



**Draft Tasmanian Wild Fallow Deer
Management Plan.**

Submission from the
Invasive Species Council

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About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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Overview

This submission is in response to the invitation by the Tasmanian Government to provide comment on the Draft Tasmanian Wild Fallow Deer Management Plan 2021.

The Invasive Species Council (ISC) welcomes the development of a Tasmanian Wild Fallow Deer Management Plan. Feral deer have been increasing in population and spread at alarming rates in Tasmania with the population likely to be now approaching 100,000 and covering 27% of the State. The current estimated annual population growth rate is 11.5% despite hunting. If nothing is done to stem this growth it is likely that Tasmania will have 1 million feral deer occupying up to 56% of the state by 2050¹. This will have dire consequences for the environment, economy and community.

The feral deer situation in Tasmania has evolved while the Tasmanian Government's focus has been on a Quality Deer Management (QDM) policy, which is in essence about maintaining a quality herd of feral deer for hunting and trophies. This hunter focussed policy is now proven to be far from adequate in dealing with the growing feral deer problem in Tasmania and has hindered the effective control of feral deer as the population has grown and spread.

Feral deer have evolved from being a resource for the enjoyment of hunters to now being a serious environmental and agricultural pest as well as being a threat to community safety and amenity. There is now an urgent need for Tasmania to take a new, biosecurity-based approach to managing feral deer.

¹ Cunningham, C., et al. (2021) Dynamics and predicted distribution of an irrupting 'sleeper' population: fallow deer in Tasmania. ResearchGate. <https://www.researchgate.net/publication/351835171>

The Invasive Species Council is so concerned about the feral deer situation in Tasmania that we released a comprehensive feral deer strategy in August this year. This followed extensive consultation with a range of people and organisations concerned about the impact of feral deer and includes full referencing to source data and information. We believe this outlined a constructive and realistic path to tackling the problem of feral deer in Tasmania that takes into account recreational hunting. The ISC encourages Game Services Tasmania to consider carefully the approach in that strategy for incorporation into the final plan. The strategy is available here [Feral Deer Control Strategy for Tasmania](#)

Supporting Principles

There are a number of positive principles in the draft Tasmanian Wild Fallow Deer Management Plan that the ISC welcomes and supports. These include:

1. **Zoning:** We support strongly the principle of having deer control zones in Tasmania however ISC has issues with the boundaries and objectives for the three zones that we have outlined below. This is a positive step towards taking a serious biosecurity approach to controlling feral deer. The “no deer zone” is supported in principle but it needs significant amendment to effectively alleviate the impact of feral deer on the Tasmanian Wilderness World Heritage Area (TWWHA), national parks and Tasmania’s biodiversity and cultural values generally.
2. **Part deregulation:** The ISC believes that fundamental to effective control of feral deer in Tasmania is complete deregulation of their protection. Nevertheless, some deregulation in Zones 2 and 3 to stop hindering effective control is welcomed as a first step.
3. **Community education:** The ISC agrees that investment must be made into community education so there is a better understanding of the impacts of feral deer to enable growing social licence for control programs and support for eradicating deer from areas of high conservation value.
4. **Hunting wont alone won’t control numbers:** The ISC welcomes this acknowledgement. It is abundantly clear that the population is exploding irrespective of hunting yield.

Nevertheless, the ISC has a number of key issues and concerns with the draft Tasmanian Wild Fallow Deer Management Plan and puts forward recommendations to be considered for the final plan.

Summary of Key Concerns and Recommendations

The key concerns and recommendations of the ISC are outlined in detail below and in summary they include:

Deregulate feral deer.

To enable the effective management of feral deer, the plan should support rescinding the partially protected status of deer for game in Tasmania’s Wildlife Regulations (2010) as part of the current review of the regulations.

The no deer zone must be in place in the TWWHA and other national parks.

To protect the outstanding values of the Tasmanian Wilderness World Heritage Area (TWWHA) and Ben Lomond and Douglas Apsley national parks “Zone 3 no deer zone” must be expanded to include these all of these areas and deer must be eradicated from this zone within 5-10 years. This will have a very small impact on hunting opportunities.

The objective of the no deer zone must be firm and ambitious: no deer within 5-10 years.

The objective proposed for the “Zone 3 no deer zone” is vague – eradicate, manage down or contain. These are vastly different outcomes and give no clear direction on what “no deer” actually means. The “no deer zone” currently has no timeframe for having no deer.

Need clear population and impact reduction policies and targets.

The plan needs to tackle the exploding fallow deer population in Tasmania by putting in place clear population and impact reduction policies and targets. The plan should put in place a realistic policy on when deer will be eradicated from Zone 3 and for Zone 1 & 2, a policy that reduces and contains the population of feral deer in Tasmania to an initial target of 10,000 by 2032. This would then be subject to review based on scientific analysis of impacts.

Recognise the impact of feral deer on natural and cultural values.

In recognition of the outstanding biodiversity and cultural heritage values of Tasmania the plan must include goals and objectives specific to the protection and conservation of natural and cultural values from the threats of feral deer.

Stop hindering landowners wanting to control feral deer.

Landowners shouldn't have to rely on agreements with hunters or one off permits to effectively control deer on their own land in “zone 1 sustainable hunting zone”. They must be able to control feral deer as they see fit for their circumstance, including for conservation purposes. The fawning season exclusion period for control must be removed for all landowners. Removal of all landowner restrictions will greatly lower the costs of control to landowners and not remove future hunting opportunities on other properties in Zone 1.

Need professional pest controllers.

The plan must re-enforce that the use of professional pest controllers undertaking aerial and ground shooting and trapping must be part of the range of methods utilised to eradicate feral deer from the “ zone 3 no deer zone” and bring down the numbers in other zones.

Community outreach.

The plan must continue to support improved community involvement, education and awareness of the threats of feral deer to Tasmania's precious environment and economy to gain social licence for control methods. Removal of the partially protected status will help build community acceptance for control.

Time to act.

The plan should be implemented immediately with a commitment to significant additional funding allocated to the control program to ensure the deer population is rapidly reduced.

Improve governance.

The feral deer control program is complex and not just about hunting and game. It should be managed by a broadly representative task force working under Biosecurity Tasmania.

Discussion of Key Concerns and Recommendations

1. Deregulate feral deer

To enable the effective management of feral deer, the plan must support rescinding the partially protected status of deer for game in Tasmania's Wildlife Regulations (2010) as part of the current review of the regulations.

- The partial protection of deer for game purposes under the Wildlife Regulations (2010) has enabled feral deer populations in Tasmania to explode from a few thousand in the 1970's to now approaching 100,000 and covering 27% of the state.
- Farmers, other land owners and public land managers efforts to control feral deer to minimise their impact on agriculture, biodiversity, ecological restoration and amenity will continue to be hindered under this plan by red tape and permits associated with their partially protected status for game.
- The Australian Senate Report on the Impact of Feral Deer, Pigs and Goats, 2021 called for all Australian jurisdictions to change their existing legislative and regulatory frameworks to ensure that wild deer are treated as an environmental pest, maximise the ability of landholders to control feral deer on their land and maximise the ability of park managers to control feral deer in World Heritage Areas and National Parks."

Regulation in the fawn season at least must be removed

- The impact of restricting feral deer control in the fawning season from Nov – March is a major hindrance for landowners trying control feral deer. This is ostensibly for animal welfare reasons but the draft plan recognises that ethical hunters can manage this risk by accounting for fawns dependent on does, and noting that from about three weeks of age fawns start to forage for food and become less dependent. In the draft plan this regulation for animal welfare reasons remains in place in Zone 1 and Zone 2 (unless by permit or PBWMP) but won't apply to zone 3. It's either an animal welfare issue or it's not.
- Tasmania is the only state in Australia that has this regulation for the fawning season as other states recognise the need for ethical year round control.
- **Given this, the fawn dependent season should be abolished altogether in all zones based on the plans own reasoning.**

2. The no deer zone must be in place in the TWWHA and other national parks

To protect the outstanding universal values of the Tasmanian Wilderness World Heritage Area and Ben Lomond and Douglas Apsley national parks these areas must be included in the "Zone 3 no deer zone" and deer must be eradicated from this zone within 5-10 years.

- Most disturbingly, the plan sanctions the retention of feral deer in parts of the Tasmanian Wilderness World Heritage Area and all of Ben Lomond and Douglas-Apsley national parks. Such an approach will eventually see feral deer invading Cradle Mountain and beyond.
- The draft plan refers to the TWWHA being in Zone 3 (no deer), but the zone map shows the TWWHA Great Western Tiers area in zone 1 (sustainable hunting zone) and parts of the TWWHA Central Plateau CA in Zone 2 (mixed management). This is a contradiction.
- This is an entirely unacceptable standard and quite surprising given the Tasmanian government's stated support in 2017 for recommendation 3 in the final report of the

parliamentary inquiry into fallow deer in Tasmania “to eradicate deer populations in World Heritage and other areas classified as conservation land”^{2 3}. Moreover, these areas have a small contribution to feral deer hunting opportunities.

A buffer to the Tasmanian Wilderness World Heritage Area and Ben Lomond and Douglas Apsley national parks of a no deer zone (or at least zone 2) must be in place to be able to effectively manage these protected areas as a no deer zone.

- Zone 1 also runs up to the boundary of the TWHHA boundary SW of Great Lake, around the Central Plateau and below the Great Western Tiers. This will make it very unlikely that the TWHHA can remain free of deer.

3. The objective of the no deer zone must be firm and ambitious: no deer within 5-10 years.

- The “no deer zone” is supported in principle but it needs significant amendment to make the objective less vague and to effectively alleviate the impact of feral deer on the Tasmanian Wilderness World Heritage Area, Ben Lomond and Douglas Apsley national parks and biodiversity and cultural values generally.
- The objective proposed for the “no deer zone” is – eradicate, manage down or contain. These are vastly different outcomes and give no clear direction on what no deer actually means. The “no deer zone” currently has no timeframe for deer eradication and infers that managing down or containing deer may be all that is achieved. This clearly lacks commitment or ambition.

4. Need clear population and impact reduction policies and targets.

The plan needs to tackle the exploding fallow deer population in Tasmania by putting in place clear population and impact reduction policies rather than relying on old QDM policies aligned with maintaining a quality feral deer herd and trophies.

- The plan re-enforces hunter focused policies that have seen feral deer populations explode in Tasmania from a few thousand in the 1970’s to now approaching 100,000 and covering 27% of the state.

The plan should be recognising, acknowledging and be guided by the contemporary work and research that the University of Tasmania has been carrying out on fallow deer population growth and potential spread.

- Research undertaken through the University of Tasmania indicate that fallow deer may occupy 56% of Tasmania based on climate and habitat modelling and the population is growing at 11.5% a year despite hunting. That means there may be 1 million feral deer in Tasmania by 2050 without significant intervention¹.

² Response to the Legislative Council Government Administration Committee “A” Inquiry and Report on Wild Fallow Deer in Tasmania November 2017

³ Legislative Council Report of Wild fallow Deer 2017

- It is odd that this work isn't referenced in the plan as the Tasmanian government stated in 2017 that "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 to complement the state-wide census"⁴.

The plan should put in place a realistic policy that reduces and contains the population of feral deer in Tasmania to 10,000 by 2032.

- Reducing the population to 10,000 and containing them to the Midlands area is entirely feasible and continues to provide ample opportunity for recreational hunting⁵.
- This would then be subject to review based on scientific analysis of impacts

5. Recognise the impact of feral deer on natural and cultural values

In recognition of the outstanding biodiversity and cultural heritage values of Tasmania the plan must include goals and objectives specific to the protection and conservation of natural and cultural values from the threat of feral deer.

- The plan includes social and population goals but they are vague and not targeted at the protection and conservation of natural and cultural values.
- There is no mention of the impact of feral deer on important biodiversity assets in Zone 1 such as the Midlands Biodiversity Hotspot.

6. Stop hindering landowners wanting to control feral deer

Landowners shouldn't have to rely on agreements with hunters or one off permits to effectively control deer on their own land in the Zone 1 sustainable hunting zone. They must be able to control feral deer as they see fit for their circumstance, including for conservation purposes.

- In the Sustainable Hunting Zone farmers and other landowners will continue to be constrained around managing deer on their properties in line with quality deer management policy. This includes significant take limits and seasonal exclusions for controlling deer on their properties unless they develop a Property-based Wildlife Management Plan that is agreed to by hunters. If that is not achievable, a one off permit may be granted for a limited time for less restrictive control based on an assessment by the department.
- Crop protection permits still only refer to permits for impact on agriculture and forestry and aligned with QDM. There is no mention of the availability of permits needed in Zone 1 to manage biodiversity values or environmental restoration on private land. Many property owners need to control deer for biodiversity protection and restoration and for carbon farming enterprises.
- We believe that removal of all landowner restrictions will greatly lower the costs of control to landowners and not remove future hunting opportunities on other properties in Zone 1.

⁴ Response to the Legislative Council Government Administration Committee "A" Inquiry and Report on Wild Fallow Deer in Tasmania November 2017

⁵ Feral Deer Control: A Strategy for Tasmania. Invasive Species Council. August 2021

7. Promote the use of professional pest controllers

The plan must re-enforce that the use of professional pest controllers undertaking aerial and ground shooting and trapping must be part of the range of methods utilised to eradicate feral deer from the “no deer” zone and bring down the numbers in other zones.

- Research shows consistently that professional pest controllers carrying out properly planned programs is by far the most efficient and effective control method for deer.
- Research also shows consistently aerial culling can have the lowest negative animal welfare impacts of all lethal control methods and is the most effective in rugged and inaccessible environments.
- If research and regulatory approvals provide for the use of baits in the future, the plan should encourage their deployment.

8. Community outreach

The plan must re-enforce support for improved community involvement, education and awareness of deer management and the threats of feral deer to Tasmania’s precious environment and economy, to gain social licence for control methods.

- Removal of the partially protected status will help build community acceptance for control.

9. The time to act is now

The plan should be implemented immediately with significant additional funding allocated to the control program to ensure the feral deer population is rapidly reduced.

- The ISC estimates that the cost of effectively controlling feral deer in Tasmania would be \$1.8 million annually. This is in the order of 2% of the \$100 million a year it is likely feral deer already cost the community and economy annually⁶.

10. Improve governance

The feral deer control program is complex and should be managed by a broadly representative task force working under Biosecurity Tasmania.

- Feral deer are now a serious biosecurity issue for Tasmania and have grown well beyond being a game issue to be managed by Game Services Tasmania (GST). For this reason, the deer control program should be managed by Biosecurity Tasmania in conjunction with GST.
- The ISC Feral Deer Control Strategy for Tasmania provides further details about our preferred governance arrangements⁶.

⁶ Feral Deer Control: A Strategy for Tasmania. Invasive Species Council. August 2021.

Conclusion

The Draft Tasmanian Wild Fallow Deer Management Plan 2021 is a step in the right direction to recognise the serious situation that is evolving in Tasmania with the exploding population and impact of feral deer that has occurred under existing hunting orientated policies. There are some positive proposals such as establishing a zoning scheme to include a no deer zone. This is a sensible and contemporary approach to developing a plan for a serious invasive species.

Nevertheless, the plan doesn't go far enough and is still pandering to hunter interests at the expense of farmers, nature and community safety and amenity. While there are some good ideas, the plan clearly lacks ambition, targets and commitment and will continue to hinder landowners trying to control feral deer in the Midlands and Highlands and will fail to stop the spread of feral deer in Tasmania.

The ISC is firm in the view that continuing to protect feral deer for game while the population is exploding in number and area is quite bizarre and exasperates landowners. This isn't an anti-hunting position, far from it, it's just reality. It is clear from other states that deregulating deer hasn't negatively affected hunting opportunities.

Of great concern is the draft plan continuing to sanction the presence of feral deer in parts of the TWWHA and other national parks and not having an adequate buffer. This has come as a surprise as we expected as a minimum standard feral deer would be excluded from the TWWHA and other areas of conservation significance. This is consistent with the Tasmanian government's stated support in response to such a recommendation in the final report of the parliamentary inquiry into fallow deer in Tasmania. It is therefore hard to understand why these areas are not wholly classed as no deer areas given the Tasmanian government's own stated position, their outstanding biodiversity and cultural values and minimal value to hunters. The ISC would expect the Tasmanian Government will wisely correct this in the final plan.

Thank you for the opportunity to comment on the Draft Tasmanian Wild Fallow Deer Management Plan. The ISC has invested heavily in trying to guide a sensible and realistic way forward for control of feral deer in Tasmania. We did this as we believe that while the problem is serious, a costly economic and environmental disaster can be avoided if well planned action is taken now.

I hope you find our feedback and comments constructive and helpful.

If you would like to discuss this submission please contact Peter Jacobs, ISC Deer Project Officer on 0487 295 198 or peterj@invasives.org.au