

Application Number: HRE05002  
Submission Received: 30 January 2007

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Name of Individual or Organisation: .....

Contact if organisation listed:

Address:

new zealand

Phone:

Fax:

Email:

Request to be Heard: I Wish to be Heard

Decision: to decline application

Reason: i have serious concerns of affects on rongoa (TRADITIONAL MAORI MEDICINE AND KAI )ie piko-piko, tuna (eel) inanga ( white bait) esp Long/Short jawed kokopu.

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Name of Individual or Organisation:

Contact if organisation listed:

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Phone:

Fax:

Email:

Request to be Heard: I Wish to be Heard

Decision: COMPLETE ban on the use of aerial 1080. It should only be used as instructed by the manufacturers, i.e. used only in secure bait stations and burrows in the ground. 1080 IS NOT RECOMMENDED FOR AERIAL APPLICATION.

Reintroduce the bounty system for possum control as well as further use of cyanide in bait stations and traps. This would also benefit many people by giving them a source of employment.

Where deer numbers are unable to be managed by means of recreational and/or commercial hunting methods, they should be controlled (not exterminated) by aerial shooting and not by poison. Deer can always be controlled by the use of helicopter gun ships. This has been proven.

Reason: I have 47 years experience working as a commercial hunter as well as a recreational hunter. This includes working as a deer culler for the NZ Forest Service, then going on to being self-employed as a wild game meat hunter, and at times working as a possum hunter, being licensed to use cyanide and working for the Marlborough Redwoods Rabbit Board.

Through obtaining my cyanide licence I was trained to recognise Tb in animals. During all my hunting experience I have never seen a Tb infected feral animal in areas away from farmland. Tb is a farm area and transport problem, and Tb should not be used as an excuse to aerial spread poison throughout the rest of the country.

I was employed with the Nelson City Council for 21 years. Part of

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my job included some maintenance of water catchments and forestry blocks. This included some animal control, as well as assisting and managing staff in a wildling pine eradication project. Through field experience over the years, I consider myself adequately experienced in the knowledge of wild animal life and control.

I still hunt today as a recreational hunter, hunting also to provide meat for the family, mainly targeting goats, due to the lack of deer numbers in the Nelson/Marlborough area..

I was involved in a private survey which was carried out after a 1080 drop over a large area. Our findings were more dead birds than possums. We noticed that some 1080 pellets had broken up into small pieces falling through the bush canopy therefore making them more palatable to birds. We noted not only dead birds, but others flying about awkwardly and knocking into trees, which indicated that in their dying stages they were losing the ability to fly properly. I can fully see why "The Applicants" are NOT using 1080 air drops in sanctuaries and island areas. Denying that 1080 air drops do not kill birds is ridiculous in the eyes of people with even some field experience.

Other friends have reported to me finding large numbers of native snails which were dead in their shells after 1080 drops.

It was pointed out to me some years ago in a local body Poisons Manual, that a higher than normal concentrated dose per 1080 pellet was now being used. I realised that targeting deer was the reason. This results also in a bigger by-kill such as birds.

I have a big concern over 1080 contaminated meat. There are more areas becoming cleaned out of animals and unsafe to hunt as time goes on.

1080 is only used in bait stations in other countries as it is not recommended for aerial use, therefore this method must be considered unsafe.

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**Application Number:** HRE05002  
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**Name of Individual or Organisation:** Taicri Branch of Federated Farmers

**Contact if organisation listed:**

**Address:**

New Zealand

**Phone:**

**Fax:**

**Email:**

**Request to be Heard:** I Do Not Wish to be Heard

**Decision:** The continued use of 1080 as a method of controlling pests.

**Reason:** I wish to lodge a submission on behalf of the members of the above branch in support of the continued use of 1080 as a tool in the fight to control rabbits and possums. Many of our members use 1080 to control rabbit numbers to Regional Council standards. The use of 1080 appears to be the most effective way of controlling rabbit numbers. Due to the ongoing programme of possum control by the Animal Health Board, which may include approximately 10% of the area being controlled with aerial 1080, many of our members no longer have the fear of TB in their herds. As 1080 is the only pesticide which can be applied aerially, and due to some of Otago's terrain, the loss of this tool would certainly lead to an increase in the level of Bovine TB.



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Name of Individual or Organisation: I Do Not Wish to be Heard

Contact if organisation listed:

Address: \_\_\_\_\_  
\_\_\_\_\_  
NZ

Phone:

Fax:

Email:

Request to be Heard: I Do Not Wish to be Heard

Decision: A total ban on 1080 .If you put a price on any thing you can make it  
extincted as the possum numbers drop increase the price payed per  
set of ears along with the fur you can make a living doing possums  
fill time.

Reason: I think 1080 should be banned for many reasons killing a large  
numbers of our native birds is just one .This poison has been  
introduced into the NZ food chain.We don,t know the long term  
affect its going to have on use .I have seen 1080 kill and it must be  
the most painful way to die.I Don,t know why the SPCA haven,t ban  
it.Clubing a helpless baby seal with a white coat to death has nothing  
on 1080.When the greater NZ population find out about 1080 heads  
will roll.You are using a poisoned vegetable to target a herbivore and  
in the process killing carnival:eg killing ever thing-NZ Falcons -  
Moreporks etc  
etc

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Contact If organisation listed:  
Address:

NEW ZEALAND

Phone:  
Fax:  
Email:

Request to be Heard: I Wish to be Heard

Decision: COMPLETE ban on the use of aerial 1080. It should only be used in secure bait stations and burrows.

An independent study on the effect of 1080 on the soil; bacteria and other micro-organisms.

An independent study on the effect of 1080 on humans.

Reason: 1080 is a greater risk to NZ meat and food exports than Tb.

Less detrimental methods of pest control should be used, e.g. (1) the bounty system for possum control. This was once successfully used in NZ and many would find this an employment opportunity. (2) Cyanide poisoning in bait stations and/or trapping.

No consideration seems to have been given to the nature of death animals (even possums) experience as a result of eating 1080. Cyanide is a more humane method as it is very quick in comparison to that of 1080.

Deer should not be targeted with 1080. If 1080 is used in secure bait stations deer (and other unfortunate animals) would not be victims of a so-called by-kill. In areas where recreational and/or commercial hunting is not sufficient to MANAGE deer numbers, shooting from helicopters has already been proven successful when numbers were genuinely out of control.

The full impact of the adverse effects of 1080 on many aspects of NZ life has not been given a fair representation by the applicant. There is

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an increasing restriction of hunting areas for the recreational hunter; reduced opportunity for food-gathering; a fear of contaminated meat long after the "safe"™ time period; export of wild venison is no longer viable due to the increase in poisoned meat; dogs are dying from not only eating the pellets, but from eating animals and birds killed by 1080; a lack of bird song in areas recently aerial dropped with 1080; NZ is rapidly losing its clean green image as widespread use of a deadly poison is "not a good look"™.

There is an increase of immune system illnesses in this country and the indiscriminate use of any poison cannot be held blameless. There have been cases in the past where a substance has been declared SAFE, but later withdrawn from use due to further study disclosing an adverse effect on humans.

1080 is only used in bait stations in other countries as it is not recommended for aerial use, therefore this method must be considered unsafe.

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**Contact if organisation listed:**

**Address:**

New Zealand

**Phone:**

**Fax:**

**Email:**

**Request to be Heard:** I Do Not Wish to be Heard

**Decision:** 1080 be banned for use in New Zealand

**Reason:** I can not support a poison that:  
1. Has no known antidote  
2. Kills non target animals down the food chain  
3. Tarnishes my countries clean and green image  
4. Is banned by most other countries in the world

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**Contact if organisation listed:**

**Address:**

New Zealand

**Phone:**

**Fax:**

**Email:**

**Request to be Heard:** I Do Not Wish to be Heard

**Decision:** I would like other options to be further explored as a means of controlling possums & other animals labeled as "pests" in New Zealand and the use of 1080 either banned or stricter rules on the areas where it can be used (as far as only in very remote areas)

**Reason:** I wish to add my voice to the submission process re the application to further use 1080. I believe 1080 is a very dangerous toxin to use and would prefer to see a safer option used to control vermin.

The risk of 1080 being carried outside of the drop areas is great, especially travelling via poisoned creatures (ie possums with the sometimes slow kill rate) or by predators carrying their prey some distance. Dogs especially are very prone to fatalities if 1080 is ingested & there are risks to other non target species.



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Name of Individual or Organisation:

Contact if organisation listed:

Address:

New Zealand

Phone:

Fax: n/a

Email:

Request to be Heard: I Wish to be Heard

Decision: I would like a 100% guarantee by ERMA that everything is known about 1080 and it is not going to result in some dreadful calamity within the New Zealand environment.

Reason: I implore ERMA to ensure that no danger exists to Humans in regards to poison in the food chain, in particular wild animals. If it can impact the food chain then it must not be allowed to be used.

This product / poison now has a significant commercial industry requiring the continuance of the 1080 distribution 'to poison the environment'. They are enthusiastic to see the industry continued for income purposes. This extends to helicopter providers, monitoring people, and of course Regional councils, AHB and DOC. A lot of jobs in this "industry" rely solely on the continued 1080 poisoning of the environment.

To this extent a fallacy has been generated to market 1080 not as a poison, as a treatment of the environment in line with fertiliser, believing that a perceived benefit will increase the environmental value. The truth is the deliberate entry of poison into the environment only creates another introduced factor to which the environment is forced to react to and somehow assimilate. The fact I understand is that 1080 has no known antidote. If a lethal dose is encountered the only result is death.

My concern is that the environment potentially is being dosed with poison that may build up in living tissue and be passed within the food chain, to non-target species and even humans.

I understand that 1080 in certain circumstance does break down

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through the Krebs cycle. What I do not understand is what happens to the poison where it avoids the Krebs's break down process.

If for any reason it lingers in the environment and can impact on non targeted victims either lethally or sub lethally, then you must not allow its use to be continued.

Please be 100% certain that no possibility exists that any non-targeted impacts with in the environment can occur.

Also be very aware this poison is feared through out the world, with the exception of New Zealand. This supposed scientific arrogance is extremely alarming to me as a New Zealand citizen and member of the public.

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Name of Individual or Organisation:

Contact if organisation listed:

Address:

New Zealand

Phone:

Fax:

Email:

Request to be Heard: I Do Not Wish to be Heard

Decision: A total ban on the use of 1080 poison.

Reason: 1080 use is a disaster waiting to happen. As I write this 100 kilos of toxic bait has gone missing from the West Coast. If 1080 residue is picked up in our export meat it will cripple our meat industry overnight. This is apart from irreparable damage that I feel it is doing to various different native species, be it fish, invertebrates, frogs, reptiles and mammals. Very little study has been done on the effect that 1080 has on these. The kiwi population in the Tongariro State Forest is now a fraction of what it was before the recent and mid 90's 1080 drops. I don't believe 1080 directly affects kiwis but after the first drop the musteline population changed their diet from rat to kiwi, and also another contributing factor could have been starvation caused by the bush worms dying from 1080 poison. Why is I do not hear a Kokako in the bush at Bennydale since the two 1080 drops there? I used to hear several. Are the Kakariki still alive in the Whirinaki after the recent 1080 drop there? The Pekapeka have not been seen on Clements Mill Road since the 1080 drop there. I need to know - Who is going to be accountable for the continued use of 1080 poison? Why is there not a strict Code of Practice for the use of 1080 poison which includes monitoring operations by an independant body? Applying 1080 poison by air is causing by far the majority of the problems.



**Application Number:** HRE05002  
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**Name of Individual or Organisation:** Clutha Agricultural Development Board

**Contact if organisation listed:**

**Address:**

New Zealand

**Phone:**

**Fax:**

**Email:**

**Request to be Heard:** I Do Not Wish to be Heard

**Decision:** We support the applicants in their wish to continue using 1080 for pest control

**Reason:** The CADB is an organisation with over 200 members, involved in the promotion of sustainable agriculture in the Clutha District. This district and it's farmers were severely affected by the infection of it's cattle and deer herds with TB during the past two decades. A concerted and comprehensive programme of reduction in possums and mustelids has largely removed TB infection from our district. 1080 was and is an integral part of that programme as we have large areas of native and exotic forests where aerial application is the most economic and effective method of control. Farmers and the general population have recognised the enormous improvement in the health of the remaining native forest that has occurred with the reduction of possum numbers. They also realise the importance of 1080 to DOC as it seeks to protect rare birds such as mohua in our reserves. We consider the risks associated with the use of 1080, namely reduction in deer and pig hunting opportunities and accidental poisoning of domestic animals to be relatively minor if all appropriate measures are taken during application.

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Name of Individual or Organisation:

Contact if organisation listed:

Address:

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New Zealand

Phone:

Fax:

Email:

Request to be Heard: I Wish to be Heard

Decision: All licences regarding the production, distribution and use of 1080 be terminated forthwith.

Reason: Code:HRF05002. I oppose the application Re:production,distribution and use of 1080 within NZ. Reasons being 1080 is a cruel and inhumane method of killing. 1080 has unexceptable off target kill factor. The users of 1080 have been dangerous and irresponsible, have little understanding or accountability for the damage being done. 1080 is an internationally outdated, unexceptable product that has no place in an environmentally modern NZ.  
While I have respect for the submission proccss in this matter I know of hundreds of people not making submissions that have strong and valid oppinions against 1080 but the process is beyond them for various reasons. However they would come forward if approached at a local level. They represent possibly the largest user group of outdoor NZ.

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**Name of Individual or Organisation:**

**Contact if organisation listed:**

**Address:**

New Zealand

**Phone:**

**Fax:**

**Email:**

**Request to be Heard:** I Do Not Wish to be Heard

**Decision:** Cease and prohibit aerial application of 1080

**Reason:** Thank you for the opportunity to submit on the 1080 review process.

I strongly oppose the indiscriminate aerial application of 1080 poison.

The blanket broadcast of such a deadly poison is dangerous for all living animals in the drop zone, including native species, and deer, wild pigs and other wild game food species. As a hunter, I value these animals enormously and regard the wholesale poisoning of these game animals as a tremendous loss of asset.

I spend a lot of time hunting in the New Zealand back country and, like many New Zealanders while I enjoy the views and outdoor experience, hunting is the primary reason for venturing onto public conservation land. Without the game animals I would not go. I have hunted in areas that have been 1080 poisoned in recent years and the game animal populations are so low that I won't go back.

To me, and I believe many New Zealanders, there is a great cost when populations of game animals are decimated by aerial application of 1080 poison.

I also go to great lengths to ensure my dog is safe to take in the bush to add to the hunting experience. She is very well trained, under control at all times and regularly undergoes avian aversion training to ensure she is safe to take into the bush. With aerial application of 1080, I am often fearful that my dog will eat a bait or contaminated carcass. In May 2006, we had prefeed dropped on us while hunting

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on public land and despite my efforts to stop the dog eating any baits, she managed to chew one before I could stop her. I had no idea whether this was live bait or prefeed, as there were no warning signs in the area and the hunting permit we were issued with did not have a pesticides summary attached.

While I later found out the baits were prefeed, it highlighted to me the poor and inconsistent nature of the notification process. Therefore I am often anxious while hunting with my dog that we may be in an area where 1080 has been applied but we may not know about it. At worst this may result in the loss of my highly trained dog ... at best it spoils the hunting experience as I am constantly thinking about the possibility of 1080 being indiscriminately blasted across the country and my dog being poisoned.

I request a ban of aerial 1080, and restriction to use only in secure bait stations and burrows. The most dangerous use of 1080 is its aerial distribution, because it kills a wide range of animals indiscriminately. This is recognised in the USA, Canada, and Australia, where aerial 1080 is banned.

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Name of Individual or Organisation: Taheke Hapu Resource Management Roopu  
Contact if organisation listed:  
Address:

Aotearoa

Phone:

Fax:

Email:

Request to be Heard: I Wish to be Heard

- Decision:
- 1.  Minimal aerial dropped 1080 operations, no less than once every five [5] years and that the positive and negative effects of the operations be reviewed every five years via consultation with all affected parties [including public]
  - 2.  That the alternative methods of ground control be adhered to as of Controlled Substance Licences and HSNO Act and where ever feasibly possible that the alternative methods of pest control be considered first and preferred option, allowing for the promotion and incentive of employment and increased wide spread participation for landcare pest control practitioners.
  - 3.  That independent prior research assessments and monitoring after operations be provided with consideration given for Maori Environmental Risk Management Representatives physical involvement and active participation. This provision will alleviate misconceptions, misunderstandings and suspicion of mismanagement with regard to cultural, traditional and spiritual concept and perspective of the Maori worldview.
  - 4.  We also humbly request your consideration to allow our organisation the right to exercise Kaitiakitanga me Tino Rangatiratanga as set out under Te Tiriti O Waitangi by exempting our rohe [area] from continued 1080 aerial operations.
  - 5.  Additionally consideration for employment creation via ground pest control operations especially in isolated rural communities that are disadvantaged and have a low socio economic decile rating.

Reason: Our community does not support the continued use of 1080 by aerial dropped operations, the reasons and main concerns are â€œ

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1. □ As private landowners we do not agree to our land being continually dressed with toxic poison, in principle the long term impact and effects will eventually take its toll and observations from grassroots people confirm suspicion that whenua is holding toxicity
  2. □ That the advocates for 1080 have not physically demonstrated proof that 1080 is safe in drinking water eg. consume a glass of water with a pellet of 1080 in it
  3. □ We could not find any medical data or substantiated evidence that proves 1080 water contaminant has a contribution factor to human diseases or illnesses. To the contrary, members of a neighbouring community had complained about an outbreak of boils after an aerial 1080 drop over the vicinity of their community water source catchment. They had also discovered non target species had died around the water catchment.
  4. □ There appears to be a lack of independent monitoring reports following 1080 drops [eg. who are independently monitoring the monitors, DoC & AHB]
  5. □ Our regions ngahere [forests] and terrain are suitable for pest ground control and we are currently planning to promote employment initiative for our skilled and qualified pest controllers. This work will also involve native bird identification and monitoring.  
If aerial drops are allowed to continue, they will most certainly eradicate what endangered species we have left and have not been allowed the opportunity to be located.
-

**Application: HRE05002**

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**From:** [redacted]  
**Posted At:** Tuesday, 30 January 2007 12:10 p.m.  
**Posted To:** 1080 Mailbox  
**Conversation:** 1080 submission  
**Subject:** 1080 submission

Dear ERMA

I support re-registration of 1080 because it is the best solution currently available to protect large areas of forests and native species from introduced pest species. In the last couple of decades 1080 has been the key factor that has allowed New Zealand's forests to come alive. Use of 1080 can be the difference between survival and extinction of some of our most critically endangered species and for that reason I support re-registration.

Yours Sincerely

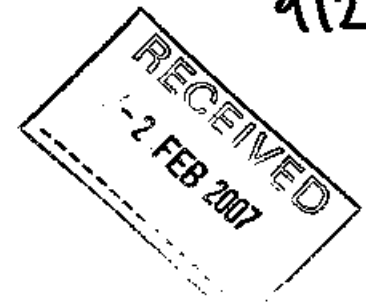
Phone  
mobile

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**From:**  
**Posted At:** Tuesday, 30 January 2007 5:23 p.m.  
**Posted To:** Junk E-mail  
**Conversation:** Submission  
**Subject:** Submission

I do not wish to speak to my email submission.

Phone  
mobile



**Application by Animal Health Board, Department of Conservation HREO5002 to reassess sodium fluoroacetate (1080) and substances containing 1080 (a vertebrate toxin). The applicants wish to continue to use 1080 for control of possums, wallabies and rabbits, and for targeted by-kill of rodents and mustelids (mainly stoats).**

Westland Milk Products welcomes the opportunity to make a submission in support of Application HREO5002 for the continued use of sodium fluoroacetate (1080) and substances containing 1080.

#### **Reason for Submission**

Westland Milk Products is an independent dairy company located on the West Coast of the South Island. It has a supply region extending from Karamea in the north to Franz Josef in the south and inland to Springs Junction. We have 380 farms supplying milk to our manufacturing site in Hokitika.

The future of dairying on the West Coast of the South Island relies on the ability of our suppliers, providers of dairy grazing and the farming community to be able to continue to farm profitably and sustainably. The West Coast economy is more reliant on a successful dairy industry than any other region in New Zealand. Westland Milk Products is one of the biggest income earners and employers on the West Coast with significant direct and indirect economic impacts throughout the region. It is an integral part of the West Coast economy and will continue to be so into the future.

The New Zealand dairy industry is committed to a control and eradication programme of bovine tuberculosis in New Zealand. The industry supports the Animal Health Board (AHB) Bovine Tb National Pest Management Strategy. The viability of the current bovine Tb Pest Management Strategy relies on the availability of 1080 to the AHB to undertake cost effective bovine Tb vector control. The financial contribution made by the Dairy Industry to the AHIB reflects this commitment.

The dairy industry is one of New Zealand's largest exporters and its significance to the New Zealand economy can not be under stated. As a signatory to the OIE (Office International Epizooties) Terrestrial Animal Health Code, New Zealand has legal requirements to comply with the Code in order to be involved in the export of live animals, meat, meat products and milk and milk products. The National Pest Management Strategy is essential in meeting the dairy industry requirements for access of dairy products into most export markets.

The Animal Health Board has a clear goal - to achieve official freedom from bovine Tb by 2013 (less than 0.2% infected rate). It is vital to the dairy industry that bovine Tb is reduced and possum control plays an essential part along with stock management and movement of cattle and deer herds. This goal equates to having less than 19 infected herds by 2013.

Bovine Tb continues to be a problem on the West Coast of the South Island. The West Coast with its vast tracts of native bush and mountainous backdrop provides an ideal haven for possums and other vectors. The West Coast has the highest infection rate nationally and about half of the country's Tb infected dairy herds. Only recently have the West Coast figures started to come into line with those elsewhere in the country. In June 2006 there were 52 infected herds as compared to almost 250 infected herds a decade ago. The benefits of the increased investment into Tb are starting to show however the momentum must be maintained to meet Tb freedom status.

The vector control programme on the West Coast is a significant logistical exercise that delivers considerable benefit to the region and is the largest possum control programme in the country. The West Coast AHB has an integrated possum control programme to provide long lasting protection. The current programme has been developed to provide the best chance at reducing the spread of Tb from possums to our farmed cattle and beef herds. Integral to this is the planned aerial application of 1080. Ground control work around bush farm margins using a variety of methods ( such as cyanide, bait stations, trapping) is also undertaken.

Seventy eight percent of the West Coast control programme is via ground methods while aerial control methods make up 22 % of the programme, however the aerial method is currently the only effective and economic method for reducing the infected possum populations in inaccessible rugged hill and mountainous countryside. Ground possum control methods in rugged areas pose major safety issues to staff/contractors while flying offers a much safer alternative.

The benefits to the AHB programme are maximised if the AHB is able to carry out this work as quickly and efficiently as possible and the availability of 1080 along with ground control methods is integral to this. Changes to the strategy which could preclude the use of 1080 or any of the available methods of control plus prolonged delays in carrying out these control measures would put the programme at risk. The significant gains that have been made will be lost and the impacts will be felt both locally and nationally, both economically and environmentally.

While the AHB aim is to protect our regional economy by reducing the incidence of bovine Tb in dairy, cattle and deer herds it also has the potential to deliver long term conservation benefits in conjunction with the Department of Conservation possum and pest management programme. These benefits are already being

seen in the increased regeneration and enhanced health of existing native plants and the increased numbers of native bird and invertebrate populations in the areas where aerial methods have been used.

Westland Milk Products recognises that aerial dropping of 1080 baits is not the only tool in possum control management but currently is the most cost effective and safe method of control for those areas that can not be controlled from the ground. Without access to 1080, the current pest management programme and the aim for a Tb free dairy industry would be put in jeopardy.

Westland Milk Products recognise that over time, new and equally or more effective and more targeted possum control methods may reduce the ongoing reliance on 1080 application, however until this time and the efficacy of new methods can be determined, 1080 remains the method of choice for the reasons outlined in the application. The AHB with industry support continues to support research into alternative control methods.

Westland Milk Products supports this application based on the effectiveness of the programme to date. There is sufficient information available, knowledge of and experience with the use of 1080 to grant its continued use given the key mitigation measures already in place, coupled with the stringent operating procedures and conditions.

**WMP supports the application for reassessment of 1080 and seeks that ERMA grant the joint application HRE05002, made by the Animal Health Board and Department of Conservation.**

**Westland Milk Products wishes to be heard in support of this application.**

Westland Milk Products  
PO BOX 96 HOKITIKA  
Ph 03 756 9800  
Fax 03 755 8208



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RECEIVED  
- 2 FEB 2007

### Submission Form

Please feel free to write on or photocopy this form.  
We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission \_\_\_\_\_  
Contact person \_\_\_\_\_  
Contact address \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

This submission is about -  
Application number: HRE 05 002  
Application by AHB + DOC (applicant name)  
to Reassessment of Salmix Fluoroacetate (application purpose)

Reason for submission (attach supporting information) Wish to have 1080 available to be used for pest control.  
  
  
  
  
  
What decision do you seek (optional) Support the reassessment of 1080  
  
Do you wish to be heard in support of your submission?<sup>1</sup> (at a public hearing)  Yes  No

Signature \_\_\_\_\_ Date 29th/1/07

Post to: ERMA New Zealand  
P O Box 131, Wellington  
Fax to: ERMA New Zealand  
(04) 473-8433

<sup>1</sup> Please note that if any submitter indicates they wish to be heard, the Authority is obliged to hold a public hearing.

# Hazardous Substances and New Organisms Act 1996

**In the matter** of application by the Animal Health Board and the Department of Conservation to have Sodium Monofluoroacetate reassessed.

## Intro<sup>tion</sup>

### 1.1

South Otago.

1. I am a Sheep and Beef Farmer from Milton,

- 1.2 I have been a member of the Otago Regional Animal Health Committee (ORAHC) since 1998. I am currently the Otago Federated Farmers Meat & Fibre representative on the ORAHC. I was Chairman of the ORAHC from 2002 to 2005.
- 1.3 I am a Director and past Chairman of the Clutha Agricultural Development Board, a community based organisation that facilitates and manages projects that assist the agricultural community in the Clutha District to grow and develop.
- 1.4 I am an Otago Regional Councillor.

- 2 My submission is based on my experience as a farmer having 1080 used on our property and in neighboring forestry land and my extensive experience dealing with landholders, members of the public and hunters during consultation meetings preparing for, during and post AHB aerial 1080 operations in Otago.
- 3 My submission will support the Animal Health Board and Department of Conservation application.

## Our History with 1080

Our property had carrot laced with 1080 used on it to control rabbits the winter before we purchased it in 1993 to control a large rabbit problem. Council staff laid further bait in a small area the following winter to control a small pocket of rabbits to allow us to successfully plant and establish pine trees. At the same time they put bait stations along several kilometers of boundary fence to control possums in the neighboring gorse and scrub.

This was our first experience of 1080.

The following winter one of our cattle reacted to the Tb test. Our herd was classified as infected which has major implications for the management of the property and farming options available to us until we had cleared Tb from the herd.

I started gathering information on Tb and found that South Otago was full of Tb with many cattle and deer herds either had been or were currently infected with Tb.

It was clear that the possum was the primary vector spreading the disease, we began controlling possums on our property by night shooting and poisoning.

We however completely underestimated the size of the problem, around the district any possum control that was occurring was sporadic and poorly organised which meant it was ineffective.

The key to the AHB programme is the ability to control pests in the forestry and scrub lands that border farms. The only way to achieve effective control is by aerial application of 1080.

We have had 1080 used on or next door to our property five times in the last 12 years. We are aware of the risks to our stock and dogs and have managed that risk appropriately. The result is we have not lost any stock or dogs to 1080 poisoning.

### **Issues**

There continues to be negative publicity about 1080, the issues that get the most publicity are the by kill of deer which annoys the deer hunting fraternity, the loss of a dog which has scavenged a carcass containing 1080 post an aerial operation and the risk to the environment, water ways and markets for our agricultural produce.

All of these issues are driven by emotion and often the people involved are making highly inflammatory claims in the media that completely ignore the results of the large amount of scientific study done on 1080 over the years.

### **Benefits of 1080**

After researching and reading some of the papers on 1080 I am aware that when used under the comprehensive regulations that govern the use of 1080 it is a safe toxin, it does not bio accumulate and degrades in both water and soil to harmless by products. It also breaks down quickly in animals that receive a sub lethal dose, thus the risk to our export markets is almost nil.

1080 is very cost effective; this is a huge benefit to our economy.

1080 is the only toxin available for aerial use, this is vital as one of the tools to control rabbits on extensive rabbit prone farm lands.

The AHB's Tb control programme has reduced infected herd numbers by 90% in the last decade; this has only been possible by controlling possums to a uniformly even level over large areas. Aerial application of 1080 is the only to achieve this in the many large areas of scrub and bush in New Zealand.

The success thus far of the Tb programme gives farmers land use options that were not their when Tb was rampant, there is now a very low risk that their business will incur the disruption and financial costs that a Tb infection in their herd brings.

The resultant benefits to Conservation have proven to be enormous, I regularly hear from farmers about the increase in the native bird populations and the regeneration of the bush in areas such as the Catlins as a result of possum control by aerial 1080.

### **Summary**

The use of 1080 under current regulations results in significant benefits to the environment, the economy and wider community without any significant adverse effects. This safe toxin is an essential tool for pest control.

I ask that ERMA treats the application for the reassessment of 1080 favorably.

1/8

29/1/07

9129

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
NGĀ KAIWHAKATŪPATO WHAKARARU TAIAO



### Submission Form

Please feel free to write on or photocopy this form.  
We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission \_\_\_\_\_  
 Contact person \_\_\_\_\_  
 Contact address \_\_\_\_\_  
 Phone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

This submission is about -  
Application number: 1080 Reassessment HRC 05002

Application by \_\_\_\_\_ (applicant name)  
to 1080 Reassessment (application purpose)

Reason for submission (attach supporting information)

① New information on 1080 PMAKs in water will soon become available from Ms Natalia Foronda PhD thesis. It would therefore be prudent to defer finalising the review, to avoid having to revise the 1080 protocols

② The protocols for aerial distribution of baits do not make full use of changes in technology since the original protocols were drafted. Flight paths should be mapped using a GIS position monitor. Remedial action should be specified that should be taken if the aircrafts course deviates from the specified flight path.

What decision do you seek (optional) ① Delay reassessment until new data are available from Natalia Foronda Ph.D.  
② Improve aerial dosing management protocols

Do you wish to be heard in support of your submission?<sup>1</sup>  Yes  No  
(at a public hearing)

Signature [Signature] Date 30 Jan 2007

Post to: ERMA New Zealand P O Box 131, Wellington Fax to: ERMA New Zealand (04) 473-8433

<sup>1</sup> Please note that if any submitter indicates they wish to be heard, the Authority is obliged to hold a public hearing.

9130

Please feel free to write on or photocopy this form. We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission

Contact person	
Contact address	
Phone	Email

This submission is about 1080 AERIAL APPLICATION

Application number: HRE
Application by: (applicant name) h
for: (application purpose)

Reason for submission (attach supporting information):

I am against 1080 usage in NZ.

What decision do you seek (optional)

Ban 1080 usage in NZ, & bring in a bounty for trapping possums.

Do you wish to be heard in support of your submission? (at a public hearing)  Yes  No

Signature [Signature]	Date 25/01/07
-----------------------	---------------

Post to: ERMA New Zealand  
P O Box 137, Wellington

Fax to: ERMA New Zealand  
(04) 914-0433

9131

**SUBMISSION FORM**

Please photocopy this form. We have designed it so that you do not have to use this form

F

5

Name of person/organisation making the submission

Contact person

Contact address

Phone

This submission is about

Application number: 1080 for Pest Control in New Zealand


Application by: (applicant name) D.O.C

to: (application purpose) Reassessment of 1080

Reason for submission (attach supporting information)  
Submitter attended E.R.M.A.'s 1080 Generic Issues Hui  
2nd + 3rd November 2006  
Outcomes of Hui identified in summary report -1080 Hui.doc  
Consequential effect being this submission

What decision do you seek (optional)  
Recognition of equitable participation and partnership of Iwi/Maori  
in decision making. Notifications to Mana Whenua and Tangata Whenua  
prior to any uses of 1080. Independent Research and monitoring  
conditions to apply.  
Reassessment every 10 years.

Do you wish to be heard in support of your submission? (at a public hearing)  Yes  No

Signature  Date 30/01/2007

Post to: ERMA New Zealand P O Box 131, Wellington Fax to: ERMA New Zealand (04) 914-0433

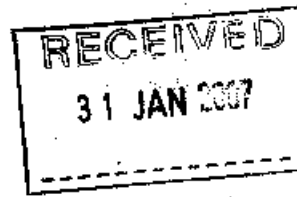
New  
Zealand  
Aotearoa



26<sup>th</sup> January 2007

9132  
FIORDLAND 9133  
ECOLOGY HOLIDAYS

Ruth & Lance Shaw: PO Box 40, Manapouri  
Southland, New Zealand  
Phone/Fax 64 3 249 6600  
www.fiordland.gen.nz  
Email: [eco@extra.co.nz](mailto:eco@extra.co.nz)



[info@fiordland.gen.nz](mailto:info@fiordland.gen.nz)

**Application code:** HRE05002  
**Applicant:** Animal Health Board  
**Application category:** Import and manufacture hazardous substance.

Dear Sir/Madam,

66 s, wish to support the use of 1080 in the control of possums, wallabies and rabbits, and for the targeted by-kill of rodents and mustelids, (mainly stoats).

Our reasons for this are,

- We see the use of 1080 as the most effective tool and only way to eradicate these pests and save the decline of the forest. As owner operators of 65ft charter vessel based in Doubtful Sound, we see the damage these pests are causing everyday. Our broadleaf, pseudopanax, hen and chicken fern etc are not regenerating and the forest is becoming very quickly modified.
- If you want to witness and understand this damage, and modification taking place in our forests, we can offer you, free of charge, the chance to do so in Fiordland National Park. To make a really informed decision on 1080 this information is essential.

We hope you will take our offer seriously, as it is extremely important for the health of all native forests, and consequently tourism.

We would like to be heard at any hearings in connection with this submission.

Yours sincerely,



9134

RECEIVED  
31 JAN 2007

**A SUBMISSION TO THE ENVIRONMENTAL RISK MANAGEMENT  
AUTHORITY ON THE REASSESSMENT OF COMPOUND 1080  
HRE 05002**

**To:**

THE ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
PO BOX 131  
WELLINGTON 6140

Email: info@ermanz.govt.nz

**Submitter:**

NGATI KAHUNGUNU IWI INCORPORATED

**Address for Service:**

NGATI KAHUNGUNU IWI INCORPORATED  
P O BOX 2406  
HASTINGS

Phone: (06) 876-2718  
Fax: (06) 876-4807  
Email: paatai@kahungunu.iwi.nz

**A Te Ao Marama: -**

1. The basis for tangata whenua relationships with the environment evolves from whakapapa, wairuatanga and kaitiakitanga. If these concepts are given due consideration within decision-making processes, then for Maori, the right decisions should naturally follow. We see ourselves as part of the natural world, not separate. Decisions made which affect our environment, affect us.

2. It is acknowledged that possums, mustelids and rodents pose significant threats to the environment and to the economy; however it is the majority view of tangata whenua within our rohe, that where these mammalian pests are resident on Maori-owned land, then the landowners, in this case Maori, should have a major say in the control methods to be used. The use of 1080 on Maori owned land should involve Maori.

3. There is a perception and preference within government management structures for a one size fits all approach when dealing with Maori organisations, when there are clear differences between separate iwi and in some cases between hapu groups within iwi. Tino rangatiratanga resides with the hapu, and the mana over Maori owned land, which incorporates major decision-making rights in relation to land management; extends from mana wairua and mana tupuna to mana tangata. As tangata whenua our values and relationships with our environment cover a wide scope of issues including respect for all living things, for taonga tuku iho and taonga tuku koirora. As kaitiaki, we have a duty in this instance, to ensure that best practice around the use of 1080 includes appropriate respect for our interactions with the separate components of the natural world.

4. The purpose of the Hazardous Substances and New Organisms Act is "to protect the environment, and the health and safety of people and communities, by preventing or managing the adverse effects of hazardous substances and new organisms." In our view there is scope within this kaupapa for more protection of non-target species of value to Ngati Kahungunu iwi and hapu. This could be accomplished by engagement of hapu by contractors employed by vector agencies, to carry out Cultural Impact Assessments within hapu specific areas. It would be difficult for contractors to gain a true appreciation of hapu values and concerns, and devise means to mitigate adverse effects on them, without some form of dialogue taking place. Protection and prevention of the environment is paramount for kaitiaki as they are part of that environment.

#### **B Reasons for Submission: -**

1. Ngati Kahungunu Iwi Incorporated advocates for the major interests of the tangata whenua throughout the southeastern portion of the North Island.

2. The basis for addressing matters arising between local or national government and the tangata whenua within our rohe, is through the Treaty of Waitangi and its principles. The Department of Conservation (DoC), one of the major promoters of 1080 is required under the Conservation Act 1987, to give effect to the principles of the Treaty of Waitangi, and regional councils within our rohe, who are the vector control agencies, have recognised the general principles when addressing issues with capacity to affect the hapu of Ngati Kahungunu. Some principles are included in regional and district plans, in recognition that tangata whenua are not just another sector of the community, but a group with special status including tino rangatiratanga, mana, and kaitiaki responsibilities for the environment, in addition to being a Treaty partner.

3. In relation to the re-assessment of 1080, it is necessary to enquire into the nature and extent of the range of issues surrounding firstly the re-assessment

process, and then the affects of the use of 1080 on tangata whenua; as individuals, as hapu, as whanau and as iwi. Some of our whanau voiced their concerns surrounding the 1080 issue at the DoC / AHB consultation hui. There has been some opposition to its continued use due to past application practices and the actual and potential damage to our taonga.

4. The use of the toxin 1080 has the capacity to adversely affect Maori more than most other sectors of the regional community due to our close connections with the natural environment. Our uses for natural resources form an integral part our culture. The rivers and streams, the lakes, the forests, the land, all have a wide variety of uses and values. They are our taonga. Their values are sometimes hapu or site specific. Where the use of 1080 detracts from these, we see a need for preventive or mitigation measures to be included within the management regime and controls surrounding the use of 1080 within our rohe.

5. Manawhenua and manamoana is authority over what happens with our natural resources. In our view, mana is not a commodity to be put within the legislative framework and traded or balanced against other considerations. It is absolute. There is a strong emphasis put on economic considerations within the 1080 application particularly around the cost effectiveness of aerial applications. The pervading view within Ngati Kahungunu is for increased use of ground control methods for easier country, enabling our people to interact with DoC and the AHB in the management of our forests.

6. Death or illnesses to non-target species of fauna, and adverse effects on other taonga are elements that need more prescriptive controls than have been evident in the past. Effects of aerial applications of 1080 on non-target species are to a large extent indiscriminate. Lethal effects on dogs, cats and native birds have been well documented. We see a requirement for increased controls. For our hapu, these could be determined after consultation with the hapu concerned, as it is they who hold kaitiaki status and responsibility within each of their respective rohe.

7. We acknowledge some of the extra research that has been carried out looking into the uptake of 1080 by plants, eels, and the effects on birds. Results show that 1080 breaks down and after a number of weeks is no longer detectable in plants or in eel flesh. We question however the need to contaminate any aquatic life with a vertebrate poison targeted at land-based species, simply because aerial applications are the "most economic." Further research is required to analyse sub-lethal effects of 1080 on our taonga species.

8. The use of indigenous plants for rongoaa (medicinal) reasons is a practice handed down from our tupuna. These plants are often sourced from the remaining indigenous forests. Their efficacy, healing power and survival after 1080 aerial applications have not been well researched.

9. Where all adverse effects of an activity are unknown, then an element of precaution is necessary until all adverse effects have been quantified. The toxin 1080 remains viable within possum carcasses for long periods. The secondary effects of 1080 toxin on predators, insects, bacteria and fungi have yet to be accurately determined. Sub-lethal effects on predatory birds and insects are likely given the amount of time taken for carcasses to break down, particularly over the winter months.

10. From the 1080 application document, it is apparent that the promoters seek an increase in the circumstances where 1080 may be used, e.g. for the control of rabbits and other mammals. This would mean increased risks for domestic animals and predators given the time lapse between consumption of 1080 and lethal effects.

### **C Consultation: -**

1. In our view the consultation process carried out by the Animal Health Board and the Department of Conservation was deficient in that the process was more in the realm of an information release than true and effective consultation. While having the opportunity to carry out a robust consultation process, we feel the methodology was flawed. We hope that this "model" will not be used again within the ERMA process unless it undergoes substantive amendment.

2. Some of the problems that need highlighting with the 1080 consultation process are: -

- The lack of minutes from all of the hui leading to inconsistent reporting and therefore inaccurate analysis of results
- The inability of the DoC and AHB speakers to answer some of the technical questions, which left the people who asked the questions with the task of having to try and source relevant information from elsewhere
- The obvious bias with the presentations as both the DoC and the AHB are supporters of the concept, i.e., there was a lack of another view and / or other technical expertise
- Lack of a sound methodology for all of the hui resulting in inconsistencies between hui
- The analysis of the hui being done by some-one who never actually attended them
- The use of written reports only in relation to the hui analysis, thereby omitting relevant information, the expertise or otherwise of hui participants, the numbers of people whom they represented et cetera.

## **D Discussion: -**

1. The Treaty principle of active protection of our interests can only be achieved if the Crown and its agencies know what those interests are, which means that whoever is acting under delegated authority within the 1080 kaupapa needs to talk to the hapu involved so that they can define ways to protect those interests. Our hapu have don't want someone from another rohe making decisions about their whenua, their awa. Kaitiakitanga implies a major role in land management decisions using tika and tikanga from within the hapu.
2. There needs to be a decentralising of management around the control and use of 1080. The authority can set the framework and protocols for 1080 around which vector agencies can work, but the operational side needs an increased level of engagement with Maori. We see a need for closer ties with DoC, the AHB and councils, so that we can work together to achieve common goals.
3. There is a perception amongst some of our whanau that the poisoning of our land with 1080 is to a large extent for the profit of others. Possums were brought to Aotearoa to create a fur industry for financial gain and now it is costing millions of dollars to get rid of them with the major beneficiaries being the farming community. (Through exports and market access) In the early days of colonisation much our forests were destroyed for pastoral farming. There is a necessity to ensure that further treaty grievances are not incurred due to the 1080 issue.
4. Waste to resource options could be factored into the control of possums if we were to look at the broad picture. The application document stresses the financial benefits to be derived from 1080 use when the truth is that the public purse would be subsidising financial gains for a small sector of the community. It is acknowledged that in the more rugged country that aerial application is the most feasible means to achieving control of possums, but in the more accessible areas other options should be explored, particularly if there is the chance for cost recovery, and where they are more in line with hapu / whanau preferences.
5. Our hapu have voiced the desire to retain some level of input over the use of 1080 at the local level, in line with manawhenua. This would not be a veto but input into how it is used locally, what times of year, other tools which are complementary to 1080 and less damaging, and ground based applications where feasible.


## **E Decisions sought: -**

1. That the use of 1080 within regions be categorised in a similar fashion to restricted discretionary activities with the following matters for control / discretion:
  - A 50 metre buffer zone around lakes, dams, rivers and streams for aerial applications of 1080
  - Aerial application of 1080 to be restricted to a 3-month period each year, this period to be defined after consultation with iwi / hapu authorities
  - Monitoring of native fauna both prior to and after 1080 operations
  - Assessment of likely effects on tangata whenua relationships with the environment where 1080 is to be used
  - The selection of best practice mechanisms which maximise the protection of or prevent damage to non-target species
  - Removal and safe disposal of carcasses where feasible
  - A requirement for vector control agencies and contractors who manage and administer 1080, to interact with iwi and hapu, and for Cultural Impact Assessments to aid in determining best practice to minimise adverse effects on tangata whenua and their values
  - Taking into account the principles of the Treaty of Waitangi and the spiritual values of tangata whenua in local decision-making processes
2. A maximum period of 10-years for the approval of 1080, thus allowing for research into development of less toxic control methods and any advances in vertebrate control technology.
3. Tangata whenua engagement in the conception, design and modelling of 1080 applications on Maori owned or managed land, the Conservation Estate, in major river catchments and where rongooa plants are harvested.
4. Better articulation of the AHB and DoC long-term strategy for control of possums, mustelids and other (pest) vertebrates.
5. The establishment of exposure limits for 1080 to prevent adverse effects of 1080 on the health and safety of people who use indigenous and naturalised fauna and flora for food, medicine, shelter or recreational purposes.
6. Interaction between Maori, government agencies, Councils as vector control agencies, the AHB and DoC, and 1080 contractors.
7. We ask for a hearing to be held on a marae, as that is the appropriate venue for major decisions affecting Maori to be made.
8. Continued research into alternative control methods for mammalian pests that would have less adverse effects on non-target species.

**F We wish to be heard in support of our submission at any hearing convened for the consideration of the reassessment of 1080.**

Noho ora mai,

**Signed: -**

  
\_\_\_\_\_

**Date:** 30/1/2007

**Date:** 30/01/007

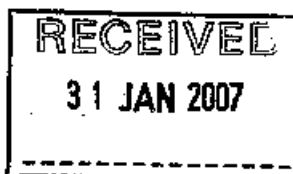
Ngati Kahungunu Iwi Incorporated

Resource Management Advisor

9135



greater WELLINGTON  
REGIONAL COUNCIL



File No: WB/01/13/01  
29 January 2007

PO Box 41  
34 Chapel Street  
Masterton  
New Zealand  
T 06 378 2484  
F 06 378 7994  
W [www.gw.govt.nz](http://www.gw.govt.nz)

Environmental Risk Management Agency  
P O Box 131  
Wellington 6140

Greater Wellington is the promotional  
name of the Wellington Regional Council

Dear Sir / Madam

**1080 Reassessment Application - Greater Wellington Submission**

Please find attached Greater Wellington's submission on Application HRE05002 by the Animal Health Board and the Department of Conservation on the reassessment of Sodium Fluoroacetate (1080) and substances containing 1080.

Yours faithfully

Enc.

WGN\_DOCS-4399440-V1

Water, air, earth and energy elements in Greater Wellington's logo that combine to create and sustain life. Greater Wellington prioritises Quality for Life by ensuring our environment is protected while meeting the economic, cultural and social needs of the community.

## Information for ERMA:

**Name of Organisation making the Submission:** Greater Wellington Regional Council

**Contact:**

1,

**Contact Address:**

**Phone:**

**Fax:**

**Email:**

## Application Details:

**Application Code:** HRE05002

**Applicant:** Animal Health Board, Department of Conservation

**Application:** The reassessment of sodium monofluoroacetate (1080) and substances containing 1080 (a vertebrate toxin). The applicants wish to continue to use 1080 for the control of possums, wallabies, and rabbits, and for the targeted by-kill of rodents and mustelids (mainly stoats).

## Reason for Submission:

Greater Wellington has both statutory and contractual obligations for the management of pests within the Wellington Region.

These obligations include the maintenance of regional indigenous biodiversity, the implementation of the Regional Pest Management Strategy 2002-2022; and our contractual responsibilities as Vector Manager in the Wellington region for the Animal Health Board's National Pest Management Strategy for Bovine Tuberculosis.

In these roles, Greater Wellington uses and is an advocate for the use of 1080 by contractors. The focus of our 1080 usage is predominantly possum control, but is also used for rabbit control and for the by-kill of rodents and mustelids.

Greater Wellington, and its contractors, rely significantly on the use of 1080 for pest control in areas of difficult terrain; where access for ground control is impeded; and in new management areas

where pest densities need to be rapidly controlled to low levels. In these situations, alternative toxins are not as cost effective and can have more potential negative environmental impacts.

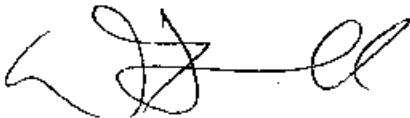
Greater Wellington does not believe there are viable alternatives to 1080, particularly for areas that currently receive aerial application. Greater Wellington is also concerned that when the effectiveness of the rabbit calicivirus reduces, landowners and statutory agencies will require access to toxins to manage the inevitable explosion in rabbit numbers. 1080 remains the most effective tool available for the control of high rabbit numbers.

**Decision sought by Greater Wellington:**

Greater Wellington strongly supports the application by the Animal Health Board and the Department of Conservation, and seeks a decision by ERMA that allows the continued use of 1080 for the control of possums, rabbits and wallabies, and the positive by-kill of mustelids and rodents.

Greater Wellington believes, however, that there is a strong need to revive the previous control requirement for licensing purchasers of 1080 products i.e. separate to users.

**Greater Wellington wishes to be heard in support of its submission.**

A handwritten signature in black ink, appearing to be 'L. J. [unclear]'. The signature is written in a cursive style with a large initial 'L' and a long horizontal stroke.

Dated: 29/1/07

## **Additional Comments on Application HRE05002**

### **Introduction**

The initiative shown by the Department of Conservation and the Animal Health Board in presenting this reassessment application is to be commended. Over the past 10 years, in particular, the substance 1080 has attracted considerable negative comment from a number of organisations and individuals. This negativity has received a great deal of attention from the media, and has only served to fuel the level of public opposition. Unfortunately, most of this opposition has arisen from positions of ignorance. The general public know very little about the significant body of research completed and available on the substance 1080. Nor are they aware of the extreme risks to New Zealand's biodiversity and beef, deer and dairy industries, if 1080 were to be unavailable for future pest control in this country.

In general, there is considerable apathy amongst New Zealanders when it comes to researching the risks and benefits of 1080 usage. The Department of Conservation (DoC), Animal Health Board (AHB) and Regional Councils have consistently produced material about 1080, including new research findings. Despite these efforts, there continue to be widespread misconceptions about the risks and benefits.

This reassessment process will provide a timely opportunity to objectively assess the substance 1080 and, hopefully, put into context for the public the risks and benefits of its use across the New Zealand environment.

### **The Wellington Region – Key Points**

Greater Wellington has statutory responsibilities that incorporate pest control in two key areas –

- Under the Resource Management Act 1991 the council is responsible for establishing, implementing and reviewing objectives, policies and methods for the maintenance of indigenous biological diversity; and
- Under the Biosecurity Act 1993, via the implementation of the Regional Pest Management Strategy 2002-2022.

Greater Wellington also has a contractual responsibility to the AHB as their regional Vector Manager for the National Pest Management Strategy for Bovine Tb.

The area under sustained management control for Bovine Tb purposes is over 600,000 hectares. Greater Wellington is also responsible for the management of over 45,000 hectares of its own regional parks, production forestry and water catchment areas. These areas are all included in pest control programmes incorporating the use of the substance 1080. Collectively, over 78% of the Wellington region receives pest animal control, inclusive of the efforts on the DoC estate.

The substance 1080 has played a major role in ensuring firstly, that the regions pest control programme could regularly expand and, secondly that this area could continue to receive sustained pest animal control.

The substance 1080 has played a major role in reducing the level of Bovine Tb infection in the regions deer, dairy and beef herds. From July 1995 to July 2006, infected herds in the Wellington region fell from 331 to just 15. In the mid to late 1990's, 1080 was a critical tool to reduce high possum densities in a short timeframe, following a rapid expansion of the Bovine Tb control programme.

Since the mid 1990's there has been a considerable rise in public interest in ecosystem protection and enhancement. There has been a rise in private land protection programmes and, more recently, the establishment of large numbers of community 'care' groups. This has been a New Zealand wide phenomenon. In the Wellington region, the substance 1080 has played a key role in providing an initial 'knock down' of predators (possums, mustelids, rodents) prior to management by the groups.

### **The Benefits of the Substance 1080**

Greater Wellington believes that 1080 offers considerable advantages over any other currently available Vertebrate Toxic Agent (VTA), including –

- A greater understanding of the risks, costs and benefits following considerable peer reviewed scientific research;
- Provision of multiple species control options;
- Proven large scale, cost-effective control over short timeframes;
- An aerial application option;
- A wide choice of bait applications ( cereal pellets, carrots, paste, apple, oats and gel)

With recent advancements in technology and monitoring, application rates of 1080 by air have reduced significantly. In the early 1990's it was common for applications to be 10kg per hectare, reducing to 5 kg per hectare in the mid 1990's. From the late 1990's applications have reduced to as low as 1 kg per hectare. This, together with the advent of navigational guidance systems, has resulted in less VTA in the environment and enhanced accuracy in application. The flow on effect is reduced potential for impacts on non-target species and reduced risk for contamination of water supplies.

Application HRE05002 provides considerable evidence of the costs and benefits of 1080 usage. Of significance are the major potential negatives for New Zealand should 1080 be withdrawn. In particular, there would be a major reduction in area controlled under the National Bovine Tb Strategy. Secondly, there would be a large increase in costs as alternative VTAs are not as effective. Finally, there would be the unacceptable reduction in pest control programmes on the DoC

estate and on other public and private lands. DoC are recognised internationally for their excellent work in managing iconic native species at risk of extinction. A large number of DoCs successes can be attributable to the multiple benefits that accrue from the use of 1080. It is clear that without 1080, the future of many of our rare and endangered species will be put at risk.

## **Risks Associated with the Substance 1080**

There is widespread understanding within the pest management industry that the use of VTAs brings certain risks. In the case of 1080, the most serious risk is to domestic pets, particularly dogs. The lack of a quick acting antidote is of considerable concern.

The risks to humans are not high, particularly when compared to those associated with the use of cyanide. The latter has become the VTA of choice by many contractors in the industry. Usage has increased markedly in the last 10 years, particularly following the development of the encapsulation process. Despite the number of human deaths, the public attitude to cyanide use is almost blasé, with many considering it a more acceptable VTA to 1080. This attitude is more a reaction to the perception that cyanide poses less risk to both domestic and farmed animals.

With regards to potential water contamination, Greater Wellington has been an active participant in testing water supply catchments following aerial applications of 1080. Between 1993 and 2006, 141 water samples from public water supply catchments within the Wellington region were tested for 1080 residuals. These included the main supplies for Wellington and Hutt Cities, Masterton, Carterton, Greytown, Featherston, Otaki and the coastal Castlepoint community. A further 30 tests have been completed for private water supplies. Testing duration ranged from 2 to 120 days with no trace of 1080 ever being detected in any of the tests.

Air contamination potential has also considered. Greater Wellington participated in an air monitoring trial near the Featherston township in 1996. NIWA completed air sampling at three sites, two within an aerial 1080 application area and the third on the perimeter. All samples collected were clear of 1080 residual.

The greatest risk of human 1080 contamination is to those involved in the manufacturing and distribution of bait. Greater Wellington staff have actively participated in 1080 residual testing during ground and aerial applications. During the period 1999 to 2006, 41 urine and 32 blood samples were collected from staff and contractors. No 1080 was detected in the blood samples and none of the urine samples exceeded the BEI of 15ug/litre.

Greater Wellington considers that the risks associated with 1080 are more than adequately regulated and controlled through the various statutes that govern current use, including HSNO, ACVM and the RMA. Medical Officers of Health are also closely involved in the governing process. Open public consultation, communication and dissemination of accurate information are the key issues that must be emphasized to reduce risk.

Greater Wellington believes that the current purchasing requirements need to be tightened. Previously, purchasers of 1080 needed to be specifically licensed. Approved purchasers included

Regional Councils, DoC and some of the larger contracting companies. This gave control over who had direct access to the VTA. However, this requirement has been relaxed, resulting in anyone with a CSL being able to acquire 1080. Greater Wellington believes that this change has increased the risk of 1080 being used incorrectly or worse, accessed by certain people to use for illegal activities.

## **Future Potential Uses**

The introduction of the rabbit calicivirus (RCV) in 1997 has had a major impact in control requirements throughout New Zealand. However, recent monitoring results indicate that rabbit populations are again increasing as immunity levels increase. The future may well see widespread increases in rabbit numbers, with the Council having to enforce landowner compliance with the Regional Pest Management Strategy rules. To date, the only effective response for large scale control programmes has been via the aerial application of 1080.

Should 1080 not be available then rabbit impacts on pastoral land throughout New Zealand will be significant. Not only will rabbits compete directly with livestock, there will be severe soil erosion risks, and modification of plant communities. Ecosystem impacts will be severe over time. Research has also shown that high rabbit numbers will help maintain predator populations, particularly mustelids and feral cats. These predators will also have negative impacts on our indigenous fauna.

Despite decades of research, advancements in new VTAs have been very slow. Recent advancements have been predominantly 'adding value' to existing VTAs. Pest managers are constantly struggling with problems linked to a depleted 'tool kit'. Public criticism and scepticism of some of the current anticoagulant VTAs appears to be increasing, much of it due to misinformation and misinterpretation. Under these circumstances, the loss of 1080 would have catastrophic circumstances for the pest management industry in New Zealand.

## **Conclusion**

Greater Wellington reaffirms its strong support for the continued use of 1080 in New Zealand. The current regulatory controls for 1080 are adequate, with the exception of the licensing requirement for purchasers. Co-ordination of management controls by ERMA and ACVM need reviewing to ensure there is no duplication.

Greater Wellington supports the existing involvement of the Medical Officer of Health to manage public risk for proposed applications of 1080.

Greater Wellington believes that the applicants have provided comprehensive evidence to support the continued use of 1080, in a range of formulations. The scientific evidence available clearly rebuffs the anecdotal and emotionally charged arguments proffered by many 1080 opponents. Greater Wellington recognises, however, that the use of 1080 does have an impact on people's lives, even if the concerns are a result of perceived risks. The challenge for ERMA is determine a

resolution which maximises the potential benefits to New Zealand economy and environment whilst minimising risks, perceived or real, to the general public.

Nelson 7010

Contact: .

ERMA New Zealand,  
P.O. Box 131  
Wellington.



22<sup>nd</sup> January, 2007

**Submission in support of the continued approvals which allow the use of 1080 for pest control - HRE05002**

We wish to support the application by the Animal Health Board and the Department of Conservation in their application to be able to continue using 1080 especially in aerial drops. It is the most effective agent we have in the eradication of possums. Any other poison, for example, cyanide, is far more toxic and is known to kill kiwi. Hunting, trapping and bait stations are not practical methods in the rugged terrain of New Zealand such as, in our area, the Kahurangi National Park.

The Forest and Bird Protection Society aims to restore our forests to their former glory, and to encourage birds to inhabit them as they once did before the introduction of possums, mustelids, rats and feral cats. Their populations were decimated by predation by these introduced mammals and the competition for food.

We have seen the success of intensive pest control in the Abel Tasman Mainland Island as mistletoe and fuchsia now flower and bird populations are growing. The robins are a delight. This is not the result of 1080 but demonstrates what we could expect by the use of 1080 aerial drops in places which cannot be accessed without great difficulty.

We hear objections to 1080 by people claiming that it is responsible for killing birds. The Department of Conservation's monitoring in the Pureora Forest and the Waipapa Ecological Area, proves that this is not so.

Another objection is thought to be an adverse effect on waterways. This is also a myth in that soil micro-organisms and rain breaks 1080 down rapidly into salt and vinegar.

1080 is a humane way to kill mammalian pests as it causes herbivores to die quietly from heart failure. Dogs can also be poisoned by eating carcasses of poisoned animals but we think that it would benefit the forests if all people taking their dogs into the forests were advised to put on muzzles which would stop them nosing out vulnerable kiwi. As for feral deer what a good thing because they are a major conservation pests, they eat out the under-story of forests preventing regrowth.

Until an equally effective pest control method is found we request that the continued use of 1080, especially aerial drops continue to ensure the survival of our precious flora and fauna.

We wish to be heard.

*[Handwritten signature]*

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
NGĀ KAIWHAKATŪPATO WHAKARARU TALAO



9137

### Submission Form

Please feel free to write on or photocopy this form.  
We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission \_\_\_\_\_  
 Contact person \_\_\_\_\_  
 Contact address \_\_\_\_\_  
 Phone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

This submission is about -  
 Application number: HRE 05008/03  
ANIMAL HEALTH BOARD  
 Application by JOINT BY DEPARTMENT OF CONSERVATION (applicant name)  
 to USE 1080 POISON FOR ANIMAL CONTROL (application purpose)

Reason for submission (attach supporting information) I OPPOSE  
THE USE OF THIS PRODUCT FOR SEVERAL  
REASONS.  
THIS INFORMATION WILL FOLLOW WITHIN 10 DAYS.  
THE REASON FOR THIS DELAY IS BECAUSE OF  
THE TWO WEEK BETWEEN MY REQUEST FOR THE  
PACKAGE AND ITS ARRIVAL AT OUR POST CENTER  
ON 25-1-07 AFTER A SECOND REQUEST.  
 What decision do you seek (optional) \_\_\_\_\_  
A COPY OF THIS SUBMISSION WILL BE DELIVERED TO MY LOCAL  
 Do you wish to be heard in support of your submission?<sup>1</sup>  Yes  No MP  
 (at a public hearing)

Signature [Signature] Date 30-1-2007

Post to: ERMA New Zealand P O Box 131, Wellington Fax to: ERMA New Zealand (04) 473-8433

<sup>1</sup> Please note that if any submitter indicates they wish to be heard, the Authority is obliged to hold a public hearing.

(2)

THE ABOVE SUBMISSION FORM IS A REPEAT OF THE ORIGINAL FAXED TO YOU ON 30-1-2007. AND NOW CONTAINS MY REASONS FOR OPPOSING THE USE OF 1080 AND MY CONCERNS AT THE CORRECTNESS OF THE INFORMATION PROVIDED IN THE DOCUMENTS ~~USE OF~~ (THE USE OF 1080 FOR PEST CONTROL) A JULY 2004 DOC-AHB PUBLICATION AND (APPLICATION FOR THE REASSESSMENT OF 1080) AGAIN A PUBLICATION BY DOC-AHB, DATED 16TH OCTOBER 2006.

I WOULD SUGGEST TO YOU THAT THE APPLICANTS DID NOT WANT THE PUBLIC OF NEW ZEALAND TO BE INVOLVED OR HAVE KNOWLEDGE OF THIS PROCESS. THE VERY FACT THAT ONLY 90 DISCUSSION DOCUMENTS, WERE CIRCULATED AND THIS PRODUCED 537 TOTAL SUBMISSIONS, ONLY 360 FROM THE PUBLIC WOULD CONVEY TO ME PUBLIC CONSULTATION IN THE ~~WIDER~~ TRUE SENCE HAS NOT BEEN ACHIEVED.

OTHER ASPECTS I FELT PUT THE PROCESS AT RISK. THE SUBMITTERS WERE REQUIRED TO COMMUNICATE DIRECTLY WITH THE APPLICANTS. AND THEY IN TURN WOULD PASS THE INFORMATION ON TO THEIR CHOSEN SERVICE PROVIDER URS NEW ZEALAND LTD. FOR ANALYSIS. MY VIEW OF THE ABOVE AND THE FACT IT CONTAINS FACTUAL ERRORS GIVES ME NO CONFIDENCE IN ~~THE~~ ~~SEGMENT~~ APPENDIX D OF THE OCTOBER 2006 DOCUMENT. ERMA SHOULD DISREGARD THE INFORMATION CONTAINED IN THIS SEGMENT OF THE APPLICATION PACKAGE, AND CONDUCT THEIR OWN RESEARCH.

I AM CONCERNED TO LEARN FROM YOUR 0800 PERSON THAT IF THE SUBMISSION FORM PROVIDED DOES NOT HAVE A TICK BOX ACTIONED THE SUBMISSION IS CONSIDERED INVALID, THIS INFORMATION IS NOT PRINTED ON THE FORM, ANY SUBMISSION REJECTED FOR THIS REASON SHOULD BE ~~CONSIDERED~~ RECONSIDERED.

(3)

THE OCTOBER 2006 DOCUMENT IS DEFICIENT IN INFORMATION REGARDING EFFECTS ON ANIMALS AFTER INGESTING 1080 POISON THIS MUST SURLEY BE A CONSIDERATION BY THE AUTHORITY, I HAVE BEEN INFORMED THAT POSSUMS CAN TAKE UP TO FOUR DAYS TO EXPIRE, THIS FROM A FORESTRY CONTRACTOR WORKING IN A TREATED AREA (MOHAKA STATE FOREST) ANOTHER PERSON I HAVE MEET DESCRIBED THE DEATH OF A SIKA DEER HE WITNESSED AFTER AN OPERATION (KAWKA STATE FOREST) THIS ANIMAL EXIBITED EXTREM PAIN OVER A THREE HOUR PERIOD BEFORE IT LAFED INTO UNCONCIOUSNESS AND DIED. I REQUESTED MORE INFORMATION ON THIS TOPIC FROM LAND CARE RESERCH (LINKOR) ~~AND~~ HOWEVER BECAUSE FUNDING FOR THAT PROGRAM CAME FROM THE AHS THEY INFORMED ME IT COULD NOT BE MADE PUBLIC, THIS IS AN OVRAGE, THE AUTHORITY MUST EXAMINE ALL INFORMATION NOT JUST WHAT IS PROVIDED IN THE APPLICATION PACKAGE.

MISINFORMATION IS USED IN THIS DOCUMENT TO CONVEY TO YOU ONLY ONE OUTCOME IS ~~BEING~~ SUITABLE FOR THERE APPLICATION. THE APPLICANTS HAVE NOT PRESENTED ANY EVIDANCE THAT TB IS WIDE SPREAD IN WILD ANIMALS AND IS SPREADING TO INFECT NEW AREAS I REFER YOU TO THE EPRO LTD OPERATION COVERING 55,000 Ha. IN THE UREWERA AREA THIS OPERATION WAS TRIGGERED BY THE FINDING OF TB IN 2 DEER (PERAL) ~~PERAL~~ AND A FINDING OF FURTHER INFECTIONS IN PIGS RELEASED INTO THE AREA. BY LAND CARE RESERCH. (MANY OF THESE ANIMALS DIED OF STARVATION OR HYPOTHERMIA) THE PIGS IN THIS ~~TRIAL~~ <sup>TRIAL</sup> MAY HAVE <sup>HAVE</sup> THE INFECTION BEFORE BEING RELEASED, A SKIN TEST WAS COMMISSIONED PRIOR THEIR RELEASE BUT THIS IS NOT A TRUE TEST ONLY AN INDICATOR.

(4)

I ~~BE~~ FIND IT INCREDIBLE THAT THE TARGET ANIMAL SPECIES WAS NOT SURVEYED FOR THE DISEASE PRIOR TO THIS OPERATION COMMENCING, SURLY THIS BASIC TEST RESULT WOULD BETTER INFORM ON THE MATTER ON HOW TO CONTROL THE INFECTION. I WOULD SUGEST THE ABOVE OPERATION WAS LITTLE MORE THAN JOBS FOR THE BOYS FUNDED BY LIVESTOCK FARMERS IN NEW ZEALAND.

I TRAVELED OVER SH38 DURING THE ABOVE OPERATION AND WOULD INFORM YOU THAT NO WARNING NOTICES WERE ERECTED ON THE ROAD RESERVE, TO INFORM THE PUBLIC OF A POTENTIAL DANGER IF LEAVING THEIR VEHICLE.

THE APPLICANTS LACK ~~THE~~ KNOWLEDGE ON THE REAL WORLD OF THE BUSH, SURVEYS ON POSSUMS A WOULD REVEAL THAT THE ROGERD AND HIGH POPULATIONS LAND HAS LITTLE FOOD AND ANIMAL DENSITIES ARE LOW, THESE ANIMALS PREFER LOWLAND SCRUB WITH GRASS ADJACENT. MY OBSERVATION IS INTERIOR FORESTS. WET AND MOSSY ARE NOT A PLACE WHERE POISON SHOULD BE APPLIED MONEY IS JUST BEING WASTED.

THEIR BIAS TO USING 1080 OVER OTHER FORMS OF CONTROL HAS A HIGH RISK OF GIVING A NEGATIVE VISION OF NEW ZEALAND. IN TRADE AND TOURISM INDUSTRY, EFFORTS ARE AT THIS TIME ~~BEING~~ BEING MADE TO FILM THE EFFECTS OF 1080 ON ANIMAL SUFFERING AND LINGERING DEATHS. ~~THESE~~ THESE PEOPLE <sup>WOULD</sup> COMPILE TO A FILM AND POST IT ON A WEB-SITE THE RESULT ~~WOULD~~ BE ADVERSE FOR OUR COUNTRY. CONSIDER THE AUSTRALIAN PRACTICE OF MULESING MARINO SHEEP. THIS CAUSED OUTRAGE IN EUROPE AND OTHER MARKETS, CUSTOMERS DIDNT WANT A BAR OF THIS WOOL CAUSING A BIG DECLINE IN DEMAND FOR THIS PRODUCT.

(5)

I REQUEST THAT SHOULD A POISON BE REQUIRED FOR THESE CONTROL OPERATIONS CYANIDE ~~SHOULD~~ BE POISON USED THIS IS FAR FASTER THAN 1080 THE AND MORE HUMANE POSSUMS ARE UNCONCIOUS IN A FEW SECONDS AND DEAD A LITTLE OVER TWO MINUTES LATER. THIS IS WHY IT IS THE POISON OF CHOICE BY FUR & SKIN RECOVERY. OPERATORS ANIMALS ARE OFTEN FOUND LESS THAN ONE METRE FROM THE BAIT. THE APPLICANTS IMPLY CYANIDE TAKES UP TO 12 MINUTES TO KILL, THIS IS NOT THE CASE IF IT WAS IT WOULD BE USELESS USED IN A COMMERCIAL OPERATION.

ERMA SHOULD HAVE NO CONFIDANCE IN INFORMATION EMANATING FROM THE A.H.B. THIS BODY DID NOT DISCLOSE TO THE PUBLIC ITS INTENTIONS REGARDING ARIAL DROPS OF 1080 IN THE HAWKS BAY AND GISBORNE RANGES, THEY IMPLIED THAT THE 56,000 Ha WAIROU OPERATION WOULD GREAT A BUFFER ZONE TO PREVENT INFECTION SPREADING NORTHWARD THIS IS HOW IT WAS SOLD TO THE PUBLIC, THE OCTOBER DOCUMENT SHOWS ITS INTENTION IS TO CONTINUE TO USE THIS TYPE OF OPERATION IN THE RANGES NORTH OF THE LAST DROP AREA. A RECENT TB INFECTION FOUND IN WAIROA AREA WAS CLAIMED BY A.H.B. TO HAVE BEEN CAUSED BY INFECTED POSSUMS. THIS IS NOT THE CASE. A FARMER CAUSED THE PROBLEM BY MOVING INFECTED STOCK INTO THE ~~DISTRICT~~ DISTRICT PUTTING THE OTHER FARMERS AT RISK, SUGGEST YOU CONFIRM THIS INFORMATION WITH THE WAIROA BRANCH OF FEDERATED FARMERS.

ERMA MUST BE AWARE THAT THE DECISION SORT BY THE APPLICANTS MUST BE ACCEPTABLE TO THE NZ PUBLIC, ~~SUGGEST A INDEPENDENT PANEL BE GIVEN THE TASK OF GATHERING THIS INFORMATION & SEND THIS FOR THE FOLLOWING REASONS.~~

~~THE DIOXIN ~~IS~~ PROBLEM IN PARATUTU NEW ZEALAND~~

(6)

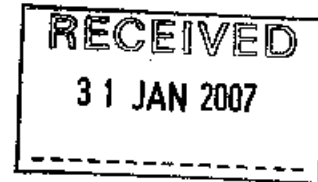
ON MY PART THIS IS WHAT I SEEK AS AN OUTCOME ~~OF~~ FROM YOUR DETERMINATION

- (A) ARIAL APPLICATION OF 1080 BE PHASED OUT BY 2010.
- (B) GROUND USE OF THE ABOVE TO CEASE BY 2015.
- (C) GREATER USE OF OTHER CONTROL SYSTEMS TO BE INTRODUCED (E.G. FUR-HEAT RECOVERY)
- (D) THE IMMEDIATE INTRODUCTION OF ~~THESE~~ SPECIFICATIONS TO BE MET BEFORE THE USE OF 1080 ON PUBLIC LAND IS CONSIDERED.
- (E) PUBLIC NOTIFICATION AND AGREEMENT PRIOR TO 1080 USE ON PUBLIC LAND.
- (F) ERMA'S APPLICATION SUMMARY NAMES THE TARGET AND TARGETED BY KILL ANIMAL'S METHODS USED MUST NOT CAUSE HARM TO OTHER SPECIES.
- (G) EXAMIN CLAUSE 2.1.1 AHB IS UNABLE TO MEASURE INFECTIONS IN ~~S~~POSSUMS. IF THIS IS ~~THE~~ FACT WHY IS APPROVAL ~~BEING~~ ~~APPROVED~~ AND FARMER FINANCE BEING USED IN 1080 OPERATIONS.
- (H) AHB OPERATIONS BE RESTRICTED <sup>TO</sup> FORREST MARGINS ADJACENT TO FARMLAND.

PLEASE IGNORE THE SPELLING ERRORS

REGARDS

30-1-2007



7

**SUBMISSION ON THE RE-ASSESSMENT OF 1080**

Reassessment of 1080 poison provides a mechanism to re-examine the risks, costs and benefits of this hazardous substance.

I appose the reassessment of this poison on the grounds of it proliferating one of the very things it is being used to combat, the spread of Bovine Tuberculosis.

Herd movements, Possums as host species, cross contamination of wild and domestic species etc have all contributed to the spread of effected areas, from it first discovery on the West Coast in 1967 to the present day with over 30% of New Zealand land area classified as TB endemic.

However when a large scale possum control operation is complete all the dead possums with Tuberculosis can still pass it on to other species.

In 1979 it was scientifically proven by Livingston "That the length of time M Bovis can be recovered from carcasses of Tuberculosis Possums depends on the speed of putrefaction and decomposition and hence on the ambient temperature and degree of environmental protection given to the carcass".


Preiffer and Morris in 1991 were able to recover M Bovis from the interior of largely dry carcasses at up to at least a month after when the moist interior was swabbed. However in the same study, most tuberculosis infected carcasses left in accessible locations were completely within 2 to 3 days at most.

So the scenario, successful Ariel 1080 possum control operation for Tb over 5 thousand hectares 90% Kill modeled that 10% had Tb. Local ferrets and wild pigs scavenge carcasses with Tb and move out of the control area, a Hawk picks up and moves carcasses to neighbors farm.

Lugton et al 1995 found Tb infected ferrets acquire infection from tuberculosis carrion/prey or by cannibalism. In 2000 they started to release radio transmitted pigs into post control operations to detect the presence of Tb.

Many other factors come in to play with the persistence of Tb in our herds and forests, but when comes to possums we have our blinkers on, loads of Models and assumptions. The reality is 30% of New Zealand's land area is classified as Tb endemic. That figure is still rising each year. Time for a re-think of possum control methodology.

Yours Sincerely

  
\* Indicating I would like to be heard at a hearing.

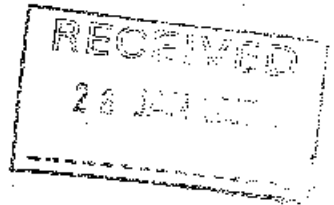
# SOUTHLAND CONSERVATION BOARD

9139

23 January 2007

TE ROOPU ATAWHAI O MURIHIKU

ERMA New Zealand  
PO Box 131  
Wellington



Dear Sir,

**RES02001: ANIMAL HEALTH BOARD APPLICATION TO DECIDE  
WHETHER THERE ARE GROUNDS FOR REASSESSMENT OF 1080 :**

**INTRODUCTION :**

The Southland Conservation Board is a statutory body established in terms of the Conservation Act 1987.

It should be noted that while the board shares a partnership role with the Department of Conservation the board itself is an independent statutory entity. The board is not a decision making body but instead offers advice and makes recommendations to the Department of Conservation on a wide range of conservation issues throughout Southland.

The board also has broad advocacy powers under the Conservation Act 1987 which enables it to advocate its interests in any public forum or in any statutory planning process.

**THE BOARD'S SUBMISSION IS THAT :**

The Southland Conservation Board remains extremely concerned by the overall on-going degradation of the biodiversity values on our public conservation lands. In particular the board identifies possums, rats, cats and mustelids as the main contributors to the decline in these biodiversity values and recent introduction of unwanted organisms in particular Didymo and Undaria.

Feral deer if not controlled will be of concern also if the feral deer industry does not redevelop.

Southland has made some huge gains in some areas with pest control which includes the use of 1080 poison through ground and aerial application. Some of these successes are :

**Catlins Forest :**

1080 poisoning of rats has contained a recent "rat eruption" and ensured the survival of mohua there.

SERVICED BY THE DEPARTMENT OF CONSERVATION

P.O. Box 743, Invercargill 9840  
State Insurance Building, Don Street, Invercargill, New Zealand  
Telephone (03) 214-4500, Fax (03) 214-4486

**Cleddau Valley, part of Operation Ark :**

Possum, mustelid and rat reduction has allowed stabilisation of the bird populations there, including the much loved whio.

**Eglinton Valley, part of Operation Ark :**

Possum, mustelid and rat reduction has allowed rejuvenation of the precarious bird populations there, including the lamentably rare mohua.

**Pembroke Wilderness Area :**

Possum control that has resulted in significant plant recovery.

**Stewart Island, alpine tops :**

Sustained cat control using 1080 has seen the Southern New Zealand Dotterel population rise from 60 to 250 over the last 10 years.

**Stewart Island bush :**

Rotational block poisoning over the last 3 years has seen the vegetation recover significantly and in particular Southern Rata has made a comeback.

**Takitimu Mountains :**

1080 poisoning of possums by Environment Southland has enabled endemic plants and geckos to stabilise.

Two of the above areas are worth expanding upon :

**Pembroke Wilderness Area – Fiordland National Park :**

Stage 1 1998/1999, Stage 2 1999/2000, Stage 3 2000/2002.

Stage 1 comprised of an area of 4238 hectares. This area with a boundary on the west of the Tasman Sea was being seriously damaged by possums. The ground work covered 1518 hectares and some 2800 hectares were treated by aerial 1080.

Ground operations relied largely on traps and cyanide. Because of the very rugged nature of Fiordland aerial application of 1080 poison is the only economical and successful method that can be used in most areas. Monitoring after the control operations showed a residual catch rate of 2.1% in the ground control area (approximately 2,750 possums killed)

The aerial 1080 worked area had a residual catch rate of .7%. Within a short time recovery of many plant species was evident. Rata die back has been reversed.

**Stewart Island/Rakiura :**

Possum damage in some areas of this island was huge with the possible future loss of some valued plant species. The development by the Department of Conservation

(Southland Conservancy) of a pest management strategy for Stewart Island/Rakiura lead to the formation of the "Stewart Island Pest Liaison Committee".

All interest groups and people who wanted to be involved worked with staff for a determined effort to control possums and other pest species. The results of this method of approach has without doubt been an outstanding success.

The reasons for this are as follows :

- Gives the community buy-in to the programme
- Because of this only ground operations are undertaken (1080 in bait bags)
- Community and recreation groups are also working with the Department of Conservation on their programmes e.g. possums, cat and rat control.

To date the control operations have covered 27,525 hectares from 2002 to 2006 with a residual catch rate average of .7%.

In both of the above examples interest groups and public were consulted.

In the case of the Pembroke area both ground and aerial methods were used. These methods are suited to that terrain. In relation to the operation undertaken on Stewart Island/Rakiura some local residents and recreational hunters strongly opposed aerial 1080 being applied. Some 3000 recreational hunters visit this island each year to hunt white tailed deer.

In fact these deer hunters are now carrying out a rat control programme on Stewart Island/Rakiura for the Department of Conservation and have put cat traps at huts for hunters to use during their stay.

#### **CONCLUSION :**

The Southland Conservation Board recognises that at times there is often a by-kill of native species with the use of aerial 1080. The board also recognises that some members of the public wish to see the end of 1080 poisoning in particular aerial application of 1080.

The board also understands that 1080 is only one of a number of ways to deal with animal pests.

The feral deer industry by commercial helicopter operations is slowly returning after a break of four years. This industry with recreational hunters is the primary means of deer control at no cost to the New Zealand tax payer. The industry can very quickly collapse if exported venison is found with 1080 or considered to come from a poison area before clearance.

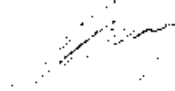
It is of the utmost importance that the use of 1080 poison be allowed to continue.

In particular the use of 1080 by aerial application must be used wisely as this appears to be the greater concern of the public.

The Southland Conservation Board believes that the risk of losing the right to use 1080 poison for pest control is real and could come from national and international demand. Therefore it's continued use shouldn't be taken for granted and systems must be in place to protect it's continued use as there is little evidence that another method is likely to replace it's use.

Thank you for giving this submission your consideration.

Yours faithfully,

  
(Chairman)

RECEIVED

31 JAN 2007

**From:**  
**Sent:** Tuesday, 30 January 2007 4:33 p.m.  
**To:** 'info@erманz.govt.nz'  
**Subject:** Submission on 1080

**Importance:** High

Attention : Applications Administrator (Hazardous Substances)

I refer to your letter dated 26 January 2007 to the Southland Conservation Board Chairperson (Re: Invalid Submission). Please be advised that the board does wish to be heard in support of its submission (particularly if some hearings are to be held in the South Island).

I will return the board's original submission in tonight's mail.

Thank you.

Regards,

*Community Relations Supervisor - Statutory Bodies  
Department of Conservation  
Southland Conservancy  
P O Box 743  
INVERCARGILL  
Ph: (03) 2112400*

Submission on the reassessment of Sodium fluoroacetate(1080) and substances containing 1080 (a vertebrate toxin).The applicants wish to continue to use 1080 for control of possums, wallabies and rabbits, and for targeted by-kill of rodents and mustelids (mainly stoats).

Name of person making submission: I.

Postal Address:

NEW ZEALAND.

Phone:

Fax

Contact E-mail:

Reason for submission:

As a deer farmer and a keen deer stalker, I would like to see a total ban on the use of fluoroacetate (1080) poison for pest control in N.Z.for the following reasons:

#### AERIAL SPREADING OF 1080

Aerial spreading of 1080 damages our environment as it exposes all creatures in the area to it. Of particular concern to myself is the by kill or deliberate kill of feral deer as I am a keen hunter and do not want to see deer and pig populations wiped out in N.Z.

1080 is soluble in water and even if it does not land in streams or lakes directly (although it often does), one heavy shower of rain will wash it into water courses which form streams, however temporary, and then into the catchment drain, be it a stream, a lake or the sea. In the area I hunt most, Lake Tarawera Reserve almost everything that lands on the hills, if it is soluble, it finishes up in the lake after a heavy rain.

#### AS A DEER FARMER

As a deer farmer a carcass contaminated with 1080 poison could stop our exports to Europe overnight whether it be a feral deer or a farmed deer accidentally poisoned, and exported, the result would be the same. Our venison(deer meat) is sold as game in Europe and European deer farmers and feral venison suppliers would like any opportunity to ban our product as we can produce venison so much cheaper than they can. 1080 contamination in my opinion would do more harm to our industry than a T.B. contamination scare. All carcasses are checked at the Deer Slaughter Plants for T.B. No such check exists for 1080 unless there is an obvious sign. Other Trading European countries such as England have T.B. in their feral animals - none have 1080 as it is banned in most other countries in the world

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Page 2 of 4

### AERIAL SPREADING BY G.P.S.

This is D.O.C.'s explanation for the accuracy of an Aerial 1080 drop. All aircraft used have GPS location devices to keep the drop away from waterways, farms and other sensitive areas. Unfortunately GPS is only as good as the person who programmes in the co-ordinates, 2 transposed figures programmed in wrong could easily fly a chopper 200 metres or more past a no drop point without the operator noticing it. A typing error may be picked up by reading it, and it not making sense – but a GPS entry would go unnoticed because they are just a series of numbers that mean nothing without a map. ( This phenomena was experienced with the crashing of the Air N.Z. plane into Mount Erebus some years ago. The GPS reading meant nothing to the pilots because they thought they were flying on the same flightpath as the previous trip.) How many times would this happen? How many times do you see a typing error or spelling mistake in a document? There is no spellcheck on GPS settings and a mistake is much harder to recognize.

### SCORCHED EARTH POLICY

1080 spread from the air kills all animals that eat 1080, or eat another creature that has died from 1080 poisoning. All dead possums or other animals that die become fly blown – these maggots or flies are eaten by our native birds such as Tits, Robins, Kiwis, fantails etc killing them as secondary poisoning. Dyeing baits green to stop bird deaths won't stop these type of insect eating birds being killed. DOC are aware of this secondary by kill by using it to target rats and mustelids. (ERMA N.Z. Consultation on Application. Top of page 2 HREO5002) In a previous drop in the Pureora Forest some years ago, Forest & Bird Society and DOC admitted there had been a 40% kill of North Island Robins, this is totally unacceptable.

### ANIMAL WELFARE

I believe 1080 is a cruel poison as it takes 6-18 hours for an animal to die if they take a lethal dose (reference DOC Website on information on 1080). During this time the animal suffers brain damage, muscular spasms and is in severe pain. If it doesn't take a lethal dose it still suffers these symptoms, but does not die in the immediate future. Animal Welfare act in N.Z. states if an animal is to be put down or killed it must be done as quickly and humanely as possible without causing unnecessary pain or suffering to the animal. 1080 does not fit this requirement at all.

### BY KILL OF DEER CULTURALLY INSENSITIVE

By kill of Deer is culturally insensitive. As a very keen deer hunter I find the by kill of deer by the spreading of 1080 totally unacceptable. Deer and pigs were brought to N.Z. by early explorers and settlers so future generations of would be able to continue the culture of hunting. I do concede that if deer and pig numbers get too high in any particular area they must be culled. This was done by feral helicopter hunters, however 1080 has virtually put an end to that form of control as processors are scared of getting contaminated carcasses and hunting is banned in 1080 areas. In a survey carried out by DOC titled "Issues and options for managing the impacts of deer on native forests and other ecosystems" in the late 1990's 72% of respondents wanted the deer populations managed and controlled as a hunting resource. This was not the result individual DOC members wanted and as far as I know nothing has been done as a follow up on the survey other than to print a booklet publicizing the results. Many dead feral deer have been found by hunters after a 1080 drop. Other countries manage their wild deer population as a game resource and hunting is a major cultural pastime in many of these countries. Hunting is a big part of my

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Page 3 of 4

culture and heritage as it is of many other New Zealanders, and I would like my grandchildren and their grandchildren to be able to carry on this sport as my ancestors did before me.

### LAKE TARAWERA

My favourite hunting spot is the Lake Tarawera Scenic Reserve. Since the 1080 drop over the Humphries Bay to Okataina area of bush over 15 years ago, targeting possums and wallabies, the possums and wallabies have come back but the insect eating native birds have not. There are plenty of Tui's, Bellbirds and Woodpigeons, but very few Black headed Tits, Fantails or other insect eating birds evident in this area over 15 years later. The numbers of Tuks, Pigeons, Bellbirds still around indicate that it is not only possums killing these birds but something else - I believe it was 1080. Also is it just coincidence that it was just after this 1080 drop that the world class Trout Fishery on Lake Tarawera collapsed, now there are very very few of the old strain of trout left, most are hatchery released fish or offspring of these fish nowadays. The environmental risk of spreading 1080 is too great.

### TO SUMMARISE MY SUBMISSION

I am a deer stalker, a deer farmer, a bird lover and an outdoors bush type person. I would like to see a total ban on the use of 1080 because:

- (1) It is cruel - animals take 6-18 hours to die, slow painful death, breaches animal welfare act.
- (2) Aerial spreading exposes all creatures in the bush and nearby waterways to 1080 poisoning as it is soluble in water, stays around for months. What lands on the hills washes into the waterway catchment, could go the way of DDT, Dioxin, Sheep dip etc in years to come contaminating our land.
- (3) 1080 gets into the food chain and waterways. Blowflies blow dead carcasses, other insects eat them or live in the soil below or near a carcass. These insects or grubs are eaten by birds. Birds such as the Endangered Native Falcon and Hawks may eat 1080 contaminated carcasses. This would kill them as a by kill.
- (4) It's not good to saturate our forests with 1080 poison, it spoils our clean green image, kills anything that eats it. Bad for our exports of Venison as much is sold alongside feral venison overseas. 1080 contamination of our venison could collapse our industry overnight, worse than a TB scare.
- (5) Too much reliance on GPS navigational control for 'no go' spreading areas, easy to make a mistake inputting co-ordinates. Once dropped over waterways, farms or other sensitive areas can't be picked up again.
- (6) Hunting is part of our culture. 1080 kills Deer and Pigs - ruins hunting. DOC Survey of management of feral deer - 72% of respondents wanted deer managed as a game animal. DOC have ignored results of their own survey - kill deer indiscriminately by aerial 1080 poisoning.

### CONCLUSION

- (a) I would like to see 1080 totally banned as a pest control agent in N.Z whether in Bait Stations or aerial spreading. All aerial spreading of any poisonous bait for animal pest

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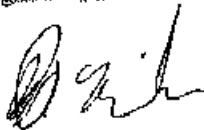
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control should also be banned, and only allowed to be used in bait stations where it can be controlled.

- (b) Some form of bounty could be paid out for the killing of possums, wallabies, mustelids etc. Some form of market could be found for skins or fur, with Govt help. Pest control has been most successful in N.Z when it became commercially viable, e.g. possum skins in the 1960s and feral venison recovery in the 1970s & 1980s - at \$5 per possum - \$20million dollars would mean 4 million dead possums.

I wish to speak at a public hearing in support of my submission.

Signed :-



ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
 NGĀ KAIWHAKATŪPATO WHAKARARU TAIAO



9141

## Submission Form

Please feel free to write on or photocopy this form.  
 We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission	_____
Contact person	_____
Contact address	_____
Phone	_____
Fax	_____
E-mail	_____

This submission is about -  
 Application number:

1080 REVIEW

Application by THE ABOVE (applicant name)

to SUPPORT THE CONTINUED USE OF 1080 (application purpose)

Reason for submission (attach supporting information)	<u>AS A MEMBER OF THE OTAGO RAHC AND A DAIRY FARMER OF SOME 30 YEAR I HAVE SEEN TB. IN CATTLE GO THROUGH ITS CYCLE FROM OVER 300 HERD INFECTED IN OTAGO DOWN TO UNDER 30 WHERE IT IS NOW WHICH COULDN'T HAVE HAPPENED WITHOUT THE USE OF 1080 IT IS ESSENTIAL TO FINISH THE JOB AND PROTECT OUR OVERSEAS MARKETS.</u>
What decision do you seek (optional)	<u>CONTINUED SUPPORT FOR THE USE OF 1080</u>
Do you wish to be heard in support of your submission? <sup>1</sup> (at a public hearing)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Signature

\_\_\_\_\_

Date

30/1/07

Post to: ERMA New Zealand  
 P O Box 131, Wellington

Fax to: ERMA New Zealand  
 (04) 473-8433

<sup>1</sup> Please note that if any submitter indicates they wish to be heard, the Authority is obliged to hold a public hearing.