Tasmanian National Parks Association

An independent Voice for Tasmania's Parks

10 December 2020

Project Manager
Wild Fallow Deer Management Plan Project
DeerManagementPlan@dpipwe.tas.gov.au

Tasmanian Wild Fallow Deer Management Plan

The main concern of the Tasmanian National Parks Association (the TNPA) is the management of Tasmania's national parks and other conservation reserves, but the control within reserves of a highly mobile species such as deer cannot be achieved without consideration of their management in the rest of the state.

The TNPA notes that DPIPWE's recently released [draft] *Tasmanian Wilderness World Heritage Area Biosecurity Strategy 2021-2031* includes deer in its list of 'species previously assessed as low-risk [which] may now present a higher risk due to changing environmental conditions or new knowledge about their impacts'. This strategy was prepared in response to a requirement contained in the statutory 2016 management plan which emphasises the risk posed to world heritage values by introduced species. This new assessment by the relevant authority of the risk posed by deer requires an immediate response if damage is to be minimised.

The Government stated in response to the 2017 Legislative Council inquiry into wild fallow deer that it supports the objective to 'eradicate deer populations in World Heritage and other areas classified as conservation land and consideration be given to recreational hunters as a resource'.

> The TNPA strongly supports the first part of this objective, namely the eradication of deer within all conservation reserves. However, successful eradication will require a professionally managed, evidence based, pest management program. The TNPA is particularly concerned that the eradication of deer within reserves will be used as an excuse to permit an expansion of recreational hunting on reserved land.

The Government's response to the Legislative Council inquiry also included a commitment for 'DPIPWE to work with research partners on a project that will assess the distribution and numbers of wild fallow deer in all parts of the TWWHA'.

> To the best of TNPA's knowledge there has been little progress on this, and the recent aerial census did not extend beyond the known 'traditional range' of wild deer and so contributed little new information regarding the TWWHA. Better understanding of numbers/distribution and actual/potential impacts on sensitive ecosystems in all reserves is essential to an effective eradication program, and long overdue.

The DPIPWE website states that 'The plan will be developed on the basis of wild fallow deer remaining a partly protected species under the Wildlife Regulations'.

> The current widespread distribution of deer reflects decades of management as a 'partly protected species' (i.e. a 'resource' for hunting). Effective control will require recognition that they are a feral pest which needs to be strictly controlled as such, at least within and adjacent to reserves.

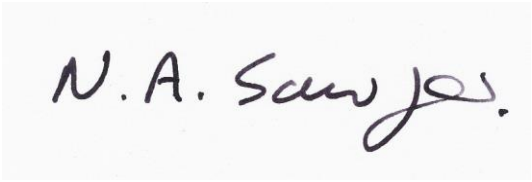
Postal address: GPO Box 2188, Hobart Tasmania 7001
Email: info@tnpa.org.au • Web: www.tnpa.org.au

To summarise, the Wild Fallow Deer Management Plan must facilitate or provide for the following:

- **Deer must be eradicated within all conservation reserves and controlled elsewhere so that they cannot spread into reserves in the future.**
- **This can only be achieved by an evidence based and appropriately-resourced pest management program, not a relaxation of the rules governing recreational hunting on reserved land.**
- **Better information on the numbers, distribution and impact of deer is fundamental to such a pest management program and hence is urgently needed.**
- **To facilitate the eradication of deer in conservation reserves, consideration must be given to changing the 'partly protected' status of wild fallow deer.**

We provide further justification and additional specific recommendations for the Wild Fallow Deer Management Plan in our supporting information on the following pages.

Yours sincerely,



Nicholas Sawyer, President, TNPA

Supporting Information

This submission from the Tasmanian National Parks Association (TNPA) provides comment on the proposed Wild Fallow Deer Management Plan, with a focus on managing wild fallow deer impacts on natural and cultural values within Tasmania's system of parks and reserves under the *Nature Conservation Act 2002.* The submission will also comment on the four key issues identified by the Department of Primary Industries, Parks, Water and Environment (DPIPWE) as they relate to wild fallow deer:

- Supporting the needs of recreational deer hunters and ensuring the future of recreational hunting in Tasmania
- Managing wild fallow deer impacts on private or primary production land
- Managing wild fallow deer impacts on natural and cultural values
- Managing satellite wild fallow deer populations, particularly in areas currently free from wild fallow deer.

Recommendations:

1. The Tasmanian environment, especially its national parks and other conservation reserves, requires the Tasmanian Government to take immediate action to protect natural habitat, ecosystems, endemic and threatened species from the current and forecast escalating impacts of the unsustainable fallow deer population.
2. The current system of game management utilising a Quality Deer Management (QDM) approach is no longer an appropriate, relevant, sensible, or environmentally and economically sustainable policy to manage the growing population of wild fallow deer.
3. An evidence based pest management and bio-security approach is the policy of the majority of Australian states and the Federal Government. Tasmania's Wild Fallow Deer Management Plan now requires this responsible approach.
4. Wild Fallow deer management requires comprehensive multiagency expertise, with Biosecurity Tasmania, DPIPWE's Invasive Species Branch, the Parks and Wildlife Service and the Scientific Advisory Committee (Threatened Species) collectively taking a lead role with Game Services Tasmania to create a new Wild Deer Management Plan. The objectives of Game Services Tasmania require modification to reflect pest management as a primary goal.
5. Wild Fallow Deer must be declared a pest species. Deer should no longer be classified as partially protected wildlife under the *Wildlife (General) Regulations 2010.*
6. Hunting regulations on private land and on leased Crown land should be changed to recognise fallow deer as a pest species to reduce the population of wild fallow deer to more environmentally-sustainable levels and to prevent deer moving into environmentally sensitive habitat, parks and conservation reserves.
7. Expansion of commercial farming of fallow deer is not supported as there have been documented escapes which have established satellite populations that now threaten the natural environment.
8. Wild fallow deer in national parks and reserves should be managed as an urgent biosecurity issue, by an adequately resourced Parks and Wildlife Service utilising an evidence-based evaluated professional pest management approach. Eradication and removal of wild fallow deer should be the management objective.
9. The use of unsupervised recreational hunters for pest management in national parks and reserves is not supported. Unlike planned and co-ordinated pest management, recreational hunting lacks specific measurable objectives, planning, monitoring or assessment of efficacy.
10. Once deer are removed from parks and reserves, control lines should be established and hunting efforts in adjacent areas should be intensified to prevent reinfestation.

11. Conservation values in Game Reserves currently accessed by hunters should be assessed, and those reserves with the highest conservation values should be prioritised for professional deer culling before conservation values are further damaged by deer.

Key Issues:

Supporting the needs of recreational hunters and ensuring the future of recreational hunting in Tasmania:

Declaration of deer as a pest species will ensure a greater opportunity for recreational hunters to target deer on private land and leasehold Crown land as all landowners will then have a responsibility to manage deer as a damaging pest species. Pest status will allow removal of the current restrictive hunting season, reduce red tape, provide greater access to hunting opportunities throughout the year, allow use of spotlights, and most importantly, remove current restrictions on the hunting of bucks, stags and immature male deer.

The recent deer census has indicated a deer population of at least 54,000. The National Environmental Research Program (NERP) Landscapes and Policy hub has stated that retaining the current rate of culling by licensed hunters will make little difference to the size of the wild deer population into the future. In comparison, a pest management approach will increase hunting opportunities as will changing the *Wildlife (General) Regulations 2010* to allow hunting deer at night.

Many recreational hunters express frustration with the current regulations. Some hunters face criminal sentences and substantial fines for not abiding by the regulations to take only one male deer or restricting their hunting activities during the gazetted open season.

Notwithstanding the above, the TNPA does not support expansion of recreational hunting in the TWWHA or in reserves not currently open for recreational hunting, nor do we consider an expansion or recreational hunting opportunities alone to be a desirable or effective way to control and eradicate wild deer populations.

Managing wild fallow deer impacts on private or primary production land:

Declaration of deer as a pest species will facilitate the reduction of populations and spread of wild deer on private/primary production land and in grazing leases on Crown Land. In addition, many private landowners and primary producers will be better able to protect biodiversity values and associated economic benefits on their properties. This includes private land that has been declared as Private Nature Reserves, Private Sanctuaries and Areas Covenanted for Conservation. The recently appointed National Feral Deer Co-ordinator is one of many resources available to assist primary producers and private landowners to more appropriately manage wild fallow deer as a damaging pest species. The current system of issuing Crop Protection Permits for 5 years, while reducing the administrative burden for primary producers, is ineffective as a control measure, as primary producers are still restricted to culling only during March to November.

Managing wild fallow deer impacts on natural and cultural values:

The new Wild Fallow Deer Management Plan must support the principles underpinning the *2013 – 2030 Natural Heritage Strategy for Tasmania*. These include principles that Tasmania's Natural Heritage has intrinsic value; that in situ conservation of natural heritage is a priority; that effective conservation of Natural Heritage operates at the landscape scale across public and private land tenures, and that application of the precautionary principle is recommended to ensure that Tasmania's natural heritage is maintained for future generations. Priority actions also include strengthening environmental biosecurity to manage invasive species.

The recent census of wild fallow deer, while welcome, only covered part of the State considered traditional deer range and estimated the population as approximately 54,000.The state wide population of wild fallow deer is clearly likely to exceed this, as the survey was conducted at the end of the hunting and crop protection permit season (when population is at its lowest) and omitted north west Tasmania,

the Dover area in the south, and Bruny and King Islands, all areas where deer sightings have been reported. The deer survey suggests that population is increasing at a rate of approximately 5.4% annually. A risk assessment analysis modified and applied by DPIPWE in 2011 indicated fallow deer as an extreme biosecurity risk once established in Tasmania.

Modelling by the Landscapes and Policy hub of the National Environmental Research Program has indicated that, unless the current deer management policy is radically changed, the deer population in Tasmania is ready to "explode" and could exceed 1 million mid-century. With increasing population, the current deer management policy will not work to prevent deer moving further outside their "traditional range" into national parks and reserves, conservation areas and the TWWHA.

The Government's recent statement to the Senate Environment and Communications Committee that it intends to estimate wild deer abundance in parks and reserves, including the TWWHA, is welcome. But this was also a stated objective in the Government's response to the earlier Legislative Council's 2017 inquiry with a commitment for "DPIPWE to work with research partners on a project that will assess the distribution and numbers of wild fallow deer in all parts of the TWWHA". Progressing this project is now urgent.

The Government also stated in response to the 2017 Legislative Council enquiry that it supports objectives to "eradicate deer populations in World Heritage and other areas classified as conservation land and that consideration be given to recreational hunters as a resource". The TNPA does not support expansion of recreational hunting into these areas as recreational hunting is an ineffective control measure. Alternatively, the Tasmanian Government has the option to fully supervise, resource, train and deploy professional hunters as part of a planned eradication strategy.

The RSPCA's recent position paper on the efficacy of recreational hunting for pest management (see here) clearly states that a recreational hunting strategy is inferior to the use of co-ordinated planned pest management. Planned pest eradication can also be carried out more efficiently meaning that closure of reserves on public safety grounds can be for a minimal period. A pest management approach does not just rely on shooting as a control measure; properly planned pest eradication programs use a variety of strategies; shooting is one available tool. Some States have accredited training for shooters before they are employed as professionals for planned pest management programs. In 2015 the WA government rejected a plan to trial recreational shooting in national parks and in 2014 the NSW government commenced a 3 year trial permitting volunteer licensed hunters, supervised by PWS staff, to shoot declared pest species.

DPIPWE's promotion of the DeerScan application to assist members of the public to report deer sightings is an important tool. DPIPWE staff participation in the recent aerial survey conducted by EcoKnowledge is also welcome. All census methods, including further aerial surveys, citizen science monitoring and camera traps must be adequately co-ordinated, resourced and planned, utilising best practice methodologies and require oversight by the Scientific Advisory Committee (Threatened Species), Biosecurity Tasmania and the Parks and Wildlife Service. A deer census in national parks and reserves (see previously) must be prioritised so that planned pest eradication and containment plans can be put in place to ensure deer populations are ultimately confined to their traditional ranges. The Government previously stated this as an objective in response to the 2017 Legislative Council review.

The impacts of fallow deer on natural and cultural values are well documented. A 2005 DPIPWE baseline monitoring program reported on deer distribution and abundance in the Central Plateau Conservation Area and adjacent areas. This area now falls within the TWWHA and the presence of pest species is highly concerning, as it undermines the world heritage values that led to the creation of the TWWHA. Deer have the potential to spread further into the world heritage area. They have the potential to compete with native species for food, directly damage habitat and the composition of populations of native species, compound the threat of weeds and soil erosion, spread *Phytophthora cinnamoni* and negatively affect cultural values such as ancient middens. Ground nesting or dwelling birds can be threatened by habitat destruction. Deer are heavy grazers, destroy small trees and shrubs by rubbing from antlers and could move into new areas after bushfires and trample sensitive bogs and wetlands. These impacts can also diminish the wilderness experience for visitors who come to Tasmania to experience the outstanding natural and cultural values of the TWWHA.

Tasmania's alpine national parks and the Central Plateau provide habitat for many rare plant species such as Pencil Pines and the Cider Gum. Deer are known to eat regenerating seedlings and destroy shrubs and small trees during the deer breeding season, by thrashing vegetation. Deer eradication in reserves such as the Walls of Jerusalem National Park should be prioritised. The landscapes and policy hub of the National Environmental Research Program (NERD) has assessed that the TWWHA is at high risk, as fallow deer "could live anywhere in Tasmania except, perhaps, the densest and wettest forests".

Deer occur in a variety of habitats and will substitute different habitats to access food resources; may compete with macropods for access to food and, as they are selective grazers, they can change the composition of vegetation communities. As deer are highly adaptable, there is the potential for deer expansion into many new areas as abundance increases.

Recognition by DPIPWE, that fallow deer are a priority introduced species requiring monitoring, is noted. The TNPA welcomes the reported pilot survey utilising remote cameras in the Great Western Tiers Conservation Area and the Central Plateau Conservation Area and the eventual release of the survey data. DPIPWE's partnership with the Australian Research Council's (ARC) linkage grant to further investigate deer habitat preferences and impacts of fallow deer on native vegetation and associated interactions with fire is also welcome.

Unfortunately wild fallow deer have the potential to spread throughout the Central Plateau Conservation Area and beyond. Newer Deer Ballot locations have been declared at Brenton Rivulet and Mother Lord Plains (Central Plateau Conservation Area); Tumbledown Creek and Gunns Marsh (Great Lake Conservation Area adjacent to the Central Plateau Conservation area and Hydro land) and at Parson and Clerk Mountain (nearby Great Western Tiers Conservation Area) . These are additional to the traditional deer ballot locations at Top Marshes Conservation Area and Five Mile Pinnacles Conservation Area (south of the Central Plateau Conservation Area.) Professional culling should also supplement recreational hunting if required, in any existing Deer Hunting Zones, to limit the spread of deer into high conservation value reserves.

The TNPA does not support any further expansion of recreational hunting zones and additional Deer Ballot locations in Public Reserves as a management response to the further spread of fallow deer. Unless a reserve was specifically declared with the prime purpose of being a Game Reserve, or has been part of the traditional Hunting Zone; other reserves managed by the PWS such as National Parks, State Reserves, Nature Reserves, Conservation areas, Nature Recreation areas, Regional Reserves and Historic Sites that currently do not permit or host deer hunting, should retain their original management objective(s) and focus. Professional eradication of deer in these reserves should be an objective.

Managing satellite wild fallow deer populations, particularly in areas currently free from wild fallow deer:

Management of satellite populations is essential to limit the spread of fallow deer outside their traditional range. The TNPA supports the Tasmanian Government's previous 2017 statement to vary fawning season restrictions where targeted and regulated population control measures need to be undertaken by DPIPWE for satellite populations, or in conservation areas such as the TWWHA, to prevent further expansion of wild fallow deer into conservation areas. Declaration of fallow deer as a pest species and utilising a professional, planned and evaluated strategy to manage satellite populations and eradicate deer from national parks and reserves is overdue. For example, satellite populations have established on King and Bruny Islands; reportedly escaping from a deer farm in 2007 in the former area. Deer also have the potential to degrade Douglas-Apsley National Park and Freycinet National Park, as nearby satellite populations are known. These areas require regular surveying of deer populations and targeted professional culling. Furthermore, the recent deer census did not include North West Tasmania's reserves and this area should also be managed as a satellite population.

Conclusion:

Wild fallow deer, **(***Dama dama*), have the potential to further invade significant areas of Tasmania including the TWWHA, national parks and other reserved land. National parks and reserves, including the TWWHA, are a refuge for a wide range of rare and threatened species. The TWWHA Management Plan and draft TWWHA Biosecurity Strategy clearly state incursions of invasive species are a major threat to the TWWHA. Failure to implement an effective Wild Deer Management Plan, with pest management as a primary objective, threatens the environment, including the aforementioned species and habitat, and also has the potential to degrade the cultural values of the TWWHA. Habitat degradation detracts from the requirements for quality presentation experiences for the public.

The current Wild Fallow Deer Management Plan is ineffective in controlling the damaging impacts of wild deer. The Tasmanian National Parks Association urges the Tasmanian Government to take action now to put in place a new Wild Fallow Deer Management Plan that will address the concerns noted in this submission.

References:

https://parks.tas.gov.au/about-us/managing-our-parks-and-reserves/reserve-listing

https://tnpa.org.au/

https://www.utas.edu.au/__data/assets/pdf_file/0008/628901/TAS-Deer-Modelling-Summary.pdf

https://parlinfo.aph.gov.au/parlInfo/download/media/pressrel/7609659/upload_binary/7609659.pdf;fileType=application%2Fpdf#search=%22feral%20deer%20coordinator%20david%20littleproud%20media%20release%22

https://dpipwe.tas.gov.au/Documents/Government%20Response%20to%20Leg%20Co%20Report%20on%20Wild%20Fallow%20Deer.pdf

https://dpipwe.tas.gov.au/conservation/publications-forms-and-permits/publications/fallow-deer-monitoring

http://www.tasconservation.org.au/tas-conservationist/2018/1/16/fallow-deer-in-the-tasmanian-wilderness-world-heritage-area

file:///C:/Users/User/Downloads/Pottsetal2015PredictingthefuturerangeandabundanceoffallowdeerinTasmania_WR%20(1).pdf

https://dpipwe.tas.gov.au/Documents/Fallow-Deer-Species-Profile.pdf

https://www.researchgate.net/publication/230067937_Vegetation_of_the_alpine_sand_dunes_at_Lake_Augusta_Tasmania

https://kb.rspca.org.au/knowledge-base/is-recreational-hunting-an-effective-form-of-pest-animal-management/