Deer Management Policy Review 2026 Discussion Paper – Public Consultation

Invasive Species Council submission in response

October 2026

Document details

Deer Management Policy Review 2026 Discussion Paper – Public Consultation: Invasive Species Council submission in response. Invasive Species Council, October 2026.

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.

Intellectual property rights

© Invasive Species Council 2026

Unless otherwise noted, copyright and any other intellectual property rights in this publication are owned by the Invasive Species Council.



All material in this publication is licensed under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International License. Creative Commons Attribution 4.0 International Licence is a standard form licence agreement that allows you to copy, redistribute, remix, transmit and adapt this publication provided you attribute the work, you do not use it commercially and you distribute your contribution under this creative commons licence. The licence terms are available from https://creativecommons.org/licenses/by-nc-sa/4.0/.

Inquiries

Invasive Species Council

Address: PO Box 818, Katoomba NSW 2780, Australia

ABN: 27 101 522 829

Web: invasives.org.au

Email: contact@invasives.org.au

Overview

This submission responds to the Tasmanian government's invitation to comment on the *Discussion Paper: Review of the Tasmanian Wild Fallow Deer Management Plan*. The review will inform the *Tasmanian Wild Fallow Deer Management Plan 2027–2032*. The Invasive Species Council welcomes the opportunity to provide feedback. This submission builds on the feedback already provided as part of the 2025 consultation.

The Discussion Paper's candour is welcome. It acknowledges that there is no evidence of declines in the deer population and that continuing current management and policy settings are unlikely to result in changes to the deer population.

The government's own aerial surveys estimate the deer population in the surveyed area grew from 53,660 (±19%) in 2019 to 71,655 (±19%) in 2024, an annual increase of about 6%. Deer are now established beyond the traditional range, including in the Tasmanian Wilderness World Heritage Area (TWWHA), outer Hobart and Launceston, and as satellite populations on King Island, Bruny Island and the Tasman and Forestier Peninsulas. Frontier Economics estimates that deer already cost the Tasmanian economy more than $53 million a year in the Midlands and eastern regions alone.

This review is a critical opportunity to change course. The partly protected status of deer was designed to conserve them as a hunting resource. It has achieved that goal. It cannot also deliver the reduction in numbers, spread and impacts of deer that the Tasmanian community now needs.

The Tasmanian government should use this review to:

- declare feral deer a pest under the *Biosecurity Act 2019*, with an accompanying regulatory framework to enable control obligations in a deer eradication zone, as a first stage towards a statewide pest declaration
- replace the 3 management zones with a deer management zone and a deer eradication zone, with priority eradication areas that include King Island, Bruny Island and the Tasman Peninsula
- back regulatory reform with funding at the scale required for coordinated, professional control across land tenures
- set measurable, impact-based targets, with transparent monitoring and public reporting.

Recommendations

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

1. **Remove deer from the list of partly protected wildlife in the *Nature Conservation (Wildlife) Regulations 2021.***

   - Declare feral deer a pest under the *Biosecurity Act 2019*, with an accompanying regulatory framework to enable control obligations in a deer eradication zone, as a first stage towards a statewide pest declaration.
   - Outline the government's responsibility to plan, fund and lead coordinated deer control across land tenures.
     - In the deer eradication zone, require landholders not to maintain deer herds and to allow access for coordinated control work. Landholders would not be required to carry out control themselves.
     - Allow deer control in a deer containment zone to proceed without permits, seasons, bag limits or tagging.

2. **Reset the goals of the deer management plan.**

   - Make reducing deer numbers, geographic range and impacts the primary goals, with eradication wherever it is feasible. Maintaining deer as a hunting resource should not be a goal of the plan. Hunters will still have ample opportunities under stronger deer management, so restrictions to maintain a hunting resource are not needed.

3. **Replace the 3 deer management zones with 2 clear zones.**

   - A deer eradication zone, covering all areas outside the core range, where the objective is to remove all deer populations.
     - Within the eradication zone, lead priority control programs across land tenures using all effective tools, including thermal-assisted aerial culling, professional ground shooting, trapping and accredited volunteer shooters.
     - Prioritise eradication programs on King Island, Bruny Island and the Tasman Peninsula, and keep the TWWHA deer-free by continuing aerial control on the Central Plateau and adjacent conservation areas.
   - A deer management zone, covering the core range, where the objective is to reduce deer impacts and prevent further spread.
     - Support deer control using all effective tools, including thermal-assisted aerial culling, professional ground shooting, trapping, accredited volunteer shooters and exclusion fencing where appropriate.

4. **Set impact-based targets for the deer management zone.**

   - Define thresholds for agricultural, forestry, environmental and road-safety impacts, informed by independent science.
   - Set annual removal targets to meet them.
   - Track removal rates and impacts against targets, extend surveys beyond the current survey area, and report results publicly each year.

5. **Scale up funding for deer management under the next deer plan.**

This should include at least:

- $15 million over 5 years for targeted, coordinated professional control in the Midlands
- $14 million over 10 years for priority eradications, starting with King Island, Bruny Island and the Tasman Peninsula, with funding and effort front-loaded
- $150,000 per year to continue aerial control protecting the TWWHA
- matching federal funding for programs of national significance (e.g. the TWWHA and Bruny Island).

6. **Strengthen governance and delivery capacity.**

- Appoint at least 6 regional deer coordinators to work with landholders and the community.
    - Ensure there is a deer coordinator for the TWWHA deer control program and all priority eradication programs.
- Broaden advisory arrangements to include representatives from farming, forestry, Landcare, natural resource management (NRM) groups, private land conservancies, environment groups, national parks, local councils, road safety, scientists, tourism operators and the Tasmanian Aboriginal community.

7. **Prevent deer farms from seeding new populations.**

- Maintain commitment to no new deer farms in the deer eradication zone and urgently scale up enforcement of deer farm regulations on existing farms.
- Consider introducing retirement incentives for existing deer farms in the deer eradication zone.

Key funding recommendations

Proposal section	Investment item	Term (years)	Total cost ($m)
Midlands (section 6)	Targeted, coordinated professional control in the Midlands	5	15.0
Eradications (sections 3, 6)	Priority eradications on King Island, Bruny Island and the Tasman Peninsula, front-loaded	10	14.0
TWWHA (sections 3, 6)	Continued aerial control protecting the TWWHA	Ongoing	0.15 a year
Federal co-investment (section 6)	Matching federal funding for programs of national significance (TWWHA, Bruny Island)	–	Matched
TOTAL STATE INVESTMENT		**–**	**29.0 + 0.15 a year**

Responses to the Discussion Paper

1. The extent to which the objectives of the Deer Plan 2022–2027 have been met

The Tasmanian Wild Fallow Deer Management Plan 2022–27 (the deer plan) has not reduced the abundance or geographic range of deer, which were among the goals of the plan. The government's own assessment confirms this.

- The 2024 aerial survey estimated 71,655 deer (±19%) in the surveyed area, up from 53,660 (±19%) in 2019. This is a compound annual increase of about 6%. No estimate was made for deer outside the surveyed area, so the statewide total is higher.
- High-density areas have expanded. The population was centred on the Northern Midlands in 2019. By 2024, a second high-density centre had formed in the Central Highlands, which borders the TWWHA. Density is increasing towards the south-east.
- The Discussion Paper rates the effectiveness of Tasmania's approach as 'Low', the lowest of any jurisdiction it compares.

The Implementation Strategy Progress Report lists most actions as complete. But completing actions is not the same as achieving outcomes. For example, the October 2026 Progress Report records that the Peri-urban Deer Control Project removed 20 deer in the Launceston area and 41 elsewhere. The Deer Farm Compliance Officer has visited 34 of the 114 known deer farms. These efforts are valuable, but they are not at the scale needed to reduce deer numbers or stop new populations from establishing.

Among the reasons the plan has not met its population goals are systemic issues with how deer have been managed in Tasmania, including:

- **The plan's purpose is in tension with its population goals.** The plan seeks to balance deer impacts against 'maintaining a traditional and sustainable hunting resource'. Partly protected status, seasons, bag limits and tagging were designed to conserve deer, not to reduce them.
- **Control has been largely left to individual landholders' discretion and capacity.** As the Discussion Paper notes, deer control is implemented by landholders based on their own priorities. There is no obligation to participate in deer management. No one is responsible for coordinating control across properties, so neighbours who do not control deer undermine the efforts of those who do. Landholders also receive little support for deer control, so many rely on volunteer shooters of varying skill and motivation.
- **Coordinated professional control has been limited and under-resourced.** The majority of deer control within the core range of deer has been left to landholders and recreational hunting. Annual removal rates above 35% are needed to reduce fallow deer populations (Botterill-James et al. 2024). Recreational hunting does not achieve these rates (Comte et al., 2025).

Where coordinated, professional control has been resourced, it has worked. Thermal-assisted aerial culling has functionally eradicated deer from the Walls of Jerusalem National Park, in the TWWHA, in 54 operational days between 2023 and 2025 (Tasmania Parks and Wildlife Service 2025). This program shows what the next plan can achieve if it prioritises coordinated control with the right tools.

2. The goals of future deer management in Tasmania

The primary goals of the next deer plan should be to:

- reduce deer numbers and their geographic range,
- reduce the impacts of deer on Tasmanian primary industries, natural and cultural values and public safety,
- eradicate deer where eradication remains feasible, starting with isolated and satellite populations,
- set clearly defined objectives for different areas of Tasmania.

Maintaining deer as a resource for recreational hunting should not be a goal of the plan. This is consistent with the National Feral Deer Action Plan 2023–2028, which, as the Discussion Paper notes, regards sustaining a hunting resource as different from best practice in reducing deer impacts.

This does not mean the end of deer hunting. Deer will remain in the deer management zone for the foreseeable future, and hunters will continue to have ample opportunities there. In fact, with reduced restrictions, there would arguably be more hunting opportunities. In NSW, game protections on private land were removed in 2019 (*Game and Feral Animal Control Amendment (Deer) Order 2019* (NSW)), and deer are listed as a priority pest under regional pest animal management plans. In Queensland, feral deer are a restricted invasive animal, with a general biosecurity obligation on landholders to manage them (Department of Agriculture and Fisheries n.d.). Recreational hunting continues in both states. The difference is that hunting would contribute to the plan's goals rather than define them.

The current plan's attempt to balance impact reduction against maintaining a hunting resource has not reduced deer numbers. Clear goals would give landholders, land managers, hunters and the wider community certainty about what the plan is trying to achieve and allow progress to be measured.

Defining a sustainable level of deer in the management zone

The Discussion Paper asks how a sustainable population could be defined and by whom. Best practice in invasive species management is to base targets on impact thresholds rather than population estimates, which carry wide margins of error.

Impacts, not deer numbers as such, are what matter to farmers, foresters, land managers and road users. Impact thresholds would:

- be set using independent scientific advice, with input from stakeholders,
- cover agricultural production, forestry regeneration, native vegetation condition (including threatened communities) and deer–vehicle collisions,
- be linked to annual removal targets, adjusted as monitoring improves,
- be reviewed through the plan's public reporting.

Population estimates remain useful as a guide. The Invasive Species Council's 2021 strategy, *Feral Deer Control: A Strategy for Tasmania*, proposed reducing the Midlands population to fewer than 10,000 deer. This would return it to levels last seen in the late 1970s and early 1980s, when deer occupied a much smaller area. But any population figure should be a guide only. Success in the deer management zone should be judged by whether impacts fall to an acceptable level, not by whether a particular number of deer is reached.

Recommendation 2: Reset the goals in the next deer plan so that reducing deer numbers, range and impacts are the primary goals, with eradication wherever it is feasible.

3. Deer management zones

Replacing the 3 deer management zones with 2 zones, a deer management zone and a deer eradication zone, would give regulatory clarity. Defining priority eradication areas within the eradication zone will clearly signal regulatory intent. This recommendation corresponds most closely to the Discussion Paper's option to 'clearly define priority eradication zones, where eradication is feasible (including island and peninsula eradication)'.

Why the current zones are not working

- Zone 2 has no clear objective. It allows landholders to manage deer either in line with Zone 1 (sustainable hunting) or Zone 3 (no deer). The Discussion Paper shows widespread population growth in Zone 2, which now functions as an extension of the core range rather than a buffer.
- Zone 3 has an objective but no means to achieve it. 'No deer' is the stated objective, but deer are now established in many parts of Zone 3, and landholders can still choose to keep deer on their properties. Stating an eradication goal is not the same as funding or implementing one.
- Since September 2026, the rules for Zones 2 and 3 have been the same. Recreational hunters and permit holders can take all classes of deer year-round without bag limits or tagging in both zones. The distinction between them no longer has a practical purpose.

A simpler model: 2 zones

Zone	Area	Objective	Key settings
Deer eradication zone	All of Tasmania outside the core range, including the TWWHA, national parks, islands, peninsulas and peri-urban areas	Eradicate existing deer populations in priority order and remove new incursions quickly	Pest declaration; government-led programs across all tenures; landholders to allow access for control; no new deer farms
Deer management zone	The core range in the Midlands and Central Highlands	Reduce impacts below defined thresholds and prevent further spread	No protection; landholders free to control deer; coordinated landscape programs; recreational hunting continues

The boundary of the management zone should be drawn tightly around the core range, using the 2024 survey and current distribution data. It should not expand to follow deer as they spread.

It is important to note that the core range of deer aligns with Tasmania's midlands, which are a national biodiversity hotspot, containing critically endangered native grasslands and other threatened flora and fauna. The presence of deer in the midlands at any level will have a negative impact on these values. As such, it is vital that the deer management zone is not neglected and priority conservation areas within the management zone should be targeted for asset protection management and localised eradications.

Priority eradication areas

Within the eradication zone, King Island, Bruny Island and the Tasman Peninsula should be the initial priority areas for eradication.

- They are geographically isolated. Water or narrow necks of land limit reinvasion, so the gains from control are lasting. The Discussion Paper itself notes that eradication 'seems most successful where populations are small and isolated'.
- Groundwork is already in place. The Peri-urban Deer Control Project has worked on Bruny and the Tasman, and the King Island deer management project was part of the Implementation Strategy.
- They are nationally significant. Bruny Island is a priority place under the Commonwealth's Threatened Species Action Plan, which creates a pathway for matched federal funding.
- Communities support action. There are relatively high levels of community support for deer control in these areas.

Further priority areas should be included as resources allow, guided by feasibility and risk. Candidates include the area between Bicheno and Freycinet Peninsula, the population in the northwest and the northeast, and peri-urban areas around Hobart and Launceston.

The TWWHA should remain within the eradication zone. The progress report confirms deer are still present in the Central Plateau Conservation Area, the Great Western Tiers Conservation Area and the Mole Creek Karst National Park, with occasional reports in Mount Field National Park and west of Lake St Clair. Continued aerial control around the Walls of Jerusalem is needed to stop reinvasion and protect the investment already made.

Recent modelling of the Walls of Jerusalem program (Botterill-James et al. 2026) found that culling across a broad area was consistently more effective than targeting only high-density source areas. Complete exclusion of deer from the national park was achievable only with annual culling across a substantially expanded area. Ongoing funding should be planned on this basis.

Learning from front-loaded eradication programs

Previous work suggests the most successful approach to deer eradication is to front-load programs with effort and resources (Government of South Australia 2023). South Australia calculated that a 60–65% reduction in the first 2 years, followed by 8 years of consistent removal of 38–55%, would eradicate deer from the state within 10 years.

South Australia's experience is relevant to Tasmania because it targets the same species and includes island and peri-urban eradications. Tasmania's core population is larger and denser, so this model applies most directly to Tasmania's isolated populations.

Spreading small amounts of funding across many programs will not achieve eradication. A better strategy is to fully fund 2 or 3 programs. This will deliver early wins and lessons for later programs.

Recommendation 3: Replace the 3 deer management zones with a deer eradication zone and a deer management zone, starting with eradications on King Island, Bruny Island and the Tasman Peninsula.

4. Regulatory approaches

Declaring deer a pest species is a necessary regulatory reform to finally reduce deer numbers in Tasmania. It is the only option in the Discussion Paper that combines the removal of regulatory barriers with the means to coordinate control across property boundaries.

The drawbacks of partly protected status

The Discussion Paper asks about the benefits and drawbacks of partly protected status. Its main benefit is to conserve deer as a hunting resource, which it was designed to do. Its drawbacks are that:

- it signals that deer are valued wildlife, when they are an invasive species causing tens of millions of dollars in damage each year,
- it has required a complex system of permits, seasons and tags, which nearly all stakeholders agree is 'complicated, confusing' and administratively burdensome,
- it gives no basis for requiring landholders to manage deer, so coordinated control depends on voluntary participation,
- it leaves Tasmania out of step with most other Australian jurisdictions. According to the Discussion Paper's own comparison, Tasmania is among the last jurisdictions where deer remain protected.

Why removing protection alone is not enough

The options to remove protected status on private land, or to remove it entirely, are steps in the right direction. For the clearest regulatory intent, all restrictions on taking deer should be removed. Removing regulatory restrictions alone will not reduce deer numbers, as the Discussion Paper's own analysis of these options acknowledges. It notes that control efforts 'may remain fragmented' and that populations 'can quickly recover if neighbouring properties do not participate'.

Evidence from Tasmania and elsewhere supports this:

- 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 every year (Botterill-James et al. 2024).
- Research in Tasmania found that recreational hunters typically did not exceed these removal rates, even where there were no restrictions on the number of female deer that could be taken (Comte et al. 2025).
- In NSW, removing seasonal restrictions on taking female deer was associated with a 2-fold increase in the number of deer shot by hunters. But this only slowed population growth; it did not reduce numbers (Bengsen and Forsyth 2019).
- In New Zealand, 6 decades of unrestricted hunting of sika deer have not restored forest regeneration (Husheer and Tanentzap 2024).

The September 2026 changes to the deer permitting system have already removed most restrictions in Zones 2 and 3. The Discussion Paper expects these to have only an incremental impact. Simply extending the same approach statewide is unlikely to change the outcome.

What a pest declaration would add

A declaration under the *Biosecurity Act 2019* would:

- establish clear, consistent management objectives, aligned with the National Feral Deer Action Plan and most other Australian jurisdictions,

- make deer control a public responsibility, with government planning, funding and leading programs rather than leaving the problem to individual landholders, and, in the eradication zone, ensure no landholder can maintain a deer refuge in an area targeted for eradication,
- give government the statutory basis to plan and deliver coordinated programs across tenures,
- remove the remaining permits, seasons, bag limits and tagging requirements for landholders.

The Discussion Paper raises a fair question: how dependent would this option be on sustained control on the ground? The answer is, entirely. A pest declaration is necessary but not sufficient. It must be paired with funded, coordinated control programs (see sections 5 and 6). Equally, funded programs will be undermined if landholders in eradication areas can choose to keep deer.

The next plan should establish a clear pathway towards the long-term objective of statewide declaration across Tasmania. As a pragmatic first step, the regulatory framework should declare deer as a pest species within the eradication zone, where eradication is already the stated management objective, while creating the legislative foundations for broader application in the future.

- **In the deer eradication zone:** government-led eradication programs across all tenures. Landholders would be required not to maintain deer herds and to allow access for coordinated programs. They would not be required to carry out control themselves.
- **In the deer management zone:** no protection and no permits, with landholders free to control deer. There would be no regulatory obligations on landholders but landholders would be supported to join coordinated landscape programs.

Balancing different interests

The Discussion Paper asks how different views should be balanced. A pest declaration in the deer eradication zone offers a better balance than the status quo. Hunters would retain ample opportunities in the deer management zone and on designated public land, as in NSW. Farmers, foresters, conservation land managers and peri-urban communities would gain the tools and coordination to reduce impacts. As the Discussion Paper notes, community support for maintaining a hunting resource may increase if the negative impacts of deer are managed more effectively elsewhere.

A pest declaration is not about penalising landholders. Most of Tasmania's deer occur on private rural land, and farmers already bear much of the cost of deer. The declaration should make deer control a public responsibility led by the government, while freeing landholders from regulatory barriers rather than adding new duties. It would also not remove recreational hunting access to designated public land. In NSW, game protections on private land were removed in 2019 and hunting on public land continues.

Recommendation 1: Remove deer from partly protected wildlife and declare them a pest under the *Biosecurity Act 2019*, with the government leading coordinated control.

5. Practical management of deer populations

The Discussion Paper correctly points out that outcomes are 'wholly determined by the implementation of deer control measures on the ground', and that reducing deer at a landscape scale requires coordination across property boundaries and tenures.

Coordinated, government-led control

Coordinated deer control across property boundaries, with state-implemented and mandated culling in the deer eradication zone, is essential to reduce deer numbers at scale. Greater leeway for landholders is important and welcome, but it will not on its own reduce deer numbers.

Successful invasive species control programs have clear goals, measurable objectives, target removal rates and monitoring against those objectives (Bengsen et al. 2020). The Tasmanian government is best placed to plan and coordinate these programs across tenures, particularly for eradication and containment, as the Discussion Paper recognises.

The role of each control method

The Discussion Paper asks what role each control method should play. Each method suits different objectives and settings.

Method	Role in the next plan	Evidence and considerations
Thermal-assisted aerial culling	Primary tool for rapid reduction in remote, rugged or extensive terrain, and for eradication and protection of the TWWHA	Removed 1,346 deer in 54 days in and around the Walls of Jerusalem National Park Department of Natural Resources and Environment Tasmania (2026b). One professional shooter in a helicopter killed 182 deer in 4 hours at Gum Lagoon Conservation Park, SA (RSPCA 2018)
Professional ground shooting	Primary tool for coordinated programs in accessible and peri-urban areas, and for follow-up in eradication areas	Contract shooters killed 4 times more sambar deer per unit effort than volunteers (Comte et al. 2022)
Trapping and aggregators	Targeted use where shooting is unsafe, especially in peri-urban areas	Being trialled by the Peri-urban Deer Control Project
Accredited volunteer shooters	Support professional programs under direction, with clear objectives	Seventeen volunteers removed 26 deer to support the Walls of Jerusalem aerial program Department of Natural Resources and Environment Tasmania (2026b)
Landholder control	Ongoing impact reduction on private land, especially in the deer management zone	Effective at property scale; populations recover if neighbours do not participate
Recreational hunting	Supporting role in the deer management zone and on designated public land	Of ground-shooting programs relying on recreational or volunteer shooters, 70% fail to meet reduction targets (Bengsen et al. 2020)
Commercial harvest	Supporting role in the deer management zone	Not suited to remote culling operations, where carcass recovery is impractical

Why recreational hunting alone cannot reduce deer numbers

The Discussion Paper acknowledges that large-scale population suppression has not been achieved by recreational hunting alone, in Tasmania or elsewhere in Australia. The reasons for this are well documented:

- Hunters have limited reach, as they are on foot and tend to focus on accessible areas.
- Hunter motivations vary and do not always align with population reduction. Some hunters prioritise taking stags over does or lose interest as deer become harder to find (Bengsen et al. 2020; Comte et al. 2025; Finch et al. 2014).
- In NSW, licensed hunters take on average about 3 days for each deer they kill, and each hunter kills on average less than one deer a year (Department of Primary Industries NSW 2024).

Skilled recreational hunters can make a valuable contribution, particularly through accredited volunteer programs that are coordinated with professional control. However, recreational hunting cannot be the primary control tool if the plan is to reduce deer numbers.

Priorities for government-led control

The Discussion Paper asks what the priorities for government-led control should be. They should be:

1. implementing island and peninsula eradications, starting with King Island, Bruny Island and the Tasman Peninsula,
2. detecting and eradicating deer that threaten natural and cultural values, especially in the TWWHA and national parks,
3. preventing deer from spreading into new areas, including rapid response to new incursions,
4. controlling deer in peri-urban areas, where public safety risks are highest,
5. supporting regional landscape programs in the deer management zone.

6. Funding deer control and sharing the costs

The next plan will only succeed if it is funded at the scale required. Current funding has been and continues to be well below that scale, particularly given the estimated costs of deer to the Tasmanian economy.

The cost of inaction is far greater

Frontier Economics estimated that deer cost the Midlands and eastern regions more than $53 million in 2025. This is a conservative estimate, and actual costs are likely to be much higher. These costs could accumulate over the next 30 years to between about $754 million and $1.4 billion, depending on how quickly costs grow with deer numbers (Frontier Economics 2026). Both figures are likely underestimated. They cover only part of Tasmania and exclude many environmental, cultural and biosecurity impacts.

The costs of control also rise the longer action is delayed, since deer numbers will grow and spread. South Australia calculated that its $14 million feral deer eradication program will deliver a net benefit of $517.8 million over 10 years, a return of $2.70 for every dollar invested (Government of South Australia 2023). Tasmania's circumstances differ, but the principle holds: early, well-funded action costs far less than ongoing damage.

What should be funded

The next plan needs at least:

- **$15 million over 5 years** for targeted, coordinated professional control in the Midlands

- **$14 million over 10 years** for priority eradications, starting with King Island, Bruny Island and the Tasman Peninsula, with funding and effort front-loaded into the first 2 years of each program
- **$150,000 per year** to continue aerial control protecting the TWWHA
- matching federal funding for programs of national significance, such as the TWWHA and Bruny Island.

Sharing the costs

The Discussion Paper asks how the ongoing costs of control should be met. One option is to share costs according to who benefits and who is best placed to act.

The government should also consider directing revenue from deer hunting licences to deer control. Removing the remaining permit and tagging system would reduce administrative costs, freeing resources for control on the ground.

Government-facilitated, cross-tenure control would also allow landholders, local government and businesses to pool resources and work at a landscape scale. This would need a long-term change to how vertebrate pest control is organised in Tasmania. Other states offer tested models:

- In Western Australia, Recognised Biosecurity Groups are funded by a Declared Pest Rate paid by landholders, which the state government matches dollar for dollar (Department of Primary Industries and Regional Development n.d.).
- In Queensland, Whitsunday Regional Council has run a coordinated aerial control program for multiple vertebrate species including deer since 2012. It is funded by council and landholder contributions and now covers 5 council areas (Whitsunday Regional Council n.d.).

Both models rely on community trust built through consistent delivery over many years.

Recommendation 5: Fund the next deer plan at the scale required – at least $29 million for Midlands control and priority eradications, plus $150,000 a year for TWWHA aerial control.

7. Governance, roles and stakeholder engagement

Governance arrangements should include the following to support deer control:

1. **Regional coordination**
    - The next plan should appoint at least 6 regional deer coordinators to work with landholders, councils and community groups. Local coordination is critical to the success of landscape-scale programs, which depend on high participation across neighbouring properties.
    - Regional plans should be developed for each region, building on the South-eastern Tasmania Regional Deer Management Plan prepared by NRM South with the support of several local councils and Parks and Wildlife.
2. **Broader stakeholder involvement**
    - The Discussion Paper recognises that effective management may require the closer involvement of all landholders, including forestry, and all levels of government.

- Advisory arrangements for the plan should include representatives from road safety, farming, forestry, Landcare, NRM groups, private land conservancies, other environment groups, National Parks, local councils, scientists, tourism operators and the Tasmanian Aboriginal community, alongside hunting organisations.
- As a first step, the government should convene an impacted-stakeholder roundtable to inform the development of the new plan.

Roles of different parties

Party	Role in the next plan
Tasmanian government	Lead planning, coordination and delivery of eradication and landscape programs; regulation; monitoring and reporting
Australian Government	Co-invest in nationally significant areas (TWWHA, Bruny Island); national coordination through the National Feral Deer Action Plan
Local government	Partner in peri-urban programs; record deer–vehicle collisions and hotspots; co-fund local programs; community engagement
Regional NRM bodies	Develop and support regional plans; engage landholders; coordinate community action
Landholders	Control deer on their land free of red tape; participate in coordinated programs; in the eradication zone, allow access for control
Tasmanian Aboriginal community	Shape priorities and delivery, including on the protection of cultural landscapes; employment in control programs
Hunters	Contribute through accredited volunteer programs and hunting in the deer management zone

Community awareness

The Discussion Paper asks how community awareness could be improved. Government deer communications should:

- explicitly state that deer are an invasive species and why control is needed
- report progress publicly against the plan's targets each year
- continue to promote reporting of deer sightings through DeerScan
- publish information on deer–vehicle collisions, impacts on farms and the environment, and the results of control programs.

Recommendation 6: Strengthen governance with at least 6 regional deer coordinators and broader stakeholder advisory arrangements.

8. Population monitoring and evidence

The 2019 and 2024 aerial surveys provide a strong baseline, and the planned 2027 survey is crucial to provide an evidence base for public discussion of policy. Monitoring under the plan should measure whether control is working, particularly at a regional scale.

Monitoring should:

- **Track removal rates against targets.** Programs should estimate the proportion of the population removed each year, to show whether removals exceed the rate of population growth.

- **Measure impacts directly.** Monitoring should cover the impacts used to set thresholds in the deer management zone (see section 2): agricultural losses, forestry regeneration, native vegetation condition and deer–vehicle collisions.
- **Cover the whole state.** The 2024 estimate applies only to the defined survey area. Future surveys should detect and track populations outside it, especially in the deer eradication zone.
- **Verify eradication.** Priority eradication areas need surveillance before, during and after control, with agreed criteria for declaring an area deer-free.
- **Improve take data.** The new take return app is welcome. Take returns are only useful if they are accurate; there have been anecdotal reports of landholders culling deer without permits because of administrative burdens.

Another way to track progress is catch per unit effort (CPUE): the number of deer removed per hour of shooting, per flight hour, or per dollar spent. Population surveys are expensive and are often imprecise. CPUE uses data that control programs already collect. As deer become scarcer, they take longer to find, so a falling CPUE over time shows control is working, while a steady or rising CPUE shows removals are not keeping pace with breeding. In Western Australia, 7 years of CPUE data from aerial shooting of feral pigs showed that catch rates increased despite more than 13,500 pigs being removed. This gave managers a clear signal that the program needed to change (Dawson et al. 2026). This approach has already been applied in Tasmania: modelling of the Walls of Jerusalem program used CPUE data from aerial culling to estimate the effort needed to keep the area deer-free (Botterill-James et al. 2026).

The Discussion Paper asks about the relative importance of monitoring compared with control. Monitoring should not come at the expense of control and vice versa. Targeted monitoring and evaluation is what determines whether a program is successful and effective. A fixed share of each program's budget should be allocated to monitoring and evaluation. Results should be reported publicly each year against the plan's targets.

Recommendation 4: Set impact-based targets for the deer management zone, track removal rates against them and report results publicly each year.

9. Regulation of deer farming and controls to minimise escapes

Escapes and releases from deer farms have been a major driver of the spread of deer into new areas of Tasmania (Cunningham et al. 2022), as the Discussion Paper acknowledges. Deer farms in the eradication zone will remain a source of reinvasion for as long as they operate.

The *Nature Conservation (Deer Farming) Regulations 2022* and the creation of a Deer Farm Compliance Officer position are positive steps. But a single compliance position is unlikely to be sufficient for 114 known deer farms, of which only 34 have been visited to date.

The next plan should:

- maintain a ban on new deer farms in the deer eradication zone,
- urgently scale up enforcement of the Regulations, including regular inspection of all deer farms in the eradication zone, fencing standards, traceability of farmed deer, and enforceable penalties for escapes,
- introduce retirement incentives for existing deer farms in the deer eradication zone, with a managed process for removing remaining animals when farms close,
- prioritise compliance in and near priority eradication areas. Bruny Island and the Tasman Peninsula have both had deer farms or hobby farms with deer.

Recommendation 7: Keep the ban on new deer farms in the eradication zone, scale up enforcement and offer retirement incentives to existing farms.

10. Interaction with the June 2026 changes

The June 2026 changes are not the subject of this consultation. However, the next plan will need to set out how recreational hunting on public land and commercial harvest of wild-shot deer fit with its objectives.

The commercial harvest of wild-shot deer can make use of deer removed in accessible areas and respond to community concern about waste. To ensure it supports the next deer plan's objectives, it is important that:

- commercial harvest is treated as one part of the solution, supporting coordinated control programs rather than substituting for them,
- the plan does not rely on commercial harvest to reduce deer numbers, and in priority eradication areas carcass recovery never limits control effort,
- commercial arrangements do not create incentives to maintain deer populations or to translocate deer,
- the effect of commercial harvest on removal rates is monitored and reported.

As the Discussion Paper notes, it is often impractical to recover carcasses during professional culling operations, particularly aerial culling in remote areas. The next plan should make clear that carcass use will not be allowed to constrain the most effective control methods.

Similarly, the next plan should ensure that public land in the deer eradication zone is managed for eradication, with recreational hunting there coordinated with, and supporting, professional control programs.

Conclusion

The Invasive Species Council commends the Tasmanian government for bringing this review forward, for its candid assessment of the current plan and for putting the status of deer forward for discussion. This review is a genuine opportunity, and the decisions made now will shape deer management in Tasmania for decades.

The opportunity is real because Tasmania still has options that other states have lost. Satellite populations around the state can still be eradicated; the TWWHA can be kept deer-free; the Midlands population can be contained and its impacts reduced. Acting now would protect farm and forestry production, reduce the risk to road users, safeguard Tasmania's World Heritage and other natural areas, and avoid costs that could otherwise reach between $754 million and $1.4 billion over the next 30 years.

The alternative is to continue on the current path. Mainland experience shows where that leads. In Victoria and NSW, deer are now entrenched across national parks, farmland and even in city suburbs, where control is far more costly; eradication is no longer possible.

Tasmania does not have to follow that path. With a pest declaration, clear eradication and management zones, and funding at the scale required, this plan can be the turning point. We

look forward to working with the government, other stakeholders, and the wider community to make that happen.

References

Bengsen, A. J., & Forsyth, D. M. (2019). *Estimates of the licensed deer hunter harvest in New South Wales in 2018*. NSW Department of Primary Industries, Vertebrate Pest Research Unit.

Bengsen, A. J., Forsyth, D. M., Harris, S., Latham, A. D. M., McLeod, S. R., & Pople, A. (2020). A systematic review of ground-based shooting to control overabundant mammal populations. *Wildlife Research*, 47(3), 197–207.

Botterill-James, T., Buck, R., Cunningham, C. X., Driessen, M. M., Johnson, C. N., Pople, A., & Forsyth, D. M. (2026). Using a spatially explicit population model to evaluate management scenarios for an invasive deer population. *NeoBiota*, 106, 191–213. https://doi.org/10.3897/neobiota.106.173542

Botterill-James, T., Cunningham, C. X., Johnson, C. N., et al. (2024). Projecting the dynamics of invading deer with pattern-oriented modelling to support management decision-making. *Journal of Applied Ecology*, 61, 173–185.

Comte, S., Bengsen, A. J., Botterill-James, T., Brausch, C., Bryant, S. L., Dickson, C. R., et al. (2025). Impacts of recreational hunting on an introduced population of fallow deer (*Dama dama*) in Tasmania, Australia. *Ecological Management & Restoration*, 26(1), e70001.

Comte, S., Thomas, E., Bengsen, A. J., Bennett, A., Davis, N. E., Brown, D., & Forsyth, D. M. (2022). Cost-effectiveness of volunteer and contract ground-based shooting of sambar deer in Australia. *Wildlife Research*, 50(9), 642–656. https://doi.org/10.1071/WR22030

Cunningham, C. X., Perry, G. L. W., Bowman, D. M. J. S., et al. (2022). Dynamics and predicted distribution of an irrupting ‘sleeper’ population: fallow deer in Tasmania. *Biological Invasions*, 24, 1131–1147.

Dawson, S. J., Kreplins, T. L., Zabek, M. A., Hone, J., & Adams, P. J. (2026). Management, demographic and dietary insights from 7 years of aerial shooting of feral pigs in an agricultural landscape. *Wildlife Research*, 53, WR26049. https://doi.org/10.1071/WR26049

Department of Agriculture and Fisheries (n.d.). *Feral fallow deer* [Invasive animal fact sheet]. State of Queensland. https://www.publications.qld.gov.au/dataset/e1aa5912-b5c2-4faa-a583-3c04cdba950d/resource/eac66365-7c63-4f39-8960-7392eddf1915/download/feral-fallow-deer.pdf

Department of Climate Change, Energy, the Environment and Water (2022). *Threatened Species Action Plan 2022–2032: Towards Zero Extinctions*. Australian Government.

Department of Natural Resources and Environment Tasmania (2022). *Tasmanian Wild Fallow Deer Management Plan 2022–27*.

Department of Natural Resources and Environment Tasmania (2026a). *Discussion Paper: Review of the Tasmanian Wild Fallow Deer Management Plan*. Public Consultation, October 2026.

Department of Natural Resources and Environment Tasmania (2026b). *Tasmanian Wild Fallow Deer Implementation Strategy Progress Report*. October 2026.

Department of Primary Industries and Regional Development (n.d.). *Recognised Biosecurity Groups*. Government of Western Australia. https://www.dpird.wa.gov.au/businesses/biosecurity/biosecurity-legislation-and-governance/bam-act/recognised-biosecurity-groups

Department of Primary Industries NSW (2024). Hunting. https://www.dpi.nsw.gov.au/about-us/publications/pdi/2024/hunting

Ecoknowledge (2025). *The 2024 aerial survey of fallow deer in Tasmania: summary report*. Report to the Department of Natural Resources and Environment Tasmania. https://nre.tas.gov.au/Documents/The%202024%20aerial%20survey%20of%20fallow%20deer%20in%20Tasmania%20-%20summary%20report.pdf

Finch, N., Murray, P., Hoy, J., & Baxter, G. (2014). Expenditure and motivation of Australian recreational hunters. *Wildlife Research*, 41, 76–83.

Frontier Economics (2026). *A buck too far: an analysis of the economic, social & environmental cost of deer in Tasmania*. A report for the Invasive Species Council.

Game and Feral Animal Control Amendment (Deer) Order 2019 (NSW). https://legislation.nsw.gov.au/view/pdf/asmade/sl-2019-444

Government of South Australia (2023). *Feral Deer Control Economic Analysis*. Prepared by BDO EconSearch.

Husheer, S. W., & Tanentzap, A. J. (2024). Hunting of sika deer over six decades does not restore forest regeneration. *Journal of Applied Ecology*, 61(1), 134–144.

Invasive Species Council (2021). *Feral Deer Control: A Strategy for Tasmania*. Prepared for the Bob Brown Foundation.

National Feral Deer Action Plan Working Group & National Deer Management Coordinator (2023). *National Feral Deer Action Plan 2023–28*. Centre for Invasive Species Solutions. https://feraldeerplan.org.au/

NRM South (2026). *South-eastern Tasmania Regional Deer Management Plan*.

RSPCA (2018). RSPCA Australia submission to the Senate inquiry into the impact of feral deer, pigs and goats in Australia.

Tasmania Parks and Wildlife Service (2025). *TWWHA Deer Control Project: summary, November 2025*. https://parks.tas.gov.au/Documents/TWWHA%20Deer%20Control%20Summary%20-%20November%202025.pdf

Whitsunday Regional Council (n.d.). *Feral Animal Control Program 2017–2020*. https://whitsundayrc.qld.gov.au/downloads/file/795/feral-animal-control-program