



New Zealand Deer Farmers' Association

SUBMISSION TO
The Minister of Agriculture
National Bovine Tuberculosis Pest Management Strategy:
Amendment Proposal, September 2009

Submission of the New Zealand Deer Farmers' Association, Executive Committee
on behalf of NZDFA members.

PO Box 10-702
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30th November 2009

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Hon David Carter
Minister of Agriculture
MAF Biosecurity New Zealand
PO Box 2526
WELLINGTON

ATTN Belita Pereira

By email belita.pereira@maf.govt.nz

Dear Minister Carter

AMENDMENT PROPOSAL TO THE NATIONAL BOVINE TUBERCULOSIS PEST MANAGEMENT STRATEGY

Thank you for the opportunity to present a submission on behalf of the New Zealand Deer Farmers Association and deer farmers in general. In broad terms we are supportive of the aims and aspirations of the proposed strategy as outlined in the discussion paper and believe that the eradication of Bovine Tb from infected vectors in the wild is vital and key, and on farm (dairy, cattle and deer) is achievable and a welcome long term objective of this comprehensive proposal.

The NZDFA also advises it is in full support of the submission points raised by Deer Industry New Zealand particularly those in relation to funding principles, allocation of costs and relative industry contributions on cost allocation. We will summarise these points that DINZ covers in detail as part of the NZDFA submission.

BACKGROUND: NZDFA

- The New Zealand Deer Farmers' Association (NZDFA), an Incorporated Society, formally represents the producer views and interests of 3100 current known AHB and DINZ levy paying deer farmers through its 23 regional branches and 3 special interest breed societies and working groups.
- The Association, now in its 34th year, also represents the political and industry views of ~1800 active deer farmers who have paid a voluntary annual subscription, representing an estimated 65-70% of the farmed deer of NZ. It is headed by an elected 4 man Executive Committee. NZDFA is a member of the Animal health board, Inc, and is represented in its own right on the AHB Members committee.
- The NZDFA at branch level also takes an active role in representation on the regional AHB Tb Free committees with branches formally nominating a representative annually, and keep TB programmes and progress in front of their membership in recognition of the investment made historically and the ongoing goal of a Tb free deer herd status.
- The NZDFA recognises that in terms of proportion of levy contributed on products of venison and velvet antler, the AHB contribution from deer producers is its single largest spend and that deer farmers have voluntarily committed to further funding their own testing costs and unseen contribution in time and commitment and that deer farmers are passionate about removing the Bovine TB threat from their herds and take any relaxation or risk of increase in infected herd numbers seriously.

- The NZDFA has its administrative needs serviced by DINZ, but retains an independent political and lobby status through its Executive Committee and Branch structure. In this case in discussion of the proposed new NPMS DINZ and DFA are closely aligned and have spent considerable time and consultation in reaching a common view and in involvement in the Dairy Industry MAF Review group, AHB Representatives Committee and in discussion with a DFA working group of Tb free committee deer farming members.

Submission points.

- 1) The NZ Deer Farmers' Association led by the Executive Committee supports the broad principles as laid out in the National Bovine Tuberculosis Pest Management Strategy, September, 2009, outlining an eradication process for vectors associated with bovine TB and ongoing reduction and elimination of bovine Tb in domestic cattle and farmed deer herds from now until 2025, with the opportunity for 5 yearly review processes.
- 2) We believe that the operational principles related to vector control, roll back , staged eradication are well thought out and comprehensive and have we welcomed the opportunity to be involved by AHB in the development and consultation process.
- 3) We agree that the risk without such a programme will lead to serious production losses, and that the potential harm to NZ's reputation as a supplier of high quality beef, dairy, and venison and velvet antler products through rising TB infection levels is real and serious. We support the new NPMS proposal and recognise that eradication of Tb infected deer herds has been a major cost, passion and emphasis of the deer farmers and industry to date, and we have farmer representative assurance that this priority goal remains upper most in deer farmers' minds.
- 4) The deer industry also agrees that the risk of Tb disease resurgence in herds can be eliminated if Tb can be eradicated from possums and other key vectors in the VRAs. The industry is well aware that this does place considerable testing costs and management constraints on deer farmers. Large groupings of our deer farmers operate on land within the VRA's and MCA's and that in a sense these tests provide valuable sentinel security for all livestock farming in surveillance zones, but we believe deer farmers strongly support the concept proposed in spite of the implications of ongoing high testing costs for many.
- 5) Given that the NZDFA fully supports the proof of eradication concept proposed as strategy objectives. (Sec 8 and 8.1, Primary objectives), the NZDFA believes that it is important that the two key areas defined for proof of concept, now underway (Hauhangaroa programme and the Hokonui Hills programme) to demonstrate the feasibility of eradication of endemic TB from wildlife populations be completed and that associated funding and support from sector funders Government and the relevant Regional Councils be negotiated with and confirmed as having binding funding as a priority to demonstrate that feasibility of eradication in the first 5 year term of the proposed strategy.

- 6) The NZDFA also notes the assumption that achievement of the proposed strategy objectives assumes the continued ability to use the current range of vector control methods, especially the aerial application of 1080 poison baits. We see some significant longer term risk in that assumption as it relates to 1080, and are supportive on ongoing research into alternatives to 1080, and support the use of deer repellent baits in aerial application where there is clearly no risk of wild deer being or potentially becoming Tb vectors themselves. Where there is risk of disease we support effective control and eradication of infected deer to prevent spread or re infection of primary vectors. Irrespective we recognise the strategic importance of 1080 and believe current practice and controls on use and recent approvals for 1080 use by ERMA are robust in terms of the greater goal outlined in the proposed strategy.
- 7) The NZDFA also commits its ongoing support for the Tb free committee regional bodies and deer farming representation on that. This support has clear regional strength in the areas where disease is some what entrenched and there are considerable levels of regional and local skill and knowledge amongst farmer representatives and disease mangers and vector control programme leaders that add value to planning communication and confidence in these what will be increasingly important areas of the proposed strategy
- 8) The NZDFA appreciates the recognition of our earlier calls for reduced frequency and intensity of on farm Tb testing, and believes that on adoption of the proposed strategy that there needs to be frank and comprehensive dialogue to provide that relief for so many of our members who predominately operate closed herds sending 50% or more of contained stock directly to slaughter annually, which includes a proportion of older at risk animals.
- 9) In relation to Vector Risk Areas, the NZDFA disagrees with the current conservative maintenance of existing herd testing and movement control restrictions. NZDFA believes there is opportunity to accelerate the reduction of the areas under annual testing programmes and believes there is potential for equivalence programmes in closed herds in some areas. NZDFA requests that it has the opportunity to work with the AHB to identify and implement these opportunities.
- 10) NZDFA seeks urgent review of principles and the definition of buffer zones and VRA's. The organisation believes some tangible boundary reduction and relief for deer farmers in these areas is warranted, especially for those closed herds with high slaughter surveillance annually from young venison stock and a proportion of older capital herd animals. Deer farmers have been paying substantially in VRA zones for some time and NZDFA believes a reduction, without risking Tb detection programmes through some herd testing is warranted as buffer zones are established on very conservative principles in their view. NZDFA wishes to see a greater role for works monitoring in buffer zone herds.
- 11) We support the principle of the strategy that keeps herd infection levels at such a point that safeguards against market access risks, and avoids significant production losses.
- 12) NZDFA has been advised by many farmers that they have instinctive concerns about any greater blowout in infected herd numbers from the current 0.33% to 0.4% as portrayed in the new NPMS planning and would prefer to see that target maintained at current levels or kept on target to reduce to 0.2%, but accepts that funding levels and a change in emphasis to TB eradication in vectors may have a consequence in some Infected herd numbers increase in the short term as part of staged eradication.

- 13) The NZDFA also support the proposals outlined around tighter controls on stock movement from Movement Control areas, including notification of destination of stock under movement as part of the pretesting and declarations of movements, and note that the proposed NAIT programmes in time will facilitate greater tracking and accuracy in relation to this. The NZDFA believes that the proposed strategy needs to take more account of the potential of NAIT and its links and synergy with the AHB database and opportunity to reduce costs and duplications between these key data base systems.
- 14) We support the potential for post movement testing should circumstances and disease tracing demand it and the proposals around enhanced emphasis on special movement control areas, additional controls on infected cattle herds (as deer presently operate under) and particularly the clear obligations of operators of slaughter premises in the recording and reporting of official identification of slaughtered cattle and deer and suggest that the proposed 24 months implementation window following the introduction of the amended strategy be reduced to 12 months as we see no value in delay especially with the imminent introduction of NAIT as a mandatory RFID scheme.
- 15) Deer farmers will also keenly support moves to improve better reporting of TB and animal identification information from slaughter plants, as this has been a major concern and source of significant questioning and significant disadvantage to a number of farmers for many years.

Funding Levels and allocations of costs of the proposed NPMS and Implications.

1) The NZDFA shares Deer Industry New Zealand's view and primary concerns that there are major inadequacies around definitive cost sharing and associated rationale. We acknowledge that the strategy talks of maintaining at least current total funding levels as being essential (Crown, industry and Regional Councils) as a requirement for the success of the staged eradication and targeted roll back proposal.

2) However NZDFA supports of the DINZ's position particularly on the inequity of sector funding on which we have been consulted and also contributed to a working party on the independent view of a fair, principle based approach to industry funding of the proposed NPMS from Martin, Jenkins and Associates Ltd (Martin Jenkins).¹ The Martin Jenkins report is attached in full as Attachment 1 and links the NZDFA submission to these specific key points of the DINZ deer industry submission.

3) NZDFA agrees with the DINZ analysis of the regulatory basis prescription for a funding basis as "The proposed NPMS notes the funding principles set out in [Section 61](#)² of the Biosecurity Act. In summary, they require that a proposal for an NPMS should specify:

- The extent to which persons or classes of persons benefit from the strategy
- The extent to which persons or classes of persons create, continue or exacerbate the problems to be resolved by the strategy
- A rationale for allocation of costs.

The proposed NPMS states in relation to the above three points (point 17),
"Current TB strategy funding is guided by the funding principles set out in Section 61 of the Biosecurity Act."

DINZ noted that these are not funding principles. In fact, they are matters which must be specified in the proposal. The DFA supports this view.

¹ Martin Jenkins provided a principle based approach to the Members' Committee of Animal Health Board for the current strategy in 2002.

² Section 61 was substituted, as from 26 November 1997, by section [36](#) Biosecurity Amendment Act 1997, but the same wording applies.

4) In common with DINZ who have provided detail around these key submission points we support these following fundamental features of an equitable strategy as summarised in part by the Martin Jenkins report that:

Trade risk arising from TB is managed by an effective TB Strategy. This leads to markets remaining open, leading to higher farm gate earnings than if markets closed due to a high prevalence of TB in New Zealand in the absence of a TB Strategy

Production losses (due to culling diseased animals and low growth rates/milk production) are lowered due to an effective TB Strategy leading to higher farm gate earnings than if production losses were high due to high TB prevalence in New Zealand in the absence of a TB Strategy

The strategy's benefits ultimately accrue to farmers and impact on their farm-gate earnings and that the strategy's funding should be linked to gross farm gate revenue rather than export earnings or direct disease control costs or other production coefficients such as herd size."

4) Given that robust conclusion, the NZDFA strongly endorses these key points relative to the strategy and funding as laid out with supporting argument in the DINZ submission.

- 1 **That** all Members of the AHB, including Regional Councils should be obliged to support the proposed NPMS by putting mechanisms in place to ensure certainty of funding. **NZDFA also submits with DINZ** that the current situation is inequitable and should be remedied.
- 2 **That we request** consideration of ways to lower disease control testing frequency and costs.
- 3 **The NZDFA unreservedly supports DINZ's submission** that the proposed NPMS does not adequately identify the extent to which persons or classes of persons benefit from the proposed NPMS strategy or exacerbate the problem of bovine Tb. We agree that the proposed NPMS must specify the extent to which Crown, the dairy industry, the beef industry, the deer industry and regions exacerbate and/or benefit from the proposed NPMS and specify a rationale for the allocation of costs. DFA further supports DINZ's view that an adequate rationale for the allocation of costs is particularly important between the dairy, beef and deer industries.
- 4 **NZDFA agrees with the DINZ** position that Farm Gate Revenues be used to determine the extent to which industry contributor's benefit from the proposed NPMS and as a rationale for the allocation of costs. An allocation based on Farm Gate Returns reflects where industry benefits (trade risk mitigation and production) of the proposed NPMS will accrue. Applying funding shares based on the current strategy (which themselves were arbitrary) have no basis for determining the extent to which industry contributors will benefit from the proposed NPMS and provide no rationale for the allocation of costs.

The Martin Jenkins' Report argues that the rational approach under a principle based approach to determining funding allocations to disease control funding would be to nationalise disease control costs and allocate them among industries using the same methodology as indivisible costs. This would mean that production benefits would be shared fairly among industries and individual regions. NZDFA sees logic in this approach, but also notes that there would be challenges.

The deer industry currently prefers that individual deer farmers manage their own testing costs whereas the beef and dairy industries have testing requirements under industry-wide contracts and are paid as part of their levies/industry contributions to the AHB.

A change to nationalised funding would be a significant change for the deer industry, and would need to be debated among the deer industry to understand what the practical implications would be. For example, by employing their own tester, a farmer can arrange for that person to do other jobs on the same visit. Also, nationalised funding may subsidise less efficient producers. If a Board of Inquiry is called, the deer industry would use the intervening time to establish its position on nationalising disease control costs and the NZDFA is fully supportive of the need to consider this aspect.

The NZDFA thanks the Minister for the opportunity to submit on this important proposal, reaffirms its support for the DINZ position and the Martin Jenkins report and would appreciate an opportunity to be heard in support of our own submission should there be a Ministerial call for a Board of Inquiry on the amendment to the NPMS.

ATTACHMENTS APPENDIX 1: Martin Jenkins Report.

**FOR AND ON BEHALF OF
THE NEW ZEALAND DEER FARMERS' ASSOCIATION**

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Dated: 30th November, 2009.

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