



Department of
Conservation
Te Papa Atawhai

6 October 2025

Director General of Conservation
C/- Mainland Vector Contracting Limited
279 Glen Lyon Road,
Twizel

CC: permissions@epa.govt.nz
Regional Pesticides Summary
Coordinator

ATTENTION: s9(2)(g)(ii)

**PERMISSION ID DOC-1044266: LANDSBOROUGH — RAT CONTROL
OPERATION**

SUBSTANCE APPROVAL NUMBER: HSR002424

Having considered application [DOC-10436799](#) and assessment report [DOC-10440857](#), and having considered the adverse effects of the use of *sodium fluoroacetate* on DOC managed or administered land, I have decided to grant this permission subject to conditions. I consider that granting this permission is in accordance with the purpose of the Hazardous Substances and New Organisms Act 1996, recognizing the life-supporting capacity of ecosystems and the wellbeing of people and communities, and taking into account the principles and other matters in sections 5, 6, 7 and 8 of that Act. I consider that the conditions imposed in this permission are consistent with the approval of the substance.

I also consider that the controlling of pests is in accordance with the General Policy for National Parks (particularly Policy 4.3) and the Conservation General Policy (see Section 4.2). These General Policies have been given effect to through various conservation planning documents and are in line with the purposes of the conservation legislation. I also understand that the controlling of pests and the protection of indigenous biodiversity generally gives effect to the principles of the Treaty of Waitangi. I, therefore, consider that permission to control pests on public conservation land can be granted.

Permission is granted, to take immediate effect, under:

- Section 95A of the Hazardous Substances and New Organisms Act 1996
- Section 53 of the Wildlife Act 1953
- Section 54 of the Wildlife Act 1953
- Section 20 of the Conservation Act 1987
- Section 38 of the Conservation Act 1987
- Section 50 of the Reserves Act 1977
- Section 5 of the National Parks Act 1980
- Section 51A of the National Parks Act 1980
- Section 17 of the Wild Animal Control Act 1977

for the Director-General of Conservation, or any other person acting under their authority (including contractors) to apply:

- Sodium fluoroacetate, 1.5g/kg, Cereal pellet, aerially applied

on or after the date of this letter until 19 December 2025; and

to undertake the actions approved under the above Acts on the lands managed or administered by the Department of Conservation and to undertake action on the other land as authorized by the Wildlife Act 1953, on the lands listed below and shown on the **attached map**:

- 33,049.29 ha of the Cook River/Weheka to Haast River Conservation Area, a stewardship area under section 25 of the Conservation Act 1987
- 12,562.07 ha of the Hooker/Landsborough Wilderness Area, a wilderness area under section 20 of the Conservation Act 1987
- 8,902.48 ha of Mt Aspiring National Park, a national park under section 4 of the National Parks Act 1980
- 7.93 ha of Government Purpose Reserve – Acclimatisation Society – Landsborough River, a government purpose reserve under section 22 of the Reserves Act 1977
- 49.73 ha of unformed legal road administered by Westland District Council
- 5.52 ha of hydro reserve administered by LINZ

Non-toxic prefeed may be applied no earlier than the date of this letter.

This operation is approved for the purpose of rat, possum and subsequently with the aim of protecting mohua, scarlet mistletoe, southern rātā, ~~kaka and kea~~. It is recognized that this operation may kill other pests.

The permission is given subject to the requirement that the operation:

- Is carried out as generally described in the Application Form submitted 01 September 2025
- Meets the conditions shown in the attached sheets of DOC Performance Standards for Pesticide Uses Numbers #1 and #140 and the substance is used in accordance with the EPA's approval of that substance
- Has a readiness check completed to the satisfaction of Operations Manager Weheka/ South Westland prior to any application of non-toxic or toxic bait

Notwithstanding that the permission holder must comply with these requirements, it is acknowledged that indigenous animals may be killed and so this permission authorizes such deaths for the greater protection of indigenous species.

Auditing may occur to establish whether those conditions are being met. If not, the permission may be revoked and further action may ensue. It is an offence to breach this permission's conditions.

The permission may be revoked, or conditions added, deleted or otherwise varied at any time.

s9(2)(g)(ii)

s9(2)(g)(ii)
Director Operations. Western South Island

Pursuant to a written delegation from:

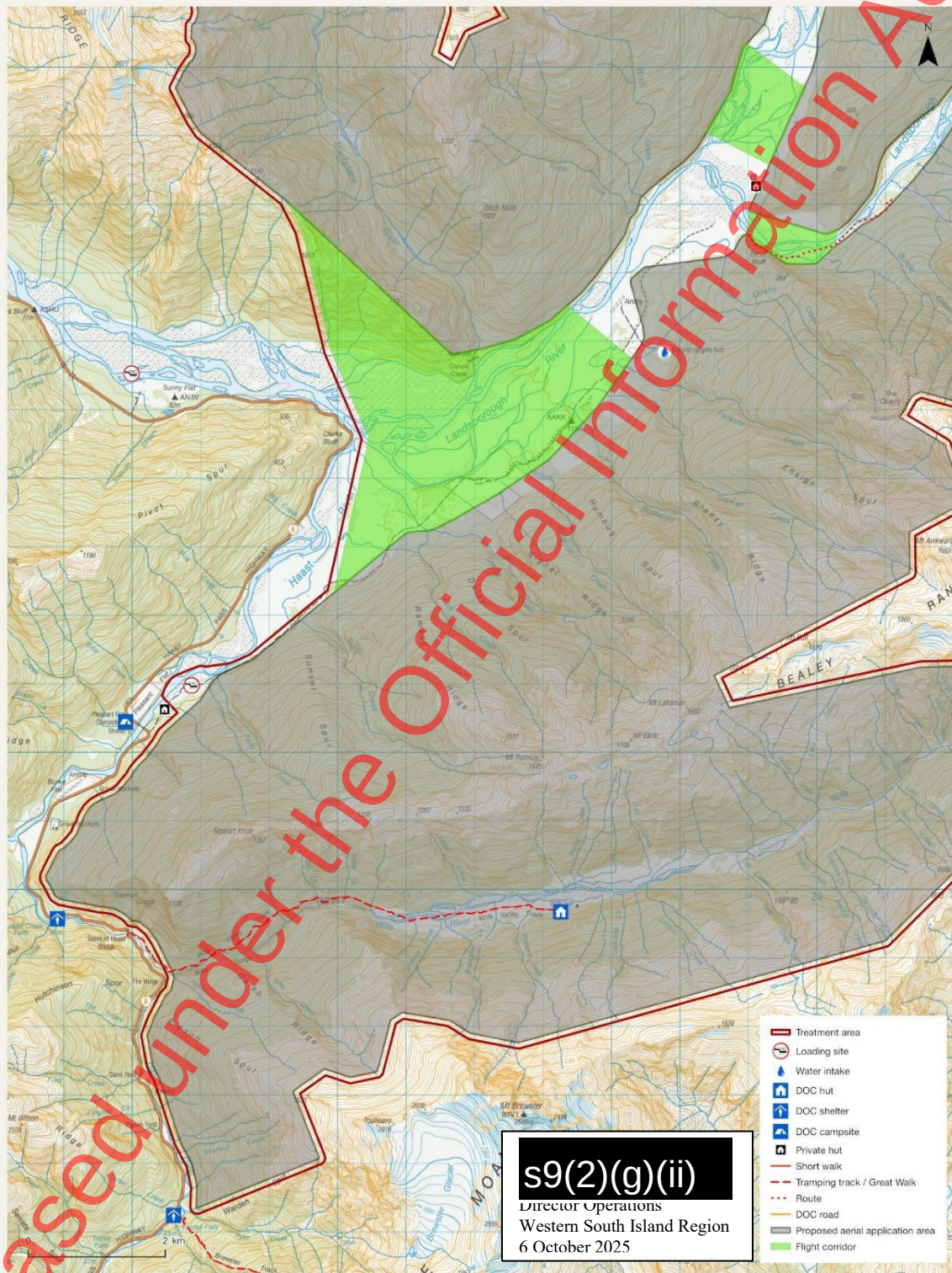
- The Chief Executive, Environmental Protection Authority for section 95A of the Hazardous Substances and New Organisms Act 1996
- The Director-General of Conservation for sections 53 and 54 of the Wildlife Act 1953
- The Director-General of Conservation for section 17 of the Wild Animal Control Act 1977
- The Minister of Conservation for section 20 of the Conservation Act 1987
- The Director-General of Conservation for section 38 of the Conservation Act 1987
- The administering body for section 50 of the Reserves Act 1977
- The Minister of Conservation for sections 5 and 51A of the National Parks Act 1980

Enc: **Map(s)**

DOC Performance Standards

Application Assessment Report [DOC-10440857](#)

Ref: [DOC-10444266](#)



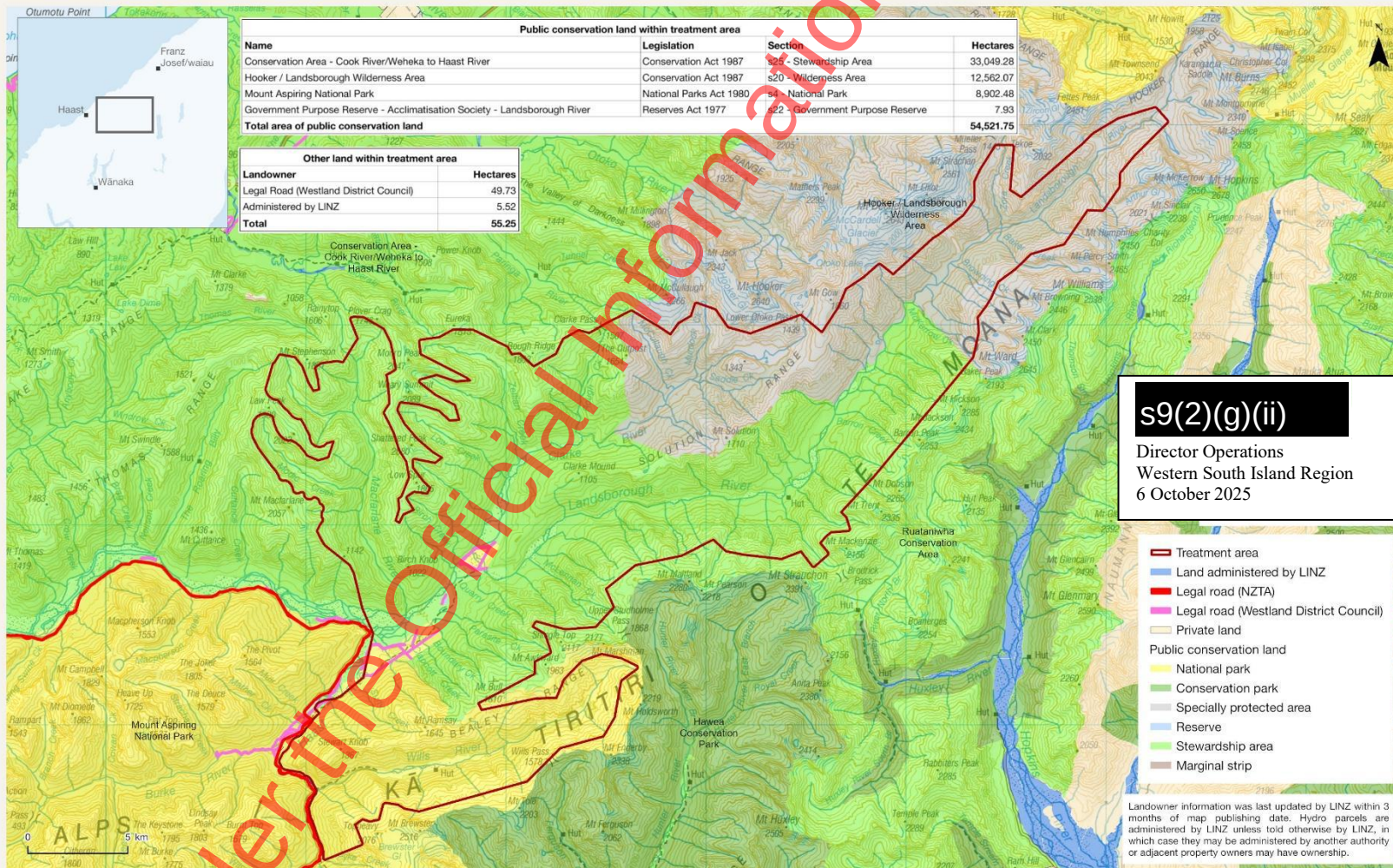
Landsborough - DOC Permission Application

Map 1a - Operational
 Aerial Predator Control 2025



Te Kāwanatanga o Aotearoa
 New Zealand Government

This map is to inform and may be unsuitable for other purposes e.g. engineering, surveying, navigation | 1:50,000 | Basemap from: | September 2025



Department of
Conservation
Te Papa Atawhai

Landsborough - DOC Permission Application

Map 1 - Landowners
Aerial Predator Control 2025
Treatment area: 54,577 ha

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

NZGD 2000 New Zealand Transverse Mercator | Not for publication nor navigation | 1:175,000 | Crown Copyright Reserved | Basemap from: | DOC, Geospatial Services | 30/09/2025

Pesticide Use #1	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (0.15% 1080 Pellet)	Target Pests: Possums, Rats
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Location of operation
Landsborough NPCP 2025



Caution Period
The estimated caution period for this operation is 8 months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards

- Compulsory for all operations*
- For operations targeting rats, prefeed with this pesticide use.
 - The DOC Code of practice for aerial 1080 in kea habitat [DOC-2612859](#) must be followed. An exemption for Performance Standard 6 has been approved so compliance with this standard of the code of practice is not required.
 - Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
 - An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
 - For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
 - The baits must be dyed green or blue.
 - The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
 - If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
 - The product must only be used as specified on the manufacturer's product label.

Information Needs

Compulsory for all operations
Nil

My approval dated 6 October 2025 is subject to these performance standards being met. Compliance monitoring may occur.
s9(2)(g)(ii)
s9(2)(g)(ii) Director Operations WSI

Pesticide Use #140	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pestex)	Target Pests: Possums, Rats
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Location of operation
Landsborough NPCP 2025



Caution Period
The estimated caution period for this operation is 8 months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards

Compulsory for all operations

10. For operations targeting rats, prefeed with this pesticide use.
11. The DOC Code of practice for aerial 1080 in kea habitat [DOC-2612859](#) must be followed. An exemption for Performance Standard 6 has been approved so compliance with this standard of the code of practice is not required.
12. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
13. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
14. For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
15. The baits must be dyed green or blue.
16. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
17. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
18. The product must only be used as specified on the manufacturer's product label.

Information Needs

Compulsory for all operations

Nil

My approval dated 6 October 2025 is subject to these performance standards being met. Compliance monitoring may occur.

s9(2)(g)(ii)

s9(2)(g)(ii)

Director Operations WSI

**Application Form for National Predator
Control Programme – Rat, Possum and Stoat
control in the Landsborough, South
Westland**

1st October 2025 –19th December 2025

Name of applicant:

s9(2)(g)(ii) – Company
Director

Company/organisation:

Mainland Vector Contracting Ltd.

Postal address:

279 Glen Lyon Road, Twizel

Phone number:

s9(2)(a)

Email address:

s9(2)(g)(ii)



Prepared by:

s9(2)(g)(ii)

s9(2)(a)

8/08/2025



Department of Conservation
Te Papa Atawhai

Released under the Official Information Act

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1. Introduction

1.1 Overview

The primary focus of this operation is to protect vulnerable native species such as mohua, scarlet mistletoe, southern rātā, kaka and kea by controlling introduced mammalian pest species including possums, rats and stoats.

It is proposed that the following pesticide uses will be applied to control possums, rodents, and stoats. Target species are rodents and possums with an expected by-kill of stoats within the operational area:

- Pesticide Use #1 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pronature Dry Forest Possum and Rodent bait)
- Pesticide Use #140 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pestex)

N.B. Both formulations of toxic bait have been included as supplier is TBC.

Permission is sought for toxic application starting on or after 1st October 2025 and ending on or before 19th December 2026

Non-toxic prefeed will be applied no earlier than 22nd September 2025.

The applicant is not seeking an exemption from the Department of Conservation, in relation to the Aerial 1080 in Kea Habitat SOP. This operation is timed to commence prior to mast seedfall, so complies with Performance Standard #5 of the SOP.

1.2 Treatment area

Public Conservation Land (PCL) Landsborough Valley, South Westland and extends into the Wills Valley, to align with the adjacent National Predator Control Programme (NPCP) Makarora operation.

The PCL identifier is Conservation Area – Cook River to Haast River
The total proposed treatment area is approximately 54,577ha.

1.3 Treatment block(s)

There is only one Aerial Application Area (Treatment Block);
Landsborough – 50,247ha (subject to confirmation through boundary flight).

**1.4
Geographical
location**

Landsborough treatment area is located in the Landsborough Valley, South East from Haast in South Westland.

The treatment area is surrounded by the following topographical constraints:

- South: Haast River and Bealey Range
- East: Southern Alps
- North Hooker Ranger
- West: Mataketake Range

**1.5
Adjacent land
tenure and uses**

Adjacent land to the treatment area is also Public Conservation Land – Cook River/Weheka to Haast River.

**1.6
Nearby residential
areas or facilities**

The locality of the treatment area (DOC permission area) is remote. The nearest settlements to the treatment area include:
33km from Makarora
48km from Haast Township

Near the operations area, the following facilities are close or within the operations area:

The huts

- Creswicke Flat Hut
- Wills Hut
- Rangers Hut (Historical)
- 1 DOC Bivy for staff use only
- 2 Rafters Camps; Harper Bluff and Toe Toe Flat
- 1 Hunters Camp at Kea Flat
- NZDA private hut at Pleasant Flat

Campground

Pleasant Flat Campground - Adjacent to the operations area, separated by State highway 6.

Tracks

Access points from Pleasant Flat and Brodrick Pass route track.
Wills Valley Track

Road

State Highway 6

1.7 Community interests

The Landsborough Valley is well known for remote recreational activities such as jetboating, packrafting and hunting. Hunting is managed by a ballot system administered by the Department of Conservation for the Landsborough-Clarke Valleys.

There are multiple airstrips throughout the valley, this provides access to recreational users.

Species of interest to the public include red deer, chamois and tahr. There are no grazing leases in the operations area.

The Central Otago Deer Stalkers also have a hut that's located close to the proposed load site. This group also recognises the importance of predator control and volunteer by manging a trap network in the Landsborough.

The Landsborough is also known for its nationally significant mohua (yellowhead) population, which has been historically threatened by increase in stoat numbers and a rat plague in 2010.

1.8 Management history

Prior to the proposed Landsborough operation 2025, several similar operations have commenced in this area over the past 20 years. The most recent being 2019 and 2024 of varying sizes. This year, the treatment area has increased to include additional area in the lower Landsborough, the Wills Valley, and in the alpine tops.

Regular monitoring is undertaken by the Department of Conservation through a trap network of 280 kill traps, baited 6 times per year. The results were successful post 2024 operation, with a 100% reduction in rat numbers and approximately 95% of mice.

2. Outcomes and targets

2.1 Conservation outcome(s)

- Assess forest health using possum-susceptible species as indicators and forest bird health using rat-vulnerable bird species.

-
- Maintain foliar cover scores of 50% or more on *Fuchsia excorticata*, *Aristotelia serrata*, *Peraxilla tetrapetala*, and *Peraxilla colensoi* by 2026.
 - Ensure less than 5% of individuals of the above species show evidence of browsing by 2026.
 - Stabilize or increase mistletoe populations (*Peraxilla tetrapetala* and *Peraxilla colensoi*) by 2026.
 - Maintain mohua (*Mohoua ochrocephala*) population estimates at or above 2021 monitoring levels.
-

2.2 Target(s)

From NPCP Outcomes Spreadsheet DOC-7200348:

1. Mustelid 21-night tracking does not exceed 10% for more than one consecutive summer.
 2. Irruptive stoat populations are always controlled to low levels in the 1st quarter of yr 2.
 3. Rat 1-night tracking index never exceeds 30%
 4. Annual-average 1-night rat tracking level is less than 10%.
 5. Possum RAI level does not exceed 2% RTC.
-

3. Consultation and consents

3.1 Consultation

Consultation has been undertaken by DOC as part of the pre-operation planning.

Iwi consultation with Te Runanga o Makaawhio will be initiated by Wayne Costello (DOC, South Westland Operation Manager), and with Ngai Tahu.

No other parties were identified as requiring consultation, but private hut representatives will be notified via personal communication and email/letter.

Mainland Vector Contracting's role within the consultation process and operational planning phase is to manage the Communications Plan with input from the Department of Conservation. Any correspondence relevant to the operation will be captured in the communications plan.

3.2**Consents**

The following documents are attached as Appendix 4:

- ☒ Public health permission (including application form)
- ☒ Other (specify): Consultation Key Fact Sheet
- ☒ Other (specify): Communications Plan

N.B. All documents related to this consent application will be secured and maintained by DOC in the document management system.

4. Methods

4.1**Treatment block 1****Pesticides—aerial (Pro Nature Dry Forest or Pestex)**

Pesticide use #1
1080 1.5g/kg Cereal Aerial

Target pest
Rodents
Possums

Brand name of pesticide	0.15% 1080 Pellets (Pronature Possum and Rodent Bait)
Lure/mask (& %)	Pre feed 6g (16mm), single cinnamon Toxic 6g (16mm), single cinnamon
Type of pre-feed (lure/dye)	Cereal single cinnamon, undyed
Number of pre-feeds (if any)	One
Nominal sowing rates for pre-feed and toxic bait	1.5kg/ha pre feed 1.5kg /ha toxic
Other details about this method	Will follow all DOC best practice and SOP

Pesticide use #140
1080 1.5g/kg Cereal Aerial

Target pest
Rodents
Possums

Brand name of pesticide	Pestex
Lure/mask (& %)	Pre feed 6g (16mm), single cinnamon Toxic 6g (16mm), single cinnamon

Type of pre-feed (lure/dye)	Cereal single cinnamon, undyed
Number of pre-feeds (if any)	One
Nominal sowing rates for pre-feed and toxic bait	1.5kg/ha pre feed 1.5kg /ha toxic
Other details about this method	Will follow all DOC best practice and SOP

4.2 Justification for proposed method Landsborough

Aerial broadcast of 1080 is the preferred method in the Landsborough Valley because it can cover large, steep, and hard-to-reach areas quickly and evenly, making it the most effective way to control pests after heavy seed fall when their numbers rapidly increase.

The valley flora has silver beech and mixed podocarp forests in the lower regions, and rimu, kamahi, and beech forests in the upper regions.

Threats to the ecosystem include rats, possums, and stoats, which prey on native bird and invertebrate species, thereby impacting habitat quality. Control measures for rats and stoats, such as valley-wide stoat traps and aerial 1080 drops, have been implemented since the late 1990s, resulting in increased bird populations, particularly mohua. This project focuses on controlling rats and possums in the Landsborough and Clarke and Wills Valleys (referred to as Landsborough 2025). Stoats will also be managed through secondary kills via poisoned rats. Scheduled for summer 2025, this operation is part of the National Predator Control Programme. National Predator Control Programme Technical Advisory Group have stated that aerial 1080 is the preferred method for rat and possum control at NPCP sites.

This is based on several factors, including:

- cost effectiveness,
- non-target impacts, and
- persistence of some other toxins in the environment.

The plan details the project's technical design and logistics for the operational phases (pre-operational, operational, and post-operational), ensuring transparency.

There are no alternative cost-effective methods for controlling rodents and possums at a scale that prevents reinvasion over largely untracked and remote terrain. Extensive published data on the relative costs and benefits of aerial baiting have not identified any threats to the long-term viability of non-target species.

5. Further information

Details of contractor or principle

Company/organisation:	Department of Conservation
Contact person:	Site Lead: s9(2)(g)(ii)
Contact number:	South Westland District s9(2)(g)(ii) s9(2)(a)

Further information

This operation is a significant component of the wider National Predator Control Programme aimed at protecting New Zealand's native wildlife from introduced predators.

The area is well understood, adjacent land occupiers and other interested parties have been identified and have been included in ongoing consultation and notification processes.

Appendix 1: DOC Performance Standards

◆ INCLUDE ONE SHEET PER PESTICIDE USE ◆ COMPLETE SHADED AREAS ◆

Pesticide Use #1	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (Pronature Possum & Rodent Bait)	Target Pests: Possums, Rats, Dama wallabies
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Location of operation
Landsborough Valley, South Westland.



Caution Period
The estimated caution period for this operation is <i>[assessor to complete]</i> months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards

Compulsory for all operations

1. The DOC Code of practice for aerial 1080 in kea habitat [DOC-2612859](#) must be followed.
2. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
3. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
4. For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
5. The baits must be dyed green or blue.
6. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
7. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
8. Prefeed with this pesticide use.
9. The product must only be used as specified on the manufacturer's product label.

Compulsory for this operation (delete those that you won't be applying to your operation)

10. Bait sowing rate must be no greater than 5kg/ha for 6gm baits (or equivalent bait density per hectare for other bait sizes).
11. Ability to undertake the operation over the New Zealand School Holidays, due to the likeliness of low use during September/October.

Information Needs

Compulsory for all operations

Nil

Operational Planning & Design Considerations

These are considerations used during planning and assessment of an operation.

Assessor to delete this section from the approved performance standard sheet for the operation.

- Use bait sowing buckets with retractable legs.
- Possum control methods current agreed best practice – Method best practice – Aerial Application of 1080 Cereal Pellets [DOC-7487883](#)
- Rat control methods current agreed best practice – Method best practice – Aerial Application of 1080 Cereal Bait [DOC-2749355](#)
- For operations targeting dama wallabies, do not repeat aerial operations within 4 years using the same bait.

My approval dated *[date]* is subject to these performance standards being met. Compliance monitoring may occur.

[Name of approving manager] [Position]

♦ ♦ INCLUDE ONE SHEET PER PESTICIDE USE ♦ COMPLETE SHADED AREAS ♦

Pesticide Use #140	Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (0.15% 1080 Pellet)	Target Pests: Possums, Rats
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Location of operation
Landsborough Valley, South Westland.



Caution Period
The estimated caution period for this operation is <i>[assessor to complete]</i> months after last date of bait application and is subject to compulsory bait and carcass monitoring. This estimated caution period cannot be reduced to less than 4 months, and must be extended if the endpoints for monitoring have not been met at the end of the period.

Performance Standards

Compulsory for all operations

12. For operations targeting rats, prefeed with this pesticide use.
13. The DOC Code of practice for aerial 1080 in kea habitat [DOC-2612859](#) must be followed.
14. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
15. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
16. For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
17. The baits must be dyed green or blue.
18. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
19. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
20. The product must only be used as specified on the manufacturer's product label.

Compulsory for this operation (delete those that you won't be applying to your operation)

21. Bait sowing rate must be no greater than 5kg/ha for 6gm baits (or equivalent bait density per hectare for other bait sizes).
22. Designate a "Safety Officer" on loading site who audits and ensures adherence to safety standards.
23. *[Add further standards as required. These could include local performance standards as well as any recommendations from Current Agreed Best Practice that you want to apply to your operation. Attach conditions from other consents as separate pages.]*

Information Needs

Compulsory for all operations

Nil

Compulsory for this operation

1. *[Add as required.]*

Operational Planning & Design Considerations

These are considerations used during planning and assessment of an operation.

Assessor to delete this section from the approved performance standard sheet for the operation.

- Apply bait in coldest months of year.
- For operations targeting possums, do not repeat aerial operations within 4 years using the same bait.
- Current Agreed Best Practice – Possum Control – Aerial Application of 1080 Cereal Pellets [docdm-341728](#)
- Current Agreed Best Practice – Rat Control – Aerial Application of 1080 Cereal Bait [docdm-29375](#)

My approval dated *[date]* is subject to these performance standards being met. Compliance monitoring may occur.

[Name of approving manager] [Position]

Appendix 2: Maps

Both of the following must be supplied:

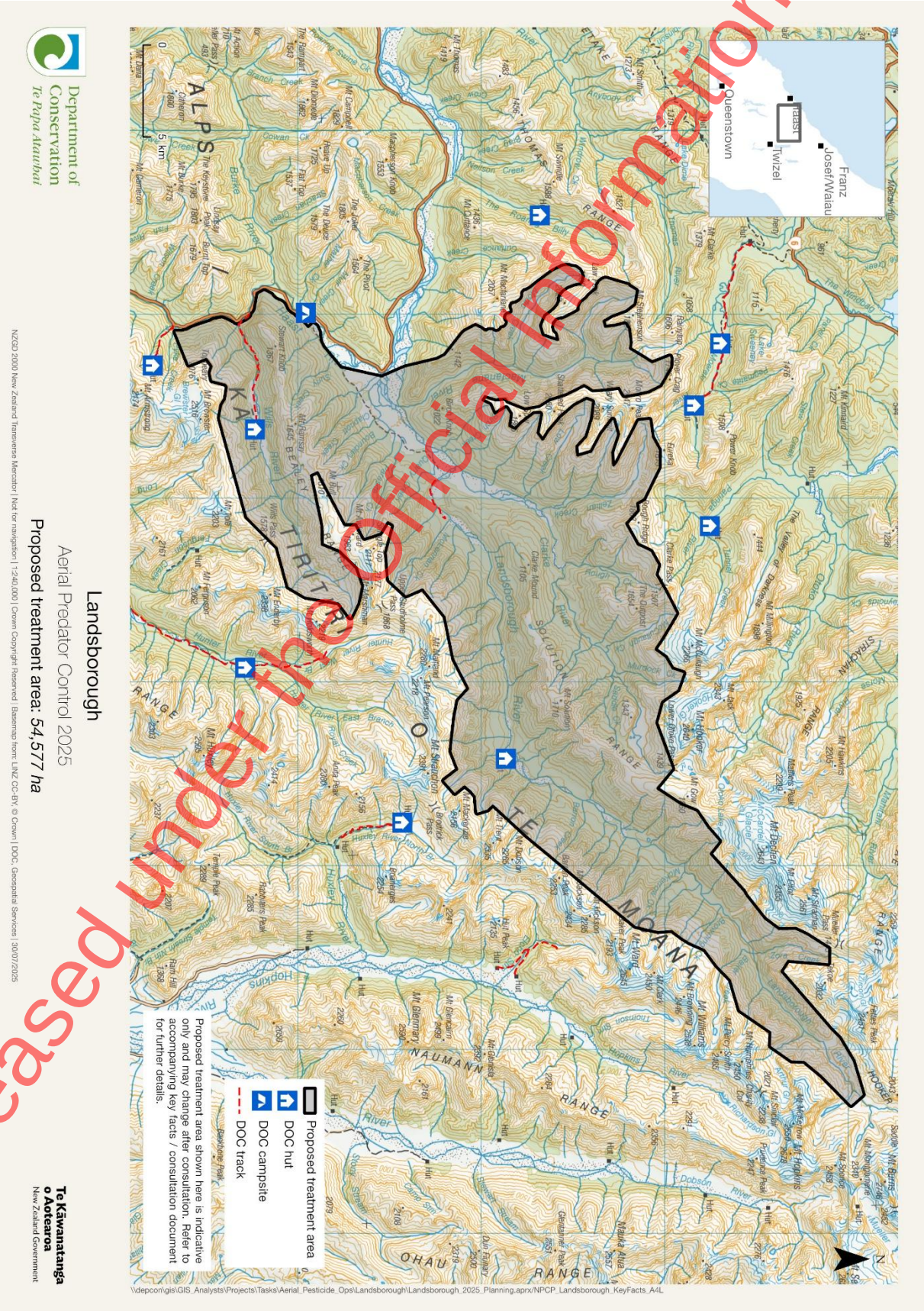
1. DOC permission map(s) as one or more image files (.JPG format preferred)
2. DOC Pesticide Summary shapefiles (**not required for DOC pest operations**)

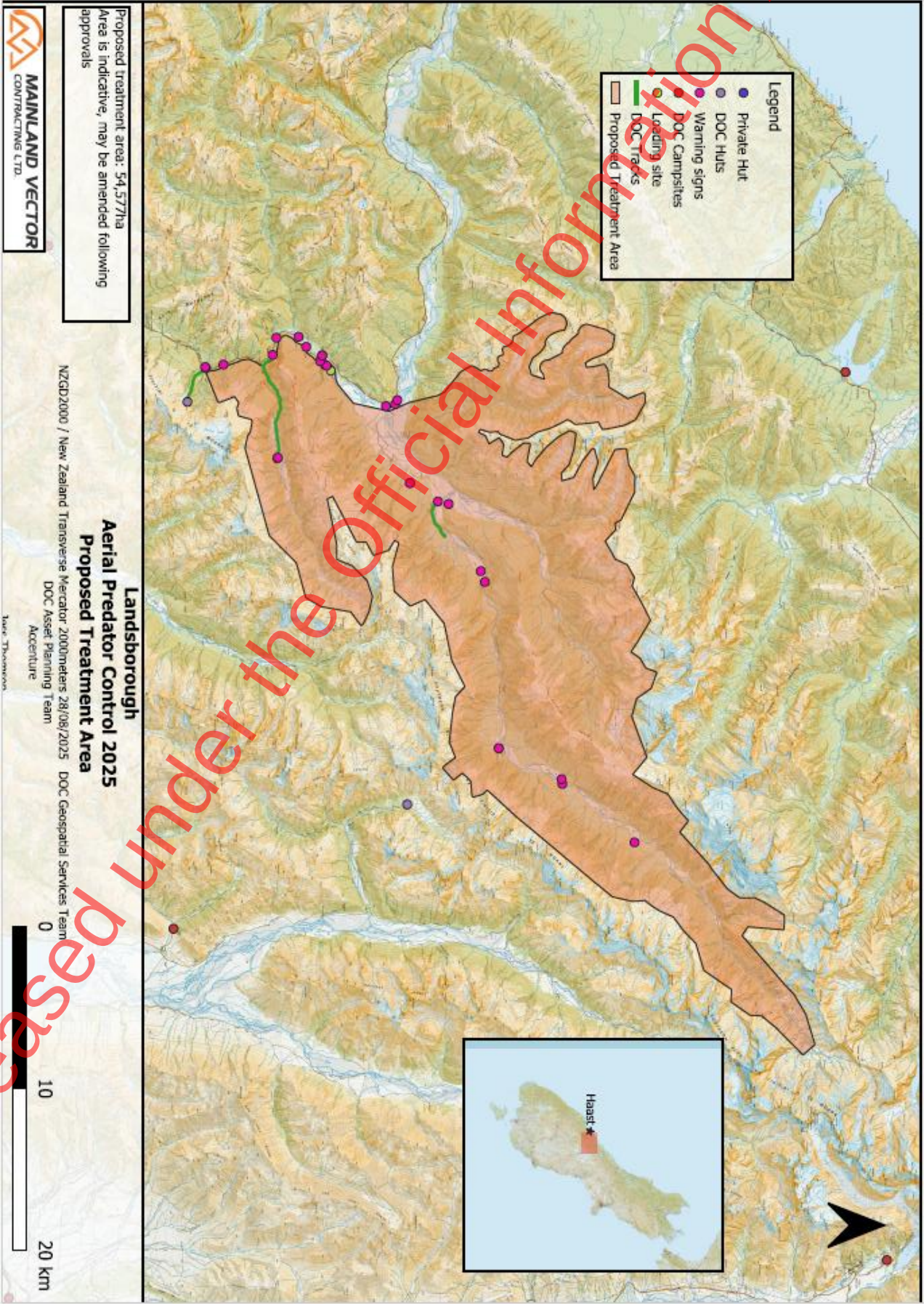
Your DOC permission map(s) must show the following as a minimum:

- The external boundary of the treatment area or those treatment blocks included in this operation
- Legal boundaries of land managed by DOC
- Name of treatment area
- Land tenure and adjacent owners, including leased land
- Any areas excluded from the treatment area (such as around public water supplies, pā sites)
- Location of any warning signs and public information signs
- Location of normal points of entry where warning signs must be a minimum size of A3
- Bodies of water (include rivers, streams, lakes, reservoirs, wetlands, coastal marine areas)
- Recreational facilities (tracks, huts, road ends, roads, picnic sites)
- Date map prepared

NOTE: 1:50,000 is the preferred scale. Use more than one map if the amount of detail becomes to visually cluttered to be clearly understood.

The DOC Pesticide Summary shapefile(s) will be published on the DOC Pesticide Summary website, initially as a proposed operation. It must be obvious which control methods are proposed for each treatment block. The shape files must also show all boundaries relating to the operation (treatment area/block, exclusion zones, no fly zone etc.) and warning sign locations. DOC pest operations are already captured in the Pesticide application so do not need to supply shapefiles with the application for DOC permission.





Aerial 1080 in kea habitat SOP – DOC-2612859

Appendix 3: Communication Record

This records every individual or group who has been consulted about the proposed operation.

If using the DOC Communication Plan/Record template, insert the Communication Record you created. The required contents are the following pages:

- Introduction
- Consultation on options (if applicable)
- Consultation on effects (if applicable)
- Toolbox

If using another format, information must include:

- The decision on consultation
- Who was consulted
- Actual dates when consultation was undertaken
- Outcomes of consultation, including any complaints and how they were addressed
- Any landowner/occupier consent conditions
- References to which resources were used for each target audience

Appendix 4: Consents

Insert copies of all consents you specified in Section 3.2.

Landowner/occupier consents are recorded in the Consultation record whether or not written consent is obtained.

Appendix 5: Assessment of environmental effects

Complete this section if an Assessment of Environmental Effects (AEE) is required by the DOC manager approving the permission. An AEE that has been prepared on the DOC RMA AEE template (docdm-96227) for a resource consent application can be attached instead if it covers all the pesticides uses in this application.

Effects on non-target native species

Target
benefit
species

Native species and threat classification below:

Species of Value		
Common name	Scientific name	Threat classification
Birdlife		
Rock wren	<i>Xenicua gilviventris</i>	Nationally Endangered
Kea	<i>Nestor notabilis</i>	Nationally Endangered
Kereru	<i>Hemiphaga novaeseelandiae</i>	Not Threatened
Whio	<i>Hymenolaimus malacorhyncos</i>	Nationally vulnerable
Kaka	<i>Nestor meridionalis</i>	At Risk - Recovering
Kakaruwai/South Island robin	<i>Petroica australis</i>	At risk - Declining
Kakariki/Yellow-crowned parakeet	<i>Cyanoramphus auriceps</i>	At risk - Declining
Mohua/Yellowhead	<i>Mohoua ochrocephala</i>	At risk - Declining
Bellbird	<i>Anthornis melanura</i>	Not Threatened
Brown creeper	<i>Mohoua novaeseelandiae</i>	Not Threatened
Fantail	<i>Rhipidura fuliginosa</i>	Not Threatened
Grey warbler	<i>Gerygone igata</i>	Not Threatened
Rifleman	<i>Acanthisitta chloris</i>	Not Threatened
Silvereye	<i>Zosterops lateralis</i>	Not Threatened
Tomtit	<i>Petroica macrocephala</i>	Not Threatened
Tūī	<i>Prothemadera novaeseelandiae</i>	Not Threatened
Other		
Long-tailed bat	<i>Chalinobus tuberculatus</i>	Threatened – Nationally critical
Powelliphanta Haast (large land snail)	<i>Powelliphanta rossiana</i> “Haast”	At risk - Declining

Flora		
Scarlet mistletoe	<i>Peraxilla colensoi</i>	At risk - Declining
Red mistletoe	<i>Peraxilla tetrapetala</i>	At risk - Declining
Southern rata	<i>Metrosideros umbellata</i>	Not Threatened
Kotukutuku/Fuchsia	<i>Fuchsia excorticata</i>	Not threatened
Halls totara	<i>Podocarpus hallii</i>	Not threatened
Kamahi	<i>Weinmania racemosa</i>	Not threatened
Coprosma wallii	<i>Coprosma wallii</i>	A risk-declining

Table 1: Native species located in the Landsborough Valley including the New Zealand Threat Classification (NZTC, 2021).

Non-target species

Moderate Risk

Common name	Species name	Threat ranking
Karoro	<i>Larus dominicanus</i>	Not Threatened
Kea	<i>Nestor notabilis</i>	Nationally endangered
Mātātā	<i>Bowdleria punctata punctata</i>	At risk - declining
Southern falcon	<i>Falco novaeseelandiae</i> "southern"	Nationally endangered
Powelliphanta Spp.	<i>Powelliphanta rossiana rossiana</i>	Nationally endangered
Morepork	<i>Ninox novaeseelandiae</i>	Not threatened
Yellow-crowned parakeet/Kakariki	<i>Cyanoramphus auriceps</i>	Not threatened
Kereru	<i>Hemiphaga novaeseelandiae</i>	Not threatened

South Island Rifleman	<i>Acanthisitta chloris chloris</i>	Not threatened
Long tailed cuckoo	<i>Eudynamys taitensis</i>	Nationally Vulnerable
Western weka	<i>Gallirallus australis</i>	Not Threatened
Sth Isl Tomtit	<i>Petroica macrocephala</i>	Not threatened
Sth Isl. Robin	<i>Acanthisitta chloris</i>	At Risk-Declining
Sth Isl. Fantail	<i>Ninox novaeseelandiae</i>	Not Threatened
Morepork /ruru	<i>Cyanoramphus auriceps</i>	Not Threatened
Yellow-crown kakariki	<i>Poodytes punctatus</i>	At Risk-Declining
Sth Isl. Fernbird	<i>Greygone igata</i>	At Risk-Declining
Australasian harrier	<i>Circus approximans</i>	Not threatened
Common skink	<i>Oligosoma otagense</i>	Not Threatened
Copper skink	<i>Oligosoma aeneum</i>	Not Threatened
Newmans Speckled skink	<i>Oligosoma newmani</i>	At Risk-Declining
Forest Gecko	<i>Mokopirirakau granulatis</i>	At Risk-Declining

Effect of operation on native species

It is expected that there will be no long-term negative effects on native species, and all will benefit with the reduction in invasives pests such as possums, stoats, rats and mice.

The proposed operation will have a significant beneficial effect on the health of the indigenous forest ecosystem in general and on specific plant and animal taxa.

Studies of native forests and birds have shown the widespread benefits of using 1080 to control rats and, subsequently possums and mustelids. The ecosystems response to control will vary between species due to the subtle impact rats and possums have through the disruption to the lifecycles of native flora and fauna.

The impacts of rats and possums in the ecosystem vary from the consumption of seeds, predation of insects, bird's eggs, chicks and nesting adult birds resulting in a ripple effect throughout the forest. The effects on the ecosystem extend from disrupting plant recruitment, predation of birds and insects that assist with pollination, to sustaining high mustelid populations that also predate on bird and insect species present in the control area.

The ecosystem is disrupted by the presence of rats and possums. Improving the breeding success of birds and nesting adult survival through the effective control of rats and other predators, improves biodiversity and will subsequently benefit the diverse ecosystems contained within the control area.

The key species the operation is protecting (Mohua) is impacted by stoats and feral cats. Targeting rats has a high impact on stoats and feral cats through secondary poisoning.

Research suggests the direct effect of 1080 toxins on invertebrates is likely to be minimal while removing known predators will also benefit the insect communities.

It is possible deaths could occur in some bird species though population recovery is normally within one breeding season.

Karoro - Five-hundred and fifty-six southern black-backed gulls (*Larus dominicanus*) were killed in an aerial 1080 operation (0.15% 1080 6g pellets at 4kg/ha following 2 prefeed applications of 6g pellets at 2kg/ha) at South Okarito in November 2021. A high proportion of the dead gulls were found at a nesting colony that was included in the treatment area, though carcasses were also found on the riverbed and coastal strip boundary of the treatment area (ZIP 2021).

Mātātā - In the 2010 study in Ianthe Forest, 36 radio-tagged South Island fernbirds were monitored during an aerially applied 1080 cereal pellet operation. 5 birds dropped their transmitters, 1 was killed by a predator

and 3 died from 1080 poisoning. Based on this, the mortality of fernbirds due to 1080 poisoning was estimated at 9.4% (2.4-22.6% 95% CI). (DOC 1080 PIR)

A total of 276 radio tagged kea have been exposed to this method over 25 operations and 33 have died from poisoning. While there is a risk to kea (Kemp et al, 2018), showed that aerial 1080 application increased the daily nest survival by a factor of 9:1

The majority of the treatment area is not classified as a kea scrounge location. However approximately 28.6% of the treatment area at the head of the Landsborough Valley is considered scrounge influenced due to the proximity to Mount Cook Village. The Aerial 1080 in Kea Habitat SOP (doc-2612859) will be followed. The intention is to deliver the 2025 operation prior to December 31st, however if the operation extends beyond 31 December an exemption from the timing part of Performance Standard 5 will be required.

The disturbance of "normal" predator-prey relationships between the introduced and native fauna caused by the aerial poisoning of rats and possums with 1080 is not clearly understood in terms of cause and effect

The overall net effect on the ecosystem is one of profound benefit due to the successful control of rats and possums, and the subsequent control of mustelids and feral cats.

Performance standards and information needs

Communication sent to affected landowners and groups utilising the treatment area, cattle and other domestic animals restricted from storage, loading, and treatment sites.

Warning signs near the operations area will include a map of the treatment area.

Outcome monitoring will occur following the operation by specialist group coordinated through the monitoring team.

DOC Performance Standards #1 and #140 – Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (0.15% 1080 Pellet)

1. The Aerial 1080 in kea habitat SOP DOC-2612859 must be followed.
2. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.

3. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
4. For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
5. The baits must be dyed green or blue.
6. The boundaries of the bait preparation and loading site are marked and loading site signs docdm-181171 erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.
7. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.
8. Prefeed with this pesticide use.

The product must only be used as specified on the manufacturer's product label.

Effects on non-target domestic and feral animals

Non-target species Non target species listed below:

- Red deer
- Tahr
- Chamois
- Domestic animals (Cattle, dogs)

Effects of operation on domestic and feral animals

As per the operation risk register, the likelihood of bait in contact with non-target species is medium. The outcome could include Sickness, fatality or secondary poisoning.

All the identified species listed are at risk from primary or secondary poisoning from 1080. 1080 poses a high risk to dogs and stock, with dogs being especially vulnerable to secondary poisoning. 1080 poisoned carcasses are toxic to dogs and will remain a risk until carcasses have completely broken down. The rate of degradation of carcasses will depend on moisture,

Performance standards and information needs

temperature and the presence of micro-organisms (PIR, DOC-25427). Larger animals such as cattle need several baits to receive a lethal dose, but deaths have been reported where animals have access to baits (PIR, DOC-25427) in larger quantities particularly at Loading Sites.

Communication sent to affected landowners and groups utilising the treatment area, cattle and other domestic animals restricted from storage, loading, and treatment sites.

Warning signs near the operations area will include a map of the treatment area.

Specific "No Dogs" signs at key entry points.

Outcome monitoring will occur following the operation by specialist group coordinated through the monitoring team.

DOC Performance Standards #1 and #140 – Sodium fluoroacetate 1.5g/kg Cereal pellet Aerial (0.15% 1080 Pellet)

1. The Aerial 1080 in kea habitat SOP [DOC-2612859](#) must be followed.
2. Flight paths to and from the bait loading zones by aircraft equipped with loaded or uncleaned bait sowing equipment must avoid: stocked paddocks, residential dwellings, and any other 'no fly zones' specified by consent providers.
3. An aircraft must not, when flying to or from the treatment area, fly over a public drinking water supply or waterway that is less than 100 metres upstream of a point of extraction from a water source for a drinking water supply (not being a water supply exclusively for stock).
4. For operations targeting possums, baits will have a mean size of 6g or more, and 95% of baits should weigh more than 4g.
5. The baits must be dyed green or blue.
6. The boundaries of the bait preparation and loading site are marked and loading site signs [docdm-181171](#) erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the area is decontaminated.

7. If there is any likelihood that farm stock has been exposed to 1080, the owner must be advised as soon as possible, and stock removed from the area.

8. Prefeed with this pesticide use.

The product must only be used as specified on the manufacturer's product label.

Further information

Further information

Approx. 15,616ha of the treatment area is defined as scrounge impacted habitat. Due to this Performance Standards 4-6 of the Aerial 1080 in Kea Habitat SOP need to be followed. As a result, an exemption from Performance Standard 5 is requested.

This operation has been triggered due to prediction of a significant mast event in 2026. It is therefore a "Nip" (premast) operation and a post mast operation is planned for 2027 if required.

Kea habitat status

- The entire block is within 'kea habitat'.
- The top of the Landsborough valley is within the scrounge area from Mt Cook, this about 15,616ha of the total 54,577ha
- This block was last treated in January 2024 so the proposed operation is within 5 years

Mast status

- Mast predicted for 2026- this is a "nip it in the bud" operation.
- There was a delta T of 1.3 to 1.77 for 2026, indicating masting is likely.

Rodent status:

- Rodent tracking undertaken 4/05/2025 indicated rats tracking 3% and mouse tracking 13%.

References

Aerial 1080 in Kea habitat SOP. Department of Conservation internal document. DOC - 2612859.

Aerial 1080 in kea habitat SOP – DOC-2612859

DOC Performance Standard #1 and #140, Department of Conservation internal document. DOC – 29353.

Landsborough - Clarke Valley Hunting (no date) Department of Conservation. Available at: <https://www.doc.govt.nz/parks-and-recreation/things-to-do/hunting/where-to-hunt/west-coast/south-westland-hunting/where-to-hunt/landsborough-clarke-valley/#:~:text=Red%20deer%2C%20chamois%2C%20thar%20and%20hares%20can%20all,it%20online.%20Dogs%20with%20a%20DOC%20permit%20only.> (Accessed: 20 August 2025).

Mokopirirakau (no date) *Mokopirirakau* / NZHS. Available at: <https://www.reptiles.org.nz/herpetofauna/native/complex/mokopirirakau> (Accessed: 11th August 2025).

(No date a) NZTCS. Available at: <https://nztc.org.nz/> (Accessed: 11th August 2025).

Operational Plan Landsborough 2025. Department of Conservation internal document. DOC – 10391604.

Department of Conservation internal post operational reporting for previous Landsborough operations.

DOC Consultation Fact Sheet - [DOC-10391618](#)

<https://www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/why-we-use-1080/>

Appendix 6:

If you need to add further appendices please copy and paste the entire heading above and then change the appendix number and title. This will ensure that the formatting is retained and the text will be transferred to the Table of Contents.

After completion of this form please remember to update the Table of Contents (right click on the table of contents for the 'update field' option).



Pesticides - Decision Support Document (DSSD) (Assessment of Vertebrate Pesticide Permission)

Application Details (Assessor to complete)	
Applicant ¹	Mainland Vector Contracting Ltd
Date received	1 September 2025
Permission Number	122510PCO
Substance approval Number (s)	HSR002424
Short description of application	Application for aerial Sodium fluoroacetate (1080) application on public conservation land for possum, rat and stoat control in the Landsborough, Weheka, Fox Glacier Office, as part of the National Predator Control Programme. The permission is part of the NPCPP prescription to protect taonga species during a beech mast response in Landsborough.
Public Health Permission ID (if applicable)	DOC-10449395 PHU permission

Document Links (Assessor to complete)	
Application Link	DOC-10436799
Resources (Assessor to complete)	
Assessor	s9(2)(g)(ii)
Permissions Advisor	s9(2)(g)(ii)
District Office/s where application assessed	Hokitika

¹ The Applicant is the Director-General of Conservation for a Departmental operation, including when a contractor is making the application on behalf of the Department. Any such permissions should be granted in the name of the Director-General and cover staff and contractors, and addressed to the Director-General, care of the contractor. Where the Application is not the Director-General, provide the External Applicant Name, which will normally be a company and should also include staff and contractors.

Decision Maker

s9(2)(g)(ii)

Director Operations, Western South Island

Assessor to complete

Purpose:

To consider the granting of permissions/authorisations for undertaking predator control (rat, possum and stoat) by aerially applying 1080 to Landborough by the Director General of Conservation.

Overview of application:

The primary focus of this operation is to protect vulnerable native species such as mohua, saddle mistletoe, southern rātā, kaka and kea by controlling introduced mammalian pest species including possums, rats and stoats.

It is proposed that the following pesticide uses will be applied to control possums, rodents, and stoats. Target species are rodents and possums with an expected by-kill of stoats within the operational area:

- Pesticide Use #11 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pro-nature Dry Forest Possum and Rodent bait)

- Pesticide Use #140 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pestex)

Permission is sought for toxic application starting on or after 1st October 2025 and ending on or before 19th December 2026

The applicant is not seeking an exemption from the Department of Conservation in relation to the Aerial 1080 in Kea Habitat SOP. This operation is timed to commence prior to mast seed fall, so complies with Performance Standard #5 of the kea COP.

Time record (Permissions Advisor to complete)

Function	Time (minutes)	Date complete
Capture	15 mins	Click or tap to enter a date.
Summary	15 mins	Click or tap to enter a date.
Understand	15 mins	Click or tap to enter a date.
Assign	15 mins	Click or tap to enter a date.
Pre-application advice (usually from local office)		Click or tap to enter a date.
Assessor	1200 mins	Click or tap to enter a date.
Permissions Advisor	320 mins	Click or tap to enter a date.
Decision Maker	60 min	Click or tap to enter a date.

Step 1 Confirm application is complete *are all documents (listed below) provided?*

Steps 1 -5: Assessor to complete.

For guidance see the Processing Applications for VFAISOP SOP [DOCDIM-1490584](#)

See also the Process Map for PPP permissions [DOC-6315017](#)

Complete application form received

Yes

Are all sections of the DOC Application Form completed to a standard that you can assess them

The application was supplied with the AFE Section completed.

Date Received:
1 September 2025

Are all the proposed pesticide use(s) accepted for use from the EPAP? **Yes**

The pesticide uses are permitted on the pesticide status list

- Pesticide Use #1 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pronature Dry Forest Bossman and Rodebait)
- Pesticide Use #140 - sodium fluoroacetate 1.5g/kg cereal pellet aerial (Pestex)

Performance standards sheets

Yes

Current performance standards sheets were supplied with the application

DOC permission maps (s) (image file or files) (es)

Yes

Does the map or maps meet the minimum standards (as stated in Appendix 2 of the [DOC Application Form](#)), including showing proposed warning sign locations and normal points of entry where warning signs must be placed?

DOC Pesticide summary shape files (N/A to DOC operations and Possum hunters using cyanide paste)

Yes

The proposed operation is set to view in the pesticide app.

Are the control methods clearly assigned to each treatment block? Do operational boundaries and warning sign locations match the DOC permissions maps (s)?

Yes

Consultation record including conditions of non-DOC landowner consents. Consultation has been undertaken with Te Rūnanga o Makāwhio, hunting groups and rafting concessionaires. The Landsborough is a remote area with low use. There are no adjoining landowners with hunting, rafting, jet boating and fishing the main activities in this area. While there are no cattle grazing concessions in the Landsborough, cattle are known to graze up to the Roaring Billy River lower in the East River, the cattle owner has been consulted and confirmed his cattle cannot cross the Roaring Billy River to access the Landsborough. Westland District Council have no concerns with the proposed control operation; they require notification as a condition of access.	Yes
All required owner/occupier consents obtained? Westland district council have no concerns about the proposed control on road reserves in the Landsborough. DOC-10450589	Yes
Was consultation undertaken with appropriate iwi/hapū? The Department has made efforts to consult with Te Rūnanga o Makāwhio, the relevant Ngāi Tahu Papatipu rūnanga for this area. Historically, Te Rūnanga o Makāwhio have responded infrequently to consultation requests regarding predator control operations, typically engaging once annually. They have previously expressed opposition to the use of 1080, while also acknowledging that such operations may still proceed in order to protect taonga species	Yes
Public health permission The PHU permission has been obtained DOC-10449395	Yes
Your confirmation email and subsequent correspondence Introductory email and request for information to answer kea technical advice DOC-10450468 Reply to request for information in response to technical advice on risks to kea. Amended application DOC-10450473 Request for updated communication plan and maps DOC-10450477	

Task Register – (Permissions Advisor to complete)

Tasks set by the Decision Maker:

No.	Task description	Accountability	Estimated time req'd to complete task (minutes)	Timeframe (date due)	Date complete	Time taken to complete task (minutes)
1	Co-ordinate processing of the application – including communicating with the Applicant and co-ordinating the completion of the Decision Support Document	Assessor	1200		30/9/2025	
2	Undertake statutory analysis of the application and overall recommendation for the Decision Maker	Permissions Advisor	320		30/9/2025	
3	Share the decision with the team members on behalf of the Decision Maker	Permissions Advisor	15		6/10/2025	
4	Share the decision with those consulted with (including Treaty Partners and the Conservation Board)	Community Ranger/anyone who has consulted	15		6/10/2025	
5	Share the decision with the applicant, EPA and Delivery Planner	Permissions Advisor	15		6/10/2025	

Step 2 Capture treatment blocks the pesticide application
Your publication of the proposed operation on the DOC Website is mandatory (N/A to DOC Operations and Possum Hunters using any other paste) The treatment area is set to view in the pest App.

Step 3 Evaluate control method
<i>Is the proposed method suited to the pest problem, treatment area and consultation outcomes?</i> Your assessment of the control method The use of 1080 at a landscape scale to control predators during beech mast events is the only recognised method to control predator interruptions at a landscape scale. Undertaking pre-mast seed fall control at sensitive sites is current NPCP Best Practice to respond to predator interruptions at sensitive sites with highly vulnerable target species. The NPCP Site Outcomes phase recommends pre seed fall and post seed germination predator control using aerially applied 1080 as the current best practice to control predator interruptions from beech mast events at this site to protect vulnerable species in this area including moa, ua, rock wren, whio, kea, kaka, long tailed bat and Powelliphanta. Haast giant land snails. This application does not include the post seed fall germination operation currently planned for 2027. The aerial application of 1080 cereal pellets are proven to be effective in reducing possum, rodent and stoat numbers when utilised by experienced operators and is a sustainable response to a beech mast for the proposed control area. Aerial 1080 has been used successfully in this area previously. The operation will also comply with the Method Best Practice for aerial baiting and the kea COP. NPCP Site Outcomes DOC-7200348
Label directions The proposed operation complies with label directions.
Summary of any technical advice received on the proposed control methods. No advice sought on methods. Aerial application of 1080 bait is the only method to control predators at a landscape scale during beech mast events as prescribed by the NPCP TAG.
Summary of any community relations - advice received. The site is a remote, low-use area that has received aerial predator control for over 20 years. For this operation, warning signage will be placed at locations where public access is possible, with some sign placement adjusted to better reflect current access points.

Rafting and hunting concessionaires have been consulted regarding their planned use of the site, including the control method chosen and managed by NZA/Central Otago and other known informal campsites. They will continue to be kept informed through the notification process.

All relevant concessionaires have been identified, with rafting and guiding parties expected to be the most affected. Feedback has been received from these groups, including one concessionaire advising of a party scheduled to visit the site in January 2026, after the operation is planned to be complete. Ongoing notifications will ensure concessionaires remain informed.

The timing of the operation has been planned to allow a buffer period before the start of the roar ballot, helping to minimise disruption to hunting activities.

Summary of any Poulti Tangahau - advice received.

Not sought

Step 4: Identify and assess risks and adverse effects

Are you satisfied that all risks and adverse effects have been identified?

Are there any gaps in the applicant's assessment of these (where the AEE Section was supplied)?

The application was amended following technical advice regarding kea. The Landsborough area was identified as being affected by recently revised kea scrounge habitat mapping, which triggered a timing restriction for this operation. When the Initial Assessment of Environmental Effects (AEE) assessed the Landsborough as remote habitat, the application was updated to align with Performance Standard 5 of the Kea Code of Practice. The discussion on potential non-target effects was also revised to reflect the updated kea scrounge status of the area.

Kea technical advice is in section 5.5.

Note: If no AEE is required, opt N/A. AEE requirements are set out in the 'status list' DOC 22655.

AEE requirements were met after amendments

Relevant points from the DOCPs Field Information Review (PIR).

There have been numerous studies examining the effects of aerial poisoning on native non-target populations over the last 20 years. 24 species of native birds, particularly threatened species, have been monitored. None of the studies have identified population level mortality, which threatened the viability of the species, although the only reliably calculated mortality rates are for kākāpō,

kiwi, kaka and fernbirds. The upper 95% mortality rates for kōkako, kiwi and kaka are all less than 3.5%. The mean mortality rate for fernbirds is 9.4%.

1080 is considered to have medium humaneness for possums, however, there has been little formal research into the humaneness of 1080 on other target species. Most deaths of pest species occur 8 – 48 hours after ingestion of a lethal dose.

All the registered target species have relatively high susceptibility to 1080. The short latent period means that bait shyness can develop in animals receiving a sub-lethal dose. Mice exhibit a marked avoidance of 1080 which is likely to result in control operation failures.

The majority of pest control operations using 1080 have target pest kills of greater than 80%.

A total of 282 radio tagged Kea have been exposed to this method and bait type over 26 operations and 36 have died from poisoning. Analyses of poisoned birds indicate Kea are at most at risk of risk of ingesting bait rather than secondary poisoning. The most significant predictors of Kea mortality appear to be proximity to sites where birds can scrounge food and the history of previous aerial 1080 operations at the site. The risks increase within 40 kilometres of a scrounge site and during first time operations. While the proposed operation has multiple scrounge sites within 40 kilometres, it has a history of aerial 1080 being used to manage pest numbers. The Department of Conservation has developed and continues to refine a code of practice (DOC (DOC-2612859)) for conducting operations in the presence of Kea. This operation will comply with this code of practice.

Analyses of poisoned birds indicate Kea are at most at risk of ingesting bait rather than secondary poisoning. The most significant predictors of Kea mortality appear to be proximity to sites where birds can scrounge food and the history of previous aerial 1080 operations at the site. The risks increase within 40 kilometres of a scrounge site and during first time operations. While the proposed operation has multiple scrounge sites within 40 kilometres, it has a history of aerial 1080 being used to manage pest numbers.

Kea are ground nesting birds which puts them at great risk of predation by mammalian pests, especially stoats. Very few Kea nesting in survival numbers (less than 10%) have been observed during seed mast induced increases in stoat populations. Stoats are likely to be a key factor in the decline of Kea nationally.

Even in areas where Kea is a predator of aerial 1080 are present, the use of aerial 1080 and the reduction of stoat numbers due to secondary poisoning is likely to benefit the Kea population. This is due to a much higher nesting success where stoat numbers are low.

A total of 47 radio tagged morepork/ruru has been exposed to this method and bait type over 6 operations and none have died from poisoning.

Twenty-one colour-banded and 5 unbanded S. Robins monitored during 2 aerial 1080 pellet operations all survived.

A total of 60 radio tagged Kaka have been exposed to this method and bait type over 4 operations and none have died from poisoning.

21 marked (8 radio-tagged and 13 banded) adult NZ Falcon were monitored through the 15% 1080 cereal pellet operations undertaken in Kāingaroa Forest during 2013-2014 by Horikoshi et al. (2018). All the marked falcons survived the operations.

Sixty-four who have been monitored through aerial 1080 pellet operations where the bait was sown over the river habitat where the monitored birds were present. Two of these birds died (T61b18). The two birds that died were from a sample of 19 radio-tagged birds from an operation on Mt Taranaki in June 2019. Only one of the 2 dead which could be tested and was found to have 1080 residue at 0.0012 µg/g in muscle tissue sample. Another 626 who have been monitored through 1080 pellet operations that had bait exclusion areas on the main rivers so if monitored birds foraged only in the main river bed they may not have been exposed to toxic bait. None of these birds died of poisoning.

Kakariki (parakeet) nests have been monitored during two aerial 1080 operations. Fifteen nests were monitored during the October 2007 Hurumui Valley operation and a further seven nests were monitored during a 1080 operation in the Dart Valley. Dead chicks in a failed nest in the Hurumui Valley operation contained 1080 residues and the female was not seen after the nest failed. All the monitored nests in the Dart Valley operation were successful, however two unmonitored Kakariki were found dead with 1080 residues in their tissues. The combined estimate of mortality of nesting parakeets from these operations was 2.27% (0.1-12 % 0.95 CI) (Rhodes et al., 2008). The authors concluded that while some Kakariki were killed during the 1080 operations, given the rate of nest predation observed in areas where no predator control was carried out, the net benefit from the 1080 operations was positive.

Thirteen radio-tagged rock wren were monitored through an operation with aerially applied 0.15% 1080 6 g pellets applied at 1.5 kg/ha in the Opaparara-Grange area of Kihurangi National Park in November 2019. All birds were alive 10 days after the bait application. Twenty days after the bait application 12 of the birds could still be tracked. Five of these were still alive, one was found dead on its nest and tested negative for 1080 residue, and another bird had been predated (likely by a falcon) (T. Rawencepers. comm.).

Invertebrate populations have been monitored during aerial poisoning operations, and none have shown significant population effects on any species studied, nor is there evidence to suggest poisoned invertebrates are a significant factor in secondary poisoning of other animals. Long term monitoring of native dunnets indicates substantial benefits to threatened populations in sites treated with aerial poisoning.

Feral deer population mortality from aerial poisoning operations targeting possums and rats has been highly variable. Across a number of 1080 cereal pellet operations deer mortality estimates were more often classed as low (0-33%) when sowing rates were at or below 1.5 kg/ha and potentially at those sites that had been previously treated within 5 years.

1080 in baits may be defluorinated in 1-2 weeks under favourable conditions. However, under less favourable conditions breakdown may take several weeks and, in extreme cold and drought, 1080 residues could persist in baits for several months.

Degradation of 1080 in soil and sediments taking 1-4 weeks under favourable conditions.

Water samples have been collected from streams following numerous pest control operations using 1080. 96.6% of these samples contained no residues of 1080. Where residues were found most of these had less than 1 µg/l 1080.

While plants can take up 1080, it is unlikely to be in large amounts if taken up, and 1080 residues persist less than 38 days in plants.

1080 has a relatively short half-life in sub-lethally dosed animals and it is metabolised and eliminated from living animals within days. However, it can persist in carcasses for months. The rate of degradation of 1080 in carcasses will depend on moisture, temperature and the presence of micro-organisms.

The risks 1080 operations pose to aquatic species is considered very low. Fish are very tolerant to 1080. Additionally, 1080 contamination of water is rarely found during 1080 operations and is at an extremely low level when it has occurred. No mortality of longfin eels, kōaro or upland bunnies was observed during experiments where high densities of cereal 1080 pellets were placed in water just upstream of them. Eels and kōaro have survived experimental feeding of cereal 1080 pellets, and eels have survived feeding on possum tissue containing 1080. There have also been no detectable effects on aquatic invertebrate communities in field studies when 1080 bait boxes were placed at high densities in streams.

New Zealand lizards feed mostly on insects and theoretically might be at risk of secondary poisoning. Spron (1993) found Australian experiments strongly suggest that, given their high tolerance, lizards would not be able to consume enough 1080 in insects or other animals to receive a lethal dose.

Current studies indicate increasing bat populations in both varieties in areas with reduced mammalian pest numbers. Short-tailed and long-tailed bats were monitored following several aerial 1080 operations (Eglington valley, Kēpēke Moumains, iwi) no adverse effects detected. Populations continued an upward trend.

Summary of any technical or district advice received

Technical advice received is in section 5.5

The site is a low-use site with a long history of predator control to protect vulnerable species, particularly mohua.

Cattle are still grazed in the lower Haast River, but they cannot access the Landsborough due to the depth and flow of the Roaring Billy River.

Other resources consulted (specify)

- Poutu, N.; Fairweather, A.A.C.; Broome, K.G. 2021: Sodium Fluoroacetate Pesticide Information Review. Version 2025/1. Unpublished report [DOCDM-25427](#), Department of Conservation, Hamilton, NZ.
- The Code of practice for aerial 1080 on Kēhū habitat at [DOC-2612859](#)
- Method Best practice for National Predator Control Programme Aerial 1080 baiting Version 2 April 2024 [DOC-2749355](#)
- Rat control methods current agreed best practice – Method best practice – Aerial Application of 1080 Cereal Bait [DOC-2749355](#)
- NPCP Site Outcomes [DOC-7200348](#)

Your assessment of technical risks and adverse effects

Technical risks associated with the operation are considered low. The proposed nominal spraying rate of 1.5 kg/ha for both prefeed and toxic bait aligns with best practice for 1080 cereal pellet operations. The two-phase approach is recommended by the National Predator Control

Programme Technical Advisory Group (NPSTAG) AG) is designed to achieve effective outcomes.

These methods have previously been implemented successfully during past beech mast events, resulting in reductions in rodent, possum, and subsequently stoat populations, thereby mitigating the impacts of predator irruption in this area.

Undertaking predator control both prior to seed fall and following seed germination is recommended for this site. This timing helps reduce the risk of attempting control while rodents are actively breeding in response to an abundant, high-energy food source (beech seed), which can significantly reduce bait uptake and operational effectiveness.

[DOC-7200348](#)

Your assessment of non-technical risks (e.g. *high public use, consultation outcomes*)

The site is a remote, low-use area with a long history of predator control operations. Rafting concessionaire activity in the area has declined, and no concessionaires have identified any scheduled trips or raised concerns regarding the proposed operation. One concessionaire noted that increased compliance costs have contributed to the reduction in guided rafting activity.

The former holder of a grazing concession continues to graze cattle in the lower Waikaiti River. He has confirmed that the cattle are unable to cross the Baring Billi River, a statement supported through direct communication with the Senior Biodiversity Ranger.

The Department is aware of the Rūnanga Māhaka's longstanding opposition to the use of 1080. While engagement was initiated, it occurred late in the planning process, which limited the time available for a response. The Department remains open to further dialogue and acknowledges the importance of iwi perspectives in operational planning.

What is the level of risk to native fauna?

The proposed performance standards and adherence to best practice guidelines are considered sufficient to manage risks to native fauna.

While the use of toxins to control predators inherently carries some risk, these risks have been significantly mitigated through improvements in bait quality, reduced poisoning rates, strategic timing of operations during beech mast events, and the overall ecological benefit of reduced predation on native species.

The overall risk to native fauna from this operation is assessed as low. Although there is a possibility that individual protected species may be affected, research indicates that population-level impacts are minimal when using the selected pesticide. In contrast, the absence of effective predator control during mast years could result in substantial losses of taonga species due to predator irruptions.

The use of best practice methodology, compliance with the Kāi Code of Practice, and the carefully timed implementation of the operation are expected to minimise adverse

effects and deliver a net positive outcome for at-risk taonga species targeted for protection.

See technical advice below (section 5.5)

Step 5 Calculate estimated caution period and evaluate if risks and adverse effects are at an acceptable level

Will risks be managed adequately with the performance standards proposed for this operation? Include dates and outcomes of any discussion with the applicant.

Estimated caution period for all the pesticide use(s)

PU#1 & 140 (sodium fluoroacetate 0.15% cereal pellet aerial). Caution period is set at 8 months after bait application as recommended in the CP Calculator (d (v) site if NO (>600mm rainfall (p) pa) and mean temp in the 6 months following the operation is 10 degrees (N)). The minimum caution period for this pesticide use is 4 months. Bait and carcass monitoring is required.

If bait/carcass breakdown monitoring shows red points have not been met, the caution period will be extended accordingly as per SOP.

How well does the proposed operation manage potential risks to native fauna?

The DOC performance standards for this operation are adequate to manage risks to native fauna. These include standards around bait type, size, lure, colour and the low nominal application rate of 1.5kg per hectare.

The proposed operation is planned using best practice and to provide the maximum benefit to native species by interrupting the predator irruption cycle associated with beech mast events.

The Code of practice for aerial 1080 in Kāhaka habitat (Ka-COP) applies as ka are present within the operational area. The operation is compliant with the Ka-COP.

See DOC specialist advice below re ka risk and compliance with the Ka-COP.

How well are other potential risks managed (other than to native fauna)?

The site is a remote, low-use area that has experienced more frequent predator control operations in response to recent beech mast events. Access to the operational area is limited, with the primary entry point into the Landsborough Valley restricted during bait application due to the location of the loading site. Any visitors wishing to use the 4x4 access track walking track must pass through this site. These visitors will be guided through the area and informed of the associated risks before continuing into the valley, should they choose to proceed.

Consultation has confirmed that key concessionaires currently have no concerns regarding the proposed operation and do not have plans to bring clients into the control area prior to the end of December. Ongoing notification will ensure concessionaires are kept informed should their plans change.

Warning sign locations were reviewed and updated this year to ensure coverage of all relevant access points into the control area. Adjustments were made to reflect current patterns of access.

A non-sowing buffer has been applied along the state highway to further reduce potential risks to the public.
Are you satisfied with the proposed warning sign locations and number of points of entry? A3 warning signs are proposed at strategic locations to inform the public
Summary of any technical or community relations advice received Technical advice was sought to ensure compliance with the Kea Code of Practice (COP). The application was initially submitted with proposed end date of 30 March 2026. However, the Landsborough area has since been identified as a scrounge-affected habitat, which introduces a timing restriction under Performance Standard 5 of the Kea COP. This standard requires that operations in scrounge-affected habitat be completed by the end of December in the year preceding a been mast seed fall event. Accordingly, the application was amended to meet this requirement. The proposed operation represents the first phase of a two-phase approach, with a follow-up post-seed germination operation planned for 2027. This phased strategy is designed to meet the standards outlined in the Kea COP and to maximise protection for kea and other native species during mast-driven predator irruption events. Technical advice kea COP compliance DOC-10450796 NPCPS Site Outcomes DOC-7200348
Public health permission, including application for sighted (if provided a date of application) The operational planning is compliant with the public health permission.
Other resources consulted (specify) PHU permission. DOC-10449395 NPCPS Site Outcomes DOC-7200348 Landsborough operational plan DOC-10391604
Which additional performance standards should be applied and why? No additional performance standards are required for this operation. Compliance with the compulsory Kea Code of Practice (COP) already imposes stringent requirements that effectively minimise risks to kea, while supporting opportunities for successful breeding through reduced predation pressure. The strict conditions outlined in the Kea COP—covering bait specifications, sowing dates, and operational timing—also contribute to managing risks and enhancing outcomes for other at-risk taonga species during mast events.

Established mitigation measures, including warning signage and track and visitor management plans, have been successfully implemented in previous operations within this area and will continue to be used to manage public safety and reduce risk.

Please list any recommended exemptions or extra conditions specific to this operation here.

The end date will be set at 19 December to meet performance standard 5 of the kea COP and to match the PHU permission end date.

Locations

The operation has been applied to at the following location(s):			
Public Conservation Land title	Land status	Conservation Management Planning Document(s)	Area ((Ha))
Cook River/Waikato Haas River Conservation Area	S25 Conservation Act 1987	Westland Conservation Management Strategy 2010	33,049.29 ha
Hooker/Landsborough Wilderness Area	S20 Conservation Act 1987 <i>Wilderness Area</i>	Westland Conservation Management Strategy 2010	12,562.07 ha
Mt Aspiring National Park	S4 National Parks Act 1980	Westland Conservation Management Strategy	8,902.48 ha
Other Land			
Government Purpose Reserve (Landsborough River)	S22 of the Reserves Act 1977	Acclimatisation Society	7.93 ha
Legal Road (unfenced)		Westland District Council administered	49.73 ha
Hydro Reserve		LINZ administered	5.52 ha

Consultation by DOC with Māori - To be completed by the Assessor

Brief analysis/outcome of consultation:

Te Rūnanga o Mākaawhio have not responded to our recent attempt to engage in consultation regarding potential effects. This is not uncommon, as they have previously expressed their opposition to the use of 1080.

	to the Department. The Department acknowledge that responses to consultation efforts on predator control within their rohe have been infrequent, and we remain open to engagement should they wish to provide feedback.
For detail, please refer to Communication Plan:	DOC-10391570

Analysis of the Principles of the Treaty of Waitangi –

To be completed by the Permissions Advisor

Use this section if required to analyse the application and the results of consultation with Treaty Partners against the principles of the Treaty of Waitangi. Note that if asked to complete this section, you should consider seeking a legal review of this section – the legal review must be tasked by the Decision Maker.

Section 4 of the Conservation Act 1987 states 'This Act shall be so interpreted and administered as to give effect to the principles of the Treaty of Waitangi. This is applied to all Acts administered by DOC.

The key principles of the Treaty of Waitangi that apply to DOC work are:

1. **Partnership** – mutual good faith and reasonableness. The Crown and Māori must act towards each other reasonably and in good faith;
2. **Informed decision-making**: Both the Crown and Māori need to be well informed of the other's interests and views;
3. **Active protection**: The Crown must actively protect Māori interests retained under the Treaty as part of the promises made in the Treaty for the right to govern;
4. **Redress and reconciliation**: The Treaty relationship should include processes to address differences of view between the Crown and Māori.

Discussion:

The purpose of the application is to protect tangā flora and fauna species within the rohe of Te Runanga Mākaawhio.

Te Runanga Mākaawhio have not responded to our recent attempt to engage in consultation regarding potential effects. This is not uncommon, as they have previously expressed their opposition to the use of 1080 to the Department. The Department acknowledge that responses to consultation efforts on predator control within their rohe have been infrequent, and we remain open to engagement should they wish to provide feedback.

These efforts coordinated by the Minister and the Director General using established pest control methodologies have been shared with iwi, whānau and hapu. This sharing has

enabled informed decision making and has ensured that the views and interests of tangata whenua have been heard and acknowledged.

The preservation of taonga flora and fauna species is active protection in accordance with the treaty and consistent with post-settlement commitments at place.

To be completed by the Permissions Advisor

Are there any specific post-settlement obligations that relate to the application area? Detail on individual treaty settlement commitments can be found here:

Intranet -> Our Work -> Treaty Relationships -> [Treaty Settlement commitments](#)

Discussion:

There are no known post-settlement obligations which impact the proposed operation or how iwi are engaged on the pesticide activity outside of the standard consultation process.

Statutory Analysis – To be completed by the Permissions Advisor

Hazardous Substances and New Organisms Act 1996 (HSNO Act)

Under the HSNO Act, the Environmental Protection Authority (the Authority) has approved the use of certain VTAs but has imposed a requirement that:

No person may apply or otherwise use this substance on land administered or managed by the Department of Conservation unless the person first obtains a permission from the Authority.

All persons exercising powers also to achieve the purpose of the HSNO Act as set out in section 4:

The purpose of this Act is to protect the environment, and the health and safety of people and communities, by preventing or managing the adverse effects of hazardous substances and new organisms.

1. When exercising the power of decision to achieve the purpose of the Act, are the principles of section 5 recognised and provided for by doing:

- (a) the safeguarding of the life-supporting capacity of air, water, soil, and ecosystems;
- (b) the maintenance and enhancement of the capacity of people and communities to provide for their own economic, social and cultural well-being and for the reasonably foreseeable needs of future generations.

Yes / No

Discussion:

The proposed activity concerns the use of pesticide on public conservation land for pest control purposes. Pests targeted include invasive and introduced species which are known to adversely impact the environment and the *life-supporting capacity of air, water, soil, and ecosystems*. The targeted elimination of pests through the use of pesticide is likely to enhance the economic, social and cultural well-being of communities negatively impacted by the presence of pests.

The proposed activity is consistent with Section 5 of the Hazardous Substances and New Organisms Act 1996.

2. When exercising the power of decision to achieve the purpose of the Act, have the matters in section 6 been taken into account, being:

(a) the sustainability of all native and valued introduced flora and fauna:

Discussion:

The use of aerially applied 1080 will promote the sustainable management of valued native flora and fauna. The purpose of this operation is to reverse the decline of native species. It is possible that this could occur in some bird species though population recovery is normally within one breeding season. The control of pests falls within the scope of sustainable management.

Yes/No

(b) the intrinsic value of ecosystems:

Discussion:

Pest control measures are essential to ensure that the condition of New Zealand's native ecosystems is maintained in order to ensure the ongoing survival of native and valued species and the protection of indigenous biodiversity. 1080 is the only tool currently available to achieve rapid and effective pest control in difficult terrain, and is, in this case, critical to ensuring the sustainability of native and valued introduced flora and fauna and the intrinsic value of ecosystems.

Yes/No

(c) public health:

Discussion:

Adverse effects can be adequately managed by the controls and by the overall management regime for 1080. The Ministry of Health is responsible for ensuring that the provisions of the HSNOC Act are complied with where it is necessary to protect public health. The EPA has delegated the function of granting permissions for the use of selected VTAs to medical officers of health and health protection officers who are also warranted HSNOC enforcement officers. Human health is therefore also considered through the public health permission.

Yes/~~No~~

(d) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, valued flora and fauna, and other taonga:

Yes/~~No~~

Discussion:

The relationship of Māori culture, traditions, ancestral land, and the value placed on flora and fauna as taonga has been considered through consultation on the proposed activity. Iwi were consulted and have been kept informed by District Office about the operation. Although Te Rūnanga Māhāwhi do not support the use of 1080, the Assessor has advised that they agree that mice, rats and stoats along with possums need to be controlled and it is worth noting that 1080 is used to remove all predators rather than ongoing operations over time.

(e) the economic and related benefits and costs of using particular hazardous substance or new organism:

Yes/~~No~~

Discussion:

The use of 1080 has significant benefits for New Zealand, particularly in relation to the environment and the market economy.

(f) New Zealand's international obligations.

Yes /~~No~~

Discussion:

The use of 1080 enables New Zealand to meet requirements of international obligations associated with animal health, biodiversity, and conservation, including the World Organisation for Animal Health Terrestrial Animal Health Code, the Convention of Biological Diversity and the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage 1972.

3. When exercising the power of decision has the precautionary approach in section 7 been taken into account being the need for caution in managing adverse effects where there is scientific and technical uncertainty about those effects?

Yes /~~No~~

Discussion:

A precautionary approach has been displayed throughout the planning and preparation of the proposed activity. The pesticides proposed for use are known to be hazardous substances and as such caution will be taken to manage possible adverse effects. The assessor has outlined mitigation practices throughout this

document which includes recommendations around caution periods, the placement of toxin warning signs and other forms of risk mitigation.

4. When exercising the powers of decision has account been taken of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi)?

Yes / No

Discussion:

Adverse effects involved in the use of substances to which this application relates have been discussed throughout this document by the assigned assessors. Conditions which will be imposed by the decision maker as part of any permission for the use of such substances are outlined in the associated permissions approval letter. Conditions noted in this letter will mitigate any possible adverse effects from the proposed activity.

5. In accordance with section 95A(3) has the following been considered:

- (a) the adverse effects involved in the use or uses of the substance to which the application relates; and
(b) the conditions (if any) that the decision maker thinks should be imposed as part of the permission.

Note: These conditions are related to conditions which are set out in the performance sheets attached to the permission as well as the conditions/requirements in the permission letter.

Yes / No

Discussion:

Adverse effects involved in the use of substances to which this application relates have been discussed throughout this document by the assigned assessors. Conditions which will be imposed by the decision maker as part of any permission for the use of such substances are outlined in the associated permissions letter. Conditions noted in the permissions letter will mitigate any possible adverse effects from the proposed activity.

6. Can a permission under section 95A of the HSWA Act be recommended?

Yes / No

Discussion:

Based on the above assessment, permission can be recommended for approval under section 95A of the Hazardous Substances and New Organisms Act 1996.

Wildlife Act 1953

7. A principal purpose of the Wildlife Act is the protection and control of wildlife within New Zealand. Any Wildlife Act authorisations can apply to the whole operational area, regardless of land ownership.

Are individual protected wildlife likely to be killed (or a death is virtually certain) in this operation, even if that is not desired?

Yes/No

Discussion:

It is well understood that the death of some protected wildlife is virtually certain to occur as part of the proposed operation. The death of protected wildlife through the implementation of this operation and others is unintended although expected due to the nature of pesticides.

8. Are conditions imposed that will limit such incidental deaths?

Yes/No

Discussion:

The associated permission letter authorising the use of pesticides will contain relevant conditions to mitigate adverse effects and limit incidental deaths.

9. In these circumstances can it be recommended that an authorisation be granted by the Director-General under section 53 of the Wildlife Act to kill protected wildlife as a result of this operation because it will, in the longer term, aid the protection of wildlife?

Yes/No

10. Section 54 enables the Director-General to authorise the killing of animals that he is satisfied are causing damage to other wildlife for a land. Are the targeted animals causing damage so that a section 54 authorisation can be granted?

Yes/No

Discussion:

Pests targeted in the proposed pesticide operation are known to cause damage to Conservation Land and other specimen protected under the Wildlife Act 1953. The Director-General is enabled to take appropriate measures and authorise the killing of animals that are causing damage to wildlife for a land.

Wild Animal Control Act 1977

11. Section 17 enables the Minister to authorise the hunting or killing of wild animals (including deer, chamois, thar, goats and pigs) on land administered by the Department.

12. Would the killing of wild animals be consistent with the Conservation General Policy, any relevant wild animal control plan, and the relevant conservation management strategy?

Yes / No

13. Can authorisation under section 17 of the Wild Animal Control Act 1979 be recommended to be granted by the Minister?

Yes // No

Discussion:

While deer, chamois, thar, goats and pigs are not the target species of the operation it is likely that individuals may succumb to ingestion of cereal baits. It is not anticipated that population of each species would be significantly impacted as this wildlife is not the target of the operation. For completeness the decision maker should authorise the killing of deer, chamois, thar, goats and pigs by poison under s17.

National Parks Act 1980

14. Does the operation area include a National Park?

Yes / No

15. If yes, note section 4(2)(b) of the Act provides:

... national parks shall be so administered and maintained under the provisions of this Act that—

except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated;

Also note the General Policy for National Parks, in particular Policy 4.1 (which recognises the importance of indigenous species and that those within national parks should be managed to prevent their loss or decline and to restore genetic integrity and diversity) and Policy 4.3 relating to management of threats to indigenous species. Policy 4.3(d) provides, for example:

iii) eradicating, where practicable, and containing and reducing the range of established introduced plants and animals, and

iv) controlling widespread introduced species where necessary to maintain the general welfare of national park indigenous species, habitats and ecosystems or to maintain scenic and landform values.

The area of National Park under discussion is part of Mt Aspiring National Park, subject to the Mt Aspiring National Park Management Plan and Mt Aspiring National Park Bylaws. It is considered that the application is inconsistent with the Mt Aspiring National Park Management Plan. National parks are areas designated for the preservation of indigenous species and the National Parks Act (1980) requires that all introduced species shall, as far as possible, be exterminated. The Department is seeking methods for animal pest control over large areas within the park and the importance of consulting with iwi community groups and landowners while planning pest control operations and how it may affect their interests.

16. Section 51A of the National Parks Act provides that the Minister may authorise a person to do anything that the Minister considers appropriate for the proper and beneficial management, administration and control of a park. The thing authorised cannot be inconsistent with the management plan for the park and must be in accordance with statements of general policy and conservation management strategy (section 4(3)).

Is the killing of the pests for the proper and beneficial management, administration and control of this National Park?

Yes / ~~No~~

Discussion:

The killing of pests for the proper and beneficial management of the parks is supported in the parks management plan as mentioned above. National Parks are areas designated for the preservation of indigenous species and the National Parks Act 1980 requires that all introduced species shall, as far as possible, be exterminated.

17. Would authorising the killing of pests be consistent with the General Policy for National Parks, any conservation management strategy, and the relevant management plan?

Yes / ~~No~~

Discussion:

As noted above the authorised killing of pests is consistent with the relevant Conservation Management Strategy and General Policy.

18. Can granting of consent be recommended under section 51A of the National Parks Act for the possible killing of introduced animals?

Yes / ~~No~~

Discussion:

The killing of introduced animals may be consented under Section 51A – the application and the assessor in this report outline methods and conditions to ensure the operation is beneficial to the National Park and ensure that an appropriate level of management control is exercised during the period to and during the operation.

19. Section 5(2) provides that no person shall, without the prior written consent of the Minister, kill any indigenous animal found within a national park. Written consent can be given if consistent with a management plan.

Is the incidental killing of native animals within the national park consistent with the management plan?

Yes / No

Discussion:

"Section 4 (2) (b) of the Act requires that, except where otherwise determined by the New Zealand Conservation Authority, indigenous (native) plants and animals shall as far as possible be preserved. Any removal of, or wilful damage to, plants is an offence unless the approval of the Minister of Conservation has been obtained in advance (section 60 (1) (d)). Any disturbance, trapping, taking, hunting, or killing of indigenous animals requires both the approval of the Minister of Conservation under section 5 of the Act and in most cases the approval of the Director-General of Conservation under section 53(1) of the Wildlife Act 1953. Under the Act indigenous animals include birds, reptiles and invertebrates".

This application is aligned with 6.3.2 objectives (1, 2 & 3) and policies (1-5), (7) and (18) of the Mount Aspiring National Park Management Plan that relate to the management of plant and animal threats, wildlife engagement and the public's participation in conservation.

The decision maker can take comfort that the proposed permit is aligned with the broad intent to manage introduced pest animals in the park. Incidental deaths of individual native animals may occur, however, population benefits shall accrue to many native animal and plant species. Conditions have been imposed to minimise where possible individual mortality.

20. Can granting of consent be recommended under section 5 of the National Parks Act for the possible killing of native animals and the killing of introduced animals?

Yes / No

Discussion:

All sections of section 5 of the National Parks Act 1980 apply and written consent can be recommended.

NOTE: If an area is a specially protected area under section 12, then a permit will be required from the Minister under section 13 and if the area is classified as wilderness area then an authorisation is required from the Minister under section 14 before activities can be undertaken in these areas. If such areas are included within the proposed operation area they need to be identified and the tests in sections 13 and/or 14 applied.

21. National Park Bylaws restrict the use of helicopters and noise in some national parks. Is it proposed that the helicopters will take off and land in any of the following national parks?

Mount Aspiring National Park 2011

Yes / No

22. If yes, is use of helicopters necessary to facilitate the park's beneficial and proper administration, control and management (i.e. is the use consistent with the GGP, the relevant conservation management strategy, and the management plan for the park)?

Yes / No

Discussion:

Used to support pest control operations and is therefore consistent.

23. Can an exemption to take off and land helicopters in the national park under the relevant National Park bylaws, be recommended to be granted by the Minister?

Yes // No

Discussion:

Not applicable, not intended to fly over, however. The landing site is not in the Mt Aspiring National Park. The operation is necessary for "the proper and beneficial management ...and control..of the park" in accordance with the Mount Aspiring National Park Bylaws 1981 s10.

10 Aircraft

- (1) Except in an emergency or where authorised by a licence or permit issued under the Wild Animal Control Act 1977 or where the Commissioner considers it necessary for the proper and beneficial management, administration, and control of the park –
- (a) no person shall land an aircraft at or take off from any place within the park that is not an aerodrome;
- (b) no person shall have an aircraft over any part of the park

Conservation Act 1987

24. Authorisation under the Conservation Act is concerned with conservation areas. Although the authorisation for "Hunting" both indigenous animals and pests can be granted under s 38, the specific tests for each type of conservation area have to be considered.

What types of conservation areas are included in the proposed operation area?
(Remove what does not apply)

Title	Section	Considerations
Conservation park	19	Natural and historic resources protected and, subject to that, facilitate public recreation and enjoyment.
Wilderness area	20	Conformity with conservation management strategy/plans and desirable or necessary for preservation of indigenous natural resources. Note restrictions in 20(1), but these are subject to Ministerial authorisation.

25. If there is wilderness area within the operation area can a recommendation be made to the Minister to grant an authorisation (noting limits on vehicle and helicopter use)?

Yes / ~~No~~

Discussion:

Section 20 (1)(a) and section 20 (2)(a) & (b) of the Conservation Act 1987 are directly relevant and applicable. The proposed pesticide operation is aligned with the relevant conservation management strategy for the place and the decision maker may authorise the operation.

26. Is the operation in accordance with the relevant tests which apply to the conservation areas (other than wilderness) within the operation area?

Yes / ~~No~~

Discussion:

The proposed pesticide application is consistent with the purpose for which the conservation areas listed above are held. Long term the natural values associated with listed conservation areas are protected and enhanced through such operations.

27. If yes, note that section 17A of the Conservation Act requires all conservation areas to be managed in accordance with the Conservation General Policy and the relevant conservation management strategy. Policy 4.4(a) recognises the importance of

indigenous species, habitats and ecosystems; and Ed Policy 4.2(b)(p) provides the following policy direction:

- i) preventing pests becoming established, including illegal and inadvertent transfers;
- ii) eradicating newly naturalised pest at places, where practicable;
- iii) eradicating, containing or reducing the range of pests that have established but not widespread, where practicable; and
- iv) controlling widespread pests where this is required to protect indigenous species, habitats and ecosystems, where eradication or containment of them is not practicable

28. Is the operation in accordance with Conservation General Policy and any relevant conservation management strategy?

Yes / No

Discussion:

The proposed pesticide operation is consistent with Conservation General Policy, National Park Management Plan and the relevant Conservation Management Strategies which supports pest eradication through appropriate measures.

The application is consistent with the Conservation General Policy and the West Coast Te Taihō Potini Conservation Management Strategy 2010 which supports pest eradication through appropriate measures.

Pest animals targeted in this operation, are considered to have a significant detrimental effect on natural values, native plants and animals and the natural communities and ecosystems. Eradication is a desirable aim to control animal pest populations and to promote the continued existence of native species.

The CMSS supports the decline and control of the pest populations using aerial poisoning and other techniques within the area. It is considered that the proposed pest control operation is consistent with both conservation management strategies as it will have positive conservation impacts including protecting at risk native species and their habitats. West Coast Regional Council has responsibilities in respect of animal pests, including possums.

Section 38

Under section 38 of the Conservation Act the Director-General may, if it is in accordance with a management plan (if any) and having regard to the safety of the public, issue permits for hunting. Hunting for the purposes of this section includes the use of poison.

29. Is there a management plan for all or some of the conservation area?

Yes / No

If yes provide the name of the management plan(s):

30. If so, would the issue of a hunting permit to kill pests and indigenous animals be in accordance with it?

Yes / ~~No~~

31. If there is no management plan, would the hunting be in accordance with the conservation management strategy and/or conservation general policy? [Note, Section 4.2 of the conservation general policy identifies the need to manage pest threats.]

Yes / ~~No~~

32. Has public safety has been provided for?

Yes / ~~No~~

Discussion:

The assessor has assessed the application including communication plan, warning signage, security and other matter.

33. Can a hunting permit under section 388 of the Conservation Act be recommended to be granted by the Director-General?

Yes / ~~No~~

Discussion:

The proposed activity is consistent with relevant criteria to recommend the approval of a hunting permit under section 388 of the Conservation Act 1987.

Conclusion

1. On the basis of the above analysis, can a permission be recommended to the decision maker?

Yes // ~~No~~

2. Is the proposed permission document consistent with the application?

Yes / ~~No~~

Discussion:

The permission document drafted by the assessor is consistent with the activities applied for in the application received from the Director-General of Conservation.

To be completed by the Assessor Make a recommendation <i>Should the application be approved or declined?</i>	
What key points should the approving manager have drawn to their attention?	The application was initially non-compliant with the Kea Code of Practices (COP) but has since been amended to meet the required performance standards. The applicant has been advised that, should the operation not be completed by the end of December 2025, an exemption to the Kea COP will need to be sought. To ensure full compliance with the Kea COP, a follow-up post-seed germination operation is planned for 2027. This second phase will be triggered if rat monitoring results from May and November 2026, or advice from the National Predator Control Programme Technical Advisory Group (NPCCPATAG), indicate that further control is necessary. Te Rūnanga Māhāwiri have not responded to the recent consultation attempt regarding the proposed predator control operation. This aligns with previous patterns of limited engagement, particularly in relation to their known opposition to the use of 1080. While their position is understood, the absence of feedback means proceeding without formal input from the Rūnanga at this stage.
Is approval or decline recommended? <i>If declined, summarise reasons. If approved, is a readiness check recommended (DOC operations only – see Pre-Operational Step 7 of the Operational planning for animal pest operations SOP)?</i>	Approval is recommended with the end date set to meet Kea COP compliance.

Recommendations and Prepared Documents - To be completed by the Assessor	
For recommended approval: <i>Attached correct draft letter of permission, DOC Performance Standards sheet(s) and map(s) of operational boundaries.</i>	DOC-10444266 Includes performance standards and maps

Recommendations and decision making – Pauline Adams, Permissions Advisor

Statutory analysis indicates that the application is not contrary to the legislation and meets relevant sections of the Hazardous Substances and New Organisms Act 1996, Wildlife Act 1953, Conservation Act 1987, and National Parks Act 1980 and the Wildlife Animal Control Act 1977. In addition to this the application is not inconsistent with Conservation General Policy 2005 or General Policy for National Parks.

Iwi comment on the proposed operation was sought via consultation. The proposed activity is consistent with Department Operational Policy and is expected to produce desired conservation outcomes through the provision of pest control which will positively impact ecosystems in the long term. Such a view is supported by the Assessor through their technical analysis of the application. Sufficient safety measures will be undertaken throughout the proposed pesticide operation and the following months.

In this case any adverse effects can be avoided, remedied, or mitigated by adherence to conditions recommended for inclusion in the authorising permissions letter in conjunction with listed conditions, it is recommended that the application is approved under the standard terms and conditions specified in the accompanying authority.

Recommendations

It is recommended that you:

1. Consider the application, and assessment report;
2. Note that the consultation undertaken by the applicant and the Department is sufficient to meet the obligation to give effect to the principles of the Treaty of Waitangi (section 4, Conservation Act);
3. Agree to grant a permission in the name of Mainland Vector Contracting Ltd, which will cover staff and contractors;

Agree // Disagree

4. Agree that the proposed permission and conditions considered the adverse effects of the use of Sodium Fluoroacetate 1080 on DOC managed land and that granting the permission is in accordance with the purpose of the HSON Act, recognising the life-supporting capacity of ecosystems and the well-being of people and communities and taking into account the principles of that Act;

Agree / Disagree

5. Agree, under sub-delegation from the Chief Executive of the Environmental Protection Authority, to grant permission under 59A of the Hazardous Substances and New Organisms Act for the use of Sodium Fluoroacetate on the land managed and administered by DOC in the operation area;

Agree / Disagree

6. Agree you are satisfied that, in the area of the operation, pests are causing damage to wildlife and land so killing of these pests in general accordance with the application will meet the purpose of the Wildlife Act;

Agree / Disagree

7. Agree, under delegation from the Director-General of Conservation, to grant an authorisation under section 54 of the Wildlife Act for the killing of mice, rats, stoats and possums in the operation area in accordance with the methods identified in the application;

Agree / Disagree

8. Agree that, for the purpose of providing greater protection for protected indigenous species, individual protected wildlife may be killed as a result of this operation even though the conditions on the permission are complied with, and that this is in accordance with the purpose of the Wildlife Act;

Agree / Disagree

9. Agree, under delegation from the Director-General of Conservation, to grant an authorisation under section 58 of the Wildlife Act for the killing of protected indigenous wildlife for the purpose of greater protection of indigenous wildlife in the operation area;

Agree / Disagree

10. Agree, under delegation from the Minister of Conservation, to grant authorisation under section 17 of the Wild Animal Control Act 1977

Agree / Disagree

11. Agree, in relation to the area of operation within the Mount Aspiring National Park, that this operation is in accordance with the purpose of the National Parks Act 1990 and is consistent with the Mt Aspiring National Park Management Plan;

Agree / Disagree

12. Agree, in relation to the area of operation within the Mount Aspiring National Park, and under delegated authority from the Minister of Conservation, to authorise under section 51A of the National Parks Act the killing of non-indigenous animals (particularly possums, rats, mice and stoats);

Agree / Disagree

13. Agree, in relation to the area of operation within the Mount Aspiring National Park and under delegated authority from the Minister of Conservation, to authorise under section 5 of the National Parks Act the killing of indigenous animals as part of this pest control operation;

Agree / Disagree

14. Agree, in relation to the area of operation within the Mount Aspiring National Park and under delegated authority from the Director General of Conservation, authorise the landing, taking off and hovering of helicopters;

Agree / Disagree

15. Agree, in relation to the area of operation that is conservation area that the hunting of animals by the use of poison is in accordance with the purpose of the Conservation Act, any conservation management plan that applies, and but the operation is in accordance with the relevant conservation management strategy and conservation general policy; and that public safety has been provided for;

Agree / Disagree

16. Agree, in relation to the area of operation that is conservation area and under delegated authority from the Director-General, to grant a permit under section 38 of the Conservation Act for hunting animals by the use of poison;

Agree / Disagree

17. Agree, in relation to the area of operation that is specially protected conservation area, being a wilderness area under the Conservation Act that the operation is in conformity with relevant conservation management strategy and you are satisfied the operation is desirable for the preservation of the area's indigenous natural resources;

Agree / Disagree

18. Agree, in relation to the area of operation that is a wilderness area, under delegation from the Minister of Conservation, to grant an authorisation under section 20 of the Conservation Act;

Agree / Disagree

19. If you have agreed to the above, sign the attached letter of Permission (which includes DOC Performance Standards sheet(s) and map(s) for operational boundaries).

- Letter
- PS sheets
- Map(s)

Legal Peer Review (legal team) – To enable a better overall understanding of issues and requirements in processing pesticide applications through PEP, please send this document to Sam Eccles for peer review. BEEDREYOU (Permission Advisor) send all documents to the Decision Maker for final Decision.

Has this been peer reviewed by legal?

Yes// No

Sam Eccles advised that unless any permission holds a potential risk then a peer review is not required. It is considered that this operation is low risk to the Dept.

Decision Maker

Decision made by:

Decision Maker to comment on the rationale behind their decision only if there is anything contentious, this can be brief, but if there are differing views between DOC staff and/or DDO and Treaty Partners, or there are multiple options available, or the decision made is different from what is recommended/requested, the rationale for the decision made must be clearly provided below in Decision Maker comments section.

s9(2)(g)(ii)

s9(2)(g)(ii) Director Operations

Pursuant to the delegation dated 15 September 2015

6 October 2025

Date

Decision Maker comments – Rationale for Decision

Approved based on the analysis contained in his report and the expected protective benefit.

ENDS