

Proposed Submission from the Greater Wellington Regional Council to the Applicant Group

1. The Greater Wellington Regional Council supports the Applicant Group's initiative to seek reassessment of 1080 through the ERMA process. This will provide the public with an opportunity to submit their concerns or support and be confident that an independent body will consider all issues before determining whether future use is appropriate and, if so, what conditions and or controls should apply.

The reassessment process will also provide an opportunity for the Applicant Group to submit all known scientific data about 1080. To date, many opponents of 1080 have raised issues based on insufficient knowledge. The application process will help alleviate this problem. Greater Wellington is well aware, however, that many people will continue to oppose 1080 despite the wealth of information now available. Consultation with these individuals and groups will therefore be an ongoing requirement.

2. Greater Wellington strongly supports the continued availability of the pesticide 1080 for use as a vertebrate pest control tool in New Zealand. The benefits achieved by the use of 1080, particularly over the last 15 years, are enormous. There has been tremendous success in meeting interim objectives of the National Bovine Tb Pest Management Strategy. Furthermore, New Zealand has achieved significant conservation gains, both on Department of Conservation estate and private land. Through the use of 1080 for the control of possums and rabbits, and the associated by-kill of rats and mustelids, the Tb disease status and ecological health of New Zealand has substantially improved. As a country, we must maintain this momentum. Losing 1080 or operating under a rigidly controlled system will cause a steady decline in the gains made to date.
3. The prosperity of New Zealand continued to rely on producing top quality, disease free primary produce, and marketing ourselves as an ecological paradise where significant gains have already been made in restoring and enhancing our biodiversity. Intensive pest management is critical to maintain these outcomes. Prioritising our limited budgets to maximise these outcomes is already a significant challenge. Attempting to make further progress without access to 1080 would be extremely difficult.
4. In 1994, the Wellington region had 331 Tb infected cattle and deer herds. These herds were dispersed throughout the region, occupying a range of landscapes from valley flats to steep, regenerating hill country. Possum densities were very high, particularly in the hill country. 1080 paste was the tool of choice in the hill country areas where access was available. 1080 aerial application occurred in areas of rugged terrain where accessibility was limited. Overall, 1080 was an extremely successful tool in the mid to late 1990s. Tb infected herds have

reduced on the back of this success to total only 21 in June 2004. The regional commitment to this programme has been significant. The regional community has invested approximately \$12M over the past 10 years and, in doing so, have generally supported the use of 1080, when required.

5. Greater Wellington has also been a strong advocate for protecting and enhancing regional biodiversity. The Council's Key Native Ecosystem programme and recent possum control programmes on Council Parks and urban water supply catchments have been very successful because of the use of 1080. This tool has been extremely valuable in providing a rapid reduction in possum numbers and a useful by-kill of rodents and mustelids. There has been considerable improvement in native bird populations and forest floor regeneration. Critical water supply catchments have been protected from the ravages of pests and their potential adverse impacts on water quality.
6. 1080 is one of a number of tools available for pest control in New Zealand. There is a perception that it is used extensively throughout New Zealand on a constant basis. This is inaccurate. In the Wellington region less than 10-15% of the current Tb vector control programme comprises aerial or ground application of 1080 baits. The predominant control methods are trapping and cyanide in bait stations.
7. Greater Wellington has recognised that aerial application methods are concerning to some parts of the community. We have, therefore, pioneered the development of low application rates, and the use of pre-operational monitoring to clearly determine that control is warranted. Our data indicates that aerial 1080 applications are only required every 3-4 years if professional control operators are utilised. Application rates have been reduced to as low as 1-2 kg of bait per hectare compared to 10 kg per hectare some years ago.

There have also been significant gains over the past five years in technological improvements associated with aerial bait application. One of the first major advances was the use of differential global positioning systems to provide real time accurate navigational guidance for bait application. The development of calibrated under-slung buckets for accurate delivery of bait, in a manner that provided reliable bait flow and consistent swathe width, followed. Bait quality has improved markedly over the past 10 years. The refinement of cereal pellet production has led to the availability of a range of options in toxic loadings, lure type and size. Consistency in quality criteria has led to negligible losses of desirable non-target species.

8. Greater Wellington acknowledges that there are some adverse impacts associated with the use of 1080. The main issue is the potential risk to dogs. The development of a 1080 antidote should be a high research priority. The other major risk is to the health of applicators. Stringent training requirements

and the use of audited operating procedures in recent years has minimised this risk. The risk to non-target native birds has been minimised by advancements in bait production and quality. Water supplies are not at risk from contamination as long as competent operators are used and approved operating procedures practiced. Water sampling over the past 15 years has proven conclusively that any measurable concentration of 1080 in water is extremely rare. The risk of long term, low level exposure to 1080 through water supply contamination is not a possibility.

- 9.** Greater Wellington supports the continued use of the Resource Management Act process in relation to aerial applications of 1080. However, the Council believes that the impacts are such that a non-notified process remains appropriate. The Council also supports the ongoing use of the Medical Officer of Health to approve aerial 1080 applications. This independent authority provides surety to the public that community health concerns will continue to be addressed.
- 10.** In conclusion, Greater Wellington strongly supports the retention of 1080 as a vertebrate pest control poison in New Zealand. This tool has, and will continue to provide significant environmental and economic benefits to this country. The Council urges ERMA to consider the intergenerational benefits that 1080 provides. New Zealand is a unique nation with a unique set of pest problems. Using overseas precedents for regulatory control are not appropriate. The consequences of either tighter controls or, in the worst case, loss of access to 1080, must be considered very carefully.