'.

The Proposed District Plan took full time staff years to devise, and yet we had just 12 weeks to wade through it and respond, after-hours.



The stack of printed documents for us to consider is taller than some of our dogs.

We fear missing some clauses, or policies, or (not attached, for 'internal use only') practice notes, which might further harm our right to live in Northland with our furry family members.

Thank you for your consideration.



²⁹ <https://www.nzherald.co.nz/northern-advocate/news/outrage-after-northland-councils-kennel-facility-left-in-disrepair/RJKX3HRM3ZDQOUP5U3XUPMO2ZU/>

³⁰ <https://www.theguardian.com/world/2022/oct/20/new-zealand-passes-plain-language-bill-to-jettison-jargon>