

# Canterbury

District Health Board

Te Poari Hauora o Waitaha

## CORPORATE OFFICE

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24 September 2019

9(2)(a)

### RE Official Information Act request CDHB 10179

I refer to your email dated 16 August 2019 sent to OSPRI which they have subsequently partially transferred to us on 4 September 2019 requesting the following information under the Official Information regarding Department of Conservation managed land in the Clarence and last year's Molesworth 1080 drops. Canterbury DHB will be responding specifically to Question 3 of your original request.

Please note that the Canterbury DHB was not involved in issuing a public health permission for last year's Molesworth 1080 drop as that area is in the Marlborough region. Permission for that operation would have been issued by the Nelson-Marlborough DHB.

Our response below refers to the public health permission for the 2019 aerial 1080 operation called Clarence West which was issued by staff of the Canterbury DHB.

### **3. Copies of each decision paper assessing the effects, alternatives, possible mitigation, whether or not to grant the permit/authority etc. and what if any conditions to impose.**

In considering applications for public health permission to use 1080 we carry out a risk assessment of the use of that toxin in particular locality and circumstances of the proposed operation. The focus of that assessment is human health. The permission document issued to an operator contains conditions which are, in effect the required mitigation (from a public health perspective).

In considering whether or not to grant a public health permission a public health Hazardous Substances and New Organisms (HSNO) officer carries out a risk assessment and satisfies themselves that, provided appropriate conditions are imposed, any risk to public health is minimised as far as possible. If that is the case then there are no grounds to refuse to grant a permission. A copy of the public health risk assessment for the Clarence West operation is attached as **Appendix 1** for your information.

Please note we have redacted HSNO Officers' names under section 9(2)(a) of the Official Information Act i.e. "...to protect the privacy of natural persons, including those deceased".

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](http://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 Canterbury DHB website after your receipt of this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carolyn Gullery', with a long, sweeping underline.

Carolyn Gullery  
**Executive Director**  
**Planning, Funding & Decision Support**

## RISK MANAGEMENT AND RISK COMMUNICATION: APPLICATION FOR A HEALTH PERMISSION FOR THE USE OF VERTEBRATE TOXIC AND OTHER HAZARDOUS SUBSTANCE(S)<sup>1</sup>

Application: Ref # 19/1187/BW/CHRP\_ (eg 17/1013/DW/TIMPH) Application Location: Clarence \_\_\_ (eg, Waimate Forest, 65,987ha)

Conditions modified by Health and Safety at Work (Hazardous Substances) Regulation 2017 which came into force on 1 December 2017  
(See Application of Model Permit Conditions for VTAs and other Hazardous Substances from MoH)

Model Condition	Required for this Application (Tick all that apply)	Any variation to Model Permit Condition (Yes/No)	Variation of Model Permit Condition	Rationale for inclusion/exclusion/modification of Model Permit Condition	Has appropriate consultation with relevant stakeholder undertaken? (Yes/No/NA) <sup>2</sup>
<b>Notifications</b>					
1 Start date	✓	No		01 May 2019	
2 Changes to permission	✓	No			
3 Warning sign removal	Removed				
4 Complaints and incidents	✓	No			
5 Duration of permission	✓	No		01 May 2019 – 30 April 2020	
6 Landowner notification <b>Not required</b> for aerial and ground 1080, and MZP paste <b>except point (v)</b> <b>Required</b> for cyanide, yellow phosphorus, DRC 1339, Aerial Campaign®; Amdro®; Advion®	✓	No		Ground application of Feratox	
7 School notification	✓	No		Kaikoura School – 45 km Ward School – 42 km	Schools contacted, application states that no issues were identified.
8 Health services notification	✓	No			Wairau Hospital Kaikoura Hospital / Medical Center St John Ambulance Kaikoura & Blenheim

<sup>1</sup> Hazardous substances refer to substances listed in Schedule 1 of the Environmental Protection Authority's Instrument of Delegation. These are: sodium fluoroacetate (1080), sodium cyanide, potassium cyanide, yellow phosphorous, 3-chloro-p-toluidine-hydrochloride, microencapsulated zinc phosphate paste, Advion® fire ant bait, Amdro® fire ant bait, Campaign® ant bait.

<sup>2</sup> NA means that the model condition does not apply to the consultation question.

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9 Public notification <sup>3</sup> <b>Not required</b> for aerial and ground 1080, and MZP paste <b>except point (v)</b> <b>Required</b> for cyanide, yellow phosphorus, DRC 1339, Aerial Campaign®; Amdro®; Advion®	✓	No		Includes ground application of feratox	NA
<b>Accidental direct exposure to VTAs</b>					
10 Exclusion from public areas <b>Required for all VTAs</b> <b>BUT remove signage requirement</b> for aerial and ground 1080, cyanide, yellow phosphorus, DRD 1339, MZP paste	✓	N/A		No public areas other than general DOC land however Clarence river is within the operational area. Any landing point along the Clarence River that is within the operational area and that is known to be used by the public – 20 metres for feratox	Conversation with operator 08/04/2019 – 2 private huts. Owners have said they are happy for baits to be sown over these huts. No onsite water supplies.
11 Exclusion from walking and vehicle tracks	✗	N/A		No walking tracks Waiautoa Station private roads and tracks within the treatment area.	Conversation with operator 08/04/2019 – All private vehicle and walking tracks.
12 Exclusion from roads	✗	N/A		No public vehicle access within the operational area.	
13 Exclusion from dwellings	✗	N/A		No dwellings within the operational area.	
14 Exclusion from schools and early childhood centres	✗	N/A		No schools or ECCs	
15 Aerial exclusions	✗	N/A		No sensitive areas	
16 Aerial applications to tracks and first clearances	✗			No public walking tracks or vehicle tracks	
17 Second clearances	✗	NA		N/A	

<sup>3</sup> This is a legal requirement (see Additional Control 11 (under section 77A of the HSNO Act) of the reassessment decision on 1080) and is therefore not repeated in the Model Permit Conditions.

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18 GPS track logs	x	N/A		No track clearances.	
19 Sign contents					
20 Sign maintenance					
21 Sign vandalism					
<b>Contamination of water supplies</b>					
22 Domestic water supply: notification	✓	No	3 kilometres	X2 domestic water supplies identified	Debo house consultation
23 Domestic water supply: location	✓	No	3 kilometres	X2 domestic water supplies identified	Debo house consultation
24 Domestic water supply: exclusions	✓	No		Aerial operation	
25 Domestic water supply: mitigation	✓	No		X2 domestic water supplies identified - The two water takes for the Debo house hold will be excluded but also disconnected until testing shows no contamination.	Debo house consultation
26 Water supply testing	✓	No		Water supply testing will take place for the debo house supplies	
27 Public water supplies: notification	✓	No	3 kilometres		Checked with DWA on public supplies taken from the Clarence – conversation 03/04/2019 no public water supplies within this area.
28 Public water supplies: location	✓	No	3 kilometres	No	
29 Public water supplies: exclusions	✓	No		Ground component	
30 Public water supplies: mitigation	✓	No	3 kilometres		

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31 Water supply mitigation: reporting	✓	No			
32 Water supply testing: reporting	✓	No			
<b>Additional Conditions to Address Operation-specific Risks</b>					
33 Operator Log	✓	Additional condition		Aerial	
34 Trickle Bucket	✓	Additional condition		Aerial	
35 Etc.	✓		Condition 35: Information Board An information board shall be installed at the car park at the confluence of the Acheron River and the Clarence River. The information board shall be visible to the public and must include, a map of the operational area, 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').	Public can raft down the Clarence and access unofficial camping areas.	
<b>Reissue of revoked permission</b>					
Unique identification code of revoked permission					

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Operational difference between the two applications					
Changes to the risk					

Name: 9(2)(a)

Title: HSNO Enforcement Officer

Date: 03/04/3019

Peer reviewer: 9(2)(a)

Date: 9<sup>th</sup> April 2019

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