

29 June 2021

Chair - Dr Deborah Peterson
Wildlife Act 1975 Review Panel
Department Environment Land Water Planning

WILDLIFE ACT 1975 REVIEW SUBMISSION

Dear Dr Peterson

My wife and I are beef cattle farmers in southern Victoria. We are constantly grappling with the exponentially increasing feral deer population in our district. The deer are not only affecting our farming enterprise through consumption and destruction of pasture, but are also dramatically affecting the biodiversity in the coastal reserves and other bushland in the district. They are also a real threat to human safety, due to increasing deer-vehicle collisions and human interactions.

The objectives of the Wildlife Act to protect feral deer for game hunting is totally inappropriate and inconsistent with other government policy and legislation. There is confusion both in government and the community from the fact that feral deer are protected as game under the Wildlife Act, whilst there are exemptions allowing deer to be "unprotected", but only on private land and not including Hog deer. Public land managers currently must seek an 'Authority to Control Wildlife', to permit the removal of an introduced feral pest, to protect biodiversity and wildlife habitat in conservation areas.

Allowing feral deer to remain as 'game' under the Wildlife Act 1975 in Victoria because they are *'already established in the wild in Victoria and beyond eradication with current control methods'*, is inconsistent with how we approach other pest animal management eg. rabbits, foxes and pigs. In the wild, feral deer and each of these other animals are invasive pests and should be unequivocally recognised as such.

All feral deer species in Victoria need to be removed as 'game' under the Wildlife Act 1975 for the following reasons:

1. Feral deer are now an established, self-sustaining invasive pest, destroying Victoria's biodiversity and wildlife habitat, with the potential to establish across the entire continent;
2. Legislation and policy for invasive species should be consistent and clear across land tenure. Currently there is confusion in policy and legislation as to how deer should be managed;
3. It is important that the legislation and policy for feral deer management be in alignment across Australia to ensure consistency of management practices and best possible options to reduce the serious impacts of feral deer.
4. The nomination of deer as protected 'game' under the Wildlife Act 1975 was made when deer were far fewer in number and were deemed in need of protection for recreational hunting purposes;
5. To dispel the misnomer that this will threaten sustainable game deer populations, given the exponential growth rate of feral deer in Victoria;
6. It is a contradiction to protect an introduced game species under the same Act that also protects Victoria's indigenous wildlife. Feral deer are a direct threat to the wildlife and habitat that the Wildlife Act is aiming to protect;
7. Feral deer have also been proven vectors of disease for wildlife and stock and should be legally defined as a biosecurity threat and managed accordingly;

8. State government management of feral deer would be more effective, as currently biosecurity officers are not authorised to assist with deer management. At this critical point of feral deer populations increasing, all potential resources should be available to halt further dispersal;
9. More opportunities for research into alternative control methods are likely to be realised;
10. Feral deer are also known to spread a *Phytophthora*, which is widespread in the peri-urban areas of Melbourne and causing dieback of native trees and wildlife habitat;
11. The change of the status of deer in other states, has proven to raise awareness of the serious impact of feral deer and has increased management action by private landholders;
12. Pest status would support the establishment of a compliance regime to prevent the deliberate transport of feral deer to new areas;
13. It is unethical to maintain and protect pest animal populations that are causing environmental destruction and economic hardship for the Victorian community.

The Review should also take into account the recently released recommendations from the *Senate Inquiry into the Impacts of Feral Deer Pigs & Goats in Australia*, 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.

Thank you for providing me with the opportunity to make this submission.

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