

Application for DOC permission to use VTAs: assessment report

Applicant name:	s 9(2)(a), Operations manager, Motueka Office
Operation name:	Rodent Control, Southern Abel Tasman National Park
Approving manager:	Roy Grose, Director Operations NSI
Assessor:	s 9(2)(a)
Date received:	15/3/2019
Overview:	<p>From section 1.1:</p> <p>In response to the 2019 major beech mast event and anticipated elevated rat numbers, an aerial 1080 operation for rat control is proposed for the southern part of Abel Tasman National Park, in an area from the Inland Track (Castle Rock to Holyoake Clearing) north to the southern reaches of Awaroa Inlet (see map Appendix 2).</p> <p>This pest control will help protect the park's birdlife including South Island robins, bellbirds, tūī, wild and translocated kākā, kākārīki (yellow-crowned parakeet) and whio, as well as recently-released pateke, from attack during their critical spring nesting period, increasing adult and chick survival.</p> <p>Other native fauna recorded in the area that may benefit from the proposed operation include native land snails <i>Powelliphanta hochstetteri hochstetteri</i> and <i>Rhytida o'connori</i> and other invertebrates.</p> <p>This operation is to conform to the existing SOP and guidance for the application of 1080 baits in areas where kea may be present.</p> <p>It is proposed that the following pesticide uses will be applied:</p> <ul style="list-style-type: none"> • Pesticide Use #1, 1080 loaded at 0.15% in 6g RS5 cereal pellets sown aerially, at a rate of 2kg/ha (standard operation). • Pesticide Use #2, 1080 loaded at 0.15% in 6g RS5 cereal pellets hand laid, at rates of 2kg/ha. <p>Preferred timing of the operation is from 29th April (1st prefeed) ending 31 May, 2019.</p> <p>Permission is sought for an operation starting on 29th April 2019 and ending on or before 28th April 2020.</p>

	<p>Location (from section 1.2 and 1.3):</p> <p>Southern Abel Tasman National Park.</p> <p>11,449 Hectares (PHU/DoC consent area)</p> <p>The area to be treated lies in the southern half of Abel Tasman National Park, south of Awaroa Inlet to the Inland track between Canaan, Castle Rocks and Holyoake Clearing.</p> <p>The nearest town is Motueka, 16 km to the south. The coastal village of Marahau is 3km from the southern operational boundary.</p>
<p>Applicant type:</p> <p><i>Delete the incorrect options.</i></p>	<p>DOC applicant—DOC SOPs will apply.</p>

Step 1 Confirm application is complete <i>Are all documents (listed below) provided?</i>	
<p>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 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>The DOC application is completed to a standard that allows assessment.</p> <p>The treatment area will be covered in one block.</p> <p>The AEE section has been completed within the application.</p> <p>The Abel Tasman Project Janszoon Rat and Possum Control AEE 2014 is also referred to in the application which is still relevant (DOC-5879720).</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>Proposed pesticide uses are accepted for use on the Status List:</p> <ul style="list-style-type: none"> • Pesticide Use #1, 1080 loaded at 0.15% in 6g RS5 cereal pellets sown aerially, at a rate of 2kg/ha (standard operation) • Pesticide Use #2, 1080 loaded at 0.15% in 6g RS5 cereal pellets hand laid, at rates of 2kg/ha
<p>Performance standards sheets <i>Is there a performance standard sheet for each pesticide uses proposed, and trapping if applicable?</i></p>	<p>Correct draft PS sheets were supplied by the applicant.</p>

<p>DOC permission map(s) (image file or files)</p> <p><i>Does the map or maps meet the minimum standards (as stated in Appendix 2 of the DOC Application Form), including showing proposed warning sign locations and normal points of entry where warning signs must be A3?</i></p>	<p>An acceptable standard of maps were provided by the applicant.</p>
<p>DOC Pesticide Summary shapefiles (independent groups or individuals only)</p> <p><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>N/A DOC operation – already captured by op planner.</p>
<p>Consultation record including conditions of landowner consents</p> <p><i>Was level of consultation adequate? All required owner/occupier consents obtained? Are conditions of consent evident in their application?</i></p>	<p>Communication record supplied by applicant is comprehensive and being continually updated (see DOC-5879723).</p> <p>Consultation context (from section 3.1):</p> <p>As part of the development and implementation of the Project Janszoon Trust and its activities over the last 7 years extensive consultation has been carried out by DoC and Project Janszoon staff. This has included;</p> <ul style="list-style-type: none"> • Iwi and rūnanga. • Concessionaires and tourism operators. • Local communities and interest groups. • Operational neighbours. • Local government and Public Health. • Local schools. <p>It is within this environment of strong public interaction and information sharing that the proposed Southern Abel Tasman National park aerial operation sits.</p> <p>For the 2019 operation see communication plan for details.</p> <p>LINZ and Tasman District Council consent is not required but they have been informed of the operation.</p>
<p>Public health permission/ proof of application</p> <p><i>Proof of application for public health permission is adequate to process the</i></p>	<p>MOH application and consent supplied by applicant.</p> <p>Public Health Permission:</p>

<p><i>application, as long as the public health permission and associated application form is sighted prior to approval.</i></p>	<p>Ref - 19/02/JCA/NELPH</p>
<p>Other (specify, e.g. RMA consent)</p>	
<p>Your confirmation email and subsequent correspondence <i>Include dates and nature of requests for further information.</i></p>	<p>Contacted applicant (s 9(2)(a) ██████████, DOC Motueka) on 13/3/2019 to confirm application received and processing was underway.</p> <p>Emailed s 9(2)(a) ██████████ and requested the following info on 21/3/2019:</p> <ul style="list-style-type: none"> • An operational plan specific to the 2019 operation • Application for the public health consent • Copy of information Pack/Key Facts sent out as notification <p>Received 2019 op plan and PHU application from s 9(2)(a) ██████████ (contractor) on 21/3/2019.</p> <p>Emailed s 9(2)(a) ██████████ and requested the following on 1/4/2019:</p> <ul style="list-style-type: none"> • The comm plan has a lot of names in it but not too many dates of when/how information has been sent out about the 2019 operation (other than Iwi). If there were there public meetings held or Key Facts sent out the dates and outcomes need to be in there. • Can you send a copy of the Key Facts and any other info used to inform the public or interested parties (s 9(2)(a) ██████████ says DOC/PJ are doing all the comms). I assume it is all the same as what is in the PHU application that s 9(2)(a) ██████████ sent me (see attached)? • Is consent from LINZ or TDC required for the non PCL areas (if so can you send a copy) • Has there been any opposition or negative feedback about the operation from anyone thus far? This also needs detailed in the comm plan. • Is there a compliance register underway for the operation? • s 9(2)(a) ██████████ also sent through a draft operational plan, is that now the approved and finalised version or still a work in progress? <p>Received reply from s 9(2)(a) ██████████ on 3/4/2019:</p> <ul style="list-style-type: none"> • Please find Key Facts attached. This will be sent

	<p>to parties listed in comms plan with relevant accompanying letter on 15 April.</p> <ul style="list-style-type: none"> • No consent from LINZ or TDC required for this operation • No opposition or negative feedback so far, and not too much anticipated. This may change when the Key Facts and letters are received. Negative feedback will be captured in the comms plan. • No compliance register currently underway. I'll begin one today • I'm not sure if the ops plan has progressed since the last draft. <p>s 9(2)(a) – Anything to add to my responses, particularly in relation to the last point.</p>
<p>Step 2 Capture treatment blocks in the Pesticide Application</p>	
<p>Your publication of the proposed operation on the DOC Pesticide Summary (independent groups or individuals only) <i>Include date and note any issues.</i></p>	<p>N/A DOC operation – already captured.</p>
<p>Step 3 Evaluate control method <i>Is the proposed method suited to the pest problem, treatment area and consultation outcomes?</i></p>	
<p>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>	<p>The aerial application of 1080 cereal pellets has proven to be very effective in reducing rat numbers over large area when utilised by experienced operators using currently accepted best practice methods. This method is suitable for the proposed control area (10,978 ha) and has been successfully used in the past in this area.</p> <p>Proposed methods comply with best practice for rat control and standards 1 – 3 of the DOC Code of Practice for aerial 1080 in kea habitat</p> <ul style="list-style-type: none"> • One Prefeed 2.0kg/ha (+/- 10%) with 10% swath overlap • Toxic 2.0kg/ha (+/-10%) with 10% swath overlap <p>A 10% swath overlap should ensure sufficient coverage to achieve a high rat kill.</p> <p>Hand-laid 1080 will be used as required to treat</p>

	<p>exclusion area buffers.</p> <p>The proposed method should achieve the targets stated in section 2.2:</p> <p>Specifically for this operation;</p> <ul style="list-style-type: none"> • Rats are controlled to <2% TTI immediately following a control operation • Below 600m altitude, rats remain <30% TTI, six months after treatment • Above 600m altitude, rats remain <10% TTI, six months after treatment <p>Section 4 of the application describes the proposed control methods and adequately justifies their use for this operation:</p> <p>This operation is part of an on-going multi-year large-scale possum and rat control programme funded by the private restorat on initiative Project Janszoon.</p> <p>This landscape-scale rodent control will augment and support intensive ground-based predator control at several high priority multi-pest management sites undertaken by Project Janszoon and DoC.</p> <p>Aerially applied 1080 laced cereal bait is the only cost effective method of rat control in this area. This rationale has been fully explored in the AEE supplied in support of this work.</p>
<p>Label directions</p> <p><i>Check the product label to ensure that the proposed method detail complies with the label content</i></p>	<p>The methods comply with label directions.</p>
<p>Summary of any technical advice received on the proposed control methods.</p>	<p>Nil – proven method for rodent control in this type of terrain.</p>
<p>Summary of any Community relations and Pou Tairangahau advice received.</p>	<p>Nil – applicant has contacted local Iwi re the operation and received no negative feedback to date.</p>
<p>Step 4 Identify and assess risks and adverse effects <i>Are you satisfied that all risks and adverse effects have been identified?</i></p>	
<p>Are there any gaps in the applicant’s assessment of these (where the AEE</p>	<p>No gaps identified– AEE comprehensive and refers to the Abel Tasman Project Janszoon Rat and</p>

section was supplied)?	Possum Control AEE 2014 which is still relevant.
Relevant points from the DOC Pesticide Information Reviews	<p>There is potential for some individual native bird species to be poisoned in the operational area however, the risk at a population level is considered low. The benefit of effective pest control and subsequent protection of the native flora and fauna present in the area will outweigh this risk.</p> <p>1080 Review Fairweather, A.A.C.; Broome, K.G.; Fisher, P. 2018: Sodium Fluoroacetate Pesticide Information Review. Version 2018/2. Unpublished report docdm-25427, Department of Conservation, Hamilton, NZ. 113p.</p> <p><i>There have been numerous studies examining the effects of aerial poisoning on native non-target populations over the last 20 years. 21 species of native birds, particularly threatened species, have been monitored. None of the studies have identified population level mortality which threatened the viability of the species, although the only reliably calculated mortality rates are for kokako, kiwi, kaka, whio and fernbirds.</i></p> <p><i>In extreme cold and drought, 1080 residues could persist in baits for several months.</i></p> <p><i>There is wide variation between species in their susceptibility to 1080 poisoning. Dogs are especially vulnerable and highly likely to die if they eat 1080 baits or scavenge animals killed by 1080.</i></p> <p><i>1080 is considered to have medium humaneness for possums, however there has been little formal research into the humaneness of 1080 on other target species. Most deaths of pest species occur 8 – 48 hours after ingestion of a lethal dose. The majority of pest control operations using 1080 have target pest kills of greater than 80%.</i></p>
Summary of any technical or community relations advice received	
Other resources consulted (<i>specify</i>)	<p>Current Agreed Best Practice – Possum Control – Aerial Application of 1080 Cereal Pellets docdm-341728</p> <p>Method Best practice for Battle for our</p>

	<p>Birds Aerial 1080 baiting Version 1.5 July 2018</p> <p>Kea survival during aerial poisoning for rat and possum control. Joshua R Kemp, Corey C Mosen, Graeme P Elliott, Christine M Hunter and Paul van Klink, June 05, 2018</p>
<p>Your assessment of technical risks and adverse effects (e.g. the pesticide use, use pattern, site factors)</p>	<p>Proposed methods comply with Current Agreed Best Practice and are suitable for the site.</p> <p>Risk to non-target species is considered low and all native plant and animal species will be advantaged by a reduction in rodent numbers (and the associated by-kill of stoats and possums).</p> <p>Kea are present in the proposed operational area however risk is considered low as they are not habituated to interacting with people or foreign food items and the operation is not near a 'scrounging site'.</p> <p>Risk to kea is covered in the 2013 DOC/Project Janszoon Possum-Rat Control AEE (DOC-5879720) which is still relevant.</p> <p>From the Operational Plan:</p> <p>Internal risks are limited to minimising the gaps between swaths. The intended swath overlap of 10% (5% each side or c. +/-8m) should cover this but accurate flying by the pilots is necessary.</p> <p>External risks are the boundary against 2 adjacent private land blocks (along the western Wainui/Evans Range portion, and the adjoining excluded water supply catchments and the Coast track along the eastern coastal portion. These risk areas have had a safety buffer applied to prevent any accidental discharge into those areas.</p>
<p>Your assessment of non-technical risks (e.g. high public use, consultation outcomes)</p>	<p>Consultation record shows the operation has no negative feedback from notified parties to date. ?</p> <p>The loading site is located within ATNP (the flight corridor crosses over the access road to Totaranui). The road under the flight path will be inspected to ensure no bait has accidentally fallen from buckets.</p> <p>Dogs are not permitted in the operational area.</p>

	<p>From section 1.7 and 1.8:</p> <p>There are several DoC tracks in the treatment area, along with 6 huts/shelters and 3 campsites included or immediately adjacent - refer to accompanying maps. As the operation is to be conducted over the late autumn/early winter period, visitor use should be low.</p> <p>PHU consent conditions address potential risk to human health.</p>
<p>Step 5 Calculate estimated caution period and evaluate if risks and adverse effects are at an acceptable level <i>Will risks be managed adequately with the performance standards proposed for this operation? Include dates and outcomes of any discussion with the applicant.</i></p>	
<p>Estimated caution period for all the pesticide use(s) <i>Does this differ from the recommended caution period in the Caution period calculator?</i></p>	<p>Pesticide Use #1 and #2 - Caution periods set at 8 months after bait application as recommended in the CP calculator (dry site 'No' (>600mm rainfall pa) and mean temp in the 6 months following the operation <10 degrees 'No'), bait and carcass monitoring is required for 1080 aerial pellets.</p>
<p>How well does the proposed operation manage potential risks to native fauna? <i>(i.e. as proposed in the Application form or performance standards)</i></p>	<p>Proposed control methods and performance standards are adequate to manage risk to native fauna.</p> <p>The AEE covers risk mitigation for kea, kaka, whio, pāteke and fur seal that may be present in the control area.</p>
<p>How well are other potential risks managed? <i>(i.e. as proposed in the Application form or performance standards)</i></p>	<p>Applicant is experienced with this methodology and local environment so potential risks are well managed. The contractor has an internal process for readiness checking their operations including a consents register, progress checklist and task allocation.</p> <p>The DOC compliance register also records that all necessary planning and operational tasks have been done.</p> <p>Public Health Consent contains conditions to mitigate risk to human health.</p> <p>Public notices, the DOC pesticide summary and warning signs will inform the public of the operation.</p>
<p>Are you satisfied with the proposed warning sign locations and normal points of entry?</p>	<p>Operational maps with all warning signs marked have been supplied and are adequate.</p>
<p>Summary of any technical or community relations advice received</p>	<p>§ 9(2)(a) [REDACTED], DOC Motueka consulted re appropriate warning sign locations.</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>	PHU application and consent supplied by applicant. PHU consent contains conditions which must be adhered to relating to bait exclusion zones, alternative water supplies, track clearances, school holiday dates, public notices.
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>	Nil – standard conditions are sufficient.
Step 6 Make a recommendation Should the application be approved or declined?	
What key points should the approving manager have drawn to their attention?	The operation, through a reduction in rodent numbers (and by-kill of stoat and possum) should achieve the desired result. Consultation record shows a generally good level of support for the operation to date.
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>	Approval recommended
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>	Attached: <ul style="list-style-type: none"> • Letter incl maps (DOC-5900357) PS sheets <ul style="list-style-type: none"> • PU#1 (DOC-5900189) • PU#2 (DOC-5900226)
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</i>	

example, where the manager decides on different operational timing or warning sign locations or rejects a recommendation to approve or decline the application.

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.

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