



28 January 2025



Tēnā koe 

Thank you for your request to the Department of Conservation, received on 17 December 2024, in which you asked for:

*I was informed that there was a comment arising from a DOC communication that birds admitted to wildlife rehabilitation during a HPAI outbreak fare worse than those left in the field. Can you please confirm DOC is the source of this startling statement or has it arisen from MPI? I need to immediately address this statement and request responses to the following;*

1. *Is there a source document? If so, please forward it to me for review.*
2. *Internationally, data show that ~66% of all wildlife admitted to rehabilitation will die - from their injuries, illness, or by euthanasia. That is a normal death rate, accepted and proven through professional centers keeping accurate records. Wild animals will not readily allow themselves to be caught by a predator (humans are predators) unless they are too injured or ill to avoid capture. Therefore, birds that can still avoid capture by the predator will avoid capture. Therefore, it is not that rehabilitation is a poor option, rather the casualty's entering rehabilitation are very compromised. Euthanasia is therefore an ethical and humane option. Comments?*
3. *Euthanasia helps reduce suffering and should be regarded as a form of treatment. This excerpt from Animal Welfare Regulations 2017 Regulatory Impact Statement 'The New Zealand animal welfare regulatory system is designed to ensure our animals are treated appropriately and to ensure they do not suffer unnecessarily.' Does DOC not recognise or uphold this statement in the Animal Welfare Act as applied to Wildlife?*
4. *That this statement is being passed on to staff and others is of major concern as it again calls in to question the ethical and legal obligations that DOC abides by. Does DOC not recognize that HPAI causes suffering?* 
5. 

*What is NZ offering to the*

*rehabilitation community to help rather than undermine responsible, permitted rehabilitators to provide a service that aids society and the wildlife we share our space with by reducing potential zoonotic issues and suffering?*

We have considered your request under the Official Information Act 1982.

Our responses are listed below:

1. *"I was informed that there was a comment arising from a DOC communication that birds admitted to wildlife rehabilitation during a HPAI outbreak fare worse than those left in the field. Can you please confirm DOC is the source of this startling statement or has it arisen from MPI? I need to immediately address this statement and request responses to the following;  
Is there a source document? If so, please forward it to me for review."*

We are not aware of this statement being made by the Department of Conservation, and we are not aware of any source document that contains this statement.

- 2-5. Your questions 2-5 cover topics related to euthanasia and welfare. The Department of Conservation is engaged in preparing for the arrival of highly pathogenic avian influenza strain H5N1 (HPAI H5N1) in a One Health approach together with the Ministry of Primary Industries, the Ministry of Health, and Health New Zealand/Te Whatu Ora. Information on our approach is available on the websites of all One Health partner organisations<sup>1</sup>. Engagement with the conservation community outside government is underway.

Current international advice is to avoid contact with sick birds during H5N1 outbreaks, and to leave animals in-situ to; avoid causing stress and disturbance to the animals, to reduce spread of the virus, and to minimise the risk to human health. Where there is a public health or domestic animal health risk e.g. in public places, then the advice is to remove bodies.

While diseases such as bird flu can have a devastating impact, some wildlife will recover. Adapting to disease is a natural process and over time wildlife populations develop immunity. Interfering in this process can reduce the ability of species to respond to future waves of bird flu.

There are human health and safety issues associated with handling birds with H5N1 for euthanasia. Techniques which expose the operator to feathers, secretions, aerosols or tissues are not considered appropriate from a human health and safety perspective. This poses a significant limitation on delivery of humane euthanasia.

---

<sup>1</sup> Please see: DOC <https://www.doc.govt.nz/our-work/wildlife-health/avian-influenza/>, MPI <https://www.mpi.govt.nz/biosecurity/pest-and-disease-threats-to-new-zealand/animal-disease-threats-to-new-zealand/high-pathogenicity-avian-influenza/>, Health NZ <https://info.health.nz/conditions-treatments/infectious-diseases/avian-influenza>.

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

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

Nāku noa, nā



Hilary Aikman  
Director Terrestrial Biodiversity  
Department of Conservation  
*Te Papa Atawhai*