

Submission Form

Please feel free to write on or photocopy this form.
We have drawn it up as a guide - you do not have to use this format.

Name of person/organisation making the submission	Deer Industry New Zealand		
Contact person	Dr Lindsay Fung (Science Manager)		
Contact address	PO Box 10702, Wellington		
Phone	04 471 6116	Fax	04 472 5549
E-mail	lindsay.fung@deernz.org		

This submission is about - HRE05002
Application number: _____

Application by Animal Health Board and Department of Conservation **(applicant name)**
to Reassessment of sodium fluoroacetate (1080) and substances containing 1080 (a vertebrate toxin). **(application purpose)**

Reason for submission (attach supporting information) _____
Please refer to attached information: "Submission by Deer Industry New Zealand on the application by the Animal Health Board and Department of Conservation for the reassessment of 1080."

What decision do you seek (optional) _____
To continue the current approval for 1080 and substances containing 1080, pursuant to section 63 of the HSNO Act 1996 for the control of possums, wallabies and rabbits, and for targeted by-kill of rodents and mustelids.

Do you wish to be heard in support of your submission?¹ **Yes** **No**
(at a public hearing)

Post to: ERMA New Zealand
P O Box 131, Wellington

Fax to: ERMA New Zealand
(04) 473-8433

¹ Please note that if any submitter indicates they wish to be heard, the Authority is obliged to hold a public hearing.



Andrea Eng
ERMA New Zealand
P O Box 131
WELLINGTON

SUBMISSION BY DEER INDUSTRY NEW ZEALAND IN SUPPORT OF THE APPLICATION BY THE ANIMAL HEALTH BOARD AND DEPARTMENT OF CONSERVATION FOR THE REASSESSMENT OF 1080 (HRE05002)

Deer Industry New Zealand (DINZ) supports the above application by the Animal Health Board (AHB) and Department of Conservation.

DINZ is the levy funded industry-good body established under the Deer Industry New Zealand Regulations (2004). Levies are collected on the products of deer, velvet antler and venison. Venison levies are collected on a 50:50 share basis between the venison processor export sector and *ca.* 4000 currently active deer farmers. DINZ invests levies provided by farmers and processors according to functions outlined in the Regulations including promoting and assisting development of the deer industry in New Zealand.

A specified component of levies collected is allocated for the control of bovine tuberculosis (Tb) or for other animal health purposes. DINZ therefore has a *significant stake* in the continued use of 1080 as a pivotal tool for control of bovine Tb vectors (possums and mustelids).

Rationale for Submission

The New Zealand deer industry (farmed deer) exports approximately 95% of farmed venison. In the year ending September 2006 this amounted to over \$250 million in export earnings. The industry, along with other pastoral sector meat industries (beef and lamb), therefore relies heavily on being able to access overseas markets: High incidence of bovine Tb (to which deer are highly susceptible) is a major threat to market access.

- The use of 1080 as a principal tool to control Tb vectors under the bovine Tb National Pest Management Strategy (NPMS) has been highly successful over time: As at June 2006 there were only 31 Tb-infected deer herds compared with a peak of 167 in 1996 when the NPMS was initiated.

However New Zealand cannot slow efforts to eradicate bovine Tb: history shows that if vector control is prematurely slowed or stopped, vectors re-populate quickly. Further, while progress has been made in disease control, the vector risk area remains large (and hence ongoing risk of re-infection) and requires an acceleration in vector control, not a deceleration.

- In addition to market access, a high incidence of bovine Tb in deer herds also impacts on animal productivity, so control will also minimise production losses from poor animal health.
- Continued use of 1080 will therefore allow the NPMS to build upon the gains that it has made to date (subject to continued funding) and achieve its target of official freedom from bovine Tb (less than 0.2% infected herds) by 2013. As there are no other cost-effective alternatives

PO Box 10-702, Level 13, PWC Tower, 113 The Terrace, Wellington, New Zealand

Telephone +64-4 473 4500, Fax +64 4 472 5549

www.deernz.org

www.nzvenison.com

www.velvet.org.nz

Deer Industry New Zealand is the operating name of the Game Industry Board.



readily available, discontinuing the use of 1080 will conversely negate these gains as Tb vector populations expand and increase, resulting in re-infection of bovine Tb to deer and cattle herds.

- DINZ supports the use of 1080 as the “principal technology” available to control bovine Tb vectors and believes that the extensive scientific research into its use, efficacy and environmental impacts demonstrate clear and significant benefits to the pastoral sector, the native conservation estate and to environmental sustainability (such as erosion control and water quality) and correspondingly minimal adverse impacts to native ecosystems.
- DINZ is also fully supportive of a comprehensive research portfolio that is examining alternative technologies to control bovine Tb vectors, funded through a variety of sources including the AHB and central government via the Foundation for Research, Science and Technology. However the realistic time frame for any of these technologies to be implemented at a practical scale necessitates the continued use of 1080.
- The use of 1080 has received, and will continue to receive, a high profile as its use is a direct intervention into natural environments and as a toxic agent it has severe impacts on valued non-target species (*e.g.* dogs, livestock). This has resulted in comprehensive monitoring of effects and rigorous controls for its use in addition to the research referred to above; the monitoring and control measures are therefore well-tested and are necessary to provide a sound basis for determining overall benefits versus non-benefits from using 1080.
- DINZ supports the continued use of 1080 principally to ensure industry productivity, deer health and market access, however it must be stressed that deer farmers are very much involved in other aspects where 1080 plays an important role – namely in maintaining on-farm native biodiversity and wider environmental sustainability (soil conservation and minimising off-farm impacts on water quality). Reduction in invertebrate pests that threaten native ecosystems, riparian or soil conservation plantings and contribute to faecal contamination in waterways is therefore consistent with the aims of many New Zealand deer farmers.
- This application represents a ‘unique’ situation where three broad societal goals will benefit from control of possums and other introduced mammalian ‘pests’:
 - Protection/enhancement of native biodiversity (functioning native ecosystems)
 - Maintained economic productivity (primary sector and tourism)
 - Increased environmental sustainability (soil conservation and water quality)

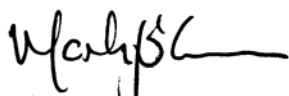
That two statutory bodies with different aims, along with many other agencies (including DINZ) that also have differing priorities, support control of possums through the use of 1080 indicates a high degree of cross-sector/issue consensus and dialogue.



DINZ is available for further comment if required. Enquiries in the first instance should be directed to Lindsay Fung (Science Manager) – contact details as given above.

In conclusion Deer Industry New Zealand supports the application by the Animal Health Board and Department of Conservation for the reassessment of 1080 (HRE05002) and wishes to see continued momentum in the goal of eliminating bovine Tb from New Zealand deer and cattle herds.

On behalf of Deer Industry New Zealand



Mark O'Connor
Chief Executive Officer