



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:	John Pullar, Chair
Organisation name (if on behalf of an organisation):	Whakatāne Kiwi Trust
Postal address:	PO Box 186, Whakatāne 3158
Telephone number:	027 945 5494
Email:	admin@whakatane.org.nz

 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).

The Whakatāne Kiwi Trust supports Connovation's application to reduce the notification requirements for the use of PredaStop for Cats. The Whakatāne Kiwi Trust is a charitable trust which carries out kiwi management, helps co-ordinate pest control, and promotes kiwi through advocacy, education and public event in respect to the Ōhope, Kōhī Point and Mokorua Bush Scenic Reserves, Ngāti Awa kawenata and on private QEII land surrounding the Whakatāne-Ōhope townships. Prior to the reduction in notification requirements for PredaStop for stoats its was identified that the WKT would need to notify nearly 8000 (7790) landowners before this toxin could be used within its predator trap network. This was considered logistically and financially unmanageable for the WKT to carry out. In comparison the WKT regularly consults and notifies 190 adjoining neighbours about its annual rat and possum control operation. It was only after the 2015 decision to reduce the notification requirements for PredaStop for Stoats that the WKT considered it viable to attempt to control stoats using this toxin. The WKT has invested funds to enable many of its volunteer trappers to obtain a Controlled Substances Licences to use PAPP in its stoat control operations and has used PredaStop for stoats in operations in 2015 and 2017.

The WKT would welcome the availability of PredaStop for Cats so as to provide alternative options for cat control but would only consider using this toxin if the notification requirements are significantly reduced. Since 2001, 341 feral cats have been killed as part of the Whakatāne-Ōhope Kiwi project. Cats are either captured in our predator trap network comprising 567 traps over approximately 2400ha or via live trapping in targeted areas. WKT volunteers spend 9-10 hours a week alone running 19 live cat traps in these targeted areas where there have been specific issues with feral cats. 16 feral cats have been captured this way in the last 20 months. This is time consuming dedicated work as live traps need to be checked daily. Having a toxin option with manageable notification requirements and particularly if able to be delivered in a long life bait, would enable us to consider landscape scale cat control in the future .

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:

To approve the reduction in the notification requirements for PredaStop for feral cats from 3km to 500m
