

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY



NGĀ KAIWHAKATŪPATO WHAKARARU TAIAO

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY

COMMUNICATIONS GUIDELINE FOR AERIAL 1080 OPERATIONS

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CHIEF EXECUTIVE'S FOREWORD

Communication, the open sharing of information and ideas, is key to enhancing understanding and building trust. It is always important; particularly in situations where some activity is planned that may affect others directly or indirectly.

The use of 1080 around areas where people work, live and play requires good communication to ensure that people's concerns are heard and taken into account. This best practice guideline has been developed to help people managing aerial 1080 operations.

People managing 1080 operations must meet the minimum standards for communication set out in the controls in the Environmental Risk Management Authority's 2007 Decision on the reassessment of 1080, and the conditions on permissions.

They are also expected to consult with people likely to be directly affected by an operation, and engage others in the community, to an extent that is reasonable, about the direct and indirect effects that the operation may have on the community.

ERMA New Zealand expects to see consultation and communication with neighbours, affected groups and communities about aerial 1080 operations to an extent that is appropriate for each operation. We believe this could reduce public concern and result in a reduction in incidents caused by poor communication. It is one of the aspects of aerial 1080 operations that we are monitoring.



Rob Forlong

Chief Executive, ERMA New Zealand

March 2009

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1 BACKGROUND

The purpose of this document is to provide guidance on best practice for communication activities required to implement an aerial 1080 operation. It has been developed in accordance with the Environmental Risk Management Authority's 2007 Decision on the Application for the Reassessment of Sodium Fluoroacetate (1080).

1.1 Target Audience for this Guideline

This guide is for use by organisations and individuals involved in planning and implementing pest control operations using 1080 applied aerially on public and private lands.

The requirements for consultation are based on the potential of the operation to affect people and communities. Due to greater public access to public land, operations planned to take place on public land will usually require wider communication.

This guide is also intended to inform community and interest groups of the communication methods that the Authority considers to be best practice for organisations managing aerial 1080 operations.

1.2 Strategic and Programme Level Consultation

Consultation should be undertaken at different levels. The first, or *strategic*, level is when the need for a pest control programme is being established. The second level is when a pest control *programme* is being established, and the third is at the *operational* level – where the particulars of an operation are being planned.

The strategic level of a 1080 operation may not necessarily include determining the method of control to be used. However, it is advisable to consult relevant interest groups about preferred methods of control and preferred methods for particular areas before tendering pest control operations. Communication and consultation processes should be built into any pest control tender process when an aerial 1080 operation is being considered.

1.2.1 Strategic and Programme Level Consultation with Māori

Given the significant and unique relationship between iwi/Māori and publically administered lands, a consistently high standard of iwi/Māori involvement is important. Concerns have been raised by iwi/Māori about their ability, as Treaty of Waitangi (Tiriti ō Waitangi) partners, to participate at a more strategic level in pest and conservation management initiatives generally and in decisions on management strategies.

Central and local government agencies need to consider the importance of early engagement of iwi/Māori in the strategic policy and planning development for pest control and conservation management. Where proposed pest control programmes include public lands, the early engagement of iwi/Māori in the planning and development should be a priority.

1.2.2 Programme Level Consultation with Hunting Groups

Given the significant effect that pest control operations can have on the timing or availability of hunting opportunities on public lands, a consistently high standard of consultation with hunting groups at programme and operational stages is important, and these groups should be consulted early in the planning stages.

Programme managers should also consult with hunting groups about ways of reducing the effects of pest control operations on hunting opportunities in significant hunting areas. When agreement has been reached on mitigation methods, this should be incorporated into operational plans.

1.3 What this Guideline does not Include

This guideline does not include:

- Specific recommendations for strategic level consultation.
- Specific requirements for communication that may be required for resource consents (under the Resource Management Act (1991)) and permissions.

2 DECIDING WHAT COMMUNICATION IS APPROPRIATE

The goal of communication on aerial 1080 operations should be to share information and enhance understanding, rather than simply to comply with a statutory process. Effective communication will involve a mix of consultation, notification and relationship maintenance.

2.1 Process for Communication

The operations manager needs to establish the communication processes that are appropriate for the proposed operation. The sequence of communication required will depend on the potential effects of the operation. The three steps that may form the communication process are:

Step 1: Consultation on the options for control and their effects. This is generally done at the first, or strategic, stage of planning, but may also be appropriate at other stages of some operations. Consultation will include options for control in the operational area, and should take place with:

- individual people over specified parts of the operational area;
- groups and organisations with a special interest in the area; and
- entire communities, where aerial application has not occurred previously in that area or where relationships with the community have not been established.

Step 2: Consultation on the effects of the operation. Once a decision to apply 1080 using aerial methods has been made, the purpose of consultation is to hear people's views and consider how any specific concerns could be alleviated by changing certain aspects of the operation.

It may be possible to start consultation at this step in the process when initial consultation has already been carried out and there is a history of aerial 1080 application for the operational area.

Consultation may start at this step when an operation is carried out on private land only and access by the public can be limited during caution periods. In these circumstances (at a minimum) neighbours and people downstream of water catchments will still need to be consulted on effects. Consultation required by permission and consent conditions will also need to be carried out.

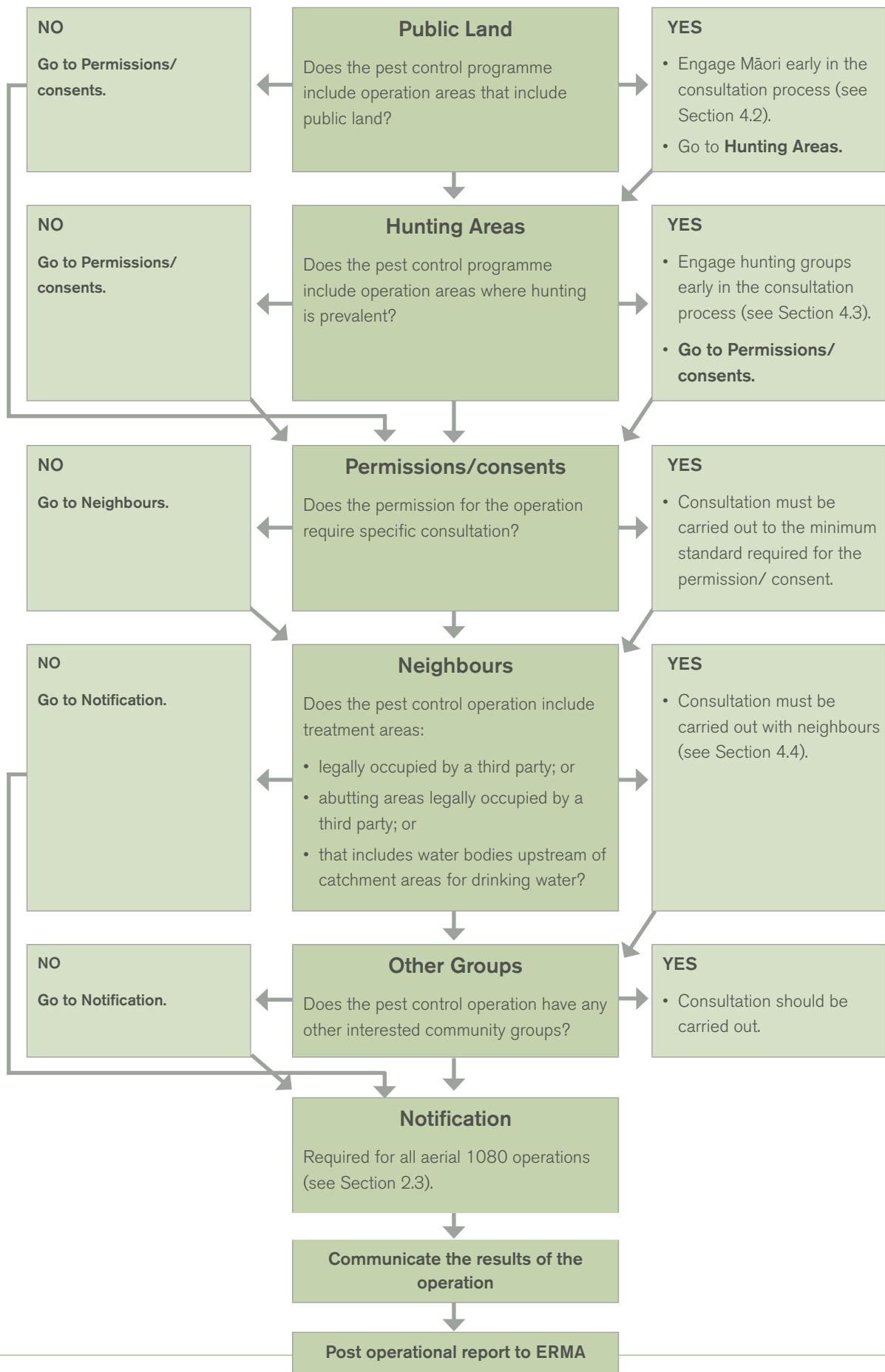
Step 3: Notification. This takes place after a decision has been made to aerially apply 1080 and consultation is completed. The purpose of notification is to inform affected parties of times, dates, locations and other required operational matters.

Notification on its own (i.e. without the previous communication processes) is appropriate only when an operation is:

- a) taking place on private land, not accessible to the public, well away from neighbours' boundaries and any waterway; and is also
- b) on properties where aerial application of 1080 is an established practice and the neighbours are comfortable with this method of pest control.

Notification on its own is not sufficient communication if an operation is taking place on public land. On public land, Māori, neighbours and hunting groups should be consulted either at a programme level or, at a minimum, at an operational level.

DECISION TREE FOR COMMUNICATION ACTIVITIES



2.2 Consultation

Consultation is the process of extending a genuine invitation to interested and affected parties to express their views, and provides a means of addressing their concerns. It is a process of genuine consideration of what people have to say. To achieve effective consultation, sufficient information must first be made available to the people and organisations concerned, and adequate time allowed for them to consider it before responding to consultation.

Consultation does not necessarily mean conforming to every aspect of the other party's view. It does, however, enable informed decision-making by having regard to those views and it may result in changes to aspects of the operation.

2.2.1 Consultation Processes

There are many best practice consultation processes available. The following provides a guide to get operations managers started:

- **Identify** the appropriate people and interest groups to contact. If using databases from previous operations, ensure that information is up to date. Include people who expressed concern or provided feedback regarding previous operations. If in doubt over who to consult, ask the organisations listed in Section 4.
- **Make contact** with the appropriate people and interest groups well in advance of your intended operation, preferably as early as possible in the development of your programme. For each phase of the consultation, let the person or group contacted know the purpose of the consultation and allow a period of time (2-6 weeks) for those contacted to consider information and to respond.
- **Inform** people of your intended proposal in a short letter using simple language. Ask them to respond (within a specified time period) as to whether they have any issues they would like to discuss face to face. The letter should include a short outline of the intended operation and attach any relevant additional information, such as fact sheets, as well as a pre-printed reply form. An outline of the issues likely to be of concern is included in the tables in Section 4.

If those contacted have no issues requiring consultation, ask that they indicate this to you in writing on the reply form. If they would like to meet with you to discuss the operation, ask that they inform you of a suitable time and place, and of any costs involved. Follow up by phone where necessary.

- **Be clear** about which aspects of the operation are open to consultation and which are not. If certain aspects are legitimately non-negotiable, clearly state the reasons why. Entertaining feedback about aspects of an operation that are unalterable can alienate people and make them wary of future consultations.
- If you host a **meeting**, provide copies of your intended agenda and operational information and be prepared to make a brief verbal presentation. Avoid scientific jargon and information overload, and listen carefully to what is said in discussion and questions. Ensure your approach to the discussion seeks to develop solutions that address any concerns, and enhance any benefits.
- Keep a written **record** of the meeting and request written responses from those consulted where appropriate.

2.2.2 Dealing with the Results of Consultation

When people raise significant concerns, you should make all reasonable efforts to address those concerns. The people involved may be able to suggest workable modifications to aspects of the operational plan, such as timing, method, or exclusion areas (e.g. waahi tapu, mahinga kai, grazing areas, water intakes).

2.2.3 Maintain Relationships Beyond the Operation

Avoid seeing consultation as a “one off”; instead see it as an opportunity to develop long-term and constructive relationships. When people have been consulted, it is good practice to continue to provide them with information about the outcomes of the operation. At times it may be possible to invite interested parties to view the operation, so they can see the results of the consultation.

If future operations in the region are likely, it is important that you maintain the relationships you have established. At the very least, this will assist in future consultation. Establishing long-term relationships is likely to add value to the success of future operations through knowledge gained from people's input, and increased public acceptance of, and confidence in, your operations.

2.3 Standards for Notification

There are minimum requirements for who is to be notified and how. These can be found in the Decision, on the product label, and in the conditions of registration under the Agricultural Compounds and Veterinary Medicines Act 1997 (ACVM). A summary of these requirements is given in this section.

2.3.1 Public Notices

Any person applying 1080 from an aircraft (or engaging someone else to do so) is required to give public notice in a newspaper that is available in the areas where the 1080 will be applied. The minimum standard for this notification is:

- there shall be sufficient prior notification (no more than two months); and
- the notice is required to specify:
 - the approximate date of application;
 - the name and nature of the substance;
 - appropriate warnings in regard to potential harm (e.g. dogs should be kept out of the area, taking of food, etc.);
 - a description of the target area¹, including:
 - the boundaries of the area;
 - districts, roads and other commonly known features that might identify the place;
 - the location(s) and times where members of the public may view maps of the application area; and
 - the name and address of the person responsible for the application of the substance².

The requirement for public notification applies to the application of substances containing 1080 (not pre-feed). The application must not take place before the date stated in the public notification and, where the 1080 application is delayed (or likely to be delayed) past the two-month notice period, public notices need to be repeated before application.

1 Where a map is being used in a public notice as an alternative to the description of the target area, it needs to be of a large enough scale and clear enough to convey this information.

2 Where appropriate, this may be the title of the operations manager, their organisation and their physical work address.

2.3.2 Land Occupiers and Neighbours

Any person applying 1080 (or engaging someone else to do so) is required to notify all owners, occupiers and grazing licence holders of land included in and abutting the proposed treatment area.

Operations managers need to ensure that they have identified all of the current owners and occupiers of land included in and abutting the proposed treatment area. In addition to any consultation that may have occurred, the minimum standard for notification of land occupiers and neighbours is:

- there shall be sufficient prior notification (but no more than two months); and
- if requested by the owner/occupier, notification needs to be repeated at a mutually agreed time.

The notice is required to specify:

- the approximate date of application;
- the name and nature of the substance;
- appropriate warnings in regard to potential harm (e.g. dogs should be kept out of the area, taking of food, etc); and
- a description of the target area, including
 - the boundaries of the area;
 - districts, roads and other commonly known features that might identify the place; and
 - the name and address of the person responsible for the application of the substance³.

The requirement for notification of neighbours applies to the application of substances containing 1080 (not pre-feed). The application must not take place before the date stated in the public notification and, where the 1080 application is delayed (or likely to be delayed) past the two-month notice period, public notices need to be repeated before application.

A written record of notification should be kept.

Appendix 2 contains an example record sheet for notification of individuals.

2.3.3 Signage

The minimum standards for notification by signage are:

- Signs are required to be erected at every normal point of entry to the place where the substance is to be applied before the substance is applied or laid.
- Signs are required to:
 - identify the person who is applying 1080³, and provide sufficient information to enable the person to be contacted during normal business hours;
 - identify the substance and state that it is toxic to human beings and ecotoxic to other vertebrates and state that it might be present in carcasses;
 - state the date on which the substance is to be applied;
 - state that it is an offence for any person to remove the signs before clearance of the area;
 - state that it is an offence for any person (other than the applicator) to remove baits from the area; and
 - warn of potential harm to dogs.

3

Usually the title of the person in the principal contracting company

Sign information must be able to be read from a distance of:

- 10 metres (marking areas where 1080 is used; statement warning the public about the dangers to dogs from carcasses);
- two metres (identification of person laying the 1080 and contact details; date of application of 1080).

Signs are required to remain in place for a minimum of six months after the last day of application, or until:

- the 1080 (and any carcass) is no longer toxic; or
- the 1080 (and any carcass) has been retrieved from the place concerned.

When the operation is completed, signs are required to be removed.

2.3.4 Sign Register

A sign register should be established at the start of the operation and maintained until signs are removed.

The sign register should also include information about the location, type and size of sign, the date each sign was installed and the date that each sign was removed.

3

COMMUNICATIONS PLANNING FOR 1080 OPERATIONS

This guideline assumes that strategic-level consultation will have addressed the need for pest control and will have informed the requirements for the proposed operation (including methods to be used).

The communications described in this guideline should address the concerns people have about how the proposed operation may affect them and how modifications to the operational plan may help mitigate or address these concerns.

3.1 Creating a Communications Plan

To create a communications plan, the operations manager⁴ should have identified sensitive areas and likely groups/individuals who need to be engaged at an operational level. Operations managers need to plan communications around the operation effectively, ensuring that:

- consultation and notification are planned for all appropriate target audiences;
- methods are appropriate to target audiences;
- consultation types and standards are appropriate for the target audiences;
- timeframes are realistic; and
- a communications record is created for inclusion in post-operational reports and for other requirements (permissions, resource consents).

3.1.1 Standards for Plans

The communications plan must specifically identify:

- the objectives of consultation and notification;
- the background to the operation (why it is being done);
- the issues (people and communication related) and key messages;
- a list of communication "tools" or resources that will be used;
- who needs to be contacted, including those legally required or stipulated in controls or permissions;
- the purpose of consulting or notifying each target audience;
- who is responsible for each communication, and target dates for completion; and
- what method(s) will be used to notify or consult each target audience.

Additionally, for each of the identified target audiences, the operations manager should specify:

- who is being communicated with;
- when they will be consulted or notified (including timeframes for people to respond);
- what is being consulted on; and
- how the communication will occur.

Appendix 1 contains an example template for a communications plan.

⁴

The person managing the planning and/or operational phase of an aerial 1080 operation

3.1.2 Plan Maintenance

The communications plan must be completed before consultation begins, but should be treated as a living document, regularly updated as consultation and notification takes place. A record of the consultation and notification should be produced, including:

- actual dates when consultation and notification was undertaken;
- references to resources used (e.g. key facts packs); and
- outcomes of consultation and notification.

3.2 Communication Methods

The communications plan should identify the appropriate methods for communicating with the target audiences. This section discusses some of the methods that may be used.

3.2.1 Operation Fact Packs

“Operation fact packs” are a pre-prepared collection of information about the operation. Fact packs will usually contain a covering letter, an operation-specific fact sheet that is relevant to the communication activity (i.e. consultation or notification) and leaflets/brochures specific to 1080 and pest control. Fact sheets provide the backbone for communication with interested parties and organisations.

A key facts sheet is a summary sheet that gives general information in a concise format about the operation. Depending on the communications plan, there may be one fact sheet developed for the whole operation, or one for each stage of the communications.

Appendix 3 contains an example of a consultation key facts sheet and Appendix 5 contains an example of a notification key facts sheet.

Generally fact sheets will contain a summary of the following information:

- contacts for the organisation carrying out the operation;
- target pest and location of the proposed operation;
- a map of the location;
- timeframes;
- reason for the operation; and
- where to get more information.

Fact sheets designed specifically for the *consultation* phase of communication activities may also contain information on:

- the purpose of the consultation;
- what has been decided so far and what is being consulted on; and
- how to have your say.

Fact sheets designed specifically for the *notification* phase of communication activities may also contain information on:

- why the method of pest control has been chosen;
- risks associated with 1080 and procedure to mitigate risk; and
- actions to take if poisoning is suspected.

3.2.2 Face-to-face Meetings

Face-to-face meetings between the operation representatives and affected individuals such as neighbours, held at a mutually agreed location, give people the opportunity to discuss their concerns on their own turf and express their individual concerns in the absence of peer pressure (as can occur in group meetings). They also ensure that people have easy access to information pertaining to an operation (e.g. farm maps). Operation representatives should ensure that they keep records of what was discussed during these visits.

Appendix 4 contains an example visit plan and template for keeping records of visits.

3.2.3 Public Notices

Public notices are required for notification of aerial operations (see section 2.3.1), but may be used early in consultation as a way to alert and make contact with affected parties as well as provide the general public with information about operations.

For operations on public land close to population centres, operations managers may consider the early use of newspaper supplements to notify the public about the operation. These give the operations manager the ability to present information about the reasons for the operation to a wide audience. If this method is employed, it is important to ensure that the content of the material is specific to the operation.

3.2.4 Public Meetings or Hui

Meetings and hui give operations representatives the chance to have face-to-face contact with larger numbers of people. They give a personal touch to operations and provide a forum for discussion and expression of different views in a community. The types of meetings held will depend on the stakeholder requirements identified. For specific groups, such as iwi or neighbours, it may be more appropriate to hold invitation-only meetings, but hold open public meetings when consulting the community.

When hosting a meeting, operations managers should ensure that they have a prepared agenda, provide copies of their agenda and intended operational information (e.g. fact sheets), and be prepared to make a brief verbal presentation. Avoid scientific jargon and information overload and listen carefully to what is said. Operations managers need to ensure that their approach to the discussion seeks to develop solutions that address any concerns, and enhance any benefits.

Operations managers should consider using a respected member of the local community as a meeting facilitator. This gives communities a sense that they will be listened to, and makes staff more available to respond to questions. It is also important to consult in venues where the audience is comfortable (e.g. the local Marae for iwi groups).

3.2.5 Working Groups

The establishment of working groups can be a useful way of having more detailed discussion and debate about complex issues around the operation. This gives groups with specific concerns about an operation the opportunity to have more significant input than they would have in a public meeting. Members of working groups may be selected by the operation managers, or may be nominated by the community.

4 METHODS OF COMMUNICATION

This section provides advice on methods that programme and operations managers should consider when consulting and notifying stakeholder and interest groups.

4.1 Communication Records

Written records should be kept of all communications.

Records of notification and consultation will provide details of information and agreements that help planning the implementation stage of operations. They are good support material for applications and compliance reports. Written records of communication activities must be included in post-operational reports forwarded to ERMA New Zealand.

Records should include enough information to be able to assess what actions need to be taken to minimise any adverse effects of the application on each stakeholder.

Appendix 4 contains a template that can be used for recording consultation with individuals and people, and Schedule A (of Appendix 1) contains a template that can be used for collating consultation information.

4.2 Communication with Māori Groups

Māori groups should be engaged as early as possible in the planning process where an aerial 1080 operation may be carried out on any public lands, or in areas where the public may be affected by the application. Māori should also be engaged in discussions around an operation where strategic planning recognises that the ongoing management by Māori of their cultural and natural resources may be affected by the operation. The aim should be to establish a good relationship with relevant hapū and iwi.

The courts and the Waitangi Tribunal have variously outlined the requirements of genuine consultation with Māori, and these have been well tested over the years through a number of legislative avenues. In the *Air New Zealand Ltd v Wellington International Airport Ltd* case, Justice McGechan used the following definition:

“Consulting involves the statement of a proposal not yet finally decided upon, listening to what others have to say, considering their responses and then deciding what will be done.”

Consultation is a two-way process, and when considering consulting with Māori you should incorporate the following key elements of good consultation:

- provide sufficient time for iwi/Māori to respond i.e. consulting at the earliest possible stage in the development of the planning for the operation;
- provide sufficient information to ensure those consulted have a good level of understanding of the proposed operation and are able to respond; and
- give genuine consideration to the information provided by those being consulted.

The overall aim of good consultation is summarised in the following objectives:

- provide easily understood information about your proposed application;
- obtain information and understanding of Māori perspectives and views of your application; and
- when issues are raised, discuss ways of minimising, mitigating, or remedying any potential adverse effects and enhancing any potential beneficial effects of the operation.

In addition, the broad principles established by the courts in relation to consultation should be kept in mind. These are **“acting reasonably”**, in **“good faith”**, and **“actively protecting Māori interests”**.

4.2.1 Who Should Operation Managers Engage in the Communications around a 1080 Operation?

If you do not already have established relationships with the hapū and iwi in the region of your intended operation, contact details and information can be obtained from a number of sources such as:

- the local Department of Conservation office;
- the local Regional Council; or
- the local Te Puni Kōkiri office.

Remember that your operational area may cross one or more hapū or iwi boundaries. Good consultation would include all relevant parties.

4.2.2 What to Consult On

Table 1 (next page) provides a guide to the effects Māori are likely to consider during your consultation. The table should be considered a starting point rather than an exhaustive list.

Remember that the nature of the concern may not always be tangible in nature (e.g. biological, physical, health related or economic), but may be intangible (i.e. wholly cultural or spiritual in nature). Be prepared to be open-minded and inclusive in the development of potential solutions.

TABLE 1: CONSIDERATION OF EFFECTS ON MĀORI

Environmental Outcomes		
<i>Is the operation likely to impact on the productivity and life-sustaining quantity and quality of:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Traditional Māori food resources (mahinga kai)		
• New Zealand's indigenous flora and fauna		
• Other flora and fauna valued by Māori		
• Water (inland and coastal)		
• Land		
• Air		
• Natural habitats and ecosystems		
• Other natural resources valued by Māori		
Cultural Outcomes		
<i>Is the operation likely to impact on the protection and enhancement of:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• People – <i>Te tangata</i>		
• Native flora and fauna – <i>Ngā taonga koiora</i>		
• Valued flora and fauna – <i>Ngā taonga tuku iho</i>		
• Land – <i>Te whenua</i>		
• Waterways (inland and coastal) – <i>Ngā moana, roto, awa, manga</i>		
• Air – <i>Te hau</i>		
• Traditional Māori values and practices – <i>Ngā taonga tuku iho</i>		
• Māori knowledge system and world view – <i>Mātauranga Māori</i>		
Health & Well-being Outcomes		
<i>Is the operation likely to impact on the protection and enhancement of:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Taha wairua (spirituality, health and well-being)		
• Taha whanaunga (family/wider group health and well-being)		
• Taha hinengaro (mental health and well-being)		
• Taha tinana (physical health and well-being)		
Economic Development Outcomes		
<i>Is the operation likely to impact on the:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Ongoing capacity and capability of Māori to develop economically		
• Ongoing participation of Māori in the generation of economic benefit, and the burden of economic cost		

TABLE 1: CONSIDERATION OF EFFECTS ON MĀORI		
Tiriti ō Waitangi / Treaty of Waitangi Outcomes		
<i>Is the operation likely to impact on the:</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Ongoing management by Māori of their cultural and natural resources		
• Ongoing rights of Māori to develop culturally, socially, spiritually and physically		
• Implementation of the principles of the Treaty of Waitangi		
• Land		

4.3 Communication with Recreational and Commercial Hunting Groups

Hunting groups should be engaged as early as possible in the planning process where an aerial 1080 operation is likely to be carried out on any public lands where hunting is prevalent and is likely to be affected by an application. Early engagement of hunting groups is especially important in areas that are Recreational Hunting Areas (RHAs) and where commercial harvesting of animals for meat is prevalent.

4.3.1 Who Should Operations Managers Engage in the Communications around a 1080 Operation?

If operations managers do not have established relationships with hunting groups in the region of their intended operation, contact details and information can be obtained from a number of sources such as:

- the New Zealand Deerstalkers Association (website www.deerstalkers.org.nz). Local Deerstalkers Association branches contacts are available from the association;
- local pig hunting clubs;
- the local Department of Conservation office;
- the New Zealand Food Safety Authority (certified wild food suppliers on website <http://www.nzfsa.govt.nz/animalproducts/registers-lists>); and
- Fish and Game New Zealand.

Remember that your operational area may cross one or more hunting group branch boundaries. Also remember to contact both recreational hunting groups and commercial hunters.

4.3.2 What to Consult on

Table 2 provides a guide to the issues likely to be of interest to hunting groups. It is not an exhaustive list, but rather some starting points for consultation.

TABLE 2: STAKEHOLDER ISSUES FOR HUNTING GROUPS		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do specific parts of the proposed operational area contain species of particular interest to recreational hunters?		
Are specific parts of the proposed operational area of particular interest to commercial hunters?		
Are there specific parts of the area where ground control should be considered?		
Are there specific parts of the area where deer repellent should be considered?		
Will the timing of the operation affect specific hunting opportunities (e.g. timing in relation to the roar or hunting competitions)?		
What practices are there to reduce the risk of secondary poisoning of hunting dogs?		

4.3.3 Notifying Hunting Groups

Hunting groups need sufficient notice of an operation to be able to disseminate information to their members about the risks of harvesting animals for food after an application, and of risks to their dogs.

Early notification of treatment areas may also give hunters the opportunity to harvest animals from hunting areas before treatment and implementation of caution periods.

Hunting groups should also be notified about when the caution period has ended so they may resume hunting and bring dogs back into the operational area.

4.4 Communication with Neighbours and Others

Neighbours and other affected people should be engaged as early as practicable in the planning and communication process, even if some operational details such as the coverage area are yet to be finalised. If it is possible that operational boundaries may change, err on the side of caution and include all *potential* affected parties.

4.4.1 Who Should Operations Managers Engage in the Communications around a 1080 Operation?

If operations managers do not already have established relationships with the occupiers of land within and next to the proposed operational area, contact details and information can be obtained from a number of sources such as:

- contacts logs from previous operations;
- the local district council (rating database);
- Department of Conservation (in areas next to conservation land);
- Cadastral maps;
- beekeeper associations;
- by visiting identified properties on the boundaries and asking each neighbour if there are other people that may be affected.

Remember that the landowner may not be the occupier, and the occupier may be more directly affected than the landowner.

4.4.2 What to Consult on

Table 3 provides a guide to the issues likely to be of interest to neighbours during your consultation and is a starting point for consultation, rather than an exhaustive list.

TABLE 3: STAKEHOLDER ISSUES FOR NEIGHBOURS		
	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do specific parts of the proposed operational area cause concern for water intakes?		
Are specific parts of the proposed operational area adjoining paddocks with insecure fences?		
Are there specific parts of the area where ground control should be considered?		
Will the timing of the operation affect specific parts of the farming cycle (e.g. lambing)?		
What practices are there to reduce the risk of secondary poisoning of dogs?		
Are there specific parts of the treatment area that are used by the land occupier (e.g. grazing, beekeeping)?		

4.4.3 Notification of Neighbours

Neighbours need sufficient notification to be able to modify their farming (or other) practices if necessary (e.g. shift stock or beehives), make alternative arrangements for water supply and to take measures to mitigate risks to their dogs.

The requirements for notification of neighbours are:

Notification of aerial or ground-based operations

- (1) *No person may apply, or engage another person to apply, a formulated substance containing 1080 by aerial application or ground-based application unless the person has given notice of the proposed application to occupiers and, as far as practicable, owners of land, dwellings or buildings immediately abutting the application area.*
- (2) *The notice referred to in sub clause (1) must—*
 - (a) *be given with sufficient prior notification, but no more than two 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) *a description of the area over which the substance will be applied, including –*
 - (A) *the boundaries of the area; and*
 - (B) *districts, roads, and other commonly known features that may identify the place:*
 - (iv) *the name and address of the person responsible for the application of the substance.*
- (3) *This control shall come into force on 1 January 2008.*

Neighbours are also required to be contacted immediately if 1080 is accidentally applied to their land. They should be notified when it is safe to shift stock back into neighbouring paddocks, use water intakes and when the caution period has ended for dogs.

4.5 Communication with Community and Interest Groups

Community and interest groups should be engaged as early as practicable in the planning and communication process, even if some operational details such as the coverage area are yet to be finalised. If it is possible that operational boundaries may change, err on the side of caution and include all *potential* affected parties.

4.5.1 Who Should Operations Managers Engage in the Communications around a 1080 Operation?

If operations managers do not already have established contacts in areas close to the proposed operational area, they should contact community groups to ensure that the proposed operational plan will not affect community outcomes. The following list of organisations may be able to help you contact community groups:

- Fish and Game NZ (Fish and Game website: <http://www.fishandgame.org.nz>);
- Tramping and mountain bike clubs (Federation of Mountain Clubs website: <http://www.fmc.org.nz>);
- Horse and Pony clubs (Pony Clubs website: <http://www.nzpca.org>);
- Vet clinics (Veterinary Association website: www.vets.org.nz);
- Forest and Bird (Forest and Bird website: <http://www.forestandbird.org.nz>);
- Dog clubs (New Zealand Kennel Club website: <http://www.nzkc.org.nz>);
- RNZSPCA (website: <http://rnzspca.org.nz>); and
- Concessionaires (e.g. tourist operators with concessions to use public lands).

When you visit identified properties on the boundaries, ask each neighbour if there are other groups or people who may be affected. If the operation is on public land, ask the local Department of Conservation or Land Information New Zealand (LINZ) office about groups that commonly use the area.

4.5.2 What to Consult On

Community groups may have both general issues of interest and issues specific to the nature of the group. Operations managers should pay attention to the timing of significant community events in the area (e.g. mountain bike competitions, multisport events).

4.5.3 Public Notification

Operators are required to give public notice in a newspaper available in the areas where the 1080 will be applied. The minimum standard for this notification is:

- there shall be sufficient prior notification (no more than two months);
- the notice is required to specify:
 - the approximate date of application;
 - the name and nature of the substance;
 - a description of the target area, including –
 - the boundaries of the area; and
 - districts, roads and other commonly known features that might identify the place;
 - the location(s) and times where members of the public may view maps of the application area; and
 - the name and address of the person responsible for the application of the substance.

4.6 Police

If not the owner or occupier of the application area, the operator is required to notify the officer in charge of the Police station nearest to the application area of the proposed application⁵. The Police should be given a copy of the key facts pack (or equivalent) and any other information they would like.

4.7 Local Government

Territorial Local Authorities (TLAs) and Regional Councils have responsibilities under the HSNO Act and the Resource Management Act for the prevention or mitigation of any adverse effects of the storage, use, disposal, or transportation of hazardous substances. TLAs also manage municipal drinking water supplies.

District and regional plans will contain specific regulatory requirements for storage, use and disposal of hazardous substances. The discharge of 1080 onto land or water may be subject to such regulatory requirements. Operation managers should consult with the relevant local authorities early in the planning process to ensure that the proposed operational plan will comply with any local regulations. Where a treatment area includes (or is adjacent to) municipal water supply catchments, TLAs must be consulted on effects on drinking water supplies. The Public Health Unit will also impose conditions on an operation with any permission issued to protect drinking water supplies.

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See Additional Control 6 in the Environmental Risk Management Authority's 2007 1080 Reassessment Decision.

APPENDIX 1: COMMUNICATIONS PLAN TEMPLATE

1080 Communications Plan

DD/ Month/Year:

Name of operation:

Sponsor of operation:

Lead organisation:

Prepared by:

Version:

Plan maintained by:

Last edit: DD/ Month/Year

Version History:

Version	Date	Author	Comment

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1. Communications Statement *(Example text)*

The use of vertebrate toxic agents (VTA) is an increasing concern in some parts of the community. The objective of this plan is to manage all the issues relating to application of 1080 poison for pest control by running robust processes for:

- consultation
- notification
- managing issues and complaints
- reporting.

→ *This plan should be read in conjunction with, and be informed by, the related operational plan.*

2. Background/Situation Analysis

→ *You should be able to write a media release from the information in this section.*

3. Communications Protocols and Project Responsibilities

→ *Document here any agreed communications protocols and list organisation/people, roles and responsibilities.*

→ *Questions that need to be considered:*

- Who are the lead agency and the spokesperson/people?
 - Who covers what?
 - Who do we need to tell first?
-

4. Communications Objectives

→ *What do you want to achieve?*

→ *What is the purpose of the consultation/notification?*

a: Consultation *(Example text)*

- Getting input into suggested control options
- Identifying who will be affected and in what way
- Getting support for the operation
- Developing an understanding of the operation
- Running a robust consultation process.

b: Notification *(Example text)*

- Ensuring target audiences know about the planned operation
- Ensuring the most affected parties know when the operation is about to start
- Keeping target audiences informed about the result and ongoing risks of the operation
- Telling people when they can return to using an area.

5. Potential Issues to Consider:

→ *What are the factors that the public may be interested in?*

Example text

- Previous history of the area, including previous treatments of any sort
- People issues/opportunities/specific audiences
- Other conservation projects in the same area
- Whether treatment area is under a Treaty claim
- Existing land care community group present.

6. Key Messages

→ *What are the (up to five) points we most want to get across?*

7. Target Audiences

→ *Groups and individuals who are most likely to be interested, such as:*

- Local Māori
- Local community – residents and businesses
- Neighbours and residents closest to the area to be treated
- Recreational users of the area
- Central and local government – such as regional council, DOC, Fish and Game, Land Information New Zealand (LINZ), Landcorp, local information centre, local tourism operators and guides, local Public Health Unit, Medical Officer of Health, and other Government agencies
- Local media – radio, daily newspapers, free community newspapers.

8. Consultation-specific Issues and Purpose

→ *For each audience consider:*

- What do people already know?
- What are their interests, issues?
- What are our key points?
- Are there any barriers to action?
- How can these be addressed?

9. Tools/Tactics/Channels

→ *What tactics and tools will help you communicate effectively?*

May include:

- Website material for own site and those of related agencies
- Facts packs
- Frequently asked questions and other educational material (*consider distribution points for this – local shops, information centres, and DOC and regional council offices*)
- Face-to-face briefings/ public information meetings.

10. Consultation Plan and Timeline

- *Identify the How, Who and When of consultation in this section.*
- *Consider how to consult and communicate as widely as possible, using diverse methods, channels and networks.*
- *Develop a timeline showing major events and meetings.*

Individual responsible	Task	By (date)
	Prepare press release	
	Prepare website material	
	Check regulatory requirements	
	Brief related agencies, contractors, and affected parties	
	Develop fact sheets and deliver to local distributors (DOC, RC, info centre)	
	Public meeting at local hall	
	Material for 0800 number staff	
	Etc – to be completed as relevant	

11. Notification-specific Issues and Purpose

- *For each audience consider:*
 - Do messages need to include different information for different audiences?
 - What do people already know?
 - What are their interests, issues?
 - What are our key points?
 - Are there any barriers to action?
 - How can these issues be addressed?

12. Notification Plan and Timeline

- *Identify the How, Who and When of notification in this section.*
- *Consider how to get maximum coverage of the notification.*
- *Develop a timeline for consultation showing major events and meetings. This should be a step-by-step outline of what will be done, by whom, and when, such as:*

Individual responsible	Task	By (date)
	Prepare press release	
	Prepare website material	
	Notify consents agencies	
	Brief related agencies, contractors and affected parties	
	Warning signs developed and ordered	
	Warning signs placed	
	24 hour notice delivered to neighbours	
	Etc – to be completed as relevant	

13. Handling Complaints

- *Identify how complaints will be handled – by whom, in what timeframe, how they will be recorded, monitored, responded to, and reported.*

14. Recording the Communication Process

- *Document how a communications record will be established and maintained.*
- *Templates provided for recording consultation, notification and complaints handling may be used for this purpose.*

15. Close-out and Reporting

- *Evaluation for internal reporting*
- *Consider how to measure the results so you know whether you have succeeded and can do it better next time?*
 - Media coverage and analysis
 - Internal feedback
 - Personal contacts
 - Feedback from affected parties
 - ERMA New Zealand reporting – document who will be responsible for doing this, how, and by when.

SCHEDULE A: TEMPLATE FOR RECORDING CONSULTATION AND NOTIFICATION

Consultation

Group	Name	Contact Details	Issues	Purpose of Consultation	How	Who's Responsible	Target Dates	Actual Dates	Outcomes	Reference
Target audience segment	Name of the individual or organisation	Details of contact person and organisation	Issues specific to this group		How you will consult each audience	Person responsible	Use format that allows sorting	Date that work is undertaken	Record any agreements, matters to be followed up, unresolved issues	File reference number
Recreational users	Mountain Bikers Inc.	Jane Doe 44 Cove Way Doeville 09 999 8888 jane@mb.co.nz	Concern about 1080 in waterways	Discuss details of planned operation. Give information about waterways	Special meeting of club arranged	John Smith	2009.02.14	2009.02.14	Include in all further communications. Send copy post-operation water monitoring report	XW01

Notification

Group	Name	Contact Details	Purpose of Notification	How	Who's Responsible	Target Dates	Actual Dates	Outcomes	Reference
Target audience segment	Name of the individual or organisation	Details of contact person and organisation	Select which purpose(s) applies to each target audience	How you will notify each audience	Person responsible	Use format that allows sorting	Date that work is undertaken	Record any agreements, matters to be followed up, unresolved issues	File reference number
Recreational users	Mountain Bikers Inc.	Jane Doe 44 Cove Way Doeville 09 999 8888 jane@mb.co.nz	Continuing information about operation, as agreed in consultation	Email copies of media releases, copies of Notification advertisement	John Smith	2009 Per communication plan	2009.03.01 update sent 2009.04.02 copy Public Notice sent 2009.10.04 water report sent	Ongoing communication established with club	XW01

APPENDIX 2: INDIVIDUAL NOTIFICATION RECORD SHEET

Name of person who conducted notification	
Organisation	
Date and time of notice:	
Name of person notified	
Method of notification <i>(Circle method(s) used)</i>	1. Site visit 2. Letter 3. Phone call 4. Fax 5. Other <i>(Please describe)</i>
Contact details of person notified	Address: Phone: Cell: Fax:
Reason for notifying this person <i>(describe)</i>	
Notification type <i>(Circle reason)</i>	1. Notice of operational plans 2. Change of operational plans 3. Requested repeat notification 4. Incident notification
Did the person acknowledge the notification?	1. Yes <input type="checkbox"/> 2. No <input type="checkbox"/>
Did the person raise any operational issues?	1. Yes <input type="checkbox"/> 2. No <input type="checkbox"/>
Comments	

APPENDIX 3: CONSULTATION KEY FACTS SHEET

1080 control of [pest] in the [name of treatment area]	
Operation summary	<i>Name agency responsible, target pest and where the operation will take place. Refer to the attached map (see below).</i>
Consultation	<i>State the purpose of consultation.</i>
What is being consulted on?	<i>If consulting on effects only, confirm the pest control option (name of the pesticide, bait type and method of applying the bait). Briefly justify the choice. If consulting on pest control options, state any parameters that are fixed.</i>
Timeframes	<i>The date of the intended operation. Statement that dates will be confirmed closer to the operation, and that you will contact all neighbours (if applicable) and place warning signs immediately prior to the operation starting.</i>
Having your say	<i>Describe opportunities for consultation.</i>
Why we are undertaking the operation?	<i>Intended conservation outcomes of the operation (for example, to protect mistletoe from browsing by possums).</i>
Key facts	<i>Identify risks associated with the VTA and the operation and what to do to avoid or mitigate these risks. Statement that presence of warning signs indicates that pesticide residues may still be present in baits or animals. The removal of signs will tell you that you can resume normal activities in the area. If in doubt, check with operations manager.</i>
For more information	<i>Name and phone number of the person to contact for further information. Tip: It may be useful to name the same contact person (position) in your Key Facts Pack as given on the warning sign. If so, the phone number must be a business phone number where someone can be contacted in normal business hours.</i>
MAP	<i>Insert or attach a detailed map of the proposed treatment area.</i>

APPENDIX 4: VISIT PLAN AND RECORDS

1080 Control Operation

Date of meeting:			
Name:			
Address:			
Phone numbers:	Residence	Work	Cell
Email:			
Fax:			
Registered owner:			
Farm manager:			
Legal description:			
Area (ha):		Valuation Number:	
Actions:			

Notes:

POINTS TO COVER

- Discuss all points from key facts pack.
- Discuss restraints regarding taking meat from buffer zones.

BOUNDARIES/ ADJOINING NEIGHBOURS

- Are the boundaries of your property marked correctly on the aerial photo? If not, alter accordingly.
- Are your neighbours, adjoining the park, shown correctly on the aerial photo?
- Have we missed any adjoining neighbours? Would you please provide their name/s, addresses and telephone numbers?

STOCK MOVEMENT

Would it be possible to move stock back from the boundary during the operation?

YES NO NOT APPLICABLE

FENCING

- Boundary fence in good condition, no work required.
- Boundary fence in need of repair – work required: identify boundary on aerial photo where work is required.

APPLICATION OF AERIAL 1080 BAITS NEAR YOUR BOUNDARY

- Pasture/bush boundary – discuss
- Bush/bush boundary – discuss

WATER INTAKE IN OR WITHIN 100 METRES OF THE OPERATIONAL BOUNDARY?

YES *If yes, identify the site/s on aerial photo*

NO

DOES ANYONE ELSE TAKE WATER FROM YOUR WATER INTAKE(S)?

YES *If yes, please provide names and contact details:*

NO

ACCESS ACROSS PRIVATE LAND

I/we grant the <name of the organisation> or their contractors access across my land for the purpose of conducting ground based activities in conjunction with the possum control operation.

LANDOWNER	FOR THE AGENCY
Name:	Name:
Signed:	Signed:
Date: / /	Date: / /

APPENDIX 5: NOTIFICATION KEY FACTS SHEET

Key facts about [name of pest] control in [name of treatment area]	
By	Name agency responsible, target pest and where the operation will take place. Refer to map.
How is it happening?	Name of the VTA, bait type and method of applying the bait. Description of bait type (same as on warning sign).
Timeframe	The date of intended VTA application. Statement that you will contact all neighbours (if applicable) and place warning signs immediately prior to the operation starting.
Important information	<p>Identification of risks associated with the VTA and the operation and what to do to avoid or mitigate these risks. Include a statement about not eating animals from within the buffer zone.</p> <p>Statement that presence of warning signs indicates that residues may still be present in baits or animals. The removal of signs will tell you that you can resume normal activities in the area. If in doubt, check with the xxxxxx.</p>
Why we are controlling the [pest]	Intended outcomes of the operation (for example, to protect mistletoe from browsing by possums, to reduce TB infections in cattle).
Why we are using this method	The reason(s) for the use of the method(s).
Operational planning	Consents required and the consultation process.
If you suspect poisoning	Details on treatment in case of poisoning or National Poisons Centre phone number 0800 764 766 (urgent calls) or a designated phone number (non-urgent and general enquiries) or dial 111.
For more information	<p>Name and phone number of the person to contact for further information.</p> <p>Tip: It may be useful to name the same contacts in your key facts pack as you name on the Warning Sign. If so, the phone number must be either a business or cell phone number where someone can be contacted in normal business hours.</p>
Operational area	<p>Name of treatment area.</p> <p>Insert or attach a map of the treatment area.</p>

APPENDIX 6: PROCESS FOR HANDLING COMPLAINTS

Record any complaint/issue that is received by the operation team. An issues/complaints register should be established by the manager responsible for the operation.

The person responsible for maintaining the register should acknowledge the complainant in writing and include an outline of the process that will be undertaken to investigate the complaint and resolve any issues.

The manager responsible should designate an individual in the lead organisation to make an assessment of the complaint and provide a brief report and make an assessment as to whether an incident report needs to be given for a misapplication, loss or spill⁶. If the complaint includes comment about the lead organisation, a third party should be engaged to undertake the assessment.

When considering the report, the manager responsible for the operation will determine whether the complaint should:

- be noted; or
- whether actions should be undertaken as a result of the report to address/repair issues raised by the complainant.

Within 10 working days of receipt of the complaint, a letter updating progress or reporting on the outcomes of the investigation should be provided to the complainant.

Once the process is complete and any actions identified, the complainant and the register should be updated. At this stage, if the complainant continues to have concerns about the operation and requires some remedial action they should be advised to submit a written complaint to ERMA New Zealand.

Operators are required to include information about complaints about aerial operations in their post-operational reports to ERMA New Zealand.

Example of a Complaints register:

Date received	Name of complainant and contact details	Details of the complaint / issue	Person responsible for assessment	Date of report	Outcomes of the report	Date of notification to complainant
		Record the complaint as submitted by the complainant	Delegated by the person in charge of the organisation			

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See Additional Control 8 in the Decision

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY



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