

29 November 2024

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Tēnā koe [REDACTED]

Thank you for your request to the Department of Conservation (DOC), received on 1 November 2024, in which you asked for information on the proposal for a Predator Free Rakiura / Stewart Island.

We have considered your request under the Official Information Act 1982. Your questions and our responses are listed below:

1. *The full and complete Biodiversity Monitoring Baseline Studie/s / Plan/s If these studies / plans are still in draft - we require the date as to when they will be finalised and made public.*

Biodiversity monitoring plan/s for Predator Free Rakiura are not yet drafted. The estimated timeline for development is mid-February 2025. We will make these plans publicly available once completed.

2. *The Biosecurity Plan - whether in draft or finalised. If this plan is still in draft - we require the date when it will be finalised and made public.*

The following link (<https://www.predatorfreerakiura.org.nz/the-project/community-updates/from-concept-to-action/>) takes you to the Predator Free Rakiura project's website. All publicly available material on the project can be found there, including the conceptual plan for Predator Free Rakiura. This high-level overview describes six streams of work required to achieve Predator Free Rakiura, one of which is the approach to biosecurity design and planning.

A collaborative process for developing this plan is already underway. Te Puka Rakiura Trust (TPRT) is leading development work, with support from the Centre of Excellence for Biosecurity Risk Analysis, in consultation with the local community and experts. This work will inform future partner activity and the development of a supporting management system. I understand a draft will be completed by July 2025.

3. *The complete Health & Safety Plan along with the full Hazard Register. If this Plan and the Hazard Register are still in draft - we require the date when they will be finalised and made public.*

The above link also contains information relating to the operational risks and mitigations. DOC does not hold a copy of Zero Invasive Predators' (ZIP) Health and Safety Plan but I understand that ZIP will have a final version completed by the end of this year.

The permissions required to use predator control methods such as pesticides include thorough risk assessments.

DOC permission applications for pesticide use requires an assessment of environmental effects, including effects on non-target species. The application must include planned actions to avoid, remedy or mitigate any adverse effects.

The Ministry of Health permission application requires an assessment of all areas within the operational area, and within 150 metres of the operational boundary, where a risk to public health may be created. The applicant must make specific plans to manage the potential risk in these areas. This permission application also requires an assessment of drinking water supply intakes within the operational area, and within 400 metres of the boundary of an aerial operational area. The applicant must contact the owner/operator of each supply to discuss risks and mitigations and include in the permission application a plan to mitigate risk for each individual water supply.

4. *Copies of all Consents required in order to carry out the proposal for a predator-free Rakiura whether finalised or in draft form. Including but not limited to those issued or to be issued by: • The Department of Conservation • Environment Southland • Southland District Council • Ministry of Health • Ministry of Primary Industries • Any other consenting body or organisation.*
5. *Copies of all applications for consents referred to in 5. 1 7.*

ZIP will require consent (permission) from the Department of Conservation and the Ministry of Health to use predator eradication tools, and a resource consent from Environment Southland in relation to the potential noise from helicopters, as part of operations for Predator Free Rakiura. These consent applications have not yet been submitted and therefore are not held by the Department, Ministry of Health or Environment Southland. This part of your request is therefore refused under section 18(g)(i) of the Official Information Act.

ZIP does not require consents from the Southland District Council or from the Ministry of Primary Industries for Predator Free Rakiura operations.

6. *Reasoning behind the proposed or formed company: Predator-Free Rakiura Limited along with: • Names of all directors • Names of all proposed shareholders and their shareholdings.*

A company with charitable status has been established by ZIP to provide effective governance and oversight of the operational delivery of the project. Further details can be viewed on the Companies Register at:

<https://app.companiesoffice.govt.nz/companies/app/ui/pages/companies/9272440>

7. *Details of all entities involved in the Predator-Free Rakiura Project.*

- DOC
- Zero Invasive Predators (ZIP)
- Te Puka Rakiura Trust (TPRT)
- Predator Free Rakiura Engagement and Advisory Group (EAG), which includes representatives from:
  - The four Papatipu Rūnanga o Ngāi Tahu ki Murihiku
  - Southland District Council
  - Rakiura Māori Lands Trust
  - Rakiura Tītī Islands Administering Body
  - Rakiura Tītī Committee
  - Environment Southland
  - Fishing interests
  - RealNZ representing tourism business interests
  - Stewart Island Rakiura Environment and Conservation Trust
  - Stewart Island Community Board
  - Department of Conservation
  - Local community representatives
  - Hunting Interests (Southland Branch of the New Zealand Deerstalkers Association, Rakiura Hunters Camp Trust)

8. *Details of all influencers, and their credentials / qualifications that have been or are being used in the predator-free Rakiura project.*

No social media influencers have been engaged.

9. *Full details of all public consultation carried out including: • Physical meetings: dates, times, presenters, invitees • How notification was carried out • Credentials and qualifications of all presenters • Written information supplied to the public: Dates, times, where published.*

The following is a summary of open-invitation engagement events that Predator Free Rakiura has hosted since 13 August 2024, when it was announced that planning was beginning for the first stage of operations towards a predator-free Rakiura.

### **Biosecurity engagement: Rat Pathways Workshop**

- Oban, Stewart Island: 6pm onwards
  - 2 Sept 2024
  - 3 Sept 2024
- Bluff: 1pm onwards 5 Sept 2024
- Promotion
  - Invitation emailed directly to stakeholders
  - Event published in two editions of the Stewart Island News
  - Flyer posted on community noticeboards
- Hosted by:
  - CEBRA CEO
  - Associate Professor

### **Bookable drop-in sessions**

- Oban, Stewart Island: 10am-7pm
  - 15 Oct 2024
  - 16 Oct 2024
  - 5 Nov 2024
- Bluff, Southland: 10am-7pm 6 Nov 2024
- Promotion:
  - Invitation emailed directly to stakeholders
  - Flyer delivered to Oban PO boxes
  - Notification posted on the Predator Free Rakiura Facebook page
  - Event published on the Predator Free Rakiura website
  - Published as events in the Rakiura Calendar
  - Flyer posted to Oban community noticeboard
  - Flyer available in DOC visitor centre
- Hosted by:
  - Zero Invasive Predators Operations Director
  - Zero Invasive Predators Technical Innovator (not present 5-6 Nov 2024)

### **Written updates**

- One Step Closer project update
  - Published 13 Aug 2024
  - Published to the Predator Free Rakiura website
  - Emailed directly to stakeholders
  - Post on Predator Free Rakiura Facebook and LinkedIn pages
  - Pinned to community noticeboard in Oban
- Join the Discussion project update
  - Published 4 Oct 2024
  - Published to the Predator Free Rakiura website
  - Emailed directly to stakeholders
  - Posted on Predator Free Rakiura Facebook and LinkedIn pages
  - Pinned to community noticeboard in Oban
  - Delivered to Oban PO boxes
  - Posted to Stewart Island Buy/Sell/Exchange Facebook group

- Community update
  - Published 24 Oct 2024
  - Published to the Predator Free Rakiura website
  - Emailed directly to stakeholders
  - Posted on Predator Free Rakiura Facebook page
  - Pinned to community noticeboard in Oban
  - Delivered to Oban PO boxes
  - Posted to Stewart Island Buy/Sell/Exchange Facebook group
- Conceptual Implementation Plan
  - Published 7 Nov 2024
  - Published to the Predator Free Rakiura website
  - Emailed directly to stakeholders
  - Posted to Stewart Island Buy/Sell/Exchange Facebook group

The Department does not hold specific details of the hosts'/presenters' qualifications, but I note that many of these are searchable online. This part of your request is therefore refused under sections 18(d) and 18(g) of the Official Information Act because the information available is either publicly available, or not held.

*10. Reasoning behind how the Project Partners for Predator-Free Rakiura were selected and the requirement made for them to consult with their groups and the reporting of such back to Predator-Free Rakiura / DOC.*

A successful eradication of this scale will require a collaborative approach. Partners came together because they had a strong desire to see improved ecosystem health and functionality, and a more sustainable long-term future for the island community nestled within it. This group became known as the Predator Free Rakiura Leadership Group (PFRLG). The purpose of PFRLG was to raise awareness of the vision and benefits that will result following successful predator removal.

Having largely achieved this objective, the group evolved into the Engagement and Advisory Group (EAG), which provides a consultative connection to Te Puka Rakiura Trust. The EAG voices community feedback to the project, and tests ideas put forward by the project team. Where relevant, decisions made during regular meetings are shared with each representative's organisation.

Around two years ago, Te Puka Rakiura Trust was engaged by DOC to develop a high-level implementation plan (linked as part of the response to question 3). This plan recommended ZIP leads the design and operational phase of the project, given its capability in delivering similar operations on the mainland. DOC endorsed this recommendation, and ZIP was engaged to design the eradication phase.

*11. If and how the Department of Conservation has passed on the authority for predator control in Stewart Island and its surrounding Islands to another entity including Predator-Free Rakiura or Predator-Free Rakiura Limited.*

DOC has not passed on the authority for predator control to another entity. However, it is not uncommon for other entities to carry out predator control on public conservation land.

A good example of this is the Stewart Island / Rakiura Community and Environment Trust (SIRCET), who lead predator control/suppression around Oban and Ackers Point.

It is also important to note that Predator Free Rakiura is not a predator control/suppression project. It is an eradication project that aims to completely remove all target species. Target species include feral cats, three species of rat, possums and hedgehogs.

*12. How conflicts of interest have been identified and managed. Proper decision making.*

DOC manages conflicts of interest by distinguishing between accountabilities and ensuring these sit with different decision makers. In Predator Free Rakiura's case, accountability for decisions relating to permissions sit with the Southern South Island Operations Director, while accountability for DOC's support of the Predator Free Rakiura project sits with the Director, National Programmes.

Please note that this letter (with your personal details removed) and attached documents may be published on the Department's website.

Nāku noa, nā



Ben Reddiex  
Director National Programmes  
Department of Conservation  
*Te Papa Atawhai*