Department of Conservation
Te Papa Atawhai

3 April 2018

Mike Knowles
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Dear Mr Knowles

Thank you for your letter of 18 March 2018 to the Director General of the Department of Conservation. Lou Sanson has asked me to reply to your enquiry, in which you asked the following questions;

1. Why is DOC not using dee repellent in all 1080 poisoning programmes?
2. What is DOC doing to develop cheaper, more logistically efficient alternative options to the current deer repellent?

The answers to your questions are given below. In addition to this, I would like to relay some extra information in response to comments made in your letter.

You correctly noted that in 2014 an aerial 1080 operation occurred in Mount Aspiring National Park, which affected the whitetail deer herd near Glenorchy. However, you may not be aware that the Department has subsequently agreed to use deer repellent at this site. This decision was made in response to concerns raised by hunters. We have accepted that deer repellent is the best option to minimise the effect of our predator control operations on hunter's interests at this site.

You have also noted the significant by kill of red deer that occurred following the recent Molesworth aerial 1080 operation. I should note that the Molesworth operation was part of OSPRI's TB vector control programme, not DOC's predator control programme. I am informed by OSPRI that they are now reviewing the impact of the Molesworth operation on the local deer herd. I should also note on OSPRI's behalf that deer repellent was used as part of this operation, and that their planning was constrained by the need to fit in with ongoing farming operations at Molesworth.

To answer your questions;

1. Why is DOC not using deer repellent in all 1080 poisoning programmes?

There are 3 main constraints that prevent wider use of deer repellent during DOC 1080 poisoning operations;

- Cost. The current additional cost to add deer repellent to 1080 bait is roughly $6 per hectare. This represents a roughly 25% increase in the cost to the taxpayer to control possums, rodents and mustelids on public conservation lands.
- Limited production capacity. At this point there is only 1 manufacturer producing a deer repellent additive for 1080 bait (Epro Ltd in Taupo). The company has a limited

capacity to produce the bait, meaning that it is not possible to produce enough deer repellent bait for all of DOC or OSPRI's annual aerial 1080 operations.

- Logistics. Deer repellent is applied by trucking 1080 bait to Taupo, removing it from its hazardous goods compliant packaging, applying a liquid additive, drying the bait (during winter in Taupo), repackaging the bait, and then transporting it to its destination. This process takes at least 1 month, and significantly reduces the shelf life of the treated 1080 bait. It also significant increases wastage through poorly dried bait going mouldy, and causes much greater difficulty maintaining accurate application rates, due to treated bait often not flowing correctly through underslung buckets.

2. What is DOC doing to develop cheaper, more logistically efficient alternative options to the current deer repellent?

DOC is working closely with both 1080 bait manufacturers in New Zealand, Orillion in Whanganui and Pest Control Research in Christchurch, who are developing better deer repellent additives for their bait. In both cases, the deer repellent additive would be applied at the point of manufacture, removing the transport, drying, reduced shelf life and quality control issues described above.

The price of each company's deer repellent bait is yet to be determined. The cost of manufacture should be less than for Epro's product, however both companies are commercial operations and will be seeking a return on the R&D investment they are making in developing an improved deer repellent bait.

Information about the stage of development each manufacturer has reached with their new products is commercially sensitive, however I can advise that field trials are occurring to test the efficacy of improved deer repellent bait. The final stage will be for each manufacturer to obtain Animal Control and Veterinary Medicines registration of their modified bait, which is a requirement prior to the use of any vertebrate toxin in New Zealand. DOC estimates that this process will take between 12 and 24 months to complete, at which point we expect a more useable deer repellent 1080 bait to become available for our use.

Yours sincerely

Hilary Aikman
Director National Operations