

24<sup>th</sup> June 2016

Ms Jenny Mannering  
Inquiry Secretary  
Legislative Council  
Parliament House  
Hobart TAS 7000

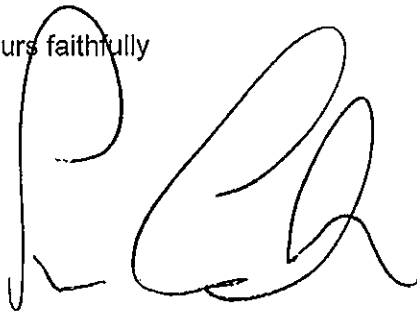
Dear Ms Mannering

**Subject: Legislative Council Inquiry Into The Wild Fallow Deer Population in Tasmania**

Please find attached the submission from Forico Pty Limited (Forico) with respect to the current Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania. Forico appreciates the opportunity to provide a submission.

If the Parliamentary Committee requires additional information, or clarification, then please do not hesitate to contact me.

Yours faithfully



Simon Cook  
Certification and Compliance Manager

# **Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania**

## **Submission by Forico Pty Limited**

### **Introduction**

Forico Pty Limited (Forico), is Tasmania's largest private forest manager. We appreciate the opportunity to provide a submission as part of the ***Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania***.

As advertised by the Parliamentary Committee, Forico will provide commentary within this submission to address the following Terms of Reference relating to the inquiry:

- *"Environmental impacts on public and private land;*
- *Any impact on commercial activities on private land;*
- *The partly protected status of fallow deer under the Wildlife (General) Regulation 2010;*
- *Commercial opportunities for the use of wild population stocks; and*
- *Any matters incidental thereto."*

As part of Forico's engagement with a broad and diverse range of stakeholders, it is clear that there is a consensus when discussing wildlife management responsibilities across a cross-tenured landscape, specifically in relation to the wild fallow deer population, that there needs to be collaboration and co-operation. Forico's interested and affected stakeholders consulted included, but not limited to: (i) Landowners; (ii) Neighbours; (iii) Forest Industry Managers; (iv) Government and Statutory Bodies; (v) Contractors; (vi) Non-Government Organisations; (vii) Environmental Non-Government Organisations; (viii) Associations and Peak Bodies; (ix) Recreational and Professional Hunters.

### **Background**

Forico manages approximately 180,000 hectares of land throughout Tasmania. This management area is defined as the Forest Management Unit (FMU). The Forico FMU consists of (i) the plantation resource (100,000 hectares) and (ii) natural forest (80,000 hectares). The natural forest component of the estate is being managed for conservation and biodiversity values. Forico is committed to sustainable forest management principles, and this can clearly be demonstrated through compliance with independent, globally recognised, external third party Certification Schemes:

- The Australian Forestry Standard. The Australian Forestry Standard is endorsed through the global PEFC (Programme for the Endorsement of Forest Certification);
- The Forest Stewardship Council Forest Management Standard; and
- ISO 14001 (Environmental Management System) Standard.



In addition to aligning to these Certification Standards, Forico must demonstrate compliance to legislation and regulation both at a State and a Federal level. Through the commitment to sustainable forest management principles, Forico plantation estate is managed to achieve sustained harvest yields. The principle of achieving a healthy and viable resource is equally relevant within the natural forest estate – to ensure that natural ecosystem values are promoted (e.g. within native forest and native grassland areas).

Fallow deer are located in significant numbers throughout the FMU – Barrington, Waratah, Riana, Blessington, Fingal, Campbell Town, Lake Leake, Central Highlands and Western Tiers. The potential for widespread and severe browsing damage from deer to newly planted seedlings is considered to be high. Fallow deer are classified as partly protected under the *Wildlife (General) Regulations 2010*, and as such may only be hunted under a specific purpose game licence or crop protection permit.

The Forico plantation resource is systematically harvested and replanted to maintain the health and viability of the productive component of the FMU. Providing the seedling with the maximum opportunity to survive is critical to achieve a healthy, viable and productive crop. Operations at the time of establishment, aim to:

- Remove excessive competition (weeds and debris) that may impede planting or impact on tree growth / development;
- Use appropriate site preparation techniques to cultivate the soil;
- Establish healthy tree stocks when weather and soil conditions are favourable;
- Ensure correct planting techniques are used;
- Application of controlled release fertilisers to optimise early growth;
- **Reduce mammal browsing pressures; and**
- Reduce competition from other vegetation through the judicious use of herbicides.

These series of identified operational activities cost in the region of **\$2,000** per hectare for plantation establishment. Each aspect of the plantation establishment cycle affects the productive capacity of the FMU and cannot be treated in isolation. Compromising one component of this program could potentially impact plantation survival.

### **Control Measures**

Forico understand the requirement to consider an integrated approach to ensure sustainable management objectives are being achieved. From an economic, environmental and social standpoint, Forico:

- Implements a tree improvement program to deploy species that generate optimal growth outcomes – to remove the necessity for costly intervention;
- Monitors plantation health and growth, to ensure (if required) intervention is initiated in a timely fashion;
- Establishes plantations generally at the time where soil temperature and growth potential is at its greatest (e.g. spring);
- Targets controlled release fertiliser applications to ensure enhanced initial plantation growth responses; and
- On high risk and vulnerable sites (e.g. exposed plantation edges) – fencing, netting, tree guarding and alternative control measures are considered to address browsing pressures.

Browsing animals, do not simply impact on agricultural crops or plantations in a commercial setting. Browsing animals can have devastating consequences associated with environmental protection endeavours. Within native forest landscape that are revegetated or rehabilitated to

maintain and / or enhance their biodiversity or conservation values, the effects of browsing mammals can have a deleterious impact on successful outcomes.

Specifically, in relation to the wild fallow deer population in Tasmania:

1. Forico supports the maintenance of a sustainable population of endemic fauna in Tasmania;
2. Forico maintains that fallow deer are an introduced species and consider that maintaining their broad protection status supports only a very small sector of the Tasmanian community and compromises other significant crop production and commercial values;
3. Forico supports an appropriately regulated wildlife meat processing industry in Tasmania, particularly where the animal is to be destroyed as part of an authorised crop protection process; and
4. Forico respects the premise that deer hunting is a valid recreational component of the Tasmanian community. Accordingly, Forico supports the principle that individual landowners have the right to manage a sustained population on their property for that purpose.

Wildlife management control forms a critical component of Forico's decision making process that determines both the quality, sustainability and viability of the FMU. Controlling and management of mammal browsing pressures is not restricted to one landowner, community group, or individual. Fallow deer migrate across all land tenures throughout the landscape and can have a devastating impact on crop success, whether that be a plantation or agriculture commercial enterprise. Responsibility requires proactive involvement from all landowners and regulators. Legislation must clearly align with the expectations and needs of society.

#### **Current Impact and Operational Constraints**

Forico spent in excess of **\$450,000** during the 2015 - 2016 financial year controlling browsing animal populations in plantation and natural forest establishment and remediation activities. As a direct impact of fallow deer, Forico spent **\$135,000** on re-establishing three entire properties in Blessington alone (**165 hectares**) during 2015 – 2016. The lost production as a consequence of this replanting activity will amount to an addition loss of approximately **\$80,000 in income** (i.e. one years lost growth).

It is anticipated that these operational costs will increase due to the expanded establishment program that Forico is planning:

- 2014 - 2015 = 3,600 hectares.
- 2015 - 2016 = 6,000 hectares.
- 2016 - 2017 = 8,000 hectares.

Whilst this cost is significant it does not accurately reflect and account for the broader production losses due to unproductive or failed areas and variable / compromised crop performance that could become impacted later in the rotation. While a proportion of this loss is associated with wallabies and possums, it is clear that introduced fallow deer represent serious impediments to plantation forestry success because:

1. The current regulations protect and sustain an increasing population of fallow deer for the benefit of recreational hunting at the expense of all other productive land users and commercial enterprises;
2. The current requirements that do allow the culling of fallow deer are reactive, as the landowner is required to experience and demonstrate significant crop damage prior to the

approval to destroy only a limited number of deer to sustain the population. This is a perverse outcome;

3. The current regulations in effect force private landowners to provide food and shelter for fallow deer without the flexibility to manage them according to appropriate and acceptable land management objectives; and
4. The current regulations impose a significant administrative burden on large landowners through managing land access permits, deer tags, poaching, and micro-political issues.

### **Opportunities**

Under this legislative inquiry there are several possible pathways to assist in minimising the impacts of fallow deer on crop management in Tasmania:

1. Complete deregulation of all legislation associated with fallow deer in Tasmania. This would provide individual landowners with the flexibility to manage a sustained population for recreational hunting or the flexibility to minimise crop damage through unrestrained culling,
2. The removal of barriers that restrict the free marketing of wild deer meat products in Tasmania. This may reduce some of the culling costs associated with crop protection from fallow deer and other species,
3. The delegation of fallow deer management from state legislation to individual (property) Wildlife Management Plans. These plans, co signed by DPIPWE could micro manage fallow deer on individual properties,
4. Administer free and unrestricted access to crop protection cull permits for fallow deer. Whilst this option continues to impose costs on land managers the issue system would need to work proactively before crop damage was sustained.

### **Recommendations**

Forico recognises that a sustained population of fallow deer is important to some members of the Tasmanian community. However, this need can be adequately serviced from individual properties rather than through state wide restrictive legislation and regulation that will impose significant administration and cost to all landowners.

Forico propose that DPIPWE remove the requirement for property owners to apply for permits to control fallow deer during the appropriate season. The development and approval of Wildlife Management Plans between the landowner and DPIPWE will enable proactive engagement with all relevant parties and ensure sustainable outcomes are achieved (accounting for economic, environmental and social criteria).

### **Conclusion**

The current legislative inquiry presents a unique and timely opportunity to revisit fallow deer management in Tasmania through an engagement process that involves all interested and affected stakeholders. As an introduced species, fallow deer represent huge land management costs in all forestry and cropping / agricultural settings. As a species, fallow deer holds no endemic fauna values to Tasmania. The consequence of the uncontrolled population of fallow deer has a devastating impact at both an environmental and commercial level.

As an integral part of this review, Forico recommend DPIPWE continue to actively engage with a wide audience, incorporating all interested and affected stakeholders in Tasmania to ensure that the resulting regulations are widely accepted by Tasmanian landowners, hunters and external stakeholders. To attain this unified support will enable the legislation to be enacted.

Forico remains committed to supporting and engaging in such dialogue with the entire agricultural community and appreciates the opportunity to participate proactively in this legislative inquiry.

For further information and comment on this submission please contact:

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## Allison Waddington

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**From:** Simon Cook <simon.cook@forico.com.au>  
**Sent:** Friday, 24 June 2016 1:50 PM  
**To:** DEER  
**Subject:** Legislative Council  
**Attachments:** Legislative Council Inquiry\_Fallow Deer\_Forico Pty Limited.pdf; Legislative Council Inquiry\_Fallow Deer\_Forico Pty Limited\_Cover Letter.pdf

Please find attached a submission from Forico Pty Limited with respect to the Legislative Inquiry Into Wild Fallow Deer Population in Tasmania.

Please contact me if you have any queries.

Regards

Simon

**Simon Cook**  
Certification and Compliance Manager

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