

Tasmanian Wild Fallow Deer
Management Plan 2022-2027
Annual Review - Stakeholder
Consultation Paper

Submission by 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 comments on the annual review of the Tasmanian Wild Fallow Deer Management Plan and Implementation Strategy. The Invasive Species Council (ISC) welcomes the opportunity to provide feedback.

This feedback has been informed by consultation with key stakeholders in feral deer management, including several key landowners in Zone 1, 2, and 3, as well as other impacted stakeholder groups including the East Coast Primary Producers and the Bruny Island Environment Network.

The release of the 2022 Tasmanian Wild Fallow Deer Management Plan and Implementation Strategy was a step in the right direction. However, ISC noted several shortfalls in the Management Plan, as were noted in our submission to the draft Management Plan. These shortfalls have placed significant limitations on the Plan and resulted in little achievement to date.

While there have been some notable positive steps towards better management of feral deer to reduce the negative impacts on the environment, industry, and public safety, the actions under the Plan and Strategy remain woefully below what is needed. This is in part to limited resources and personnel as well as the constraints relating to the continued protection of feral deer.

For the Plan to be successful in mitigating the negative impacts of feral deer on the environment, economy, and public safety, ISC recommends the following being implemented for 2024.

Recommendations

- 1. Commit to at least \$8 million for feral deer control over the next 4 years**
- 2. Commence control programs on satellite populations where eradication is still possible. This includes Bruny Island, King Island, the Tasman Peninsula, and isolated populations in the northwest and east coast.**
- 3. Appoint six regional feral deer coordinators to work with landholders and the community**
- 4. Ensure stronger enforcement of deer farming regulations to prevent reinvasion or new populations of deer**
- 5. Maintain the commitment to eradicate deer from the Tasmanian Wilderness World Heritage Area and ensure no new populations are allowed to establish**
- 6. Remove the legal protection of feral deer under the Tasmanian Wildlife Act, thereby lifting limitations on deer population control**
- 7. Hold an impacted stakeholder roundtable to understand the costs to and management recommendations of key groups including road users, farming and forestry, Landcare, NRM, private land conservancies and other environment groups, National Parks, local councils, scientists and tourism operators.**
- 8. Undertake a comprehensive study of the costs of feral deer to the Tasmanian economy.**

Feedback on the Plan to Date

1. There have been some important achievements under the Plan.

These include:

- The aerial cull trial in the Tasmanian World Heritage Area (TWWHA) has been a vital step towards eradicating feral deer from the TWWHA as well as developing the capacity and social license to use aerial culling where appropriate.
- The commencement of a control program on the Tasman Peninsula with the initial population estimate complete.
- The addition of the Special Purpose Wildlife Permits and the Emergency Property Protection Permits have greatly improved Zone 1 landowners' ability to manage deer on their land.

2. The Management Plan has not been effective in reducing either the numbers or geographic spread of feral deer.

This is because the level of on-the-ground activity that has occurred to date has been well below what is required for the Plan to achieve the stated objectives.

Anecdotally from landowners and managers around Tasmania, there is little evidence that the deer populations have declined since the commencement of the Plan in 2022. Population growth rates may have been slowed in some areas but the population appears to be growing in numbers and distribution. Unless annual population removals in an area are greater than the population growth rate of about 35-50% per year, then deer control will not achieve reductions in the number of deer. This level of removal has not been achieved outside the TWWHA.

3. A primary reason for limited action is the lack of personnel and resourcing in the Department to carry out the actions outlined in the Plan and Strategy.

Despite calls for the initiation of programs in several areas, such as Bruny Island, Tasman Peninsula, East Coast Tasmania, and around Launceston, Games Services has been unable to undertake programs beyond the initial camera trap survey on the Tasman Peninsula due to limited resourcing.

4. For the Plan to achieve its objectives, on-the-ground control programs need to be started in priority areas and local coordinators should be appointed.

It is critical that more resources are allocated to initiating on-the-ground deer control programs in priority areas, including King Island, Bruny Island, and national parks on the East Coast. The upfront costs of initiating control programs will be far outweighed by the avoided costs to the economy of not controlling feral deer populations.

The recent advertisement of two regional deer control officers is a much-needed step towards expanding deer control capacity. However, given how vital local coordinators are to the success of deer control programs, two officers will not be sufficient. For the Management Plan to be successful, it is vital that the Department employs at least an additional four deer field officers.

5. There is an urgent need for more intensive programs that include professional ground shooting and aerial culling to increase the rate of culling to the level that is required to reduce populations of feral deer.

Given the success of the aerial cull program in the Walls of Jerusalem, the aerial cull program should be expanded to appropriate areas, including on King Island with an aim of eradication, and in the Midlands to rapidly decrease the feral deer population to a more manageable level for landowners.

6. The allowance of deer farms in the 'no deer zone' undermines the Management Plan.

Deer farms present a serious risk of reinvasion for areas where deer eradication is the goal. For example, Bruny Island and the Tasman Peninsula both have active deer farms/hobby farms with deer. The Tasmanian government needs to urgently enforce the 2022 Deer Farm regulations and should furthermore ban all new deer farms from Zone 3.

7. The permitting system still places a heavy and unnecessary administrative burden on landowners and managers, hindering effective management.

The addition of the Special Purpose Wildlife Permits (SPWP) and the Emergency Property Protection Permits (EPPP) have been positive and vital developments that have greatly improved Zone 1 landowners' ability to manage deer on their land. In particular, the SPWP has been critical for the management of feral deer and feedback has been positive regarding Game Services' open discussion and guidance throughout the introduction of the SPWP.

While the SPWP is an important improvement from the previous situation, landowners' and land managers' efforts to control feral deer to minimise their impact on agriculture, biodiversity, ecological restoration, and amenities continue to be hindered under the Plan by red tape and permits.

The lag time between deer damaging crops and infrastructure, and being able to demonstrate sufficient damage to apply for and then receive those permits allows for significant damage to accumulate in that time.

8. Due to the administrative burdens of the current permitting system, landowners and managers in Zone 1 and 2 are culling deer without applying for permits.

The Invasive Species Council is aware of anecdotal reports that, due to the administrative and practical burdens of applying for permits, many landowners are culling deer without applying for permits to prevent the immediate and substantial impacts they are observing on their property.

This renders the permitting system pointless and also yields inaccurate reported take values. Given this, it is even more pertinent that the permitting restriction be lifted.

9. SPWPs should be 5-year permits and the criteria should be expanded to include all habitat for threatened species.

As an immediate action to improve the management of feral deer and conservation outcomes, the SPWP should be a 5-year permit, like property protection permits (PPP). Yearly review of goals and results can occur without the need to issue a new permit. This will avoid the administrative burdens of reapplying for permits each year.

Furthermore, SPWP should apply for any woody native vegetation where deer are impacting the regeneration of young trees and shrubs (not just threatened species or threatened communities) so that all vegetation communities that provide important habitat for threatened species can be protected.

10. The requirement for male tags should be removed for Zone 1.

This would be an important immediate improvement to the current system. This expensive and laborious burden exists solely for the benefit of trophy hunters, who have minimal impact on deer population management compared to hunters shooting for meat and/or population reduction.

11. All limitations on deer control (seasons, bag limits, tagging, etc) should be lifted until the Plan is successful in eradicating deer from the no-deer Zone and the deer population in the sustainable hunting zone has been reduced to a more manageable population level.

Lifting these administrative and practical barriers will allow for more effective management by increasing the rate of culling, while still retaining ample hunting opportunities.

12. There will continue to be unnecessary administrative hurdles and ineffective control as long as feral deer are a protected species.

Effective management across the state will be difficult, if not impossible, to achieve with the ongoing partly protected status. Since feral deer are not a declared pest species, there are no obligations for landowners to manage deer, meaning the efforts of those landowners attempting to manage deer in line with the Management Plan are rendered futile if their neighbours refuse to participate in management efforts as well.

Until this is rectified, the Plan will not achieve the stated goal of effectively managing the impacts of feral deer.

This is a particularly alarming issue in Zone 3, the so-called 'no-deer zone'. 'No deer' will never be achieved if landowners can, as is stated in the consultation paper, choose to maintain feral deer on their property ("One Zone 2/3 property chose to continue to operate under a Zone 1 permit at the discretion of the property owner. It must be noted that should the landowner wish to maintain a herd in Zone 2 or 3 they can choose how the deer are managed on their land and can determine how and when deer are shot.")

Allowing for deer refuges on private land renders all efforts to eradicate deer in priority areas, such as Bruny Island, futile. This needs to be rectified if the Plan is to achieve its 'no deer zone'.

13. The full costs of feral deer to the Tasmanian economy, environment and impacted groups should be assessed.

A comprehensive assessment of the economic benefits of recreational hunting has been completed. However, a comprehensive assessment of the economic impact of the feral deer population has not been conducted, even though feral deer are a huge cost burden on the Tasmanian economy and environment. We expect that this assessment would clearly demonstrate that investment in increased feral deer control will positively benefit the economy and environment.

The economic and environmental impacts of feral deer include:

- Destruction of crops and saplings, soil erosion, and damage to infrastructure.
- They are one of Tasmania's worst emerging environmental threats. As they spread into new areas, like our World Heritage Wilderness or the Freycinet Peninsula, they trample plants, ring-bark young trees, spread weeds and damage stream banks.
- Increasing the cost of revegetation and conservation efforts. It now costs about \$30 to protect a single planting from feral deer. This is almost 10 times higher than the amount allocated in grants awarded using public funds for biodiversity protection.

- Risks to road safety. Feral deer are causing more road crashes, risking lives and increasing insurance costs. Between 2013 and 2021, 68 deer-vehicle collisions were recorded, with more being recorded elsewhere or unrecorded.

The South Australian government has recently released a detailed 10-year [plan to eradicate feral deer](#) from their state due to the unacceptable cost to agriculture, road users, infrastructure and the environment. That government study found that feral deer will cost the South Australian economy half a billion dollars in a decade if they are not controlled.

A 2022 [economic report by Frontier Economics](#) found the total costs of feral deer to the Victorian economy could reach \$1.5 billion and \$2.2 billion over the next 30 years.

Concluding remarks

The level of action needed to achieve the objectives of the Plan and protect the Tasmanian environment, economy, and public from the negative impacts of the growing population of feral deer has been woefully below what is needed. A serious barrier to effective management is the continued over-prioritisation of recreational hunting interests, under-engagement with other impacted stakeholders, and an over-reliance on recreational hunters for culling activities.

What is urgently needed is coordinated, targeted, and well-resourced programs around the state.

It should be noted that effective deer management will not undermine recreational hunting. Removing satellite populations of deer and reducing the population of deer in the Midlands regions will still allow for ample hunting opportunities but will have the benefit of relieving the growing environmental, economic, and emotional burden of feral deer for the rest of the Tasmanian community.