

DISCUSSION PAPER

# Policy and Regulatory Issues in Treating Feral Deer in Victoria as a Vertebrate Pest Animal

DECEMBER 2025

<b>Introduction</b>	<b>2</b>
<b>Summary</b>	<b>2</b>
<b>Conclusion</b>	<b>4</b>
<b>Background, questions and answers</b>	<b>6</b>
<i>Feral deer are protected alien wildlife in Victoria</i>	6
<i>A pest animal: A more appropriate and fitting status for feral deer</i>	9
<i>What is the impact on deer hunting opportunities if feral deer aren't protected and classified game?</i>	9
<i>Will declaring feral deer a pest put obligations on land owners and managers?</i>	12
<b>Appendix 1: Alternative potential regulatory control if the game status of feral deer ceases</b>	<b>13</b>

## Introduction

A few deer were released in Victoria 150 years ago for game hunting and over time legislation was developed to support the hunting resource and promote deer in landscape. The activities of hunters have not controlled deer numbers and with no natural predators, deer are now a large uncontained and uncontrolled feral population. Nevertheless, deer continue to be protected under Victoria's Wildlife Act 1975 for game purposes.

The evidence of social, environmental and economic impacts from increasing densities and areas occupied by feral deer species is now well established in Victoria. The broader community is now well aware of these impacts and view feral deer as a serious vertebrate pest animal and not an asset. As such, there is a strong view in the community, particularly land managers and farmers whose productivity is impacted, that feral deer have grown to now be a serious pest and should have their wildlife and protected wildlife status removed from Victoria's Wildlife Act 1975 and game status revoked, and consequently deer hunting no longer regulated by the Wildlife (Game) Regulations 2024. This allows deer species to be declared Established Pest Animals under the Catchment and Land Protection Act 1994 (CaLP Act). All other mainland states have now moved to declaring deer as a pest, yet Victoria continues to protect deer while supporting the highest population of feral deer in Australia.

There is an alternative view that deregulating deer as game and declaring deer a pest, may restrict deer hunting activities, lead to unsafe and inhumane practices being carried out by deer hunters and be onerous on land owners. These concerns have not manifested when deer were deregulated in NSW, and where deer have been a declared pest for a long time ( i.e. WA, SA, Qld, ACT, NT) <sup>1</sup>. The suggestion of a new Game Act has been put forward by some as an alternative to the Wildlife Act for regulating feral deer.

### Purpose of this paper

This discussion paper explores the basis and consequences of feral deer being protected wildlife in Victoria and how deer hunting can still be effectively managed should revoking the protected wildlife and game status of feral deer occur and they be declared an established pest animal.

## Summary

The Victorian Government currently has a complicated, confusing and conflicting policy position on feral deer. There is a juxtaposition with feral deer being regarded as a serious vertebrate pest animal with investment in control by private and public land managers, while being afforded legislated, legal protection status by the Victorian government. The community and land managers can well be excused for being confused about the status of deer in Victoria.

---

<sup>1</sup> Landscape South Australia Act 2019; Biosecurity and Agriculture Management Act 2007 (WA); Biosecurity Act 2014 (Qld)

Sustained and major feral deer control programs are needed as feral deer are now increasing their territory and densities at an exponential rate. Any public investment needs to be about ensuring that the economic, social and environmental impacts from alien vertebrate pest animals are reduced on private and public lands.

To achieve effective control across a landscape more than 80% of land needs to be accessible for deer control and 40% of deer need to be removed each year over thousands of hectares, just to keep numbers stable<sup>2</sup>. This will never be achieved while deer remain protected or through recreational hunting alone. Changing feral deer game status to pest status will enable coordinated and collaborative cross boundary efforts across a sufficiently large area for effective control, through neighbours all working together in reducing impacts.

Deregulating feral deer as a game species and declaring feral deer an established pest animal should have no impact on deer hunting opportunities other than removing the significant cost of a game licence for deer, reducing compliance costs, less deer hunting regulatory barriers put there to enhance the game hunting experience and more availability to partner in pest animal control activities. This is the experience when deer were listed in NSW as pest in 2019<sup>3</sup>.

The Invasive Species Council puts forward a position that Wildlife Act protection for deer and game regulation is a hindrance to effective control and not necessary for deer hunting to remain a safe and humane recreation in Victoria. Deer hunting can be managed in the same way hunting is now regulated for other vertebrate pest animals. Existing legislation more than adequately regulates firearms safety, animal welfare, trespass and land access issues for deer hunting.

The dramatic spread of feral deer across the landscape is a national problem. Removal of the protection of feral deer as “wildlife” in Victoria would also be a significant step towards adopting a common national approach to managing this growing problem.

Moreover, a new “game Act” to regulate feral deer hunting would lead to more confusion and costs for land managers and hunters. It is self-evident that the regulation of feral deer hunting under a Game Act in NSW until 2019 failed to reduce densities and contain populations in NSW.

In regard to changes to the regulatory status of deer from protected wildlife to established pest animal:

1. Regulation of deer hunting in the Wildlife (Game) Regulations 2024 is related to game management and protecting the “fair chase and challenge of the hunt”. Should feral deer be declared a pest animal as opposed to a game animal, these regulations become unnecessary or irrelevant.

---

<sup>2</sup> Annelise Weibkin, National Deer Management Co-ordinator pers comm.

<sup>3</sup> Annelise Weibkin, National Deer Management Co-ordinator pers comm.

2. Should feral deer be declared an established pest animal, most controls related to feral deer welfare that are currently in the Wildlife (Game) Regulations 2024 are then more appropriately regulated under the Protection of Cruelty to Animals Act (POCTA) and Regulations and where necessary strengthening the Code of Practice for the Welfare of Animals in Hunting, established under Section 7 the POCTA Act. Many of these controls already exist in the POCTA code and regulations as they apply to other vertebrate pest animals.
3. Issues with firearm safety and licensing related to pest animal control are importantly regulated and managed under the Firearms Act not Game Regulations. VicPol is empowered, well-resourced and the proper authority to deal with any violations of the Firearms Act and Regulations.
4. Areas where feral deer hunting is currently not permitted or hunting with hounds is permitted, are most appropriately managed within the existing legislation and powers of the relevant land manager to control activities as it is now the case in parks and reserves.
5. If feral deer are declared Established Pest Animals under the CaLP Act they can continue to be hunted in areas of State forest and unreserved Crown Land where hunting of pest animals is allowed, in accordance with current laws.
6. Deer hunting can continue to be authorised in parks and reserves where it is currently permitted under Sec 37 of the National Parks Act 1975; they don't need to be game for this to occur. It will need an adjustment to the current Order In Council that refers to game.
7. The economic, environmental and community benefits to public and private land managers of collaborative control efforts to reduce the significant impact of feral deer will be significant. It is in everyone's interest to control pests collaboratively.

## Conclusion

It is a historical anomaly and an anachronism to protect a species which is a feral pest causing significant economic and environmental harm, in the same way as our native wildlife. The Department of Energy Environment and Climate Action states<sup>4</sup>:

- In Victoria, deer are impacting our state's biodiversity, water quality, public safety, agriculture, and Aboriginal cultural heritage.
- The Victorian Deer Control Program (the Program) aims to minimise the impact of deer in Victoria.
- The Program includes the Victorian Deer Control Strategy (the Strategy) and 3 regional deer control plans.
- The Strategy was released in 2020 as the first step toward providing a clear and coordinated approach to deer control in Victoria.
- Deer cause significant environmental damage through spreading weeds, grazing, tree rubbing, trampling and forming wallows in drainage lines resulting in soil

---

<sup>4</sup> <https://www.environment.vic.gov.au/invasive-plants-and-animals/deer-control-program>

erosion and compaction. This can increase pressure on native wildlife, threatened species and plant communities that are vulnerable.

- Sambar deer are listed as a potentially threatening process under the Flora and Fauna Guarantee Act 1988, by reducing the biodiversity of native vegetation.
- Deer are herbivores and create grazing pressure within different ecosystems that affect a wide range of native wildlife.

The Department is fighting with one arm tied behind its back while deer are treated as “wildlife”.

In order for a species to be declared as an established pest, s.67 of the Catchment and Land Protection Act 1994 requires that,

(a) it is established in the wild in Victoria; and

(b) it is a serious threat to primary production, Crown land, the environment or community health in Victoria; and

(c) it should be eradicated or controlled or its spread in the wild should be prevented.

Those pre-conditions are clearly met.

If declared a pest, it will still be available for hunting, but there will also be a general duty on landowners under s.20 of the Act to:

(f) prevent the spread of, and as far as possible eradicate, established pest animals.

This general duty is now also reflected in NSW, a duty which reinforces the concept of invasive species management as a shared responsibility for all community members<sup>5</sup>. There is no obligation to eradicate deer placed on landholders and managers, beyond the general biosecurity duty. Nor would there be such a duty in Victoria.

The conflicting legal status of feral deer in Victoria makes it more difficult for the community to appreciate the serious impact of feral deer and to have in place effective feral deer eradication, containment and control programs. Being declared an established pest animal will make the position on feral deer in Victoria much clearer for the community and land managers and reflect reality as we move to seriously control the impact of what has become a serious pest.

Removing the protected and game status of deer and declaring deer as an Established Pest Animal is unlikely to have impact on deer hunting opportunities, community safety or animal welfare in Victoria, should any necessary adjustments be made to the existing controls under the POCTA Act and Regulations, the Code of Practice for the Welfare of Animals in Hunting and land manager controls as outlined below.

---

<sup>5</sup> S.22 Biosecurity Act 2015

## Background, questions and answers

### Feral deer are protected alien wildlife in Victoria

Deer were introduced into Victoria in the 1860's by acclimatization societies for game hunting, along with rabbits and foxes. That acknowledgement of deer as being part of our natural environment and managed primarily as a game species has continued since through legislation.

The Wildlife Act (Sec 3) defines "wildlife" to mean, *inter alia*, non-indigenous animals such as all kinds of deer. Moreover, deer are defined as "protected wildlife" because they are not a pest animal within the meaning of the CaLP Act. As such, Hog, Red, Sambar, Fallow, Rusa, Chital, Sika and Wapiti Deer are protected wildlife under the Wildlife Act 1975. Hog, Red, Sambar, Fallow, Rusa and Chital Deer are further defined by the Governor in Council to be protected as "game" which means they can be hunted by licensed game hunters. Deer hunting is regulated under the Wildlife (Game) Regulations 2024. All other species of deer that are not currently in Australia are declared as prohibited pest animals under the (CaLP Act).

### Why are feral deer protected wildlife?

This is a legacy of the past practice of acclimatizing introduced alien animals into the Australian landscape and when deer numbers were small and a curiosity. The Game Management Authority continue to endorse that position stating that "deer are appreciated for their aesthetics and are a valued hunting resource". Moreover, the objectives of the Australian Deer Association which advocates for their protection include: "The improvement of the status of deer in Australia" and "the retention and improvement of habitat for deer....". This is presumably why deer have been seen by some to be needed to be protected.

### Should feral deer remain protected wildlife?

A few deer released 150 years ago have now become a large uncontained and uncontrolled feral population that now occupy vast areas of Victoria from the coast to our highest mountains including virtually all our national parks. These large hard hoofed animals are unlike any species of Australian wildlife that our ecosystems have evolved with, so the consequences of this invasion are dire.

Feral deer in the wild are now considered feral as they were deliberately introduced to Australia for domestic purposes and are now spreading uncontrolled and uncontained, having serious impacts across the landscape.

There are estimated to be around 1 million feral deer in Victoria covering nearly 40% of the State<sup>6</sup> and will occupy the whole of Victoria in time if not controlled. A research project being undertaken by ARI aiming to better inform the population estimates of the feral deer population on public land recorded feral deer presence at 60% of the 317

---

<sup>6</sup> Victorian Deer Control Strategy. DELWP 2020.

monitoring sites across Victoria with feral deer the second most detected animal, only the Black-tailed Wallaby was more common. Densities of over 10 feral deer per square kilometre were recorded in some conservation reserves<sup>7</sup>.

Irrespective of population estimates the impact is the more important consideration. We know the wild population of feral deer is growing and spreading rapidly, causing serious impacts to the environment, agriculture, forestry and community safety.

Frontier Economics have reported that if nothing is done to stop the growth and spread of feral deer in Victoria it will cost the economy up to \$2.2 billion over the next 30 years, not accounting for the impact on biodiversity and the natural environment<sup>8</sup>.

A report on the economic analysis of the impacts of deer in Victoria commissioned by the Victorian Government and carried out by Melbourne University estimates state-wide losses to agriculture, forestry and conservation stemming from feral deer over the next 20 years amounts to \$1.1 billion and could be over \$2 billion. The greatest losses will be borne by impacts on biodiversity where 469 species are exposed to additional extinction risk as a consequence of feral deer in the landscape<sup>9</sup>. Feral deer are also a serious biosecurity risk, having 15 diseases in common with livestock and also some spread to native animals<sup>10</sup>.

Sambar deer are listed as a potentially threatening process under Victoria's Flora and Fauna Guarantee Act 1988 (this is the highest listing) because they pose a significant threat to the survival and evolutionary development of numerous plant taxa and ecological communities.

The Australia Senate enquiry into the Impact of feral deer, pigs and goats in Australia<sup>11</sup> recommended that that all Australian jurisdictions make any necessary changes to their existing legislative and regulatory frameworks to ensure that wild deer are treated as an environmental pest.

Every single tool and necessary effort over sufficient land needs to be used, together with clear state leadership and policy, to have a slim hope of getting on top of deer explosions.<sup>12</sup>

The notion that we need to continue to protect and regulate feral deer for their "aesthetics and as a valued hunting resource" is at odds with the views of many land

---

<sup>7</sup> Citation: J.G. Cally, and D.S.L. Ramsey (2023). Abundance of deer in Victoria: Regional and statewide estimates of deer density and their impact on vegetation. Arthur Rylah Institute for Environmental Research Technical Report Series No. 368. Department of Energy, Environment and Climate Action, Heidelberg, Victoria.

<sup>8</sup> Counting The Doe: The Economic Impact of Feral Deer In Victoria; Frontier Economics' 2022.

<sup>9</sup> Walshe et.al.,. 2023 An economic analysis of the impacts of deer in Victoria. Terry Walshe<sup>1</sup>, Casey Visintin<sup>1</sup>, Dave Ramsey<sup>2</sup>, Tom Kompas<sup>1</sup> and Brendan Wintle<sup>1</sup>. <sup>1</sup> School of Biosciences, University of Melbourne, <sup>2</sup> Arthur Rylah Institute.

<sup>10</sup> Ted Rowley, Chair, National Feral Deer Working Group, pers comm

<sup>11</sup> The Senate: Environment and Communications References Committee Impact of feral deer, pigs and goats in Australia. May 2021.

<sup>12</sup> Annelise Weibkin, National Deer Management Co-ordinator pers comm.



managers who are bearing the burden of tolerating and feeding feral deer for the benefit of hunters. Feral deer are now considered by most in the community to be a pest and in no need for protection any longer.

### The consequences of protecting and regulating feral deer

The feral deer population has grown and spread across Victoria while they have been afforded legal protection for hunters. This has hindered control and led to significant environmental and economic impacts that are well documented elsewhere <sup>13</sup>.

In recognition of these hindrances, rather than remove their protected status, the Victorian Government has had to incrementally put in place a number of bureaucratic work arounds to address these hindrances and protection principles that are in place.

These work arounds include:

- **Deer are now unprotected wildlife on private property:** Order in Council Section 7a Declaration: all deer, except Hog Deer, are unprotected wildlife on private property in the whole of Victoria; and specifies the conditions, limitations and restrictions (2018).
- **Public land managers are now authorised to hunt, take, destroy, dispose of, possess, process and sell deer without the need for a permit (other than Hog Deer outside parks).** Wildlife (control of deer on public land) order no. 1/2022 Order in Council (2022).
- **Deer can be commercially harvested** without the need for a permit on private property and processed in a PrimeSafe licensed meat processing facility for human or pet consumption (2018)

These all have conditions which restrict control and don't allow methods other than shooting. As new tools are being developed as recommended in the National Feral Deer Action Plan (2023), these will still need to go through the Authority to Control Wildlife (ATCW) Permit System. Recent attempts to obtain an ATCW to trap and destroy feral deer impacting on private land in Victoria where shooting was not appropriate, as is a common practice in other states, has been met with regulatory and bureaucratic hurdles from the Office of the Conservation Regulator over a protracted period due to Wildlife Act 1975 conditions.

In the meantime; in recognition of the impact of feral deer the Victorian Government has developed a Deer Control Strategy and Regional Deer Control Plans along with a commitment of 19.25 Million over four years and \$4.4 million on going to control the impacts of deer.

What is left now is a complicated, confused and inconsistent policy position on feral deer in Victoria. There is a juxtaposition of feral deer being regarded a serious pest with government investment in control, while still being afforded legal protection status with

---

<sup>13</sup> [Feral-Deer-A-protected-species-or-a-pest-Invasive-Species-Council.pdf](#)

work arounds in place to resolve these differences. The community can well be excused for being confused about the status of feral deer.

It is a well-accepted principle that to control widespread invasive species such as feral deer, we need a landscape scale and cross tenure approach with access to a range of tools and tactics. This can't occur while some people view feral deer as a protected species while others are trying to deal with a serious pest.

With deer conditionally unprotected on private property, public land managers not needing permits (conditionally) and no bag limits or seasons for deer hunting (all other than Hog Deer) this leaves the question of what is left to protect. It seems that what is left is using the protection status to control the behaviour of hunters, promote the outdated "fair chase" principle of deer hunting and pleasing those that support the principle that deer are a legitimate part of our natural environment.

### A pest animal: A more appropriate and fitting status for feral deer

Due to the number, growth, spread and impact of feral deer in Victoria, it is most appropriate that the deer species that are currently protected in the Wildlife Act 1975 now be classified as "Established Pest Animals" under the CaLP Act 1994. This is already the case for other vertebrate species introduced for game such as red fox, European hare and European rabbit in addition to other vertebrate pests such as feral goat, wild dog, feral cat and feral pig. It is also the position of most States where deer are now a declared pest animal.

### What is the impact on deer hunting opportunities if feral deer aren't protected and classified game?

There would be little if any change to deer hunting opportunities if feral deer are unprotected, not classified as game and declared an established pest animal under the CaLP Act 1994. Some questions asked include:

### Will quality control on endorsed deer hunters be lost if deer aren't regulated as game?

Simply, no. There is currently no test or accreditation needed to obtain a game licence endorsed to hunt deer (excluding hounds). Once a person has the required firearms licence, a Victorian Game Licence with deer endorsement is obtained by simply going on line and registering and paying a substantial fee. There is no quality control for a game licence endorsed for deer.

### Will removing deer from the Wildlife (Game) Regulations 2024 lead to reckless behaviour of hunters and lead to animal welfare issues?

It is an unfair slur on the hunting community to suggest that its members would act recklessly because of a change in protection status. Most of the game regulations for

deer are in place to protect the “fair chase and challenge of the hunt” as a principle of game hunting, not to control firearms use and animal welfare which are matters for all hunters of pest animals. The Firearms Act and Regulations continue to regulate the use of firearms and safety. Animal welfare is managed under the Protection of Cruelty to Animals Act (POCTA) and Regulations and the Code of Practice for the Welfare of Animals in Hunting, established under Section 7 the POCTA Act. Many of these pest animal controls already exist in the POCTA code and regulations as they apply to other pest animals. These can be strengthened if needed, and some conditions of the Wildlife (Game) Regulations 2024 can be transferred to the COP such as animal welfare related controls on scent trailing hounds, gun dogs and deer hunting dogs and projectile sizes for species.

### But will there be enough deer to hunt and protect my hunting experience?

The feral deer population and spread has expanded significantly to be estimated at up to 1 million feral deer covering nearly 40% of the State<sup>14</sup>.

Deer clearly do not need to be protected to provide an adequate resource for hunters as the feral deer population has continued to rise irrespective of hunting. There will be plenty of deer for hunting in the foreseeable future whether or not they are protected as a game species.

According to the Game Management Authority, “one of the key components of ethical hunting (of deer) is the concept of 'fair chase'. This means giving the game a reasonable chance to evade the hunter” and “a true hunter makes every effort to ensure the contest is as fair as possible”. The “fair chase and challenge of the hunt” seems at odds with the hunter experience today where there are large and dense populations of deer. These “game principles” are only about the recreation experience and at odds with effectively reducing the deer population and impacts. While recreational deer hunting can reduce numbers, it is clearly not a control program while deer are considered game.

### If feral deer aren't classified as game could I still get a firearms licence to hunt deer?

To apply for or renew a Category A & B firearms licence the applicant needs be able to demonstrate and maintain a genuine reason for needing a firearm licence. This includes (among other reasons) a current membership card of an Approved Shooting Club or Shooting Organisation that is approved for the activity of hunting or a Registration of Interest for hunting pest animals on Crown land, which was issued by the Department of Energy, Environment and Climate Action (DEECA). The Firearms Act allows for the granting of a firearms licence to destroy declared pest animals listed under the CaLP Act, i.e. established pest animals. Having a Game Licence is not a requirement for a firearms licence.

---

<sup>14</sup> Victorian Deer Control Strategy. DELWP 2020.

### Will I be able to hunt feral deer on State Forest and unreserved Crown Land if they aren't game?

Hunters can currently hunt on state forests and unreserved Crown land for a range of declared established pest animals such as red fox, European hare, feral goat, wild dog, European rabbit and feral pig without any particular endorsement other than a firearms licence.

Some hunters may need to get a Registration of Interest (ROI) to hunt pest animals on Crown land in order to have a genuine reason to obtain a firearm licence and use a firearm with which to hunt pest animals. A ROI certificate currently applies to the hunting of established pest animals declared under the Catchment and Land Protection Act 1994 on Crown land where the hunting of pest animals is permitted. Pest animals can be hunted all year.

This same procedure would be expected to apply to feral deer in State forest and Unreserved Crown land should feral deer be unprotected and declared an established pest animal. There would be no requirement for a game licence to hunt deer in that case.

### Will I be able to hunt feral deer in parks and reserves if they aren't game?

Most national, state, wilderness, coastal and regional parks are closed to hunting at all times. However, deer hunting is allowed in parts of Alpine and Baw Baw National Parks, Tara Range Park and Avon Wilderness under sec 37 3 of the National Parks Act 1973 (NP Act), and as authorised in the Victoria Government Gazette No. S 99 Wednesday 7 March 2018.

Section 37 3 of the NP Act that allows for deer hunting **is not specific to game status**. It states that the Secretary may ... authorize **any class or classes of person** to carry and use any firearms or other weapons or class or classes of firearms or other weapons in the course of hunting deer by stalking in the parks described in .....(lists parks) in such part or parts of the parks for such period or periods and subject to such conditions and restrictions as are specified in the permit or notice.

Importantly, this means that recreational deer hunting could continue to be authorised in these parks aligned with an appropriate class, (such as a member of an Approved Shooting Club or Shooting Organisation that is approved for the activity of hunting or a Registration of Interest for hunting pest animals on Crown land), by a further publication in the Gazette should the government choose to do so.

However, recreational deer hunting is a sport not a control program and is thus largely ineffective in controlling impacts. Furthermore hunting has significant capacity to conflict with the recreational use of these Parks. The preferred and more effective approach for controlling impacts in protected areas would be engaging volunteer shooters in planned control programs aligned with clear objectives through agreements such as the current MOU between Parks Victoria and the SSAA.

## Will declaring feral deer a pest put obligations on land owners and managers?

The GMA states that if deer were declared a pest animal there would be a legal obligation for landowners to control deer on their property which would impose a significant burden for landowners and would divert money and resources away from their core objective of primary production. This is an odd statement suggesting that deer don't impact on primary production. The opposite is indeed the case. Economic impact studies have shown that deer are costing farmers a lot in significant losses of production. Nationally, a recent study found that the cost of feral deer to agriculture is \$69 million annually<sup>15</sup> and Frontier Economics found that over the next 30 years the losses in agriculture in Victoria due to feral deer impacts will be up to \$500 million<sup>16</sup>.

Should landowners and managers and government agencies invest collaboratively in deer control, these costs will bring a significant return on investment. There is little evidence that the presence of currently established pest animals has seen general legal obligations being unreasonably enforced on landowners in Victoria, or in NSW where there is the same general duty under the Biosecurity Act 2015. It is in everyone's interest to control pests collaboratively.

---

<sup>15</sup> McLeod, R. (2023). Annual Costs of Feral Deer in Australia. Report prepared by eSYS Development Pty Ltd, Centre for Invasive Species Solutions, Canberra

<sup>16</sup> Counting the Doe: The Economic Impact of Feral Deer in Victoria; Frontier Economics' 2022.

## Appendix 1: Alternative potential regulatory control if the game status of feral deer ceases

<b>Matter in the Wildlife (Game) Regulations 2024 in relation to recreational deer hunting</b>	<b>Purpose of the Regulation</b>	<b>Alternative regulatory control if needed should feral deer species be declared as Established Pest Animals under the CaLP Act.</b>
Game licence and (Deer) endorsement	To have a record and contacts for deer hunters and raise funds. There is no test or accreditation required.	No requirement for any endorsement to hunt established pest animals apart from a ROI that may be required for some gun owners to hunt pest animals on State Forest.
Spotlighting (including infrared, night vision and thermal imaging) on public land in declared deer habitat.	According to GMA: There is no hunting skill involved in spotlighting deer and the practice is inconsistent with the principle of fair chase i.e. allowing the deer a chance to evade the hunter. It is banned for hunting deer on public land to support fair game principles but allowed on private property where control is the objective.	This is a matter related to game hunter ethics: New technology such as night vision and thermals are very efficient for feral deer control. Spotlighting pest animals is currently allowed in state forest if not in recognised deer habitat. If feral deer are a pest animal there will be no recognised deer habitat and no need to restrict night hunting. If spotlighting a thought to be a safety concern as opposed to a “fair game” matter the same should apply to all night hunting of pest animals in that case and be regulated through the Firearms Act.
Hounds, gun dogs and deer hunting dogs	To regulate the use of scent trailing hounds, gun dogs and deer hunting dogs for deer hunting. Season, areas they can be used, breeds and numbers. Prescribes a test for a Sambar Deer Hunting with Hounds endorsement.	The <i>Code of Practice for the Welfare of Animals in Hunting</i> established under Section 7 the POCTA Act and published in the Government Gazette, already covers use of dogs for hunting in section 4 to some extent. These detailed conditions for dogs for deer hunting can be transferred to requirements under <i>The Code of Practice for the Welfare of Animals in Hunting</i> as regulated under the POCTA Act. The conditions should be reviewed on the basis of best welfare

		practices when hunting pest animals, not for fair chase of game reasons. Areas where hunting of feral deer as a pest animal can be controlled and regulated by the relevant land manager.
--	--	---

Bag Limits and seasons.	There are no bag limits or seasons for deer apart from a season for hound hunting and deer stalking in some parks. (Except for Hog Deer, see below)	Apart from Hog Deer there is no need for any regulation on bag limits or seasons for stalking outside parks. Hound season can be regulated by the land manager as is currently the case for parks and reserves.
Approved firearms for hunting deer.	Sets out minimum requirements for firearms used to shoot deer for animal welfare reasons.	These firearms requirements can be transferred to the <i>Code of Practice for the Welfare of Animals in Hunting</i> established under the POCTA Act.
Use of baits, lures and decoys when hunting game.	Restricts the use of baits, lures and decoys as part of the principles of the fair chase for game.	The <i>Code of Practice for the Welfare of Animals in Hunting</i> established under the POCTA Act is the best place to address this if needed on welfare grounds .
Aircraft and motor vehicles not to be used for hunting game.	To provide for the principle of the fair chase in game.	The Firearms Act is the key legislation for the safe use of firearms for hunting pest animals and any controls on motor vehicles or aircraft for safety in hunting should come through that.
Game alive when recovered.	A person who takes game which is alive when recovered must immediately kill that game.	Already in the <i>Code of Practice for the Welfare of Animals in Hunting</i> established under the POCTA Act.
Storage of game on commercial premises.	To identify where game came from and deal with healthy standards.	Primesafe regulations now cover the commercial use of wild caught deer. These may be adjusted for pest animal status if needed.
Sale of game prohibited unless obtained lawfully.	To prohibit the unauthorised sale of game.	Primesafe regulations cover the commercial use of wild caught deer. These may be adjusted for pest animal status, if needed .
Hog Deer and Hog Deer Tags	To regulate the take of Hog deer. 1 April - 30 April each year, ballots, one male and one female.	Hog Deer should be declared established pest species along with other feral deer species with exceptions on some nominated private and public game reserves around Gippsland Lakes where they could continue to be regulated under the Wildlife (Game) Regulation 2024.



Prohibited deer hunting areas	To restrict deer hunting for public safety purposes.	The hunting of feral deer as a pest animal in these areas can be controlled and regulated by the relevant land manager as necessary.
-------------------------------	--	--