



2 October 2020

Ms Mechtild Rossler,  
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France  
By email: [m.rossler@unesco.org](mailto:m.rossler@unesco.org)

## Invasive species 'fallow deer' threat to Tasmanian Wilderness World Heritage Area

Dear Ms Rossler,

We write to draw your attention to and seek your assistance in addressing an urgent and increasing threat to the natural values of the Tasmanian Wilderness World Heritage Area (TWWHA), namely the flora<sup>1</sup> impacted by the incursion of fallow deer.

The threat posed by growing numbers of fallow deer (an invasive species in Australia) to agricultural areas as well as protected areas in Tasmania has been known for many years but a recent wild fallow deer aerial survey initiated by the Tasmanian Department of Primary Industries, Parks, Water and Environment revealed numbers have at least doubled to about 54,000 in just four years - in 2016 professors Ted Lefroy, Christopher Johnson and David Bowman reported there were an estimated 25,000 feral deer in Tasmania.<sup>2</sup>

The survey covered agricultural areas, part of the TWWHA and adjoining areas. We have attached the survey results.

Neither the State Party, Australia, or the subnational entity, the state of Tasmania, is taking the rapidly expanding feral deer population seriously. Although deer are listed as a pest animal on mainland Australia, they are not in Tasmania.

It is imperative the special protection for deer under Tasmanian Wildlife Act regulations be removed consistent with deer posing an increasing threat to the TWWHA and consistent with the TWWHA Management Plan, noting:

'The prospect of eradicating an introduced species rapidly diminishes in the TWWHA when it becomes established beyond a narrow entry point. This is because of the area's limited access, topography, vegetation and climate constraints.' p 115

<sup>1</sup> In the TWWHA, six broad ecosystem groups are recognised: rainforest; sclerophyll communities (forest, woodland and scrub); alpine and subalpine treeless vegetation; buttongrass moorland; coastal communities; and wetland communities. All of these floristic associations have unique features and values of both national and international significance, which highlight the unusual and outstanding nature of the TWWHA vegetation. Balmer, J et al. 2004. *Floristic Values of the Tasmanian Wilderness World Heritage Area*. DPIWE Tasmania. Accessible at: <https://dipwve.tas.gov.au/Documents/Floristic-Values-of-the-WWHA.pdf>.

<sup>2</sup> Lefroy, T, Johnson, C, Bowman, D 2016. Oh deer: a tricky conservation problem for Tasmania, *The Conversation*, 7 January 2016. Available at <https://theconversation.com/oh-deer-a-tricky-conservation-problem-for-tasmania-43702>.

As a State Party to the World Heritage Convention, the Australian Government has an obligation to ensure that the requirements of the Convention are fully met. In particular, it is required to identify, protect, conserve, present, transmit, and, where appropriate, rehabilitate, the cultural and natural heritage of the TWWHA.

Australia has enacted Environment Protection and Biodiversity Conservation Act legislation to implement its obligations under the World Heritage Convention. The TWWHA is inscribed on the World Heritage List and therefore has protection under the EPBC Act.

However, the Australian Government is currently rewriting the EPBC Act to weaken its provisions. But regardless, the obligation to uphold the Convention remains with the State Party.

In 2015 the report of the UNESCO Reactive Monitoring Mission to the Tasmanian Wilderness made several recommendations to be addressed in the Management Plan, including:

#### Recommendation 18

The State Party should fully reflect biosecurity as a cross-cutting and permanent management priority in the Management Plan and ensure and, as required, step up financial and human capacity to monitor, prevent and manage biosecurity risks.

The TWWHA Management Plan adopted in 2016 incorporated this recommendation by adopting as Key Desired Outcome 5.5:

A comprehensive suite of strategies is in place that minimises biosecurity risks to the natural values of the TWWHA. p122

It undertook:

- In consultation with state and national agencies that are responsible for relevant biosecurity governance and policy development, identify and plan for key biosecurity threats to the TWWHA.
- Update assessments of risks, impacts and control options for priority pests, weeds and pathogens.
- Develop and implement biosecurity contingency plans for potential incursions of high-risk species, and improve coverage of surveillance and monitoring programs for new incursion.
- Where feasible, implement and maintain management and eradication programs for priority species.
- Increase public awareness of biosecurity threats and mitigation actions that can be implemented at the individual level.
- Make Biosecurity strategies for the TWWHA consistent with the State Biosecurity Strategy.

But this has not happened. The risks and impacts of feral deer on the flora values of the TWWHA have not been assessed and action to eradicate new deer incursions has not occurred. Also, Australia has failed to inform the World Heritage Committee accordingly.

It is worth noting the Tasmanian Legislative Council's inquiry into deer, the Tasmanian Government's response in November 2017 and progress to date. We have provided a table, included at the end of this letter, that makes it clear there has been little progress in implementing measures to clarify the nature of the deer threat to the whole of Tasmania and there have been no meaningful measures adopted to reduce that threat, particularly to conservation areas such as the Wilderness World Heritage Area.

Australia's current state of conservation reports of the TWWHA reveal that the comprehensive suite of strategies to minimise biosecurity risks to the natural values of the TWWHA have not been put in place or resourced. In fact, the threat of deer to the endemic vegetation communities is not even mentioned let alone addressed. This contravenes the Management Plan undertaking to:

'Identify new threats to TWWHA natural values and reassess known threats, including weeds, pests, diseases and anthropogenic impacts; and, where possible, develop or review mitigation options, including the strengthening of biosecurity arrangements and increased cultural and volunteer involvement in control and eradication.'

It is clear decisive action is needed to immediately:

- Comprehensively survey the TWWHA and its adjoining boundary areas to assess the existing numbers and location of deer.
- Rapidly complete and implement a deer management strategy that keeps the Wilderness World Heritage Area and other high-value conservation areas deer free.
- Immediately engage professional shooters to start removal of deer from the Wilderness World Heritage Area.
- Declare deer as a pest animal in line with the rest of Australia.
- Remove the special protection for deer under Tasmanian Wildlife Act regulations.

The power exists under the Management Plan to impose a Biosecurity Overlay (Section 3.1.2.4, page 67) that can be used to apply specific management actions and prescriptions to an area in response to a biosecurity event or risk, or as a preventative, pre-emptive measure to reduce risk to particularly vulnerable areas or values - Page 67.

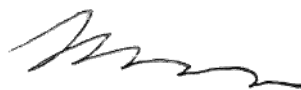
I urge you to intervene with the State Party to draw its attention to its obligations under the Convention to identify and quantify the threat to the TWWHA posed by fallow deer and also to its undertakings regarding Biosecurity agreed under the 2016 TWWHA Management Plan.

Yours sincerely,



**Christine Milne AO**

Ambassador, Invasive Species Council of Australia



**Andrew Cox**

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**Cc Peter Shadie,**

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## ATTACHMENT 1

### Legislative Council inquiry into wild fallow deer: recommendations, government response and progress to date.

LC Inquiry recommendation	Government response 2017	Progress to date
<p><b>Rec 1a.</b> An assessment of the current numbers of deer and future population projections.</p>	<p><b>Supported.</b></p> <p>The Government will undertake a comprehensive state-wide census of wild fallow deer in Tasmania.</p>	<p><b>Partial information.</b></p> <p>A population estimate of the core deer population released August 2020. No information available about the size and extent of the deer population outside this area or future population projections.</p>
<p><b>Rec 1b.</b> The extent of any population spread into non-traditional ranges (including reserves and the World Heritage Area).</p>	<p><b>Supported.</b></p> <p>DPIPWE will work with research partners on a project that will assess the distribution and numbers of wild fallow deer in parts of the TWWHA. This project will complement the state-wide census.</p>	<p><b>Progress unknown.</b></p> <p>No public information about progress except reference to an upcoming program involving camera traps and citizen science.</p>
<p><b>Rec 3.</b> Eradicate deer populations in World Heritage and other areas classified as conservation land and consideration given to recreational hunters as a resource.</p>	<p><b>Supported.</b></p> <p>DPIPWE will work with public land managers, landholders and the private land conservation sector to coordinate targeted control programs to manage emerging satellite populations, and populations moving into and/or impacting on areas with significant conservation values including the TWWHA.</p> <p>The Government will investigate opportunities for regulated recreational hunting in the TWWHA and other Reserves in a legal, safe and responsible manner where land management frameworks allow.</p>	<p><b>Progress unknown.</b></p> <p>No public information available about programs undertaken to manage emerging satellite populations or populations impacting on areas with significant conservation values or the TWWHA</p> <p>While new recreational hunting opportunities were made available in 2018 in the TWWHA, this is unlikely to reduce the population in these areas.</p>
<p><b>Rec 5.</b> Consideration given to a 'demarcation arrangement' to ensure deer populations are confined to their traditional ranges.</p>	<p><b>Supported.</b></p> <p>Game Services Tasmania will use information from the state-wide population census to inform demarcation arrangements and management strategies across different areas of the Tasmanian landscape.</p>	<p><b>Progress unknown.</b></p> <p>No public information about any demarcation arrangements or strategies in different areas.</p>



This diagram superimposes a map showing results of the 2019 aerial survey of deer in Tasmania over a map of the Tasmanian Wilderness World Heritage Area. The diagram was produced by the Invasive Species Council and clearly shows deer not just on the borders of the World Heritage Area, but also within the World Heritage Area itself.

**Note:** The green crosses show surveyed deer.

## Map sources

**Map section 1:** Tasmanian Wilderness World Heritage Area map taken from page 18 of the Tasmanian Wilderness World Heritage Area Management Plan.

- [https://dpiwwe.tas.gov.au/Documents/TWWHA\\_Management\\_Plan\\_2016.pdf](https://dpiwwe.tas.gov.au/Documents/TWWHA_Management_Plan_2016.pdf)

**Map section 2:** Taken from Lethbridge, M.R., Stead, M.G., Wells C., and Shute. E., 2020. Report of state-wide census of wild fallow deer in Tasmania project: Part A: Baseline aerial survey of fallow deer population, central and northeastern Tasmania. Department of Primary Industries, Parks, Water and Environment.

Figure 6, Page 17

- <https://dpiwwe.tas.gov.au/agriculture/game-services-tasmania/wild-fallow-deer-census>