

Application for DOC permission to use VTAs: assessment report

Applicant name:	s 9(2)(a) [redacted] Contract Wild Animal Control New Zealand
Operation name:	Predator Control in the Wet Jacket Operational Area, Tiakina Nga Manu/Battle for our Birds May 2019
Approving manager:	Aaron Fleming, Director Operations, Southern South Island
Assessor:	s 9(2)(a), 9(2)(g)(ii) [redacted]
Date received:	29 March 2019
Overview:	<p>It is proposed that the following pesticide uses will be applied:</p> <ul style="list-style-type: none"> • Pesticide Use #1 - sodium fluoroacetate 1.5g/kg cereal pellet aerial • Pesticide Use #2 - sodium fluoroacetate 1.5g/kg cereal pellet hand-laid <p>Permission is sought for toxic application starting on or after 1 May 2019 and ending on or before 30 April 2020.</p> <p>Non-toxic prefeed will be applied no earlier than 1 May 2019.</p> <p>Primary method to be employed is aerial 1080 with hand laid 1080 to be used within buffer areas as required.</p> <p>The Treatment Area is the Wetjacket Treatment Area – 40 000ha, being part of Fiordland National Park (The proposed PHU consent area is 149 029ha).</p>
Applicant type: <i>Delete the incorrect options.</i>	DOC SOPs will apply.

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</i></p>	<p>The application as provided has been completed to a standard that allows for assessment. All sections of the application form have been completed, including the AEE section.</p> <p>There is one treatment block, so the application meets the grouping standard.</p>

completed?	
<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>Yes. Pesticide uses #1 and #2 are accepted for use on the DOC status list.</p>
<p>Performance standards sheets <i>Is there a performance standard sheet for each pesticide uses proposed, and trapping if applicable?</i></p>	<p>Performance standards sheets for Pesticide use #1 and #2 are included in the application.</p>
<p>DOC permission map(s) (image file or files) <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>The map provided meets the required standards in Appendix 2 of the DOC application form. It is assumed that all warning signs indicated are normal points of entry and so will be A3 size as required by the SOP.</p>
<p>DOC Pesticide Summary shapefiles (independent groups or individuals only) <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>NA</p>
<p>Consultation record including conditions of landowner consents <i>Was level of consultation adequate? All required owner/occupier consents obtained? Are conditions of consent evident in their application?</i></p>	<p>There are 2 Communications Plans – one specific to this operation and another involving this and other Fiordland sites. The wider comms plan has identified parties for consultation but as yet there is no evidence of consultation. The Wetjacket Communications Plan identifies parties to consult, with some overlap between the plans. This plan gives evidence of the Site Lead having completed initial consultation. The contractor for this operation is responsible for completion of the consultation and updating of the Communications Plan.</p> <p>The DOC Application (p8) states that information on this operation has been provided to all interested runanga, but there is no evidence of this in the Comms Plan.</p> <p>A key fact sheet is ready to use for consultation.</p>
Public health permission/ proof of	A copy of the application for public health

<p>application <i>Proof of application for public health permission is adequate to process the application, as long as the public health permission and associated application form is sighted prior to approval.</i></p>	<p>permission has been sighted.</p>
<p>Other (specify, e.g. RMA consent)</p>	<p>NA</p>
<p>Your confirmation email and subsequent correspondence <i>Include dates and nature of requests for further information.</i></p>	<p>The DOC Permission Application was received on 29/3/2019, and an acknowledgement email of receipt of application was sent the same day.</p> <p>On 4 April I requested the compliance register, home page, and task allocation list from the operational contract. These were received.</p> <p>On 5 April I requested and update of the methods section of the Application to include Pesticide Use #2. This was received on 6 April.</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>To be completed by the Site Lead.</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 Operational Plan says that stoats are the principal target of this operation, with outcomes focused around kiwi, but this is not reflected in the DOC Application.</p> <p>The proposed control method is the only method suitable for controlling rats, possums and stoats over such a large, remote and rugged landscape. The large size with coastal boundaries will also greatly reduce the re-invasion rate of these pests.</p> <p>The operation is timed for a predicted beech mast, when it is expected that rodent numbers will increase. Rodents will need to rise to a level which will enable a secondary kill of stoats.</p> <p>The method follows the code of practice for aerial 1080 in kea habitat in terms of bait type and sowing rates. According to this code, if the operation happens between 1 May and 30 June the average tracking index for rodents must be at least 10%, unless an exemption is given. An exemption</p>

	decision would be made by the approving manager, based on a recommendation from a technical advisor (threats), which would consider specialist advice.
Label directions <i>Check the product label to ensure that the proposed method detail complies with the label content.</i>	The proposed method complies with the product label.
Summary of any technical advice received on the proposed control methods.	s 9(2)(a), 9(2)(g)(ii) (site lead) confirmed that, regarding following the code of practice for aerial 1080 in kea habitat, and to maximise the potential for stoat secondary poisoning: <ul style="list-style-type: none"> - rodents are being monitored in (Feb, May, Aug and Nov, as standard) - we are aware that we will need a trigger level - we have sought advice from the BFOB TAG through s 9(2)(a), 9(2)(g) as to what that trigger level should be. The interim advice was 10% rodent tracking averaged across the block, but we are hoping to receive more formal written guidance shortly.
Summary of any Community relations and Pou Tairangahau advice received.	NA
Step 4 Identify and assess risks and adverse effects <i>Are you satisfied that all risks and adverse effects have been identified?</i>	
Are there any gaps in the applicant's assessment of these (where the AEE section was supplied)?	No
Relevant points from the DOC Pesticide Information Reviews	<p><i>1080 Review Fairweather, AAC; Broome, KG; Fischer, P. 2018: Sodium Fluoroacetate Pesticide Information Review. Version 2018/6. Unpublished report DOCDM-25427, DOC, Hamilton, NZ</i></p> <p>1080 is likely to be toxic to most native animals, and the small size of many native species (relative to the target pests) means that toxic baits used for pest control are capable of causing harm to almost any animal that eats the bait. However, the Vertebrate Residue database between 1994-2018 recorded only 44 poisoned individuals representing 11 native species across all bait types used in aerial and handlaid operations.</p> <p>There have been numerous studies examining the effects of aerial poisoning on native non-target populations over the last 20 years. 24 species of native birds, particularly threatened species, have</p>

	<p>been monitored. None of the studies have identified population level mortality which threatened the viability of the species.</p> <p>Invertebrate populations have been monitored in nine aerial poisoning operations and none have shown significant population effects on any species studied, nor is there evidence to suggest poisoned invertebrates are a significant factor in secondary poisoning of other animals.</p> <p>The risks 1080 operations pose to aquatic species is considered very low. Fish are very tolerant to 1080. Additionally, 1080 contamination of water is rarely found during 1080 operations and is at an extremely low level when it has occurred.</p> <p>A total of 222 radio tagged Kea have been exposed to aerial or hand laying operations using 0.15% or 0.08% 1080 Pellets over 19 operations and 24 have died from poisoning.</p>
<p>Summary of any technical or community relations advice received</p>	<p>s 9(2)(a), 9(2)(g)(ii) provided minutes of a meeting with Technical Advisors on this operation, where timing, operational area and risk to kea were discussed. This advice has been incorporated into the Operational Plan, and kea are being monitored for mortality through this operation to test their vulnerability in remote, first time operations.</p>
<p>Other resources consulted (<i>specify</i>)</p>	<p><i>Method Best Practice for BFOB Aerial 1080 baiting:</i> This operation follows this best practice as far as can be assessed. The Site Lead and Project Manager should be familiar and compliant with this document to reduce the risk of not meeting operational target.</p> <p><i>Code of Practice for aerial 1080 in kea habitat:</i> this has been complied with, though (as noted above) rodents will need monitoring to assess when they are at a level which will effectively kill stoats.</p> <p><i>Task list from Operational contract (DOC-5563633):</i> clearly outlines who (contractor or DOC) is responsible for each task.</p> <p>Operational Plan (DOC-5592692) – this is incomplete and appears to have not been updated following the peer review due to the delivery of the operation being undertaken by a contractor. Ideally this plan should be tidied so that it is clear</p>

	<p>from the plan which aspects of the operation will be covered by the contractor.</p>
<p>Your assessment of technical risks and adverse effects (e.g. the pesticide use, use pattern, site factors)</p>	<p><i>Risk to kea:</i> there is some risk to kea, which should be minimised by following the Code of Practice. There is also an unknown risk to kea from 1st time aerial 1080 operations. BFOB research funding has been applied for to follow radio-tagged kea through this operation to resolve this question. If stoats are effectively controlled through this operation kea will benefit from reduced predation at nests.</p> <p><i>Risk of remote location with unsettled weather:</i> as such this operation has added complexity. Because of this the block has been split into 3 prioritised blocks.</p> <p><i>Risk that rats numbers do not increase to a level which would guarantee a good stoat kill:</i> The BfoB TAG group is being contacted by the site lead for advice around this.</p>
<p>Your assessment of non-technical risks (e.g. high public use, consultation outcomes)</p>	<p>The groups identified for consultation looks comprehensive, though I am unable to assess what consultation has taken place. An email from the contractor (CWAC) to the Site Lead on 11 April confirms that consultation is largely complete.</p> <p><i>Changing site lead:</i> Changing site leads for this operation creates opportunity for things to be missed during handover.</p> <p><i>The large number of proposed aerial operations in 2019:</i> this will put pressure on the timing of operations and pressure on resources.</p>
<p>Step 5 Calculate estimated caution period and evaluate if risks and adverse effects are at an acceptable level Will risks be managed adequately with the performance standards proposed for this operation? Include dates and outcomes of any discussion with the applicant.</p>	
<p>Estimated caution period for all the pesticide use(s) Does this differ from the recommended caution period in the Caution period calculator?</p>	<p>PU#1 and PU#2 – Caution periods set at 9 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 'Yes', bait and carcass monitoring is required for 1080 aerial and hand laid pellets</p>
<p>How well does the proposed operation manage potential risks to native fauna? (i.e. as proposed in the Application form or performance standards)</p>	<p>The proposed control methods and performance standards are adequate to manage risk to native fauna.</p>

	The AEE section of the application is comprehensive. The risk to kea will be managed by adhering to the DOC code of practice for aerial 1080 in kea habitat, and will be further quantified by monitoring radio tracked kea through this operation.
How well are other potential risks managed? <i>(i.e. as proposed in the Application form or performance standards)</i>	<p>Because of the isolation of this site there is no risk to domestic animals in the operational area. However there is a back-up loading site located on private land ^{s 6(d), 9(2)(g)(ii)} [REDACTED]. There is evidence of initial consultation with the landowner in the Communications Plan. It is recommended that a written consent is obtained, with any conditions included.</p> <p>Dogs are not permitted in the National Park without a permit, and no permit will be issued for any part of the treatment area, so risk to dogs is minimal except around the alternative loading site, if used.</p> <p>From the operational map there is a water intake at Sunday Cove which is not referred to under 'Drinking Water Supplies' section of the PHU application. It is expected the PHU will pick this up on the PHU Application which has been submitted to them.</p>
Are you satisfied with the proposed warning sign locations and normal points of entry?	Yes, there are signs at the only walking track into the area and at Supper Cover Hut (in the operational area) and at Loch Maree Hut on the track leading to Supper Cover.
Summary of any technical or community relations advice received	NA
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>	Public health application has been supplied by the applicant.
Other resources consulted <i>(specify)</i>	NA
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>	I suggest an additional compulsory Performance Standard for PU#1 is to follow the Method Best practice for Battle for our Birds Aerial 1080 baiting DOC-2749355. This best practice draws on the existing Current Agreed Best Practice System and from lessons learned from previous BfoB operations.
Step 6 Make a recommendation <i>Should the application be approved or declined?</i>	

<p>What key points should the approving manager have drawn to their attention?</p>	<p>This operation will benefit Southern Fiordland tokoeka, and provide learnings for an adaptive management programme for this species. Other native species will also benefit from reduced predation and browse. The operation will benefit from having sea boundaries, resulting in a slower rate of re-invasion from the surrounding area.</p> <p>The remoteness, the unpredictable weather and having a number of other operations occurring in 2019 will all put pressure on this operation, so good communication between the Site Lead (and other relevant local DOC staff), BfoB Operations Lead, and Operational Contractors will be essential, alongside a clear organisational structure.</p> <p>The communications plan, compliance register and task list requires continual updating (for which there is currently no evidence). This is the responsibility of the contractors/applicant (as per the Task Specifications of the contract). The DOC site lead needs to ensure these documents are comprehensive and correctly updated by the contractor.</p> <p>The permission for this operation can be approved (signed) but a readiness check needs to be completed before the operation occurs.</p> <p>Other areas of potential concern are highlighted in blue within this assessment.</p>
<p>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></p>	<p>Approval recommended.</p>
<p>Step 7 Prepare documents and advise manager</p>	
<p>For recommended approval: <i>Attached correct draft letter of permission, DOC Performance Standards sheet(s) and map(s) of operational boundaries.</i></p>	<p>DOC-5909386 (permission letter including performance standards sheets and maps)</p>
<p>For recommended decline: <i>Attach draft letter of decline including a summary of reasons.</i></p>	

Record of permission decisions that differ from the assessor recommendation	
<p>Record of permission decision <i>Only complete this section where the manager has made a decision that differs from the assessor's recommendation. For example, where the manager decides on different operational timing or warning sign locations or rejects a recommendation to approve or decline the application.</i> <i>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.</i></p>	

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