

Vertebrate Toxic Agent Use Policy

Document approval and history

Version	Date	Initiated by	Description / main changes
1.0	<i>December 2016</i>	<i>Geoff Kerr</i>	<i>Draft Policy 1080 – 2016 (developed December 2016).</i>
1.1	<i>January 2017</i>	<i>Geoff Kerr</i>	<i>Edits accepted and finalised 14 March 2017.</i>
1.2	<i>December 2018</i>	<i>Stephen Hall</i>	<i>Discussion about revising Policy, Council Meeting 23 August 2018. Placed on Council website 4 December 2018.</i>
1.3	<i>July 2023</i>	<i>Kaylyn Pinney</i>	<i>Draft policy circulated and discussed, Council Meeting, 4th May 2023, edited and approved by email consensus, 31st July 2023.</i>

Recommended date of review 2025

Introduction

Why the vertebrate toxic agent use policy has been prepared and what it seeks to achieve.

The use of vertebrate toxic agents for controlling small mammals to prevent the spread of disease and to reduce predation of threatened indigenous species is undertaken over large areas of both public and private/leasehold land in New Zealand.¹

Vertebrate toxic agent use can have significant impacts on game animal populations, their management and availability as a public resource. Game animals include deer, tahr, chamois and wild pigs (excludes goats), and are recognised as valued introduced species in Te Mana o te Taiao – The Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS).² The ANZBS outlines goals for managing valued introduced species to reduce negative impacts on biodiversity and maintain their recreational, and cultural value.

Where vertebrate toxic agents are applied by mechanisms that expose game animal populations, variable levels of mortality can result, and in some cases, mortality can approach 100%.³ In addition, meat harvest restrictions are imposed between 2-5km from the area exposed to vertebrate toxic agents, depending on species targeted for harvest, for between 4 months and 3 years, depending on the toxin used, to minimise potential risks to public health. Variable game animal mortality rates and harvest restrictions following vertebrate toxic agent application create significant challenges for implementing long term game animal management programs that maintain their recreational and cultural value.⁴

The policy outlined is intended to clarify the Game Animal Council's (GAC) position on the use of vertebrate toxic agents in New Zealand, specifically, where the use of these agents may impact game animals, their management and availability as a public resource. The policy will be used to guide the GAC while undertaking statutory functions, section 7, GAC Act 2013, where vertebrate toxic agent use is a relevant factor.

Interpretation

The policies outlined in this document were prepared while recognising the statutory and legal responsibilities of the Minister of Conservation and of other decision-makers including, the Department of Conservation, OSPRI, Ministry of Primary Industries, Land information New Zealand, Regional Councils, and private and leasehold land holders.

The level of detail varies depending on the amount of scientific evidence available for consideration and the direction provided for in legislation.

Policy For Vertebrate Toxic Agent Use

The Game Animal Council policy on the use of vertebrate toxic agents to control animal pests in New Zealand is to:

1. Advocate for minimising the use / mitigating the impacts of vertebrate toxic agents that can affect game animals, their management and availability as a public resource.
2. Acknowledge that vertebrate toxic agents are currently used to successfully control some animal pest species to protect environmental and economic values.⁵
3. Acknowledge that the hunting sector does not generally consider the use of vertebrate toxic agents for the control of game animals in New Zealand to be acceptable, accordingly the GAC opposes the use of vertebrate toxic agents for this purpose.
4. Recognise the broad risk to New Zealand's reputation across multiple areas, including food safety, tourism and the social license to continue using vertebrate toxic agents as a pest control tool, even if their use is well managed.
5. Strongly advocate for continuing improvement to the national strategic approach on the use of vertebrate toxic agents, regarding consultation,⁶ science, mitigation,^{7,8} animal welfare,⁹ residue safety,¹⁰ market and tourism perceptions, consistency of application, alternative options,¹¹ and adoption of best practice across New Zealand.
6. Advocate for the allocation of resources to find alternatives to vertebrate toxic agents for controlling pests in New Zealand that have reduced impacts on game animals, their management and availability as a public resource.
7. Maintain that, prior to the application of vertebrate toxic agents that can affect game animals, their management and availability as a public resource on or within 2-5km of public land, a consultation process should be completed that:
 - a. Meets accepted principles and standards for consultation (i.e., takes account of stakeholder views, including hunting sector stakeholders and mana whenua).
 - b. Is transparent and all available information is provided.
 - c. Allows stakeholders to identify and advocate for potential mitigation measures.
 - d. Is consistent nationally throughout all agencies.
8. Maintain that each application of a vertebrate toxic agent that can affect game animals, their management and availability as a public resource should:
 - a. Be based on clear evidence-based rationale that the method is suitable and necessary to achieve clearly described outcomes.
 - b. Be designed for the target species and minimise impacts on non-target species, their ongoing management and availability as a public resource.
 - c. Ensure appropriate impact mitigation methods are used where game animal populations are present, and hunting is an important component of their management.
 - d. Minimise adverse effects on the environment.
 - e. Minimise impacts on mahinga kai.
 - f. Be monitored to confirm points a-e are achieved, and if not achieved, seek to understand why, and make recommendations for improvements to future use.

9. Maintain that information on vertebrate toxic agent use in New Zealand should be publicly accessible, e.g., vertebrate toxic agent use by any agency or land holder that can affect game animals, their management and availability as a public resource is outlined on a central publicly accessible web page, that provides:
 - a. The evidence-based rationale for the operational design and the prescribed outcomes of vertebrate toxic agent use.
 - b. The operational parameters of the vertebrate toxic agent application.
 - c. The extent and duration that game animal harvest is restricted following the vertebrate toxic agent application.

¹ DOC. Pesticide summaries: where pesticides are used. Accessed November 2022.

² DOC. Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020. In. <https://www.doc.govt.nz/globalassets/documents/conservation/biodiversity/anzbs-2020.pdf>; Department of Conservation; 2020.

³ Morriss GA, Parkes J, Nugent G. Effects of aerial 1080 operations on deer populations in New Zealand. *New Zealand Journal of Ecology*. 2020;44(2):1-8.

⁴ deCalesta DS. National and Regional Perspectives on Deer Management. In: *Deer Management for Forest Landowners and Managers*. CRC Press; 2019:93-97.

⁵ P.C.E. *Taonga of an island nation: Saving New Zealand's birds*, Parliamentary Commissioner for the Environment <https://www.pce.parliament.nz/publications/taonga-of-an-island-nation-saving-new-zealands-birds2017>.

⁶ CRESA. *Community consultation by the Department of Conservation: An independent review*. <https://www.doc.govt.nz/globalassets/documents/science-and-technical/communityconsultation.pdf>; Department of Conservation;1998.

⁷ Morriss GA, Parkes J, Nugent G. Effects of aerial 1080 operations on deer populations in New Zealand. *New Zealand Journal of Ecology*. 2020;44(2):1-8.

⁸ Morriss G, Yockney I, Nugent G. *High effectiveness of deer-repellent Prodeer 1080 possum bait in the northern South Island high country*. www.ospri.co.nz/assets/ResourcePDFs/Manaaki-Whenua-Landcare-Research-Molesworth-Report-2021.pdf; Manaaki Whenua – Landcare Research Contract Report: LC4048;2021.

⁹ Landcare-Research. How humane are our pest control tools? In. <https://www.mpi.govt.nz/dmsdocument/4009-How-humane-are-our-pest-control-tools> MAF Biosecurity New Zealand; 2010.

¹⁰ Fairweather AAC, Broome KG, Fisher P. *Sodium Fluoroacetate Pesticide Information Review*. Unpublished report docdm-25427: Department of Conservation Hamilton, NZ. 112p.;2014.

¹¹ Warburton B, Eason C, Fisher P, et al. Alternatives for mammal pest control in New Zealand in the context of concerns about 1080 toxicant (sodium fluoroacetate). *New Zealand Journal of Zoology*. 2022;49(2):79-121.