

# Analysis of Submissions

National Bovine Tuberculosis Pest Management  
Strategy: An Amendment Proposal Prepared by the  
Animal Health Board Incorporated

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# Introduction

The National Bovine Tuberculosis Pest Management Strategy (the Strategy) is an \$82 million per year programme that involves measures to control bovine tuberculosis (Tb) in cattle and deer herds, and in the populations of wild animals that also harbour the disease. The main purpose of the Strategy is to protect exports of beef, dairy and deer products from negative consumer perceptions that may arise if Tb was seen to be poorly controlled in New Zealand. The Strategy also reduces production losses for cattle and deer farmers, and produces incidental benefits to biodiversity.

The Crown currently contributes \$30 million per year to the costs of the Strategy, with the balance being funded by the cattle and deer industries and regional councils. The Strategy is implemented by the Animal Health Board.

In September 2009, the Animal Health Board (AHB) and the Ministry of Agriculture and Forestry (MAF) invited submissions on the to the *National Bovine Tuberculosis Pest Management Strategy: Amendment Proposal*. This document summarises the submissions relevant to the Strategy.

*The National Bovine Tuberculosis Pest Management Strategy: Amendment Proposal* has been prepared by AHB to amend and extend the duration (2013-2025) of the Strategy.

The AHB has prepared this proposal for a review of the Strategy to be conducted in accordance with the requirements of Section 88 (6) of the Biosecurity Act 1993.

This paper summarises the submissions received on the *National Bovine Tuberculosis Pest Management Strategy: Amendment Proposal* prepared by the Animal Health Board (AHB). The amendment proposal was released in September 2009.

Every attempt has been made to provide a clear summary of the feedback received, although not every comment is reflected in this report. Where submitters have commented specifically on sections of the proposal document, this has been noted, although some comments are more general in nature.

MAF received 97 submissions on the amendment proposal that included submissions from industry groups, stakeholder partnerships, science and research institutes, regional and territorial local authorities, academics, and other interested parties such as farmers and individuals.

# The Amendment Proposal

The Amendment proposal proposes significant changes in approach to the management of bovine tuberculosis (Tb), including objectives to improve the concept of eradication of Tb from wildlife across a range of vector habitats, with a consequent reduction in the extent of Tb Vector Risk Areas.

The proposed Strategy is based on the following key changes:

- Prevent expansion of existing Vector Risk Areas.
- Target approximately 25 percent of the existing total extent of Vector Risk Areas for eradication of Tb and, in so doing, test out ability to achieve total eradication of Tb from wildlife and from cattle and deer herds in a variety of habitats.
- Keep infected herd numbers at a level which avoids significant production losses and protects the quality image of New Zealand's beef, dairy and deer products.
- Make improvements in the cost-effectiveness of possum control.
- Introduce some changes to herd testing and movement control policies to reduce the risk of herd-to herd transmission, and over time to reduce the need for herd Tb testing in areas of low disease risk. These would include:
  - additional controls on the movement of cattle from infected herds;
  - requirements to tag and post-movement test cattle or deer being moved from herds in some higher Tb risk areas within current movement control areas.

Testing and movement control policy changes would be phased in two years after the amended Strategy is introduced.

The Strategy would have an initial term of 15 years (to 2024/25) subject to five-yearly review, including a review of the Strategy's funding arrangements. Initially, it is proposed to maintain existing funding at \$82 million per annum with a continuation of current funding arrangements and shares. Funding is from the beef, cattle and deer industries as well as local and central government.

Figure 1: Submissions received by Submitter Category

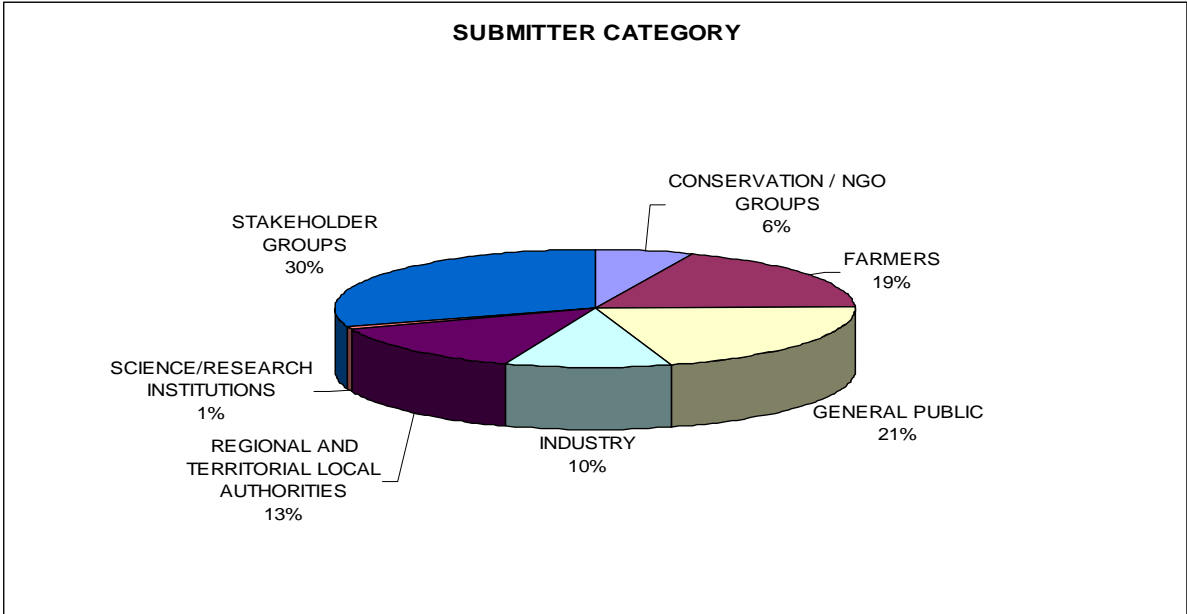
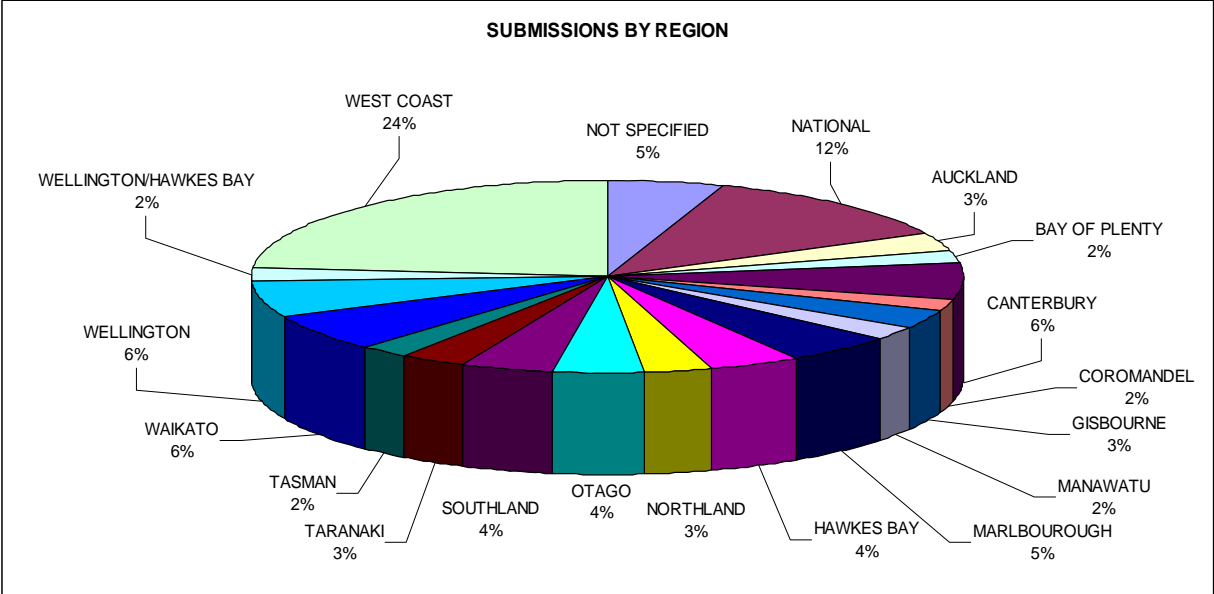


Figure 2: Submissions received by Submitter Region



## Submitter details

Name	Title	Organisation
Eric & Betty Terzaghi		
Reihana Robinson		
Leith Chick	Chairman	Tbfree Waikato
Trevor Freeman		Gisborne District Council
Earle Wells	Chairman	Tbfree Bay of Plenty
Teresa Brown		
Keith Kelly	Chair	Tbfree Auckland
Tony Orman		
Dennis Mitchell	Chairman	Hawke's Bay Tb Free Committee
The MAFIA (Many Affected Friends in Aotearoa)		
Ron and Jackie Monk		
Hayden Kendrick		KNK Ltd
Andrew & Niki Mirfin		Gunsight Farms Ltd
Debra Magner		Cranley Farms Ltd
Lindsay Molloy		
Mary E Molloy		
Glen & Linda Robinson		
Peter Crouchley		
Helen Lash	Chairman	Tbfree West Coast
Hugh Rose	Chairperson Kaipara Branch	Farmers of New Zealand Inc
Nolan Farm		
Roy Bensemman	Chair	Tbfree Tasman
Murray Dench		Dairy Plant Design Service
Patrick Krippner	Transmission Support Technician	Alcatel-Lucent
Ryder (no first name supplied)		
Helen Hyde		
John Somerville		

Hamish Cave	Chairman	Gisborne Branch Federated Farmers
Dennis Bush-King	Environment & Planning Manager	Tasman District Council
Ross Scarlett	Chairman	West Coast Regional Council
Randal Beal	VCS Manager	
Rod Quin	Chief Executive Officer	Westland Milk Products
Campbell Leckie	Biosecurity Manager	Hawke's Bay Regional Council
Neil MacMillan	Chairman	Tbfree Northland
Roger Beck	Chairman	Manawatu Wanganui TB free Committee
Fran Wilde	Chair	Greater Wellington Regional Council
Richard Bowman	Biosecurity Manager	Environment Southland
Peter Benfell	General Manager - Agriculture & Environment	AgResearch Ltd
Chris Bowron	Chairman	Tbfree Marlborough
Rob McGregor		
Kerry Straight		
Fred Ruesink		
Kevin Mitchell	Chairman	Federated Farmers Hawkes Bay
N W Stewart		
W F Benfield		
Gordon George		New Zealand Deerstalkers Association
Donald McIntyre	Chairman	Taranaki TB Free Committee
Mark C Farnsworth	Chairman	Northland Regional Council
Peter Buckley	Chairman	Environment Waikato
Graeme Taylor	Chairman, Environmental Committee	Marlborough District Council
Kees van Beek		West Coast Federated Farmers
Paddy Boyd		Tbfree South Canterbury Working Group & Local farmers
Dr Leigh A L Corner	Veterinary Epidemiologist	
Graham Sperry		NZ Wildlands Biodiversity Management Society Inc
Mike O'Brien	Chairman	Tbfree Southland Committee
Stephen Korteweg	Chairman	Tbfree Otago Committee
Peter Gaskin	Chairman	Wellington TB free Committee
John Clayton		

Dianne Brown	CEO	New Zealand Deerstalkers' Association Inc
Shaun Haraki		
Don Ross	Chairperson	New Zealand Conservation Authority
Stew Wadey		President of Waikato Federated Farmers
Helen Algar	Chair	Wellington Hawke's Bay Conservation Board
David W Hodder		
Alec Neill	Chairman	Environment Canterbury
Fiona Hutchinson	Senior Policy Analyst	DairyNZ
Kimberly Crewther	Manager, Sustainable Dairying Strategy	Milk Supply, Fonterra Co-operative Group Ltd
Murray & Anita Stewart		
Hugh Barr	Secretary	Council of Outdoor Recreation Associations of NZ
Theodora Ward		
Hoani Langsbury	Chairman	Otago Conservation Board
Rob McGregor		North Taranaki Deerstalkers Branch
Robert Port		
Mark O'Connor	CEO	Deer Industry New Zealand
Tony Pearse		New Zealand Deer Farmers' Association
Shirley Hudson		
RD & EA Neeley		
John J O'Connor		
Steve Walker		
Steffan Browning	Spokesperson	Soil & Health Association of NZ
Judy Arnold		
Sandra Faulkner	Chairwoman	Gisborne TB free Committee
Paul Harris		
Ariana Hemara-Wahanui	Technical Policy Analyst	Meat & Wool New Zealand Ltd
Peter McDonnell		
Malcolm Gilbert	Chairman	Canterbury Deer Farmers Association
Malcolm Gilbert	Chairman	Tbfree Canterbury
Jamie Cleine		Utopia Farms Ltd
Garrick Murfitt	Chairman	Horizons Regional Council

Lloyd Hanson		
Kelly Martyn	Regional Policy Advisor	Federated Farmers of New Zealand
Kevin Cresswell		Meat Industry Association of New Zealand
Paul Berry		
John Veysey		
Wayne Scott	Director Corporate Services	Otago Regional Council
B G Chamberlain	Chief Executive	Taranaki Regional Council

## Submitters View of Amendment proposal

Out of a total of 97 submissions received, each submission expressed an overall preference or view of the Strategy, this has been divided into 6 primary themes which are displayed in the table below.

Not Specified	1
Opposed amendment proposal	13
Opposed amendment proposal due to use of 1080	13
Overall support with conditions	48
Status quo	13
Support amendment proposal	9
<hr/>	
	97

One submitter did not provide a preference. The submitter did, however, raise concerns that the proposed program will not achieve its objectives. This opinion is associated with the program for livestock and vectors and fall into the following areas of bovine tuberculosis – epidemiology, control of vectors, the risks of moving livestock from infected herds, management of the program and research.

Twenty-six submissions opposed the Strategy. Of these, 13 of the submitters expressed concern regarding the use of the vertebrate toxic agent ((VTA) sodium fluoroacetate compound 1080) other comments received about 1080 included:

- 1080 is not working as far as eliminating Tb is concerned and is economically unfeasible;
- New Zealand uses 80 percent of the world supply of 1080 for eradication and a threat to New Zealand’s overseas markets;
- Aerial poison (particularly 1080) is a major threat to the environment especially “New Zealand’s clean green image”, and kills far more than the target species. It is “imbibed” into cellulose – leaf litter, bark, leaves and plants, trees & grasses. It is inhumane and has no antidote.
- The aerial distribution of 1080 is erratic and arbitrarily dispersed into various areas, more emphasis should be placed on ground baiting which would reduce that amount of indiscriminate killings of other species, although approximately 10-20 percent more expensive it is more target directed which should reduce by kill dramatically.
- The current Strategy seems to focus almost entirely on aerial and other eradication of all listed wildlife pest animals, and is fundamentally incorrect.

The remaining thirteen submissions that opposed the Strategy included the following comments:

- The Strategy lacks robust scientific facts and clarification of practicability.
- The priorities of the Strategy focus too much on possums rather than other feral animals and there are not enough efforts on improved stock movement control and awareness of disease transmission.
- The Strategy needs to be refocused on Tb responses.
- Infected herds have been caused mainly because of movements of infected livestock based on erroneous results of skin tests, which may only be 90 percent accurate in some cases.
- The Strategy is too costly and there is a large area of uncertainty around achieving the proposed objectives.

- Priority needs be set around providing farmers with educational support on the importance and fundamentals of Tb eradication.
- The Animal Health Board should review its information delivery and movement control strategies. Movement Controls have contributed greatly to reversing the percentage of infected farms. The on-farm and movement control work should be a priority which is not reflected in this proposed Strategy.
- Expressed resistances to the Strategy however the majority of comments that did not align with the purpose of the consultation and were individual views that were out of scope of the Strategy.

Thirteen submitters would like to see the status quo remain. Some of the general comments were:

- That the emphasis in the amendment proposal on eradication will mean that other areas with high vector risk will “lose out”.
- Concern with the funding drop proposed in the amendment to the new Strategy to areas that need special attention with its higher rate of infected herds.
- One submitter states that until proven alternatives for possum control are developed, the status quo should remain.

Forty-eight of the submitters generally supported the objectives/aims/intent of the proposed strategy however, many have suggested alternative approaches or conditions be applied to some areas of the Strategy. These are identified in the various sections of this analysis. Submitters also made other positive comments in relation to the progress under the current strategy, thoroughness on consultation, formulation, research and development of the Strategy.

Five submitters support the need for an ongoing Vector control/principle of eradication or national management of bovine Tb in New Zealand and do not necessary express support for the proposed Strategy. These submitters also made comments in relation to the following:

- A national strategy should be delivered evenly across New Zealand and not selectively allowing the problem to worsen in some locations.
- The proposal could potentially result in less vector control expenditure in the some regions slowing down the rate at which current vector risk areas are declared Tb free.

# Strategy Comments

## SECTION 2: INTRODUCTION, PROPOSED AMENDMENTS AND KEY POINTS

One submitter provided their support on the following key points of the proposal:

- Preventing expansion of the existing Vector Risk Areas (VRAs).
- Proving the concept of eradication in a variety of habitats.
- Keeping infected herd numbers at a level that maintains market access and avoids significant production losses.
- Improving the cost-effectiveness of possum control.
- Having an initial term of 15 years, subject to five-yearly reviews.
- Maintaining the existing level of funding and level of contributions.
- Maintain the ongoing investment into applied research and development.

One submitter suggested that consideration should be given to the extent of area proposed (25 percent VRA) to determine the proof of concept. The submitter suggests that from a technical perspective eradication of the disease is more achievable in certain environments particularly within more open habitats where ground control techniques can be deployed (i.e. dry land east coast South Island) versus the intractable dense canopy of forest where severe climatic conditions and accessibility mean that aerial treatments are the only options. Eradication trials to test the concept should also be targeted to these particular areas as a priority.

One submitter provided their support in relation to the proposed Strategy core aims of preventing expansion of existing Vector Risk Areas which. The submitter believes that this proposal will test New Zealand's ability to eradicate bovine Tb while keeping infected herd numbers at a level to avoid significant production losses and protect the quality image of New Zealand's beef, dairy and deer products.

### MAF Comment

It is important to note that the review relates to the Strategy itself, which takes the form of an Order in Council – the Biosecurity (National Bovine Tuberculosis Pest Management Strategy) Order 1998. A number of issues commented on by submitters concern operational measures (e.g. the proposed Special Movement Control Areas). These can be addressed separately by the Animal Health Board in implementing the Strategy, outside of the Strategy review process. MAF will ensure that the AHB notes these concerns.

## SECTION 3: PROPOSAL DEVELOPMENT AND CONSULTATION

Three submitters commented on this section.

Two submissions from the West Coast Federated Farmers were received and both concerned that there will be no progress on the West Coast with the proposed Strategy while significant progress in other regions.

One submitter thought that the consultation process prevented all taxpaying and rate-paying New Zealanders from having proper input when preparing the amendment proposal.

## **SECTION 4: THE PROPOSER OF THE STRATEGY**

No submissions were received on this section.

## **SECTION 5: ORGANISM TO WHICH THE STRATEGY APPLIES AND OTHER ORGANISMS TO BE CONTROLLED**

### **5.1 Pest agents that will be subject to disease control measures**

One submitter supports the disease control measures, in particular the identification of cattle and deer to place of origin and assignment of a Tb status to cattle and deer. (section 9.2)

### **5.2 Pest agents that will be subject to vector control measures**

One submission encourages the continued involvement of the AHB as a partner in this joint agency response to eliminate wild deer and further suggest that the model be highlighted in the Strategy with particular reference made to the importance of maintaining this approach in Tb free regions such as Northland.

## **SECTION 6 – THE PEST MANAGEMENT AGENCY**

One submitter provided comments supporting AHB to continue to be the management agency responsible for implementation.

### **6.1 Accountabilities**

No submissions were received on this section.

### **6.2 Implementation of the Strategy**

No submissions were received on this section.

### **Regional TBfree committees**

New Zealand Deer Farmers Association commits its ongoing support for the Tb free committee regional bodies and deer farming representation on that. The submissions noted that support has clear regional strength in the areas where disease is some what entrenched. 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 the planning and communication associated with the Strategy. Ongoing engagement with these stakeholders will be increasingly important areas of the proposed Strategy.

## **SECTION 7 – DURATION OF THE PROPOSED STRATEGY**

No submissions were received on this section.

## SECTION 8 – STRATEGY OBJECTIVES

Nineteen submissions have expressed their overall support for the strategy objectives.

Two submitters who opposed the overall strategy objectives include the following comments:

- The proposed objectives could potentially result in less vector control expenditure in the (West Coast) region for many years slowing down the rate at which current vector risk areas are declared Tb free.
- One contributor expressed concern with the new Strategy proposals as it did not touch on what is likely to happen to bovine Tb control beyond 2025. The feasibility of eradication of the disease from New Zealand using existing control procedures has not been adequately demonstrated; the new Strategy’s simplicity acknowledges this because validation of these procedures is provided as a primary objective.

### MAF Comment

Vector control expenditure in areas of higher risk will not necessarily be fixed. Operational and budgetary flexibility will be available to the AHB in operating the Strategy, to deal with changing circumstances.

The Strategy will continue to be reviewed at least every five years, in accordance with the Biosecurity Act. Measuring progress towards the objectives will be an important part of the review process.

### 8.1 Primary objectives

*Establish feasibility of eradication of endemic Tb from wildlife populations across a representative range of New Zealand terrains.*

Nine submissions specifically comment on their support for the proposed primary objectives to eradicate Tb from wild animal populations in Vector Risk Areas, maintain the low national animal Tb infected herd annual period prevalence rate and to prevent the establishment of Tb in possum populations in Vector Free Areas.

One submitter suggested that AHB provide clear, simple metrics to report on the proposed Strategy outcomes.

One submitter commented that the support for the primary objective is dependent on a positive outcome from the eradication trials in the two extensive forest areas nominated.

One submitter states that the new objectives are appropriate for evolving the bovine Tb situation in New Zealand – however there are serious deficiencies in the new programme as it has been presented in the proposal and if not attended to may interfere with the ability of the AHB to achieve its objectives, such as objective b. The submitters comments were the following:

- There are no reports on the level of residual risk in areas under vector control, simply describing all areas where infected possums have been found under the “Vector Risk Areas” does not paint an accurate picture. Therefore to demonstrate progress towards achieving the goal of Objective b. a new reporting scheme for VRAs and vector control will be required which has a method of assessing the residual risk of infection in vectors over defined areas of land (farm and non-agriculture land). In the current scheme low risk

herds (C10) can move from high vector risk areas without the vector component along with the disease control managers and buyers of livestock.

#### Other

Four submitters suggested that the current primary and secondary objectives approach be revised to dual objectives.

#### MAF Comment

MAF notes these views.

### 8.2 Secondary objectives

#### *Support*

Five contributors expressed their support regarding the secondary objective of maintaining Tb infected herd prevalence at a level which avoids significant adverse impacts on the livestock industries involved (and at no greater than 0.4 percent). However they also further recommend that there is a secondary objective to make further and significant cost savings during the duration of the Strategy.

Ten submitters suggest that if the outcome of the new objective is not favourable then it is recommended to return to an infected herd based Strategy objective of 0.2 percent period prevalence.

#### *Oppose*

Ten Submitters do not support permitting the secondary objective, the infected herd prevalence of the Strategy to increase to 0.4 percent and submit that the secondary objective should remain unchanged at 0.2 percent. The relaxing of the Tb prevalence target will impact on the quality and level of service in critical areas.

- One submitter suggests that there should be an increase in funding so as to be able to retain the 0.2 percent target.

#### MAF Comment

The AHB has updated its projections for the prevalence rate of infected herds. The current Strategy sets a national average of 0.2 percent. The latest modelling shows that even at the projected upper limit, the level is unlikely to hit 0.4 percent. The AHB is providing stakeholders with more detailed projections of the likely trends in the number of infected herds in different regions, in contrast to the national average figure, to enable submitters to reconsider its acceptability.

### 8.3 Definitions

One submitter provided support in relation to the “Proof of freedom” concept that will occur in suitable areas to determine if it is technically feasible to eradicate Tb from wild animal populations. The submitter also notes that a possible research activity should be funded on a national basis and not through the regional share.

One submitter has suggested that the principles and definitions of *buffer zones* and *Vector Risk Areas* be reviewed. The submitter believes that tangible boundary reduction and relief for deer farmers in certain areas is warranted, especially for closed herds with high slaughter

surveillance annually from young stock and a proportion of older capital herd animals and also wishes to see a greater role for monitoring in buffer zone herds.

#### **MAF Comment**

MAF notes the views expressed, and considers that these are operational disease management measures that can be reviewed and addressed outside of the terms of the Strategy review.

### **9 Disease Control**

Six submitters provided comments on this section.

Two submitters agree that changes are needed to the current disease control measures to further reduce the risk of Tb being transferred from herd to herd. Stakeholder collaboration and new technologies should be more fully levered to increase transparency of animal movement related risks and promote timely identification of herd-to-herd transfer.

One submitter supports the proposed changes to the disease control measures and comments that they are the most appropriate measures to target and manage the risk associated with movement of infected livestock. The submitter also provided support in relation to the costs of implementing the new disease control measures which they consider should be offset by reducing testing costs in Surveillance Areas. The submitter also comments that stakeholder collaboration and new technologies should be more fully levered to increase transparency of animal movement related risks and promote timely identification of herd-to-herd transfer.

Two submissions both supported the disease control component of the proposed Strategy to ensure that deliberate or careless action does not lead to an increased risk of Tb. They note that measures for disease control purposes including effective permanent animal ID should be pursued to provide for a diligent and cost effective manner through the various regions.

One contributor has requested consideration of ways to lower disease control testing frequency and costs and submits that a principle based approach should be used to determine a fair allocation of disease control costs between industries. The submitter also mentions that the deer industry will require an opportunity to debate the merits of moving to a collective approach to disease testing.

#### **MAF Comment**

MAF notes the views above, and would comment that these are operational measures that can be addressed outside the terms of the strategy review.

#### **9.1. Classification of animals**

Three submitters consider that farm infection and risk status information should be made more visible. The submissions raise the lack of classification of farm or land 'risk status' within VRAs as opposed to herd status, nor does it provide whether the granularity is required to assess vector control progress or allow farmers/graziers to easily differentiate between low, medium and high risk farms within VRA. They recommend that a new classification of ' farm risk status' be introduced in addition to the herd classification. They also note that within VRA this should reflect the vector status of the properties at least at a level of classification of

low medium or high risk and also possibly reflect the number of year's control occurring on the areas.

#### MAF Comment

Classification of animals and risk status is an operational issue outside the terms of the strategy review.

### 9.2 Animal Identification

Seventeen submissions were received on this section.

The seventeen submitters expressed their support in relation to the proposal for permanent identification of both cattle and deer to assist with the traceability of animal movements and the epidemiology of managing and controlling tuberculosis. Submitters also made other comments in relation to animal identification:

- Current tagging requirements should be immediately modified to require all animals born in the future to be identified to their property of birth.
- The current provision, that does not require tagging for animals of less than 30 days, is considered technically unjustifiable from a disease management perspective.
- Many of the submitters supported the National Animal Identification (NAIT) system and would like to see linked to this amendment.

#### MAF Comment

The recently approved National Animal Identification and Tracing (NAIT) project looks able to provide benefits to the operation of the Strategy. It is expected that linkages can be established between the two, to provide the Strategy with better information in:

- risk profiling in herd to herd movement;
- risk profiling in movement to high risk areas;
- tracing herd disease breakdown investigations; and
- data from slaughter premises and testing pre- and post-movement.

### 9.3 Herd Classification

No submissions were received on this section.

### 9.4 Herd Tb Status

Two submitters commented on this section.

One submitter believes that the current method of describing the Tb status with an index number to indicate the length of time a herd has been tested has created a false security around higher status animals that are located in a vector risk area. Farmers, in general, put great emphasis on the index number without looking at the other risk factors of animals such as where they have come from. The submitters suggest an additional symbol attached to the index which indicates whether the animal(s) are from a vector risk area or vector free area, e.g. C10VR or C10VF.

One submitter requests to improve the standard of testing to get a more accurate result compared with the current system that is being used.

## MAF Comment

MAF notes the views above. The Tb Strategy operations include a research component, which is active in seeking improvements to Tb testing.

## 9.5 Tb disease management areas and movement controls

### *9.5.1 Movement control areas*

Seventeen submissions were received on movement control areas.

#### *Special Movement control areas*

Twelve submissions support the need for the continuation of the current Movement Control Areas (MCAs) and the establishment of the Special Movement Control Areas (SMCAs).

Some submitters also made other comments in relation to the following issues:

- There is some concern that herd owners in the proposed SMCAs may be financially penalised. Consideration should be given to compensating herd owners in these areas where loss of proceeds can directly be attributed to the difficulty of marketing cattle and deer from these areas.
- One submitter is unhappy with the lack of detail in the document around how these SMCAs would be identified, how often the boundaries would be reviewed, and the number of herds throughout New Zealand that could have further restrictions imposed on their herd.
- Three submitters feel it is important to recognise that the establishment of SMCAs will require some farmers to comply with further regulatory measures and therefore disadvantage them by virtue of their location. It is suggested that increased assistance, such as site visits to explain the changes to farmers within SMCAs, be provided to ensure they do not contravene the special movement control requirements.
- Boundaries of SMCAs should be reviewed on a regular basis and implemented as part of the annual disease and vector control planning (as per the current process by AHB).
- One submitter would like to see the MCA requirements integrated with the NAIT programme as this will provide greater tracing and accuracy for the strategy, provide opportunities to reduce costs and avoid duplications between data base systems.
- One submitter does not agree with any compensation for the loss of market access in the new designated SMCA as a similar situation occurred with the introduction of MCA and farmers have since recovered

#### *Oppose*

Three submitters are concerned with the proposed amendment to the movement control policy and do not support the concept of a SMCAs because it unfairly places restrictions on properties that are designated higher risk with very little technical justification, and will have a financial impact on the farmer.

Some submitters suggest that the AHB review its movement control strategies and feel that SMCAs have contributed greatly to reversing the percentage of infected farms. They note that on-farm and movement control work should be a priority.

One submitter notes that movement controls appear to be inadequate and the proposed changes are also insufficient to address the root cause of the spread of TB. The submitters also state that the basic assumptions made in this AHB proposal is seriously flawed and the recommendations largely unsupported by the AHB arguments.

Two submitters note that farmers would be severely disadvantaged by the introduction of the Special Movement Control Area's as proposed. The submitters note that the proposal will severely limit the grazing and selling options available to herd owners on the West Coast and therefore threaten the viability to the regions cattle and deer farming. The submitters believe these areas would be extremely hard to define, could create confusion regarding compliance and create animosity between farmers either side of a line between a Special Movement Control Area.

### MAF Comment

Special Movement Control Areas (SMCAs) were proposed to set stricter controls on movements of stock from areas of higher Tb risk. There is evidence that a small number of infections in previously Tb-free areas arose from movements of stock that later proved to be infected, despite routine testing.

Further modelling by the AHB has shown that focuses of infection in areas proposed as SMCAs may in some places represent only one or two herds retaining their infected herd status over a long period of time. This review and the development of NAIT make it likely that the sources of the problem can be dealt with at the operational level, without the need to seek specific amendments to the Strategy Order.

#### *9.5.2 Special testing areas*

Eight submissions were received on this section, all of which expressed a concern with regard to the proposal for Special Testing Areas on the grounds that herd owners in these areas could be severely financially penalised. The submissions note that should SMCAs proceed then consideration should be given to compensating herd owners in these areas where loss of proceeds can directly be attributed to the difficulty with the marketing of cattle and deer. The submitters would like consideration to be given when removing restrictions so affected farms can return to normal trading.

### MAF Comment

MAF acknowledges the comments above.

#### *9.5.3 Surveillance areas*

One submitter supports the proposal for surveillance areas but believes random sample testing of 250 animals in herds with more than 250 test-eligible animals should only apply to beef or deer, leaving dairy farms exempt to whole herd on farm testing.

Two submitters provide their support for the proposed surveillance areas and suggest that that all stock in herds of over 250 also be tested, rather than only a 250 sample.

- One submitter also suggests that documentation be required to provide information on allocation of costs and benefits of testing to farmers and slaughter premises.

Seven submitters agree with the reduction of testing in the tri-annual surveillance areas. The submitters also note that AHB needs to have the ability to identify high risk herds in the

surveillance areas and be able to administer the appropriate testing in special cases. Other comments made by submitters included:

- The AHB needs to differentiate between farmers who take a risk by buying stock and farmers who run closed herds within surveillance areas. It is suggested that an appropriate testing regime should be applied to situations for incoming animals from outside surveillance areas.

One submitter does not support the proposed Strategy amendment for surveillance areas because farmers in certain surveillance areas would stand to benefit from reduced impact of testing. The submitter feels this amendment allows the possibility of infection to be present and undetected for some time in herds if slaughter surveillance is the only surveillance tool applied. The submitter has suggested that on farm testing could be reduced where herds meet an established and agreed level of compliant herd management at 3 yearly intervals. Compliant herd management would involve the farmer being able to show that a sufficient number of animals of all classes had been sent direct to slaughter with no TB detected.

One submitter supports the reduction of testing within the surveillance zones and believes that the 3 yearly testing cycles should remain as it is under the current Strategy. The submitter believes that there are communication benefits of having testers actively working within an area and subsequent awareness from all farmers where TB is still a farming issue. If there is a firm desire by the AHB and its funding stakeholders to remove surveillance testing in those areas, the submitter believes that post movement testing of any animals moving from an Movement Control Area to an Special Testing Area is an option rather than implementing the Special Movement Control Area.

#### MAF Comment

MAF notes the views above, but considers that these are operational issues. The Strategy is likely to have an improved risk profiling capability once NAIT is implemented.

#### 9.6 Herd movement control

Eleven submissions were received on this section all strongly supporting the need for tighter movement control restriction to prevent movement of infected animals. Nine of the eleven submitters also see a need for a practical and realistic exemption to be in place or financial compensation for herd owners when animals cannot be sold or relocated.

#### MAF Comment

MAF notes the views above.

##### *9.6.1 Movement from high risk herds*

Four submissions were received on this section strongly supporting the proposal to reduce movements from high risk herds. One submitter believes there should be an option to allow movement to herds of similar infected status.

#### MAF Comment

MAF notes the views above.

##### *9.6.2 Movement from infected herds*

Seventeen submissions were received on this section.

Fifteen submitters agree with increasing restrictions on movement of animals from infected herds. Additional feedback about movements from infected herds is as follows:

- Four submitters see a need for practical and realistic exemptions to be put in place for welfare and humanitarian reasons. Considerations should also be given for financial compensation for herd owners when animals cannot be sold or relocated.
- Nine submitters made comment in relation to the proposed option, only a select mob of animals are tested for movement and then retested 60 days later followed by a blood test – testing before movement would not be very practical. An option should be available where the individual animals from a mob that is clear to a skin and blood test should be allowed to travel or move to annual test zones. No movements should be allowed from high risk areas other than to slaughter.
- Three submitters mention their support regarding the permanent official ear tagging of animals from an infected herd.

One submitter does not support the permanent ID with official movement control tags of animals that are moved as this would reduced their value for the whole life of the animal and the rest of the herd. The submitter states that at present C1 and C2 status herds are harder to sell or and end up being discounted in value and “white tag stock” have very limited placement options.

One submitter provided comments relating to a need for a new way to describe the risk of infection in herds that takes into account the risk from wildlife. They note that the risk of infection in cattle and deer comes from both the disease history of the herd and the geographic area where the livestock have been held, not just in the immediate past but over their lifetime. They also note that in an area without infected vectors, a series of negative whole herd tests is assumed to indicate low or zero risk.

The submitter also provided comments regarding the movement of cattle and deer from previously infected herds to Tb free herds, with the threat decreasing with the number of whole herd tests and with time. This is the rationale for the 3 clear test and 22 month period of movement restriction. As the number of incident herds decreases the greater is the need to remove this residual threat. There is a tendency within the AHB program to see only the number of clear tests as the criterion for lowering the risk status of herds but time is also significant. The increase in the number of whole herd tests for an infected herd to become clear, but others are counterproductive, e.g. that the additional test be conducted within 14 days of the previous test. If there is believed to be a risk, then movement controls should be in place for an additional 3 months at least within the proposal. In the current national plan there are some inconsistencies with regard to the disease eradication testing of infected herds that needs to be addressed

## MAF Comment

See the previous comments made on Special Movement Control Areas. It is likely that improved animal tracing records to be held in NAIT will be able to provide the AHB and the Tb Strategy with improved risk profiling in a number of areas.

### *9.6.3 Change of herd status from Infected to Clear 1*

Five submissions were received on this section all of which are strongly supportive and see it as a positive option in the strategy to advance the management and eradication of bovine TB

in New Zealand. One of the five submitters notes that the function of this section reduces the risk of residual herd infection and suggests that an additional whole herd parallel blood test or similar be required to change herd status from Infected to Clear 1.

#### MAF Comment

MAF notes the views above.

#### *9.6.4 Suspended status herds*

One submission was received which supports the suspended herd policies submitted strongly in support of the proposal to apply suspended status to herds where anergic animals may be present in the herd. The committee believes restrictions applied to these herds will assist in the reduction of spread of infection.

#### MAF Comment

MAF notes the views above.

#### *9.6.5. Exemptions and exceptions*

No submissions were received on this section

#### *9.6.6. Quality assurance programmes*

Sixteen submissions were received relating to Quality assurance programmes -12 submitters expressed their support in relation to AHB undertaking further work to develop and evaluate the use of quality assurance for the programme and provided the following feedback:

- The benefit of such a system will enhance education and safe buying practices for herd owners eligible for quality assurance systems.
- Quality assurance systems should not be over onerous on herd owners and should provide the same assurance of TB freedom as herd testing.
- Quality assurance programmes should enable farmers, particularly deer farmers, to obtain agreed derogations from standard testing, movement control and other regulatory protocols in exchange for commitment to other procedures that provide equivalent information about the herd or equivalent management of risks.

Two submitters commented only that they do not support the idea of farmers obtaining agreed derogations from standard testing and felt all farmers should adhere to standard AHB procedures.

One submitter opposed the quality assurance programme without further comment.

One submitter questions why there is not an immediate relaxation of testing requirements in historically “free” areas. All efforts in the Vector Free Areas should be devoted towards surveillance of the vector populations and reliable post mortem monitoring at the DSPs.

#### MAF Comment

MAF acknowledges the comments above. The issues raised relate to operational aspects of the Strategy and do not need to be addressed through any change to the Tb strategy.

### 9.6.7 Reporting from slaughter premises

Twenty-three submissions were received on this section.

Twenty submitters support a clear regulatory requirement for all slaughter premises to have a reading and recording system of all the official identification of animals processed at all slaughter premises.

- Three out of the 20 submissions would like to see this policy introduced at the same time as the implementation of the reviewed Strategy
- One submitter has suggested that the proposed 24 months implementation window following the introduction of the amended Strategy is reduced to 12 months.
- Two submitters suggested significant deterrents be applied for non compliance.
- One Submitter suggests that the new rules for reporting from slaughter premises are flexible enough to allow the action to be taken by the slaughter premises or an appropriate third party designated by a slaughter premises. Strongly recommends that a yearly review take place of the efficiency gains from slaughter premises reporting.
- One submitter suggests that strong regulatory requirements are developed so that any information on infection that comes back from slaughtered stock is able to be used to trace any TB problems correctly.

One submitter believes the information relating to non TB reactors has not been used by AHB and therefore questions the benefit of continuing with the existing rule. The submitter believes that there are currently misunderstandings and inconsistencies with the application of existing requirements by meat processors, New Zealand Food Safety Authority, AsureQuality and the AHB of the current requirements that need to be addressed. The submission states that the document proposes a further requirement (rule) which would oblige meat processors to provide the herd number (from the Animal Status Declaration) of the immediate supplier of all cattle and deer. Furthermore, the imposition of this additional requirement would add an additional cost to industry (sourcing the herd number from the Animal Status Declaration, manually inputting into a computer, transferring to AHB and following up on missing or mismatched data). This requirement will increase costs for no benefits to the processor.

#### MAF Comment

MAF notes the views above. It is likely that the individual animal tracing being developed in NAIT will very substantially cover this proposed change to the Strategy, and may make it unnecessary. The NAIT organisation and the AHB will further consider this proposed change to the strategy.

### 9.7 Surveillance

One submission was received on this section and commented that monitoring of vector populations for disease should be high priority, and suggested that every dead possum found (trapped, road kill, poisoned or found) should be tested for Tb.

#### MAF Comment

MAF notes the views above.

## 10. VECTOR CONTROL

### 10.1 Containment

Five submitters made comment in relation to containment. Four submitters support the key elements of the containment Strategy to control vector populations. However one submitter raised concern about how the AHB will manage and mitigate the TB impacts on farmers in the containment area's. Submitter feels there is a risk of segregating TB herds of cattle in areas with farmers unwilling to buy cattle and deer in these areas.

It has also been proposed that with in the maintenance areas the AHB should have a funding stream available for farmers to be able to carry out vector control on their properties under a shared funding arrangement.

#### MAF Comment

MAF acknowledges the comments above, but notes that the issues relate to operational aspects of the Strategy. MAF will ensure the AHB takes the comments into account.

### 10.2 Rollback of Vector Risk Areas

Eight submissions were received on this section, seven submitters support the goal of reducing the geographic extent of Vector Risk Area's and the number of herd exposed to vector-borne infection and supportive of the AHB vector control policies and endorses eradication as the only viable long term option for control of TB.

One submitter made the following comments:

- Areas within the Vector Risk Areas have the same classification and the inference is, that they all have the same residual risk of vector infection, even though the vector control activities vary greatly across the VRAs. Therefore, it is not possible to assess the residual risk from vectors as AHB do not have a means of measuring it, except through cattle and deer herd surveillance.
- As the new program has as one of its objectives the reduction in the area of the VRA, the AHB will need to develop a classification system to assign a risk of infection in the wildlife to all areas of VRAs, a vector risk allocated to land areas.

#### MAF Comment

MAF acknowledges the comments above, but notes that vector risk classifications are an operational issue best addressed by the AHB, and do not require any amendment to the Strategy.

### 10.3 Eradication

15 submitters commented on this section all in which support the goal of eradication and understand the need to evaluate total eradication of TB from New Zealand's wild life populations. Other comments made in relation to the eradication concept are the following:

- Six submitters note that there is a need to recognise other agencies with a role in the control of vectors where there are mutual benefit to the strategy goals and objectives.
- Four submitters request that more stringent monitoring of the success of eradication is undertaken.

- The same four submitters also recommend that if eradication in the proposed trail areas is not achievable due to funding or other constraints, the goal should be reassessed.
- One submitter support applying possum control through to 2024/25 to 25 percent of the known VRAs, targeting small isolated VRAs and maintaining vector control in “roll-back” zones as VRAs are reduced in size.
- Two submitters support the following concepts:
  - Proof of concept of eradication of the disease of the wildlife population in heavily forested areas of New Zealand.
  - Seek rollback to the boundaries of vector risk areas, to increase their size in a cost effective and sustainable manner, with an initial focus on northern Wairarapa and Northern Canterbury.
  - Achieve a well advanced stage of control in VRAs elsewhere in the South Island.
  - Efficiency and logic of the targeting resources to expand VFAs as a staged approach. Note that AHB takes special care to ensure that the prevalence of TB in areas with high incidence rates such as the West Coast does not rise above current levels.
  - One submission supports the move away from current management focus on infected herd numbers to one that focuses on eradication and rolling back TB vector population.

One submitter’s suggests that the West Coast has areas that are appropriate for a “Proof of Concept” trail. If such a trial were to precede it was suggested that it should occur on the West Coast. By undertaking the concept of eradication in an area with infected herds this trial would achieve two objectives.

1. Proving the feasibility of eradication; and
2. Reducing the number of infected herds as the vectors are removed. Would also provide an end point for some of the work being undertaken on the West Coast. The proposed trial areas in the proposed Strategy have low or no infected herds, which makes little sense.

One submitter suggested that the proof of eradication concept projects at Rangitoto and Hauhungaroa Ranges, and Holonui Hills should be 100 percent nationally funded projects.

One submitters commented tyat “Eradication strategies under this proposal which have been budgeted to allow for ground-based possum control for nine continuous years, or for three aerial control operations, five years apart.” The submitter also noted that the statement appears to be at odds with the definitions of Eradication in section 8.3 -d. which states “possum densities within the defined area have been held at two percent or less residual trap catch index (RTCI) for the last five years...” There is further confusion with reference to Eradication in Section 21, methods for measuring achievement of the objectives (p.37) in which it is stated that there should be a maintenance period where the RTCI is maintained at 2 percent for a min of 4 years and a further eradication period where the RTCI is held at this level for a minimum of 2 years.

## MAF Comment

MAF acknowledges the comments above and notes that the amendment proposal has made a significant change compared to the current Strategy, in basing its management programme on reducing the size of vector risk areas around the country, and testing the feasibility of achieving total eradication of Tb from wildlife and from cattle and deer herds in a variety of habitats as a long-term option.

## 10.4 Locally Supported operations

Three submissions contained information relating to this section and comments are as follows:

- One submitter states that as the proposed Strategy has a priority of reducing 2.5 million ha of vector risk area, some areas within the core maintenance area may have some limiting factors on the vector control carried out on these areas. Within these maintenance areas the AHB should have a funding stream available for farmers to be able carry out vector control on their properties under a shared funding arrangement. This work would have to add value to the vector control programme and have tangible outcomes for the vector control programme (e.g. the High-Country Project).
- Two submitters note that the West Coast has some areas adjacent to the core maintenance areas which are being excluded from vector control. As these farmers pay levies and no doubt rated for the regional share it is suggested that the AHB should have a funding available for these farmers to be able carry out vector control on their properties under a shared funding arrangement.

### MAF Comment

MAF notes the comments above, but considers that detailed issues of operational budgets such as these are best dealt with by the AHB, and that a change to the Strategy is not required.

## 10.5 Vector Control technology

Eleven submitters commented on this section.

Ten submitters supported the continued use of 1080 to achieve the long term goal of eradication of TB from the wild animal population in New Zealand, particularly in remote areas. Submitters also had the following comments:

- Would like to see consideration for alternatives to current vector control being included in this Strategy, primarily cattle vaccines.
- Submitters agrees with the key elements of the vector control proposal and submits that the Strategy detail in relation to vaccine research should be expanded to include collaboration with agencies in other countries that are pursuing this approach to disease eradication. Doing so will, we believe, provide greater leverage from the funds invested in research.

One submitter would like to see the early adoption of “low sow” techniques of possum control and notes that the advantage of this method of bait delivery is its cost savings which will allow larger areas to be controlled at no extra cost.

Three submitters suggest that the proposal is heavily reliant on aerial 1080 as its control method. Other than briefly in 14.2 (“Effects of wild deer control on the environment”) there is no concession to determine the best control method after discussions with affected parties.

One submitter noted that the new Strategy relies very heavily on the continued and extensive use of toxins. If the predicted outcomes are achieved, NZ will still have very extensive areas of infected wildlife in 2025 requiring long-term expense control. The lead-in time of 5–10 years for developing alternative measures, an inadequate level of research over the next

15 years will leave NZ with no alternatives methods should either the continuing level of control costs or the widespread use of toxins become unacceptable.

One submitter has faced significant usage of aerial 1080 on behalf of multiple agencies (including AHB) and the over reliance on this method with its considerable by-kill of deer has caused significant harm to hunting opportunities in our region. They are accordingly opposed to any form of untargeted pest control. Standard aerial 1080 drops (such as are unfortunately usual practice) are virtually random killers of mammals be they pests such as possums or as valued game animals like deer.

### MAF Comment

These submissions are regarded as being outside the scope of the Strategy review, as the use of 1080 is not proposed as an objective or a Strategy rule which must be included in the Order in Council. Nor is it part of an operational policy such as movement control or disease management measures which take their effect from provisions in the Order. It is noted as one tool to be used among others in carrying out vector control operations, to help achieve containment, rollback or eradication of possum populations.

MAF considers that the most appropriate forum for discussing the use of 1080, and for people to have made their views known, was provided by the Environmental Risk Management Authority's (ERMA's) comprehensive re-assessment in 2007 of the use of 1080.

### 10.6 Monitoring

Three submitters made the following comment in relation to this section.

- With the proposed changed direction as outlined in the Strategy document additional measures of reporting progress are required. The level of reporting to regional committees should include a statistical breakdown of species and farm type with changes in status as they occur over time. Differences between actual and expected performance in relation to both herd and land vector status need to be provided and information at national level needs to be provided to key stakeholder organisations.
- As part of monitoring scheme progress and future objective setting the three submitters recommend that an annual joint external and internal technical review occur to examine scheme performance and detailed external technical, performance and financial review should occur at five yearly intervals.

### MAF Comment

MAF acknowledges the comments above, and considers that monitoring is an operational aspect of the Strategy best dealt with by the AHB, not requiring a change to the Strategy rules. MAF is due to re-negotiate a new funding agreement with the AHB, which will result in improved reporting of the performance of the AHB in implementing the Strategy.

## 11. ALTERNATIVE MEASURES TO ACHIEVE THE OBJECTIVES

### 11.1 Vaccination of cattle

Two submitters provided comments in relation to this section.

One submitter considers that vaccination of cattle as an alternative measure of control is not appropriate. Concern is raised that if cattle are vaccinated then Tb free status will be difficult to determine, as testing will not be carried out and will not reveal if Tb is present.

One submitter does not support the proposal to investigate the vaccination of cattle against Tb. The concern is that the perception of New Zealand as a TB country by overseas markets would be perpetuated by introducing a vaccination programme. This also extends and complicates the process of declaring New Zealand a Tb free country and interpreting surveillance testing of herds.

#### MAF Comment

MAF acknowledges the views above.

## 12. STRATEGY RULES

One submitter provided the following comments on this section:

- Supports AHB in creating reasonable rules for slaughter premises, operators and farmers to maximise the potential for success of the Strategy and also supports AHB enforcing these rules.
- Along with making and enforcing rules, AHB must also ensure that an appropriate level of education, assistance and support is provided for those affected to ensure that they do not inadvertently break the rules.

#### MAF Comment

MAF acknowledges the views above.

### 12.1 Identification of livestock at slaughter and reporting of information from slaughter premises

Two submitters provided the following comments:

- support the proposal to legislate for the mandatory reading and recording of the official identification of cattle and deer slaughtered at all slaughter premises and report this to the AHB. The submitter would like to see this policy introduced at the implementation of the reviewed Strategy and significant deterrents applied for non compliance. The submitter strongly endorses this rule amendment as one of the best proposals in the review for the management of Tb in NZ. Information is vital for the evaluation of the presence of Tb in defined geographic areas.
- support in principle the proposal to legislate for the mandatory reading and recording of the official identification of cattle and deer slaughtered at all slaughter premises. However the requirement to report on all cattle or deer slaughtered may be interpreted as an invasion of privacy and outside the mandate of the AHB to manage the strategy in New Zealand. The submitter believes that the information should be read and recorded by slaughter premises as proposed but the information passed to AHB only in those instances where animals are notified as suspect to Tb infection.

### 12.2 Information from animal identification systems

The submitter on this section notes that many of the proposed disease control policies in the amended Strategy require the introduction of individual animal identification so that tracing

of animal movements is easily administered. The submitter supports in principle the introduction of the NAIT proposal.

#### MAF Comment

See previous comments in paragraphs 60 and 91 on the ability to link the Tb strategy operations with livestock identification under NAIT.

### 13. THE EFFECTS OF THE TB STRATEGY ON THE RELATIONSHIP OF MAORI AND THEIR CULTURE AND TRADITIONS WITH THEIR ANCESTRAL LANDS, WATERS, SITES, WAAHI TAPU AND TAONGA

No comments were received on this section.

### 14. THE EFFECTS OF THE TB STRATEGY ON THE ENVIRONMENT AND MARKETING

Two submitters provided the following comments on this section:

- Supportive of 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 or disease we support effective control and eradication of infected deer to prevent spread or re-infection of primary vectors.
- 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.
- Agree with the environmental benefits of vector control that the Strategy outlines and believes that if control methods are appropriately selected then these outweigh the possible negative environmental effects, the proposed Strategy will help maintain the quality image of New Zealand's meat and dairy products in overseas markets.

#### MAF Comment

MAF acknowledges the views above.

#### 14.1 Effects of possum control on the environment

No comments were received on this section.

#### 14.2 Effects of wild deer control on the environment

One submitter appreciates and endorsed the consideration of 1080's impact upon non-target valued species. The statement still effectively pre-determines that the control method will be aerial 1080 of some form or other. The use of aerial 1080 containing deer repellent has occurred on a number of AHB sponsored control operations in recent years and while other methods would be more welcome, it is still better than standard 1080 and we do appreciate AHB's ongoing commitment to fund that mitigation method.

## MAF Comment

MAF notes the views above.

## 15. RESEARCH

### Submitter Comments:

Twelve submitters specifically commented on their support the continuation of the AHB's proposal to invest approximately \$2 million per year on research into disease and vector control options outlined in the amended Strategy.

Nine submitters supported the need for ongoing research and development into all aspects of the programme and provided additional comments and suggestions which are as follows:

- As the program pushes further into new areas, ongoing research into the disease in all the main species and into alternative means of disease control, namely vaccinations are required. This research should aim at both fundamental and applied research.
- It is recommended that the current research programme be reviewed with the objective of having a clear long term strategy and a focus that strongly supports the control schemes proposed objectives.
- Would like to see current access rules be examined with the intention of allowing easier and faster access to information. Real time online and voice data access to such information is seen as a future requirement.
- Support research around simplifying and improving the diagnostics that will be applied on vector populations.
- Encourage the research and development of a more socially acceptable and cost effective alternative toxin for rugged and expensive terrain.
- Consider vaccination trials as a possible option for some West Coast farmers in the interim before the official eradication program is planned to begin on the West Coast.

Other perspectives on the research proposal include:

- One submitter notes that this is largely maintenance of current research and submits that there needs to be a greater investment in research on control methods to accelerate the effectiveness of the Strategy. It is suggested that the AHB funded research should include collaboration with other international researchers to optimise the benefits of jointly funded research programmes.
- One submitter supports the development of more effective tools and techniques to manage Tb risk in New Zealand. This submitter does not believe that they have a role or responsibility to fund research and development activity as part of “national costs”. As a regional share funder it cannot justify contributing toward to an activity which carries considerable risk and where the principle beneficiaries are not the ratepayers of the region.
- This submitter also considers that on the same basis, trials used to establish ‘proof of freedom’ of Tb from wildlife populations in any specified area is a research activity at this stage. As and when it can be scientifically proven that Tb can be eradicated from wildlife populations in specified areas then Council could consider funding work involving Tb eradication on the basis that this would then be a part of normal vector management.

## MAF Comment

MAF notes the comments above.

## 16. BENEFITS AND COSTS OF THE PROPOSED NATIONAL PEST MANAGEMENT STRATEGY

Refer to 16.4 for comments on this section.

### 16.1 Approach to analysis

No comments were received on this section.

### 16.2 Summary and conclusions

One submitter commented that the strategy refers to a cost benefit analysis based on a 30 year period, but provides no details or references that would allow any independent assessment or analysis. The use of the 30 period raises another deficiency of the document in that the Strategy only covers a 15 year period and does not provide for what is envisaged beyond this period.

#### MAF Comment

MAF acknowledges the comment above. The Strategy will be reviewed at least every five years as required by the Biosecurity Act, which will provide a clear means for monitoring progress.

### 16.3 Benefits of the proposed strategy

#### *16.3.1 Key Beneficiaries*

#### *16.3.2. Benefit drivers*

#### *16.3.3 Economic net benefits to society*

#### *16.4 Costs of proposed strategy*

Three submitters commented on this section and provided the following views:

- agree with the stated beneficiaries and benefits of the proposed Tb strategy and despite the Strategy's costs exceeding those of an ad-hoc approach, these benefits outweigh the increased costs.
- agree that the primary beneficiaries of the proposed Strategy are farmers and producers/processors of beef, dairy and deer the fact that New Zealand as a whole relies heavily on agricultural exports must not be forgotten. This reliance goes beyond a "less tangible benefit of maintaining and enhancing New Zealand's high quality food export trade brand" if in the future of our food exports are rejected due to the prevalence of Tb infection.

#### MAF Comment

MAF notes the comments above.

## 17. FUNDING

Forty submitters provided comments on this section and provided the following views:

- Ratepayer's funds sourced from the various regions ought to be spent in the district and regional share should not include a contribution to national costs, apart from its contribution to research and development. The frequency of payment of the regional share

should be negotiated, with payments based on the completion of monitored vector control work.

- Funding of scheme is the greatest concern - particularly the 10 percent local share that is collected by Regional Council's and a potential misuse of funds needs to be a stricter government regulatory control over the Regional Councils collection of funds.
- It is suggested that the AHB should specify funding requirements for the next three years for the Long Term Council Community Plan, Prior to Public Consultation, to ensure council support for the Tb programme.
- Disappointment with the shortfall of funding to deliver a more progressive Strategy. With the present focus of 'proof of eradication' from domestic and feral animals, we are extremely concerned about the lack of progress the West Coast would see under the present terms of the next Strategy.
- The current funding model is uncertain and requires renegotiation to secure regional contributions.
- Concerned with the lack of a principle based approach to allocating industry funding.
- Current levels of funding as a minimum are vital in order to maintain progress in reducing the levels of bovine TB in both wild and domestic animals in NZ. However the committee suggests an amended funding model to secure long term funding for a long term Strategy.
- West Coast submitters would like to see an increase in funding across all sectors to enable the opportunity of achieving TB freedom throughout New Zealand sooner. Reducing the long term burden of TB to beef, dairy and deer farmers in NZ Agriculture sector.
- Concern with the rationale to justify a regional contribution to the NPMS and suggest that it is timely for a review of the funding policy. The Wellington region, like many other regions believe that the priority for regional funding is to maintain the gains of post Tb projects, and to provide higher level funding into biodiversity projects.
- Increase of additional funding by at least 10 percent.
- Concerned that with reduced expenditure will result in increase infected herds over time particularly southern parts of the Wellington region.
- Recently seen a decrease in possum numbers which is expected to lead into reduced infected herds. Momentum needs to be maintained to see long term benefits Therefore the programme/funding should not change on the West Coast when it is just starting to yield results.

## MAF Comment

The Tb Strategy is an \$82 million per year programme that involves measures to control the disease in cattle and deer herds, and in the populations of wild animals that also harbour the disease. The Crown currently contributes \$30 million per year to the costs of the strategy, with the balance being funded by the cattle and deer industries and regional councils

Maintaining the security of funding is always a key component of establishing and continuing a pest management strategy. The Biosecurity Act requires that after each five year review of a pest management strategy, the Minister must be satisfied that there is likely to be adequate funding to implement the strategy.

Following the initial discussions, good progress has now been made with funders making the firm commitments required for the new Strategy's implementation over the next five years. MAF considers any remaining funding risks can be managed.

A review of the Strategy's funding arrangements for the period after the 2014/15 year will be carried out prior to the next Strategy review in 2016.

## 18 COMPENSATION

Twelve submitters broadly support the need for the continuation of the current compensation model and made the following comments:

- the compensation payable should be reviewed 5 yearly with the intent to reduce or restrict compensation payments on the following basis:
  - the initial period of the Strategy consideration should be given to a policy that encourages better risk management behaviours from herd owners by limiting compensation for risk activity,
  - herd owners in surveillance areas should not qualify for compensation where risk introductions, such as purchases from STA annual or Movement Control Areas have been the source of any infection,
  - levels of payment for compensation should reduce incrementally every 5 years during the term of the Strategy to minimal levels
  - areas in containment may need to be exempt from these provisions due to higher rates of reactor animals and financial hardships
- Farmers affected by Special Movement Control Areas should be compensated, for example, 10 percent above the current compensation model.

### MAF Comment

MAF notes the comments on compensation above.

## 19 POWERS OF THE BIOSECURITY ACT REQUIRED

No comments were received on this section.

## 20 RELATIONSHIP TO OTHER PEST MANAGEMENT STRATEGIES

Thirteen submitters provided the following remarks:

The majority of submitters support the need to develop and maintain relationships with other organisations with similar goals in managing wild life; in particular the effective transitions from AHB-led possum control programmes to regionally-led programmes in areas where TB is considered to have been eradicated from wildlife and possum control or other wildlife control is no longer required for TB control.

Other comments relative to this section included support for the proposed action that AHB will seek to explore and maximise opportunities to coordinate its programme with regional pest management strategies and to promote effective transitions from the Tb vector control to regional programmes when Tb is no longer considered a threat. Collaboration and cooperation in these areas are seen as critically important to building and maintaining productive working relationships between the Animal Health Board and Regional Councils.

One submitter suggests an amendment to include mechanisms for improving transparency, reporting and communication between the AHB and regional councils. It is suggested that Regional Affairs Committee, Biosecurity sub-committee and AHB representatives meet on an annual basis to review progress and effectiveness of the vector control programme, including reporting communications.

## MAF Comment

MAF notes the views above.

## 21 METHODS FROM MEASURING ACHIEVEMENT OF THE OBJECTIVES

Four submitters were broadly supportive of the methodology for measuring achievement of the objectives and the implementation of effective transitions from AHB-led possum control programmes to regional-led programmes in areas where Tb is considered to be eradicated from wildlife and possums or is no longer a Tb control requirement. Other comments proposed by submitters included:

- The Animal Health Board should undertake work with all regional councils to develop management strategies as vector risk areas within the region are declared Tb free. Such actions should include transitional funding and leaving infrastructure such as bait stations for example. This will ensure both economic and biodiversity gains are maintained.
- Concerns in regard to the operational phases of post eradication and surveillance. With no vector control in the post eradication and surveillance phases, wild animal numbers may significantly increase. This poses a risk to the speed and distance that Tb could spread should it be inadvertently introduced to a vector free area. Maintenance at a low Residual Trap Catch Index (RTCI) is simpler and more cost effective than an initial reduction to that level, the submitters requests that either the Strategy allows for maintenance of wild animals at low RTCI beyond the eradication phase, or alternative programmes are arranged which ensure AHB or other agencies maintain the RTCI.
- AHB should be required to produce independent evidence of Tb in back-country areas before it undertakes aerial 1080 operations. Such operations are very detrimental to both recreational hunters and to Wild Animal Recovery Operation (WARO) operators. It should also be required that the AHB prove that Tb presents a direct threat to livestock, before it is allowed to spend money trying to have Tb eliminated. It is recommended that WARO data is analysed independently, to test the Animal Health Board's hypothesis, and re-assess the Strategy accordingly.

## MAF Comment

MAF notes the views above.

## 22 LEVY FUNDING OF THE PROPOSED TB STRATEGY

One submitter proposed using a “low sow” system which, cost wise, will mean a 30–50 percent saving per ha. The increased use of pigs for “proof of freedom” surveillance, either feral or collared released pigs will further reduce costs. The use of the BCG oral vaccine with all poison operations, will also give more certainty to the “proof of freedom” proof.

## MAF Comment

MAF considers this submitter's comments are more relevant to the funding issues covered earlier in section 17, and should be read in that context.