

APPLICANT'S RESPONSE

25th May 2007

Good evening

My name is John Ombler and I am the General Manager of the Research Development and Improvement Division of the Department of Conservation

I am also a keen deer stalker - and have been for many years, and I am every bit as passionate about hunting as those who have stood before you!

Mr Chairman, I know that you and the rest of the ERMA Committee have had a hard couple of weeks on the road - ERMA's biggest and longest hearing's process ever - so I will try to be mercifully brief.

This is actually my last day in the department, and indeed this is my final official duty. I can't think of a better way to conclude my 32 year career in conservation than having the chance to emphasise again, in this very important forum, the crucial importance of 1080 in the protection of our native ecosystems and species.

But first let me say that this demanding ERMA process has already been, in an important sense, a success. What our staff in the Applicants team tell me is that the hearings have been conducted in a very open and respectful manner and have provided a great forum for promoting full and frank discussion and dialogue about this toxin.

So the way you have held these hearings should have reassured even the most passionate anti-1080 advocate, that the integrity of this public process has been fully upheld. Because it is not just where we end up that is crucial, but how we get there that is also of vital importance.

When your Committee withdraws from public gaze to consider its decision you will be weighing up a great deal of evidence. In addition to the Applicants' material and the Agency's detailed E and R Report, you will also have the richness and diversity of opinion and information supplied by submitters.

From the perspective of the Department of Conservation I would like to leave you with a few key points for your consideration.

We have argued from the outset that the benefits of continuing to use sodium fluoroacetate, or 1080 as everyone calls it, **far** outweigh the adverse effects and associated risks.

In terms of the HSNO Act that will guide your decision-making, we cannot emphasise too strongly that the use of 1080 is vital to ensure the sustainability and indeed the very survival of many of our native plant and animal species. I am referring, of course, to the touchstones under Part II of the Act.

Let me give you just one example in relation to 1080 use for protecting native species. You heard in the opening address by our Director-General, Al Morrison, of the recent successes in our pest control work in Tongariro Forest.

Using 1080 cereal baits, with pre-feed and aerial distribution, the latest monitoring results show that kiwi survival to fledgling is at least 60%, as distinct from 8% in the non 1080 areas, and that numbers of possums, stoats and rats were very significantly reduced. With one aerial application of 1080 we were able to control **three** crucial pests in this forest that all threaten the survival of kiwi

We have nothing else in our toolbox of control methods that allows us to be so effective with just one single toxin. And it is not only diminishing kiwi populations that can benefit from well planned, carefully managed, 1080 operations.

The dismal, downward slide in numbers of our threatened kereru, kokako, kaka, mohua and kakariki populations has been slowed or even reversed by the ground and aerial use of 1080 in specific places. In some cases, kereru breeding rates have gone from zero percent to over 40% after aerial 1080 operations.

At a much smaller scale, the use of 1080 feral cat baits in bait stations is playing a critical role in the survival of the Southern New Zealand Dotterel

Gone from the South Island, by 1992 it was down to a precarious low of just 62 birds that survived only on the alpine tops of Stewart Island. Thanks largely to the use of these 1080 bait stations, Dotterel numbers have now increased to 253. Still too few, but we are heading in the right direction.

I've been told that you have heard from many concerned submitters over the past two weeks about the increasing silence within our forests. Where is the birdsong? What has so diminished the dawn chorus? The midnight calls of kiwi?

The anti-1080 advocates point to aerial 1080 operations as the cause, but all the monitoring and research results point the blame elsewhere. If it was 1080, then we would find lots of dead birds after aerial operations. So for many years now Departmental staff have been monitoring 1080 aerial operations.

The painstaking radio-tagging of over 250 birds from nine threatened species and monitoring them before and after various aerial 1080 operations found that only two died from poisoning - a morepork and a weka. All the rest survived. Over 80 kiwi have now been monitored with radio transmitters through several aerial 1080 operations. All have survived.

So it is not 1080 that is silencing our forests. It is the silent killers that are responsible - the stoats, rats and possums - aided by feral cats and dogs. While we can, in hindsight, rue the shortsighted decisions that introduced these species, our dubious legacy is to have to try and rectify the consequences.

These consequences can be daunting. They include the loss of extensive forest canopy in both the North and South Islands caused by extensive possum browse.

Or the consumption of flowers and fruits by possums, as well as possum predation of invertebrates – all essential food items for nesting native birds. And direct predation by stoats, rats and possums on native birds and their eggs.

Competition and predation have, for example, led to alarming declines in kokako and kereru numbers. And the result? Fewer individuals are left of these key bird dispersers of the fruits and seeds of important forest trees

In combination then, we are faced with not only a threat to the sustainability of individual species, but also to the life-supporting capacity of native ecosystems. This brings economic risks. Healthy ecosystems underpin much of New Zealand's tourism sector. They also provide quality recreational experiences, and supply valuable services for primary producers, for example, through their roles in purifying and regulating water flows, reducing flood and erosion damage and building up soils

To meet its statutory responsibilities for protecting species and ecosystems and managing a wide range of pests, the Department has developed, and continues to refine, a wide range of tools and techniques to achieve its objectives. These include new traps, new lures, new toxins and smarter ways of using them.

Yet 1080 is, and will remain, a vital tool in our existing toolbox. It is the key for effective control of New Zealand's number one pest, the possum, both for biodiversity protection and eradication of bovine Tb.

And as I mentioned earlier, the aerial application of 1080 is uniquely able to reduce both possum populations and rat populations through eating baits, along with stoats who feed on the poisoned carcasses.

However, with the use of any toxin comes risks, and the obligation to manage those risks. When a toxin is spread by air the risks to non-target species increase, and so do the obligations to meet even higher standards of risk management.

The applicants accept that responsibility in full. During the last 2 weeks, you and many submitters have questioned how the agencies manage those risks. In response, the applicant's team has provided you with additional information, including a presentation on how Departmental aerial 1080 operations are managed in South Westland.

The team has described the significant improvements that have been made over the last 30 years; in managing the risks in carrying out operations; 10-fold reductions in the amount of 1080 applied per hectare bringing reduced risks to non-target species; improved delivery technology; improvements in baits.

We are committed to a philosophy and practice of continuous improvements, not just in operational effectiveness, but equally importantly in reducing risks associated with the use of 1080 still further. I'd particularly mention our commitment to reducing risks to non-target species and for the protection of public health.

I was struck by the submission by the Medical Officers of Health which emphasised that public health is directly related to the health of the environment within which people live, rather than focusing only on their important role in setting conditions for 1080 operations and monitoring them.

That commitment to continuous improvements goes hand in hand with efforts to find *alternatives* to 1080 – a call that has been made throughout these past 2 weeks by many submitters and by the Committee.

We have heard that message, loud and clear. The research effort that has already gone into developing new traps, new toxins, and the basic research into bio-controls via biotechnology, has been underway for many years.

And as you heard from Dr John Hellstrom the former chair of the Biosecurity Council: "solutions using biocontrols are always just ten years away and have been for the past twenty years!"

While the search for alternatives will continue it is clear that there is no method just around the corner, with the benefits that we currently get from 1080.

But I must stress that the call for 'alternatives' implies that 1080 is the only tool we currently use or that we are stuck in a kind of either/ or situation which simply doesn't correspond to reality. Because the salient fact is that we need every tool we can lay our hands on and we welcome alternatives, but not at the expense of 1080.

Let me turn, before closing, to important matters to do with public consultation, in the context of possum control operations, especially those involving aerial 1080 use.

Both the Department and AHB, along with regional councils have stated to you the importance they attach to good and effective consultation with Maori and with local communities and other interest groups. At your request, we have tabled a paper with the Committee that details the extensive consultations that go on between DOC Conservancies and iwi, hapu and Maori Trusts when 1080 operations are being planned.

While we believe that the consultation practices that have been developed with Maori are robust, we recognise that the message coming from Maori submitters is that they are looking for an engagement that is deeper, more holistic and more involving of Maori from the early stage of planning pest control operations that involve 1080.

This message includes a call for more research into possible effects on particular taonga species and active protection of Maori relationships with their particular taonga species and places.

However, while we are very happy to have appropriate consultation frameworks, please do not cripple us with consultation and consent requirements which make it impossible to use 1080 in practice.

As well as these issues, there may well be other matters that we could explore and advance in a different setting. Perhaps the mechanism that exists under the HSNO Act for developing 'codes of practice' offers a way forward within which the applicants and regional councils could engage with Maori in responding to their concerns.

This could also be a useful mechanism for addressing calls for tighter controls over contractors, especially those involved in aerial application.

In conclusion, the heartening aspect of this reassessment process, is that all those who have participated have a common vision for protecting the species and places that are unique and special to us all as New Zealanders.

But as yet, we don't have a shared and agreed understanding as to how to get there.

That is the challenge before you and your fellow commissioners.

