



19-E-0808 & 19-E-0812 / DOC 6143828

11 December 2019

Neville Reilly
via *FYI.org.nz*

Dear Mr Reilly

We refer to the requests you submitted to the Department of Conservation under the Official Information Act 1982 ("the OIA") on 18 November 2019 regarding raptor deaths that are the result of 1080 and brodifacoum poisoning.

Before considering your request, we set out the following contextual information in the hope that it will assist your understanding of the Department's use of 1080 and brodifacoum.

Why the Department uses 1080

1080 is a biodegradable compound – it dilutes rapidly to harmless levels in waterways and is broken down by microorganisms in soil. It therefore provides an effective method of controlling introduced predators such as rats, mice and possums, as well as stoats (through secondary poisoning). 1080 is suited for use in New Zealand owing to the fact that New Zealand has no native land mammals (except for bats). Therefore, 1080 can be used in New Zealand without having a negative impact on native species at a population level.

Aerial 1080 operations are the only effective option currently available to us to control pest populations in vast, remote or rugged areas (such as areas covered in thick forests). Trapping in these areas is not feasible because of the number of traps needed and the trap lines that would have to be cut, regularly walked and maintained.

1080 is saving our native species

Monitoring studies and peer-reviewed research carried out over more than 20 years show that aerial 1080 operations are highly effective at keeping predator numbers down and protecting our native species.

For example, monitoring results have confirmed that up to 60% of kiwi chicks are likely to survive to breeding age in areas with pest control, whereas only around 5% of kiwi chicks will survive to breeding age in areas without pest control.

Whio monitoring results have shown that three times as many whio ducklings are likely to survive to fledge in areas with pest control, in comparison to ducklings in habitats that do not have pest control.

More information about how 1080 helps to save our native species can be found on the following webpage on the Department's website:

<https://www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/proof-that-1080-is-saving-our-species/>.

Why the Department uses brodifacoum

Brodifacoum is a second-generation anticoagulant that is used for rodent and possum control. Brodifacoum is biodegradable in the environment and degrades to undetectable levels in soil after two to six months. It has low solubility in water and is therefore unlikely to be taken up by plants. It also binds strongly to soil and is therefore unlikely to contaminate waterways.

The use of brodifacoum is critical in eradicating predators and responding to rodent incursions on offshore islands and in fenced sanctuaries. Brodifacoum is currently the most appropriate toxin for reducing predator numbers in those situations because it is slow-acting, and therefore, avoids the risk of bait aversion that would otherwise occur if a faster acting poison was used.

The Department therefore has standards in place which allow it to continue to use brodifacoum in limited circumstances. These standards include, for example, using brodifacoum in operations that target rodents only, and using brodifacoum in operations in areas where pigs cannot be exposed to the toxin.

Your OIA request

We now consider your OIA request. You asked that we provide you with information on raptor deaths that have been caused by direct, and secondary, 1080 and brodifacoum poisoning.

In your first email to the Department, you also clarified that you only seek information that was prepared between 2014 and 2019. We have taken this to mean that you only seek information relating to raptors that have died, or were tested, between 1 January 2014 and 18 November 2019 (which is the date on which the Department received your requests).

The Department maintains a database, known as the Vertebrate Pesticides Residue Database (“the VPRD”), which contains records of animals that have been tested for toxins such as 1080 and brodifacoum. We are providing you with records extracted from the VPRD which relate a morepork that was tested for 1080 residue in October 2014. Those records are set out at “Appendix 1” (attached to this letter).

In providing these records to you, we are withholding the name of a staff member under sections 9(2)(a) and 9(2)(g)(ii) of the OIA to protect their privacy and to protect them from any improper pressure or harassment. In making the decision to withhold this information, I have taken into account the public interest considerations set out in section 9(1) of the OIA.

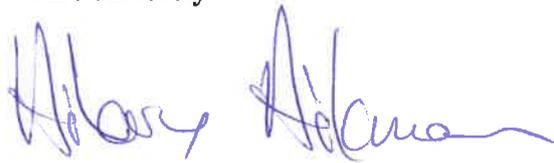
For the avoidance of doubt, I note that the Department has not tested any other raptors for 1080 between 1 January 2014 and 18 November 2019.

I also note that the Department did not test any raptors for brodifacoum during that period. We are therefore refusing this part of your request under section 18(e) of the OIA because the information you requested does not exist.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how you can make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that this letter (with your personal details removed) may be published on the Department's website.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Hilary Aikman', with a long horizontal flourish extending to the right.

Hilary Aikman
Director National Operations – Issues and Programmes

Appendix 1: entry from the Vertebrate Pesticides Residue Database (VPRD)

DOC Vertebrate Pesticides Residue Database - Yellow fields are mandatory																													
Sample details				508 records on this sheet				Location of sample					Pesticide Use							Result						References			
Sample reference number	Sample Category	Type	Element	number of elements or sub-samples in this sample	Date sample taken	Animal was found dead or alive at time of sample?	Comment on sample	Conservancy/ Region	Treatment Block Name or Location of sample	NZMS	Sheet	E	N	Trade name of pesticide	1080	Toxic loading	Bait type	Method	Start date of operation	End date of operation	comments on pesticide use	ppm (µg/g, µg/mL)	Detection limit (MDL, µg/g, µg/mL)	Lab or Source	Source Reference.	DOC Contact person	Pestlink Reference	File reference for lab report	Any other Comment
18822	Native bird	Morepork	Muscle	-1	19-Oct-14	Dead	Found during track clearance, Billy's Knob, one week after operation	Nelson/Marlborough	Wangapeka 1080 BFOB operation			1330730	4849150	1080 pellets	1080	1.5 g/kg	cereal pellets	Aerial	13/10/2014	14/02/2015	RSS bait, prefeed 1kg/ha, toxic 2kg/ha (12 g baits) & 1 kg/ha (6 g baits)	<MDL	0.001	LCR Lab	Landcare Report No.: T5712	[REDACTED]	1415MOT05	DOC-2339265	