



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:	Mark Mitchell, Rod Dickson
Organisation name (if on behalf of an organisation):	Hawkes Bay Regional Council
Postal address:	██████████ ██████████
Telephone number:	
Email:	██

 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).

Hawkes Bay regional Council (HBRC) strongly supports the reduction of the notification area for Predastop from 3km to 500m. HBRC has helped conduct 3 successful large scale feral cat PAPP operations with no non-target domestic cats affected. HBRC undertook 3km notification for these operations which we believe was excessive and completely unnecessary. Staff time spent notifying is expensive and the creation of public unease is unnecessary when the risk to domestic cats is extremely low, even within a 500m distance, in a rural setting.

HBRC currently undertakes feral cat management over 36,000 ha in the region through large-scale trapping programmes. This methodology is labour intensive, less humane and less effective than large-scale PAPP operations. Trapping has the same level of risk to domestic cats as PAPP but does not require the same level of notification.

In Hawke's Bay feral cat baiting operations, PAPP baits are only out in the environment for a very limited time. Time is invested in undertaking close consultation with immediately surrounding properties where there is a potential threat to domestic cats. If a land occupier is concerned, HBRC will take every step to minimise the risk, including offering to cover the expense of housing domestic cats in a cattery over the duration of the toxic application.

HBRC has worked extensively with local farmers and Landcare Research to determine ways to reduce feral cat numbers enough to break the cycle of toxoplasmosis in sheep flocks, a disease which only occurs due to feral cats being in the environment. The protozoal disease toxoplasmosis (*Toxoplasma gondii*) is widespread throughout New Zealand and cats are the only definitive hosts of the protozoa and may shed millions of infectious oocysts in their faeces in to the environment . Since the 1950s, toxoplasmosis has been recognised as a significant cause of abortion in sheep, goats and pigs (Tompkins 2014) and it results in substantial economic and welfare impact. The cost of toxoplasmosis to the sheep industry just in the Hawke's Bay region of New Zealand was estimated at approximately \$18 million in 2014, (Walker 2014).

HBRC recognises PAPP as a very valuable tool as part of the national goal of a Predator free New Zealand and in the management of toxoplasmosis in a rural landscape. Even though PAPP is very effective, is considerably more humane than other forms of control and has minimal risk to non-target species, the current 3km notification requirement, which we believe is unwarranted, significantly restricts its use. As a result, feral cat management is not conducted over larger areas than otherwise would, having negative impacts on both the environment and primary production.

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.

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.

I wish for the EPA to make the following decision:

That the current notification area of the use of Predastop for feral cat control is reduced from 3km to 500m.
