

SUBMISSION TO
THE NATIONAL BOVINE TB PLAN REVIEW
SECRETARIAT

on

***TB Plan Review – Proposal for
Consultation
September 2025***

From The New Zealand Deer Farmers'
Association



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1. Introduction

- 1.1 The New Zealand Deer Farmers' Association (NZDFA) welcomes the opportunity to make on TB Plan Review – Proposal for Consultation.
- 1.2 New Zealand is the world's largest producer of farmed deer. The main products marketed from deer are venison and deer antler velvet and approximately 95% of products are exported. Based on data gathered by Stats NZ, in the year ending September 2024, deer products (excluding skins and petfood) were worth \$332 million in export receipts to New Zealand; the national herd was estimated at 709,000 deer.
- 1.3 The NZDFA is a voluntary subscription-based Incorporated Society (established in 1975) and acts as an industry-good body to represent the interests of New Zealand deer farmers, families and staff and to promote and assist the development of the deer farming industry in New Zealand. It also appoints four of the eight members of the board of Deer Industry New Zealand, a shareholder of OSPRI.
- 1.4 The NZDFA has over 1000 members representing all deer farmers. It is nationally represented by a four-person Executive Committee and regionally through 16 branches as well as special interest groups.
- 1.5 The industry is the youngest pastoral-based industry in New Zealand (the first deer farm licence was issued in 1970) but provides diversified markets and additional revenue to and complementary land use with other pastoral farming industries. Indeed about 80% of deer farmers also farm other livestock species and/or arable crops.

2. General Feedback

NZDFA:

- 2.1 Fully supports the aim of eradicating TB from herds *and* possums and considers the preferred option in the consultation document (prioritising eliminating TB from the possum population) is the most cost-effective approach.
- 2.2 Notes that the wild introduced animal population has dramatically increased over recent years and this in turn greatly increases the risk of farmed livestock being exposed to TB as these wild animals encroach on to farmland.
- 2.3 Also supports the proposed milestone of achieving freedom in possums and livestock by 2040 but is very aware of the need to resolve some issues which have contributed to not achieving freedom in livestock by 2026. These concerns are covered in Section 3 below.
- 2.4 Agrees that funding should be reviewed within five years and in particular consider funding contributions that could be sought from owners of land that harbour possums and other carriers of TB.

3. Specific Concerns

Timely access to land for vector control

- 3.1 While NZDFA supports the prioritisation of eliminating TB from the possum population, we note that a significant compromising factor for effective and timely control of possums over recent years has been gaining access to land where these populations are located. For any future efforts to be successful NZDFA considers access for vector control to be a major focus and high priority. Unless this is resolved it places neighbouring businesses under extreme risk and financial burden if herds become infected despite those business owners' best efforts.
- 3.2 To this end while the collaborative approach based on a good relationship represents an ideal circumstance to gain access for vector control, NZDFA urges that where this is not the case, Biosecurity Act provisions for access should be utilised so that timely and cost-effective control is carried out.

Competent TB testing for deer

- 3.3 A key component for eradicating TB from herds is timely and competent TB testing. NZDFA members have advised that herd testing has not been carried out in a number of herds for some time and further exacerbating the situation is the lack of TB testers with the experience or knowledge to properly test farmed deer for TB. Failure to address this issue will greatly undermine other efforts to eradicate TB as well as subject deer farmers to unnecessary delays and costs.
- 3.4 NZDFA regard this as an area major concern and are willing to discuss with OSPRI how the NZDFA may assist in upskilling of TB testers in familiarity and handling of deer. In this respect our 16 branches are best positioned to provide practical and supportive advice to TB testers who have little or no experience/confidence with deer.

Compensation for farmers within breakdown areas

- 3.5 Suitable support and compensation for farmers with infected status herds should be provided. This includes assistance with developing an "Infected Herd Management Plan" created by the case manager, that provides a pathway to move to a "C" status as quickly as practicable.
- 3.6 Furthermore, there needs to be a meaningful discussion or clarification on compensation for herds if the property needs to be depopulated. As the numbers of infected herds reduces this may be the best option to eradicate TB out of the farmed deer.

Improved meaningful engagement with local TB Free Committees

- 3.7 Many of our branches have representatives on local TB Free Committees. NZDFA regard these committees as important sources of local information and expertise that can both inform OSPRI of local issues as well as develop good relationships within the local community allowing better collaboration in TB control efforts. It is therefore disappointing that many of these local committees feel disenfranchised and disconnected from OSPRI.
- 3.8 NZDFA urges that the implementation of the (new) TB Plan place a high priority on improved and meaningful engagement with TB Free Committees

TB testing at slaughter

- 3.9 In conjunction with the lack of experience and skill for herd testing of deer, NZDFA also raises concerns with similar issues that may well arise at deer slaughter premises (DSP). In particular with the reduction in prevalence of TB in deer presented for slaughter, veterinarians may subsequently have no familiarity with visual identification of TB lesions.
- 3.10 Without an improved testing regime at both the herd and DSP levels problems could develop in a few years' time. NZDFA requests clear and aligned messaging with the deer industry around TB testing and how it is currently being managed.

Herd status classification

- 3.11 NZDFA supports in principle a simpler classification but does not see this as a significant step to achieve the aim of eradication. Our concerns are as follows:
- The current system has been in place since the inception of the TB programme and it works. Farmers understand it and realise there is risk associated with buying from low TB status herds or CM herds.
 - If the classification is changed it would likely result in the need to change the ASD books again. This would seem like an unnecessary diversion of focus and resources and based on the recent change to the forms (which was poorly implemented).
 - The current herd status classification has worked for the last 48 years - if the aim is for eradication by 2040, changing the system for another 14 years is not an efficient use of resources.
- 3.12 NZDFA therefore are **not in favour of the proposed classification system**, but suggest that, with reduced/targeted testing, the Clear status should be increased by one every year regardless of if a herd has been tested or not, so it reflects the number of years the herd has been clear rather than the number of clear tests the herd has had.

4. Summary

- 4.1 NZDFA generally supports the intent of the TB Plan Review proposal and proposes some specific actions and areas of focus that will assist in achieving the aim of TB eradication in both livestock and possums by 2040.
- 4.2 For the plan to be successful:
- Access to land for vector control is essential. The Biosecurity Act provisions should be used as required.
 - NZDFA is willing to assist in upskilling TB testers in working with farmed deer.
 - Improved and meaningful engagement with local TB Free Committees is required.
 - Suitable support and compensation for farmers within breakdown areas should be provided. Including a plan to quickly reduce the risk status from the farm.
 - Have improved testing/detection regimes at both the herd and DSP levels.
- 4.3 NZDFA would be happy to discuss this submission and any associated farmer observations with OSPRI.