



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.

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| This submission is made by the | | Branch of New Zealand Deer Farmers | |
| Association Incorporated. | | | |
| Contact person: | | | |
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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.

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| The NZDFA wishes/ Does not wish to be heard in support of this submission at a public hearing. |
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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.

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 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

Branch NZDFA,

Chairman.