



Submission to the Game Panel Workshop. 7th September 2007.
Lincoln University

New Zealand Deer Industry
On Behalf of the New Zealand Deer Farmers' Association and Deer Industry New Zealand

1. The classification and status of game and the primary export product venison as derived from farmed game (deer) has been central to the development of the industry and position in the export markets of the world, and particularly the dominant European market.
2. Exports of farmed venison now valued at \$262M (Sept 2006) and estimated at ~\$300m for 2007 year, have a dominant position in world exports and enjoy a European tariff relief (2% as in contrast to 14% for other farmed livestock) and a marketing background that competes with other sources of game from around the world in essentially a niche seasonal market.
3. Since the first negotiations with MAF in the 1970's the Deer Industry has solidly argued, and been supported in product legislation, that the product is classified as game, processed in designated deer slaughter plants in contrast with other domestic livestock slaughter houses and inspected under specific regulation through MAF (now NZFSA) as farmed game. Industry continues to advocate for that in contrast to other farmed livestock.

History.

4. The deer industry owes its existence to the far sighted risk takers who developed market opportunities from the encouraged planned reduction of vastly overpopulated wild deer herds throughout the country in the 1960's for the twin products of venison and velvet antler.

5. That success story, embodied through the skills of the helicopter recovery industry and the subsequent live capture and rapid spread of early deer farms is well known. Deer farmers retain a strong affiliation with that history as many of the pioneers were/are hunters, or have backgrounds in the early recovery operations or farmed the land adjacent to the numerous sources of wild deer.

6. The industry recognises the source animals as a valuable resource as founding stock for the now successful and significant farming industry and continues to support their recognition formally as a game resource.

We note:

- Since the early 1970's wild deer herds have been successfully reduced in number and in many areas arrested the habitat damage of over population
- Wild stock quality has improved and provides a recreational resource of improved hunting experience and trophy potential.
- In specific areas of national conservation importance,(eg Mt Taranaki, Northland, Coromandel, Banks Peninsular) deer have been eliminated and with DoC overview, support from the AHB and the deer industry farming practices and restrictions have allowed that status to continue
- The Deer industry has supported and advocated for the use of deer repellent baits in vector control operations for Tb control. Except in some specific disease problem areas deer are not regarded as significant Tb reservoir risks.
- While the wild deer recovery industry has been quieter since the advent of farmed venison exports, and is particularly vulnerable to any price slumps in the farmed product, there remains a body of expertise that can and do target populations as they increase and exert numbers control.
- Currently there is some demand for feral product in the Fiordland World heritage park area and West Coast, and a responsible well disciplined group (SAGRA) is harvesting wild deer for commercial export, and managing populations of deer in these sensitive areas.
- The NZDFA is an affiliated Society to the Game and Forest Foundation (GAFF) and supports the aims and principles of that group particularly in promotion of game as a resource. The industry strongly supports principles of game management to promote balance in numbers and sustainable harvest and environmental balance for wild deer and supports moves to have these recognised as legitimate aspects of managing a game resource.

Current regulations and implications for the deer industry.

7. Since the inception of increasing deer farming, deer have been under the legislative control of the ancient and outmoded Wild Animal Control Act (1977) administered through the Department of Conservation. Legislation has covered where species of deer may be farmed and through various Gazette Notices (Current: Gazette Notice No 4, 1986) have defined both restrictions by species and that link to the outmoded concept of feral range, and fence specifications by species.

8. Early application of that legislation required permitting to farm, fence inspections, limitations of inter island travel of some less common species of deer, and a duty to report and actively recover any escaped deer.

9. While this legislation may have had some value and application in the early years, the legislation has been largely ignored as being low priority in many conservancy areas, and by newer farmers as they entered the industry essentially as each recognised there was little need or practical relevance in this legislation from the mid 1980's on.

- Farmed deer proved remarkably adaptable to the development of modern farming techniques, sophisticated commercial fence solutions, rapidly improving nutrition and management systems.
- Deer farming became quickly accepted as a new modern responsible farmed livestock industry. Farmers were on the whole responsible and with the development of the Game Industry Board quickly developed industry wide objectives involving Farm Quality Assurance programmes that included fence security, product quality and the at the time leading from pasture to plate QA programmes, supporting the highest quality standards of product, uniquely "Farmed Game"
- Legislation through the establishment of dedicated Deer Slaughter Plants (DSP) offering pre and post mortem slaughter inspection and the highest standards of carcase health and food safety inspection developed. This in turn was supported by transport codes and legislation and all the other trappings of a sophisticated livestock industry.
- Today deer farmers participate, often at considerable expense, in a formal mandatory ear tag based individual and herd identification scheme under the Biosecurity Act 1993, and the Animal Health Boards National Pest management strategy for Bovine Tuberculosis eradication. They take responsibility for the costs of their own testing, and do not seek compensation for any deer lost to the Tb programme true Tb or not based on a good but imperfect biological test. Current there are only 18 infected deer herds identified as infected.
- Escaped tagged deer have protection under conditions if they are identified by an official identification scheme, ie they are not recognised as wild animals that can be indiscriminately shot should they escape. Equally

- the responsibility of owners to be liable for damage, etc and wandering stock also apply
- In addition farmed deer are:
 - Supported in their welfare through the just established Code of Welfare (Deer) 2007, (the first pastoral based industry code) and its associated legally binding minimum standards.
 - A transport code is being revised at present
 - Represented as a key industry to be involved in the National Animal Identification and Traceability (NAIT) programme that will have national and international biosecurity, market access and food safety implications
 - Practically in 35 years of deer farming (7-8 generations) the wild base resource has developed into a true new domesticated animal that retains its essential characters in the venison product supplied and is farmed in as natural low input and efficient way as possible utilizing and adapting the principle of sheep and cattle pastoral farming.
 - The modern farmed deer can have genetic input through the most sophisticated AI and ET breeding technology known to farming utilizing genetics from leading bloodlines sourced around the world. Equally they have been exported as live animals to many international destinations.
 - Research on the biology, physiology and behaviour of deer in the farmed environment and NZ industry has aided world wide game management applications and basic science that leaves the industry acknowledged as world leading in many aspects including ecology and sustainability and unquestioned leadership in antler production and biology
 - Leading deer farmers have further diversified a multi product farmed game animal and established a sophisticated trophy park and managed hunting industry setting new benchmarks in antler records for red deer, and adding a new dimension to international recreational and tourism appeal. That core group also has established their own codes of fencing, biosecurity and operating practices that set new standards of operations.

Quite simply put the farmed deer industry has simply moved on from those initial days and legislative framework and its time for modernization of legislation as well.

10. All of these components combine to underpin this modern, high value uniquely NZ successful industry. The WAC Act descriptors labeling deer as noxious, the use of the term “pests in captivity” and indeed the current DoC review of the Gazette notice no 4 are no longer relevant to this industry. In that review the industry argues that its responsibility should be vested with MAF (Biosecurity, MAF Policy and NZFSA) and that the status of farmed and wild deer need to be seen as a resource that can be constructively managed in NZ’s greater good.

11. In responding to DoC on the proposed review and Draft Gazette Notice No 5 the Deer industry facilitated a series of workshops seeking a broad range of perspectives primarily around escaped deer, fence standards and relevance of legislation.

12. In that the combined organisations, DINZ, NZDFA, GAFF and association of Game Estates argued that deer farmers should and do have an acute awareness of the conservation values and areas in their local and regional areas. Escapes or risk to those community values were best dealt with at the local level in association with the local authority and DoC conservancies where appropriate. Essentially however deer (and other of the game species) were viewed as resource inside or outside the fence. The industry did not advocate shifting or introducing species to where there was no previous liberation (Eg whitetail in the North Island, sika in the south nor compromising deer or game free areas, by seeking expansion of farming.

- We support the preservation of the natural breeding range of current species in the wild with appropriate managed game policies to control that balance and provide the recreational and commercial enjoyment
- We are committed to ensuring farmers too, where species are held in sensitive areas act responsibly and with the community value in mind in that case of accidental escape.
- As an industry we are deeply concerned by illegal liberations of deer and pigs particularly from a Tb health risk to the programme, but also on environmental damage and risk grounds. The industry believes that increasing at the status of game animals as a resource in specific areas will add to that hunting attraction

13. Relevant to this review, the deer industry recognises the important role the feral venison recovery industry can play in game management numbers control quickly and effectively and profitably. There will be an emerging niche for wild game as farmed venison asserts itself in retail and a branded NZ QA and consumer ready product. The industry strongly supports recent NZFSA upgrades in regulation to ensure that this feral source too meets the highest standards ensuring its own success and complementing the farmed product.

Conclusion

14. The positive description of game animals in the free environment or on farm in all the diversification that the deer farming industry has developed over 35 years is a vital an important part of the future of the venison industry.

15. It is an appropriate time to formally recognise that legislation describing farmed deer as wild animals in captivity associated with terms like pests and noxious are removed from deer farming.

16. Legislation underpinning this \$300M plus industry, practiced by 3800 farmers should be relevant to the sophistication and commitment the industry demands of its farmers and that support the product streams

17. The Deer industry believes that classification (extended to Chamois and Tahr) is also timely and relevant. It's been proven that given the right incentives Game numbers can be kept in balance through the skills of commercial operators and recreational hunters.

International techniques of modern game management can have direct application in the NZ environment where local/regional interests review and establish emphasis and priority.

Note 1)

The New Zealand Deer Farmers Association

- 1 The New Zealand Deer Farmers Association represents ~2050 voluntary subscription paying levy paying members of an estimated 3800 currently active within the broad administrative framework of Deer Industry New Zealand and represents the majority of farmed deer in New Zealand.
- 2 It is a fully Incorporated Society that promotes the views and interests of the producers at all levels and is lead by an Executive Committee of 4 including the Chairman. An executive responsibility is now assumed by its Producer Executive within Deer Industry New Zealand.
- 3 The Association is regionally located through its 24 Branches and 3 Breed Societies and has a strong relationship with regional councils, related agricultural industries and its own industry relationships.
4. The NZDFA is affiliated to the New Zealand Game and Forest Foundation.

Deer Industry New Zealand.

- 1 Deer Industry New Zealand (2004) is a statutory industry body funded by levy and established under regulation to promote and assist with the orderly development of the deer industry.
- 2 New Zealand's deer industry comprises approximately 3800 deer farmers (most of whom also farm other species), 6 main venison processing/exporting companies and 25 main velvet processing/exporting companies.
- 3 The Board of Deer Industry New Zealand comprises representatives of all sectors of the deer industry.
- 4 Deer Industry New Zealand has responsibility for assisting with the administration and service delivery functions of the New Zealand Deer Farmers' Association (NZDFA). However, Deer Industry New Zealand and the NZDFA remain politically and structurally separate organisations.
- 5 New Zealand has the largest farmed deer industry in the world and is a significant livestock farming industry with annual exports of deer venison products are valued at approximately \$262 million (year ended June 2006) and an internal value estimated at in excess of \$2.4 billion in investment in animals and farming land and facilities .

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