



**NZDFA**

New Zealand Deer Farmers' Association

***ERMA New Zealand.  
PO Box 131  
Wellington.***

***SUBMISSION: Application code HRE05002***

*The use of 1080 for pest control: Application for reassessment of the vertebrate toxin sodium fluoroacetate (1080) and substances containing 1080. Application for continued use for the control of possums, wallabies and rabbits and for targeted by kill of rodents and mustelids.*

This submission is made by the New Zealand Deer Farmers Association Incorporated. Contact person: Andrew Mitchell, Chairman Executive Committee, NZDFA Tony Pearce, Producer Manager , Deer Industry New Zealand	
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Application No: HRE 05002
Application by: NZDFA Executive Committee
To: A reassessment of 1080.

**Submission Summary:**

**Decision sought.**

The New Zealand Deer Farmers Association thanks ERMA and the applicants AHB and DOC for the opportunity to make a submission and endorse the need and justification as presented in the application documentation to reassess the role of 1080 as a vertebrate toxin and support its continued use for the planned vertebrate control of possums, wallabies and rabbits and targeted by-kill of rodents and mustelids pursuant to section 63 of the Hazardous Substances and New Organisms (HSNO) Act 1996.

**The NZDFA wishes to be heard in support of this submission at a public hearing.**

## **Reasons for a supporting submission.**

1. The New Zealand Deer Farmers Association (NZDFA) supports the use of 1080 for bovine tuberculosis (bovine Tb) vector control and eradication. The viability of the current bovine Tb pest management strategy under the National Pest Management Strategy (NPMS) relies on the availability and considered planned use of 1080 to the Animal Health Board (AHB) to undertake cost effective bovine Tb vector control including aerial and ground application.
2. NZDFA supports the planned, considered and controlled use of 1080 to conserve New Zealand's native forests, plants and animals from a conservation stand point and believes this issue will be ongoing after the targets of the NPMS have been reached.
3. Tb control is a critical issue to all deer farmers for the continued viability of our industry but more importantly it is a pastoral issue and it is a conservation issue as well and in the widest sense a NZ issue.
4. The recent success (~31 Tb Infected Deer herds June 2006) down from 73 in 2004 and from a peak of 167 in 1996 as the NPMS was initiated. These herds are intimately associated with identified vector risk zones in both the NI and SI. Control and eradication of TB deer herds in these areas is indisputably linked to the tools and management of the vector control programmes associated. These must be preserved at all costs to achieve Tb freedom for the deer industry.
5. Deer farmers have embraced principles of land sustainability and preservation and protection of native bush, waterways etc. Maintaining these areas free of reservoirs of pests from both disease and the sustainability aspect is important to our industry. 1080 use in these preserved areas is often the most timely and expedient control measure.
6. 1080 is a scheduled poison. As such NZDFA supports that its application should be controlled and minimised to those instances where there are no other viable options and 1080 is deemed to be the most effective solution by the expertise involved in delivering contract services for AHB and DoC and other agencies.
7. NZDFA supports AHB initiated and other research programmes that seek alternative environmentally acceptable and humane toxins or acceptable biological control programmes in that vector control effort that may in time be used as effective alternatives to 1080 in many situations.
8. The reassessment application from AHB and DoC comprises a hazard classification of 1080 and an assessment of the risks, costs and benefits of using 1080 in New Zealand. The risk assessment has demonstrated significant benefits from the use of 1080. The NZDFA supports those conclusions and recognised risk based cost/benefit assessment as stated in the application summary)

10. The risk assessment demonstrates that there are significant benefits to the environment, market economy and community from the continued use of 1080. Under the current stringent controls on the use of 1080 there are no significant adverse effects on the environment or human health although the DFA accepts that there is a risk of by kill of valued species and an ongoing risk to domestic dogs in this. Without the continued use of 1080 for Tb control and conservation purposes, the most likely alternative control option would be an increased use of cyanide baits and traps. This would lead to a reversal of hard-won gains in Tb control and less protection for native ecosystems and threatened native species.
11. The New Zealand cattle and deer industries, in partnership with Government, have invested approximately \$588 million in the bovine Tb NPMS since 1997/98. If changes to the use controls for 1080 were such that the long term objective of the bovine Tb NPMS was no longer achievable, this significant investment would be wasted.

### **Elaboration of Key Issues**

The AHB has a clear role in achieving the targets outlined in the NPMS – to achieve official freedom from bovine Tb (less than 0.2% infected herds) by 2013. This will ultimately protect our pastoral export base and economy. Possum control operations geared towards this objective will eradicate Tb from wildlife over large areas, improve recreational hunting in the long term, and will generate major conservation benefits.

1. 1080 is the only vertebrate poison registered for aerial broadcast in New Zealand. As such it is an important tool in possum control operations carried out by the AHB and DoC, especially in those areas that are not easily accessible.
2. Control of possums (and for mustelids as well) is critically important to the success of the NPMS as they are the major wildlife reservoir and vector of bovine Tb, which can be a serious health problem in farmed cattle and deer as well as having the potential to be of human health concern.
3. It is well established that the risk of vector spread of Tb by possums is a serious causative link to the spread of Tb in farmed deer herds in vector risk areas.
4. Successful interruption of that link is created by rapidly reducing possums to very low densities and maintaining that for a prolonged period (>5 years). In many parts of New Zealand, aerial application and targeted programmes of 1080 application are the only practical and cost effective means to do this.

Of the 31 infected deer herds as at June 2006 all exist in Vector Risk Areas

Vector control programmes are positively associated with control and decline of Tb in farmed deer herds

5. New Zealand's cattle and deer herds have had a high rate of bovine Tb relative to our trading partners. The disease has the potential to be used as a barrier to our exports of beef and venison products. This could have serious impacts on

the general economy as well as direct impacts on the businesses of NZDFA members and all the deer industry stakeholders.

6. Detection and assurance of Tb freedom in exported venison is the major driver of the expensive (~\$9.00/head) carcass inspection services conducted by NZFSA at the industry's Deer Slaughter Plants. This is a further substantial investment by deer farmers, who are committed to the elimination of Tb and its associated vectors... While there are a number of risks recognised associated with the ongoing use of 1080, in the absence of availability of other equally effective and cost effective control mechanisms, these *perceived* risks must be weighed against the *proven* benefits that 1080's continued availability provides.
7. Where it is used, this should be done by appropriately trained and skilled operators using appropriate equipment and systems that minimise unwanted impacts.
8. It is recognised that there are potential unintended negative impacts on the non-farming sections of society that occur due to the use of 1080, but these must be weighed against the positive impacts and potential impacts 1080 use has on both the economy and the environment in the achievement of its main aim, ie targeted pest and vector control associated with Tb eradication and environmental protection.
9. As 1080 is able to be safely aerially broadcast, it is currently the only cost effective tool available for a large proportion of the bovine Tb vector control operations carried out against possums in New Zealand. Without this tool the viability of the pest management strategy would be questionable. As such the NZDFA strongly supports the ongoing availability of 1080 for this purpose.
10. However it is essential that research should continue into the development of equally effective but more targeted possum control methods as part of a long term strategy to reduce our ongoing major reliance on 1080.
11. The deer industry notes recent advances in application of baits that utilize deer repellent that are attributed with some success in deterring feral deer in Tb disease free areas from eating 1080 baits. The AHB has supported substantial research in this area. These proactive approaches have allowed some support for the hunting lobby use and control of a deer resource while allowing possum vector control to continue successfully in specific areas
12. As a welcome side issue the ongoing development of (fish product based) deer repellent baits has resulted in these being an attractant for mustelids reportedly resulting in increased control measures in these major disease risk vectors to farmed deer in some areas.
13. There are comprehensive and rigorous systems of regulations and operating procedures that govern 1080 use in New Zealand. The application summary states it is managed in compliance with HSNO Act regulations covering packaging, transport, emergency management, handling, storage and application.

There are further controls on its use under the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997.

Only persons holding an Approved Handler Test Certificate and a Controlled Substance License are allowed to apply 1080. Local authorities may impose controls on 1080 application under the Resource Management Act.

There are also strict codes of practice covering 1080 operating procedures developed by AHB and DOC. These incorporate experience in risk management and best practice built up over four decades of using 1080 in New Zealand.

14. The importance of that is relevant to the industry in relation to the potential for feral venison trade. The feral venison trade was suspended over an alleged risk of 1080 contamination of a feral game shipment to Europe in 2002. While that was unproven the potential of risk and negative international reaction to 1080 use in vector management is clearly an issue that requires robust systems of assurance and protection. That activity has resumed under a formal NZFSA approved code of operations. The NZDFA believes that the agreements reached on control, reporting of killed game harvest sites and GPS logging by helicopter operations are robust and give assurances required in relation to assurance of nil 1080 contamination risk.
15. Equally the use of deer repellent 1080 baits may also compromise supported principles of environmental preservation if wild deer populations are encouraged to expand because of the use of this product. We submit there is balance in eliminating disease in primary vectors, controlling deer populations for environmental sustainability grounds and balance in enhancing a recreational or feral recovery game resource.
16. Notwithstanding, the importance of the need for use of 1080 (in the NPMS and in environmental protection and the sustainable future of New Zealand's heritage flora and fauna) is strongly endorsed by the NZDFA in the interim period as more targeted control methods are researched and developed.

## **Conclusions**

The benefits of the NPMS programme are maximised, and the downsides minimised, if the AHB can undertake the work of vector eradication for Tb control work in the fastest and most efficient manner possible. Sensible and prudent use of aerial 1080 application is key to this. The NZDFA believes that the AHB recognises both the benefits and risks of the use of 1080 and other toxins. The aim with any toxin use is to ensure safe, efficient operations with minimal adverse impact on valued non-target species.

The economic reasoning, along with the enhancement of conservation and biodiversity values that is achieved through possum control on the conservation estate, means it is important for New Zealand to retain the ability to use 1080 in a manner appropriate to our specific needs and conditions.

The New Zealand Deer Farmers Association Fully supports the application for reassessment of 1080 as a vertebrate toxin and its ongoing use for both Tb Vector s control and as a tool to assist in environmental protection through the elimination of targeted pests as defined. We support other members of the pastoral sector in their encouragement of the AHB and DoC application for formal reassessment of 1080 and providing a forum for identifying the full range

of views and concerns on this issue. It is gratifying that such support is also shared by Regional Councils, key conservation groups and New Zealand citizens concerned for the long term welfare and future of their environmental heritage and health of the pastoral production sector.

On Behalf of the NZDFA,

AJ Pearse  
Producer Manager  
Deer Industry New Zealand  
17<sup>th</sup> January, 2007

***Note 1) The New Zealand Deer Farmers Association***

- 1 The New Zealand Deer Farmers Association represents 2150 voluntary subscription paying levy paying members of an estimated 3800 currently active within the broad administrative framework of Deer Industry New Zealand and represents the majority of farmed deer in New Zealand.
- 2 It is a fully Incorporated Society that promotes the views and interests of the producers at all levels and is lead by an Executive Committee of 4 including the Chairman. An executive responsibility is now assumed by its Producer Executive within Deer Industry New Zealand
- 3 The Association is regionally located through its 24 Branches and 3 Breed Societies and has a strong relationship with regional councils, related agricultural industries and its own industry relationships.
- 4 Each Branch annually appoints a deer farmer to the local Regional Animal Health Committee (RAHC) of the Animal Health Board. The Issue of Tb eradication and support for the NPMS is central to all of the NZDFA branch functions at local and national level.