

1.2. SUMMARY OF POSITION

NZDA opposes the ongoing indiscriminate aerial and ground-based use of compound 1080 in New Zealand. It proposes that ERMA should produce a reassessment decision that endorses the gradual reduction of all indiscriminate aerial and ground-based broadcasting of 1080, to nothing by 2015. The Association also believes that 1080's future use should, wherever possible be confined to ground-based operations, where bait can be enclosed in species or guild-specific baiting containers within regimes that will pose fewer risks to non-target species and to humans.

The year 2015 represents the outermost acceptable limit for NZDA for the complete cessation of the indiscriminate use of 1080, and is also referred to as a significant point in time within the application document for the projected outcomes of the particular strategic objectives of the applicants.

NZDA believes current 1080 use in New Zealand poses unacceptable risks to game animals and hunting dogs, and imposes unacceptable restrictions on hunters' use of significant areas of wild lands, which are subjected to 1080 poisoning operations.

The Association also strongly asserts that 1080 use on public lands, in particular, inhibits hunters' ability to take safe, readily consumable wild meat for their families. The chronic persistence of sub-lethal and even negligible amounts of 1080 within the components of ecosystems used by hunters, including game animals themselves, ensure a degree of wariness among hunters who are excluded from areas which have historic and traditional hunting value.

NZDA believes this application fails to acknowledge or assert substantial values in respect of game animals. It believes that ERMA's governing legislation compels the authority to consider the definition and application of the term "valued introduced fauna", as that term is used in section 6(a) of the HSNO Act 1996. The Association feels this reassessment is an excellent opportunity for a Government agency to provide direction on, and to promote awareness and the importance of, the values New Zealanders place on introduced species, including game animals. This matter is especially topical, where the Act governing the authority specifically mentions them.

NZDA believes any gradual reduction of 1080 use in New Zealand, should be implemented with the support of specific controls and permissions which may compel the applicants to reduce the quantities of 1080 sown, in all operations, irrespective of method. It believes such controls and permissions as ERMA grants, should where possible, ensure the measurable mitigation of the effect of 1080 on game animals, in areas where they are valued by hunters.

NZDA does not support the proposals of DOC and AHB to increase their aerial poisoning effort in remote areas of the conservation estate, and other Crown and private lands while neither agency is prepared to examine the costs and benefits of, or alternatives to, such aerial operations.

NZDA supports any decision of ERMA, irrespective of controls on 1080 itself, which endorses the use of possum-harvesting operations in areas historically affected by Tb, and those currently unaffected by it. The Association believes the applicants should be compelled to consider ground-based harvesting as a complementary method to the use of

targeted 1080 operations, more seriously than either applicant has to date. NZDA advocates that ERMA delegate authority to the applicants and to the National Pest Control Agency to begin work on a national framework for prioritising the scope and type of operations used to control Tb vectors. Such authority, if vested, may assist the applicants to more carefully allocate and encourage groundbased opportunities for possum harvesting as a part of their wider control strategies.

NZDA believes there are sufficient uncertainties being expressed by members of the health and scientific communities, here and elsewhere, to support a reduction in the tolerable exposure level, the environmental exposure level, and the workplace exposure standard prescribed for 1080 in New Zealand.

NZDA is concerned by the inadequacy and bias of much of the riskcost benefit analysis provided by the applicants in their section. It has provided a limited critique of their arguments and data in the time available. NZDA asks that ERMA make its own full independent assessment of these matters, including the issues concerning recreational hunting and commercial venison recovery which NZDA raises.

NZDA acknowledges that advances in the formulation and application technologies associated with 1080 have reduced potential risks to some nontarget species. However, it believes there are still enough uncertainties and unanswered questions in respect of some native and introduced birds, native insects, aquatic animals and people, as to warrant a gradual reduction in, and final cessation of the use of 1080 by the applicants.

