10 June 2020

9(2)(a)

RE Official information request WCDHB 9426

We refer to your email dated 25 April 2020 which the Ministry of Health subsequently partially transferred to West Coast DHB on 12 May 2020 requesting the following information under the Official Information Act. Specifically questions 1 and 2:

 Please provide a copy of the permission granted by Greymouth MOH for the 2014 Kaiata Range aerial 1080 operation conducted by Tb-Free NZ. The File Reference number is 4/767/GRYPH/CB.

A copy of this permission is attached as **Appendix 1**.

1. Please provide a copy of the audit of this operation.

A copy of the field audit notes and photographs taken by the field auditors are attached as Appendix 2.

Please note we have redacted information pursuant to section 9(2)(a) of the Official Information Act "... to protect the privacy of individuals".

You may, under section 28(3) of the Official Information Act, seek a review of our decision to withhold information by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz; or Freephone 0800 802 602.

I trust that this satisfies your interest in this matter.

Please note that this response, or an edited version of this response, may be published on the West Coast DHB website after your receipt of this response.

Yours sincerely

Carolyn Gullery **Executive Director**

Planning, Funding & Decision Support





PERMISSION FOR USE OF VERTEBRATE TOXIC AGENT(S)

Approved VTA Permission Form Version 3: March 2010

Pursuant to section 95A of the Hazardous Substances and New Organisms Act 1996

To 9(2)(a)

Of Vector Control Services

PO Box 453

Greymouth 7840

Application Identification Code 14/767/GRYPH/CB

Operation Name Kaiata

Application Location 9330 ha South-East of Greymouth covering Kaiata Range.

Territorial Local Authority(s) Grey District Council

Purpose of Operation Possum Control

I, Cheryl Brunton being a person acting under powers delegated by the Environmental Risk Management Authority (the Authority), GRANT PERMISSION for the USE of the vertebrate toxic agent listed in SCHEDULE 1, in the area indicated on the map in SCHEDULE 3, subject to the CONDITIONS set out in SCHEDULE 1 and SCHEDULE 2 attached hereto and the HSNO approvals for that vertebrate toxic agent;

Between: Start date: 23 May 2014 End date: 30 December 2014

Signed:

Name: Cheryl Brunton

Date Issued: 22 May 2014

Contact Person:

Steffan Cavill-Fowler Phone: (03) 768 1160 Fax: 03 768 1169

Email: steffan.cavill-fowler@cdhb.health.nz

Community & Public Health

4 Tarapuhi Street PO Box 443 Greymouth 7805

Title: Medical Officer of Health Greymon

Appeals: Section 125 (1A) of the Hazardous Substances and New Organisms (HSNO) Act: A person may appeal to the District Court against a decision of the Authority, under section 95A about the terms and conditions of a permission held by the person. **Notice of Appeal:** Section 127 of the HSNO Act: Before or immediately after the filing and service of a notice of appeal, the appellant shall serve a copy of the notice on the Authority, and every other party to the proceedings, and any other person who made a submission to the Authority.

PERMISSION CONDITIONS: SCHEDULE 1 (Vertebrate Toxic Agents)

Application Identification Code: 14/767/GRYPH/CB

Application Location: 9330ha South-East of Greymouth covering Kaiata Range.

Sodium Fluoroacetate	Strength	Form	Application ra
	1.5 g/kg	Cereal Pellets	2 kg/Ha
HSNO Approval Number: HSR002 4	421		80
Start Date: 1 May 2014	End Date:30 De	cember 2014	and '
Methods of application for this VTA	allowed under this permis	ssion: Aerial	<i>(</i> 0,
	CHIE OFFICIA	AL MEORE	

PERMISSION CONDITIONS: SCHEDULE 2

Application Identification Code:14/767/GRYPH/CB

Application Location: 9330 ha South-East of Greymouth covering Kaiata Range.

The requirements specified under the Hazardous Substances and New Organisms 1996 (HSNO) Act, its regulations, and Approvals for Vertebrate Toxic Agents granted under the HSNO Act are minimum requirements, which must be met.

A person acting under a delegation from the Authority may impose additional (stricter) conditions to address local circumstances. In addition to requirements specified under the HSNO Act, the following conditions shall apply:

Notifications

CONDITION 1: Start Date

The applicant shall advise the Health Protection Officer at Community & Public Health (West Coast) of the commencement of the application of the VTA(s), at least 24 hours before commencing application.

CONDITION 2: Changes to Permission

The applicant shall advise the Health Protection Officer at Community & Public Health of any material changes to the applicant's proposed operation (such as changes in operational areas and application types/ rates).

CONDITION 3: Warning Sign Removal

The applicant shall advise the Health Protection Officer at Community & Public Health in writing of their intention to remove warning signs from the operational area.

CONDITION 4: Complaints and Incidents

Any incidents or complaints relating to the operation that are likely to impact on public health shall be reported to the Health Protection Officer at Community & Public Health within 24 hours of the incident or complaint.

CONDITION 5: Duration of Permission

This approval is granted for the period commencing **23 May 2014** to **30 December 2014** inclusive. The Health Protection Officer at Community & Public Health (West Coast) shall be notified if there is any alteration to the intended date of the application.

If the applicant wishes to continue the operation after this date, they should contact Community & Public Health (West Coast) at least two weeks before the expiry date of the original approval period.

Within the duration of this permission toxins may not be applied in publically accessible areas during school holidays or public holidays or within 24 hours of the start of such holidays.

No operation may be extended beyond 12 months from the original start date.

CONDITION 6: Landowner Notification

Before commencing the operation, the applicant shall notify occupiers and, as far as practicable, owners of land, dwellings or buildings immediately abutting the operational area.

The notice must be given sufficiently prior to, but within two months of, the proposed application of the VTA(s). If requested by the person notified, notification shall be repeated at a mutually agreed time before the proposed application.

The notice shall specify:

- i. the approximate date on which the VTA (s) will be applied.
- ii. the name and nature of the VTA (s).
- iii. a description of the area over which the VTA (s) will be applied.
- the name and address of the person responsible for applying the VTA (s).
- v. information on safety and precautions with respect to the VTA(s) being used.

CONDITION 7: School Notification

Before commencing the operation, the applicant shall notify schools, kōhanga reo, kindergartens and early childhood centres that are known to use the operational area. The notice must be given sufficiently prior to, but within two months of, the proposed application of the VTA(s).

If requested by the institution notified, notification shall be repeated at a mutually agreed time before the proposed application. The notice shall specify:

- i. the approximate date on which the VTA (s) will be applied.
- ii. the name and nature of the VTA (s).
- iii. a description of the area over which the VTA (s) will be applied.
- iv. the name and address of the person responsible for applying the VTA (s).
- v. information on safety and precautions with respect to the VTA(s) being used.

CONDITION 8: Health Services Notification

The applicant shall notify the nearest/ local health services of the proposed application of the VTA(s). Nearest/ local health services include GPs (including the Rural Academic Practice situated at the Greymouth Hospital) and other primary health services, ambulance services and hospitals.

The notice must be given sufficiently prior to, but within two months of, the proposed application of the VTA(s). The notice shall specify:

- i. the approximate date on which the VTA (s) will be applied.
- ii. the name and nature of the VTA (s).
- iii. a description of the area over which the VTA (s) will be applied.
- iv. the name and address of the person responsible for applying the VTA (s).
- v. information on safety and precautions with respect to the VTA(s) being used.

CONDITION 9: Public Notification

The applicant shall give public notice in the following media (e.g. newspapers, community newsletters) of the proposed application of the VTA (s):

- Greymouth Star
- · West Coast Messenger

The notice must be given sufficiently prior to, but within (seven days) of, the proposed application of the VTA(s). The notice shall specify:

- i. the approximate date the VTA(s) will be applied.
- ii. the name and nature of the VTA(s).
- iii. a description of the area over which the VTA(s) will be applied.
- iv. the location(s) where the public may view maps of the area over which the VTA(s) will be applied and the times when such maps can be viewed.
- v. the name and address of the person responsible for applying the VTA(s).

The applicant must provide a copy of the public notice, and the date(s) and media in which it was published to Community & Public Health before commencing the operation.

Accidental direct exposure to VTAs

CONDITION 10: Exclusion from Public Areas

No Vertebrate Toxic Agent (VTA) shall be aerially applied within the distances listed below, and not where it is within sight of, the following access points and public areas:

• Brunner Mine Historic Reserve (100 metres)

Warning signs shall be placed at each of the access points and public amenity area(s) prior to the laying of before the Vertebrate Toxic Agent VTA(s) are laid in adjoining areas.

CONDITION 11: Exclusion from Walking and Vehicle Tracks

No VTA shall be aerially applied within 80 metres of all walking and vehicle tracks (or within a different distance for the tracks listed below), and where possible all baits and bait stations shall be out of sight of walking and vehicle tracks (except those listed in Condition 16):

• Marsden Road (Aorangi Scenic Reserve) (100 metres)

CONDITION 12: Exclusion from Roads

No VTA shall be aerially applied within 80 metres of the following roads and where possible all baits and bait stations shall be out of sight of roads and lay-bys:

- State Highway 7
- Arnold Valley Road
- Maori Gully Road (outside the private forestry area)
- Stillwater Road

CONDITION 13: Exclusion from Dwellings

No VTA shall be applied within 150 metres of (or within a different distance if mutually agreed in writing with the occupiers), and not be visible from, dwellings or built-up areas.

CONDITION 14: Exclusion from Schools and Early Childhood Centres

No VTA shall be applied within 200 metres of (or a greater distance if mutually agreed in writing with the occupiers), and not where it is visible from, any school(s), kindergartens, kōhanga reo and early childhood centres.

CONDITION 15: Aerial Exclusions

An aircraft that is carrying out an aerial application must not, when flying to or from the area where the VTA is applied, fly over the following "no fly" areas:

- Public drinking water supplies
- Within 100 metres upstream of a water intake

CONDITION 16: Aerial Applications to Tracks and First Clearances

The applicant may aerially apply 1080 to the following walking and vehicle tracks but not during or within 24 hours of the start of school holidays, public holidays or public holiday weekends:

- Kakawau Track
- Maori Gully Road (inside the private forestry area)
- Unnamed forestry roads off Maori Gully Road (inside the private forestry area)

If the applicant aerially applies 1080 to any of the above tracks, they shall inspect those tracks as soon as possible and not more than 24 hours after the VTA application and make reasonal efforts to find and remove all bait and, if encountered, animal carcasses.

CONDITION 17: Second Clearances

The applicant shall undertake a second inspection of the following walking and vehicle tracks and make reasonable efforts to find and remove all bait and, if encountered, animal carcasses:

- Kakawau Track
- Maori Gully Road (inside the private forestry area)
- Unnamed forestry roads off Maori Gully Road (inside the private forestry area)

The second inspection shall be made within 7 days of the VTA application. It should be limited to take place either: -

- i. immediately after the occurance of strong winds; or
- ii. immediately before the weekend or commencement of school holidays or public holidays;
 whichever occurs first.

CONDITION 18: GPS Track Logs

A GPS log shall be recorded and maintained for each track clearance and made available to the Health Protection Officer at Community & Public Health (West Coast) on request.

CONDITION 19: Sign Contents

All warning signs must include an international symbol for toxic substances (e.g. skull and crossbones) and a statement advising that children and pets should not be allowed to wander (e.g. 'WATCH CHILDREN at all times').

CONDITION 20: Sign Maintenance

During the period in which the baits remain toxic, warning signs at the locations listed below shall be inspected immediately before the commencement of school holidays, public holidays or public holiday weekends:

- State Highway 7
- Arnold Valley Road
- Maori Gully Road
- Stillwater Road
- Marsden Road (Aorangi Scenic Reserve)

Any signs that are damaged, vandalised or otherwise become illegible shall be replaced within 24 hours of discovery of the damage.

CONDITION 21: Sign Vandalism

During the period in which the baits remain toxic, warning signs shall be inspected weekly in the locations listed in Condition 20.

Any signs that are damaged, vandalised or otherwise become illegible shall be replaced within 24 hours of discovery.

Contamination of water supplies

CONDITION 22: Domestic Water Supply: Notification

The applicant shall notify the intended operation to all people who:

- · source their domestic water supply from within the operational area; or
- source their domestic water supply within 200 metres of the operational area where the water source is a surface waterway that flows through or rises within the operational area.

The notice must be given sufficiently prior to, but within two months of, the proposed application of the VTA(s).

If requested by the person notified, notification shall be repeated at a mutually-agreed time before the proposed application.

CONDITION 23: Domestic Water Supply:Location

The applicant shall verify the location of water supplies with all people who:

- source their domestic water supply for within the operational area; or
- source their domestic water supply within 200 metres of the operational are, where the water source is a surface waterway that flows through or rises within the operational area.

A GPS waypoint file of water supply intakes shall be recorded and made available to Health Protection Officer at Community & Public Health on request.

CONDITION 24: Domestic Water Supply: Exclusions

No VTA shall be ground-laid within 20 metres of domestic water supply intakes that source water within the operational area. For flowing surface watercourses, the 20 metres exclusion shall extend for a length of 50 metres upstream from the point of intake.

CONDITION 25: Domestic Water Supply: Mitigation

For an aerial application of 1080, applicants must provide mitigation to all households that: -

- source water from inside the operational area; or
- source domestic water supply within 3km of the operational area where the water source is a surface waterway that flows through or rises within the operational area if mitigation is requested by household occupiers

Mitigation shall involve either or both of the following: -

- i. No 1080 shall be applied within 80 metres of the water supply intakes. For flowing surface waterways, the 80 metre exclusion shall be extended for a length of 200 metres upstream from the point of intake.
- ii. Domestic water supply shall be temporarily disconnected until such time as water testing finds no detectable 1080 levels in the source water. If no temporary water source is available an adequate alternative potable water supply (to be used for drinking and cooking) will be provided to affected households; the amount per day to be agreed with the household, until testing is completed.

CONDITION 26: Water Supply Testing

The water testing shall conform to the requirements attached to this permission.

Where water testing reveals VTA contamination, the alternative potable water supply shall be maintained until such time as a repeat test confirms VTA contamination is undetectable.

CONDITION 27: Public Water Supplies: Notification

The applicant shall notify the details of the intended operation to all managers of public water supplies who:

- source their public water supply from within the operational area; or
- source their public water supply within 200 metres of the operational area where the water source is a surface waterway that flows through or rises within the operational area.

The notice must be given sufficiently prior to, but within two months of, the proposed application of the VTA(s).

If requested by the person notified, notification shall be repeated at a mutually-agreed time before the proposed application.

CONDITION 28: Public Water Supplies: Location

The applicant shall mutually verify the location of public water supply intakes with all water supply managers who:

- source their public water supply from within the operational area; or
- source their public water supply within 200 metres of the operational area where the water source is a surface waterway that flows through or rises within the operational area.

A GPS waypoint file of water supply intakes shall be recorded and made available to the Health Protection Officer at Community & Public Health on request.

CONDITION 29: Public Water Supplies: Exclusions

No VTA shall be ground laid within 50 metres of public water supply intakes that source water within the operational area. For flowing surface watercourses, the 50 metre exclusion shall be extended to 100 metres upstream of the point of intake.

CONDITION 30: Public Water Supplies: Mitigation

For an aerial application of 1080, applicants must provide mitigation to all public water supplies that:

- source their public water supply from within the operational area; or
- source their public water supply within 200 metres of the operational area where the water source is a surface waterway that flows through or rises within the operational area.

Mitigation shall be mutually agreed in writing between the applicant and water supply managers and involve either or both of the following:

- No 1080 shall be applied within 200 metres of the water supply intakes. For flowing surface watercourses, the 200 metres exclusion shall be extended to 400 metres upstream of the point of intake.
- ii. If an interim water supply is available, the affected water supply shall be temporarily disconnected until such time as water testing finds that 1080 is undetectable in the source water.

CONDITION 31: Water Supply Mitigation: Reporting

The applicant shall maintain a list of water mitigation measures provided under Conditions 25 and 30, which shall be available, on request, to the Health Protection Officer at Community & Public Health.

CONDITION 32: Water Supply Testing: Reporting

The applicant shall provide, or arrange for the provision of, the outcome of all water testing to Health Protection Officer at Community & Public Health within 24 hours of receipt of the testing results.

In the event that water testing reveals any detectable levels of VTA contamination, the applicant shall discuss any further proposed mitigation measures with Health Protection Officer at Community & Public Health and continue testing in accordance with the requirement for monitoring to establish compliance with the Drinking-Water Standards of New Zealand.

Additional Conditions

Condition 33: Operators Log

An operator's log *(report)* must be compiled of activities associated with the aerial application and a copy of this log is to be forwarded to the Health Protection Officer at Community & Public Health (West Coast) within four weeks of the date of the vertebrate toxic agent being laid.

The log shall include:

- i. Time, date and place of the application
- ii. Amount of vertebrate toxic agent applied and its formulation
- iii. List of supervising operators
- iv. Names of subcontractors with services provided
- v. Name, address and rating number of pilot(s)
- vi. Any incidents that occurred and problems that arose during the operation, including the investigation undertaken and where necessary the remedial actions taken
- vii. Any involuntary transgressions of the conditions in this approval, including an explanation of each transgression and the remedial actions taken
- viii. Copy of GPS printouts of toxic flight lines
- ix. A completed copy of the aerial operation form.

Condition 34: Trickle Bucket

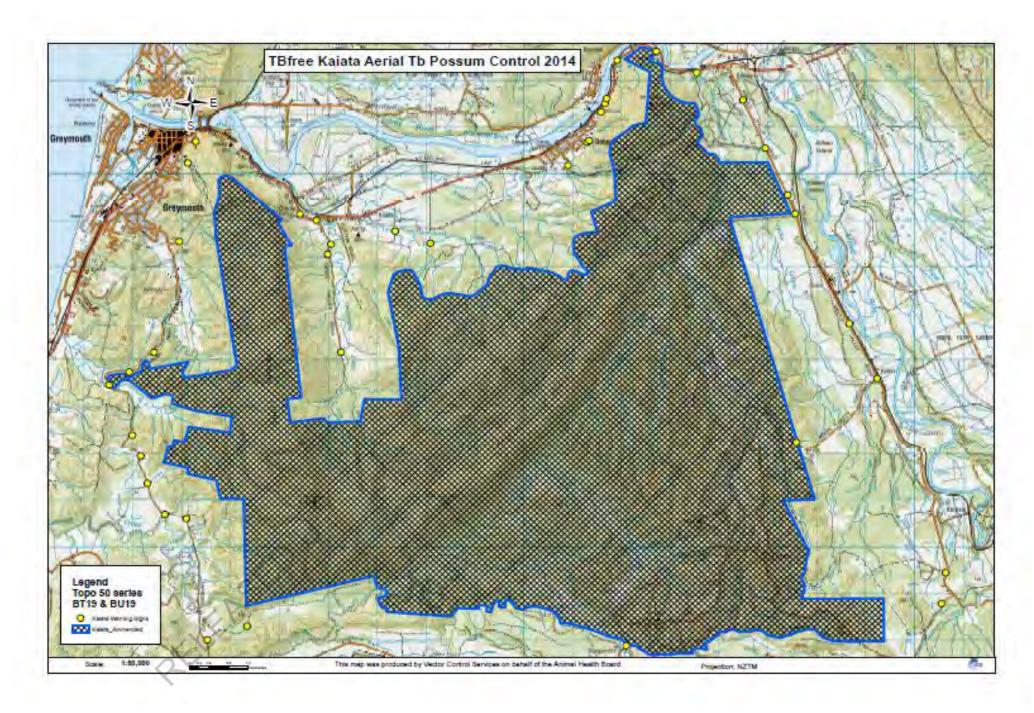
If a trickle bucket is used the applicant must supply a map of the area that 1080 is to be aerially applied to before the operation and a GPS track record print out from the helicopter after the operation.

Approved Form V3: March 2010 Page 9 of 11 M M R

PERMISSION CONDITIONS: SCHEDULE 3 (Maps)

Application Identification Code: 14/767/GRYPH/CB

Application Location: 9330 ha South-East of Greymouth covering Kaiata Range.



Field Audit Notes Kaiata Aerial 13/06/2014

Audito	ors: ^{9(2)(a)}
1045 1050	Enter Marsden Scenic reserve Limestone track 1 st sign date on sign 12/6/14
	Creek Rd full map and sign
1053	Photo 2 nd sign Kakawau Peak Track sign With map
1105	3 rd sign no map sign on gate @paper road (4WD) Marsden Rd – gate locked
1112 1115 1120 1122	(photo) 4 th sign opposite layby – Marsden Rd on gate. (a) took photo 3 Sign 5 on gate by women duathlon turnaround sign. (no map) Marsden Rd. Sign 6 on fence adj layby Marsden Rd (no map) sign only (a) photo Sign 7 (a) photo layby Marsden Rd bush close to road 2x cyclists
1126 1135 1140 1140	Sign 8 Mill Creek Electro man – keen hunter Aorangi Scenic Reserve- photo Sign 9 full signage + map photo loop track nature walk bush to road photo Sign 10 on bushes sighted no photo Sign 11 for reserve – no sign Marsden
1145	No signs Boddytown Sign 12 Powerboard Rd Omotumotu Scenic Reserve Coates Rd sign no map. Gate up Rd closed private road but tracks now approaching Greymouth.
1205 1220	Sign 13 Puketa St map + sign up road by Power Entrance. Sign 14 King Pack track /walk way sighted Chapter St. off Alexander
	Lunch
1300 1307 1309	Restart Nth Greymouth Sign 15 Omoto on gate Highway 7 -photo Sign 16 Omoto Valley Rd.15m in from Highway by powerlines access photo right hand side
1311 1313	Sign 17 photo Omoto Valley Rd left hand side into valley Sign 18 on a tree right hand side up really high Omoto Valley Rd. Access both ways off road to life style blocks.
1319	Sign 19 on gate to private property fence + hear helicopter
1337 1346	Sign 20 Kaiata Industrial Park Sign 21 Kaiata sign up rise on road photo from truck road goes on further
1340	we doubled back to this sign
1400	Sign 22 back at Dobson 4WD track into pine
1405	Sign 23 Rugby club SE end at treeline
1415	Sign 24 Rugby Club NE end at tree line (far end) AJ photo of 23 Sign 25 up at Reservoir Rd @ Dobson sign up no map
1413	advised auditors of post on facebook of 1080
1.50	Maori Gully showed someone with 1080 a photo Sign with helicopter working pilot didn't see them. Photo has 3 baits close together. Forestry road, not happy they are in there without permit. – looking around further up road looking for a property for sale.
1432	Sign 26 sighted
1435	Signs 27/28 both sighted

- 1437 Arnold Valley Road
- 1438 Sign 29 Arnold Valley Rd on gate sighted 2x
- 1439 Sign 30 bush on A valley Rd
- 1440 Sign 31 track into bush gate A V Rd
- 1441 Sign 32 layby AV Rd. Approaching freezing works
- 1441 Sign 33 on gate bf4 freezing works
- 1444 Sign 34 Maori Gully Rd photo - triple sign
- 1445 Sign 35sStd signs
- 1447 Sign 36 std signs
- 1450 Sign 37 Operational area sign up (photo) Maori Gully Rd
- RMATIONA 1451 Sign 38 Maori Gully Rd std sign (March operation sign) up on gate Chain on road – photo
 - Sign 39 sighted
 - Sign 40 sighted

2ELEASED V

- Sign 41 along road
- Aratika Rd old sign Lake Brunner Street
- Track Maori Gully Creek Rd sign photo on way back to Greymouth 1515 Sign 42 bus shelter at entrance 1212 on letter box
 - Cones over road entrance near Stafford Street (opp)
- 1535 Sign past Blackball on fence on way back to grey.

Left area (returned to Greymouth, arrived 1615)



















