



19-E-0569 DOC- 6059388

13 September 2019

s 9(2)(a)

Email: s 9(2)(a)

Dear s 9(2)(a)

I refer to your official information request of 16 August 2019 for information on Ospri NZ 1080 operations in the Clarence Valley and Molesworth Station.

My letter of 19 August 2019 advised that we had transferred part of your request to Ospri NZ. This letter forms our response to the remainder of your request.

Permissions for Clarence and Molesworth operations

You requested:

All wildlife act and s95A HSNO permits authorities issued or otherwise held by DoC for the Clarence and last year's Molesworth 1080 drops

We are providing you with copies of the DOC permission letters for the 2019 Clarence West aerial TB possum control operation, and the 2017 Molesworth Station possum control operation. We note that there was no aerial 1080 Molesworth operation last year.

We have withheld the names of individuals from the documents we are providing, under sections 9(2)(a) and 9(2)(g) of the Official Information Act 1982 to protect their privacy and to prevent any improper pressure or harassment of officials or employees. In making this decision, we have taken into account the public interest considerations set out in section 9(1) of the OIA.

Application assessments for Clarence and Molesworth operations

Your request asked for:

Copies of each decision paper assessing the effects, alternatives, possible mitigation, whether or not to grant the permit/ authority etc and what if any conditions to impose.

We are providing you with copies of the application assessment documents for the two operations referred to above.

We have withheld the names of individuals from the document we are providing, under sections 9(2)(a) and 9(2)(g) of the Official Information Act 1982 to protect their privacy and to prevent any improper pressure or harassment of officials or employees. In making this decision, we have taken into account the public interest considerations set out in section 9(1) of the OIA.

Communications on risk to deer from 1080

You requested:

Copies of any communications within doc or between any representative of doc and any third party regarding risk to deer from 1080 Poison and steps to mitigate this whether for Moleworth, Clarence or elsewhere and any review of DoCs policy and approach to the use of poison to take into account the slaughter is very high death rate of deer in Moleworth from 1080

My email of 20 August 2019 advised that this question as currently framed is very broad, and invited you to refine your request. By email on the same day you responded:

*The bykill rate for deer from the Molesworth 1080 poison operation was reported to be over 90% with an estimated 3-4000 deer being killed.
The bykill for deer in Timaru Creek was reported to be over 95%
The bykill for the recent 2019 Clarence 1080 poison drop was reported to be 100% of the collared deer, indicating close to 100% of all deer.*

This indicates that the way 100 is currently used is not sufficiently targeted to authorised target species (possums and rodents), and results in a serious risk of contamination of the food chain and serious animal welfare and other issues. It also undermines the rule of law and public confidence DoC and wider government.

I want the official information to show why this practice has not been stopped immediately, why DoC is persisting in allowing 1080 to be used on public land that it manages in these circumstances, who is driving this and what if any other steps DoC is taking, especially considering the very flimsy and unsubstantiated assumptions linking possums to TB in cattle.

We have determined that both your original question and your refinement of 20 August 2019 seek a very broad array of information, and responding would require substantial collation and research. We are therefore refusing this part of your request under section 18(f) of the OIA.

We have carefully considered our obligations under section 18A of the OIA which imposes a duty to consider charging for the work required to grant a request or extending the time limit to respond before refusing a request under section 18(f). Because of the scale of the necessary work, as well as the volume of requests we are presently dealing with, we have determined that it is not reasonably practicable to adopt either of those options in this instance. In taking this position we have

concluded that the time and resource required would be unreasonably burdensome on the department. Granting your request would unduly interfere with our day to day operations including those under the OIA generally.

Your clarification email of 20 August 2019 also included the following:

If the government has a hidden agenda to:

- a) eradicate deer from some or all of New Zealand,*
- b) try to change New Zealand culture to remove some or all access to the great outdoors, and/or*
- c) prevent New Zealanders from traditional hunting and gathering practices, then surely this and the reasons behind it should be made transparent and the public should be consulted on it.*

We are refusing to respond to this part of your request under section 18(h) of the OIA, as the request is vexatious.

Reports or correspondence to the Minister of Conservation or other third parties

You asked for:

Copies of any reports or other correspondence by doc to its Minister or any other third parties about the slaughter of deer or other species by 1080 poison in Moleworth and/or Clarence, including any draft or final press releases.

We are providing you with one internal media advisory and 6 email chains.

We have withheld the names of individuals from the documents we are providing, under sections 9(2)(a) and 9(2)(g) of the Official Information Act 1982 to protect their privacy and to prevent any improper pressure or harassment of officials or employees. In making this decision, we have taken into account the public interest considerations set out in section 9(1) of the OIA.

Protection of the 'Kiwi lifestyle'

You requested:

Any information to show who if anyone in government is advocating for protection of the kiwi lifestyle and/or safe and accessible hunting of wild foods that are not contaminated by poisons.

We are declining this part of your request under section 18(g) of the OIA, as the information is not held by the Department and we have no grounds for believing that the information is held by another Department or Minister of the Crown.

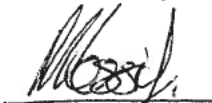
We note that if this information does exist anywhere, it is likely to be publicly available.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact me at this email address.

Please note that this letter (with your personal details removed) and enclosed documents will be published on the Department's website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Kessick', written over a horizontal line.

Martin Kessick
Deputy Director-General, Biodiversity

Document schedule

Item	Date	Document description	Decision
1	11 September 2017	Application for DOC permission to use VTAs: assessment report, Molesworth Tb possum control aerial 1080	Released in part
2	4 October 2017	Permission ID 3167861: Molesworth Station – Possum Control Operation	Released in part
3	11 October 2017	Variation to permission ID 3167861: Molesworth Station – Possum Control Operation	Released in part
4	26 March 2019	Application for DOC permission to use VTAs: assessment report, Clarence West Aerial TB Possum Control	Released in part
5	28 June 2019	Permission ID 5994444: Clarence West Aerial TB Possum Control	Released in part
6	26 March 2019	Internal media advisory: OSPRI report on Molesworth 1080 deer deaths	Released in part
7	26 March 2-19	Email: FW: 1080 & deer	Released in part
8	26 March 2019	Email: RE: 1080 & deer	Released in part
9	1 August 2019	Email: RE: Molesworth deer bykill	Released in part
10	16 August 2019	Email: RE: Clarence deer deaths	Released in part
11	16 August 2019	Email: FW: Clarence River operations – key messages	Released in part
12	16 August 2019	Email: RE: Clarence River operations – key messages	Released in part

Application for DOC permission to use VTAs: assessment report

Applicant name:	§ 9(2)(a), 9(2)(g)(ii), Vector Free Marlborough Ltd
Operation name:	Molesworth Tb possum control aerial 1080
Approving manager:	§ 9(2)(a), 9(2)(g)(ii)
Assessor:	§ 9(2)(a), 9(2)(g)(ii)
Date received:	11/9/2017
Overview:	<p>Vector Free Marlborough Ltd has been engaged to carry out an aerial 1080 operation on the Molesworth Station over the next 3 years, to suppress possum numbers and prevent the spread of tuberculosis from wildlife vectors to domestic livestock in adjacent farmed areas.</p> <p>This aerial 1080 application is part of a 10-year TB Management Plan for the Molesworth Station.</p> <p>The methodology of this operation will be aerially applied 1080, with a possible small section of ground control using Feratox. The following pesticide uses are proposed:</p> <ul style="list-style-type: none"> • Pesticide Use #1 – Sodium fluoroacetate 1.5g/kg cereal pellet Aerial (0.15% 1080 cereal pellet) • Pesticide Use #4 – Cyanide 475g/kg encapsulated pellet with prefeed paste Bait stations (Feratox) <p>Permission is sought to carry out an operation between 29 September 2017 and 20 December 2017.</p> <p>The proposed treatment area is 61,200 ha within Molesworth station.</p> <p>The consultation material prepared by OSPRI indicates that for Molesworth there is a 10-year intensive possum control programme beginning with this proposed operation. The intention is that TB will be eradicated from possums in this area by 2033.</p>
Applicant type:	Independent individual or organisation — National performance standards for pest operations docdm-1492976 will apply.

Step 1 Confirm application is complete *Are all documents (listed below) provided?*

DOC
Application form complete:
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?

All sections of the application form are completed to a standard that allows for assessment. The AEE section has been completed. The application meets the grouping standard.

Are all the proposed pesticide use(s) accepted for use?
Check the Status List category and if any compulsory restrictions apply. If any compulsory information needs apply,

The proposed pesticide uses, #1 (1080, 1.5g/kg, cereal pellet, aerial) and #4 (Cyanide 475g/kg encapsulated pellet with prefeed paste, bait stations) are both accepted for use on the DOC status list.

<p><i>consider if the operation is designed to provide the required information.</i></p>	
<p>Performance standards sheets <i>Is there a performance standard sheet for each pesticide uses proposed, and trapping if applicable?</i></p>	<p>I have attached the performance standards sheets to the drafted permission.</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>Maps have been provided and these meet the minimum standards from Appendix 2 of the application form including showing the proposed locations of warning signs.</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</i></p>	<p>Loaded onto the pesticide app on 21/9.</p>

<p><i>locations match the DOC permission map(s)?</i></p>	
<p>Consultation record including conditions of landowner consents <i>Was level of consultation adequate?</i> <i>All required owner/occupier consents obtained? Are conditions of consent evident in their application?</i></p>	<p>A communications log has been provided and a summary of consultation is included in the application. This indicates that consultation has occurred with Iwi, adjoining landowners/occupiers, and other stakeholder and interest groups.</p> <p>Consultation has taken place with the Molesworth Station working group which includes the manager, § 9(2)(a). Consent has been obtained from Landcorp § 9(2)(a) as the land occupier. https://doccm.doc.govt.nz/wcc/faces/wccdoc?dID=4204975&dDocName=DOC-3170246</p>
<p>Public health permission/ proof of 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>The application for public health permission has been provided. A copy of the public health permission has been received (29/9)</p>
<p>Other (specify e.g. RMA consent)</p>	
<p>Your confirmation email and subsequent correspondence <i>Include dates and nature of requests for</i></p>	<p>8/9/2017 application received by email 11/9/2017 latest Molesworth concessionaires report provided 11/9/2017 PH application requested 11/9/2017 we received revised sign location maps after further consultation with DOC 11/9/2017 PH application and cover letter received 11/9/2017 email from § 9(2)(a), 9(2)(g)(ii) confirming he has had conversations with § 9(2)(a), 9(2)(g)(ii) about the effect of the 1080 op on the black fronted tern project 12/9/2017 Shape files requested</p>

<p>further information.</p>	<p>12/9/2017 DOC provided links to publicly accessible data on website showing counter reports from the main roads on Molesworth</p> <p>19/9/2017 s 9(2)(a), 9(2)(g)(ii) requested information on the location of the Acheron Swing bridge shelter.</p> <p>19/9/2017 email sent with snip of map and location details for swing bridge</p> <p>19/9/2017 s 9(2)(a), 9(2)(g)(ii) sent email notifying s 9(2)(a), 9(2)(g)(ii) that the Clarence river bridge had been washed out and would be impassable for an unknown period of time.</p> <p>19/9/2017 Requested copy of consent from Landcorp for operation</p> <p>20/9/17 Signed consent copy provided</p> <p>20/9/17 email with map for location of deer repellent to be added to application</p> <p>https://doccm.doc.govt.nz/wcc/faces/wccdoc?dID=4205240&dDocName=DOC-3170304</p> <p>25/9/17 Ph message from s 9(2)(a), 9(2)(g)(ii) requesting information about the water supplies for various huts on Molesworth</p> <p>25/9/17 s 9(2)(a), 9(2)(g)(ii) requested map from s 9(2)(a), 9(2)(g)(ii) showing all land tenure in and around the treatment area.</p> <p>25/9/17 Info provided to Barry re water takes by s 9(2)(a), 9(2)(g)(ii)</p> <p>26/9/17 s 9(2)(a), 9(2)(g)(ii) rang to confirm that there is no water supply at the shelters</p> <p>29/9/17 s 9(2)(a), 9(2)(g)(ii) emailed a copy of the PHP to s 9(2)(a), 9(2)(g)(ii).</p>
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Step 2 Capture treatment blocks in the Pesticide Application

<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>Loaded onto the app 21/9/17.</p>
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Step 3 Evaluate control method *Is the proposed method suited to the pest problem, treatment area and consultation outcomes?*

<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 area is within a large and isolated high-country cattle station. There is close consultation/collaboration with the farm manager so it is taken that the control method is compatible with the land use and farming activities have been adjusted to ensure domestic stock are not exposed to toxic bait. Aerial application of 1080 cereal pellets, is well suited to controlling possums in the treatment area. The area is very large (61,200 ha), and includes difficult terrain. The method details can be expected to achieve effective possum control.</p> <p>If the operation cannot be completed before the Acheron road is opened to the public on 21 October a margin adjacent to the road will be excluded from aerial application and encapsulated cyanide will be applied in bait stations in this treatment block.</p>
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Label directions <i>Check the product label to ensure that the proposed method detail complies with the label content.</i>	The proposed method details are consistent with the product labels
Summary of any technical advice received on the proposed control methods.	Not sought
Summary of any Community relations and Pou Tairangahau advice received.	<p>Iwi consultation opportunity is apparent from the communications log.</p> <p>20/9/17 ^{s 9(2)(a), 9(2)(g)(ii)} spoke to ^{s 9(2)(a), 9(2)(g)(ii)} for advice on the iwi consultation, he suggested speaking to ^{s 9(2)(a)}.</p> <p>25/9/17 ^{s 9(2)(a), 9(2)(g)(ii)} spoke to ^{s 9(2)(a)} of Kaikoura Runanga. She commented that things were a bit dysfunctional at the moment at the runanga so its possible there has been communication but not that she is aware of. In general terms things have been quite good in the past for communication. ^{s 9(2)(a)} commented that it would be good is if there was an effort made by the contractor prior to a big operation to have a phone conversation with each iwi. Eg "We are just touching base; are you happy with things, is there anything you want to change? ^{s 9(2)(a), 9(2)(g)(ii)} will pass this feedback on to OSPRI.</p> <p>25/9/17 ^{s 9(2)(a), 9(2)(g)(ii)} tried to check in with ^{s 9(2)(a), 9(2)(g)(ii)}, Pou for NSI. Left message.</p> <p>25/9/17 ^{s 9(2)(a), 9(2)(g)(ii)} consulted http://www.tkm.govt.nz/region/te-tau-ihu/ and determined that all iwi that may have an interest in the area had been consulted or sent email notification.</p>
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)?	The AEE section covers the risks to domestic and feral animals well. The native non-targets present are not considered to be at high risk from this operation. Kea are unlikely to be present in the operational area.
Relevant points from the DOC Pesticide Information Reviews	None of the native species present are considered to be at risk of population level losses from the operation.
Summary of any technical or	^{s 9(2)(a), 9(2)(g)(ii)} provided information regarding the BFT study and the impact of the possum operation on the study design. This is a DOC project to test management techniques for

community relations advice received	improving the nesting success of Black Fronted Terns is in place on the Clarence and Acheron Rivers adjacent to the operational area. There are a number of breeding colonies with assigned treatment (predator control and habitat enhancement) or as non-treatments. The leads for this research have been aware of the proposed 2017 Molesworth Possum control operation and have adjusted the research plan to accommodate this.
Other resources consulted (specify)	
Your assessment of technical risks and adverse effects (e.g. the pesticide use, use pattern, site factors)	The block is outside of kea range expressed in the Code of Practice for aerial 1080 in Kea Habitat. On this basis, the operation does not need to comply with the performance standards of the COP.
Your assessment of non-technical risks (e.g. high public use, consultation outcomes)	<p>The Acheron road opened to the public from 21 October. Visitors are generally limited to the road and pull over areas. There is a public walking route from the Clarence River to Elliot Hut -Lake McRae and Robinson Saddle and down the Robinson Creek. This route (East West Route) is open all year round for walking. You need a special permit for horse access. Low use <100 people/yr.</p> <p>There are Public and Private huts within the treatment area. Public Huts, are Lake McRae and Elliot Biv. These huts are unbooked, first in first served. Their use is likely to be low as they are mainly used by hunters and there is no helicopter access for recreation.</p> <p>There are Private huts that are used by Landcorp staff as part of the farming operation.</p> <p>The area is used by recreational hunters for big game animals through a balloted block system currently managed by DOC. There has been increasing interest and demand for hunting on Molesworth. Hunting access is managed 2 ways. For general hunting outside the roar period hunters can apply online for specific blocks. http://www.doc.govt.nz/Documents/parks-and-recreation/hunting/nelson-marlborough/molesworth/molesworth-hunting-blocks-overview.pdf Not all blocks are available at all times depending on stock movements.</p> <p>During the roar period there is a ballot for which there is also an online application. There is a maximum of 100 permits issued during the roar and these permits allow up to 5 people per permit to hunt/access.</p> <p>From July 16 to July 17 there were 751 permits issued to individuals to hunt on Molesworth in its entirety. This covers the period post Kaikoura earthquake when access was limited due to road closures so it would be reasonable to expect more than this would be the norm.</p>

	<p>Organised goose shooting is managed by s 9(2)(a) . The next organised shoot is planned for 11th – 14th October. There has been consultation with s 9(2)(a) and as you will see on the facebook page he has been in touch with the hunters. Some have pulled out as they do not want to take their dogs and others are concerned about having the pellets falling on them. https://www.facebook.com/molesworthgoosehunt/</p> <p>Anglers use the area to access the Acheron and Clarence Rivers. The Acheron season is limited by the road opening. The Clarence is defined by fish game as open all year round. Much of the Clarence is inaccessible unless accessed by raft, some 4wd across private property, helicopter.</p> <p>There are 2 special permits that allow access for handicap fishers to access areas normally with restricted vehicle access. These people have been notified by DOC of the operation.</p> <p>The operation is adjacent to other high country stations.</p> <p>Concessions are held for: plant and food research, wildlife/botanical research, sporting competitions/outdoor pursuits, OSPRI, 4wd, sightseeing, research, GNS, photography/filming, fishing, guiding, rafting/canoeing, Transpower.</p> <p>There are lots of heli operators listed under WARO but there is no access for this on Molesworth</p>
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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>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>For PU#1, using the caution period calculator the estimated caution period is 8 months and is subject to compulsory bait and carcass monitoring.</p> <p>For PU#4 the estimated cation period is 2 months after bait removal.</p>
<p>How well does the proposed operation manage potential risks to native fauna? <i>(i.e. as proposed in the Application form or</i></p>	<p>Risks to populations of native fauna are low for this proposed operation.</p>

performance standards)	
How well are other potential risks managed? (i.e. as proposed in the Application form or performance standards)	Public and other land user risks are well managed by the isolation of most the area and the conditions of the public health permission. If application can occur before 21 October (prior to the Acheron Road being opened) the proposal is to apply prefeed and toxic bait to the road and clear bait from the road once application is completed.
Are you satisfied with the proposed warning sign locations and normal points of entry?	The proposed warning sign locations have been negotiated with Wairau/Renwick staff and they are happy with the locations.
Summary of any technical or community relations advice received	<p>§ 9(2)(a), § 9(2)(g)(ii) requested advice from § 9(2)(a), § 9(2)(g)(ii) around the food safety implications for consumption of goose meat. Provided the following advice for § 9(2)(a), § 9(2)(g)(ii) and § 9(2)(a), § 9(2)(g)(ii) if they have questions raised with respect to the organised goose shoot:</p> <ul style="list-style-type: none"> • MPI food safety for hunters publication notes: <i>evidence has shown that pesticide residues in game birds are likely to be insignificant.</i> • Sub lethally dosed mallards substantially eliminated 1080 from heart muscle and blood within 24 hrs (Ataria 2000, in Fairweather et al 2017, 1080 pesticide info review). • Even when there is toxic bait present on the ground the odds of a shot goose having eaten 1080 bait and still having and 1080 residues is very low; the odds that the cooked tissue could pose a human health risk is lower still. • We cannot eliminate the theoretical possibility that, while 1080 bait is available (1080 will be washed out of RS5 bait after 100-150mm of rain), geese could have consumed 1080 bait and for a short time after awards (1day) contain 1080 residues. People may wish to refrain from eating the geese that may have been exposed to 1080 bait within a short timeframe.
Public health permission, including application form sighted (if not provided at time of application)	Public health permission has been received for the operation. Conditions include: The public huts are excluded from aerial application by 50m, the Acheron bridge shelter by 100m. Water supply mitigation for the huts must include disconnection of the roof feed supply from the tank prior to bait application and reconnection after the application and

<p><i>Consider if public health permission has any impact on DOC permission conditions.</i></p>	<p>inspection has verified than no bait has been applied to the roof. An alternative drinking water supply must be provided for 72hrs following bait application. If the tanks have been isolated from the intakes then they are regarded as alternative supplies.</p> <p>The Acheron road, swing bridge and layby must be excluded from aerial application by a distance of 50 meters if application occurs after 21 October. If the aerial 1080 is applied before/on 21 October bait may be applied to the Acheron Rd and the road closed to the public by signage and physical barrier and the road checked for and cleared of baits and carcasses within 24 hrs</p> <p>The operator must supply information including precautions relating to 1080 toxin to the organiser of the goose hunt if the operation occurs on or prior to the 12-15 October.</p>
<p>Other resources consulted (specify)</p>	
<p>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></p>	<p>None. The compulsory performance standards are sufficient.</p>
<p>Step 6 Make a recommendation <i>Should the application be approved or declined?</i></p>	
<p>What key points should the approving manager have drawn to their attention?</p>	<ul style="list-style-type: none"> • The operation has been planned in consultation with the Molesworth Station manager. • Public access to and use of the large and remote operational area is low • The operation may occur after the Acheron Rd has opened (21 October) but if this occurs the aerial 1080 application will exclude the road and a margin either side.
<p>Is approval or decline recommended? <i>If declined, summarise reasons. If approved, is a readiness check</i></p>	<p>Approval recommended.</p>

<p><i>recommended (DOC operations only – see Pre-Operational Step 7 of the Operational planning for animal pest operations SOP)?</i></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>Draft letter of permission, PS Sheets, Maps.</p>
<p>For recommended decline: <i>Attach draft letter of decline including a summary of reasons.</i></p>	

<p>Record of permission decisions that differ from the assessor recommendation</p>	
<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. 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>	

Released under the Official Information Act



Department of Conservation
Te Papa Atawhai

4 October 2017

§ 9(2)(a), 9(2)(g)(ii)

Vector Free Marlborough Ltd
Private Bag 1007
Blenheim 7240

CC: permissions@epa.govt.nz
Delivery Planner (Biodiversity)

ATTENTION: § 9(2)(a), 9(2)(g)(ii)

**PERMISSION ID 3167861:
Molesworth Station – Possum Control Operation**

Permission is granted under:

- Section 95A of the Hazardous Substances and New Organisms Act 1996
 - Section 50(1) of the Reserves Act 1977
 - Section 38(4)(c) of the Conservation Act 1987
- for the Director of Vector Free Marlborough Ltd or any other person acting under his or her authority to apply sodium fluoroacetate 1.5g/kg cereal pellet aerial (0.15% 1080 cereal pellet) and cyanide 475g/kg encapsulated pellet with prefeed paste bait stations (Feratox) on or after 4 October 2017 until 15 December 2017 on the lands listed below and shown on the **attached map**:

1. 60,612.12 hectares of Molesworth Recreation Reserve a Recreation Reserve under section 17 of the Reserves Act 1977.
2. 58.15 hectares of Ka Whata Tu o Rakihouia Conservation Park a Conservation Park under section 19 of the Conservation Act 1987
3. 9.53 hectares of Clarence River Alfred Stream Marginal Strip a Marginal Strip under section 24 of the Conservation Act 1987
4. 2.30 hectares of Clarence River Gore Stream Marginal Strip a Marginal Strip under section 24 of the Conservation Act 1987
5. 1.77 hectares of Clarence River Palmer Stream Marginal Strip a Marginal Strip under section 24 of the Conservation Act 1987
6. 0.70 hectares of Red Hill Stream Marginal Strip a Marginal Strip under section 24 of the Conservation Act.
7. 0.06 hectares of The Hossack Conservation Area a Stewardship Area under section 25 of the Conservation Act 1987

Non-toxic prefeed may be applied no earlier than 2 October 2017.

I understand this operation is being undertaken for the purpose of controlling possums as part of an attempt to eradicate TB from possums in the area by 2033. The permission is given subject to the requirement that the operation:

- Is carried out as described in the Application Form submitted 11/9/2017
- Meets the conditions shown in the attached sheets of DOC Performance Standards for Pesticide Uses Numbers 1 & 4
- Meets the conditions listed in the National Performance Standards for Pest Operations docdm-1492976

Auditing may occur to establish whether those conditions are being met. If not, the permission will be revoked and further action may ensue.

DOC expects you, your organisation company and any contractors to identify, assess, and manage safety hazards for this work as part of its operational risk assessment or equivalent. At this time DOC is aware of the following specific significant hazards and activities at this site, which may affect your work programme:

- The presence of the HVDC Inter-Island power link is the primary risk for helicopters. All pilots involved should receive a specific briefing from the Station Manager for individual wires etc. Other known hazards are those normally found in a remote high-country location e.g. river crossings, snow etc.
- The remediation of the Clarence Bridge will occur as soon as possible.
- Depending on the timing of the operation there may be other helicopter work planned for wilding tree control. This work will be postponed or relocated on receipt of 24 hour notice.
- The preparation for the summer season will start in October. This will all occur on the main road corridor and at DOC huts at Molesworth and Acheron.
- There is road maintenance planned on the Acheron road in the week after road opening, weather dependent. This will involve a grader, gravelling and some culvert clearing.

This advice is subject to change between now and your planned pest control. I recommend that you request an update when you provide us with the twenty-four hour notice for the operation.

s 9(2)(a), 9(2)(g)(ii)

s 9(2)(a), 9(2)(g)(ii)

Director Operations, Nelson
Pursuant to a written delegation from:

- The Environmental Protection Authority under Section 95A of the Hazardous Substances and New Organisms Act 1996
- The Director-General of Conservation under Section 50(1) of the Reserves Act 1977
- The Director-General of Conservation under Section 38(4)(c) of the Conservation Act 1987

Enc: Map(s)
DOC Performance Standards
Application Assessment Report

Pesticide Use #1	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (0.15% 1080 Pellet)	Target Pests: Possums, Rats
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Location of operation
Molesworth Station – Possum Control Operation



Caution Period
The estimated caution period for this operation is 8 months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards

Compulsory for all operations

1. For operations targeting rats, prefeed with this pesticide use.
2. The DOC Code of practice for aerial 1080 in kea habitat [DOC-2612859](#) must be followed.
3. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
4. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
5. For operations targeting possums, baits will have a mean size in excess of 6g and 95% of baits should weigh more than 4g.
6. The baits must be dyed green or blue.
7. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until you judge that there is no longer a risk to stock.
8. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible and stock removed from the area.
9. The product must only be used as specified on the manufacturer's product label.

Compulsory for this operation

NIL

Information Needs

Compulsory for all operations

Nil

Compulsory for this operation

Nil

Operational Planning & Design Considerations

- Apply bait in coldest months of year.
- For operations targeting possums, do not repeat aerial operations within 4 years using the same bait.
- Current Agreed Best Practice – Possum Control – Aerial Application of 1080 Cereal Pellets [docdm-341728](#)
- Current Agreed Best Practice – Rat Control – Aerial Application of 1080 Cereal Bait [docdm-29375](#)

My approval dated 4 October 2017 is subject to these performance standards being met. Compliance monitoring may occur.

s 9(2)(a), 9(2)(g)(ii)

s 9(2)(a), 9(2)(g)(ii)

Director, Operations

Pesticide Use #4	Cyanide 475g/kg Encapsulated pellet with prefeed paste Bait stations (Feratox)	Target Pests: Possums, Dama wallabies
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Location of operation
Molesworth Station – Possum Control Operation



Caution Period
The estimated caution period for this operation is 2 months after bait removal. This estimated caution period cannot be less than 2 months.

Performance Standards

- Compulsory for **all** operations*
1. Where weka are present - KK bait stations must not be used in these areas. For other bait station types, the bait station design and placement must be proven to prevent weka accessing bait, including preventing Feratox pellets being spilt. An example of a bait station that meets this requirement is the Sentry bait station with the Excluder weka and rat proof attachment.
 2. For operations targeting dama wallabies, use a bait station designed for wallabies. (See [docdm-535602](#) for an example.)
 3. For operations targeting dama wallabies, take steps to reduce possum and rat interference by controlling possums and rats prior to the operation.
 4. The baits must be dyed green or blue.
 5. Use only the following scent lures: cinnamon, orange, aniseed, plum, cherry and lemon. All other scent lures are prohibited. Visual lures (e.g.; flour and icing sugar) can be used.
 6. Bait stations will be removed or made pesticide-free at the completion of the operation.
 7. The product must only be used as specified on the manufacturer's product label.

Compulsory for this operation

NIL

Compulsory Information Needs

*Compulsory for **all** operations*

Nil

Compulsory for this operation

Nil

Operational Planning & Design Considerations

- For operations targeting possums, consider rodent density during operational planning, as high rat numbers will affect efficacy for possums.
- Current Agreed Best Practice – Possum Control – Bait Stations Using Encapsulated Cyanide (Feratox) [docdm-29789](#).

My approval dated 4 October 2017 is subject to these performance standards being met. Compliance monitoring may occur.

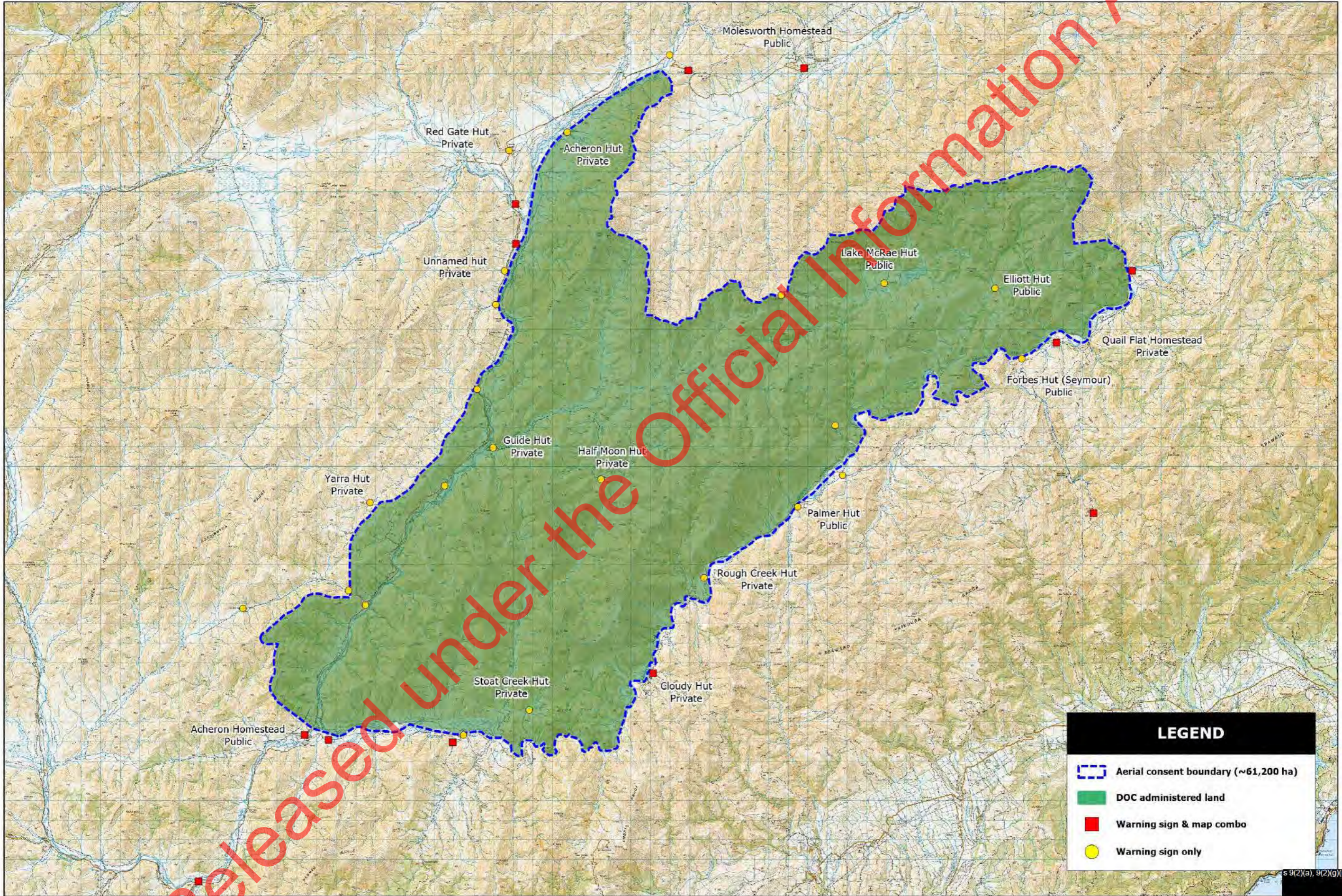
s 9(2)(a), 9(2)(g)(ii)

[Redacted signature]

s 9(2)(a), 9(2)(g)(ii), Director, Operations

Released under the Official Information Act

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LEGEND

- Aerial consent boundary (~61,200 ha)
- DOC administered land
- Warning sign & map combo
- Warning sign only

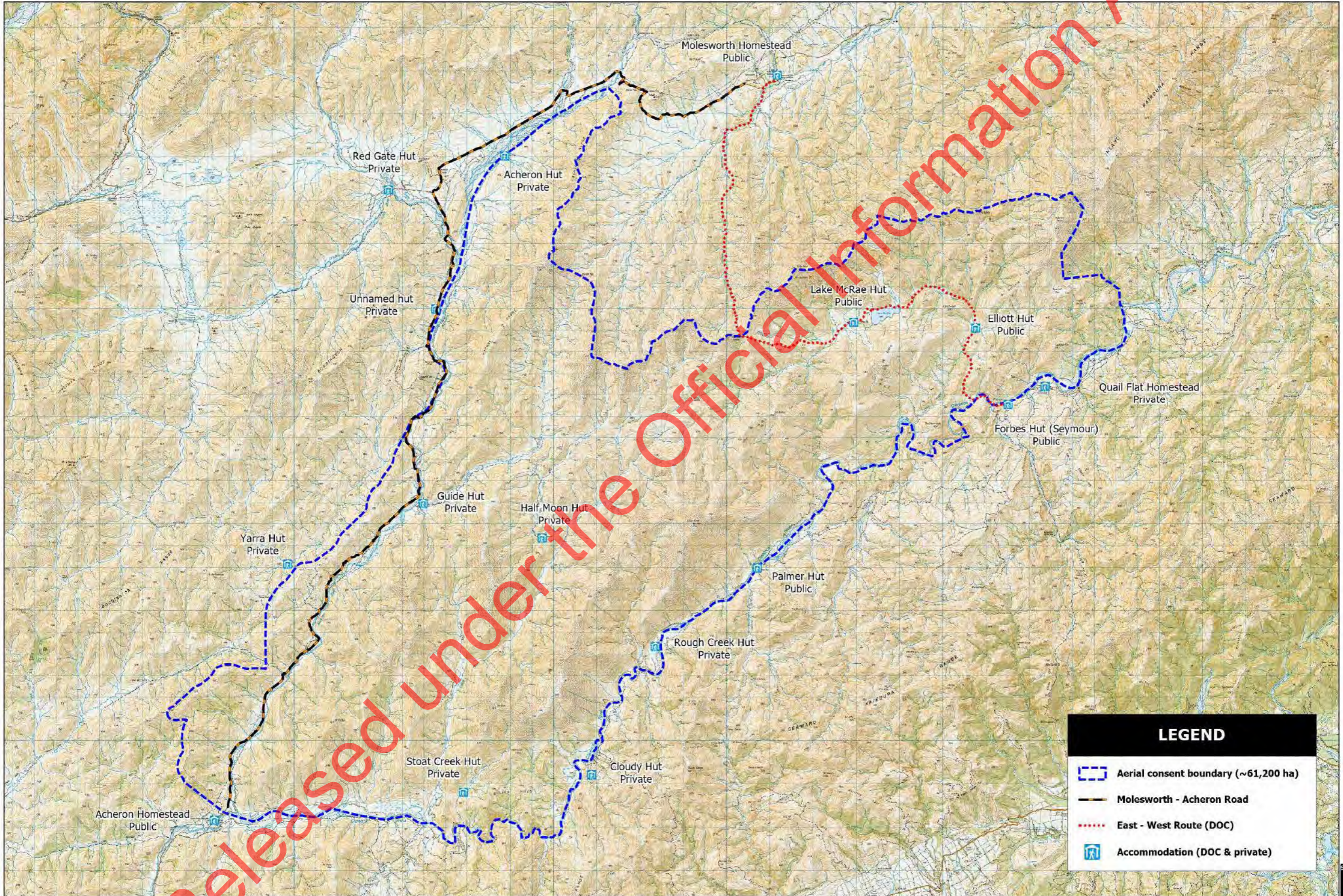
2017 TBfree NZ Molesworth aerial possum control
Map showing land tenure & indicative warning sign placement

Basemap sourced from Land Information New Zealand and licensed for re-use under the Creative Commons Attribution 3.0 New Zealand licence.

Proj: New Zealand Transverse Mercator
Prepared: 11/09/17
Scale: 1:170000



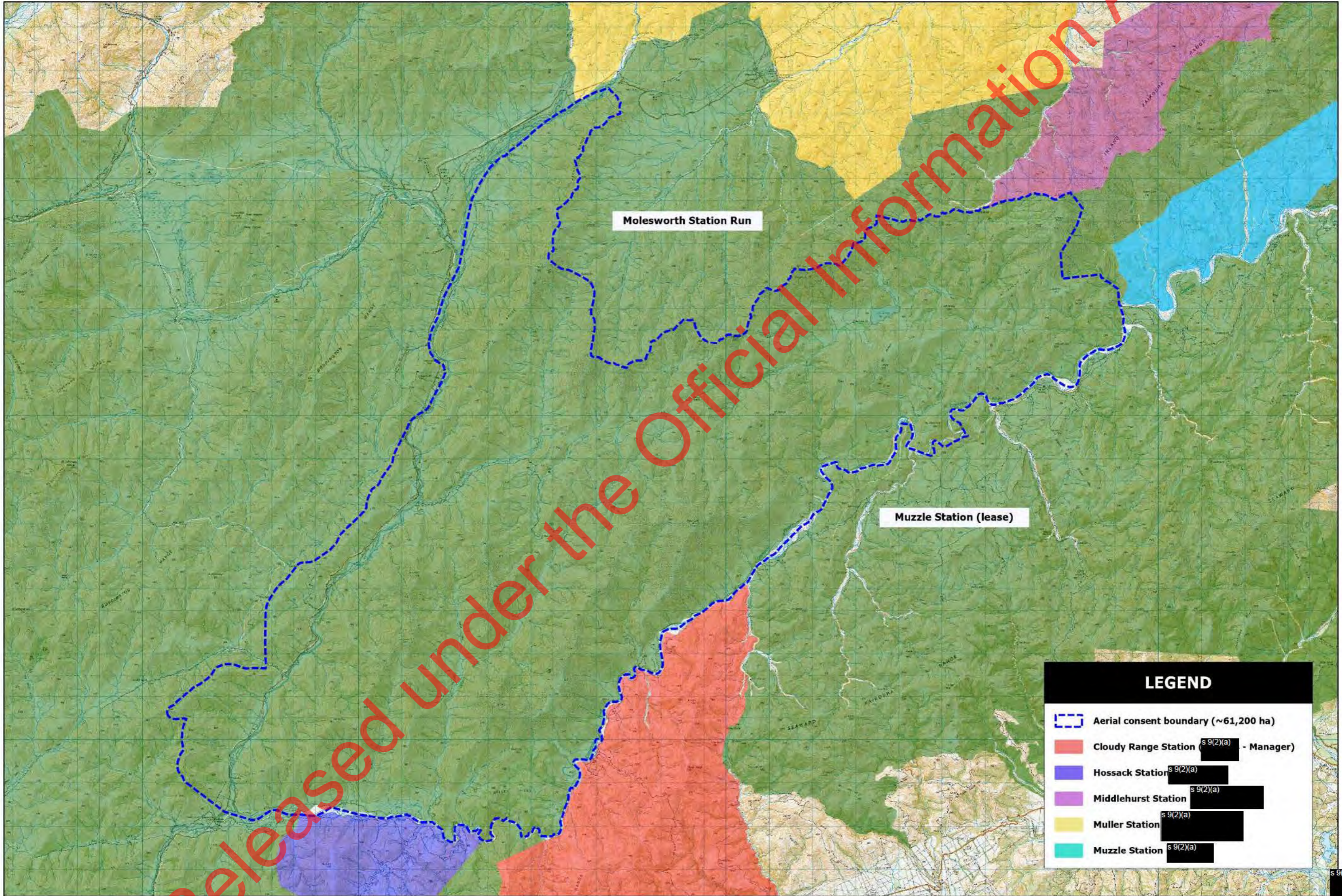
Released under the Official Information Act



LEGEND

- Aerial consent boundary (~61,200 ha)
- Molesworth - Acheron Road
- East - West Route (DOC)
- Accommodation (DOC & private)

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LEGEND

- Aerial consent boundary (~61,200 ha)
- Cloudy Range Station ^{s 9(2)(a)} - Manager
- Hossack Station ^{s 9(2)(a)}
- Middlehurst Station ^{s 9(2)(a)}
- Muller Station ^{s 9(2)(a)}
- Muzzle Station ^{s 9(2)(a)}

2017 TBfree NZ Molesworth aerial possum control
Map showing overview of control area & land tenure

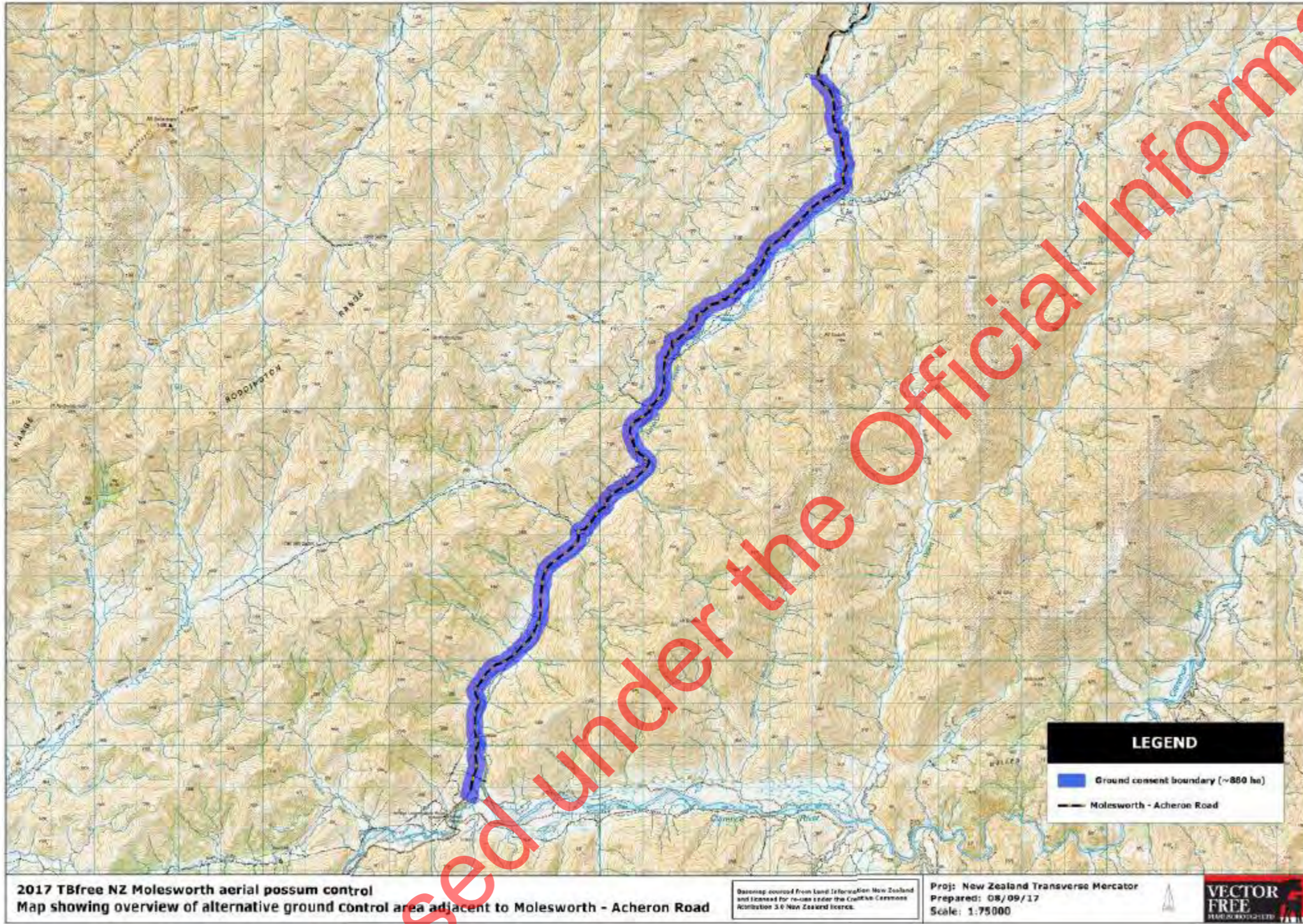
Basemap sourced from Land Information New Zealand
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Proj: New Zealand Transverse Mercator
Prepared: 27/09/17
Scale: 1:150000



s 9(2)(a), 9(2)(g)(ii)

Map of proposed ground control – post 21st October if not controlled by aerial 1080 applications.



s 9(2)(a), 9(2)(g)(ii)



Department of Conservation
Te Papa Atawhai

11 October 2017

s 9(2)(a), 9(2)(g)(ii)

Vector Free Marlborough Ltd
Private Bag 1007
Blenheim 7240

CC: permissions@epa.govt.nz
Delivery Planner (Biodiversity)

ATTENTION: s 9(2)(a),
9(2)(g)(ii)

**VARIATION TO PERMISSION ID 3167861:
Molesworth Station—POSSUM CONTROL OPERATION.**

Under section 95A(7)(a) of the Hazardous Substances and New Organisms Act 1996, the following condition/s of the permission ID 3167861 issued to you on 4 October 2017 (“the Permission”) are:

ADDED:

- Maps as attached showing **an additional 2,981 hectares of treatment area.**
- To the performance standards for Pesticide Use 1, **compulsory for this operation:**
 - If the application occurs before 21 October 2017, the Pudding Hill Walking Track will be over-sown with toxic bait and checked for and cleared of bait within 24hrs of application; OR
 - If the application occurs on or after 21 October 2017, the Pudding Hill Walking Track will have signs advising public not to access during the bait application. The track must be checked and cleared of bait within 2hrs of application, and the ‘no access’ signs removed once this has been completed.

VARIED:

- The area of 60,612.12 hectares of Molesworth Recreation Reserve has increased to **63,503.12 hectares of Molesworth Recreation Reserve a Recreation Reserve under section 17 of the Reserves Act 1977.**

All other conditions of the Permission remain unchanged.

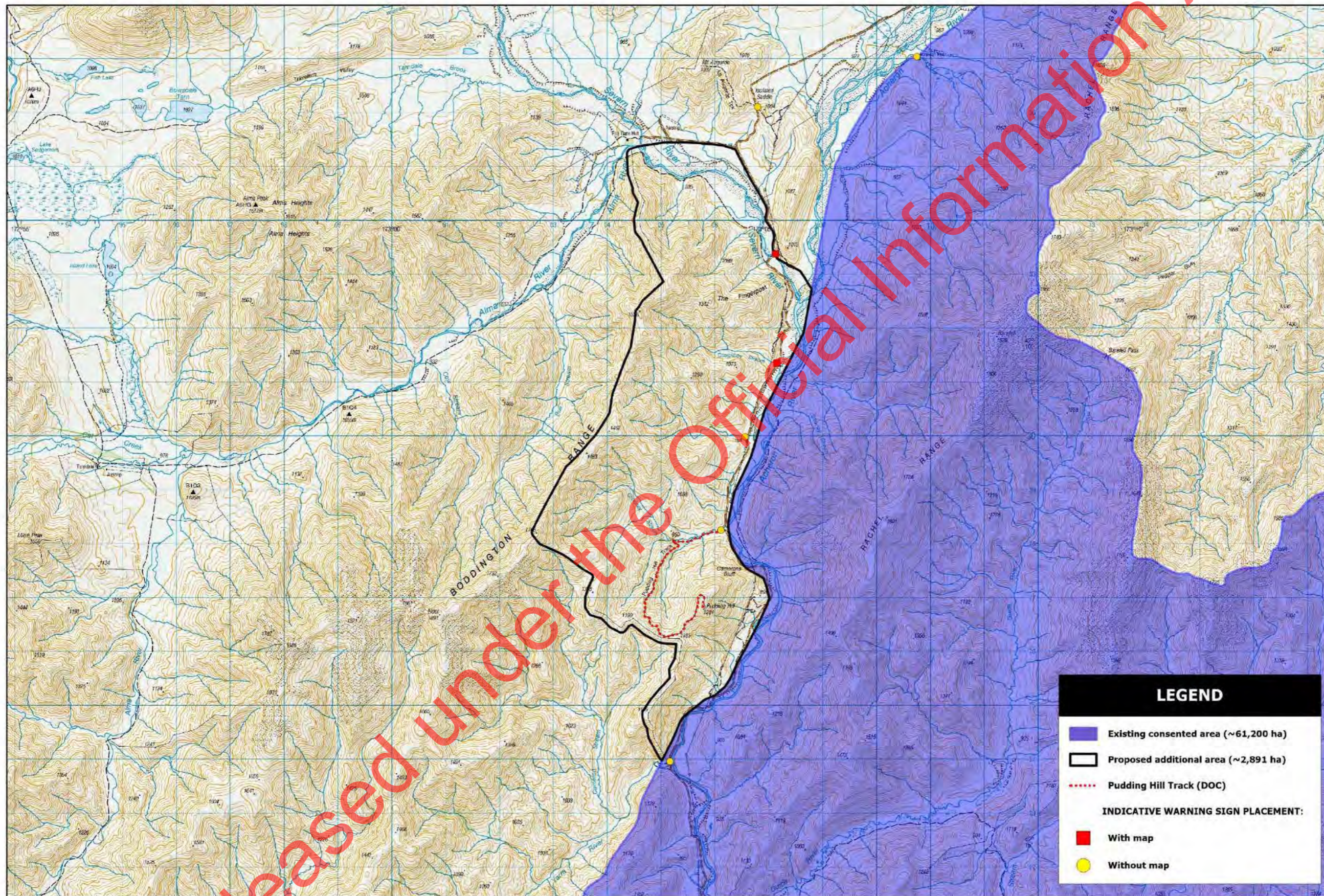
s 9(2)(a), 9(2)(g)(ii)

s 9(2)(a), 9(2)(g)(ii)

Director Operations, Nelson
Pursuant to a written delegation from:

- The Environmental Protection Authority
- The Director-General of Conservation under Section 50(1) of the Reserves Act 1977
- The Director-General of Conservation under Section 38(4)(c) of the Conservation Act 1987

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LEGEND

- Existing consented area (~61,200 ha)
- Proposed additional area (~2,891 ha)
- Pudding Hill Track (DOC)

INDICATIVE WARNING SIGN PLACEMENT:

- With map
- Without map

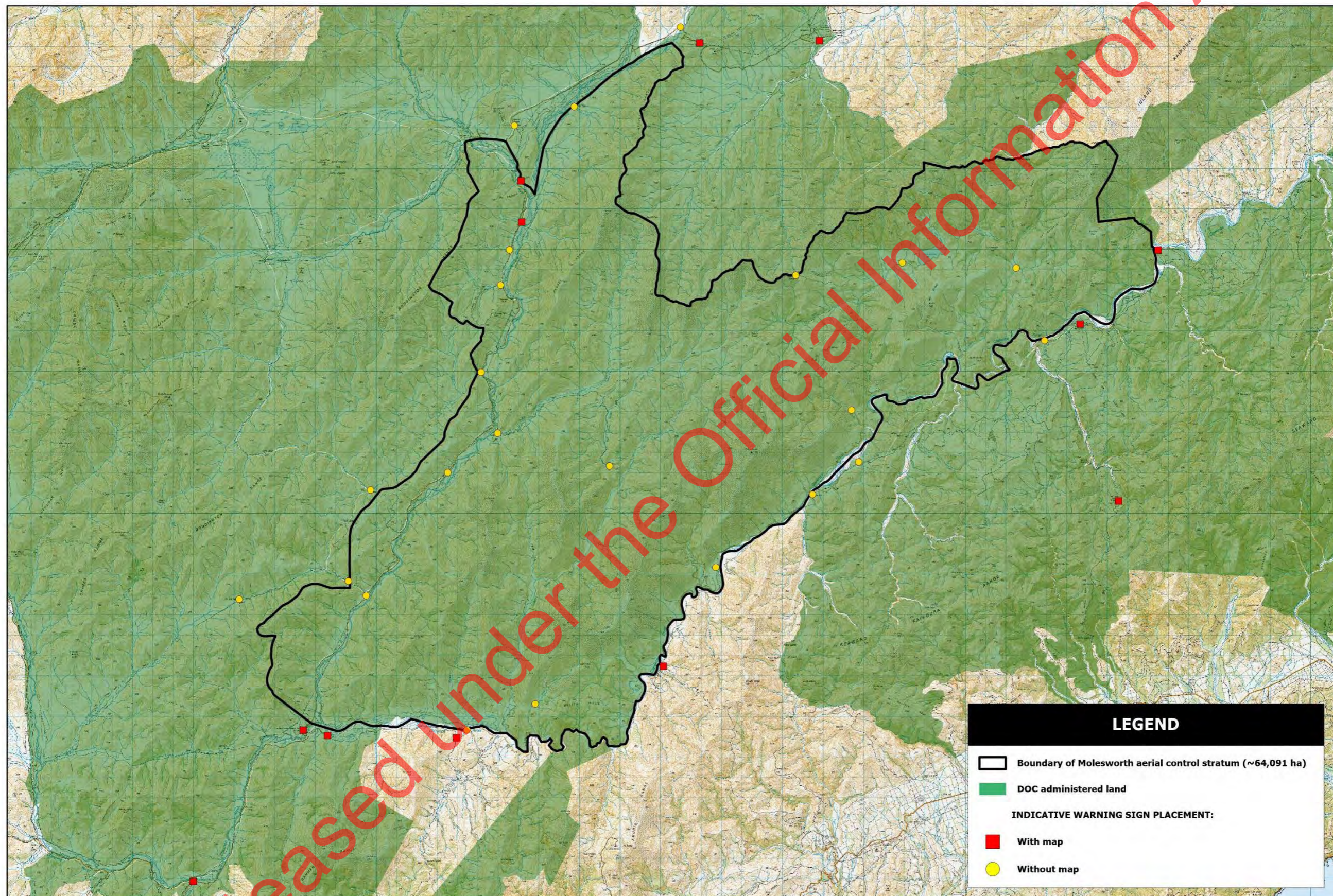
2017 TBfree NZ Molesworth aerial possum control
Map showing addition to aerial control stratum

Basemap sourced from Land Information New Zealand and licensed for re-use under the Creative Commons Attribution 3.0 New Zealand licence.

Proj: New Zealand Transverse Mercator
Prepared: 09/10/17
Scale: 1:60000



Released under the Official Information Act



2017 TBfree NZ Molesworth aerial possum control
Map showing revised aerial control stratum

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Proj: New Zealand Transverse Mercator
Prepared: 09/10/17
Scale: 1:160000



Application for DOC permission to use VTAs: assessment report

Applicant name:	█ § 9(2)(a), 9(2)(g)(ii), Vector Free Marlborough Limited
Operation name:	Clarence West Aerial TB Possum Control
Approving manager:	█ § 9(2)(a), 9(2)(g)(ii)
Assessor:	█ § 9(2)(a), 9(2)(g)(ii)
Date received:	26/3/2019
Overview:	<p>Vector Free Marlborough Limited (VFML) has been engaged by TBfree New Zealand (TBfree NZ) to carry out the Clarence West aerial possum control operations in Marlborough during winter 2019, to suppress possum numbers and prevent the spread of tuberculosis from wildlife vectors to domestic livestock in adjacent farmed areas.</p> <p>In addition to various tenures of public conservation land administered by the Department of Conservation (DOC), the control area also takes in considerable tracts of privately held land which is managed for stock grazing purposes.</p> <p>TBfree NZ have requested that a Deer Repellent bait trial is to be applied to this aerial project. This trial will form the basis of a new Deer Repellent bait if found to be successful will be used for future aerial 1080 applications where the need to use the repellent is required.</p> <p>The principal methodology for operation control will be aerially applied 1080, and the following pesticide uses are proposed:</p> <ul style="list-style-type: none"> • Pesticide Use #140 - Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pestex) • New Pesticide Trial - Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pestex with Deer repellent) <p>Permission is sought to carry out this operation between 1st May 2019 and 1st May 2020, with indicative commencement dates as follows:</p> <ul style="list-style-type: none"> • Clarence West– 1st May 2019
Applicant type:	Independent individual or organisation — National performance standards for pest operations docdm-1492976 will apply.

Step 1 Confirm application is complete *Are all documents (listed below) provided?*

<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?</i></p> <p><i>Is the operational information for treatment blocks clearly separated in each section of the application form where differences exist between them?</i></p> <p><i>Does the proposed application meet the grouping standard (see Applying for DOC permission for external agencies or Operational planning for animal pest operations SOP ?</i></p> <p><i>Where required, was the AEE section completed?</i></p>	<p>Some sections required more detail. Revision received 8/04/2019</p> <p>Further information on deer repellent including EPA and ACVM registrations sought from PCR. These were supplied 9/05/2019, but ACVM provisional registration didn't allow product use on public land. ACVM registration provided 28/06/2019.</p> <p>Detail lacking around separation of deer repellent and repellent free areas. GPX files and map of specific blocks requested from vector free Marlborough 22/05/2019- Provided 28/06/2019</p> <p>AEE is completed to a comprehensive standard, but appears to be cut and pasted from other applications and contains some irrelevant information e.g. impact on Tahr.</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>Aerial application of 1080 1.5g/kg Cereal pellet (Pestex) is accepted (pesticide use #140).</p> <p>Pellets incorporating deer repellent are not currently accepted for use. This has been assessed by the DOC pesticide advisory group (PAG), who are awaiting confirmation that the trial operation is not in breach of ACVM approval. If permission is granted, this will follow specific performance standards drafted for this operation</p>
<p>Performance standards sheets <i>Is there a performance standard sheet for each pesticide uses proposed, and trapping if applicable?</i></p>	<p>Yes- drafted specifically for this trial by the PAG.</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>Map meets standards -Additional warning sign locations identified and added for rafting and jetboat access locations.</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>	Shapefiles provided 8/4/19. Uploaded to pesticide app on 10/04/19
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>	Consultation log has been provided. Consultation appears adequate with land occupiers and adjacent occupiers. Consultation was attempted with relevant Iwi, but Iwi did not engage. Operations manager is confident this is acceptable.
Public health permission/ proof of 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>	Public health permission sighted.
Other (specify, e.g. RMA consent)	EPA and ACVM registration for deer repellent bait sighted by PAG. ACVM does not allow distribution
Your confirmation email and subsequent correspondence <i>Include dates and nature of requests for further information.</i>	Interim assessment completed 3/04/2019 and request for more information sent on this date. Additional information received 8/04/2019
Step 2 Capture treatment blocks in the Pesticide Application	
Your publication of the proposed operation on the DOC Pesticide Summary (independent groups or individuals only) <i>Include date and note any issues.</i>	Shapefiles provided 8/04/2019. Uploaded to pesticide App 10/04/2019
Step 3 Evaluate control method <i>Is the proposed method suited to the pest problem, treatment area and consultation outcomes?</i>	
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>	As area to be treated is large, remote, and in places very rugged, aerially distributed 1080 pellets are the only realistic control method available.
Label directions <i>Check the product label to ensure that the proposed method detail complies with the label content.</i>	Method complies with label instructions and DOC performance standards (except kea standards)
Summary of any technical advice received on the proposed control methods.	Specific performance standards relating to deer repellent drafted by PAG. Performance standards 1,4,5,6 to be waived relating to application of baits in Kea habitat.

Summary of any Community relations and Pou Tairangahau advice received.	Operations manager is confident that consultation conducted with Iwi has been adequate.
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)?	AEE appears thorough, although Kea issue is complex. Technical advisor is satisfied risk to kea is low and happy to make exemptions from performance standards.
Relevant points from the DOC Pesticide Information Reviews	Aerial 1080 application generally has positive effects on indigenous biodiversity. The addition of an untested deer repellent compound complicates this, as there is potential for this to change palatability of the pellets to native species, however technical advisors are satisfied the risk of this is low.
Summary of any technical or community relations advice received	Technical advisor is satisfied risk to Kea is low, and happy for exemptions to be granted for performance standards 1,4,5 and 6.
Other resources consulted (<i>specify</i>)	Code of practice for aerial 1080 in kea habitat (doc. 2830kb)
Your assessment of technical risks and adverse effects (<i>e.g. the pesticide use, use pattern, site factors</i>)	Operational plan complies with best practice guidelines, so risk of significant non-target native exposure is low. Some death of individual native birds may occur, but the likely incidence of this low and outweighed by effects of reduced predation. Risk to kea is low and technical advisor happy for operation to proceed. <i>Non-Target feral animals:</i> 1080 is well established to have a large impact on rodent and mustelids. While these are non-target species the pesticide is approved for these species and this by-kill will be beneficial for both TB control and native biodiversity. By-kill of deer, which are at high densities in the area is uncertain, but could potentially be as high as the Molesworth operation in 2017 which killed up to 90%. Pen trials indicate repellent additives will significantly reduce this, but as this is the first field trial this is uncertain. <i>Dogs:</i> There is a risk to domestic dogs, as most adjacent landowners have working or companion dogs, however steps have been taken, such as the provision of muzzles to surrounding land owners, and the placement of warning signs at all significant public access locations

	<p><i>Stock:</i> Stock should not be present within the PCL component of the treatment area, and neighbouring land owners/occupiers have been consulted and will be given notice prior to the drop.</p>
<p>Your assessment of non-technical risks (e.g. high public use, consultation outcomes)</p>	<p>Operations manager is confident that consultation conducted has been adequate. The area has a relatively low rate of public use, although some recreational impact will occur to hunters. Potential biodiversity and agricultural gains from pest reduction and TB eradication outweigh this loss of recreational value. Notification prior to drop, signage at access points and carcass and bait monitoring to determine caution period should minimise risk to public and/or dogs and stock.</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>10 months, subject to bait and carcass monitoring</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>The operation complies with performance standards to minimise non-target effects.</p>
<p>How well are other potential risks managed? <i>(i.e. as proposed in the Application form or performance standards)</i></p>	<p>The operation addresses potential human risk, and public health permission has been granted. Water supply areas and high use public areas e.g. rafter campsites to be excluded. All notifications include risk messages for dog owners, including the Pesticides Summary and warning signs. The contractor has offered dog muzzles and emetic pills on request.</p>
<p>Are you satisfied with the proposed warning sign locations and normal points of entry?</p>	<p>Sign locations added at Kahutara Saddle Rd, Acheron confluence launch points, SH1 jetboat access points, Middle Hill carpark</p>
<p>Summary of any technical or community relations advice received</p>	<p>Sought advice from local DOC recreation staff on recreational access points. Four additional sign locations added.</p>
<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></p>	<p>Public health permission sighted.</p>

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>	Tech advisor happy that risk to kea is minimal and Kea performance standard 1 can be waived to allow addition of deer repellent, and standards 4-6 are not applicable to Clarence west ecosystems.
Step 6 Make a recommendation <i>Should the application be approved or declined?</i>	
What key points should the approving manager have drawn to their attention?	Deer repellent additive has not previously been trialled and but it's use is approved by PAG who provided customised performance standard sheet. Iwi were approached, but did not engage in consultation. Areas of the treatment area are classed as kea habitat, although actual kea numbers in the area are very low, and tech advisor satisfied risk is minimal.
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>	
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 example, where the manager decides on different operational timing or warning sign locations or rejects a recommendation to approve or decline the application.</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.

Released under the Official Information Act



Department of Conservation
Te Papa Atawhai

28/06/2019

s 9(2)(a), 9(2)(g)

Vector Free Marlborough Ltd
Private Bag 1007
Blenheim 7240

CC: permissions@epa.govt.nz
Delivery Planner (Biodiversity)

ATTENTION: s 9(2)(a), 9(2)(g)

PERMISSION ID: 5994444

CLARENCE WEST AERIAL TB POSSUM CONTROL

Permission is granted under:

- Section 95A of the Hazardous Substances and New Organisms Act 1996
- Section 50(1) of the Reserves Act 1977
- Section 38(4)(c) of the Conservation Act 1987

for the Director of Vector Free Marlborough Ltd, or any other person acting under his or her authority to aerially apply Sodium fluoroacetate 1.5g/kg Cereal pellets (Pestex) and Sodium fluoroacetate 1.5g/kg Cereal pellets with deer repellent additive (Pestex with Deer repellent) on or after 29/06/2019 until 1/05/2020 on the lands listed below and shown on the **attached maps**:

1. 2192.63 ha of the Conservation Area - Mead Block, a Conservation Area under Section 25 of the Conservation Act 1987
2. 1599.99 ha of the Ka Whata Tu o Rakihouia Conservation Park, a Conservation Park under the Conservation Act 1987
3. 1747.44 ha of Matai Flat Clarence Bend Scenic Reserve, a Scenic Reserve under Section 19 of the Reserves Act 1977
4. 24.54 ha of Tapuae-O-Uenuku Scenic Reserve, a Scenic Reserve under Section 19 of the Reserves Act 1977
5. 44.45 ha of the Marginal Strip - Clarence River, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987
6. 5.19 ha of the Marginal Strip - Jam Stream, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987
7. 4.45 ha of the Marginal Strip - Swale and Ouse Stream, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987
8. 23.74 ha of the Marginal Strip - Mead Stream, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987
9. 2.14 ha of the Marginal Strip - Dee Stream, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987
10. 0.27 ha of the Marginal Strip - Boundary Stream, a Fixed Marginal Strip under Section 24 of the Conservation Act 1987

Non-toxic prefeed may be applied no earlier than 29/06/2019.

I understand this operation is being undertaken for the purpose of controlling Possums in an attempt to eradicate tuberculosis. The permission is given subject to the requirement that the operation:

- Is carried out as described in the Application Form submitted 26/03/2019
- Meets the conditions shown in the attached sheets of DOC Performance Standards for Pesticide Use Number 140
- Meets the conditions shown in the attached sheets of DOC Performance Standards for 1.5g/kg Cereal pellet with deer repellent additive (Pestex with Deer repellent)
- Meets the conditions listed in the National Performance Standards for Pest Operations docdm-1492976

Auditing may occur to establish whether those conditions are being met. If not, the permission will be revoked and further action may ensue.

DOC expects you, your organisation company and any contractors to identify, assess, and manage safety hazards for this work as part of its operational risk assessment or equivalent. At this time DOC is aware of the following specific significant hazards and activities at this site, which may affect your work programme:

- Nil

This advice is subject to change between now and your planned pest control. I recommend that you request an update when you provide us with the twenty-four hour notice for the operation.

s 9(2)(a), 9(2)(g)(ii)

s 9(2)(a), 9(2)(g)(ii)

Director, Operations. Nelson Office

Pursuant to a written delegation from:

- The Environmental Protection Authority under Section 95A of the Hazardous Substances and New Organisms Act 1996
- The Director-General of Conservation under Section 50(1) of the Reserves Act 1977
- The Director-General of Conservation under Section 38(4)(c) of the Conservation Act 1987

Enc: **Map(s) DOC-5994512**
Application Assessment Report (DOC-5900334)
DOC Performance Standards for Pesticide Uses Numbers 140
DOC Performance Standards for Sodium fluoroacetate
1.5g/kg Cereal pellets with deer repellent additive (Pestex with Deer repellent)

National Performance Standards for Pest Operations (DOC-1492976)

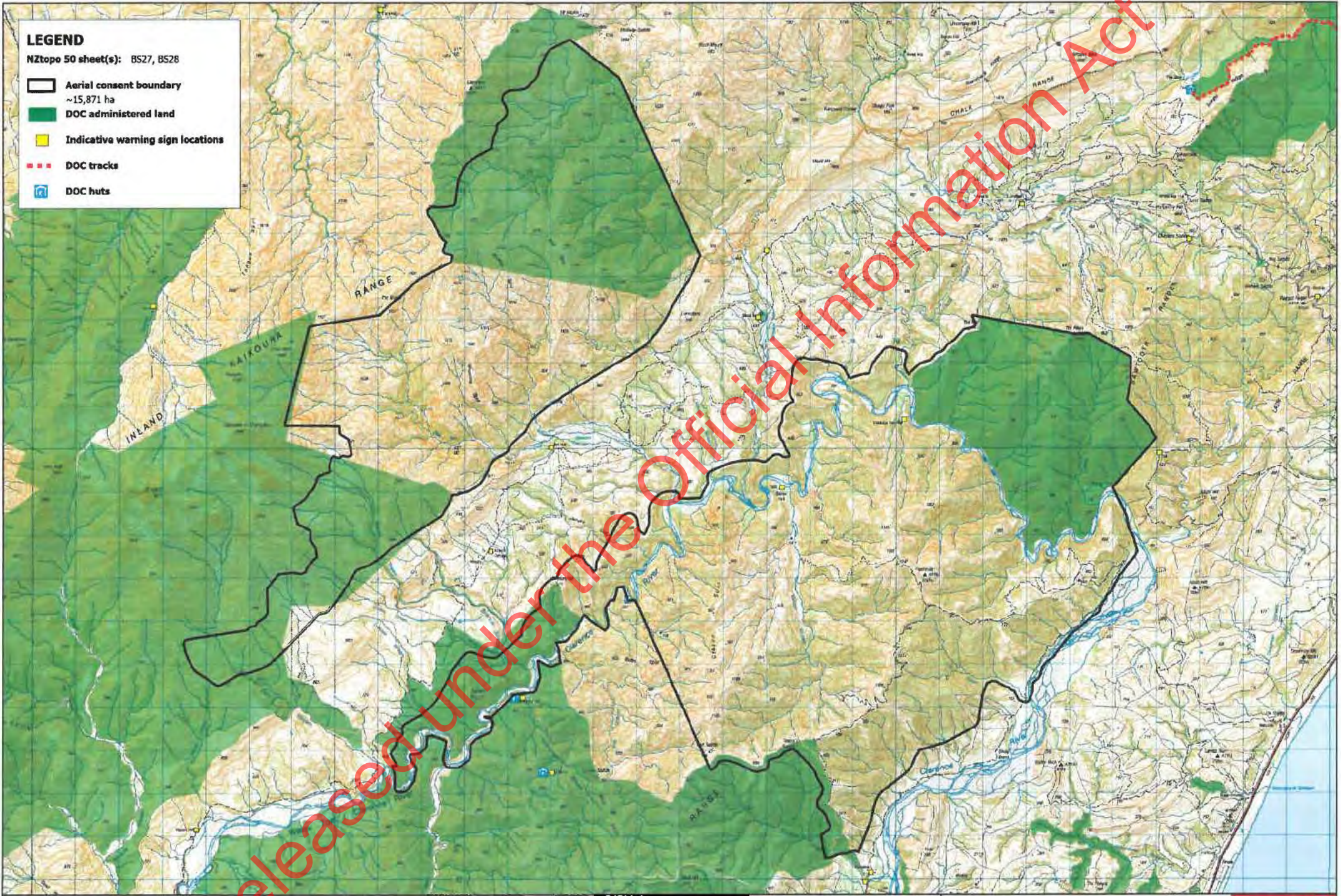
Ref: 5994444

Released under the Official Information Act

LEGEND

NZtopo 50 sheet(s): BS27, BS28

-  Aerial consent boundary
~15,871 ha
-  DOC administered land
-  Indicative warning sign locations
-  DOC tracks
-  DOC huts



2018/19 TBfree NZ Clarence West, Waiautoa & Kekerengu aerial
Map showing consent area vs. indicative warning sign locations

s 9(2)(a)

Imagery sourced from Land Information
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Proj: New Zealand Transverse Mercator
Prepared: 22/03/2019
Scale: 1:75000



♦ INCLUDE ONE SHEET PER PESTICIDE USE ♦ COMPLETE SHADED AREAS ♦

Pesticide Use #140	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pestex)	Target Pests: Possums, Rats
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Location of operation
Clarence West

**Caution Period**

The estimated caution period for this operation is *[assessor to complete]* months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards*Compulsory for **all** operations*

1. For operations targeting rats, prefeed with this pesticide use.
2. The DOC Code of practice for aerial 1080 in kea habitat DOC-2612859 must be followed.
3. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
4. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
5. For operations targeting possums, baits will have a mean size in excess of 6g and 95% of baits should weigh more than 4g.
6. The baits must be dyed green or blue.
7. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
8. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
9. The product must only be used as specified on the manufacturer's product label.

Compulsory for this operation (delete those that you won't be applying to your operation)

10. Bait sowing rate must be no greater than 5kg/ha for 6gm baits (or equivalent bait density per hectare for other bait sizes).
11. Designate a "Safety Officer" on loading site who audits and ensures adherence to safety standards.
12. Use bait sowing buckets with retractable legs.
13. *[Add further standards as required. These could include local performance standards as well as any recommendations from [Current Agreed Best Practice](#) that you want to apply to your operation. Attach conditions from other consents as separate pages.]*

Information Needs*Compulsory for **all** operations*

Nil

Compulsory for this operation

1. *[Add as required.]*

Operational Planning & Design Considerations

- Apply bait in coldest months of year.
- For operations targeting possums, do not repeat aerial operations within 4 years using the same bait.

To include these performance standards as part of your operational plan, attach: conditions from other consents, product label and MSDS.

- Current Agreed Best Practice – Possum Control – Aerial Application of 1080 Cereal Pellets docdm-341728
- Current Agreed Best Practice – Rat Control – Aerial Application of 1080 Cereal Bait docdm-29375

My approval dated [date] is subject to these performance standards being met. Compliance monitoring may occur.

s 9(2)(a), 9(2)(g)

s 9(2)(a), 9(2)(g)

[Name] Director, Operations

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◆ INCLUDE ONE SHEET PER PESTICIDE USE ◆ COMPLETE SHADED AREAS ◆

Trial	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pestex with Deer repellent)	Target Pests: Possums
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Location of operation

Clarence West

**Caution Period**

The estimated caution period for this operation is *[assessor to complete]* months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards*Compulsory for this operation*

1. Prefeed with this pesticide use.
2. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
3. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
4. For operations targeting possums, baits will have a mean size in excess of 6g and 95% of baits should weigh more than 4g.
5. The baits must be dyed green or blue.
6. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
7. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
8. The product must only be used as specified on the manufacturer's product label.

(delete those below that you won't be applying to this operation)

9. Designate a "Safety Officer" on loading site who audits and ensures adherence to safety standards.
10. Use bait sowing buckets with retractable legs.
11. *[Add further standards as required. These could include local performance standards as well as any recommendations from Current Agreed Best Practice that you want to apply to your operation. Attach conditions from other consents as separate pages.]*

Information Needs*Compulsory for this operation*

1. Monitoring: Use both Pestex baits and Pestex with Deer repellent baits at the same bait monitoring site to determine if there is any difference in degradation rate.
2. Monitoring: Non-target native animals found dead in the operational area must be reported to DOC at the time they are found and retained for possible residue testing.
3. Monitoring: Non-target domestic and feral animals found dead within the operational area must be reported to DOC.
4. *[Add as required.]*

Operational Planning & Design Considerations

- Apply bait in coldest months of year.

To include these performance standards as part of your operational plan, attach: conditions from other consents, product label and MSDS.

My approval dated [date] is subject to these performance standards being met. Compliance monitoring may occur.

s 9(2)(a), 9(2)(g)

s 9(2)(a), 9(2)(g)

[Name] Director, Operations

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Internal media advisory

Status: High

Date: 26 March 2019

To: L\SLT, L\Directors, [REDACTED], L\communications and media,
L\DOC media staff, [REDACTED]

From: [REDACTED] communications advisor

Topic: OSPRI report on Molesworth 1080 deer deaths

This advisory is for internal use to inform DOC staff of our media approach

Topic summary

OSPRI is today issuing a media statement and report on a high proportion of deer deaths from its October 2017 aerial 1080 possum control operation on Molesworth.

Manaaki Whenua Landcare Research carried out an aerial deer abundance survey following the operation for OSPRI. The report on this says the survey findings indicate red deer numbers were 88% lower in the 62,000-hectare operational area. This indicates this is the estimated percentage of deer that died from the 1080 operation.

The NZDA also commissioned a survey on the deer deaths but the report on this has not been publicly released yet. Its findings are understood to be similar.

Action required

Media inquiries about this should be referred to OSPRI in the first instance as it was an OSPRI operation and it is an OSPRI report.

We will use our messages below if asked specifically about DOC's role in approving the operation as managers of Molesworth. We intend to decline any media requests for DOC interviews about this.

We also have prepared messages to be used reactively relating to deer by-kill and DOC use of deer repellent. These messages are below.

Please refer any media seeking information from DOC to [REDACTED],
ph [REDACTED]. Media can also email queries to media@doc.govt.nz or call our media number 04 496 1911.

Key contacts

Our messages about DOC's role in relation to approving the Molesworth OSPRI operation can be attributed to DOC South Marlborough Operations Manager [REDACTED]

Please refer any media seeking information from DOC about this to § 9(2)(a), 9(2)(g)(ii)

Media can also email queries to media@doc.govt.nz or call our media phone 04 496 1911.

Key messages

- OSPRI carried out an aerial 1080 possum control operation in Molesworth in October 2017 as part of its programme to prevent the spread by possums of TB to farm livestock, including Molesworth cattle. It covered about 61,000 ha of the 180,787 ha station.
- DOC manages Molesworth as a recreation reserve and we approved the operation in support of OSPRI's TBfree programme and also to support the farming operation on Molesworth that is run by Pāmu Farms of New Zealand (Landcorp Farming Limited) under a lease agreement.
- Aerial 1080 pest control has biodiversity benefits. Possums cause browsing damage to native plants and prey on native birds. Aerial 1080 pest control also reduces rat and stoat numbers.
- It's recognised that recreational hunters value red deer hunting on Molesworth and recreational hunting reduces deer numbers. We enable recreational hunting through issuing hunters with permits that allow them to hunt in specified areas at specified times. Hunters were on Molesworth right up until the operation.
- We're aware OSPRI consulted with the NZ Deerstalkers Association (NZDA) representatives and other hunters about the planned operation before it took place. We are also aware OSPRI worked with the NZDA to identify a part of the operational area where deer repellent was applied to baits with OSPRI funding the additional cost of using deer repellent.
- In response to hunter concerns about the deer deaths, meetings took place involving us and representatives from NZDA, OSPRI, Pāmu Farms, the Molesworth Steering Committee and the Game Animal Council. Discussion took place about why the number of deer deaths was higher than expected and what measures could be taken to avoid a high proportion of deer deaths with OSPRI's planned further possum control on Molesworth.
- A likely significant factor in the estimated number of red deer deaths being higher than expected is that Molesworth has large areas of grasslands and tussock and, with the sparse vegetation, the cereal 1080 baits were more visible to deer.
- The operation was followed by an unusually long dry period and, without enough rain to leach 1080 from the cereal baits, the baits were toxic for longer. Generally, most 1080 is leached from baits after 100–200 mm of rainfall. When residue from uneaten 1080 bait seeps into the soil, microorganisms break it down into non-toxic by-products through biodegradation.
- Actual deer numbers on Molesworth aren't known; we don't monitor deer numbers there. Deer are not found in all areas of Molesworth but only in areas where the habitat is suitable for deer. The report findings in relation to deer numbers and the proportion of deer deaths in the operational area from eating 1080 baits are estimates and not actual figures. There are still deer in other parts of Molesworth.
- We focus our monitoring on threatened native species in Molesworth to protect and preserve them, and on the non-native species that we are actively controlling for conservation purposes, such as wilding pines.
- OSPRI delayed its planned further possum control due to the deer deaths and we don't have an exact date for when it might now occur.
- We will continue to work with the farm management, the Molesworth Steering Committee, NZDA, OSPRI and others to manage pest control work on Molesworth.

General DOC messages about deer by-kill and use of deer repellent.

- We are not targeting deer through our DOC aerial 1080 operations, but we acknowledge some deer eat the bait and are killed through our predator control work.
- We are doing what we can to minimise deer by-kill and avoid disrupting hunters.
- Wherever possible, we time predator control operations to avoid peak hunting periods, when hunters are most actively hunting deer.
- We have also reduced the amount of 1080 bait laid to the lowest level that will control predators (i.e. 1.5. to 2 kg/ ha).
- We use the smallest sized 1080 baits that we can (i.e. 6 gram baits are routinely used rather than 12 gram baits).
- We do not use carrot baits which are highly palatable to deer.
- We also fund the limited use of deer repellent baits at some sites that hunters have identified as important to them. Unfortunately, current deer repellent bait formulations are expensive and hard to use. Applying deer repellent adds roughly \$7 per hectare, or about a 40% increase to the normal bait application cost for controlling rats, stoats and possums on public conservation land. This limits our ability to use deer repellent bait.
- We are working with 1080 bait manufacturers who are developing more effective deer repellent baits. As more cost-effective deer repellent baits become available we expect to use them more widely.
- Deer numbers are generally at high levels, and at many sites deer are having a significant effect through their browsing of native forests and threatened plants. Despite this, DOC is seeking to avoid the unintended by-kill of deer as much as we can.
- The proportion of deer deaths from aerial 1080 operations is highly variable and can depend on a number of factors including some deer species being more vulnerable, the terrain in which the operation takes place, bait size and sowing rates, and how much food is available for deer.
- The exact proportions of deer populations that die as non-targeted by-kill from aerial 1080 pest control operations can't be reliably predicted. Studies indicate that in forested areas without use of deer repellent, it's estimated up to 25-50% of red deer can die and about 30-70% of smaller deer species, such as fallow and sika, that are more susceptible to dying from eating 1080 baits due to their smaller size.
- Molesworth has large areas of grassland so 1080 baits are more visible to deer in this sparsely-vegetated high country terrain than in forested areas where most aerial 1080 control operations take place.
- Although deer by-kill is undesirable, deer populations do breed rapidly, so quickly recover after a 1080 drop. Deer populations breed at roughly 25% per year, so rapidly replace any losses.
- A recently published report of a 4-year study by DOC staff and a Landcare Research researcher found numbers of red deer encounters and sightings were similar in South Westland forest areas treated with 1080 and areas not treated with 1080. This indicates aerial 1080 operations had not compromised the deer hunting experience in the treated blocks.
- The study took place between 2011 and 2015 and involved 865 person days of quarterly surveys across seven blocks of South Westland native forest. Four of the blocks were treated with aerial 1080 before and during the study and three were untreated. The study found the average numbers of deer encounters and deer seen were similar between the treated and untreated areas.

- It also found there were more deer encounters and sightings in the forest blocks treated with 1080 in the 12 months after an operation which could be due to deer behaviour making them more visible. The full report can be found at <https://newzealandecology.org/nzje/3364.pdf>
- We acknowledge some deer herds are particularly valued by recreational hunters. In recent years, DOC has spent up to \$250,000 a year applying deer repellent to 1080 baits for use in a small number of areas where there are herds of special interest to recreational hunters. We have worked with the New Zealand Deerstalkers Association (NZDA) and Game Animal Council to determine where deer repellent will be applied.
- Currently, deer repellent is sprayed on baits after the baits have been manufactured. With handling and logistical costs, this has been relatively expensive which has been a limiting factor in the extent to which deer repellent is used.
- The companies that produce 1080 baits have been developing a new process that incorporates deer repellent into the bait mixture. This is expected to cost less but we don't yet know what the cost will be to us for this bait.
- Animal Control and Veterinary Medicines registration of this new bait formulation is being sought by the companies and it is not yet available for 1080 operations but may become so next year (2020). This bait would be specially produced for use in areas where it has been decided deer repellent would be used.
- We expect to continue to spend up to around \$250,000 annually for use of deer repellent in areas where there are herds particularly valued by recreational hunters. A lower cost for production of baits incorporating deer repellent would enable a total larger area to be treated.
- We will continue to consult with the NZDA executive and Game Animal Council to identify nationally the areas of importance to them for use of deer repellent.
- We are now finalising where deer repellent will be used nationally in this year's Tiakina Ngā Manu – Battle for our Birds predator control programme. We are discussing this with the NZDA executive and Game Animal Council and also with other parties that have an interest in areas where use of deer repellent is being considered.

Released under the Official Information Act

s 9(2)(a), 9(2)(g)(ii)

From: s 9(2)(a), 9(2)(g)(ii)
Sent: Tuesday, 26 March 2019 11:14 a.m.
To: s 9(2)(a)
Subject: FW: 1080 & deer

Hi s 9(2)(a),

Your questions about the Molesworth aerial 1080 pest control and deer deaths are best referred to OSPRI as they carried out the operation. They can also respond in relation to what their representative is said to have said.

This is a statement from us that you can use about our role in approving the operation as managers of Molesworth.

Statement in the name of s 9(2)(a), 9(2)(g)(ii), DOC's South Marlborough Operations Manager:

- An aerial 1080 possum control operation in Molesworth in October 2017 was carried out by OSPRI as part of its programme to prevent the spread by possums of TB to farm livestock, including Molesworth cattle. It covered about 61,000 ha of the 180,787 ha station.
- DOC manages Molesworth as a recreation reserve and we approved the operation in support of OSPRI's TBfree programme and also to support the farming operation on Molesworth that is run by Pāmu Farms of New Zealand (Landcorp Farming Limited) under a lease agreement.
- Pest control also has biodiversity benefits. Possums cause browsing damage to native plants and prey on native birds. Aerial 1080 pest control also reduces rat and stoat numbers.
- It's recognised that recreational hunters value deer hunting on Molesworth and we're aware OSPRI consulted with the Marlborough branch of the NZ Deerstalkers Association (NZDA) and other hunters about the planned operation before it took place. We are also aware OSPRI worked with the Marlborough NZDA branch to identify a part of the operational area where deer repellent was applied to baits to retain deer in this area for recreational hunting.
- In response to concerns about deer deaths from the operation, we agreed to the NZDA monitoring red deer deaths. At this point in time, we don't know the final result of this monitoring.
- We participated in a meeting with representatives from the NZDA, OSPRI, Landcorp, the Molesworth Steering Committee and the Game Animal Council to discuss the OSPRI possum control programme on Molesworth and deer deaths and how the impacts on deer could be reduced in future possum control on Molesworth.
- At this stage, we understand OSPRI has not confirmed when further possum control operations might take place.

Cheers

s 9(2)(a), 9(2)(g)(ii)

Communications Advisor
 Department of Conservation | Te Papa Atawhai
 DDI: s 9(2)(a), 9(2)(g)(ii) | VPN: 5046

Monro State Building
 186 Bridge St Nelson 7010 | Private Bag 5 Nelson 7042

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To work with others to increase the value of conservation for New Zealanders.

From: s 9(2)(a)
s 9(2)(a)
Sent: Tuesday, 26 March 2019 9:48 a.m.
To: Media <Media@doc.govt.nz>
Subject: 1080 & deer

Hi,
I'm a science reporter at Stuff. On Monday, I published the story below on deer responses to 1080 drops in South Westland, linked below.
I'm now getting communications from anti-1080 people and groups. Among those are claims about 1080 drops on Molesworth Station in 2017.
For example, "As for deer and 1080, Landcare Research's opinion is at odds with the 2017 1080 poison drop targeting possum on Marlborough's Molesworth Station where 345 dead red deer were counted from just 10 percent of the poisoned area.
"Last week in Wanaka at a public meeting an OSPRI representative in discussing deer killed by 1080 poison, volunteered the information that 92 percent of deer on Molesworth Station was killed by the October, 2017 poison drop."
Can you provide me with all information and data possessed by DOC on this 2017 1080 drop at Molesworth, especially the data on deer mortality, please.

<https://www.stuff.co.nz/science/111400942/more-deer-encountered-after-1080-drops>

All assistance appreciated,
s 9(2)(a),

s 9(2)(a) Senior reporter & editor of Catalyst, the Monday science page s 9(2)(a) Stuff Ltd, 158

Gloucester St, Christchurch, New Zealand, 8011 Private Bag 4722, Christchurch, New Zealand, 8140

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§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Tuesday, 26 March 2019 12:57 p.m.
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: 1080 & deer
Attachments: MWLCR Molesworth Milestone report.docx

Sure thing – we plan to publish this online along with the media statement.

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Tuesday, 26 March 2019 12:56 PM
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: 1080 & deer

Thanks § 9(2)(a), 9(2)(g)(ii). I'll check it with a few colleagues. Are you able to please provide us with a copy of your report also.
Thanks
§ 9(2)(a), 9(2)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Tuesday, 26 March 2019 12:52 p.m.
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: 1080 & deer

Hi § 9(2)(a), 9(2)

We're just getting final sign off on the attached statement – we hope to send this out later this afternoon.

If you have any immediate comments or concerns please let me know asap.

Regards

§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Tuesday, 26 March 2019 10:47 AM
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
Subject: FW: 1080 & deer

Hi § 9(2)(a), 9(2)(g)(ii)

Just to alert you, the Stuff reporter, § 9(2)(a), who wrote this linked article below about a South Westland study on deer encounters after 1080 pest control is getting emails from people citing the Molesworth deer deaths including this info copied below. He is asking us about it. We will give him the messages below. He will likely come to your team as well for info/comment.

Molesworth Station where 345 dead red deer were counted from just 10 percent of the poisoned area. "Last week in Wanaka at a public meeting an OSPRI representative in discussing deer killed by 1080 poison, volunteered the information that 92 percent of deer on Molesworth Station was killed by the October, 2017 poison drop."

<https://www.stuff.co.nz/science/111400942/more-deer-encountered-after-1080-drops>

- An aerial 1080 possum control operation in Molesworth in October 2017 was carried out by OSPRI as part of its programme to prevent the spread by possums of TB to farm livestock, including Molesworth cattle. It covered about 61,000 ha of the 180,787 ha station.
- DOC manages Molesworth as a recreation reserve and we approved the operation in support of OSPRI's TBfree programme and also to support the farming operation on Molesworth that is run by Pāmu Farms of New Zealand (Landcorp Farming Limited) under a lease agreement.
- Pest control also has biodiversity benefits. Possums cause browsing damage to native plants and prey on native birds. Aerial 1080 pest control also reduces rat and stoat numbers.
- It's recognised that recreational hunters value deer hunting on Molesworth and we're aware OSPRI consulted with the Marlborough branch of the NZ Deerstalkers Association (NZDA) and other hunters about the planned operation before it took place. We are also aware OSPRI worked with the Marlborough NZDA branch to identify a part of the operational area where deer repellent was applied to baits to retain deer in this area for recreational hunting.
- In response to concerns about deer deaths from the operation, we agreed to the NZDA monitoring red deer deaths. At this point in time, we don't know the final result of this monitoring.
- We participated in a meeting with representatives from the NZDA, OSPRI, Pāmu Farms, the Molesworth Steering Committee and the Game Animal Council to discuss the OSPRI possum control programme on Molesworth and deer deaths and how the impacts on deer could be reduced in future possum control on Molesworth.
- At this stage, OSPRI has not confirmed with us when further possum control operations might take place.

s 9(2)(a), 9(2)(g)(ii)

Communications Advisor

Department of Conservation | Te Papa Atawhai

s 9(2)(a), 9(2)(g)(ii)

| VPN: 5046

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s 9(2)(a), 9(2)(g)(ii)

From: s 9(2)(a), 9(2)(g)(ii)
Sent: Thursday, 1 August 2019 11:38 a.m.
To: s 9(2)(a)
Subject: RE: Molesworth deer bykill

Hi Matt

This is a DOC statement in relation to the deer bykill deaths on Molesworth that you can use. It's in the name of DOC South Marlborough Operations Manager s 9(2)(a), 9(2)(g)(ii)

You would need to contact OSPRI about their operations on Molesworth and the research they had carried out on the deer deaths.

- OSPRI carried out an aerial 1080 possum control operation in Molesworth in October 2017 as part of its programme to prevent the spread by possums of TB to farm livestock, including Molesworth cattle. It covered about 61,000 ha of the 180,787 ha station.
- DOC manages Molesworth as a recreation reserve and we approved the operation in support of OSPRI's TBfree programme and also to support the farming operation on Molesworth that is run by Pāmu Farms of New Zealand under a lease agreement.
- Aerial 1080 pest control has biodiversity benefits. Possums cause browsing damage to native plants and prey on native birds. Aerial 1080 pest control also reduces rat and stoat numbers.
- It's recognised that recreational hunters value red deer hunting on Molesworth and recreational hunting reduces deer numbers. We enable recreational hunting through issuing hunters with permits that allow them to hunt in specified areas at specified times. Hunters were on Molesworth right up until the operation.
- We're aware OSPRI consulted with the NZ Deerstalkers Association (NZDA) representatives and other hunters about the planned operation before it took place. We are also aware OSPRI worked with the NZDA to identify a part of the operational area where deer repellent was applied to baits with OSPRI funding the additional cost of using deer repellent.
- In response to hunter concerns about the deer deaths, meetings took place involving us and representatives from NZDA, OSPRI, Pāmu Farms, the Molesworth Steering Committee and the Game Animal Council. Discussion took place about why the number of deer deaths was higher than expected and what measures could be taken to avoid a high proportion of deer deaths with OSPRI's planned further possum control on Molesworth.
- A likely significant factor in the estimated number of red deer deaths being higher than expected is that Molesworth has large areas of grasslands and tussock and, with the sparse vegetation, the cereal 1080 baits were more visible to deer.
- The operation was followed by an unusually long dry period and, without enough rain to leach 1080 from the cereal baits, the baits were toxic for longer. Generally, most 1080 is leached from baits after 100–200 mm of rainfall. When residue from uneaten 1080 bait seeps into the soil, microorganisms break it down into non-toxic by-products through biodegradation.
- Actual deer numbers on Molesworth aren't known; we don't monitor deer numbers there. Deer are not found in all areas of Molesworth but only in areas where the habitat is suitable for deer. There are still deer in other parts of Molesworth.
- We focus our monitoring on threatened native species in Molesworth to protect and preserve them, and on the non-native species that we are actively controlling for conservation purposes, such as wilding pines.
- We will continue to work with the farm management, the Molesworth Steering Committee, NZDA, OSPRI and others to manage pest control work on Molesworth.

Cheers

s 9(2)(a), 9(2)

From: s 9(2)(a), 9(2)(g)
Sent: Thursday, 1 August 2019 11:12 a.m.
To: s 9(2)(a)
Subject: FW: Molesworth deer bykill

Hi s 9(2)(a),

I'll get back to you on this probably later today once I've been able to catch up with our manager responsible for Molesworth.

Cheers

s 9(2)(a), 9(2)(g)(ii)
Communications Advisor
Department of Conservation | Te Papa Atawhai
s 9(2)(a), 9(2)(g)(ii)

Monro State Building
186 Bridge St Nelson 7010 | Private Bag 5 Nelson 7042

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From: s 9(2)(a) | Marlborough Media <s 9(2)(a)>
Sent: Thursday, 1 August 2019 10:49 a.m.
To: Media <Media@doc.govt.nz>
Subject: Molesworth deer bykill

Hi DOC media team,

The Marlborough Deer Stalkers Association released a study today claiming by kill numbers of deer in the Molesworth Station are much higher than anticipated.

Is the Department of Conservation concerned about higher than expected by kill numbers with the use of 1080?

Does the ability for hunters to continue their sport factor into the department's pest control strategy?

Does DOC consider the white tailed deer on Molesworth Station a pest?

View the study here ->

https://www.deerstalkers.org.nz/st_control_operation_on_Molesworth_Station_in_2017.pdf?fbclid=IwAR1GRxAWwMY6SbF4DcLpBFjNEtHjCsvGjWE8ily6Ybogs4wzHeQdYlrVow

Thanks,

s 9(2)(a)

s 9(2)(a)

REPORTER

P.
M.

s 9(2)(a)

A. 52 Scott Street, Blenheim

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§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 9:44 a.m.
To: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: Clarence deer deaths

Hi everyone

We're getting quite a few comments and questions coming at us on social media about the Clarence operation and claims of deer deaths. Are there any details you can give us to assist in responding with factual info. I'm told questions are particularly being asked about the claim that the baits were four times stronger than usual.

Or are you able to put something factual out through social media?

It would be helpful to be able respond given we are being targeted with comments as well as you.

Thanks

§ 9(2)(a), 9(2)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Thursday, 15 August 2019 1:43 p.m.
To: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: Clarence deer deaths

Hi § 9(2)(a), 9(2)

We're aware of this and will prepare a reactive statement if contacted by media. We'll share this with you in advance.

Cheers

§ 9(2)

From: Trish Grant <tgrant@doc.govt.nz>
Sent: Thursday, 15 August 2019 12:18 PM
To: § 9(2)(a), 9(2)(g)(ii)
Subject: Clarence deer deaths

Hi § 9(2)(a), 9(2)(g)(ii)

You may be aware of this post below being shared on Facebook. I'm not sure how correct it is. It would be good to be aware of any statements you put out in relation to this.

Just had word that the Clarence drop has been completed..its been a complete disaster The 20 collared deer have all died. The baits are apparently 4x as strong as usual. The Deer Repellent has failed.. I have been told by a very good source that Thousands of Deer are dead, in fawn..so they'll be dead too.. Ospri and DOC you both have alot to answer for, over this drop. This is Molesworth all over again but worse."

Cheers

§ 9(2)(a), 9(2)(g)(ii)

Communications Advisor
Department of Conservation | Te Papa Atawhai
DDI: § 9(2)(a), 9(2)(g)(ii)

Monro State Building
186 Bridge St Nelson 7010 | Private Bag 5 Nelson 7042

Kia piki te oranga o te ao tūroa, i roto i te ngātahitanga, ki Aotearoa.
To work with others to increase the value of conservation for New Zealanders.

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§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 11:59 a.m.
To: § 9(2)(a), 9(2)(g)(ii)
Subject: FW: Clarence River operations - key messages

Thanks for this § 9(2)(a), 9(2)(g)(ii) didn't include me in the DOC people to send it to but you probably intended to send it to me and please do. Our South Marlborough team that manage the Clarence will need to know the details too.
Thanks

§ 9(2)(a), 9(2)(g)(ii)

Communications Advisor
Department of Conservation | Te Papa Atawhai
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From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 11:53 a.m.
To: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: Clarence River operations - key messages

Awesome – thanks so much § 9(2)(a), 9(2)(g)(ii)

§ 9(2)(a), 9(2)(g)(ii)

Communications and Engagement Manager, Predator Free 2050 | Customer Engagement Unit
Department of Conservation | Te Papa Atawhai

§ 9(2)(a), 9(2)(g)(ii)

Conservation House, 18-32 Manners Street, Wellington.
www.doc.govt.nz



TE WIKI TIAKI AO TŪROA 14-22 MAHURU

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conservationweek.org.nz



§ 9(2)(a), 9(2)(g)(ii)

Sent: Friday, 16 August 2019 11:52 a.m.
To: § 9(2)(a), 9(2)(g)(ii)

Cc: § 9(2)(a), 9(2)(g)(ii)

Subject: RE: Clarence River operations - key messages

Hi § 9(2)(a),

Yes, we're aware of this and are currently finalising a statement/key messages. Will send this through once approved by our CE.

Will try and get this through to you asap.

Regards

§ 9(2)(a), 9(2)(g)(ii)

CORPORATE COMMUNICATIONS MANAGER

§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)

Sent: Friday, 16 August 2019 11:32 AM

To: § 9(2)(a), 9(2)(g)(ii)

Subject: Clarence River operations - key messages

Kia ora korua,

We've had a fair bit of comment on our social media sites overnight about the deer that have been reportedly killed from the OSPRI Clarence River operation. No doubt you've been getting similar comment. So, we wondered if you could share any key messages you've developed around this matter? They'll be helpful for us in responding to comments on social and if we're asked for comment by media.

I'm going to be away from the office this arvo, but if you could copy § 9(2)(a), § 9(2)(g)(ii) (our Social Media Team Leader) and § 9(2)(a), 9(2)(g)(ii), our Comms and Media Manager and myself in your reply, that would be really appreciated.

Ngā mihi nui,

§ 9(2)(a),

§ 9(2)(a), 9(2)(g)(ii)

Communications and Engagement Manager, Predator Free 2050 | Customer Engagement Unit
Department of Conservation | *Te Papa Atawhai*

Cell: § 9(2)(a), 9(2)(g)(ii)

Conservation House, 18-32 Manners Street, Wellington.

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§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 2:26 p.m.
To: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: Clarence River operations - key messages

Thanks § 9(2)(a), 9(2)(g)(ii). Much appreciated.
Cheers
§ 9(2)(a), 9(2)(g)(ii)

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 2:00 p.m.
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
Subject: RE: Clarence River operations - key messages

Hi all

Please see below our statement now on our website. Will shortly post on FB.

<https://ospri.co.nz/news-and-events/news/clarence-valley-deer-repellent-trial-update/>

If you have any further questions please let me know.

Regards

§ 9(2)(a), 9(2)(g)(ii)
CORPORATE COMMUNICATIONS MANAGER
§ 9(2)(a), 9(2)(g)(ii)

MEDIA RELEASE

16 August 2019

UPDATE ON CLARENCE TBFREE DEER REPELLENT TRIAL

A TBfree disease control operation in the Clarence Valley was successfully completed earlier this month. The operation is part of the TBfree programme’s goal to eradicate TB from New Zealand cattle and deer herds and also wildlife.

As part of the aerial 1080 possum control operation, a project to test a new deer repellent was also conducted. A factsheet about the trial is [available here](#).

The trial used standard 6-8g cereal baits in one area of the operation, and standard 6-8g cereal baits treated with deer repellent in a comparison area. The trial compares the efficacy of the repellent in limiting deer by-kill during the operation targeted at possums.

Key points about the trial:

- Initial indications are that in the area treated with deer repellent, 50 percent of the deer survived the operation.
- In comparison, the area with no deer repellent all radio collared deer died.

- Wild deer deaths are expected during possum control operations, exact numbers cannot be confirmed yet.
- Because the trial is still underway a final result won't be available until researchers submit a full assessment of the trial.
- The deer repellent trial used standard 1080 cereal baits, contrary to some social media commentary.

The result of the deer repellent trial will be reported later in 2019.

From: § 9(2)(a), 9(2)(g)(ii)
Sent: Friday, 16 August 2019 11:32 AM
To: § 9(2)(a), 9(2)(g)(ii)
Cc: § 9(2)(a), 9(2)(g)(ii)
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Ngā mihi nui,

§ 9(2)(a),

§ 9(2)(a), 9(2)(g)(ii)

Communications and Engagement Manager, Predator Free 2050 | Customer Engagement Unit
Department of Conservation | *Te Papa Atawhai*

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