APP202879 - PredaStop for feral cats

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Overall Notes:

Clause
What is your position on the application
Position
I support the application
Notes

Clause
All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.
Position
No I do not wish to speak about my submission at the hearing
Notes
Greater Wellington Regional Council (GWRC) strongly supports the reduction of the notification area for PredaStop from 3km to 500m.

Under the Resource Management Act 1991, and the Biosecurity Act 1993, the Greater Wellington Regional Council (GWRC) has statutory obligations for the management of pest animals within the 813,000 hectares of the Wellington Region. These obligations include the maintenance of regional indigenous biodiversity and the implementation of the Regional Pest Management Strategy 2002-2022.

GWRC undertakes predator control operations across the Wellington Region for Biodiversity purposes. Mustelids and feral cats are some of the worst predators of our native flightless and ground nesting birds, and the vulnerable lizard and invertebrate populations. Ferrets are a known vector for Bovine Tb, and are actively monitored and controlled by TBfree NZ and their contractors. The current management of these species is restricted by the limited range of control products available on the New Zealand market.

For mustelid control, trapping remains the key control method with only one toxin, Diphacinone Ferret paste, available. The situation is similar for feral cats, with the only toxin available - 0.1% 1080 feral cat bait, being limited to use solely by the Department of Conservation, and PAPP with the limitations of the 3km notification area. It is vital to Greater Wellington, and the pest control industry as a whole, that a wider range of control methods are available to ensure economic and efficient predator control operations.

Reducing the notification area for PredaStop from 3km to 500m would allow GWRC to integrate the use of PredaStop with our existing possum and rodent control programmes and enable better management of these predators in our Key Native Ecosystem sites.

GWRC recognises the importance of taking actions to reduce feral cat numbers and reduce the subsequent risk of toxoplasmosis. Toxoplasmosis in sheep flocks only occurs due to feral cats being in the environment. The protozoal disease toxoplasmosis (Toxoplasma gondii) is widespread throughout New Zealand and cats are the only definitive hosts of the protozoa and may shed millions of infectious oocysts in their faeces into the environment. Since the 1950s, toxoplasmosis has been recognised as a significant cause of abortion in sheep, goats and pigs (Tompkins 2014) and it results in substantial economic and welfare impact.

Having a range of control methods available allows safe and effective control in different land-use area. Varying between trapping and poisoning helps to catch target animals that are adverse to either method. Trapping is costly and inefficient in many situations, and an effective, affordable predator toxin would have wide benefits for the biodiversity of the Wellington region, and New Zealand as a whole. With growing opposition and restrictions on poisons such as aerial 1080, it is important that the pest control industry continues to investigate, develop and trial new toxins. The use of specific toxins with less risk of secondary poisoning, and an effective and affordable antidote, are of increasing importance. In the event of accidental poisoning, PAPP has an antidote, methylene blue, which has been used for over 100 years for the treatment of nitrate poisoning in ruminants. The availability of this antidote makes PAPP a valuable tool in areas of public use, and helps mitigate any potential negative impact on the community.
GWRC also recognises PAPP as a very valuable tool as part of the national goal of a predator free New Zealand and in the management of toxoplasmosis in a rural landscape. Even though PAPP is very effective, it is considerably more humane than other forms of VTA control, and has minimal risk to non-target species, the current 3km notification requirement, which we believe is unwarranted, significantly restricts its use. As a result, feral cat management is not conducted over larger areas than otherwise would be, therefore having negative impacts on both the environment and primary production.