

# Appendix T: Summary of Submissions

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## T1 Summary

This summary presents a selection of extracts from the public submissions. The extracts cover most issues raised in the submissions, but in many instances only one or a few of the submissions that touch on a particular issue are noted in the tables.

**Table T1: Environmental aspects**

Biodiversity; native flora and fauna <i>Issues</i>	Submission	Organisation (submissions from named organisations; other submissions are personal submissions)
1 Following the 1996 1080 operation in the Hokonuis it took 5-8 years for hawks, and moreporks to recover. In 2004 [after another 1080 aerial operation] there was again loss of tuis, pigeons and bellbirds. Within a few days [of the 1080 operation] bird song diminished to almost nothing and has yet to return.	9039	
1080 can be implicated in the continuing collapse of indigenous fauna, especially in the bush. In areas where there has been no 1080 operations there is a rich indigenous biodiversity.	9045	
Long term effects on forests and forest life with enormous risk of destroying ecosystems.	9261	
2 Bush poisoned more than once by 1080 has remained virtually silent. The morning and dawn chorus has been virtually non-existent.	8963, 8501, 8747	
Poisoning cannot solve the pest problem except on offshore islands and in fenced areas.	9283	
I have been in Stoney Creek valley after a 1080 drop and it like a morgue – deathly silent. In contrast in the morning of the same day, I had been in an adjoining valley which had not had 1080 dropped (The Waitahu) just a few kilometres away – and the bird life was prolific.	9261	
I recently went to Pureora for the first time in 15 years – the bush felt eerie and devoid of life. In fact I saw only three fantails and a couple of blackbirds.	7354	
Areas of bush sown with 1080 poison baits change overnight from a relatively thriving and populated habitat to a silent and uninhabited place.	8666, 8296	

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Repeatedly dropping food laced with 1080 indiscriminately into a forest is an ecosystem level intervention that would be expected to have a wide range of effects on flora and fauna. Yet not one 'Control level 1' or better study has been done at ecosystem level.	9198	
<p>We do not know the degree to which possums negatively impact populations of native floral species, and we do not know if aerial 1080 ameliorates the damage. Possums undoubtedly 'prey' upon native forests, but the net effect of that predation, the degree to which it can and should be reversed, is far from clear. Even the flawed and biased studies present a confused and inconsistent picture.</p> <p>Therefore it is impossible to make a rational decision about whether the <i>a priori</i> risks and the empirically proven risks of aerial 1080 are justified by the benefits.</p>	9198	
<p>1) As a landowner along the Napier-Taupo road I have noticed an almost complete disappearance of all living fauna after each 1080 drop. The possums, rabbits and rats are the first to recover, the birds have still not recovered.</p>	8591	
<p>I have personal experience of endangered species recovery being wholly due to the use of warfarin bait stations maintained at targeted times (nesting season) with regular checking. I refer to the Cook Islands kakeroi which was on the very brink of extinction and is now at some 270 birds with a second population being re-established on another island.</p>	8747	
<p>We are the world's leader in endangered species. Both flora and fauna. If we are to save what precious little we have left, then at this stage 1080 usage is the major component in the fight to save our biota.</p>	8561	
<p>Why is it that in areas where neither DoC nor AHB have done an aerial drop of 1080 there is a greater diversity and what appears to be a greater number of 'endangered species, than in areas that have had an aerial conservation poisoning?</p>	8556	
<p>Aerial broadcasting of 1080 has been carried out for at least 40 years. The cost of which can be measured in the catastrophic depletion of our native bird, insect and freshwater life.</p>	9267	
<p>1080 is non selective. Aerial 1080 falls into waterways and kills non-target species such as native birds, pigs, deer and dogs.</p>	9070, 9261, 9183, 9184, 9109	Te Kuiti Pig Hunting Club
<p>1080 kills practically everything it comes into contact with and it keeps killing down the food chain.</p>	9047, 8697, 8517, 8327, 8277, 9173, 9314, 9309	
<p>Okahu Valley was 1080'd and on returning there nine months later there was no sign of deer, no bird chorus and no kiwis calling in the night.</p>	9046	
<p>Aerial 1080 poses a risk to the environment in its impacts on non-target species, fish, animals, birds (including game birds) as well as posing a risk to humans and domestic animals (dogs and cats).</p>	9283	
<p>Need to investigate possible impact of 1080 on some bacteria in a New Zealand context.</p>	9283	
<p>ERMA should carryout additional research to clarify risk and their effects. What is the effect of 1080 on bacteria?</p>	8648	
<p>Before the use of 1080, the bush behind us would echo to the call of 1080; after 1080 baiting – nil.</p>	8901	
<p>After an aerial drop there is no sign of bird life, and deer dead in the streams. DoC should be fined in the Environment Court as anyone else would for having animals die in this way.</p>	8525	

<b>Biodiversity; native flora and fauna Issues</b>	<b>Submission</b>	<b>Organisation (submissions from named organisations; other submissions are personal submissions)</b>
Aerial 1080 has adverse impacts on all native and introduced animals, especially ground feeding birds. Consequently there is a by-kill in back country ecosystems, eg insects, carnivorous snails.	9029	Council of Outdoor Recreational Associations
1080 affects the food chain eg insects, worms. The impact of this affects birds and mammals when they eat the bait directly or eat food that has been killed by the poison. If this is continued the build-up effect over time will be irreversible.	8739	
The disappearance of frogs and kiwi calls from areas of the West Coast, as has been noticed by locals and experts, is linked to aerial 1080 poisoning.		
The loss of wood pigeon numbers from the Catlins Forest Park has been acknowledged by DoC. The loss of kea also a reminder of what is happening.		
Introduced pests are a major threat to Northland's biodiversity and many farmers have invested in biodiversity protection of their land – many requests from landowners wanting to us 1080 on their land.	9094	Northland Regional Animal Health Committee
Well-managed use of 1080 is a useful tool in the elimination of browsing and predatory exotic animal pests. Research shows that that nesting success of many native species of birds is greatly enhanced because of the recovery of forest vegetation and increased availability of nectar, berries, and associated insects for food.	8954	Auckland Conservation Board
In the 30 years plus that 1080 has been used in the Waikato region there have been no incidents of risk to human health, no contaminated waterways and no massed killings or localised extinctions of native birds and animals. There have been records of individual bird deaths, both exotic and indigenous but no situations whereby 'silent forests' result. The Hauhungaroa Range has been treated three times with 1080, and the native bird population is now thriving.	9092	Waikato Regional Animal Health Committee
1080 has been shown to be the most effective, efficient and environmentally least damaging poison to achieve the aims of restoring native forest and wildlife. 1080 and other poisons are laid by hand within the Pukaha Mt Bruce Forest. Around Pukaha Mt Bruce Forest 1080 is spread by air. The Tararua Forest Park is near Pukaha Mt Bruce Forest and the only practical option is aerial 1080. If control is not maintained, it provides a reservoir to supply a constant source of pests to reinfest Pukaha Mt Bruce Forest. Without the aerial control by 1080 on the margins of Pukaha Mt Bruce Forest, the task of maintaining very low numbers of pests within Pukaha Mt Bruce Forest would be nearly impossible with the tools we currently have available.	8593	Pukaha Mt Bruce Board
We recognise that birds may be affected when aerial 1080 is spread aurally over large areas. The evidence is that a short term population drop is followed by a sustained increase above previous population levels where pest control is maintained. Local bird populations bounce back quickly because of the reduction in the numbers of possums, mustelids, rats and cats. The evidence from Pukaha Mt Bruce Forest is that no native birds recently restored to Pukaha Mt Bruce Forest or which have been bred in recent years at Pukaha Mt Bruce Forest have been adversely affected by 1080.		
Tb control work has had significant conservation spin-offs. In the Catlins, rare species of mistletoe have reappeared following sustained possum control. Rata, kawahi and totara forests have also benefited greatly, with rata forest in particular now flowering spectacularly through the summer. The improvement in habitat and reduction in predators have also boosted bird populations.	9092	Otago Regional Animal Health Committee

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<p>We have a beef farm in Golden Bay with the Kahurangi National Park behind us. 1080 was laid on the DoC land in 2000 and 2005. Tomtit, fernbird and blue duck responded well to the first drop (we had not seen a fernbird or blue duck for 10 years) and a nearby remnant weka population multiplied rapidly in the predator-free window that 1080 provided. In fact this remnant population of &lt;10 birds may well have died out if there had not been a 1080 drop. Possum and mustelid populations dropped right away and we have implemented a complementary trapping programme to keep them down.</p>	7344	
<p>The Maungatautari Ecological Trust supports the continued use of 1080 for pest control and in particular the ability to apply from the air. The Maungatautari Ecological Trust is a community-based organisation established to eradicate all introduced mammals from 3400ha remnant indigenous forest. Although brodifacoum has been used in the recent past, the use of 1080 in the future is a real possibility, and the inability to use it will have a significant negative impact on our goal of complete eradication of all mammals from our area which is surrounded by a pest-proof fence. One of the main reasons for selecting Maungatautari was the relatively good health of the forest environment which was largely due to three aerial applications of 1080 by the AHB over the past 10-15 years.</p>	9079	Maungatautari Ecological Trust
<p>Use of 1080 can be the difference between survival and extinction of some of our most critically endangered species. Since 1981, the number of New Zealand species recorded as threatened with extinction has increased from 92 to 2788. Much of this increase is due to the devastating effects of the suit of exotic predators that exist in New Zealand today. 1080 is the most effective pest/predator control agent against many of these invasive species.</p>	9698 (and many others)	
<p>Hunt's Creek is on conservation land, but it falls just outside the Arthur's Pass National Park boundary. The next valley, because of its higher conservation value, receives aerial applications of 1080 to control possum numbers, thereby limiting the damage caused by browsing. This valley appears to have healthy vegetation; the other is under considerable stress. Aerial application of 1080 is the only way these areas can have their possum populations kept in check and minimising further canopy collapse. The argument that large tracts of New Zealand's forests are silent because 1080 wipes out everything is not true. One of the main reasons that our forests are silent is that clear felling has destroyed extensive tracts of lowland forest that supported larger populations of birds ( see <i>Nga Uruora – The Groves Of Life</i> Geoff Park, 1995). Another reason for the lack of birds in many forests is the high degree of predation by carnivorous mammals. Although 1080 may occasionally kill some native species, it also controls many predators. Reduction in deer and pig numbers is a small price to pay compared with preserving those things that are not only unique, but also relatively pristine (eg prevention of erosion and waterway contamination by siltation because of lack of forest cover). There is room for both hunting and aerial application of 1080 to co-exist in the New Zealand wilderness. Just because a chemical can be detected in meat (eg venison) does not mean to say that it is present in lethal or harmful concentrations.</p>	9090	
<p>Many rare and endangered species of plants, birds and other fauna have been able to thrive in what are now pest free areas on the mainland and off-shore islands because of the use of 1080. Its use helps preserve native flora and fauna for now and future generations.</p>	9069	Local Government New Zealand
<p>I have 14ha of native bush which has had 1080 plastered all over it three times, and is full of birds. Before the use of 1080 you would only see pigeons in ones and twos.</p>	8903	

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1080 increases forest health and bird numbers	8756	Environment Waikato's North and South Biosecurity Advisory subcommittees.
Aerial 1080 operations in forest that surrounds our property has reduced Tb infection in our dairy herd and improved plant and bird life in the forest.	7777	
Use of 1080 bait is essential for the continued preservation of our indigenous flora and fauna.	7517	Pest Control Research Ltd
The AHB have recently undertaken two aerial 1080 pest control operation over our farm. This has dramatically reduced the threat of Tb (in our deer herds). The benefits to the bush and birds from possum control have been enormous. Bird numbers increased and rata flowered for the first time in 25 years.	7325	
Aerial 1080, the only toxin registered for this purpose on the mainland has been shown to be an effective, inexpensive and safe method for control of key pests of mainland forest ecosystems.	9291	Royal Forest and Bird Protection Society
Monitoring undertaken following 1080 control operations repeatedly demonstrated the efficacy of 1080 through significant increase in bird numbers, successful breeding of vulnerable species, canopy regeneration, increased invertebrate biodiversity, and reappearance of palatable species.	9291	Royal Forest and Bird Protection Society
Deaths of individual animals not targeted by control operation can occur during 1080 operations, with insectivorous and scavenging birds being most at risk. At a population level however, the use of 1080 has consistently been shown to result in considerable net gains for native species, owing to their increased reproductive and survival rates in the presence of lower populations of introduced predator and competitor species.	9318	Auckland Regional Council
Both my work and my hobbies (deer stalking and photography) take me into some of New Zealand's great wilderness areas and I have seen for myself the benefits that aerially applied toxins can have for native wildlife and plants.	8726	
My own observations based on many years of formal bird counts, participation in relevant research projects and casual observation are that bird populations almost invariably increase following 1080 operations.	8549	
Recovery of native wildlife after a 1080 operation substantially outweighs any by-kill from the operation and/or the consequence of doing nothing.	7861	
Farmers have commented on the rapid increase in native birds following vector control work. Enclaves of native bush are regenerating, flowering is becoming more prolific.	9213	Wellington Regional Animal Health Committee
New Zealand's natural heritage faces an ecological holocaust caused by introduced animal and plant pests. The use of 1080 is an essential tool in the battle to win our heritage back. This is not a luxury, or something we do for the tourist industry; it is about protecting our unique sense of 'kiwi identity'.	9212	Waipoua Forest Trust Inc

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<p>Most of New Zealand's forests are going backwards; with a steady decline in canopy cover, progressive loss of the most palatable species, and a steady decline in populations of native fauna due to pest species. As aerial 1080 is such a cost effective method of pest control, its use should be extended to provide protection for a much greater area of New Zealand's forests. Only 1080 is able to consistently suppress pest populations to low enough levels to protect sensitive species. For plant species like rata and native mistletoe, it only takes a very small population of resident possums to completely wipe out these highly palatable plants.</p>	9231	Te Puke Forest & Bird
<p>There are millions of hectares of prime heritage land that are totally untreated, often being irreparably degraded by possum, goat and deer impacts. A stark example is the Kaihu ecological reserve.</p>	9212	Waipoua Forest Trust Inc
<p>One 250ha forest area I studied revealed two species browsed out to one remaining individual, no regeneration of some major canopy species for 30 years and virtually all surviving regenerating miro browsed to a stick. After one aerial 1080 operation and many dead deer, the forest floor came alive for the first time in decades. A year later almost no miro browse was discernable.</p>	9212	Waipoua Forest Trust Inc
<p>Research has shown that possums are contributing to the decline of birds such as the North Island kokako, as well as competing with many other native animals for food and habitat. While some significant successes have been achieved – especially offshore – we are losing the war against pests on the mainland. Further extinctions are inevitable.</p> <p>It is difficult to foresee a time when we will not be so dependent on 1080 as an important tool in averting further catastrophic declines in biodiversity, and creating opportunities to protect and restore forest communities.</p>	8549	
<p>We see 1080 as the most effective and only way to eradicate these pests and save the decline of the forest. As owners of a charter vessel based in Doubtful Sound, we see the damage these pests are causing every day. Our broadleaf, pseudopanax, hen and chicken fern etc are not regenerating and the forest is becoming very quickly modified.</p>	9132, 9133	Fiordland Ecology Holidays
<p>Inappropriate emotional opposition to effective methods to control introduced pest species should not be allowed to overrule our responsibilities towards the native wildlife of New Zealand. 1080 will give our wildlife a chance to survive even at the 11<sup>th</sup> hour.</p>	9728	
<p>There is no affordable, practical alternative to 1080. Have the courage to go with the science, which clearly indicates minimal, acceptable by-kill at worst.</p>	9727	
<p>We support the use of 1080 to conserve New Zealand's native forests, plants and animals. The use of 1080 is vital to control rabbits and possums so that the continued regeneration of our native flora and fauna can continue.</p>	8454	Banks Peninsula Pest and Weed Liaison Committee
<p>The aerial application of 1080 should be continued in areas of high conservation value. Removing pests such as possums, deer, ferrets, stoats and rats from conservation areas is important to upholding the integrity of our forests. 1080 is at present the only effective way of doing this. Doing nothing is irresponsible. Using control methods which we know to be ineffective in large conservation areas is as good as doing nothing and is irresponsible.</p>	8451	

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<p>As a result of the original absence of ground predators, a high 5 of our indigenous birds nest on the ground including kea, falcon, kiwi, waybill, variable oyster catcher and all species of dotterel. To give these birds an opportunity to breed successfully, populations of ground dwelling predators must be reduced. We have a responsibility to retain iconic animals (eg kiwi, kakariki, kakapo, kokako, New Zealand dotterel) for future generations to enjoy. Possum, ship rat, native rat, mustelids, pigs, deer have thrived here but they are not part of the original ecosystem, so considering these animals to be the most important part of the ecosystem is inappropriate.</p> <p>Overseas countries have a much lower use of 1080 because part of their ecosystem is native mammals which would be affected. This is a fact that many New Zealanders do not understand as some assume the low overseas use means 1080 is dangerous. Aerial control must continue as the mountainous terrain limits the effectiveness of ground control.</p>	9027	
<p>As a frequent visitor to Rangitoto I have seen 1080 in action; without its use Rangitoto would not be the beautiful place it now is.</p>	8677	
<p>Our Trust has been formed to restore the bush in Mt Ngongotaha. Although part of the forest has never been logged it has lost species due to possum browsing. The most notable is Northern rata, which used to be a significant feature of the bush. Almost all the rata trees are now either dead stag-heads or rotting logs. In fact we found only one surviving mature tree over 750ha of bush.</p> <p>While the loss of rata is dramatic, the constant browsing on trees, shrubs of leaves and buds could have caused the loss of less prominent species and will prevent some species from regenerating. There are further repercussions from possums browsing fungi, and predating insects and birds.</p> <p>Although we are not planning to use 1080 in the near future we want to keep that option open for the future if required. Deaths of native species from 1080 are regrettable but a number of studies have shown an overall gain for native species.</p> <p>Organisations undertaking pest control operations need to have available every technique known to be effective and to meet safety requirements. In our opinion 1080 is effective and does meet safety requirements.</p>	8748	Mount Ngongotaha Bush Restoration Trust
<p>It is well documented, and I have observed first hand over a period of 20 years the damage wrought on Southern rata in South Westland by uncontrolled grazing by possums and the subsequent decline in birdlife in the region. 1080 is used by DoC in the battle to save native species from extinction. There is overwhelming credible evidence of the benefits to native bird populations and general species diversity when 1080 is applied to reduce both predator and grazing pressure. Any moves to stop or reduce the use of 1080, and particularly the aerial application of 1080, will have a significant impact on the ability of DoC to stop or reverse the slide of important New Zealand species into extinction.</p>	9147	
<p>There were some issues with the accidental poisoning of birds when bait size was not properly screened, but that issue has been well addressed now. We are different from any other country. When man set foot in New Zealand there were no mammals apart from bats. Introduced species have had a disastrous effect on our natural heritage, overgrazing forests and killing birds. There is now a huge amount of empirical evidence supporting the gains that have occurred with 1080 programmes. While I realise that 1080 is not the whole answer it is an important tool.</p>	8533	

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<p>We hope to encourage DoC to use aerial 1080 to cover the Kaimai-Mamuku Conservation Park. Our experience of ground control is that it is relatively expensive compared to aerial 1080 and with the terrain it is not possible to cover the area adequately. Other alternative toxins have proved less effective at reducing possum numbers.</p>	9349	Agonatete Forest Restoration Trust
<p>The forest at Anogatete is in advanced state of collapse. Possums have killed kamahi, kohekohe, rata, fuschia, and raukawa. Continued deer browse has removed seedling regeneration of Asplenium ferns, pate, <i>Coprosma australis</i>, fuschia, broadleaf, raukawa and kamahi. Ship rats, feral cats, stoats and possums are predating invertebrates, reptiles and birds. In the last 50 years the forest has lost kaka, kakariki, kokako and kiwi.</p>	9150	Kaharoa Kokako Trust
<p>The years in which we used 1080 resulted in excellent kills on both possums and rats (the primary predators of kokako) while in the years in which alternative pesticides were used results have been variable. At Kahaora we have all witnessed first hand major gains in kokako numbers, as well as other bird species, and a general improvement in the forest condition. It is vital for the trust that access to 1080 is retained.</p>	9254	
<p>The use of 1080 at the Rotokare Scenic Reserve has lead to a significant improvement in native fauna and flora present, that would otherwise be difficult to achieve by ground based methods.</p>	9334	Wellington Conservation Board
<p>The outcome of 1080 use should be judged primarily on the net effect on animal populations. With sensible and proper use, no-target deaths can be kept very low. Both population monitoring studies and the direct observation of tagged individuals show that the benefits of 1080 to non-target species are large. The evidence is clear that the biodiversity benefits of 1080 use significantly exceed the biodiversity costs.</p>	9320	EcoFX Ltd
<p>Ongoing use of aerial 1080 will prevent the extinction of a wide range of endemic species of animals; for DoC there are simply no other viable alternatives to 1080.</p>	9320	EcoFX Ltd
<p>Without 1080 the New Zealand Biodiversity Strategy would become unobtainable.</p>	8759 (and many others)	
<p>In the last couple of decades 1080 has been the key factor that has allowed New Zealand's forests to come alive. Use of 1080 can be the difference between survival and extinction of some of our most critically endangered species.</p>	8753	
<p>From an environmental perspective it is now amazing to view the mass of rata flowers in the Taupo Lakeshore Reserve, since the major aerial 1080 possum control programmes; although anecdotal, it is testament to the damage possums were incurring in our native bush.</p>	9088	Taranaki- Whanganui Conservation Board.
<p>Aerial application of 1080 is a particularly valuable tool in a Conservancy such as ours, where many rare and endangered species are found in remote, highly dissected terrain. The need to improve compliance by a small number of operators or managers is not a reason why the toxin should be unavailable for widespread use by licensed operators. We do not support the widespread use of repellents in baits - Tb control and conservation gains will be reduced if repellents are used in baits.</p>		



<b>Biodiversity; native flora and fauna Issues</b>	<b>Submission</b>	<b>Organisation (submissions from named organisations; other submissions are personal submissions)</b>
I support the use of 1080 as a farmer and a hunter. I have shot in areas not poisoned for many years and the damage is always bad for native forests from pests. In the bush there is no birds and lots of damaged trees. The by-kill is acceptable for all the good that is achieved. Tb control by use of 1080 on vectors has been a major success.	8519	
As a hunter and fisherman I have a strong affinity with the New Zealand bush. Due to the extensive area rugged country that requires possum control, the use of aerial 1080 is the most effective and economically viable tool available. Yes, deer will be killed but better than the alternative which would be no kiwi, wood pigeon, or kaka, let alone our more endangered bird species. The secondary poisoning effect of 1080 makes it particularly useful against rats and mustelids. If 1080 use is restricted or stopped we will be resigning ourselves to the loss of most of our precious native wildlife.	8308	
1080 is critically important to protect the country's biodiversity. This is for reasons of national enjoyment and pride, and because we have a duty not to reduce the world's biodiversity. I am not aware of any credible evidence to suggest that methods not including 1080 could match the results being achieved now with 1080. The topography of much of the country does not lend itself to ground based methods of control. Rugged forest areas are the very places that support most native bird life, including acutely threatened species such as mohua and kakariki. Without 1080 the more accessible forest areas would still suffer because the higher cost of solely ground based methods would limit the scope of operations.  The predation of eggs, chicks and sitting female birds by possums, stoats and rats is a very serious problem. That, together with refinements over the years in DoC's procedures for the use of 1080, makes the small risk of bird kill well worth taking.	7589	
"We have lived in the Mangatarata (on the western edge of the Hauraki Plains) since... 1978. At that time it was impossible to have any sort of orchard as the fruit tree blossoms were eaten even before the fruit could set. ... Bird life was very patchy eg we saw tui perhaps twice a year..... trees such as kohekohe did not flower or seed and were extensively browsed.... Some ten years ago a farm a kilometre or so up our road tested positive for Tb and the regional council began a possum control programme using both 1080 and other means of control....The situation is now that the bush in the Matahuru reserve is recovering... We now have countless tuis around..., kaka are frequently seen. ....When other pests such as goat, pigs and deer are killed by the 1080 drops, people that hunt these pests are disturbed by the lack of game.... They care about their own hunting experiences and little about the bush as an entity".	8862, 8863	
"In the last few years I have been working hard to portray New Zealand's exceptional wildlife heritage in my recently published photo book <i>New Zealand: A Natural World Revealed</i> ... I can attest firsthand to the enormous difference achieved by extensive applications of 1080 to our wilderness areas in forestalling and even reversing the rampart destruction brought about by introduced pest species".	9429	