

## Policy statement on the use of toxins to control pests in New Zealand

### The Game Animal Council:

1. Advocates for the general policy of reducing the use of toxins in our environment.
2. Acknowledges the need to use toxins to control some pest species for both conservation and biosecurity control reasons until other control methods are developed and implemented.
3. Maintains that there is no justification to use toxins for the control of game animals in New Zealand and opposes such use. (Note: There may be extreme circumstances requiring total de-population where poisoning could be justified on a case by case basis.)
4. Strongly advocates for a national policy on the use of toxins, which has regard to, consultation, science, mitigation, animal welfare, residue safety, marketing and tourism perceptions, consistency of application, alternative options and adoption of best practice.
5. Supports the allocation of sufficient resources for finding alternatives to the use of toxins in the environment.
6. Maintains that, prior to the application of toxins, a consultation process should be completed that:
  - Meets accepted principles and standards for consultation;
  - Is transparent, and all available information is provided;
  - Allows affected parties to identify potential mitigation measures;
  - Is consistent nationally throughout all agencies.
7. Maintains that each application of toxins should:
  - Be based on sound science;
  - Be designed for the target species, and minimise the by-kill of game animals and other non-target species;
  - Ensure humane standards in the killing of target species;
  - Ensure that there is no possibility of residues entering the food production system or entering recreationally harvested game meat;
  - Minimise adverse effects on the environment;
  - Adequately assess mitigation measures, and use mitigation where appropriate.

## Background

### 1. The New Zealand Game Animal Council

The Game Animal Council, established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, *inter alia*, representing game animal hunters, and advising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

### 2. Game animals in New Zealand

- New Zealand's game animals are an important recreational, social and economic resource.
- All large game in this country (deer, tahr, chamois and pigs) are susceptible to toxins. In addition, dogs, used in both farming and recreation, are fatally susceptible to the toxin 1080 at dose rates sub-lethal for ungulates, including secondary poisoning.
- Wild game species typically are found in the same localities as pest species targeted for control by poisoning. In addition, deer farms and game estates often share boundaries with public land administered by the State. Toxin applications on public lands can have significant adverse effects on wild and managed game species.
- All game species in New Zealand are harvested for food and, while deer farming accounts for the vast majority of game meat exports, wild game is a significant food source for export and domestic consumption.
- The combination of recreational hunting and aerial recovery expertise developed over the past 40 years provides a significant component of the management of New Zealand's game populations at no cost to the government. Game animals are generally at low densities and can be managed effectively by recreational and/or commercial hunting, or in targeted species-specific control operations. There is currently no justification for the use of toxins as a control measure for game animal species.

### 3. Game species as an economic resource

- The deer industry had total export earnings of \$255 million for the 2015 year. NZ Venison returns have risen, assisted considerably by the perception internationally of venison as a safe food item. The game estate and guided hunting industries have earnings of approximately \$15 million annually and have considerable potential for expansion. Internationally, New Zealand is considered to be the world's premier destination for hunted red deer stags and Himalayan tahr and is increasingly recognised for the quality of its other game species. It is considered a safe, stable, unpolluted country, and attracts a discerning, influential hunting clientele. Additionally, many of these clients have considerable further non-hunting related expenditure as part of their trip to NZ.
- Expenditure by New Zealanders on recreational game hunting is in the order of \$170 million annually. Less easy to quantify, but probably of greater significance, is the role hunting plays in maintaining mental and physical health, and the recreation benefits enjoyed by thousands.
- The use of toxins has the potential to jeopardise each of these industries.

### 4. The use of toxins in pest control

- The Game Animal Council supports the need to control specific pest species because of their health and environmental effects. The Council recognises threats to New Zealand's natural ecology and the risk that an unacceptable incidence of Tb presents to New Zealand's

agricultural trade. The validity of using toxins to manage pest populations is acknowledged, until alternative methods are available.

- However, there appears to be no unequivocal policy from pest control agencies to avoid killing game animals with toxins while targeting pests. There are many recorded instances of collateral deaths to both wild and farmed game animals from possum poisoning operations. This level of by-kill in game species is highly variable (between 10% and 90%).
- While the documented recovery of native birds following successful pest control is acknowledged, the impacts of game species ingesting pesticides either accidentally or deliberately are substantial.
- There are tools available to minimise the by-kill of non-target species, and of particular significance is a repellent that reduces the likelihood of game animals ingesting 1080 baits. The Game Animal Council advocates strongly that all agencies use such tools to minimise the unnecessary by-kill of game animals.

## 5. Discussion

- **Consultation.** Whilst the Game Animal Council supports pest control for conservation and biosecurity, each operation may have varying effects on hunters and others with an interest in a particular place. It is important that affected parties have an opportunity through due process to identify these effects and be involved in assessing and recommending appropriate mitigation measures. Such consultation must be open and transparent, with all information (including, *inter alia*, toxin type, toxin strength, application rates/ha, bait types and sizes, pre-baiting techniques, application methods, mitigation methods) made available as part of the consultation.
- **Science.** The Council promotes science-based decision making. It is important that agencies using toxins have good science to support the need to use a particular toxin, the effects that toxin will have, and the effectiveness of mitigation measures. The absence of good science, or failure to communicate that science adequately, has the potential to undermine community acceptance of proposed toxin applications.
- **Residues.** Whilst not directly presenting a threat to the farmed venison trade, given the application systems and residue monitoring programmes in place, any activity which may result in game meat being associated with a potential residue risk has the ability to cause considerable difficulties in the marketplace. Discerning consumers worldwide are particularly cautious following food safety scares in Europe. Hunted game for private consumption is not subjected to the same levels of monitoring as processed meat and the possibility of contamination poses a real risk.
- The absence of a consistent national policy on the use of toxins has resulted in:
  - Different agendas between agencies;
  - Variable consultation protocols and standards;
  - Public confusion and concern;
  - Inconsistency of application;
  - Pressure to halt the use of toxins before alternatives have been found.

## 6. Recommendation.

The Game Animal Council urges all agencies with statutory responsibility for biosecurity, conservation and pest control (DOC, Ministry for the Environment, MPI, OSPRI, Regional Councils) to establish a common policy and operating protocols to ensure consistent application and defensible standards.