

RESPONSE TO 2018 TBFREE PROGRAMME PEST CONTROL CONSULTATION

NOVEMBER 2017

This document outlines OSPRI's response to the key points raised by submissions on the 2018 national plan for TBfree pest control operations

BACKGROUND

In November 2016 OSPRI published a consultation document outlining its proposed aerial and ground-based pest control operations for 2017 to support the National Bovine Tuberculosis Pest Management Plan (the TBfree programme). As a result of the number and quality of submissions received and feedback from stakeholders welcoming the opportunity to comment on proposed operations, this consultation process has now been established as an annual engagement activity to support the delivery of the TBfree programme.

In July 2017 OSPRI accordingly published its second national consultation document outlining proposed aerial and ground-based pest control operations for 2018. Consultation is scheduled to ensure feedback can be addressed and if appropriate incorporated into operational plans for the year ahead. The consultation period ran through to Friday 29 September, 2017. The document was distributed to key OSPRI stakeholders, industry and community groups and promoted online and through social media throughout the consultation period. Submissions were received from a wide range of interested parties, including landowners, farmers, tourism companies, hunters and recreational land users.

SUMMARY OF SUBMISSIONS

In total, 70 submissions were received through the national consultation process facilitated by OSPRI. A number of these submissions expressed strong support for the TB programme and the rationale behind the proposed pest control work directed at TB eradication in the wildlife population. There was also recognition from key stakeholder interest groups, specifically the hunting community that our engagement process and approach to consultation has significantly improved, with earlier release of the national consultation document and the creation of Tuberculosis Management Area (TMA) notices and associated eradication targets.

Queries, information needs and concerns about the impact of the operations and the methods used to control TB were presented in some submissions alongside expressions of interest in receiving further detail concerning some operations, timelines for eradication, methods for pest control and the application of aerial and ground based pest management approaches. These concerns primarily related to:

1. The use of 1080 for pest control.
2. The impact of operations on hunting and outdoor recreation.
3. Providing evidence of TB.
4. Requests for greater use of deer repellent in aerial 1080 baiting operations.
5. The consultation process for aerial operations.
6. The impact of aerial 1080 baiting operations on water supplies.

Several anonymous submissions were also provided to OSPRI outlining opposition to the use of 1080. Some of these submissions were considered to be aggressive and in some cases, threats were made in relation to the safety and wellbeing of OSPRI staff.

The following section seeks to address the primary concerns in more detail.

RESPONSE TO KEY CONCERNS

1. The use of 1080 for pest control

The use of sodium fluoroacetate (1080) is vital in controlling possums, the main wildlife carriers of bovine TB that infect cattle and deer. While acknowledging some people's opposition to its use, it is important to understand there are strict consent, communication, notification, health and safety, quality assurance and monitoring requirements that OSPRI and other agencies or organisations are required to adhere to in regard to the use of 1080, when applied either by ground or aerial methods.

It is also important to note that hand-laid traps, toxins and ground surveillance comprise approximately 90 per cent of OSPRI's pest management work. Just 10 per cent of control by area is carried out using aerially applied 1080).

As well as reducing the risk of TB in cattle and deer herds, there are significant positive biodiversity benefits demonstrated from using 1080. These are highlighted in the Parliamentary Commissioner for the Environment's report on the use of 1080 released in 2011, and in a range of studies and post-operational monitoring reports published by the Department of Conservation. Every year, introduced pest species kill and threaten the habitats of millions of native birds and destroy native bush. Many of New Zealand's native species struggle to survive in the wild. Without the use of 1080 to control possums and other predators including rats and stoats, birds such as kiwi, whio and mohua, among many others, will disappear from mainland New Zealand.

For further information about the TBfree programme and our pest control work – including how we safely manage the use of 1080, how we determine whether 1080 is the optimal choice for various pest operations, and how we manage risks – please explore our library of factsheets at www.ospri.co.nz/Publications/Factsheets.aspx

2. The impact of operations on hunting and outdoor recreation areas

A number of submissions noted that planned aerial 1080 operations in the central North Island have the potential to affect sika deer populations and hunting opportunities. There was concern raised by submitters that 1080 operations may greatly reduce hunting opportunities if the period of treatment is aligned with the hunting season. Submitters highlighted that the timing of OSPRI operations in some areas, if coinciding with snowy weather conditions, may reduce available hunting areas and cause overcrowding of hunters.

To address these concerns, where possible OSPRI will seek to split or segregate our operations over different areas and timings, to allow recreational hunting to continue in at least some areas at any time. We will continue to work closely with hunting associations and meet with local branches of affected deerstalkers to receive feedback and input to the programme to minimise possible impacts, as well as provide advanced notification of proposed operations to enable the community to respond in terms of their proposed seasonal recreational activities and timing.

The programme is designed to ensure effective early progress toward TB eradication within timeframes and available funding. The formal progress objectives of the TB Plan require TB freedom in possums to be achieved by 2040, but available operational funding is expected to fall sharply after 2030, so maximum progress is needed as soon as possible. Operations in 2017 have been planned to minimise periods of toxin use in key areas so as to complete the required operations in a timely manner. The extent of operations and the impact on hunting will fall away over time as TB eradication is achieved. In some cases, as a result of feedback, we have adjusted the extent and timing of some operations to enable hunting to continue.

3. Providing evidence of TB

A number of submissions have called for more detailed information on and evidence for wildlife TB infection within or near operational areas, and greater use of wildlife surveys to confirm such information prior to implementing control operations. To address this, OSPRI has defined a new approach to the TB programme, where wildlife pest management is delivered through a framework of more than 100 Tuberculosis Management Areas (TMAs). These TMAs are defined regions and areas with characteristic disease patterns, geographical features, control history, and future control needs. This enables possum control and other wildlife management and disease surveys to be planned and procured in a more efficient and transparent manner. Division of the programme into TMAs also provides for targeted local information on proposed operations and timelines for TB eradication targets to be provided to the community.

Each TMA plan will be reviewed annually, and each year OSPRI will publish a notice for each TMA, which will describe at local level any possum control or wildlife survey work planned for the coming year, as well as providing a forward view of further work that will be required to achieve TB eradication. Each notice will also provide the area's history of TB in livestock and in wildlife, both in relation to infected herds and TB infected wildlife. Each notice is distributed to local landowners and interested parties, and is readily available online or by request. For further details about TMA notices see www.tbfree.org.nz/tb-management-areas.aspx

Operations are targeted at areas with known TB in wildlife, or strong likelihood of TB based on extrapolated scientific assessments and analyses of wildlife populations and disease history. Scientific assessment and historical data concerning TB prevalence in herds and wildlife populations, coupled with population density data and anticipated rates of disease spread in wildlife, inform OSPRI's determination of predicted TB prevalence and potential spread. Possum control is maintained and repeated to key population target levels until the surveillance and control results, as well as examination of disease indicators in the area, can provide a high level of confidence that TB has been eradicated.

Definitive recent findings of TB in wildlife should not be to be a pre-requisite for possum control operations, especially given that surveys to reliably detect wildlife TB at low levels may in fact be more costly than possum control itself.

4. Requests for greater use of deer repellent in aerial 1080 baiting operations.

In response to requests by submitters for greater use of deer repellent on 1080 bait, OSPRI will consider its application on a case-by-case basis in areas of high deer hunting interest and value. Decisions take into account factors such as wildlife population assessment, operational risk assessment, likelihood of success in terms of deer repellent application and cost benefit. The additional 20 to 30 per cent operational cost involved with using deer repellent can, in some areas, provide a barrier to the cost-effective eradication of TB, depending on the nature and size of the population of wildlife in the particular area, and the timing and quantum of operations to achieve TB eradication. OSPRI is continually examining alternatives to current baiting and associated impacts on some wildlife species, as well as exploring new and innovative baiting materials and methods that will hopefully result in lower future costs and less impact on non-target species. Wild deer are not targeted in the TB programme but the cost of protecting deer by using repellent is met by the TB programme.

Deer repellent is applied in specific areas and operations for the benefit of recreational hunters, landowners and businesses. OSPRI is committed to working with hunting organisations, through consultation, to prioritise areas for deer repellent use, to enable best use of this resource.

5. The consultation process for aerial operations

Some submissions raised concerns about the timing and thoroughness of the consultation and landowner notification processes for the proposed pest control operations. The development of the national consultation and associated TMA notices for each region is part of OSPRI's response to these concerns. It should be noted that OSPRI has already received positive feedback that these engagement mechanisms are already generating greater transparency and targeted information for landowners. It is important to note that OSPRI is committed to listening and accommodating a wide range of views through genuine public consultation processes relating to our operations.

For all proposed operations, OSPRI aims to ensure that communities, land occupiers and land users are notified well in advance and have the opportunity to submit feedback about any possible risks or sensitive areas that need to be managed. OSPRI has also demonstrated a willingness to amend operational timelines, change methods and approach or make other adjustments to address concerns expressed during consultation feedback – there are several examples of this from the past two years of the TB programme. This includes sharing plans with:

- Landowners/occupiers who may be directly affected by operations
- Farmers, growers and primary sector businesses
- Businesses operating in outdoor or forest environments
- Iwi groups and trusts
- Hunting and outdoor recreation groups
- Department of Conservation
- Regional and local government
- District public health units and Medical Officers of Health
- Conservation groups

- Animal welfare groups
- General public.

For more details about the various steps and timings of a proposed aerial operation, from planning and operational design to post-operational reporting, see our [Working with communities and interest groups factsheet](#).

6. The impact of operations on water supplies

1080 baits are highly water soluble and only contains 0.15% of 1080 poison. The toxin is readily diluted by rainfall and naturally breaks down in the environment into harmless substances through biodegradation. It does not accumulate or leave permanent residues in soil, plants, water or animals.

In regard to concerns about drinking and using water that has come from a catchment area, it is important to note that consent conditions set by the Ministry of Health through the District Public Health Unit must be followed for all operations. These consent conditions ensure that drinking water supplies are protected from any contamination, even if 1080 is used in parts of the wider catchment. Conditions may include avoiding certain bodies of water or the vicinity of water collection points. The use of GPS tools means that these areas can be safely excluded from bait application.

Consent conditions are regularly audited and often require tests for 1080 residues in water to confirm safety of water supplies. The results from thousands of tests over many years indicate that contamination of waterways with 1080 is not a problem.

Land occupiers and users of water supplies within or adjacent to 1080 operational areas will always be contacted in person well before any operation, to ensure water supply safety and any other possible risks are properly managed.