

## **SUBMISSION ON THE PROPOSED REGIONAL LAND AND WATER PLAN**

### **UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

Please note that submissions are required to be received by the West Coast Regional Council no later than **5.00 pm, Friday 15 October 2010.**

**To:** Chief Executive Officer  
West Coast Regional Council  
PO Box 66  
GREYMOUTH 8470  
Ph (03) 768 0466  
Fax (03) 768 7133 or scan and email to [info@wrc.govt.nz](mailto:info@wrc.govt.nz)

**Submission On:** Proposed Regional Land and Water Plan

**Name:** *[Full Name]* Animal Health Board Inc  
**Address:** *[Full Postal Address]*  
PO Box 3412  
Wellington 6140  
New Zealand

1. The specific provisions of the Proposed Plan that my submission relates to are as follows:

Rule 67, under which aerial discharge of 1080 (Sodium monofluoroacetate) to water, incidental to its application to adjacent land, is a permitted activity subject to certain specified conditions;

and

Rule 85, under which aerial discharge of 1080 to land is a controlled activity subject to certain specified conditions.

2. My submission is that:

The Animal Health Board submits in support of Rule 67 and Rule 85 of the proposed West Coast Regional Land and Water Plan, subject to a minor amendment stated in part 3 of this submission.

These rules will enable the continued controlled aerial application of baits containing the vertebrate toxic agent 1080 for the purposes of controlling possums as vectors of bovine tuberculosis under the National Bovine Tuberculosis Pest Management Strategy, pursuant to Section 88 (1) of the Biosecurity Act 1993. The Animal Health Board is the Management Agency for this strategy, pursuant to Section 84 of the Act.

Continued, effective, wide-scale possum control is required across much of the West Coast Region to protect cattle and deer herds from infection with bovine tuberculosis caused by contact with TB-infected possums. Aerial 1080 baiting provides such control across large parts of the region where conditions of terrain and vegetation cover prevent or severely limit the effective use of ground-based possum control methods.

The West Coast Region suffers disproportionately high levels of bovine TB infection in livestock compared with other regions of New Zealand. A continued, effective bovine TB control programme is essential to maintaining the viability and profitability of the region's dairy, beef and deer farming industries. Effective possum control, including controlled aerial application of 1080 baits, is an essential element of this programme.

Rules 67 and 85 of the proposed plan, along with further statutory controls on the application of 1080 under the Hazardous Substances and New Organisms Act 1996 enable effective possum control using 1080 in aerial baiting operations to be carried out with robust safeguards against any adverse effects.

Council may wish to note that the use of 1080 in New Zealand, including its use in aerial baiting operations for possum control, was the subject of a comprehensive Reassessment by the Environmental Risk Management Authority which was completed in August 2007. The Authority found that the

economic and environmental benefits of the use of 1080 outweighed any adverse effects. The Authority issued new controls on the use of 1080 and made a number of further recommendations for improvements in its use. These controls and recommendations are being implemented in Animal Health Board operations. This very robust risk assessment and risk management process should give Council every confidence that the proposed Rules 67 and 85 are appropriate.

3. I seek the following decision from the West Coast Regional Council:

That rules 67 and 85 in the Proposed West Coast Regional Land and Water Plan be incorporated into the Plan to be finally approved by Council, subject to a minor amendment as follows:

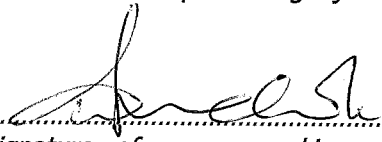
- That condition (vi) in Rule 85 be re-worded so that it matches the wording of condition (b) in Rule 67. This will enable applicators to be certified under equivalent standards offered by other certification agencies.

AND

That no further controls on the use of Sodium monofluoroacetate (1080) be introduced into the plan as a result of public submissions.

4. I do wish to be heard in support of my submission.

5. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

  
.....  
[Signature of person making submission or  
person authorised to sign on behalf of person  
making submission]

..... 12<sup>th</sup> October 2010 .....

[Date]

Title and Address for Service of  
person making submission:

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Chief Executive  
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