



---

## Summary of HS application **APP202879** and submission guidance

---

### Reassessment of PredaSTOP

Modified reassessment of the notification requirements for feral cat control operations

---

<b>Date Submissions Open:</b>	12 April 2018
<b>Date Submissions Close:</b>	25 May 2018
<b>Application number:</b>	APP202879
<b>Purpose:</b>	To reassess under section 63A of the Hazardous Substances and New Organisms Act 1996 ('the Act') the requirement for end users to notify any landowners, households and residents within 3km of a feral cat control operation with PredaSTOP
<b>Applicant:</b>	Connovation Ltd

---

## Purpose of this document

On 27 March 2018, the Environmental Protection Authority (EPA) received an application from Connovation Ltd. (Connovation) to reassess two substances collectively known as PredaSTOP. Connovation is seeking a change to the requirement for users to notify any landowner or householder/occupier within 3km of a feral cat control operation with PredaSTOP. This application is being publicly notified to enable the public to comment and to put all relevant information before the Decision makers.

The purpose of this document is to summarise the application and to provide guidance on the submission process.

### Application summary

**This document is a summary of the information provided in the application only. It is not the risk assessment produced by EPA staff. An EPA staff risk assessment will be completed at a later date using information from the application, submissions and other relevant sources.**

### Submission process

This document also provides guidance about the submission process. The EPA encourages submissions. Submissions will open on 12 April 2018 and close on 25 May 2018 at 5pm.

In a submission you can provide information, make comments and raise issues. In this way, you contribute to the EPA decision-making process on specific applications. We are particularly interested in hearing from you on the following matters:

- Adverse effects, especially adverse effects not identified in the application<sup>1</sup>; and
- Positive effects, especially positive effects not identified in the application<sup>2</sup>.

Further information on the purpose of submissions is available from the EPA website using the link below:  
<https://www.epa.govt.nz/public-consultations/>.

### If you have any questions, you can contact:

- The applicant directly for any question you may have on the technical information in the application, or information the applicant provided to the EPA.

The applicant's representative, Lee Shapiro, can be contacted by e-mail ([lee.shapiro@boffamiskell.co.nz](mailto:lee.shapiro@boffamiskell.co.nz)) or by phone (027 273 4342).

- The EPA about the application and/or the submission process. Please e-mail us at [Predastop.Submissions@epa.govt.nz](mailto:Predastop.Submissions@epa.govt.nz) or by phoning the application lead, Ivy (04 474 5548).

<sup>1</sup> Adverse effects can include any risks and costs associated with release of the substance.

<sup>2</sup> Positive effects can include any benefits associated with release of the substance.

## Application summary

1. Connovation has applied to the EPA for a reassessment of two substances used to control stoats and feral cats. Both contain the active ingredient para-aminopropiophenone ('PAPP'), and are collectively referred to as PredaSTOP. These substances are:
  - PAPP Paste A, with the approval number HSR100494
  - PAPP Ready to Use Bait, with the approval number HSR100496
2. The applicant obtained grounds to reassess PredaSTOP in the application APP202060, which was also used to support an earlier reassessment application, APP202323. The earlier reassessment is discussed below in the section 'Previous applications involving PredaSTOP'.
3. The EPA has applied controls to PredaSTOP to manage risks to human health and the environment. A control requirement that is important to this application is that PredaSTOP must be used in bait stations designed for the target pest.
4. The controls include a requirement that when PredaSTOP is used in a feral cat control operation, that notice of the proposed operation must be given to occupiers and owners of land, dwellings or buildings within 3 km of any intended bait station site.
5. The full control is as follows:

### Notification of operations

*(1) No person may apply, or engage to apply, this substance for the purpose of feral cat control unless that person has given notice of the proposed application to occupiers and, as far as practicable owners, of land, dwellings or buildings within 3 km of any intended bait station site.*

*(2) The notice referred to in subclause (1) must—*

*(a) be given with sufficient prior notification, no less than 24 hours, but no more than 2 months, before the proposed application and, if requested by the person notified, shall be repeated at a mutually agreed time before the proposed application; and*

*(b) specify the following:*

*(i) the approximate date on which the substance will be applied;*

*(ii) the name and nature of the substance;*

*(iii) the risks to companion animals and details of antidotes;*

*(iv) a description of the area within which the substance will be applied, including—*

*(A) the boundaries of the area; and*

*(B) districts, roads and other commonly known feature that may identify the place;*

(v) *the name, address and contact details of the person responsible for the application of the substance.*

6. The applicant has applied to reassess PredaSTOP to reduce the current 3 km notification requirement to a requirement to notify any landowner or occupier within 500 m of a bait station.
7. This reassessment is a modified reassessment under section 63A of the Act, and is only evaluating the proposed changes to the notification requirements for the substances comprising PredaSTOP. It is not a full reassessment of all aspects of the approval of the substance.
8. Connovation's application to the EPA is available on our website at:

<https://www.epa.govt.nz/database-search/hsno-application-register/view/APP202879>

## Previous applications involving PredaSTOP

9. The substances comprising PredaSTOP were originally approved in 2011 in the application HSR09058. The application documents, including the decision on that application, are available [here](#).
10. These substances have been reassessed once previously, in the application APP202323. This application re-evaluated the notification requirements for stoat control operations, but not those for feral cats. The documents for this application are available on the EPA website [here](#). The decision document, located [here](#), was later amended in the application APP203260 to correct a minor error.
11. In APP202323 Connovation sought removal of the notification requirements when undertaking stoat control operations, as it considered that the cost of meeting them was prohibitive. Connovation also sought to add a control to ensure that stoat control operations were undertaken using a stoat-specific bait station for laying baits.
12. Connovation did not seek reassessment of the notification requirements for feral cat control operations in APP202323. The decision-making committee for the application noted this, and considered that assessing the notification requirements for cats was therefore outside the scope of the application as lodged by the applicant. It was noted that this did not preclude a future reassessment of the notification requirements for feral cat control operations.
13. In its decision on APP202323, the committee considered that there were significant benefits associated with removing the notification requirement for stoat control operations. They considered that the risks to human health and the environment, taking into account the change in controls, remained negligible.
14. Accordingly, the committee approved PredaSTOP but modified the controls by removing the notification requirements for stoat control operations. It noted that the controls already required bait station design to be appropriate for the target pest, while excluding non-target species, and therefore adding an additional requirement for a 'stoat-specific bait station' for stoat control operations was not necessary.

## Content of this new application

15. Connovation has applied for a reassessment of the notification requirements for feral cat control operations. Its application says that these requirements constrain its ability to undertake feral cat control operations because of difficulties in notifying of landowners and occupiers within 3 km of control operations. It notes that the 3 km requirement in some cases means notifying thousands of households.
16. It notes that the notification control was set in the original approval to allow pet cat owners in the area to keep their pets safe and reduce the risk of those cats entering the bait control area.
17. Connovation considers that the size of the notification area, at 3 km, was derived from a study that indicated a maximum travel distance of 2.29 km for one of the cats in the study. It notes that the average distance travelled by all cats in the study was less than 200 m away from home. Citing a number of published, peer-reviewed articles relating to the distances domestic cats roam from their homes, Connovation concluded that a 500 m notification distance will be sufficient to protect domestic cats.

## The applicant's risk assessment

### *Risks*

18. Connovation consider that changing the notification requirement will not significantly alter the risks arising from use of PredaSTOP, as the bait type, delivery method, and the people who are able to apply the substance will not change. The only risk that would change is the risk to domestic cats, which Connovation considers will remain negligible.
19. Connovation considers that reducing the notification distance is unlikely to increase the risks to Māori culture or traditional relationships with ancestral lands, water, sites, wāhi tapu, valued flora and fauna, or other taonga.

### *Costs*

20. Connovation noted that there are significant costs associated with the notification requirements for feral cat control operations. It considers that if the reduction in notification distance is approved, then there will be a significant reduction in the costs involved in using PredaSTOP. It does not anticipate there being other changes in costs associated with PredaSTOP.

### *Benefits*

21. Connovation noted that feral cats are significant predators of native wildlife in New Zealand, including birds, reptiles, bats, and insects. It noted that current feral cat control operations are limited to trapping operations, and secondary poisoning of feral cats that have eaten rats killed with baits containing brodifacoum or 1080. It noted that trapping operations are labour intensive.
22. Connovation says that PredaSTOP is the only registered toxin for feral cat control in New Zealand, and they consider that current notification requirements have significantly constrained its use. It therefore considers that reducing the requirement to a 500 m notification area will allow greater use of PredaSTOP

in feral cat control operations. It considers that this will bring significant benefits to New Zealand, as control of feral cats is expected to protect and improve populations of native wildlife species in controlled areas.

## Submission guidance

23. The EPA is publicly notifying this application because we consider it will be of interest to the public. We have also notified the application in order to seek additional information regarding the effects of changing the notification requirements from a 3 km to a 500 m radius. We seek information regarding any positive or negative effects of this change, both effects identified by Connovation Ltd and any effects that were not identified in their application.

***Please let us know whether you consider that there are additional adverse effects that we should be aware of or additional information related to the described effects.***

When identifying adverse effects it is important that you provide us with comment about:

- What other adverse effects are *likely* to be caused by changing the notification requirement from 3 km to 500 m
- How *likely* these adverse effects are and their potential *scale*
- How you think the adverse effects could happen (i.e. the series of events that would have to happen for the adverse effects to occur)
- Options and proposals for managing the adverse effects
- Any uncertainty you have on the scope of the information used to assess the adverse effects.

***Please let us know whether you consider that there are additional positive/beneficial effects that we should be aware of or additional information related to the described effects.***

When identifying positive/beneficial effects, it is important that you provide us with comment about:

- Other positive effects *likely* to be caused by changing the notification requirement from 3 km to 500 m
- How *likely* these positive/beneficial effects are and their potential *scale*
- How you think the positive/beneficial effects could happen (i.e. the series of events that would have to happen for the positive/beneficial effects to occur)
- Options and proposals for ensuring the positive/beneficial effects occur or maximising the benefits
- Any uncertainty you have on the scope of the information used to assess the positive/beneficial effects.

### Other information

If there is other information you wish us to be aware of, please include this in your submission.

## Making a submission

### What is a submission?

We encourage anyone to make a submission, regardless of how much detail you are able to put in to it. In your submission, you can request to be heard by presenting your views in person before the Decision-making Committee at a hearing on the application. Further information on submissions for a hazardous substance application is available from the EPA website using the link below:

<https://www.epa.govt.nz/public-consultations/open-consultations/closing-in-on-feral-cats/>

Submissions will be made publicly available, and will be displayed on the application web page after submissions close on 25 May 2018. If you have confidential information you wish to provide, please contact the Application Lead, Ivy, by e-mail (Predastop.Submissions@epa.govt.nz) or by phone (04 474 5548).

### How to make a submission?

The EPA website provides guidance on how to make a submission. This is preferably done via the EPA submission form, but may be sent as a letter or email to the EPA. This information and the submission form can be accessed from the EPA website using the link below:

<https://www.epa.govt.nz/public-consultations/open-consultations/closing-in-on-feral-cats/>

### What happens after you make a submission?

When the submission period closes, all submissions will be summarised and made available to the Decision-making Committee, together with the EPA Staff Assessment Report.

You are entitled to bring witnesses who may speak to your submission at a hearing. If you choose this option, you should provide the EPA with a list of the witnesses, their areas of expertise, and the elements of the submission or application they will talk to.

You are also entitled to speak at the hearing in any of the three official languages of New Zealand: English, Māori or New Zealand Sign Language. Please advise the Application Lead at least two weeks prior to the hearing in order for the EPA to organise for an interpreter by contacting her at Predastop.Submissions@epa.govt.nz or by phoning 04 474 5548.

At least two weeks prior to the hearing, both the applicant and submitter(s) need to provide the EPA with copies of any information they intend to present at the hearing.

A decision will be made by the Decision-making Committee at the end of the consideration period. This decision will be made public on the EPA website.