

12 May 2016

To the Hon Robert Armstrong MLC  
Inquiry Chair

Dear Sir,

**Re: Wild fallow deer population management and proposed industry deregulation**

I write in response to a letter received, dated 6 April 2016, regarding fallow deer in Tasmania and the proposed deregulation of the deer industry.

In 2013 my wife Connie and I purchased Springfield Deer Farm. Prior to our arrival to the picturesque Mole Creek property, the farm had been in operation under the previous owners for approximately twenty two years.

In addition to the substantial purchase price, we invested a large amount of money upgrading the farm's facilities, on obtaining meat inspector qualifications - a two year TAFE course, and on marketing our produce to promote and further develop the business. We operate our own abattoir (which is regularly inspected by Bio Security authorities), and we pay government levies per kilogram of meat sold. Our investment and commitment to delivering a quality Tasmania product is without question. In addition to wanting to achieve a return on our investment in and our commitment to the industry, we are absolutely adamant that the proposed changes to it must not be pursued.

There are numerous reasons why deregulation would be potentially terminally damaging to the Tasmanian venison industry, and I have taken the liberty here of documenting a number of valid ones for your consideration:

1. As fallow deer are highly skittish animals, a correct despatch procedure needs to be implemented. As any incorrect process will lead to bruising and blood splatter leaving the meat only suitable for pet food, the informed slaughter of the animal is paramount to delivering a quality product. Deregulation would not only mean we would be competing with inferior quality products but ones that have been produced at minimum expense with little or no regard for the high production and health standards which we, as certified producers, pride ourselves on. It would also limit our ability to make surety about the quality of our production – something that currently separates us from our competitors.
2. Whilst Tasmania is hydatid free at the moment, and major efforts are being undertaken to ensure it remain so, with large amount of offal left in the bush and on farms for roaming dogs to consume, it is arguably only a matter of

time before this could be passed on to humans. Deregulation would only serve to make this likelihood more probable.

3. It has been publicised that there are more deer visible around towns, and it has been erroneously concluded that the population is increasing. The more practical conclusion is that the increased visibility is in large due to the very poor climatic conditions including a very harsh winter followed by extensive drought, and animals including deer are as a result congregating closer to towns to feed on irrigated farms and gardens. The perception that numbers have increased, and therefore should be addressed through de-regulation measures, is, quite frankly, mistaken, ill-informed and short sighted in the extreme. We saw a large increase in the wallaby population and subsequent deregulation of that industry with the resulting outcome being no real impact on its numbers. Other solutions such as an extended hunting season; a well-managed and administered annual mass cull; allowing farmers to shoot deer for their own use; and shooting deer for pet food, should be explored.
4. Even in the regulated environment our export opportunities are very limited. We already face stiff competition domestically from the deregulated South Australian industry that happily flood the market with of low quality venison. The last thing we want to see is what basically amounts to 'road kill' entering the market, driving down the quality, and essentially closing down operators like us who strive for quality in an industry that, contrary to some reports, is already oversupplied. Deregulation would further diminish our domestic and export market penetration opportunities delivering quite the opposite outcome of the one we are seeking to achieve – the development of niche export markets that seek our uniquely Tasmanian gourmet product. Tasmania is the current darling of the global culinary community and as such drives tourism numbers with those seeking a genuine gourmet experience responsibly produced in our pristine environment. This should not be undervalued nor undermined. We have organised a number of promotions with local and mainland chefs to highlight the quality of Tasmanian deer meat and its many health benefits. It is clear that what the restaurants and other consumers require is a continuity of high standard, hygienically produced meat with traceable origin.

Based on the many reasons presented above it is our firm opinion that rather than looking at deregulation, the Government should be:

- a) assisting the Tasmanian industry in promoting the benefits of venison consumption, the quality of its products, and its accredited and responsible approach to production;
- b) lobbying for lower shipping rates enabling us to remain competitive with our mainland colleagues;
- c) further driving bio security initiatives to close any loopholes which could tarnish our currently enviable status as clean producers of high quality venison.

And finally...

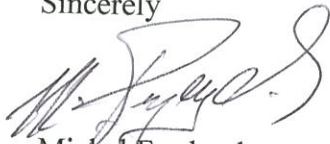
- e) should pursue positive regulatory measures, including appropriately managed population reductions, that will keep Tasmanian producers on the land ensuring that the industry remains viable, sustainable and competitive now and in to the future.

As a board member of Rural Business Tasmania, an organisation that delivers the federally funded Rural Financial Counselling Service, I see firsthand how hard some farmers find it to survive on their land. Deregulation of the deer industry, in my opinion, will only serve to push primary producers in that sector to breaking point.

We respectfully request that rather than apply a short sighted, reactive, and arguably flawed solution that will not deliver the desired outcome of a reduction in deer population numbers, that you instead adopt a consultative whole-of-industry approach that will ensure it reaches its full potential in production, export, and gourmet tourism terms.

I look forward to your support and am happy to discuss with you these issues in greater detail at any time.

Sincerely



Michal Frydrych  
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