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29 May 2007

Neil Walter and ERMANZ 1080 Panel
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Greetings Neil and Panel

Re ERMA's Friday 25 May Hearings – Urgency and DOC Maps

NZDA comments on Urgency and DOC Maps below from last Friday's very interesting, and productive 1080 hearings.

Summary:

1 DOC's maps of 1080 use on land it administers shown Friday, grossly under-show the area 1080-ed. NZDA asks to directly discuss these maps with the Panel.

2 The need for urgency question posed by Manuka Henare is with NZDA and other opponents of 1080, not with AHB/DOC. Our urgency concerns include **curtailing some aerial 1080 operations this winter**, and also about the current and 150% increase AHB plans for its aerial 1080 on public land significant for deerstalking.

This major future AHB increase, will give expected high deer by-kill and slow herd recovery times as discussed in submissions. This can significantly curtail recreational deerstalking. NZDA asks ERMA to require **DOC mitigation to keep deer by-kills at least below 10%** on all public land aerial 1080 operations, where recreational deerstalking is significant, and deer are not targeted.

There is also an urgent need to have **all aerial 1080 operations publicly notified**, and made controlled uses. ERMA needs urgently to assess **New Zealand's obligations from the Johannesburg Summit 2002**, to reduce toxin use. In contrast AHB plans a major increase (150%) in aerial 1080 use.

3 NZDA has supplied ERMA with a book on significant recreational hunting areas in NZ.

1 DOC Maps of public land with aerial pest management underestimate the area treated:

DOC put forward these maps, after Nick Hancock's presentation at the start of Friday's hearings. I questioned them. They claimed to show the area of possum control on public land that is in the deer range. This includes aerial 1080 used on public conservation land.

NZDA has now seen a hard copy of these maps. It is clear **DOC has significantly underestimated the areas treated on public land**. Many AHB/Reg Council operations do not appear to be included.

One large area that did not appear to be there were the 55,000 Ha drop last winter over Southern Urewera and Whirinaki forests. Another was the 83,000 Ha Hauhungaroa Ranges drop of Winter 2005, over the Pureora Forest Park, and King Country lands to the west of it.

According to Table 4 of the Application (page 40) AHB 1080 aerial and ground ops control 400,000 Ha annually (7.4%, of their total control). Assuming a five-year rotation, this is 2 million Ha. NZDA estimates between 80 and 90% of this is public land.

DOC and Regional Councils (separate from AHB) aerial 1080 about 200,000 Ha annually, or over a six year rotation, 1.2 million Ha. Almost all of this is public conservation land. This makes **2.8- 3 Million Ha of public conservation land under aerial 1080 control at present, or 37% of all public consultation land (8 million Ha)**. This 37% is primarily significant public recreational hunting lands. These drops greatly concern NZDA and our members. It does not appear that the DOC maps cover anywhere near this amount of public conservation land.

DOC's Map makes it clear that the areas treated in many cases are the most accessible areas for recreational hunting. These include North and South Island forest parks and public lands on the edge of pastoral farmlands, often near significant regional cities eg Tararua Forest Park (this is shown on DOC's map as a large red blob).

So recreational hunters have often to go a long way to avoid land regularly aerial 1080-ed. Examples include Wellington-Wairarapa, Central and South Waikato, Taranaki, Central Hawke's Bay, Nelson, Westland, Catlins, East and Central Otago.

Often too the aerial 1080 is on the front of public land. Hunters would have to walk several kilometres through this aerially 1080-ed land to get to areas free of 1080 contamination.

NZDA requests the opportunity to explain and discuss these concerns so clearly apparent on the DOC map, directly with you.

2 No maps showing the future 150% AHB increase in aerial 1080 on public land:

The present aerial 1080 coverage of public land is bad enough. But AHB intends increasing it by 150% to 1 million Ha/yr. No maps of this are shown. This will approximately double the public land being aerially 1080-ed. This will be disastrous for wild meat contamination and bykill and will seriously discourage deerstalking and pig hunting.

3 Book on significant recreational hunting areas in NZ supplied:

As promised, I have supplied a copy of *Spot X New Zealand Hunting Guide*, by Mark Draper and Mark Airey (2006) to Andrea Eng for use by the Panel. I can supply further copies.

Though this guide is in its first edition, and does not list all significant recreational hunting areas – see the feral ranges for the different species for this – it does list 700 hunting spots for deer, wild pigs, tahr, and chamois (plus some for game-birds). It demonstrates the broad spread of recreational hunting across the whole of New Zealand, reflecting 150 years of deerstalking, and 230 years of wild pig hunting, and some 60,000 adherents.

4 70% increase in the area of bovine Tb bacillus in last 12 years:

I was very concerned about the spread of the bovine Tb bacillus from 23% of New Zealand's land area in 1990 (?) to 39.1% in 2002 (? Or 2007?), as discussed by Mark Coghlan. My understanding is that the bacillus could re-activate in the right circumstances at any time.

So the AHB goal of controlling Tb will never be achieved by current methods. Long term the cheapest means of control may be commercial harvesting, as it earns income, not poisoning to waste using aerial 1080, or possibly by animal vaccination.

5 Urgency! It's the Opponents that see the need for urgency

At the last session on Friday, Manuka Henare raised the very good point with the Applicants of what urgency they saw. For the Applicants, who want to double aerial 1080 "business as usual", there is really no urgency. If their 1080 operations are to be curtailed, then the longer the Panel deliberates the better.

It is the opponents that see an urgent need for change. Manuka's question was addressed to the wrong group. We trust therefore that you will accept NZDA's and other opponents' considered responses as to why there is a need for urgency from ERMA.

6 Urgent Need for deer repellent on public land for interim deer protection:

NZDA's desire for urgency relate to, first the large deer by-kill that often takes place with indiscriminately targeted aerial 1080 operations.

Deer, wild pigs, tahr and chamois are not usually targeted. **All non-target species, especially those that have wild food or recreational value to communities, urgently need mitigation measures, to reduce by-kill and meat contamination.** This has been requested in a number of submissions.

There are AHB aerial 1080 operations this winter on public land controlled by DOC, on significant deer herds. The local community's ability to take wild deer for food for the table will be seriously compromised because deer repellent will not be used. Usually the AHB is prepared to pay for and use repellent, but DOC will not allow it.

Such a case is the AHB operation on the edge of Tongariro State Forest, near National Park. NZDA or local deerstalkers will be writing to the Panel about this case, due to start in August, in the near future. NZDA believes the Panel should consider stopping these operations unless DOC allows repellent, or some other effective mitigant, in such cases. NZDA understands ERMA has the power to do this.

My presentation on Friday, showed postponing aerial 1080 even for a year, has a positive impact on deer numbers ie is a de facto mitigant. Delay of an operation for a year happens all the time with AHB and DOC aerial operations. The only need for urgency they argue is for budget allocation reasons, not environmental ones.

A precedent for delay has already been set. Aerial 1080 operation in the Blue Mountains Recreational Hunting Area, South Otago this winter, with repellent, was postponed by Southern Pest Management, last December because of ERMA's re-assessment.

7 More deer repellent use on public land urgently needed:

DOC refuses to allow repellent on any public lands that are not RHAs, and probably not even on RHAs if it has to pay – see my question to DOC on Weds 16 in Christchurch. This is a major constraint on a potentially valuable and cost-effective way to reduce deer by-kill.

NZDA recommends: ERMA urgently develop protocols, in consultation with DOC and deerstalker representatives, about allowing repellent to be used where significant recreational hunting areas are put at risk by aerial 1080. If stakeholders can agree, it makes things easier for ERMA.

8 150% increase in aerial 1080 by the AHB - disastrous for deerstalking;

NZDA's greatest concerns for urgency is because the AHB intends to more than double aerial 1080 use, primarily on public parks and other public land, in future. These figures are in **Table 4, Areas treated annually by AHB**, page 40 of the Application, namely an increase from 400,000 Ha to 1 million Ha for aerial 1080 use (150% increase). No figures are given for the DOC increase. But if funding was made available, it could also be significant.

As stated above for current use, much of the increased 3 Million Ha (600,000 x 5 years) is public conservation land, administered for the public by DOC. NZDA's estimates this as 90%, or **an additional 2.7 million Ha**. NZDA is still waiting for the AHB to get back to us and the Panel on the exact amount of public land involved, following my question to them at the hearings in Hamilton on Weds 23 May.

With a 6 year return time for DOC operations, and assuming DOC's current annual area of 200,000 Ha remains unaltered, this means an area of some 1.2 million Ha/year on public land by DOC in future. This is 5.5 million Ha altogether for the 5-year cycle. **This will be an astounding 68% of the 8 million Ha of vegetated public land administered by DOC for the public.**

There are major problems now for recreational deerstalkers **with 37% of public vegetated land being hit in the AHB-DOC 1080 5-year cycle**. Hunter concerns will greatly magnified if the AHB is given carte blanche to carry out the 1080 operations it plans to do in future.

There is an urgent need for ERMA to curtail the ability of AHB to expand its operations, as it plans, on public lands significant for deerstalking. This is ERMA's duty under various parts of Sections 5, 6 and 7 of the HSNO Act. At the very least it is essential to have an independent scientific assessment of the value and risk to hunting from AHB's desire to increase so significantly its toxic pollution of public land.

This independent assessment must have input from stakeholders opposed to such aerial 1080 expansion, and not just be a AHB/DOC snow job, papering over the cracks. If no increase of AHB operations on public land was proved needed, or if it was not allowed, or even reduced significantly when "official freedom" from Tb is reached by region, then the costs to farmers, taxpayers and regional council ratepayers would reduce significantly.

Given the reaction of Environment Waikato, of quadrupling its environmental pest expenditure as bovine Tb phases down, aerial 1080-ing the back country instead looks likely to increase, independent of any potential for decline overall in AHB operations.

NZDA agrees that there are risks to the pastoral livestock industry from Tb. Though after the evidence we have heard, these risks appear overblown. If these aerial 1080 activities are necessary for NZ pastoralism, there must be a quid pro quo for recreational hunters. Recreational hunters should not be made to sacrifice their recreation, solely so the pastoral sector can benefit against what appears to be a low level of export market risk from bovine Tb.

NZDA recommends: 1 **ERMA require an independent scientific study of the need for AHB's 150% increase in aerial 1080-ing public land**, much of it valuable for recreational hunting. This study to require input from stakeholders opposed to aerial 1080 use. Alternatives to aerial 1080 should be assessed, including "no increase in aerial 1080" and "decline in 1080", and harvesting regimes.

2 That **ERMA not allow any increase in AHB's operations on public land until** such an independent study has proved the need for such an increase.

3 If this independent study shows the need for increased aerial application of toxic poisons on public recreational hunting lands, then **ERMA require effective mitigation measures to maintain deer herds at levels allowing recreational hunting** and reducing wild meat poison contamination eg ground control or as a second best temporary measure, deer repellent

9 Urgent need for public involvement and controlled use for aerial 1080 consents:

The present Regional Council process where Councils make aerial 1080 operations a permitted use, suffer from conflicts of interest, and a record from Councils of sidelining

stakeholders with legitimate interests. Also national standards for the controlled use would be valuable.

NZDA recommends: ERMA require Councils where aerial 1080 is a permitted or discretionary use, to instead **make it a publicly notified controlled use, with national requirements.**

10 Johannesburg Environmental Summit – NZ's obligations to reduce toxins:

New Zealand is a signatory to the 2002 Johannesburg Environmental Summit memorandum. This called for all signatories to reduce toxins use. NZDA cannot see how New Zealand's obligation to reduce toxins can be met by AHB's plan to increase aerial 1080 by 150%. We ask the ERMA Panel to fully consider New Zealand's Summit obligations, and set out their impact on aerial 1080 use.

In conclusion NZDA would be pleased to answer any questions you have about this letter. We also ask for your written response to the matters we raise.

Thanking you

Yours truly

Dr Hugh Barr
National Advocate