

Application for DOC permission to use VTAs: assessment report

Applicant name:	Contract Wild Animal Control New Zealand
Operation name:	Predator Control in the Arthur Sinbad and Cleddau – Tiakina Nga Manu (Battle for our Birds) Programme
Approving manager:	Aaron Fleming, Director Operations, Southern South Island
Assessor:	s 9(2)(a) [redacted] Technical Advisor Threats, Invercargill
Date received:	3/4/2019
Overview:	<p>It is proposed that the following pesticide uses will be applied:</p> <p>Pesticide Use #1 - sodium fluoroacetate 1.5g/kg cereal pellet aerial</p> <p>Pesticide Use #140- sodium fluoroacetate 1.5g/kg cereal pellet aerial</p> <p>Pesticide Use #2 - sodium fluoroacetate 1.5g/kg cereal pellet hand-laid</p> <p>Pesticide Use #141 - sodium fluoroacetate 1.5g/kg cereal pellet hand-laid</p> <p>Permission is sought for toxic application starting on or after 1 July 2019 and ending on or before 30 June 2020.</p> <p>Non-toxic prefeed will be applied no earlier than 17th June 2019.</p> <p>Primary method to be employed is aerial 1080 with hand laid 1080 to be used within ground-exclusions and buffer areas as required.</p> <p>Consent Application Area: 31,583 hectares Aerial Treatment Area: 17,924 hectares Potential Ground Treatment Area: 346 hectares N.B. Aerial application and ground-exclusion hectares are to be confirmed once PHU and DOC final consent condition requirements are fully incorporated into operational mapping.</p>
Applicant type:	DOC SOP's apply

Step 1 Confirm application is complete <i>Are all documents (listed below) provided?</i>	
DOC Application form complete: <i>Are all sections of the DOC Application Form completed to a standard that you can assess them? Where are the</i>	The Application form was completed to a high standard for assessment with no significant information gaps.

<p><i>information gaps? Is the operational information for treatment blocks clearly separated in each section of the application form where differences exist between them? Does the proposed application meet the grouping standard (see Applying for DOC permission for external agencies or Operational planning for animal pest operations SOP ? Where required, was the AEE section completed?</i></p>	<p>It included the AEE section, which assesses the actual and potential environmental effects of controlling possums, stoats and rats in this area with this methodology.</p> <p>The applicant acknowledges the DOC Code of Practice for aerial 1080 in kea habitat and states they will adhere to all these standards to ensure risk to kea is minimised.</p>
<p>Are all the proposed pesticide use(s) accepted for use? <i>Check the Status List category and if any compulsory restrictions apply. If any compulsory information needs apply, consider if the operation is designed to provide the required information.</i></p>	<p>Pesticide use #1, #2, #140 and # 141 are accepted for use. There are no compulsory restrictions or compulsory information needs apply.</p>
<p>Performance standards sheets <i>Is there a performance standard sheet for each pesticide uses proposed, and trapping if applicable?</i></p>	<p>Yes</p>
<p>DOC permission map(s) (image file or files)</p>	<p>Maps included on the AEE meet the required standard.</p>
<p>DOC Pesticide Summary shapefiles (independent groups or individuals only) <i>Are the control methods clearly assigned to each treatment block? Do operational boundaries and warning sign locations match the DOC permission map(s)?</i></p>	<p>The warning signs on the map are not large enough and are hidden behind other marks.</p> <p>Requested the application to adjust the warning signs 10/4/2019</p> <p>New map received 15/5/2019</p> <p>In discussion with ^{s 9(2)(a)} [REDACTED] it was requested that the maps be redrawn to meet the BFoB standards request sent 7/6/2019 new maps received 23/6/2019</p>
<p>Consultation record including conditions of landowner consents <i>Was level of consultation adequate? All required owner/occupier consents obtained? Are conditions of consent evident in their application?</i></p>	<p>The Department of Conservation has an ongoing consultation and notification process in place.</p> <p>The 'Arthur Sinbad Cleddau Communications Plan' is held by the Department of Conservation, in its electronic DOCDM system. DOC-5672792</p> <p>This is a live document that will be updated by Contract Wild Animal Control New Zealand at regular intervals throughout the operational period.</p>


^{s 9(2)(a)} [REDACTED]

	It will be available through the DOCDM system: FNP-19-BFOB All Sites. This includes ongoing consultation with the local iwi.
Public health permission/ proof of application <i>Proof of application for public health permission is adequate to process the application, as long as the public health permission and associated application form is sighted prior to approval.</i>	A copy of the submitted application form to the public health for permission was supplied.
Other (specify, e.g. RMA consent)	None required
Your confirmation email and subsequent correspondence <i>Include dates and nature of requests for further information.</i>	<ul style="list-style-type: none"> The AEE permission document was received on 3rd April 2019 Email confirmation was given on 3rd April 2019
Step 2 Capture treatment blocks in the Pesticide Application	
Your publication of the proposed operation on the DOC Pesticide Summary (independent groups or individuals only) <i>Include date and note any issues.</i>	N/A DOC operation
Step 3 Evaluate control method <i>Is the proposed method suited to the pest problem, treatment area and consultation outcomes?</i>	
Your assessment of the control method <i>Include relevant points from the 'Choose your control method' part of Current Agreed Best Practice, where available.</i>	<p>Aerial distribution of 1080 is the only viable method for achieving a rapid knockdown of rats and possums over this size of area and terrain and in a short timeframe. The control method is in line with DOC national practices for rat and possum control over large areas.</p> <p>The history of controls confirms this is an effective control strategy for this area. Aerial 1080 distribution allows for a quick knock down of rats and possums over large areas. Outcome monitoring in this area has shown control techniques to be effective in reducing pest numbers for conservation gains.</p>
Label directions <i>Check the product label to ensure that the proposed method detail complies with the label content.</i>	The proposed control method complies with applicable directions for use (aircraft, bait stations, weather conditions) and other content on product label.
Summary of any technical advice received on the proposed control methods.	The DOC AEE was reviewed by s 9(2)(a)
Summary of any Community relations and Pou Tairangahau advice received.	Communication plan DOC-5672792
Step 4 Identify and assess risks and adverse effects <i>Are you satisfied that all risks and adverse effects have been identified?</i>	

s 9(2)(a)

<p>Are there any gaps in the applicant's assessment of these (where the AEE section was supplied)?</p>	<p>Risks and Adverse effects are described in full in the AEE DOC-5933285</p>
<p>Relevant points from the DOC Pesticide Information Reviews</p>	<p>1080 Pesticide Info Review---Non-target native species of relevance;</p> <p>Kereru (NZ pigeon/kukupa (<i>Hemiphaga novaeseelandiae</i>)) have not been monitored individually when exposed to this method and bait type. However, none of the six birds ate non-toxic cereal pellets offered in a trial on Kapiti island (Spurr & Powlesland 1997).</p> <p>Monitoring of kereru during 5 aerial 1080 operations using cereal pellets did not detect population changes using the five minute count method (Spurr & Powlesland 1997).</p> <p>Additionally, all 15 radio tagged birds exposed to an aerial 1080 operation using carrot bait survived (Powlesland et al. 2003).</p> <p>A total of 35 radio tagged Kaka (<i>Nestor meridionalis</i>) have been exposed to this method and bait type over 2 operations and none have died from poisoning.</p> <p>Additionally, 38 radio tagged birds have been exposed to 0.08% carrot baits over 2 operations and none have died from poisoning (Greene 1998; Powlesland et al. 2003).</p>
<p>Summary of any technical or community relations advice received</p>	<p>Discussions with Technical Advisor s 9(2)(a) - and a solid literature search which is referenced in the plan</p>
<p>Other resources consulted (<i>specify</i>)</p>	<p>All significant risks and adverse effects associated with aerial and ground 1080 baits have been identified and discussed in the AEE prepared for this area.</p> <p>The relevant and most up to date pesticide use sheets have been included in the AEE and cover the range of control techniques to be applied.</p> <p>Sowing rates (1.5kg/ha RS5 pellets) and flight lines are in line with the method best practice for aerial 1080 cereal operations, risk of failure is low.</p> <p>The use of 12gm/20mm pellets is in line with Best Practice when controlling moderate densities of possums.</p>

	<p>Pre- feeding is compulsory and will be undertaken prior to the toxic bait.</p> <p>Native non-target exposure; Deaths of individual native birds may occur, however the likely incidence of this is low. Control of possums, rats and beneficial by-kill of stoats should result in improved nesting success for native birds.</p>
<p>Your assessment of technical risks and adverse effects (e.g. the pesticide use, use pattern, site factors)</p>	<p>All significant risks and adverse effects associated with aerial and ground 1080 baits have been identified and discussed in the AEE prepared for this area.</p> <p>SIPRAG (South Island Predator Response Action Group) have stated that aerial 1080 is the preferred method for rat and possum control at Battle for our Birds Sites</p> <p>The relevant and most up to date pesticide use sheets have been included in the AEE and cover the range of control techniques to be applied.</p> <p>Sowing rates (1.5kg/ha) and flight lines are in line with the method best practice for aerial 1080 cereal operations, so risk of failure is low.</p> <p>Hand laying will occur in areas of high use this will mitigate any adverse effects on people</p> <p>Pre- feeding is compulsory and will be undertaken prior to the toxic bait.</p> <p>Native non-target exposure; Deaths of individual native birds may occur, however the likely incidence of this is low. Control of possums, rats and beneficial by-kill of stoats should result in improved nesting success for native birds.</p> <p>Dogs: There is a risk to domestic dogs, however this is a National Park and no dogs should be present in this area.</p>
<p>Your assessment of non-technical risks (e.g. high public use, consultation outcomes)</p>	<p>This area is a high use public area. All care has been taken to identify areas of risk and mitigation has been put in place to ensure there is little or no risk to the public</p>
<p>Step 5 Calculate estimated caution period and evaluate if risks and adverse effects are at an acceptable level Will risks be managed adequately with the performance standards proposed for this operation? Include dates and outcomes of any discussion with the applicant.</p>	
<p>Estimated caution period for all the pesticide use(s)</p>	<p>10 months for Pesticide use # 1 #2 # 140 #141</p>

<p><i>Does this differ from the recommended caution period in the Caution period calculator?</i></p>	<p>The mean temperature is likely to be less than 10 degrees.</p> <p>Sites are dry</p>
<p><i>How well does the proposed operation manage potential risks to native fauna? (i.e. as proposed in the Application form or performance standards)</i></p>	<p>The operation will comply with the Aerial 1080 in Kea Habitat Code of practice. The Conservation Trust were consulted and they are happy for this operation to go ahead in accordance with the Code of Practice.</p> <p>To ensure no harm to other species bait size and % cover will comply with best practice methods for aerially applied 1080.</p>
<p><i>How well are other potential risks managed? (i.e. as proposed in the Application form or performance standards)</i></p>	<p>All walking tracks in the treatment area are open but baits will be cleared from them as soon as practical after toxic baiting. CWACNZ will have staff at the DOC huts notifying the walkers of the operation and advising them to remain in the hut during the actual aerial application period.</p> <p>At each hut a square 150m by 150m centred on the hut will be excluded from toxic baiting by air but not aerial prefeeding.</p> <p>All water intakes for huts will be disconnected during the operation and will be reconnected after the operation.</p> <p>The Arthur River, Joes River, Cleddau River, Tutoko River, Gulliver River, Donne River and any larger tributaries will be treated as a sensitive boundary with a 50m buffer supported by trickle sowing.</p>
<p>Are you satisfied with the proposed warning sign locations and normal points of entry?</p>	<p>Myself (s 9(2)(a) [redacted] Technical Advisor Threats and s 9(2)(a) [redacted], Regional Lead Battle for our Birds) discussed the location of the warning signs and determined they were at the most appropriate locations.</p> <p>Photos of each sign and gps location will be entered into warning sign register and handed over to DOC once complete. Install signs as per sign register.</p>
<p>Public health permission, including application form sighted (if not provided at time of application) <i>Consider if public health permission has any impact on DOC permission conditions.</i></p>	<p> 29042019 Arthur Cleddau Permit.pdf</p> <p>A copy of the submitted application form to the public health for permission was supplied. Signed permission received 7/5/2019</p>

Other resources consulted (<i>specify</i>)	
Which additional performance standards should be applied and why? <i>Consider impacts of conditions from other consents. Consider if the additional performance standards specific and auditable, and can be justified.</i>	As there are Kea within this area the operation must comply with the Aerial 1080 in the Kea Habitat Code of practice
Step 6 Make a recommendation <i>Should the application be approved or declined?</i>	
What key points should the approving manager have drawn to their attention?	Proposed operation should achieve required results and outcomes. Like all 1080 operations throughout New Zealand there is some concern by the public. To ameliorate any harm to DOC staff and contractors loading site security will be provided by First Security (under contract to CWACNZ) as part of the BfoB national security contract. There is a gate near the main road that will be secured
Is approval or decline recommended? <i>If declined, summarise reasons. If approved, is a readiness check recommended (DOC operations only – see Pre-Operational Step 7 of the Operational planning for animal pest operations SOP)?</i>	Recommend
Step 7 Prepare documents and advise manager	
For recommended approval: <i>Attached correct draft letter of permission, DOC Performance Standards sheet(s) and map(s) of operational boundaries.</i>	See attached letter DOC Performance Standards
For recommended decline: <i>Attach draft letter of decline including a summary of reasons.</i>	

Record of permission decisions that differ from the assessor recommendation	
Record of permission decision <i>Only complete this section where the manager has made a decision that differs from the assessor's recommendation. For example, where the manager decides on different operational timing or warning sign locations or rejects a recommendation to approve or decline the application.</i>	

s 9(2)(a)

Where required, complete this in Section 7 (Approving or declining DOC permissions), Step 2. Record the difference between the decision and recommendation and summarise the reason(s) for the decision.

--

Released under the Official Information Act

