



9 July 2025

Whare Kaupapa Atawhai/
Conservation House 18
Manners Street Te Aro,
Wellington
6011
doc.govt.nz
Ref: OIAD-5262

Tēnā koe [REDACTED]

Thank you for your request to the Department of Conservation (DOC) and the Minister of Conservation, received on 26 May 2025, in which you asked for:

- “1. All submissions received both for and against?*
 - 2. All responses given to all submitters?*
 - 3. Full responses to Protect Rakiura Trust’s submission on 13th and 14th May 2025?*
 - 4. How the Aaron Fleming carried out the “Assessment” to arrive at his/DOC’s decision.*
 - 5. Full documentation of the process including how each submission and each question was assessed and reasons for the assessment - including all back up data supporting the assessment.*
 - 6. Full application to DOC (assuming this was ZIP or was it Predator-Free Rakiura and ZIP applying) and to the Ministry of Health.*
 - 7. Full permits issued by DOC and from the Ministry of Health.*
 - 8. Who was responsible for processing the application at DOC.*
- *What are their credentials?*
 - *How did DOC manage conflicts of interest?*
 - *Full documentation of the assessment for the DOC application.”*

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

On 25 June 2025 I wrote to you to advise you that I had decided to release this information to you (subject to some information being withheld), but that the information and documents would follow at a later date. Your questions and our responses are now listed below:

- 1. All submissions received both for and against?*

The Department was not required to run a submission process for the Pukunui Operation. However, due to a miscommunication involving hunting interests, New Zealand Deerstalkers Association (NZDA) advised their members to provide submissions on the proposed Pukunui Operation. Please also note that for a suppression operation like the Pukunui Operation, DOC consults with affected parties on effects, not methods. Where affected parties raise concerns around potential effects, DOC conducts a risk assessment. For a full explanation of the

requirements around consultation on effects, please refer to the responses provided to you as part of a previous OIA on this topic (OIAD-5226).

2. All responses given to all submitters?

While a number of emails were received as a result of NZDA's incorrect advice to its members, no formal submission process was run. DOC did acknowledge receipt of all feedback regarding the operation.

3. Full responses to Protect Rakiura Trust's submission on 13th and 14th May 2025?

The questions listed in Protect Rakiura Trust's letter were responded to on 26 May and 24 June 2025.

4. How the Aaron Fleming carried out the "Assessment" to arrive at his/DOC's decision.

I am sharing the Decision Support Document for the Pukunui Operation with you. I have decided to release the relevant parts of this document, subject to information being withheld under section 9(2)(g)(ii) of the OIA – to protect Ministers, officials, or employees from improper pressure or harassment.

5. Full documentation of the process including how each submission and each question was assessed and reasons for the assessment - including all back up data supporting the assessment.

Please see the Decision Support Document. This summarises the process that were followed to assess the application.

6. Full application to DOC (assuming this was ZIP or was it Predator-Free Rakiura and ZIP applying) and to the Ministry of Health.

I am sharing with you ZIP's application for the Pukunui Operation. I have decided to release the relevant parts of this document, subject to information being withheld under section 9(2)(g)(ii) of the OIA – to protect Ministers, officials, or employees from improper pressure or harassment.

7. Full permits issued by DOC and from the Ministry of Health.

I am sharing with you the DOC permission and Public Health Unit permission for the Pukunui Operation. I have decided to release the relevant parts of these documents subject to information being withheld under section 9(2)(g)(ii) of the OIA – to protect Ministers, officials, or employees from improper pressure or harassment.

8. *Who was responsible for processing the application at DOC?*

- *What are their credentials?*
- *How did DOC manage conflicts of interest?*
- *Full documentation of the assessment for the DOC application.*

Processing of the DOC permission for the Pukunui Operation was coordinated by a Permissions Advisor, who is trained in ensuring regulatory standards are met for DOC permissions issued under the Hazardous Substances and New Organisms Act, and that the permission is also compliant with the National Parks Act, Wildlife Act, and Reserves Act.

The Permissions Advisor was supported by a technical team, which provided specialist advice to the Decision Maker. The technical team included the following roles:

- An “Assessor”, who led the evaluation of the proposed operation and ensured specialist technical advice was sought where needed. This person has extensive experience leading animal pest control operations throughout New Zealand, including industry qualifications and internal DOC training.
- A “Technical Advisor”, who has specialised ecological knowledge to assess risks and benefits for wildlife from the operation. This person has advanced tertiary qualifications and extensive experience managing threatened wildlife populations. This person was also supported by a “Technical Advisory Group”, consisting of two ecologists with similar qualifications, including specialised knowledge of southern New Zealand dotterel.
- A lawyer, who ensured the permission is compliant with all relevant legislation.
- Various subject matter experts, who commented on specific aspects of the proposed operation.

Potential conflicts of interest were managed through the following steps:

1. The “Assessor” described above is required to be a person with no direct connection to the operation, or close involvement in its planning or preparation prior to the permission application.
2. All proposed DOC aerial 1080 operations are peer reviewed prior to permission being sought. The “Peer Reviewer” is a formal role within DOC’s Animal Pest Operational Planning process, which involves a person with equivalent qualifications and experience to the “Assessor” reviewing the proposed operational plan, including the risk management controls within it.

Regarding documentation of the assessment of the DOC permission application, please refer to the Decision Support Document for the Pukunui Operation already mentioned.

In making my decision to withhold information under section 9 of the OIA, I have considered the public interest and determined there are no public interests that outweigh the grounds for withholding. 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 OIA.

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

Nāku noa, nā



Ben Reddiex
Director National Programmes
Department of Conservation
Te Papa Atawhai

Document schedule

Item	Date	Document description	Decision
1	May 2025	Decision Support Document for the Pukunui Operation	Released in part
2	May 2025	ZIP application for the Pukunui Operation	Released in part
3	May 2025	DOC permission for the Pukunui Operation	Released in part
4	May 2025	PHU permission for the Pukunui Operation	Released in part
5	May 2025	Permission letter	Released in part