

Operating Plan 63

Aerial and Hand Broadcast Application of Pestoff[®] Rodent Bait 20R (V9014) for the Intended Eradication of Rodents from Specified Areas of New Zealand



A handwritten signature in blue ink, appearing to read "Maree Zinzley".

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Document History

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2019/1		Review and update
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FOREWORD AND ACKNOWLEDGEMENT

Pestoff® Rodent Bait 20R (V9014) is a Vertebrate Toxic Agent registered under the ACVM Act 1997 to Animal Control Products Ltd of Wanganui, New Zealand.

The product was originally registered in August 1997, to provide a tool for the Department of Conservation (DOC) to eradicate rodents on offshore islands. In this respect, the product has served and continues to serve its purpose well.

The later establishment of predator-fenced “mainland island” sanctuaries for native biota inspired the development of a Code of Practice, as a risk management framework for using Pestoff Rodent Bait 20R for the removal of exotic mammalian pests from land in both private and public ownership. This also allowed the use of the product on offshore islands under private ownership, where rodent eradication was sought.

This revision of the original Code of Practice has been led by qualified practitioners of the Department of Conservation in consultation with stakeholders, landowners and private sector interests in the fields of pest eradication and ecological restoration. Alastair Fairweather and Keith Broome have carried out the revision using the knowledge and experience which they, their colleagues and collaborators have developed over two decades of eradications.

Through this consultation it is hoped that the revised Operating Plan will be a working document which guides the on-going use of Pestoff Rodent Bait 20R, to ensure its future availability for decades to come.

William McCook
Chief Executive
ORILLION (The trading name for Animal Control Products Ltd)
Day month 2017

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1. INTRODUCTION

Pestoff® Rodent Bait 20R has been approved, with controls, under the Hazardous Substances and New Organisms (HSNO) Act (HSR001612) and registered as a Vertebrate Toxic Agent under the Agricultural Compounds and Veterinary Medicines (ACVM) Act (V009014). The aerial application of Pestoff® Rodent bait 20R has proved to be an extremely effective method of eradicating rodents from offshore islands and from behind predator proof fenced areas on the mainland of New Zealand. While eradication of rodents can provide immense benefits to NZ's native flora and fauna, poorly managed use of brodifacoum could have serious consequences for NZ's agricultural sector if residues are detected in livestock, food or animal products.

This Operating Plan imposes, when followed properly, standards which will prevent brodifacoum entering the human food chain during the application of brodifacoum baits to eradicate rodents from specified sites in NZ. Along with the Pestoff Rodent Bait 20R label directions, the standards contained within this document are mandatory, and enforceable through law, once approved by the Ministry for Primary Industries (MPI)

1.1. Purpose and Scope

This Operating Plan has been approved by the ACVM Group, and meets the ACVM Condition of Use 52 and Environmental Protection Authority (EPA) controls as they apply to Pestoff® Rodent bait 20R.

The purpose of this Operating Plan is to ensure that:

- Brodifacoum is contained within the Treatment Area of any Specified Area following the aerial, hand broadcast or bait station application of Pestoff® Rodent Bait 20R.
- Brodifacoum residues will not be present at detectable levels in meat or food products sourced from livestock farmed on land inside the Treatment Area or adjoining any Specified Area as a result of the application of Pestoff® Rodent Bait 20R.

This Operating Plan **applies** to all rodent eradication attempts involving the aerial broadcast, hand broadcast and/or bait station application of Pestoff® Rodent Bait 20R over the following "Specified Areas":

- **Islands** where livestock are normally present;
- **Islands** that do not have livestock present at any time and the operation is not being authorised/undertaken by the Department of Conservation;
- **Peninsulas** which are partially surrounded by a water body which acts as a barrier to pest reinvasion, and where it is connected to a larger body of land, has an effective pest proof fence which minimises reinvasion by target pests from areas outside the Specified Area and excludes all livestock.
- **Sanctuaries** enclosed by an effective pest proof fence which prevents reinvasion by target pests from areas outside the Specified Area and excludes all livestock.

This Operating Plan **does not apply** to:

- The use of Pestoff® Rodent Bait 20R by a person authorised by the Department of Conservation on offshore islands that do not have livestock present at any time.

1.2. Legislation

The following legislation must be followed during the use of this Operating Plan:

Hazardous Substances and New Organisms (HSNO) Act 1996

Pestoff® Rodent Bait 20R is approved (HSR001612) with controls in accordance with the provisions of the HSNO Act and Regulations, including relevant EPA Notices.

Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997

Pestoff® Rodent Bait 20R is registered (V009014) under the ACVM Act with conditions. These conditions and the product label directions must be met by all users of the product

Health and Safety at Work (HSW) Act 2015

Requirements around the use of brodifacoum specified in the Health and Safety at Work (Hazardous Substances) Regulations, including relevant Safe Work Instruments.

Resource Management Act 1991

Part III section 15 of the Resource Management Act prohibits the discharge of contaminants into the environment unless it has been expressly allowed for in a regional plan, resource consent or by regulation.

1.3. Approval

This Operating Plan has been approved by MPI under Section 28 of the Agricultural Compounds and Veterinary Medicines Act (1997).

1.4. Maintenance and Review

This Operating Plan will be reviewed when any significant new information as a result of using the Operating Plan becomes available. Reviews will involve Project Managers and personnel from operations where the Operating Plan has been used, and any other relevant persons with an interest in the outcomes of the Operating Plan.

Where a review results in the Operating Plan being updated, the revised document must be approved by MPI before it is used.

1.5. Accountability

To ensure the operation is completed to a high standard and all the requirements and standards of the Operating Plan are met it is essential that a Project Manager is appointed for all operations. The Project Manager's role is to manage the operation on behalf of the client

and to ensure that the operation complies with all requirements of this Operating Plan.

While it is the responsibility of the Project Manager to ensure the standards are met, tasks may be delegated, in writing, to others if they have the appropriate training, expertise and experience. Where this occurs, acceptance of delegation must be signed for by the delegate.

1.6. Standards

Standards are stated within the operational requirements of this Operating Plan. These standards must be met for all rodent eradications undertaken under this Operating Plan and form the basis for operational compliance checks (see Appendix 3.2) and audits.

2. OPERATIONAL REQUIREMENTS AND STANDARDS

2.1. Project Management

Outcome

The operation is actively managed to meet all the compulsory standards of this Operating Plan.

Compulsory Standards

- 2.1.1. All operations will appoint a Project Manager.
- 2.1.2. The Project Manager will be familiar with the planning and operational details of the project before operation is implemented.
- 2.1.3. The Project Manager will be accountable for the operation meeting all the standards of this Operating Plan.

Deliverables

1. An accountable Project Manager is appointed.

2.2. Planning

Outcome

The planning for the operation is undertaken to a high standard to establish clear goals, maximise the chance of success and adequately manage environmental effects.

Compulsory Standards

- 2.2.1. A peer reviewed Feasibility Study is prepared before finally committing to an operation. This study should:
 - Fully evaluate the social, cultural and biological context against the principles of eradication; and
 - Identify all issues to overcome to deliver and sustain the stated goals and predicted outcomes with the maximum chances of success.
- 2.2.2. A peer reviewed Assessment of Environmental Effects (AEE) is prepared. The AEE shall:
 - Provide clear evidence that all non-target (native species, livestock and domestic animals, and human) risks have been considered; and
 - Identify any necessary mitigations to manage adverse effects that need to be in place before the operation commences.
- 2.2.3. A peer reviewed Operational Plan is prepared. This document will:
 - Take account of the issues and complexities raised in the feasibility study and AEE; and
 - Clearly outline the design, roles, actions, logistics and timeline to achieve project goals, meet legal requirements and undertake required mitigations.
- 2.2.4. The peer reviews will be carried out by a person experienced in animal pest eradication

and ecological restoration, who is not directly involved in the operation. The reviews will be provided in a written form.

- 2.2.5. The Project Manager will keep a record of the drafts submitted for review, what actions, if any, were taken in response to the peer review feedback. A reason must be given where no action is taken.
- 2.2.6. A Risk Management Plan that identifies the key risks and how they will be managed (including those in 2.13) must be included in the operational plan.
- 2.2.7. A Biosecurity Plan is prepared that identifies potential sources of pest re-invasion and any necessary mitigations required to prevent/address this re-invasion.

The purpose of the peer review is to provide a qualified written critique of the documents. It should also provide advice to the Project Manager on strategies or tactics which could reduce the risk of failure and likelihood of any unforeseen or unintended adverse outcomes on the environment or communities; both within and surrounding the Specified Area.

Deliverables

1. A Feasibility Study report;
2. An Assessment of Environmental Effects;
3. An Operational Plan, including a Risk Management Plan;
4. Peer review comments on each document;
5. A record of revisions undertaken in response to the peer review; and
6. A Biosecurity Plan.

2.3. Consultation

Outcome

To seek community and tangata whenua views on the effects of the operation.

Compulsory Standards

- 2.3.1. Identify all affected parties and consult on the effects of the operation with them.
- 2.3.2. Where the treatment area includes land in public ownership, consultation on effects of the operation with local iwi and/or hapu is compulsory for aerial operations and recommended for hand broadcast and bait station operations.
- 2.3.3. Should there be significant public concern about an operation, the local DHB public health unit may be consulted. Any reasonable suggestions made by the public health unit, intended to manage potential public health risks, should be complied with by the Project Manager.
- 2.3.4. A written record of all consultation undertaken and the outcomes of the consultation will be kept.

Deliverables

1. A written record of all consultation undertaken and the outcomes of the consultation;
2. Operational plan revised in response to consultation and agreed conditions arising from the consultation.

2.4. Consents

Outcome

Consents required for the operation are obtained prior to bait application.

Compulsory Standards

- 2.4.1. The consents required are identified correctly in the operational plan.
- 2.4.2. All consents are obtained prior to bait application.
- 2.4.3. The owners and/or occupiers of land within the Treatment Area must give written permission for the application of bait on their property. This includes holders of grazing licences, lessees, and the relevant land administering agency where the operation includes riparian strips, paper roads and unallocated crown land.
- 2.4.4. Where it is intended to aerially sow bait on the boundary of the Treatment Area, and livestock are normally grazed on the adjacent land, the Project Manager shall seek written agreement from relevant landowners and graziers to de-stock adjacent paddocks prior to the bait application/s. The paddocks are to remain free of stock for a minimum of 60 days after the last application of bait or until monitored bait has degraded to a condition score of at least five (see Appendix 3.3), whichever is longer.
- 2.4.5. Where such agreement with adjoining owners cannot be reached, a buffer zone of at least 15 metres inside the Treatment Area boundary will be treated by ground application only.

Deliverables

1. Landowner/occupier consents obtained.
2. All other required consents obtained.
3. Operational Plan is revised for consistency with all consent conditions.

2.5. Bait purchase

Outcome

Pestoff® Rodent Bait 20R purchased is only used for the declared project location and in accordance with the Operating Plan.

Compulsory Standards

- 2.5.1. Only Pestoff® Rodent Bait 20R is to be applied aerially or hand broadcast.
- 2.5.2. The following details will be provided to Animal Control Products Ltd at the time of bait purchase:
 - a) Name and location of project

- b) Name, address and contact details of client
 - c) Name, address and contact details of Project Manager
 - d) Quantity of bait required
 - e) Date bait required
 - f) Delivery destination
 - g) The Operational Plan for the project or other documents detailed under the Operating Plan if requested by Animal Control Products Ltd.
- 2.5.3. A record of the amount of bait purchased, delivered to the Specified Area, applied to the Treatment Area and remaining upon completion of the operation shall be kept by the Project Manager.
- 2.5.4. A record is kept of the method of disposal of any unused bait.
- 2.5.5. The information provided to the bait supplier will be made available to MPI upon request.

Deliverables

1. There is a written record of the quantity of Pestoff® Rodent Bait 20R purchased and where it will be used.
2. There is a written record of the quantity of Pestoff® Rodent Bait 20R used and the fate of any unused bait.

2.6. Pest Proof Fencing

Outcome

Where the Specified Area is enclosed or protected by a pest proof fence, the fence effectively prevents access to the Specified Area by all livestock and target pests.

Compulsory Standards

- 2.6.1. All non-island Specified Areas will be fenced to prevent pest and livestock re-entry.
- 2.6.2. Fences must be of a design and specification which has been tested and proven to effectively prevent access to the Specified Area by all livestock and target pests. Documentation proving this must be held by the Project Manager.
- 2.6.3. Fences must be located and constructed to minimise the risk of damage to them, and to a standard which gives a reasonable expectation that they can be maintained fit for purpose.
- 2.6.4. All permanently flowing streams and ephemeral channels entering or exiting the fenced part of a Specified Area must have a structure that:
 - Is proven to prevent pest re-invasion;
 - Prevents bait being carried out of the Specified Area (or temporarily modified during bait application to achieve this purpose); and
 - Is constructed to a standard which gives a reasonable expectation that it can be maintained fit for purpose.

- 2.6.5. A fence maintenance plan that provides the resources and mechanisms by which the fence and associated structures (e.g. gates and water crossings) will be maintained in a fully effective condition will be produced.
- 2.6.6. An independent person experienced in pest proof fence design and construction must inspect the completed fence prior to bait application. The person inspecting the fence will provide a written report to the Project Manager verifying the fence and all stream and waterway crossings are effective as a barrier to mammalian pests and livestock. The report will also verify that the maintenance plan, if correctly implemented will keep the fence and associated structures fit for purpose given the location, terrain and climate.

Deliverables

1. A pest proof fence that is designed and constructed to a high standard.
2. A fence maintenance plan.
3. A fence inspection report.

2.7. Notification

Outcome

Stakeholders and the local community are informed about the planned operation.

Compulsory Standards

- 2.7.1. Where Pestoff® Rodent Bait 20R is being applied aerially, a public notice must appear in a newspaper available in the area in which it will be applied. The public notice must be published within two months, but not less than two weeks before the first bait application.

The public notice must include the following:

- The name of the product, bait description, active ingredient and concentration, and method of applying the bait;
 - The date of intended pesticide application;
 - A map showing the location of the Specified Area and any commonly known features (e.g. districts, roads) that may identify the place;
 - The location where the public may view maps of the Specified Area and the times when such maps can be viewed; and
 - The contact details of the Project Manager responsible for the operation.
- 2.7.2. All landowners/occupiers within and immediately adjoining the Treatment Area are notified of the operation at least 24 hours before each bait application.
- 2.7.3. Where a person has specifically requested to be notified of the operation during the consultation, they must be notified at least 24 hours before each bait application.
- 2.7.4. A written record of all notifications will be kept. The record must include:

- Who was notified;
- How the information was communicated;
- What information was communicated;
- The date and time of communication; and
- The name of the person who undertook it,

Deliverables

1. A record of all notifications.

2.8. Equipment

Outcome

Equipment allows bait to be aerially applied in a safe and effective manner.

Compulsory Standards

- 2.8.1. Only rotary wing aircraft shall be used for aerial application of Pestoff® Rodent Bait 20R.
- 2.8.2. Global Positioning System (GPS) navigational guidance equipment shall be used on all aircraft applying the bait. The GPS must be capable of:
 - Real time guidance to the pilot along pre-determined flight lines;
 - Recording flight lines when sowing/not sowing; and
 - Exporting the data recorded into software that can display a map showing the flight lines.
- 2.8.3. All sowing buckets and equipment must have known maximum and usable swath widths, and proven capability to deliver the required sowing rates for the bait being used. Records of each bucket's calibration are to be kept.
- 2.8.4. Sowing buckets that will be used to apply bait within 25 metres of a boundary pest proof fence must have a certified maximum swath width of less than 10 metres, or be tested, and proven in practice, to directionally sow bait.
- 2.8.5. Covers designed to prevent bait being lost out of the top of the bucket must be fitted to sowing buckets when flying outside the Treatment Area. This includes turning outside the treatment area.
- 2.8.6. Covers designed to prevent bait being lost out of the top of the bucket must be fitted to sowing buckets when flying along sensitive boundaries.

Deliverables

1. The aircraft, GPS navigational guidance, aerial baiting equipment and mapping software to be used, are detailed in the operational plan.
2. Certification details for all equipment and bucket calibration records.

2.9. Exclusion of Livestock

Outcome

Livestock that graze in the Treatment Area are not exposed to brodifacoum.

Compulsory Standards

- 2.9.1. Where bait application is to occur in areas where livestock are grazed, all livestock must be removed prior to the application of baits. This will be verified by physically checking the areas within 24 hours prior to the bait application.
- 2.9.2. Bait breakdown monitoring within areas where livestock are grazed must occur following the last application of baits.
- 2.9.3. Livestock are not to be returned to pasture within the Treatment Area for a minimum of 60 days after the last application of bait, or until the monitored bait has a condition score of at least five (see Appendix 3.3), whichever is longer.
- 2.9.4. No hay or grass products are to be taken off the Treatment Area for livestock feed purposes for a minimum of 60 days after the last application of bait, or until the monitored bait has a condition score of at least five (see Appendix 3.3), whichever is longer.

Deliverables

1. No livestock are present in the Treatment Area while bait is being applied or while it may be present.
2. For areas where livestock will be returned, or hay or grass products will be harvested for feed purposes, a record of bait breakdown monitoring is kept.

2.10. Operational Boundaries

Outcome

Bait is applied solely within the Treatment Area.

Compulsory Standards

- 2.10.1. Where Pestoff® Rodent Bait 20R is to be applied aerially, all operational boundaries and exclusion zones shall be physically flown, logged and recorded onto on-board GPS navigational guidance system of at least one of the aircraft being used in the operation before it begins baiting. This data should be transferred to all other aircraft being used for bait application before they begin baiting.
- 2.10.2. All relevant Treatment Area boundaries must be physically inspected within 24 hours prior to bait application to ensure that no livestock are present in adjoining paddocks, transit flight paths or loading sites (where they occur outside the Treatment Area).
- 2.10.3. Paddocks adjoining the Treatment Area will be de-stocked prior to the application of baits. If de-stocking cannot be achieved, bait is not to be aerially applied within 15 m of the relevant boundary.

- 2.10.4. The pilot receives copies of all relevant consents and approvals and a hard copy of the operational map showing treatment boundaries, sensitive boundaries, trickle/directional sowing sowing blocks, loading sites and designated transit flight paths to/from the operational area if the loading site is outside the Treatment Area.
- 2.10.5. All Treatment Areas within 25 metres of a boundary pest proof fence will be sown with trickle/directional buckets.
- 2.10.6. No aerial baiting shall occur within 25 m of boundaries when wind speeds exceed 20 kilometres per hour towards such boundaries.
- 2.10.7. All boundary areas where the fences are obscured from the air, have sharp angles or pose a risk in terms of stock access to bait for any other reason shall be treated by ground application only.
- 2.10.8. Following each bait application all paddocks adjoining the Treatment Area will be physically checked for misapplied baits within 24 hours. If bait is found, then the standards in 2.13 must be applied.

Deliverables

1. Electronic mapping files showing operational boundaries, sensitive boundaries and exclusion zones, as logged to the onboard GPS navigational guidance system of the aircraft.
2. Maps of areas treated by ground application.
3. Maps showing GPS logs of boundary checks.
4. A record of the paddock inspections carried out following each bait application.

2.11. Loading Sites and Transit Flight Paths

Outcome

The loading site and transit flight paths are designed and managed to prevent livestock exposure to toxic baits.

Compulsory Standards

- 2.11.1. Loading sites (including refuelling sites) shall, where practicable, be located within the Treatment Area.
- 2.11.2. Where a loading site cannot be located within the Treatment Area, the loading site and transit flight paths to/from the Treatment Area will be cleared of livestock and if necessary fenced to a stock-proof standard. Livestock must be excluded from these areas during the operation. The loading site and transit flight paths shall:
 - Be clearly shown on the operational map.
 - Entered onto the on-board GPS navigational guidance equipment of all aircraft involved in the operation. A GPS record of all transit flight paths flown must be kept.
 - Physically inspected for bait within 24 hours after each bait application. If bait is found then the standards in 2.13 must be applied.

1. The boundaries of the loading site are clearly marked and loading site signs erected. At the end of every day of the operation (including the final day), the loading site and any storage area must be fenced so that people do not inadvertently enter the site and stock cannot gain access to the area. The fence and signs remain in place until the Project Manager judges that there is no longer a risk to stock.

Deliverables

1. An operational map, showing all loading sites and all transit flight paths.
2. Electronic mapping files showing all transit flight paths, as logged to the onboard GPS navigational guidance system.

2.12. Exclusion of Water Sources

Outcome

Brodifacoum baits will not enter any water supply intake within, or downstream from, the Treatment Area, whether it is for stock water or human consumption.

Compulsory Standards

- 2.12.1. Drinking water supply intakes within the Treatment Area (including roof water collection downpipes) will be disconnected during bait application if requested by the owner(s) or user(s) of the supply. An alternative drinking water supply will be provided if requested by the owner(s) or user(s) of the supply.
- 2.12.2. All stock water intakes within the Treatment Area are to be disconnected, and any stock water troughs/water sources within the Treatment Area emptied and/or covered prior to aerial applications.
- 2.12.3. Prior to reconnection of water intakes, down-pipes and the use of troughs/water sources, they will be checked and confirmed to be absent of baits.

Deliverables

1. A record of drinking water supplies and stock water intakes that were disconnected prior to toxic bait application, including dates for disconnection, details of post-operational checks and dates for reconnection.
2. A record of stock water troughs and water sources that were emptied and/or covered prior to toxic bait application, including dates for emptying/covering, details of post-operational checks and dates for reconnection.

2.13. Incident Management

Outcome

Procedures for effectively managing incidents are planned and executed when required.

Compulsory Standards

- 2.13.1. The operational plan covers incident management procedures which include notification and initial response actions where appropriate to prevent brodifacoum entering the human food chain.
- 2.13.2. An Incident Log will be maintained that records:
- Location of where bait was, or suspected of being, misapplied or spilt;
 - All actions taken in response to the incident;
 - Communication with landowners/occupiers and consent authorities in relation to the incident;
 - Where livestock access to baits was suspected, communication with MPI and the owners of the livestock; and
 - Bait breakdown monitoring, for any affected areas where livestock will be returned.
- 2.13.3. All possible accidental releases of bait, as shown on flight logs, are checked and resolved.
- 2.13.4. Where toxic bait is, or is suspected of being, misapplied or spilled outside the Treatment Area (including at loading sites and along flight transit paths), the following procedures shall be carried out immediately:
- The affected area will be de-stocked, thoroughly searched and all baits found picked up for safe disposal;
 - The affected area will be fenced off to a stock-proof standard and warning signs posted; and
 - The destocked animals will either be kept separate from other similar unaffected animals or be individually marked so they can be easily identified.
- 2.13.5. The nature and quantity of the misapplied or spilled bait is reported within 24 hours to:
- The client;
 - All consent providers;
 - Each land owner or occupier of the land on which the bait may have been misapplied/spilt;
 - The owner of any livestock that were present in the affected area;
 - The Regional Council and Medical Officer of Health in whose area the bait may have been misapplied/spilt; and
 - The EPA via an email to hsincidents@epa.govt.nz .
- 2.13.6. If livestock are suspected to have accessed bait for any reason, the Project Manager will immediately notify the Approvals and ACVM Groups at MPI and provide information on number of animals affected, the quantity of baits consumed and other relevant information. MPI Approvals and ACVM Groups will provide direction on the appropriate management of any affected livestock.
- 2.13.7. Livestock will be excluded from the affected area for a minimum of 60 days after the last application of bait, or until the monitored bait has a condition score of at least five (Appendix 3.3), whichever is longer.

Deliverables

1. Incident management procedures in the operational plan.
2. An Incident Log of all adverse events, remedial actions taken and investigations.

2.14. Documentation & Records

Outcome

A complete record of the operation is kept and made available to MPI, Regional Councils and consent providers upon request.

Compulsory Standards

- 2.14.1. A Compliance Checklist (Appendix 3.2) is prepared prior to bait application.
- 2.14.2. Detailed records of all correspondence and reports (including all records specifically identified in the Operating Plan), in chronological order, will be kept for each operation.
- 2.14.3. A report on the operation be completed within 6 months of the operation being completed. The report must include the following information:
 - Location and description of site;
 - Target species;
 - Methodology (including amount of bait used and application method);
 - A map showing boundaries of the Specified Area, Treatment Area, loading sites and transit flight paths, land tenure and adjacent owners, including leased land;
 - The date of each application;
 - Flight line print outs (including transit flights between loading site and Treatment Area where the loading site is outside the Treatment Area);
 - Weather forecasts covering aerial application, and actual weather conditions at the time the bait was applied;
 - Details of post operational inspections of all loading sites, flight paths, and boundaries for baits;
 - Details of all actions undertaken and outcomes achieved in relation to water supplies within the Treatment Area;
 - Any incidents that occurred, including amount of bait misapplied/spilt;
 - The method of disposal of any excess bait;
- 2.14.4. Copies of plans, operational files, records and reports shall be made available to the ACVM Group, Regional Council, Animal Control Products Ltd and consent providers by the Project Manager on request.

Deliverables

1. Completed Compliance Checklist.
2. Detailed communication records.
3. Operational report completed.

3. APPENDICES

3.1. Definitions

<p>Affected party</p>	<p>A person/party who is 'affected by the operation in a manner different from the public generally'. Being 'interested' in a manner different from the public generally is not been enough to be considered an affected party. Examples of affected parties include:</p> <ul style="list-style-type: none"> • Owners and occupiers of the land where the operation is occurring; • Owners and occupiers of adjacent, nearby and/or downstream land; • Tangata whenua; • Any Minister of the Crown with statutory responsibilities for land where the operation is occurring that could be adversely affected; • Relevant district or regional councils; and • Persons or organisations whose use or enjoyment of an area could be adversely affected.
<p>Client</p>	<p>The owner, administrator, agency or organisation that has engaged a Project Manager to undertake a project involving the aerial and/or hand broadcast application of Pestoff® Rodent Bait 20R within a Specified Area.</p>
<p>Consultation</p>	<p>Consultation involves seeking community and tangata whenua views on issues and proposals. It involves a willingness to adapt the proposed operation as a consequence of the information gained from consultation. While the control method (i.e. the use of Pestoff Rodent Bait 20R) may have been decided, there can still be discussion about the concerns people have and scope for modifying the operational plan as a result.</p>
<p>Effective Pest proof Fence</p>	<p>A fence design that has a proven ability to effectively exclude all target mammalian pests and livestock in and adjoining the Specified Area.</p>
<p>Island</p>	<p>A tract of land completely surrounded by a water body sufficiently large that reinvasion of rodents from other islands or from adjacent mainland area is manageable.</p>

Livestock	Any animal farmed with the intention of being slaughtered for human consumption or pet food.
Maximum Swath Width	Twice the longest distance (measured perpendicular to the flight line) from the flight line to the furthestmost bait on either side. This width is used when considering how far from an exclusion zone a helicopter should fly when flying parallel to such a boundary.
Notification	Notification involves informing the local community, stakeholders, visitors and users about the operation. Notification is not consultation. Consultation involves a willingness to adapt the proposed operation because of the information gained from consultation. Notification does not involve that commitment.
Operation	Any operation involving the aerial and/or hand broadcast of Pestoff® Rodent Bait 20R under this Operating Plan, whether on off-shore islands or within a Specified Area enclosed or protected by an effective pest proof fence.
Operational Plan	A document that details how Pestoff® Rodent Bait 20R will be applied to a proposed Specified Area and the risk management actions to be undertaken, in accordance with this Operating Plan, to ensure brodifacoum residues in humans or livestock do not result.
Operator	Company/person employed to apply Pestoff® Rodent Bait 20R.
Peer Review	A process of review by a suitably qualified person or persons, independent of a project where application of Pestoff® Rodent Bait 20R is proposed, who has/have relevant expertise in pest eradication and ecological restoration.
Project	A management proposal that involves the aerial and/or hand broadcast application of Pestoff® Rodent Bait 20R over a Specified Area whether on off-shore islands or enclosed or protected by an effective pest proof fence.
Project Manager	Appointed manager of a project that involves the aerial and/or hand broadcast application of Pestoff® Rodent Bait 20R over a Specified Area whether on off-shore islands or enclosed or protected by an effective pest proof fence.
Sensitive Boundary	A boundary designated by the Project Manager as requiring extra precautions being taken to avoid bait crossing the boundary.

Specified Area	<ul style="list-style-type: none"> • Islands where livestock are normally present; • Islands that do not have livestock present at any time and the operation is not being authorised/undertaken by the Department of Conservation; • Peninsulas which are partially surrounded by a water body which acts as a barrier to pest reinvasion, and where it is connected to a larger body of land, has an effective pest proof fence which minimises reinvasion by target pests and excludes all livestock. • Sanctuaries enclosed by an effective pest proof fence which prevents reinvasion by target pests and excludes all livestock.
Stock-Proof Standard	A fence that will reasonably exclude all types of livestock farmed on the land in question.
Treatment Area	The area within the Specified Area where Pestoff® Rodent Bait 20R is to be applied.
Usable Swath Width	Twice the shortest distance (measured perpendicular to the flight line) from the flight line to the furthestmost bait on either side. This is to prevent gaps in bait sowing when a bucket throws baits further to one site.

3.2. Compliance Checklist for Operating Plan Standards

Standards	Deliverable	Where is compliance documented?	Status
2.1	Accountable Project Manager appointed		
2.2	Feasibility Study Report		
	Assessment of Environmental Effects		
	Operational Plan		
	Peer review of documents		
	Record of revisions undertaken in response to the peer review		
	Risk Management Plan		
2.3	Biosecurity Plan		
	Record of all consultation undertaken and outcomes of the consultation		
2.4	Operational plan revised in response to consultation		
	Landowner/occupier consents		
	All other required consents		

	Operational Plan consist with all consent conditions		
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Standards	Deliverable	Where is compliance documented?	Status
2.5	Record of the quantity of Pestoff® Rodent Bait 20R purchased and where it will be used		
	Record of the quantity of Pestoff® Rodent Bait 20R used and the fate of any unused bait		
2.6	Pest proof fence designed and constructed to a high standard		
	Fence maintenance plan		
	Fence inspection report		
2.7	Record of all notifications		
2.8	Aircraft, GPS navigational guidance, aerial baiting equipment and mapping software detailed in the operational plan		
	Certification details for all equipment and bucket calibration records		
2.9	No livestock are present in the Treatment Area while bait is being applied or while it may be present		
	Record of bait breakdown monitoring for areas where livestock will be returned, or hay or grass products will be harvested for feed purposes		

Standards	Deliverable	Where is compliance documented?	Status
2.10	Electronic mapping files showing operational boundaries, sensitive boundaries and exclusion zones, as logged to the onboard GPS navigational guidance system of aircraft		
	Maps of areas treated by ground application		
	Maps showing GPS logs of boundary checks		
	Record of the paddock inspections carried out following each bait application		
2.11	Operational map shows all loading sites and all transit flight paths		
	Electronic mapping files showing all transit flight paths, as logged to the onboard GPS navigational guidance system		
2.12	Record of drinking water supplies and stock water intakes that were disconnected prior to toxic bait application, including dates for disconnection, details of post-operational checks and dates for reconnection		
	Record of stock water troughs that were emptied and/or covered prior to toxic bait application, including dates for emptying/covering, details of post-operational checks and dates for reconnection		
2.13	Incident management procedures in the operational plan		
	An Incident Log of all adverse events and investigations		

Standards	Deliverable	Where is compliance documented?	Status
2.14	Completed Compliance Checklist		
	Detailed communication records maintained		
	Operational report		

3.3. Bait Condition Scoring

Condition 1: Fresh Pellets/Pellets not discernible from fresh bait.

Condition 2: Soft pellets. <50% of pellet matrix is or has been soft or moist. Bait is still recognisable as a distinct cylindrical pellet, however cylinder may have lost its smooth sides. <50% of bait may have mould. Bait has lost little or no volume.

Condition 3: Mushy Pellet. >50% of bait matrix is or has been soft or moist. <50% of pellet has lost its distinct cylindrical shape. >50% of bait may have mould. Bait may have lost some volume.

Condition 4: Pile of Mush. 100% of bait matrix is or has been soft or moist. Pellet has lost distinct cylindrical shape and resembles a pile of mush with some of the grain particles in the bait matrix showing distinct separation from the main pile. >50% of bait may have mould. Bait has lost some volume.

Condition 5: Disintegrating Pile of Mush: 100% of bait matrix is or has been soft or moist. Pellet has completely lost distinct cylindrical shape and resembles a pile of mush with >50% of the grain particles in the bait matrix showing distinct separation from each other and the main pile. >50% of bait may have mould. Bait has definitely lost a significant amount of volume.

Condition 6: Bait Gone: Bait is gone or is recognisable as only a few separated particles of grain or wax flakes.

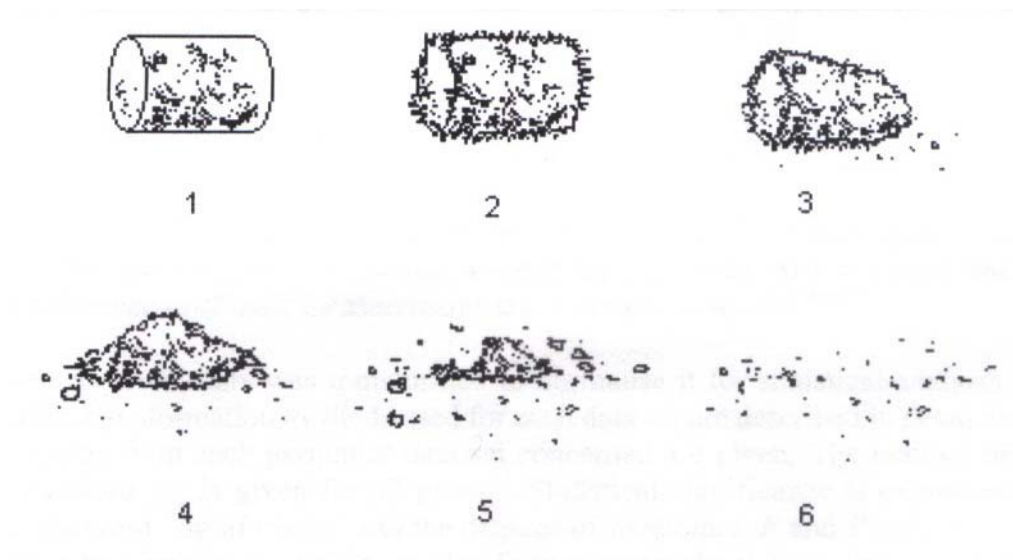


Illustration of typical bait condition at each ordinal score used in the trial (figure reproduced from Craddock, 2004).