



Whare Kaupapa Atawhai/
Conservation House 18
Manners Street Te Aro,
Wellington

8 September 2025

6011

Ref: OIAD-5552

Tēnā koe

Thank you for your request to the Department of Conservation (DOC), received on 11 August 2025, in which you asked a number of questions related to evaluation process for toxins used for DOC, DOC personnel exposure to toxin use, and various requests regarding monitoring on Rakiura.

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

Your questions and our responses are listed below – please note we have grouped related questions:

- 1. Please provide me with the full details of the evaluation for toxins that are considered acceptable and/or humane by the Animal Ethics Committee that DOC/ZIP are relying on to determine which toxins to use in pest management, in particular 1080 and brodifacoum, but not excluding other toxins.*
- 2. Please provide me with DOC/ZIP protocols/standards showing full details of the evaluation for toxins that are considered acceptable and/or humane and how these protocols/standards have been arrived at.*
- 3. Please provide me with full details of which animal ethics committee/s DOC/ZIP rely on for evaluation and advise.*
- 4. Does DOC/ZIP consult with any other countries in setting protocols/standards for use of toxins for pest management, in particular 1080 / brodifacoum?*
- 5. What data was required by DOC from the animal ethics committee/s in relation to whether or not 1080 or brodifacoum poisoning was humane and acceptable?*
- 6. Which animal ethics committee/s or advisors have DOC/ZIP relied on to assist in determining whether or not 1080 or brodifacoum was humane and acceptable?*

Regarding questions 1-6 above, DOC uses vertebrate toxic agents (VTAs) that are approved under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) and registered under the Agricultural Compounds and Veterinary Medicines Act 1997 Act (ACVM Act). These substances are used in accordance with the legal conditions and controls set by the Environmental Protection Authority (EPA) and the Ministry for Primary Industries (MPI). Evaluations for the acceptability and control of VTAs are the responsibility

of the EPA and MPI. These assessments are independent of DOC and do not rely on DOC-provided data.

Section 19 of the ACVM Act outlines the risks considered during registration, including animal welfare. MPI hold the details of these evaluations; DOC does not retain this information.

For reference, a comprehensive expert evaluation of the humaneness of pest control tools in New Zealand has been completed, led by the Ministry of Agriculture and Forestry (now MPI). You can access this work here: [How humane are our pest control tools?](#)

DOC complies with the conditions for use of toxins deemed acceptable by the EPA and MPI. While DOC previously conducted its own assessments of animal welfare impacts on a toxin-by-toxin basis, this process was discontinued in 2011, to avoid duplicating the work already undertaken by MPI's ACVM Group.

7. Please provide the full list of toxins used by DOC / ZIP.

The "Status List" document, available [here](#) on the Department of Conservation (DOC) website, categorises vertebrate pesticides and insecticides registered for use in New Zealand, particularly on public conservation land. It outlines whether a pesticide is "Accepted," "Prohibited," or "Not Assessed" for use, along with any restrictions or conditions.

8. Have any animal ethics committee that DOC/ZIP rely on witnessed an animal dying due to 1080 or brodifacoum poisoning.

- *If so - which animal, when, where and how was the toxic administered, who observed?*
- *What occurred to the animal?*
- *What assessment was made?*
- *What was the conclusion arrived at? If the process that the animal underwent was considered humane - why? If not considered humane - why not?*

9. Have any Minister of Conservation including yourself Minister Potaka, Penny Nelson and any Director General of Conservation, any DOC decision-maker - witnessed an animal dying due to 1080 or brodifacoum poisoning?

- *If so - which animal, when, where and how was the toxic administered, who observed?*
- *What occurred to the animal?*
- *What assessment was made?*
- *What was the conclusion arrived at? If the process that the animal underwent was considered humane - why? If not considered humane - why not?*

10. Have you Ben Reddix - witnessed an animal dying due to 1080 or brodifacoum poisoning?

- If so - which animal, when, where and how was the toxic administered, who observed?
- What occurred to the animal?
- What assessment was made?
- What was the conclusion arrived at? If the process that the animal underwent was considered humane - why? If not considered humane - why not?

Regarding question 8-10, this information is refused under section 18(e) of the OIA. This is on the basis that no related information is held.

11. We demand full details of the scope of work to be carried out on the 6 commercial fish species which we are consumers of.

*If the testing has still not been carried out - we want to know when they will be carried out and when the results are available we request full and unabridged details of the results? If the testing has been carried out and results have been supplied by Cawthron- we want full and unabridged details of the results?
Please explain why - if nothing has been done - why?*

ZIP, on behalf of a collaborative project team including DOC, MPI, and representatives from the wild catch and marine farming industries, has engaged Cawthron Institute to undertake scientific trials involving 1080 and sea water. This research is still in its initial phase, with the analytical method now developed. The first series of trials is measuring the diffusion of 1080 from cereal pellets in sea water. The results will be made public once completed. The project team will use these results to inform the next steps for this research stream.

Further to this, you have made several requests regarding additional monitoring – both of water, eDNA, and dust.

Monitoring intended to be undertaken has been outlined in the *Rakiura Notification Factsheet* and the *Update on the delivery of aerial predator control* newsletter provided to you previously.

Additionally, you have requested to meet with DOC and Zero Invasive Predators (ZIP). As outlined in my email to you on 1 September, we remain open and committed to engaging with you. We will be touch in due course to arrange a time that works for both parties.

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

Nāku noa, nā

A handwritten signature in blue ink that reads "Ben Reddiex".

Ben Reddiex
Director National Programmes
Department of Conservation
Te Papa Atawhai