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## **Draft Hog Deer Management Strategy 2008 Submission**

**December 2008**

The Invasive Species Council is an environmental NGO that advocates policy and legislative reforms to better protect Australia's environment from invasive species.

Feral deer are already a very serious invasive problem as recognised by the recent listing of Sambar as a potential threatening process in Victoria and the herbivory and degradation caused by feral deer as a key threatening process in NSW. With numbers expanding rapidly and herds multiplying (eg. Moriarty 2004, West & Saunders 2007)<sup>1</sup>, feral deer are likely to become an environmental threat to rival goats, horses, donkeys, camels and other better recognised invasive animals.

Deer are a recognised environmental problem all over the world, even in areas where they occur naturally but are not contained by predation. The Invasive Species Council has a database of journal articles that document the harms caused. The impacts of hog deer documented thus far are summarised in *The Mammals of Australia* (Bilney & Bilney 2008)<sup>2</sup>:

“Although ecological studies are limited, severe damage caused by Hog Deer has been confirmed in natural rainforest and on rainforest restoration sites. Browsing and antler-rubbing has been responsible for killing young saplings of preferred species such as Black Wattle, varnish Wattle, Blackwood, Kangaroo Apple and Yellowwood, preventing their regeneration and, in some areas, resulting in the alteration of plant community composition and structure.”

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<sup>1</sup> Moriarty, A. (2004) The liberation, distribution, abundance and management of wild deer in Australia. *Wildlife Research* 31: 291-99.

West, P. and Saunders, G. (2007) Pest Animal Survey 2004-2006. A review of the distribution, impacts and control of invasive animals throughout NSW and the ACT. NSW Department of Primary Industries.

<sup>2</sup> Bilney, R.J. and Bilney, R.J. (2008) Hog Deer. In S. van Dyck & R. Strahan (eds) *The Mammals of Australia*. New Holland Publishers, Sydney.

The draft management strategy for Hog Deer proposes goals and strategies that are anathema to best practice management of threatening invasive animals and biodiversity conservation. It is clear that the purpose of the strategy is to improve recreational hunting opportunities for Hog Deer, and that it will lead to expanded populations and range of Hog Deer. The goals of maintaining a “sustainable” population of Hog Deer is not compatible with conserving biodiversity, although we note that the goal is to ‘minimise’ rather than ‘prevent’ impacts on biodiversity, which presumably is deliberately worded to allow latitude in the level of damage to biodiversity that will be tolerated.

In particular, ISC is concerned about the proposed ‘property based game management’ strategy, whose ostensible goal is to use incentives and rewards for hunting as a way to motivate habitat protection and restoration appropriate for deer (and other species). The incidental environmental benefits that may arise from this strategy will be far outweighed by the environmental costs arising from feral deer protection. It is much more correctly seen as a strategy to promote deer hunting.

We attach a recently released report *A Deer Mistake*, which critiques the property based game management strategy. This report forms part of our submission. It explains why basing deer management on recreational hunting is likely to lead to worse environmental impacts from feral deer. There is evidence from all around the world that recreational hunting is ineffective as a way of managing feral animal problems. At best (and ignoring animal welfare problems) recreational hunting may sometimes contribute to controlling populations in localised areas. But this is unlikely to be the case in Victoria, for the motivation of recreational hunters to increase deer populations and spread hunting opportunities will over-ride any control benefits gained from recreational hunting. The report does not focus wholly on Hog Deer, but its conclusions apply to the property based game management proposal in the Hog Deer strategy.

One of the justifications given for the deer protection approach in the strategy is that Hog Deer are suffering population declines in their native range. Contrary to previous assertions, the document recognises that they are not formally recognised as threatened, as they are not listed as such by the IUCN. The declining conservation status of Hog Deer in their native range is being used as an excuse to increase their populations in Australia for the benefit of recreational hunters. This is not an appropriate way to conserve Hog Deer, for its presence in Australia as a feral species will damage the Australian environment and threaten Australia’s biodiversity. Conservation of biodiversity requires a commitment to the full variety of species and ecological communities, not just one or a few. Those with a special regard for deer, as claimed by the Australian Deer Association, should work to protect deer in their native habitats rather than damage Australia’s environment.

The Invasive Species Council urges that the management goals for Hog Deer be protection of Victoria’s biodiversity, which requires eradication where feasible and population reduction where not. Their protection under the Wildlife Act should be rescinded.

**ATTACHMENT:** Booth, C. (2008) *A Deer Critique*. Invasive Species Council