



Draft Feral Deer
Management Strategy 2022-2027
Queensland.

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 Queensland Government to provide comment on the Feral Deer Management Strategy 2022-27: Draft for consultation.

The Invasive Species Council (ISC) welcomes the development of a new Feral Deer Management Strategy to replace the Feral Deer Management Strategy 2013-18. The 2013-2018 strategy clearly failed to stem the spread and population of feral deer in Queensland. Indeed the feral deer distribution map 2014/18 indicates deer have spread considerably since 2008.

The largely unchecked increase in population and spread of feral deer in Queensland is alarming, albeit there have been some ambitious local deer control programs in SE Queensland. If considerable action is not taken soon this will have dire consequences for the environment, economy and community as demonstrated in other eastern states of Australia. A recent study of the economic, social and environmental cost of feral deer in Victoria showed that based on just a few limited economic factors, the cost of the impact of feral deer could be over \$2 billion over the next 30 years of nothing further is done¹.

The ISC welcomes the fact that feral deer are considered a restricted invasive biosecurity matter under the Biosecurity Act 2014 (i.e. a pest) in Queensland. Nevertheless, simply saying landowners have a general biosecurity obligation (GBO) and are responsible for managing risks from feral deer that are under their control and that local governments need to consider feral deer control in their biosecurity plans is not enough.

These actions clearly need to be underpinned by a state-wide strategy that takes a biosecurity area-based approach by identifying values most at risk from feral deer and priority areas for prevention, eradication and containment and control.

While the draft Feral Deer Management Strategy 2022-27 presents the importance of taking a landscape scale approach to feral deer control, it fails to provide any strategic direction in this regard and leaves to others to determine what that means.

¹ [Counting the Doe: The Economic, Social & Environmental Cost of Feral Deer in Victoria](#)

There is now an urgent need for the Queensland Government and DAF to take more leadership on the control of feral deer population and impacts. A biosecurity area-based approach is needed for managing feral deer that gives guidance on values under most threat and direction on priorities for landowners, local government and NRM groups. This will be an essential start to contain and reduce the feral deer over time.

Supporting Principles

There are a number of positive principles in the draft Feral Deer Management Strategy 2022-27 that the ISC welcomes and supports. These include:

Feral deer populations are strategically managed using best practice feral deer management informed by research.

There is no question this is a worthy goal but the plan fails to present a strategic approach and while further research is welcomed, this must not delay with getting on with control.

Partnerships, planning and collaboration.

Forming partnerships and collaboration are key to planning and delivering successful invasive species control programs but this needs leadership and the plan is unclear on who will lead this.

Awareness, understanding and capability.

Raising awareness on the impact of feral deer and advice on how this can be dealt with both at scale and locally is also a crucial element of successful invasive species control programs so this is fully supported. It appears that in some parts of Queensland this is less understood.

Referring to “Feral” Deer is correct.

By definition, a feral animal is one that lives in the wild, is uncontrolled, and of a species that is not indigenous to the area. (as opposed to a wild animal which is native to the area and living in their natural wild state). The term feral deer correctly describes uncontrolled introduced deer living in the wild. There is a campaign by some to romanticise feral deer and undervalue their impacts by referring to them as “wild” not “feral”. This devalues Australia’s unique biodiversity and is clearly incorrect. We support your continued use of the term feral to describe uncontrolled deer.

Control Methods.

The ISC welcomes the acknowledgement that a range of control methods need to be made available and used for specific circumstances including aerial shooting and trapping. We would add though that it should be re-enforced that the most efficient and humane control is by professional deer shooters particularly where specific objectives are required to be met.

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. Hunters may remove deer and assist properly planned programs, but their recreation objectives are not aligned with a biosecurity approach.

Nevertheless, the ISC has a number of key issues and concerns with the Draft Feral Deer Management Strategy 2022-2027 and puts forward recommendations to be considered for the final plan.

Key Concerns and Recommendations

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

An area based biosecurity approach to invasive species control is needed

The draft strategy lacks a clear area based approach for managing feral deer across the vast Queensland landscape and we are concerned that without that, the approach will continue to be disconnected and not strategic.

Section 22 of the *Biosecurity Act 2014* cites restricted matter criteria (of which feral deer are restricted matter) being where there are reasonable grounds to believe that, if restrictions under this Act are not imposed on the biosecurity matter to reduce, control or contain it, it may have an adverse effect on a biosecurity consideration.

The ISC believes that consideration of the modelled Invasive Species Curve provides a good basis for addressing this criteria and for the development of a state-wide strategy through managing by area based objectives.

Key to this is identifying areas with different deer management objectives for:

1. **Preventing** deer establishing in areas they don't currently occupy (highest priority);
2. **Eradicating** small and isolated populations and those that impact most on values;
3. **Containing** feral deer to identified areas while resources are limited; and
4. **Protecting assets** within those containment areas to protect high value assets be they environmental or economic.

The ISC believes that it is quite achievable for DAF to map and zone these objective based areas across Queensland in the strategy. This will give clear guidance to landowners, NRM groups and LGA's as to what they should be aiming for and something to measure against. This will also provide a sound basis for seeking targeted funding.

In June 2021, the ISC released a strategy for managing feral deer in Tasmania. It incorporated this area based objectives approach. The plan can be accessed here².

Consequently the Tasmanian Government released its Wild Fallow Deer Management Plan which utilised their version of this approach to include zones, including a no deer zone. We would encourage you to have a look at these strategies to consider how a similar approach might be applied to Queensland. This approach will also align with what is expected to be in the draft National Feral Deer Action Plan.

Be ambitious: Set some targets

The draft strategy has some constructive principles but is short on ambition, suggesting a status quo approach that has in the past failed to curb the rising impact of feral deer. The strategy should tackle the rising feral deer population in Queensland by putting in place clear population and impact reduction policies aligned with a realistic policy of prevention and eradication targets that reduces and contains the population of feral deer in Queensland. This would then be subject to review based on scientific analysis of impacts. The plan should also commit to seeking funding to enable those targets to be met.

² <https://invasives.org.au/publications/feral-deer-control-a-strategy-for-tasmania/>

Leadership and governance for implementation

The draft strategy states that it is “to assist stakeholders to understand their role in managing feral deer and reducing impacts”. The actions list includes a range of stakeholders but who is leading is unclear.

An as example: Action: 2.5 *Encourage a landscape level approach to feral deer management*. By who? *all stakeholders*. This is quite vague and hard to understand how this will happen without leadership.

Under implementation, the strategy says:

“Feral deer management is a shared responsibility amongst land managers, including private and public land managers, the agricultural sector, commercial deer industry, hunting organisations, recreational and commercial hunters, community groups, all levels of government, and the community. A shared commitment to action by all stakeholders is central to success”. This is true of course but what’s missing is who has the leadership role.

“Planning at property, local government and regional levels is the first step in implementation”. The ISC believes that contrary to this, the first step is having a clear State-wide position on area based objectives and priorities that then inform planning for implementation at a regional and local level, otherwise planning is fragmented.

The ISC believes that DAF (or another government department) needs to be taking a leadership and aspirational role with a broadly representative task force to secure funding and facilitate the actions in the strategy. Otherwise progress is likely to be slow at best.

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

There are outstanding biodiversity and cultural heritage values inherent in Queensland, yet there is little mention of the impact of feral deer on these values. For example, there is no mention of the impact of feral deer on the Wet Tropics World Heritage Area or national parks and conservation areas. The strategy must include goals and objectives specific to the protection and conservation of natural and cultural values from the threats of feral deer.

Need professional pest controllers.

The plan must re-enforce that the use of professional deer controllers undertaking aerial and ground shooting and trapping must be part of the range of methods utilised where eradication and intense control is required.

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 strategically and rapidly reduced.

Conclusion

The Draft Feral Deer Management Strategy 2022-2027 is a step in the right direction to recognise the serious situation that is evolving in Queensland with a largely unchecked population of feral deer and the impact that they are having on the economy, the community and the environment.

There are some positive principles in the plan but the document is vague on strategy and desired outcomes. The draft strategy lacks ambition, targets, commitment and leadership; all qualities that will be required if Queensland is to start to drive down the population, significantly reduce impacts and avoid being where other eastern states are now with feral deer.

The ISC believes that with commitment and good planning, Queensland is in a position to stem the growth of the feral deer population and start to drive it down in size and area. We believe that while the problem is serious, a costly economic and environmental disaster can be avoided if well planned action is taken now.

Thank you for the opportunity to comment on the Draft Feral Deer Management Strategy 2022-2027. The ISC hopes 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