



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

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.

Submission on application number:	APP202879 - PredaSTOP
Name of submitter or contact for joint submission:	Cath Wallace
Organisation name (if on behalf of an organisation):	Environment and Conservation Organisations of NZ Inc
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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. 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 are¹: (further information can be appended to your submission, see footnote).

ECO agrees that it is vital to control and reduce the numbers of feral cats. We also agree that domestic cats are much loved. Owners need to know that they should restrain their cats from straying and we agree that they need to take responsible measures to keep their cats at home and away from native wildlife.

We understand that the transactions costs of notifying people within a 3km range would be huge, and we also wish that PredaStop were readily available for use to control cats (as well as other mammalian predators). We find it very odd that brodifacoum is allowed to be used by all and sundry despite it being bioaccumulative. We welcome the prospect of PAPP which does not bioaccumulate, and is more humane than brodifacoum being useable.

Given the evidence of the restricted range of most domestic cats, we support the reduction of the notification requirement for the use of PAPP to 500m.

We recommend that the requirement to notify individual land owners etc within 500m be however accompanied by a requirement to also issue clear public notices in local newspapers and that social media such as "chit chat" and neighbourhood groups also be used.

Our suggestion is that this would allow for more people to find out about the poison baiting. This would have the dual benefit of allowing and incentivising more cat owners and cat carers to restrain their animals and it would also help to get people aware that it is not safe for their animals to roam, as well as that their cats can and often do cause a great deal of harm to native biodiversity.

Thus we see scope for a reduction in the costs of notification of people from 500m to 3km, and a chance to habituate cat owners to detain their cats inside, particularly at night. At the same time, use of social media and newspaper notifications would give people not individually notified, a chance to know about the slim risk that their roaming animals could be poisoned if they do not ensure it is not allowed to roam.

On the policy front, we suggest that MfE, DoC and local government work together to press for very significant penalties for those who dump pets. At one address the writer is familiar with, someone dumped 14 kittens and 4 adult cats at the end of a rural road that is plastered with "no dogs, kiwi live here" signs. This reckless behaviour can set back biodiversity protection hugely. We still do not know how many of the kittens and cats have perished and how many are now on the rampage killing native birds, reptiles and insects.

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)

¹ 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.

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

I wish for the EPA to make the following decision:

Approve the application to reduce the individual landowner and users from a radius of 3km to 500m, AND impose a further condition that a notice be inserted in local papers - say up to three - and in at least two neighbourhood social media platforms such as a local chit-chat or neighbourhood group.
