

Summary of my submission on ERMA's review of 1080 and its use.

My message / request is very simple

- I really **appreciate that finally 1080 is to have an independent review of its use and suitability in New Zealand**. Too long has the management and apparent responsibility sat with the applicants, who co incidentally have been the main proponents of its use.
- to this end my only expectation is that **ERMA fully examines all information both scientific and public concerns / opinions and formulates a 100% assurance that no danger exists of contamination of the food chain**, for all components of the food chain
- My expectation is that the **outcome of ERMA's independent review** is that it has the option within its powers to use **s7 of the HSNO act if not 100% satisfied and decline the application**.

alternatively using **s29 of HSNO, ERMA will decline the application based on insufficient information available to determine the adverse effects**, ie all 1080's side effects are not known beyond a reasonable doubt

or alternatively impose obligations and restrictions to ensure no unintended side effects or by kill occurs using **s77A of HSNO**.

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- The **concern involving 1080 for the ecosystem and public health has been around for 50 years**. NZDA first raised the matter at its 1957 AGM. A **petition** in the early 1960's raised over 80,004 signatures when NZ had a population of around 2 Million. **The government ignored it**. Yet on the basis of just 40,000 signature the government changes daylight savings.

In **2005** this public position is still recognised with 'aerial application of 1080 poison particularly unacceptable' per the public survey by Fitzgerald et al (2000), who went on to suggest 'the public perception can be changed' and a method was given using 2 way propoganda

(DOC Research & Development series 216 – Aerial 1080 operations to maximise biodiversity protection, July 2005 s 5.10 pg 21)

I have seen a DOC paper discussing how to improve the perception of 1080, and it goes into many methods, including relabelling 'poison drops' as 'treatments'. Its not a fertiliser and never will be. It's a damn shame this cavalier approach exists in a department that is responsible for managing the publics assets. Changing its masters' majority opinion should never be its mandate.

- **For a true scientific commentary of the imbalanced approach** being taken by the applicants I suggest ERMA looks no further than **the O'Keefes submission**. True science should never be purchased or manipulated for a specific result. A good comparison is the Tobacco industry, (another poison distributor)

To conclude I want this independent ERMA panel to:

- **Establish a clean food chain assurance exists beyond a reasonable doubt**
- Insisting the poison use is specie specific and avoids by kill
- **Impose an independent audit requirement**, generating a full public impact report for each indiscriminate operation, (where any by kill can occur, whether it be insects, birds, wild animals or dogs)
- **Require a full independent scientific review of the impact of 1080**
- of concern is that NZ alone is the main user. Please require a look to the recent Australian 1080 review and of course to American research.