

1 December 2021

Game Services Tasmania
DeerManagementPlan@dpiwve.tas.gov.au

RE: DRAFT TASMANIAN WILD FALLOW DEER MANAGEMENT PLAN 2021

Thank you for the opportunity to provide feedback on the *Draft Tasmanian Wild Fallow Deer Management Plan*.

The Tasmanian National Parks Association (TNPA), as an advocate for the long-term conservation of Tasmania's national parks and reserves, regards wild feral deer (*Dama dama*) as a significant threat to the natural values of Tasmania's unique and valuable national parks and protected areas.

The TNPA's most immediate concern is the encroachment of wild feral deer into the eastern Central Plateau where wet ecological communities are at particular risk of trampling damage similar to that inflicted by wild horses on Kosciuszko National Park's fragile alpine and sub-alpine environment (NSWDPIE, 2021). The draft plan does not put sufficient emphasis on the exclusion of wild feral deer from this area. A related concern is that feral deer control on reserved land must be undertaken by the managing authority in the most efficient manner possible (i.e. feral deer control is not delegated to unsupervised recreational shooters).

The TNPA recently provided input to the *draft Nature Conservation (Wildlife) Regulations 2021* and *Nature Conservation (Deer Farming) Regulations 2021* and lodged a submission relating to Fallow Deer management in 2020 (TNPA 2020).

While there are some positive initiatives in the *Draft Tasmanian Wild Fallow Deer Management Plan*, the TNPA recommends the following modifications and inclusions in the Plan:

- Changing the Wildlife and Deer Farming Regulations.
- Inclusion of Environmental Protection as a third goal and acknowledging legislative obligations for the protection of environmental values, biodiversity, threatened species, RAMSAR sites and public and private protected areas from deer impacts.
- Inclusion of specific population targets under deer population goals and a time frame to achieve these.
- Inclusion of an additional initiative under Management Objective 1 to manage deer as an invasive species and biosecurity risk.
- Replacement of the proposed 3 zones with more effective alternative zoning to protect environmental values state-wide and the TWWHA, Ben Lomond and Douglas-Apsley National Parks.
- Change Management Objective 2 to "Empower farmers, foresters and other private and public landowners to work collaboratively with Biosecurity Tasmania to achieve tailored deer management objectives".

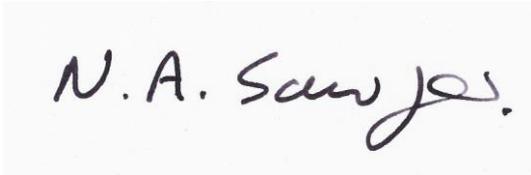
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The TNPA acknowledges the First Nation peoples of lutruwita (Tasmania) and their enduring connection to country. We pay our respects to their elders past and present. We also acknowledge that their land was taken, and sovereignty was not ceded.

- Strengthen Management Objective 3 by stating specific management initiatives and actions (in addition to monitoring, data collection and research), to protect environmental values state-wide and in protected areas.
- Commit adequate and ongoing financial resources for successful implementation of the plan's goals and objectives.
- Align the plan's goals and objectives with the *National Feral Deer Plan* and recommendations of the 2019 Senate Enquiry into the Impact of feral Deer, Goats and Pigs in Australia.

Additional considerations are listed on the following pages.

Yours sincerely,

A handwritten signature in black ink on a light grey rectangular background. The signature reads "N. A. Sawyer." with a period at the end. The letters are cursive and fluid.

Nicholas Sawyer, President, TNPA

1. POSITIVE INITIATIVES IN THE 2021 DRAFT PLAN.

It is positive to see the concept of zoning given consideration in the *Draft Tasmanian Wild Fallow Deer Management Plan 2021* (DPIPWE 2021a) and adoption of culling approaches (described as “light touch” in Zone 3 in the draft plan).

The TNPA supports the draft plan’s Management Objective 4, to improve community education relating to deer management and building community partnerships. The TNPA recognises that Government agencies such as DPIPWE require community involvement to implement an effective deer management plan.

2. WILDLIFE AND DEER FARMING REGULATIONS.

The TNPA notes that the new regulations have not been released concurrently with the *Draft Tasmanian Wild Fallow Deer Management Plan 2021*. A future Plan must remove the partially protected status of deer in the Wildlife Regulations and introduce effective deer farming controls to prevent escapes and reduce deer numbers and range.

3. GOALS OF THE DRAFT TASMANIAN WILD FALLOW DEER MANAGEMENT PLAN.

“Social” and “Deer Population” goals are outlined in the plan. While it is positive to note an intention to reduce the “risks to the natural and cultural values of Tasmania’s conservation reserve estate and other public and private lands”; Tasmania’s reserves, National Parks, and the TWWHA require a third goal, “Environmental Protection” to be included in the management plan to maximise protection of environmental values.

One obvious shortcoming of the stated deer population goals in the draft plan, is a lack of specific population targets for deer numbers across the state and the time frame to achieve this. The TNPA supports the view of the Invasive Species Council of a state-wide deer population goal of 10,000 by 2032 and confined to the core “traditional deer range” in the Midlands (Invasive Species Council 2021).

4. THE DRAFT PLAN’S MANAGEMENT OBJECTIVES.

The TNPA has significant concerns that a future *Wild Fallow Deer Management Plan* will fail to meet management objective 1 in the draft plan, (to effectively manage the impacts of wild fallow deer throughout the state), unless there is a policy shift to manage deer as an invasive species and biosecurity risk.

Therefore, management objective 2 in the draft plan should be altered, to clearly state the role of Biosecurity Tasmania as the lead agency, to work with all stakeholders, to implement state-wide deer management.

Another shortcoming of management objective 2 is that it does not explicitly state that private landowners and managers of public and private conservation reserves in proposed zones 1 and 2, will have access year-round to the same culling strategies available in proposed zone 3 to achieve protection of environmental values.

Management objective 3 (“continue to provide evidence-based deer management”) in the draft plan, fails to identify evidence-based actions that will be implemented to reduce deer population numbers. Evaluation tools such as population monitoring, data collection and research, while essential components of effective management, are insufficient on their own to provide evidence-based deer management. They need to be linked in the plan to specific, time-based targeted goals for the reduction of deer populations and protection of environmental values.

5. TASMANIA'S LEGISLATIVE OBLIGATIONS TO PROTECT THE NATURAL ENVIRONMENT.

A future *Tasmanian Wild Fallow Deer Management Plan* must be consistent with Tasmania's obligations under State and Commonwealth legislation and international agreements.

The Tasmanian government has a duty via the *National Parks and Reserves Management Act 2002* to manage Tasmania's reserved land to conserve natural biological diversity and to protect and rehabilitate national parks, the TWWHA and conservation reserves following adverse impacts from introduced species such as wild feral deer.

The *Nature Conservation Act 2002* states the purpose of Tasmania's reserves to include the conservation of natural biological diversity and values of areas that are unique, important or have representative value.

The *Threatened Species Protection Act 1995*, the Commonwealth's *Environmental Protection and Biodiversity Act 1999 (EPBC)* and international treaties such as the UNESCO World Heritage and Ramsar Conventions, also place obligations on Tasmania to manage its reserves to protect natural and environmental values.

State Governments such as Tasmania, have a responsibility to uphold Australia's commitment to protect biodiversity via the *International Convention on Biodiversity (CBD)* and to implement key actions of the *National Strategy for the Conservation of Australia's Biodiversity 2019 -2030* (Commonwealth of Australia 2019).

The TNPA recommends inclusion of these legislative obligations under a separate Goal, "Environmental Protection".

6. ZONING FOR THE TWWHA, BEN LOMOND & DOUGLAS APSLEY NATIONAL PARKS.

DPIPWE's *draft Tasmanian Wilderness World Heritage Area Biosecurity Strategy 2021 – 2031* recognises that deer impacts in the TWWHA are now recognised as a higher risk (DPIPWE 2021b).

The TNPA supports zoning as a management tool to manage invasive species such as wild feral deer. However, the proposed 3 zoned approach in the *Draft Tasmanian Wild Fallow Deer Management Plan* is not supported, as it is unlikely to reduce deer impacts state-wide, particularly in the TWWHA, Ben Lomond, and Douglas-Apsley National Parks; and in other conservation reserves, RAMSAR sites and areas with threatened vegetation communities in proposed Zones 1 and 2.

Visitors to Tasmania's national parks, the TWWHA and other reserves expect to see outstanding natural values, native plants and animals and unique features. Failure to prevent or reverse the environmental damage caused by deer will degrade the visitor experience.

All areas of the TWWHA, Ben Lomond and Douglas-Apsley National Parks should be included in an eradication zone where "no deer" rather than "sustainable hunting or mixed management" is the primary management objective. Objectives in proposed zones 1 and 2 favour recreational hunting, and maintenance of a deer herd, a strategy that has resulted in the current unsustainable increase in deer numbers in Tasmania and escalating damage to environmental values.

The TNPA does not support the 3 zoned approach in the *Draft Tasmanian Wild Fallow Deer Management Plan*.

The TNPA supports a more nuanced approach to zoning as outlined by The Invasive Species Council. This alternative zoning includes a prevention zone and two

eradication zones (A & B) with the objective to remove deer from Zone A within 5 years and prevention of re-colonisation, and the objective of Zone B to remove deer within a ten-year period and prevention of re-colonisation. This enhanced zoning plan will protect Ben Lomond and Douglas-Apsley National Parks, the prevention zone of the TWWHA, Freycinet National Park and other conservation reserves. A central control and containment zone with buffering to prevent re-colonisation in the Eradication zone, and asset protection in areas with high conservation values (such as the Midlands biodiversity hotspot) is also supported (Invasive Species Council 2021).

The TNPA notes the Government's response to the 2017 Legislative Council enquiry into wild deer, and the Government's intention to eradicate deer populations in World Heritage and other conservation lands and to consider recreational hunters as a resource (DPIPWE 2017).

Reliance on recreational hunters to manage an invasive species such as deer in protected areas is ineffective and inefficient. The Victorian Government has recently completed a deer management trial in the Alpine National Park. The results indicate that aerial shooting is most effective; followed by on-ground professional shooting. Aerial shooting, 'Was shown to be very efficient with 119 deer taken over 15 hours of operation, which is an average of one deer per 7.6 minutes. This can be compared to one deer per 8.6 hours of operation of volunteer-based ground shooting, or one deer per 2.3 hours of contracted ground shooting.' (Victoria Questions on Notice 212 2021).

7. THREATENED VEGETATION COMMUNITIES AND RAMSAR WETLANDS.

The 2019 Senate Enquiry on the Impact of Feral Deer, Pigs and Goats in Australia, recommends that feral deer be listed as a standalone Key Threatening Process under the EPBC Act (Commonwealth of Australia 2021).

Fallow deer's environmental impacts include changes in vegetation structure because of browsing and grazing, altering the natural succession of saplings and seedlings, establishing weeds, and changing ground litter and nutrients. Other species such as birds are also at risk as the reduction in biodiversity reduces habitat and food resources for native species (IUCN 2021).

Fallow deer are not regarded as a threatened species.

In contrast, there are 7 threatened ecological communities in Tasmania currently listed under the Commonwealth's EPBC Act and include sphagnum peatland, *Eucalyptus ovata* – *Callitris oblonga* forest, lowland native grasses, and *Eucalyptus ovata* / *E. brookeriana* forests and woodlands. Unfortunately, these communities are vulnerable to impacts from deer. (DAWE 2021a).

At least 650 animal and plant species are listed as currently threatened in Tasmania and are listed on the schedules of the *Threatened Species Protection Act 1995*. (DPIPWE 2021c).

The *Nature Conservation Act 2002* lists 39 threatened vegetation communities (16 non-forest and 23 forest). (DPIPWE 2021c).

As feral deer are estimated to have spread to 27% of Tasmania, with an unsustainable annual growth rate approaching 11.5 % and the potential of the deer population to spread to 56% of Tasmania (Cunningham et al 2021), "high level" immediate initiatives are required to protect Tasmania's environment, individual threatened species and vegetation communities. After reviewing the available evidence to date, the Invasive Species Council estimates a current deer population approaching 100, 000 (Invasive Species Council 2021).

In recognition that wild deer are a threatening process, the 2019 Senate Enquiry into the Impact of Feral Deer, Pigs and Goats in Australia, recommended preparation of a

Threat Abatement Plan for threatened species and vegetation communities). The TNPA supports this as a “high level” initiative for inclusion in the *Tasmanian Wild Fallow Deer Management Plan* (Commonwealth of Australia 2021).

As a signatory to the Ramsar Convention on Wetlands of International Importance, Australia and State governments have an obligation to protect Ramsar listed wetlands. The Ramsar Strategic Plan’s 2016 -2024 Target 4, states that Australian States and Territories will identify and manage threats from invasive species (Ramsar 2015).

Tasmania’s internationally recognised Ramsar sites include Interlaken Lakeside Reserve near Tunbridge, The Apsley Marshes and Moulting Lagoon on the East Coast of Tasmania (DAWE 2021b).

A future *Tasmanian Wild Deer Management Plan* needs to identify actions and resources to protect these Ramsar sites and their values.

8. RAPID EMERGENCY RESPONSE PLAN POST BUSHFIRES TO CULL DEER.

Invasive species such as feral deer, rapidly move into new areas after bushfires and prevent the recovery of ecosystems because of their grazing and browsing pressures (DELWP 2020).

In recognition of these threats, the Victorian Government implemented a rapid emergency response to protect threatened species and recovering vegetation in the State’s protected areas (DELWP 2020). The TNPA supports adopting a similar “high level” initiative in the *Tasmanian Wild Fallow Deer Management Plan* to protect environmental values and to reduce deer populations in recovering ecosystems.

9. FINANCIAL RESOURCES TO IMPLEMENT THE PLAN.

Placing responsibility for implementation of the *Tasmanian Wild Fallow Deer Management Plan*, with Biosecurity Tasmania, will more closely align the plan’s goals and objectives with those of the Parks and Wildlife Service and Natural and Cultural Heritage organisational groups in DPIPWE, thus saving financial resources.

The 2019 Senate Enquiry on the Impact of Feral Deer, Pigs and Goats in Australia recommended that Commonwealth, State and Territory Governments should ensure adequate long-term funding for Deer Management (Commonwealth of Australia 2021).

The National Feral Deer working group estimate that Fallow deer in Tasmania cost the state’s agricultural industry at least \$10 million annually and that a minimal Foot and Mouth Disease outbreak, could cost Australia around \$7.1 billion, while a large 12-month outbreak would cost \$16 billion (CISS 2021).

The Invasive Species Council (2021) estimates that the social, economic, and environmental costs of feral deer in Tasmania, are approximately \$100 million annually. The TNPA supports an immediate \$1.8 million financial commitment to launch the plan, as suggested by the Invasive Species Council.

10. NATIONAL GUIDELINES.

The TNPA recommends that the *Tasmanian Wild Fallow Deer Management Plan* incorporates the recommendations of the 2019 Senate Enquiry on the Impact of Feral Deer, Pigs and Goats in Australia and that the plan nominates Biosecurity Tasmania as the Tasmanian representative on the National Feral Deer Action Plan working group.

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