

# SUBMISSION FORM

For Hazardous Substance and New Organism Applications



**Once you have completed this form**

**Send by post to:** Environmental Protection Authority, Private Bag 63002, Wellington 6140

**OR email to:** [submissions@epa.govt.nz](mailto:submissions@epa.govt.nz)

**Once your submission has been received the submission becomes a public document and may be made publicly available to anyone who requests it. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.**

<b>Submission on application number:</b>	APP202879 - PredaSTOP
<b>Name of submitter or contact for joint submission:</b>	Matt Maitland, Chair, Sanctuaries of NZ Inc
<b>Organisation name (if on behalf of an organisation):</b>	Sanctuaries of NZ Inc (SONZI)
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I wish to keep my contact details confidential

The EPA will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. We will use your contact details for the purposes of processing the application that it relates to (or in exceptional situations for other reasons permitted under the Privacy Act 1993). Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box above. We may also use your contact details for the purpose of requesting your participation in customer surveys.

The EPA is likely to post your submission on its website at [www.epa.govt.nz](http://www.epa.govt.nz). We also may make your submission available in response to a request under the Official Information Act 1982.

- I support the application
- I oppose the application
- I neither support or oppose the application

**The reasons for making my submission are<sup>1</sup>: (further information can be appended to your submission, see footnote).**

The current notification radius of 3km imposes significant and often unnecessary operational and financial burden upon practitioners. This was noted in the approved application to reduce notification radius for same active ingredient for control of stoats.

Reduction of notification radius of PAPP to target cats is therefore consistent with existing conditions to use same active to control other pests.

A minimum notification radius does not preclude broader notification if project operational managers determine appropriate. Typically project leaders know their community and the implications of exposing domestic cats to risk upon the cats, the community, and the projects relationship with these. Reduction of the minimum notification radius to 500m would allow pest control operators to choose broader notification where appropriate by less individualised communication e.g. public notice, operational signage, flyer drop.

Use of PAPP requires user to possess a Controlled Substance Licence. Users are thus deemed 'fit and proper persons' to use these substances. It is also highly likely that CSL holders for use of PAPP will also have endorsement for other toxins such as cyanide and/or 1080 and will be familiar with best practice notification and use procedures for use of toxins of concern to the community, and potentially notification requirements for use of such imposed by Medical Officers of Health. These experiences serve to inform 'good practice' for communicating with communities.

The non-target risk to domestic cats when using PAPP is not appreciably greater if targeting cats than when targeting stoats, the presentation of bait and station access will not necessarily preclude cat access and potential lethal impact to non-target (domestic) cats that may access either stoat or cat stations.

The imposition of a broad notification radius (the current 3km, or even the proposed 500m) is inconsistent with other passively set lethal cat control tools, e.g. kill trap; or active control tools with potential lethal outcome e.g. shooting or live capture trap. In these cases the pest control operator or principal determine appropriate notification area as fits their community, landscape and project objectives.

Responsibility for the welfare of domestic cats resides primarily with the owner. There is no 'right to roam' for domestic cats. Protections over domestic cats do not extend beyond the boundary of the property of the cat owner. Beyond these boundaries those who seek to control cats must give appropriate regard to the requirements of the Animal Welfare Act, any live capture regulations, firearms use regulations, and toxin use regulations. There is no requirement per se to seek permission or notify. Wandering domestic cats are also exposed to lethal threat not associated with pest control operations, e.g. vehicle strike, dog attack, territorial cat fight. These non-pest control threats are noted to illustrate why domestic cat owners should be self motivated to reduce risk of roaming and consequent negative impact on their valued cat(s).

A minimum 500m notification radius combined with CSL holder requirements largely precludes vexatious use of this substance by non-professional users (e.g. neighbourly dispute). It is worth noting that any rule or regulation is only as effective as the degree of compliance with such rules by the community or the actions of regulators to enforce and uphold these rules.

NZ scientific literature does not support a 3km notification radius. Studies vary but typically show ranging of domestic cats to mostly fall in the 1-1.5km. As with all studies there are outliers who will range further. Home range studies of cats show greatest ranging exhibited by male cats who are 'entire' (not de-sexed). Desexing of cats is widely viewed as a key tenet of

<sup>1</sup> Further information can be appended to your submission, if you are sending this submission electronically and attaching a file we accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG and JPG. The file must be not more than 8Mb.

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responsible pet (cat) ownership. Exceptions to this (i.e. entire cats owned 'responsibly') are cats kept for breeding. As such they are deemed valuable by their owners and there is extra imperative for such owners to manage the welfare of their cat(s).

Sanctuary projects, as fitting the SONZI criteria of reducing or eliminating or reducing pest threats to enable ecosystem restoration, have invested significant financial and labour resources in establishing and maintaining sanctuaries to protect our natural heritage. These resources are typically community generated e.g. voluntary labour, member funds and donations, community grants. Sanctuaries are typically careful with these resources and need not be exposed to unnecessary costs in seeking to protect their sites. Sanctuary projects are generally highly mindful of the social cost of alienating communities in which they operate.

Sanctuary projects demonstrate significant benefit to indigenous biodiversity typically with increased abundance of extant fauna and often the reintroduction of absent species which were typically extirpated by mammalian threats. Sanctuaries should be empowered to have a range of tools at their disposal to protect their investment and the biodiversity benefits accrued. They should be able to use such tools without unnecessary or onerous impediment. The current 3km notification radius is both unnecessary and onerous.

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**All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.**

- I wish to be heard in support of my submission (this means that you can speak at the hearing)
- I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

**If neither box is ticked, it will be assumed you do not wish to appear at a hearing.**

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**I wish for the EPA to make the following decision:**

To approve the application, i.e. alter the notification radius for use of PAPP to control cats in the form of PredaSTOP from the existing 3km to 500m

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