Deer Management Policy Review 2025
Public Consultation

Submission by the
Invasive Species Council

December 2025

Document details

Invasive Species Council, 2025, Submission to Deer Management Policy Review 2025 Public Consultation

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 discussion paper provided regarding proposed changes to deer management in the state. 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 land managers and owners in Zone 1, 2, and 3, and other impacted stakeholder groups.

The latest population estimates indicate that the management policies to date have failed to curb the deer populations, with the latest population survey suggesting numbers have increased by 33% in the past 5 years. Deer have expanded far beyond their traditional range, including the Tasmanian Wilderness World Heritage Area and national parks, with several satellite populations that have established following farm escapes and intentional releases.

Allowing the deer population to continue to grow and spread across the state poses significant threats to Tasmania's environment, agriculture, forestry, tourism, and road safety. Without effective control, Tasmania risks significant ecological, economic, and reputational damage.

While the changes suggested in this discussion paper are small steps in the right direction, these measures constitute more of the same and are simply stopgap measures that will not make a substantial difference in deer numbers or distribution. Tackling Tasmania's deer problem will only be achieved by systemic change based on truly evidence-based, strategic solutions.

Recommendations

To curb Tasmania's feral deer population, the Invasive Species Council recommends that the Tasmanian Government:

1. Lift all restrictions in all deer management zones by declassifying deer as a partly protected species and declaring them a feral species, in line with most other jurisdictions.

2. Scale up funding for feral deer control to at least $8 million over 4 years in the next budget to ensure success. Ensure funding is prioritised to:

    a. Select achievable eradication programs in DMZ3, such as Bruny Island, King Island, and the Tasman Peninsula, with funding and effort frontloaded into the first two years of the program

    b. Leverage progress already made by the peri-urban deer program, ie on Bruny Island and the Tasman Peninsula, and by the Walls of Jerusalem deer control program

    c. Ensure all available and effective tools are used to remove deer. That includes aerial culling, coordinated ground shooting, and trapping.

    d. Seek matching federal funding commitments on programs of national significance (e.g., Bruny Island, World Heritage Area)

3. Maintain commitment to no new deer farms in DMZ 2 & 3 and urgently scale up enforcement of deer farm regulations.

    a. Consider retirement incentives and subsequent management of current deer farms in DMZ 2 & 3.

4. To foster a collaborative approach to feral deer management, hold an impacted stakeholder roundtable that includes representatives from road safety, farming, forestry, Landcare, NRM groups, private land conservancies, other environment groups, National Parks, local councils, scientists, and tourism operators.

Responses to the 2025 Deer Policy Review

The Tasmanian Government's deer policy discussion paper proposes small, stopgap measures that essentially amount to more of the same and will not be sufficient to curtail deer numbers or distribution. While these changes are positive and important initial steps in the right direction, without true commitment and follow through, these measures will fail to make an impact on deer numbers.

To reduce the number of fallow deer, more than 35% of the total population or more than 25% of the female population must be removed annually (Botterill-James, et al., 2025). There is little evidence to suggest that recreational hunting alone can achieve the required removal rates to reduce deer numbers at the population level (Bengsen et al., 2020; Husheer & Tanentzap, 2023; Nugent & Choquenot, 2004).

- Research in Tasmania indicates that recreational hunters typically do not exceed these removal rates, even in areas where there are no restrictions on the number of female deer that can be taken (Comte et al., 2025).
- In NSW, where deer have been declared a pest, hunters take on average about 3 hunting days to kill one animal, and each licensed hunter kills, on average, less than one animal a year (Department of Primary Industries, NSW, 2024).
- In the Gum Lagoon Conservation Park in South Australia, 65 recreational hunters over 4 days were only able to kill 44 deer. For comparison, one professional shooter in a helicopter was able to kill 182 deer in 4 hours (RSPCA, 2018).

Given that more than 35% of the population must be taken to reduce the population, the average take numbers per hunter mean it is unlikely that hunting will reduce deer numbers at the population level. Indeed, 70% of ground shooting programs that rely on recreational or volunteer shooters fail to achieve population reduction targets (Bengsen et al., 2020).

This limited effectiveness has been attributed to:

- Successful invasive species control programs include clear goals and measurable objectives, target removal rates, and accurate monitoring and evaluation against program objectives. Hunting occurs on an ad hoc basis and not necessarily in line with the objectives of control programs (Bengson et al., 2020)
- Hunters have limited geographic reach as they are on foot and tend to focus their efforts in easily accessible areas, like near roads, which deer quickly learn to avoid
- Hunter motivation, preference and skills are highly variable and can misalign with the objectives of population reduction (Bengson et. al., 2020; Comte et al., 2025; Finch et al. 2014; MacMillan and Leitch 2008).
    - For example, hunter interest can decline when deer density declines such that deer become harder to find
    - Some hunter motivation is on harvesting for meat or trophies rather than population reduction and thus may not take deer in line with management objectives (e.g., taking stags and not does)
    - Some hunters are resistant to management due to a perceived threat to their resource or a conflict with their hunting ethic

The fact that recreational hunting has recently been enshrined as the main management tool by the Tasmanian Parliament is concerning, given the scant evidence to support recreational hunting as an effective tool for *reducing* deer numbers, which is widely acknowledged as needed.

What is needed to bring Tasmania's deer numbers is a dramatic scaling up of coordinated efforts that focus on an initial dramatic population knockdown and then consistent, strategic work to maintain removal rates (Bengsen et al. 2023; Comte et al., 2025, Botterill-James et al., 2023). While recreational hunting can support this work, in particular using highly skilled recreational hunters as part of coordinated volunteer shooter programs (NSW NPWS 2025), relying on recreational hunting as the primary management tool will fail to reduce deer numbers across the state.

1. **Response to 'Finalise work required to streamline Zone 1 permits under the Deer Management Plan'**

While simplifying the permitting system and lifting some restrictions on take numbers is a step in the right direction, this alone will not be sufficient to curb deer numbers. Firstly, because needless restrictions will still exist and secondly, simply lifting restrictions does not generally result in enough deer being harvested to *reduce* numbers. A better measure would be to remove all restrictions on deer harvest by removing the partly protected status, followed by strategic and targeted programs to achieve a dramatic initial knockdown in populations.

Evidence from elsewhere in Australia does show that lifting restrictions can increase the number of deer removed. For example, in NSW, the removal of all seasonal restrictions on the number of female deer that can be removed was associated with a two-fold increase in the bimonthly number of deer shot by hunters (Bengsen & Forsyth 2019). However, this measure only *slowed* population growth rates and did not result in declines in the population number. In New Zealand, six decades of unrestricted deer hunting have not resulted in meaningful declines in deer numbers nor improvements to the environment (Husheer & Tanentzap, 2023).

To reduce the number of fallow deer, more than 35% of the total population or more than 25% of the female population must be removed annually (Botterill-James et al., 2024). Research in Tasmania indicates that recreational hunters typically do not exceed these removal rates, even when there are no restrictions on the number of female deer that can be taken (Comte et al., 2025). Thus, the removal of restrictions must be coupled with strategic, targeted and resourced control programs.

While recognising that streamlining permits alone won't result in meaningful population declines, lifting the overly burdensome and complex restrictions that govern deer management on private land is an important initial step. The improvements outlined in the discussion paper are positive but do not go far enough. There is no need to retain any restrictions on deer takes. In other states where all restrictions on deer hunting have been removed, such as NSW and Queensland, take numbers have still not resulted in sufficient removal rates to reduce populations. Additionally, in these states, there remain ample, if not more, hunting opportunities.

As long as deer are partly protected in regions, effective management across the state will be difficult, if not impossible, to achieve. 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 Deer Plan are rendered futile if their neighbours refuse to participate in management efforts as well.

2. Response to ‘Make Zone 3 a complete eradication zone’

Stating an eradication goal is not the same as funding or implementing one. This change in the stated objective for DMZ3 is welcomed and an important first step, but it will only be meaningful if there is subsequent action to support this.
It is unclear whether this proposal means landowners will be obligated to manage deer on their property or whether landowners will continue to be allowed to choose to maintain deer on their properties in DMZ3, as seems to be the current case. For example, from the last consultation paper: "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." Deer eradication will never be achieved if landowners can continue to choose to maintain feral deer on their property in the ‘deer eradication zone’. Without obligations for landowners to manage down deer, the efforts of those landowners attempting to eradicate deer in line with the Management Plan are rendered futile if their neighbours refuse to participate in management efforts as well.

Many of the deer populations in DMZ3 can still be feasibly and cost-effectively eradicated. This includes deer populations on Bruny and King Island, the Tasman and Freycinet Peninsulas, around Hobart, and in the northwest. However, currently, the level of control actions in DMZ3 has been woefully inadequate to achieve the goal of eradication.

Previous work suggests that the most successful protocol for deer eradication is to front-load the program with effort and resources (Government of South Australia, 2023). For example, the South Australian government has calculated that a 60-65% reduction in the first 2 years, followed by 8 years of consistent removal of 38-55% will eradicate deer from South Australia in a 10-year timeframe (Figure 1). To achieve this requires high-intensity investment in those first 2 years (Figure 2).

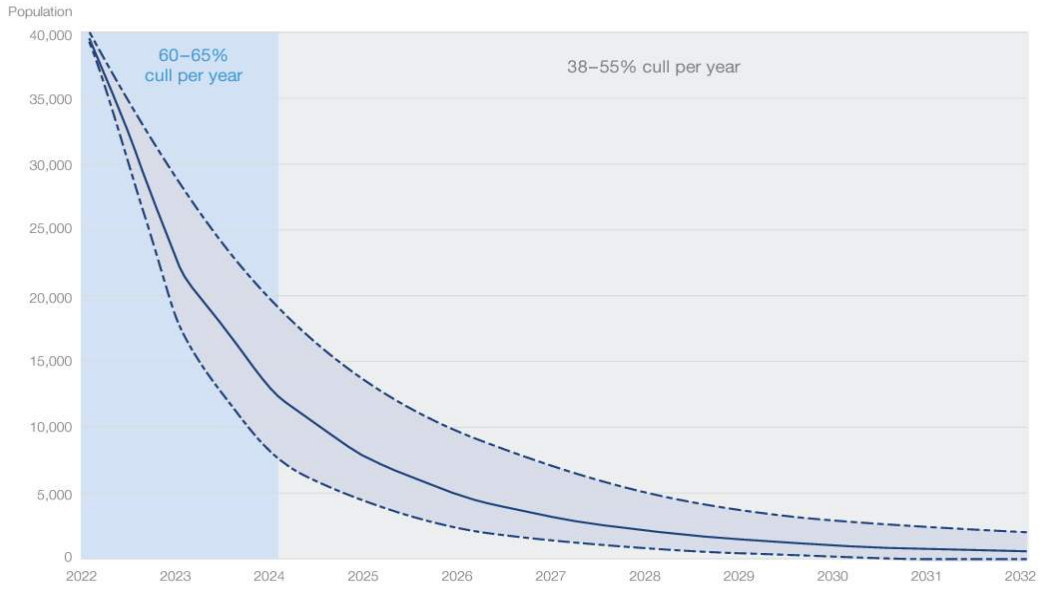

Figure 1. Population modelling of feral deer in South Australia under the fully funded eradication scenario, indicating the required 60-65% population cull required in the first two years of the program. Source: Feral Deer Control Economic Analysis, BDO EconSearch 2023.

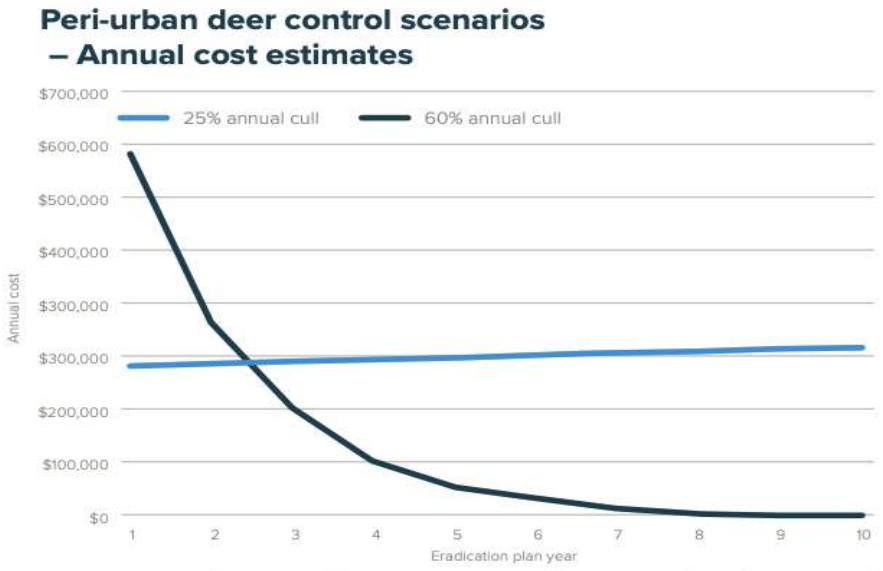

Figure 2. Annual estimated costs comparison of two periurban deer control scenarios (assuming 35% reproductive rate) and fixed control costs.

If the Tasmanian government is serious about deer eradication in Zone 3, it needs to fully commit the resources and funds to do so. Spreading small amounts of funding across several programs will not achieve eradication and is generally not an effective use of funds or resources. A better strategy would be to select two to three local control programs and fully commit the necessary funds and resources. Not only will this deliver wins for the government, but can also provide learnings for future control programs in other local areas.

Obvious choices for these easy wins are eradicating deer from Bruny Island, the Tasman Peninsula, and King Island. These populations are geographically isolated, which will make control efforts far

more impactful. There is a high level of community support for greater deer control in these regions, and importantly, the peri-urban deer program has built a strong foundation for the successful eradication of some of these populations, most notably on Bruny Island and the Tasman Peninsula.

It is important for the government to capitalise on the work that has been done to date. Importantly, the Walls of Jerusalem aerial shooting program was highly successful in removing deer from the Tasmanian World Wilderness Heritage Area (TWWHA). To ensure this effort is not wasted, work must now turn towards reducing the densities of deer in the surrounding areas, including the Central Plateau Conservation Area, to keep the TWWHA deer-free. Failure to continue deer control efforts now will result in deer reinvading and reestablishing, thereby wasting the efforts and successes of the aerial control program.

3. Response to 'Increased recreational access to public reserves'

This measure will fail to reduce deer numbers as it is based on the flawed assumption that increasing/expanding recreational hunting will result in meaningful declines in the population. As aforementioned, there is little evidence to support the expansion of recreational hunting as an effective means of reducing deer populations (see response to point 1). Recreational hunting has been the primary tool for management in Tasmania, and while it has slowed population growth, it has not resulted in population declines, even in areas where there are no restrictions (Lethbridge et al., 2025). Moreover, the success of this strategy that relies on recreational hunters depends on there being enough recreational hunters to take over 35% of the deer in these public reserves, plus the other areas that urgently need deer control. However, hunter numbers have stagnated over the last few years (NRET, 2023), suggesting there may not be more hunters to take up hunting in the new areas.

4. Response to 'No new deer farms approved in DMZ2 and DMZ3'

Given that escapes and releases from deer farms have been a major driver of the spread of deer into new areas of Tasmania (Cunningham et al., 2021), banning all new deer farms in DMZ2 and 3 is a practical, sensible, and effective measure to stop new deer populations from establishing. In addition to this, measures to manage and encourage the retirement of existing deer farms should be examined as these deer farms will continue to present a risk of reinvasion. As long as deer farms still exist in DMZ2 and 3, enforcement of regulations should be intensified to prevent these farms from leaking deer back into the environment.

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