



OIA 19-E-0154 /DOC 5880931

1 April 2019

D. Le Feuvre

[fyi-request-9771-bo68bf98@requests.fyi.org.nz](mailto:fyi-request-9771-bo68bf98@requests.fyi.org.nz)

Dear D. Le Feuvre

Thank you for your Official Information Act requests to the Department of Conservation, dated March 6 and 11 March 2019.

### **Context to our response**

You have made a series of eleven separate requests in relation to our use of 1080 in our predator control programmes. One request has been transferred to the Ministry of Health, as it is more in line with their responsibilities.

In the interests of administrative efficiency, we have prepared a combined response for the ten requests, rather than preparing a separate letter for each.

Your questions are:

1. *Who imports 1080 poison into New Zealand?*
2. *Where is 1080 poison made?*
3. *What are the full ingredients in 1080 poison?*
4. *How much sugar or sweetener is in each 1080 pellet? What percentages.*
5. *I would like to know who dose the animals poisoned by the Department of Conservation belong to after they are dead? Also who do they belong to when they are alive?*
6. *Who are the people that have given authority to drop poison into New Zealand forests? I want names please.*
7. *Who does the New Zealand Department of Conservation work for? Government or the NZ public?*
8. *When does the Department of Conservation see it safe to go into a forest after an aerial operation. Do they make the public aware that is now safe for recreation again. What is the length of time for safe consumption of meat taken from 1080 areas?*
9. *I want the scientific proof that 1080 poison disappears in water?*
10. *I want all receipts and invoices on all money spent on pest free operations from end of 2017 through to end of 2018. All operation job costs throughout the year of 2017 through to 2018 and a copy of the budget for this time bracket.*

Much of the information you have requested is publicly available. Where that is the case our response points you to the relevant website where the information can be found.

In taking this approach we note that under section 18(f) of the Act an agency may refuse a request where it is determined to be either frivolous, vexatious or where the information requested is trivial. A number of your requests would appear to meet the criteria for refusal under section 18(f) were the information not already publicly available.

In this instance we have decided to assist you in finding the information you seek. We do so in the knowledge that any similar request could be refused under that section in the future.

We deal with each of your requests in turn below.

**1. Who imports 1080 poison into New Zealand?**

1080 is imported by Orillion Ltd and Pest Control Research New Zealand Ltd.

**2. Where is 1080 poison made?**

Please refer to the Environmental Protection Authority (EPA) website:  
[www.epa.govt.nz/assets/FileAPI/hsno-ar/HRE05002/HRE05002-016.pdf](http://www.epa.govt.nz/assets/FileAPI/hsno-ar/HRE05002/HRE05002-016.pdf)

*“Sodium fluoroacetate is a sodium salt of fluoroacetic acid. Technical grade 1080, which is more than 90% pure, is manufactured by Tull Chemical Co. Inc. in Alabama in the USA. Tull is the only US manufacturer. Technical grade 1080 is imported into New Zealand as a powder in 10 kg polyethylene pails (typically 500 kg shipments), for formulation into baits”.*

**3. What are the full ingredients in 1080 poison?**

Please refer to the above. Technical grade 1080 is more than 90% pure sodium fluoroacetate.

**4. How much sugar or sweetener is in each 1080 pellet? What percentages.**

This information is not held by the department. We do not manufacture baits. The bait ingredients are proprietary to the manufacturer. This request is therefore refused under section 18(g) of the OIA.

**5. I would like to know who do the animals poisoned by the Department of Conservation belong to after they are dead? Also, who do they belong to when they are alive?**

Please refer to the Wild Animal Control Act 1977 (Section 9: Ownership of Wild Animals) available on the following website [www.legislation.govt.nz](http://www.legislation.govt.nz).

**6. Who are the people that have given authority to drop poison into New Zealand forests? I want names please.**

There are many authorities involved in permitting aerial 1080 operations. Firstly, the Environmental Protection Authority (EPA) is responsible for approving the use of 1080 in New Zealand.

<https://www.epa.govt.nz/everyday-environment/1080/>

Permissions for aerial 1080 pest control operations are granted by Public Health- HSNO enforcement officers employed by District Health Units. Operations must also comply with Resource Management Regulations that are enforced by regional councils.

<https://worksafe.govt.nz/about-us/news-and-media/worksafe-new-zealand-and-1080/>

Please also note that aerial 1080 operations are carried out by a number of organizations in New Zealand, including Timberlands Ltd and OSPRI, as well as the Department of Conservation. For more information please refer to:

[www.epa.govt.nz/assets/Uploads/Documents/Hazardous-Substances/1080-reports/Annual-reports/2017-Annual-Report-1080.pdf](http://www.epa.govt.nz/assets/Uploads/Documents/Hazardous-Substances/1080-reports/Annual-reports/2017-Annual-Report-1080.pdf)

[www.mfe.govt.nz/publications/biodiversity/guidance-2017-pest-control-regulations](http://www.mfe.govt.nz/publications/biodiversity/guidance-2017-pest-control-regulations)

When aerial 1080 operations take place on lands managed by the Department of Conservation, they require permission from DOC managers. Their names have been withheld under the following sections of the of the Official Information Act 1982:

- section 9(2)(a), to protect the privacy of natural persons, including deceased people.
- section 9(2)(g)(ii), to protect officials or employees from improper pressure or harassment.

The process and requirements to obtain DOC permission can be found at:

[www.doc.govt.nz/get-involved/apply-for-permits/business-or-activity/animal-pest-control-operations/](http://www.doc.govt.nz/get-involved/apply-for-permits/business-or-activity/animal-pest-control-operations/)

Further information is available at:

[www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/pest-control/sops/processing-applications/national-standards-pest-operations.pdf](http://www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/pest-control/sops/processing-applications/national-standards-pest-operations.pdf)

**7. Who does the New Zealand Department of Conservation work for? Government or the NZ public?**

The Department of Conservation was established under the Conservation Act 1987. Please see [www.legislation.govt.nz](http://www.legislation.govt.nz)

The Act required the department to protect natural and historic heritage and provide recreational opportunities on land entrusted to its care, for future generations of New Zealanders to enjoy.

[www.doc.govt.nz/about-us/our-role/our-history/a-short-history-of-doc/born-with-a-mission](http://www.doc.govt.nz/about-us/our-role/our-history/a-short-history-of-doc/born-with-a-mission)

**8. When does the Department of Conservation see it safe to go into a forest after an aerial operation. Do they make the public aware that is now safe for recreation again. What is the length of time for safe consumption of meat taken from 1080 areas?**

The department follows EPA guidelines when communicating pesticide operations to stakeholders and the public. These are available here:

[www.epa.govt.nz/everyday-environment/1080/](http://www.epa.govt.nz/everyday-environment/1080/)

The guidelines apply to any aerial 1080 operation carried out by the department or other organisation.

Following the guidelines, the department places public warning signs at track entries before operations. Pesticide operations are also published on the department website:

[www.doc.govt.nz/nature/pests-and-threats/pesticide-summaries/](http://www.doc.govt.nz/nature/pests-and-threats/pesticide-summaries/)

Warning signs stay in place at track entries until bait or carcass monitoring indicates that pesticide residues are no longer present. The length of time this takes varies with environmental conditions. The operation will continue to be listed on the pesticide summary online, until the area is safe.

The public is cautioned not to eat animals from these areas and their buffer zones while warning signs are present and operations are listed on the pesticide summary.

Please refer to the following information on our website:

[www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/1080-safety-and-transparency/](http://www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/1080-safety-and-transparency/)

[www.doc.govt.nz/nature/pests-and-threats/pesticide-summaries/important-and-caution-notes/](http://www.doc.govt.nz/nature/pests-and-threats/pesticide-summaries/important-and-caution-notes/)

The Ministry for Primary Industries is responsible for the New Zealand Food Safety System. They publish information on food safety while hunting or collecting food.

See:

[www.mpi.govt.nz/food-safety/whats-in-our-food/chemicals-and-food/poison-residues-in-food-animals/1080/](http://www.mpi.govt.nz/food-safety/whats-in-our-food/chemicals-and-food/poison-residues-in-food-animals/1080/)

## **9. I want the scientific proof that 1080 poison disappears in water?**

The long-established scientific consensus is that 1080 is broken down in the environment, primarily by microbial activity. In water, 1080 rapidly dilutes to undetectable concentrations. As stated on our website, between 1990 and September 2018, 1380 water samples have been taken from New Zealand drinking water supplies after 1080 operations. These included streams with water intake points. Samples are taken by territorial local authorities and regional councils on behalf of the public health office and are independently tested by Landcare Research Toxicology Laboratory.

The tests used can detect the toxin at 100,000th of a gram per litre – a dilution 35 times weaker than the Ministry of Health allows in drinking water (3.5 parts per billion).

Five of the 1,380 tested samples showed harmless traces of 1080, which were all well below the Ministry of Health's contamination standards for drinking water. The levels would have diluted further within hours. The other 1,375 samples showed no trace of 1080.

Please see:

[www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/1080-and-water/](http://www.doc.govt.nz/nature/pests-and-threats/methods-of-control/1080/1080-and-water/)

The research on environmental biodegradability of 1080 has been reviewed by many agencies, including the Environmental Protection Authority (then ERMA) Reassessment of 1080 in 2007, which concluded that 1080 is biodegradable in water:

[www.epa.govt.nz/database-search/hsno-application-register/view/HRE05002](http://www.epa.govt.nz/database-search/hsno-application-register/view/HRE05002)

This conclusion was supported by the Parliamentary Commissioner for the Environment in 2011:

[www.pce.parliament.nz/publications/evaluating-the-use-of-1080-predators-poisons-and-silent-forests](http://www.pce.parliament.nz/publications/evaluating-the-use-of-1080-predators-poisons-and-silent-forests)

Recent scientific research has been focused on determining the exact microbial species that breakdown 1080 in soil and water, and how quickly they are able to catalyse these reactions.

## **10. I want all receipts and invoices on all money spent on pest free operations from end of 2017 through to end of 2018. All operation job costs throughout out the year of 2017 through to 2018 and a copy of the budget for this time bracket.**

The first part of this request, for provision of all receipts or invoices for pest operations, is refused under section 18 (f) of the OIA. This information could not be made available without substantial collation or research.

You can access the department's annual reports for 2017 and 2018, available online at: [www.doc.govt.nz/about-us/our-role/corporate-publications/annual-reports-archive/](http://www.doc.govt.nz/about-us/our-role/corporate-publications/annual-reports-archive/).

These will give you an overview of the department's pest control work, and operation costs and budgets to June 2018 and may help you to refine your request.

In making my decisions, I have considered the public interest considerations in section 9(1) of the Official Information Act.

You are entitled to seek an investigation and review of my decisions by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Amber Bill', with a stylized flourish at the end.

Amber Bill  
Director Threats, Biodiversity  
for Director-General