

30 June 2021

Chair of the Wildlife Act 1975 Review Panel

Department Environment Land Water Planning

Dear Dr Peterson

Thank you for the opportunity to make a submission to the Wildlife Act 1975 Review.

The Centre for Invasive Species Solutions (CISS) is Australia's collaborative research, development and extension organisation formed to tackle the ongoing threat from invasive vertebrate pests, and weeds.

Feral deer (termed 'wild deer' in Victoria and Tasmania) are increasingly a problem for land managers, causing significant socio-economic, and environmental impacts. Across Australia, the distribution and abundance of feral deer have increased to a point that existing control tools, legislative arrangements and strategies are inadequate to control their impacts.

Feral deer are now well established in Victoria, New South Wales, Tasmania, and parts of South Australia and Queensland and it will take immense efforts to slow the growth of the populations. Projections of feral deer population growth and spread indicates that feral deer impacts will continue to worsen in most states of Australia.

In recent years, local, state and Commonwealth governments, other organisations and land managers have invested many millions of dollars into feral deer management, culling programs, and research to tackle the problem.

To build on this momentum, CISS recently initiated the National Feral Deer Coordinator project, which is funded by the Australian Government and is being led by the Department of Primary Industries and Regions SA. This CISS project commenced in October 2020. The project will deliver a National Feral Deer Action Plan, promote the need to manage impacts of feral deer, and build capacity to control feral deer at local, state and national scales. The Coordinator model has been adapted from the foundational work of the National Wild Dog and Feral Pig Management Coordinators.

Feral deer frequently move across many properties, so the effectiveness of control on individual properties is greatly reduced unless groups of neighbours participate and coordinate their efforts using best practice strategies. The National Deer Management Coordinator is seeking to facilitate better coordination of control activities in areas impacted by feral deer. This coordination task is considerably more difficult in locations where local legislation does not support or encourage *all* land managers to control feral deer.

Legislation for the management of feral deer differs across Australia. In Queensland, New South Wales, South Australia, the Australian Capital Territory and Northern Territory, feral deer are classified as pests under relevant legislation. Landholders are legally obliged by biosecurity or pest animal legislation or by regulations to cull feral deer. In New South Wales, some areas of public land are also designated to provide recreational hunting opportunities.

In Tasmania and Victoria, deer are managed primarily as a resource for recreational hunters. Land managers can choose to cull feral deer on their individual properties under strict seasonal and regulatory arrangements, and feral deer can be culled in National Parks.

A nationally consistent approach to managing feral deer as a pest is needed, in the same way as other established pest animals such as feral pigs, rabbits and foxes. Such a nationally consistent approach would also enable feral deer to be considered for listing as an Established Pest Animal of National Significance under the Australian Pest Animal Strategy (APAS) 2017-27, which would strengthen nationally coordinated action to reduce feral deer impacts, and would be supported by CISS.

As with feral pigs (managed as pests in all states), increased efforts to manage feral deer impacts under a pest status will not remove hunting opportunities. There are many locations and opportunities to recreationally hunt feral pigs, and at the same time, land managers and agencies can readily coordinate landscape scale programs to control their impacts.

CISS supports the Wildlife Act 1975 Review to remove the requirement that all deer species be protected from control, so that the growing impacts of feral deer can be contained, and so a nationally consistent approach to managing them can be sought. This mechanism will facilitate more effective, long-lasting control of feral deer impacts at landscape scales in Victoria, and better protect priority assets of environmental, agricultural or cultural value.

CISS also supports the recommendations of the recent *Senate Inquiry into the Impacts of Feral Deer Pigs & Goats in Australia*, and would encourage the Wildlife Act Review to consider these recommendations for the management of feral deer in Victoria, particularly Recommendation 8. Relevant recommendations include:

Recommendation 6: The committee recommends that a standalone Key Threatening Process listing for feral deer under the EPBC Act be adopted, accompanied by a Threat Abatement Plan, to elevate the focus on controlling deer impacts.

Recommendation 7: The committee recommends that the Department of Agriculture, Water and the Environment report annually to Parliament on the status of all Key Threatening Processes (KTPs) listed under the EPBC Act, along with information on what monitoring and management activities have been undertaken under Threat Abatement Plans associated with KTPs.

Recommendation 8: The committee recommends that all Australian jurisdictions make any necessary changes to their existing legislative and regulatory frameworks to:

- ensure that wild deer are treated as an environmental pest;
- maximise the ability of landholders to control feral deer on their land; and
- maximise the ability of park managers to control feral deer in World Heritage Areas and National Parks.

Recommendation 9: The committee recommends that Commonwealth, state and territory governments should commit to eliminating feral deer populations in World Heritage Areas, areas of national environmental significance, and national biodiversity hotspots.

Yours faithfully

Andreas Glanznig
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