"Together, create and apply solutions"

Invasive Animals Cooperative Research Centre

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The Secretary
Legislative Council Inquiry into the Wild Deer Population in Tasmania
Parliament of Tasmania
Parliament House HOBART TAS 7000
Via email: deer@parliament.tas.gov.au

28 June 2016

Dear Inquiry Secretary

Submission to the Inquiry into the Wild Deer Population in Tasmania

The Invasive Animals Cooperative Research Centre (IACRC) welcomes the opportunity to provide a submission to this inquiry.

The IA CRC is Australia's largest collaborative pest animal research, development and extension initiative comprising 27 government, industry, business and research partners. Its purpose is to counteract the impact of invasive animals through the application of new technologies and by integrating approaches across agencies and jurisdictions.

Key points:

- Fallow deer are well established in Tasmania and the population is increasing in number and distribution. The UTAS modelling (Potts et al) presents the best assessment of the population available although it has some weaknesses due to limited data inputs.
- There is a deficiency in the current monitoring and surveillance effort of the population and for the understanding of the scale of the negative impacts the population.
- The management strategy is focused on protecting the resource to sustain, and improve, the population as a game species, and a review is warranted to enable a more balanced management approach that aims to better reduce negative impacts to agriculture and the environment.
- Environmental and economic impact management is referenced in the management strategy as an objective but it is a secondary objective and imposes a variety of regulatory restrictions on hunters and land owners through the incongruous 'partly protected' status. The negative impacts are not given due weight in the regulatory framework.
- Other jurisdictions are grappling with the growing overabundant deer population problem. For example the NSW Natural Resources Commission pest animal review recommends that deer management be changed to exclude all species of deer from the *NSW Game and Feral Animal Control Act 2002*, and instead include all species of feral deer in a regulation addressing pest animals under the *NSW Biosecurity Act 2015*. This proposed regulatory change is consistent with Western Australia, Queensland and South Australia, which already declare deer as a pest species.

Yours faithfully

Andreas Glanznig
Chief Executive

Introduction

- Noting the Terms of Reference of the Inquiry, this submission focuses on the current management regime with regard to the legislative status of fallow deer in Tasmania and the effectiveness of this regulatory approach as it relates to best practice management principles. While some comment is made on fallow deer and their environmental and economic impacts, the IACRC expects that the negative impacts of the species is well documented in a variety of reports and self-evident and that these will be conveyed to, or independently discovered by, the Inquiry. As a result, this submission does not go into detail of these issues.
- The IACRC posits that the fundamental issue with regard to effective management of fallow deer in Tasmania is the designation of the species as 'partly protected' under the *Wildlife (General) Regulations 2010* and the restrictions this places on land managers to manage the negative impacts of the presence of fallow deer on their properties.
- Having stated that, the IACRC appreciates the diversity of views in this area and has a long history of working towards achieving best practice in areas involving management of agricultural and environmental pests as evidenced by the research and forums the IACRC has led and is referenced at the end of this submission. We commend the Legislative Council for examining this issue and look forward to the Inquiries deliberations and findings in a complex issue of competing economic, environmental and social interests.

Fallow Deer and their Risks and Impacts

- There are six species of deer present in Australia. All are introduced species with the natural distribution broadly defined as in the northern hemisphere from the Arctic Circle down through Europe and northern Asia with individual species having select areas based on habitat and climatic conditions. Fallow deer (*Dama dama*) occur naturally in the wider Mediterranean region and parts of the Middle East. Fallow deer are known to have occupied both islands in New Zealand and significant parts of NSW, Queensland, Victoria and South Australia as well as Tasmania.
- Fallow deer were subject to a risk assessment (Massam, Kirkpatrick and Page, 2010 and Page, Kirkpatrick and Massam, 2008) which determined their 'threat category' to be 'extreme', the highest threat category, due to the establishment risks, risks to public safety and risks of causing negative impacts. A copy of the risk assessment is available at http://www.pestsmart.org.au/wp-content/uploads/2010/10/Dama_dama_VPCendorsed_270410.pdf and provides a succinct description of the risks and impacts relating to fallow deer. With an 'extreme' threat category, the relevant government guidelines state,

"These animals should not be allowed to enter, nor be kept in any State or Territory unless sufficient risk management measures exist to reduce the potential risks to an acceptable level. This level needs to be in line with the principles outlined in the IPAC Guidelines. These measures should also be agreed to by all relevant authorities who oversee the responsibility for the on-going management of the species." (IPAC, 2015)

- Fallow deer are widely regarded as an invasive or pest animal in most parts of the world outside of their 'natural' distribution. Their presence presents a management problem for farming and conservation interests as well as a safety issue.
- Fallow deer are well-recognised for the damage they can cause to agricultural crops and native plants through browsing, ring-barking and trampling of crops and damage

to fencing (Massam, Kirkpatrick and Page, 2010 and Page, Kirkpatrick and Massam, 2008)

- It is sometimes less well-recognised the risk fallow deer present to agriculture as a 'reservoir' and vector for some animal diseases which can have impacts on livestock. Preparedness planning for major emergency animal diseases identified that fallow deer are susceptible to 11 of the 27 major animal diseases (Animal Health Australia, 2011) with the issue that their susceptibility, and potential transmission to and from the species, would complicate management of those diseases. These diseases include Foot and Mouth Disease, Transmissible spongiform encephalopathies (TSE and specifically Chronic Wasting Disease for deer), Anthrax, Johnes Disease and Bluetongue (Animal Health Australia, 2014 and 2011). The key risk factors in relation to deer acting as a disease vector include that the species generally form in groups, can travel long distances and have cryptic behaviours, can be difficult to control and inhabit remote and inaccessible terrain and have virtually no natural predators other than humans.
- Deer also present an additional vector for the dispersal of weed seed and further spread of weeds (Davis, Forsyth and Coulson, 2010) and can cause streambank and other erosion.
- Whilst generally cryptic in nature with a tendency to avoid human contact, their presence presents a road safety issue with risks of collision with motor vehicles and subsequent human injury or death as well as economic loss for motorists (Hothorn, Brandl and Muller, 2012)

Best practice invasive and pest animal management

- While noting that fallow deer are not currently regarded as an invasive or pest animal in Tasmania, best practice in the management of invasive and pest animals should be considered in assessing the current and future management strategies for this species.
- The notion of best practice in this field can be reduced to a series of seven principles (adapted from Braysher, 1993):
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1. *A pest is human construct* -
    - the term 'pest animal' is generally used to describe an animal that conflicts with human interests as it may be destructive, noisy, smelly or simply not wanted. Generally, a pest animal is one that causes more damage than benefits to human-valued resources and social well-being. This assessment will be based on an individual's personal beliefs, interests and experiences whilst quantification of many of the benefits and impacts should be relied upon.
    - The term 'invasive animal' is often substituted for the pest animal term in recognition that an animal may be out of its natural distribution due to natural range expansion over time or from human-induced translocation.
    - It is important to recognise that divergent views on the status of fallow deer should not be unexpected. A management strategy should have regard to the polarised views in an effort to manage those competing interests
2. *All key stakeholders need to be actively engaged and consulted in management* -
    - given the diversity of opinions and interests that may exist in pest animal management, and the difficulties in actually undertaking control or eradication, all key stakeholderd must be engaged in management decision-making.
    - The IACRC is leading research into this area through the 'Community Led Action' research theme that identifies that 'top-down' decision-

making or limited consultation and input from stakeholders is counter-productive and limits the effectiveness of any actions. Ownership, and an appropriate degree of control, by those affected has been identified as a significant factor in the success of pest animal management and this should be extended to deer management with regard to the hunting, agricultural, biosecurity and conservation interests in determining the appropriate management strategy

3. *Rarely can pests be eradicated* -
    - The term 'eradication' is often touted as a desired outcome in pest animal management. The term means the complete removal of all individuals and is an incredibly difficult objective to achieve.
    - Whilst Tasmania has an enviable record in achieving eradication, the experiences of the Fox Eradication Program, in terms of sustained criticism and misinformation from some sectors, and the Macquarie Island Pest Eradication Project, in terms of criticisms and logistics and costs issues, presents two very good examples of the difficulties of attempting eradication.
    - Six criteria are identified in the seminal work (Bomford and O'Brien, 1995) in this area and, as eradication is not being considered within the scope of this Inquiry, this submission will not go into this area further other than to indicate that eradication of fallow deer from mainland Tasmania is not likely to be technically feasible without the allocation of significant resources over an extended period at a scale that is most likely beyond the capacity of the Tasmanian Government.
4. *Most pest management needs to focus on the outcome, reduction in damage, not just killing pests* -
    - damage caused by pest animals can be social, economic, environmental or a combination of these. When attempting control, as opposed to eradication, the focus should be on defining and managing the damage caused by the target species to an 'acceptable' level, as opposed to focusing on some target number of animals destroyed, in order to achieve a 'return on investment' from the control efforts. Land managers and owners need to identify where and how to allocate their limited resources for the best effect.
    - This is relatively self-evident in relation to fallow deer in Tasmania and the reports of increasing impacts drawing concern from agricultural and conservation sectors alike
5. *A whole-system approach is required for managing pest damage* -
    - Pest animals are one component of effective land management and a systems approach - that considers climatic and seasonal factors, resources and skills, land use, commodity prices - should be adopted. This ensures the necessity for control, and the desired outcomes, is carefully considered within the broader landscape or agricultural systems where the species exists
6. *Most pest management occurs in ecosystems in which our knowledge is imperfect* -
    - Despite the desire to operate with a 'whole-system' approach, it must be acknowledged that it is extremely rare to have complete or perfect knowledge about the target species, its behaviour and biology and relationships with other parts of the system. Pest animals exist within a complex and dynamic system and we need to take a risk approach to pest animal management. This includes making decisions about how to best manage the species and monitoring changes within the system to ensure the decision remains valid

7. *An effective monitoring and evaluation strategy is essential for all management interventions* -
    - Given pest animal management will occur with incomplete or imperfect knowledge, it is critical to maintain effective monitoring and surveillance systems to assess if the management actions are making a positive contribution to the desired outcome. This is essentially a standard monitoring and evaluation approach whereby monitoring identifies the outcomes and feed back into the decision making process to review and, if necessary, re-align or refine the management activities.

- There is a high level of awareness of the importance of deploying humane practices in the management of invasive and pest animals and this aspect is included as an essential component of best practice. The need to consider the ethical issues and importance of achieving and maintaining community support is well recognised by the profession and aims to ensure that the targeted animals are not subjected to inhumane techniques and experience undue suffering or pain.
- The IACRC is aware that the Invasive Species Branch within Biosecurity Tasmania has adopted what is considered to be international best practice in the use of the Generalised Invasion Curve (GIC) as a basis for decision making for species management and, whilst Biosecurity Tasmania does not have statutory responsibility for deer management, this approach is relevant to this issue. The GIC considers the 'scale' of an invasive population, ie the numbers or distribution of the population, and identifies whether eradication, containment or ongoing management to protect assets is the most appropriate target. As an established species, and with current control options, the obvious management objective is 'ongoing management' with the aim of controlling the deer population to minimise the negative impacts on key assets. This is often referred to as 'Asset based protection' whereby efforts are focused on protecting an asset (e.g. an agricultural crop, fragile riverbank or a threatened ecological community) from the impacts through appropriate control efforts such as exclusion fencing or destruction (e.g. shooting, baiting). A future management strategy for fallow deer should place a greater emphasis on identifying the assets requiring protection and align the strategy to enable the better protection of those assets.
- The IACRC has worked with a number of government and university partners in identifying new control techniques, including a range of toxins (e.g. PAPP for wild dog and fox control) and biocontrol agents (e.g. a carp herpesvirus for European carp and RHDV K5 for European rabbits), and monitoring methods to improve invasive species management techniques. Australia has an enviable international reputation for leading the development and implementation of best practice in this area.

Current Deer Population in Tasmania

- Fallow deer are believed to have been introduced into Tasmania in the 1830's for the purposes of hunting (Bentley, 1978). Since then, it appears that the population has continued to increase in density and expand its distribution.
- The size of the current population is not clear, with 20,000 to 30,000 cited as the current population size (Potts et al (in press) DPIPWE, 2015, DPIPWE, 2011). Evidence indicates that the population is increasing with a possible 300% increase since the 1970's and a 500% increase in distribution predicted within Tasmania by the middle of this century (Potts et al (in press)). These figures are provided with caveats due to limitations in the current surveillance data. This lack of certainty presents a serious deficiency in the current management regime and affects the ability to manage the population, either as a game resource or as an invasive or pest species.
- The distribution of the deer population also appears to be increasing. The current management regime (DPIPWE, 2011) refers to a 'home range' and 'satellite herds' however empirical and anecdotal evidence indicates that the population densities

have increased and, in effect, connected in many areas and will continue to expand (Potts et al (in press)) leading to the expectation of more widespread and higher intensity impacts.

- With the apparent absence of recent population data to quantify the size, distribution and characteristics there is a reliance on anecdotal evidence. This is indicating that the deer population is increasing, and continues to increase, in numbers and distribution within Tasmania with deer sighted in areas where the species were previously absent. Similarly, reports of native vegetation and crop damage are being noted in those new areas. The evidence presented by UTAS (Potts et al) indicates that the current rate of removal (destruction) of fallow deer is not keeping pace with the population growth. A range of factors may be causing this including that the:
    - Level of community interest in deer hunting is not sufficient to maintain control of the population size, ie the rate of removal or capacity for removal is less than the natural deer population growth,
    - Hunting community is only targeting a specific cohort (e.g. Trophy bucks), due to their personal interests or the current regulatory regime, and this is enabling younger age cohorts to reach sexual maturity and subsequently reproduce,
    - Access to private and public land where the deer population needs to be targeted to address impacts and protect key assets is restricted, or
    - The current management regime does not permit sufficient numbers of deer to be destroyed
- A population, derived from an escaped 'farmed deer' population, is also present on King Island and demonstrates the risks from permitting the farming of an invasive animal without adequate safeguards. Anecdotal evidence suggests that some of the mainland Tasmania deer populations are similarly sourced from escaped farmed deer populations.

Current Management Strategy

- Currently, despite being an introduced animal with known negative impacts on crops and the natural environment and an apparently abundant wild population, fallow deer are regarded as 'partly protected' in Tasmania under the *Nature Conservation Act 2002* and *Wildlife (General) Regulations 2010*. This means that landowners, land managers are persons acting on their behalf are restricted from destroying deer unless authorised under a regulatory system administered by DPIPWE.
- Deer management is designated the legislative responsibility of DPIPWE and, specifically, the Wildlife Management Branch of the Natural and Cultural Heritage Division (formerly the Resource Management and Conservation Division). This presents a conundrum in that the area responsible for managing biodiversity and threatened species, amongst other areas, is also managing an introduced species that causes significant environmental and economic damage. It is understood that this is a relic of a long standing organisational structure but the conflict in values is an issue worth considering by the Inquiry. The IACRC is not in a position to assess the appropriateness of this arrangement but suggests that there is the need for agricultural and environmental factors to be better incorporated into the management strategy.
- The current management strategy (DPIPWE, 2011) indicates that the aim is to balance hunting interests with the need to protect agriculture and the natural environment. Key to this is a regulatory permit system governing the take of fallow deer. Feedback from Tasmanian land managers and conservation groups indicates that the interests of land owners and managers to manage those impacts of fallow deer may not be being adequately met due to a focus on meeting the hunting interests. Whilst a 'property-based' approach and 'crop protection permits' are options under the current management strategy (DPIPWE, 2011), the relevant Regulations regulate the hunting activity and restrict the numbers and sex of deer to be controlled. This approach presents additional barriers to land owners and managers wishing to

control the impacts of fallow deer. The management regime specifically identifies 'Quality Deer Management' as a key objective (DPIPWE, u/d and DPIPWE, 2011). It is evident that the deer population is being managed primarily as a 'game' resource with a view of maintaining the population for the purposes of providing 'game meat' or 'trophies' for hunters. It appears that the need for land owners and managers to be able to manage the impacts of the species and prevent economic, biodiversity and land condition losses is a secondary consideration.

- The current management strategy relies on private interests, i.e the hunting community and landowners, to destroy deer. It is understood that deer hunting is an important recreational pursuit within parts of the Tasmanian community and that hunters value their contribution to managing the deer population and the game meat and 'trophies' as a result. It is recognised that a number of hunting groups and landowners have longstanding arrangements, that in some cases span generations, that enable hunters to access to private land to hunt deer whilst also targeting other invasive species. Some landowners derive a not insignificant financial benefit from this in some cases and its presents an important contribution to the economic viability of their farming enterprises. This includes direct benefits in payments from hunting groups as well as indirect benefits from invasive and pest animal control at little or no cost. This 'social' or cultural contribution of the current arrangements needs to be recognised as it is also an important element to devising a successful future management strategy.
- There does not appear to be a systematic monitoring and surveillance effort for Fallow deer in Tasmania. Data collected appears to be heavily reliant on 'harvest' data as opposed to assessing the larger population numbers, distribution and dynamics. If more detailed data is collected, it does not appear to be publicly available nor reported and limits the ability of land owners and managers to identify emerging or increasing threats and pressures from the deer population. If there is more detailed data, this should be made more readily available in the interests of transparency and to enable land managers to have a better understanding of the population dynamics.
- There has been a growing interest in conservation hunting within Australia over the past decade and it does present some opportunities through an increased resource base to undertake control of pest and invasive species. A reliance on conservation hunting to manage an invasive or pest animal population should however be treated with caution. Whilst there have been some examples of this approach being effective, e.g. Operation Bounceback in the Flinders Ranges in South Australia, it is usually at a very localised scale and part of a coordinated program rather than ad hoc efforts. Ad hoc invasive and pest animal control can often result in 'naive' (i.e. easy to detect) individuals being targeted and the population becoming increasingly wary and difficult to control. This may result in the population moving into more remote and difficult terrain and becoming more cryptic to further complicate future management efforts. Whilst conservation hunters frequently undertake this role on a voluntary basis, and often for the purpose of achieving a positive outcome for land managers and the natural environment, it should be noted that a motivating factor for many deer hunters is the desire for 'trophies' and as such the likelihood that specific mature individuals may be targeted within the deer population. This can be expected to mean that the targeted individuals have reached and passed sexual maturity and contributed to the next generation in the population. An analysis of some of the issues surrounding hunting efficiency and effectiveness is contained in Krull et al (2016) but it is noted that the assessment outcome of other situations will vary.
- Media reports of interest in importing new genetic stock to the deer population in Tasmania recently were noted. Given the current issues with the population, the desire to improve the genetic rigour of the current population should be resisted until the current impacts are better managed.

Deer management in other jurisdictions

- Other jurisdictions are grappling with the growing overabundant deer population problem. For example the NSW Natural Resources Commission pest animal review recommends that deer management be changed to exclude all species of deer from the *NSW Game and Feral Animal Control Act 2002*, and instead include all species of feral deer in a regulation addressing pest animals under the *NSW Biosecurity Act 2015*. This proposed regulatory change is consistent with Western Australia, Queensland and South Australia which already declare deer as a pest species (NSW NRC 2016).

Future management

- Modelling of the Tasmanian fallow deer population (Potts et al (in press)) presents an emerging problem under the current management regime that is expected to grow in scale, and most likely worsen, under the current approach. The University of Tasmania, as the instituion responsible for this modelling, should be congratulated for their work in this area as it presents a strong evidentiary approach from which a defensible policy decision can be made. Noting the conjecture in relation to the current population size and weakness in current surveillance, the UTAS modelling indicates that the current management regime could be expected to result in a 40% growth in the population in favourable conditions with the possibility of Tasmania reaching a maximum carrying capacity of 1,000,000 deer by mid-century (Potts et al (in press)). This modelling and assessment indicates that alternative management strategies must be considered.
- A stronger surveillance system to monitor the size and distribution of the deer population should be introduced. It is noted that there has been monitoring and surveillance efforts at greater detail noted in the current 'Statement of Current Management Practices' (DPIPWE, 2011) but it is not clear that efforts at a similar level are continuing. A 'passive' surveillance system whereby members of the public can easily report deer presence and numbers can be promoted and the IACRC can assist the Tasmanian Government through the availability of the 'DeerScan' reporting system (IACRC, 2016) that enables a member of the public, or government officer, to report a deer sighting through DeerScan smartphone app or via a standard website. This passive surveillance, when combined with targeted systematic surveillance, can provide an improved dataset of the current population and changes over time and ultimately lead to improved decision making in relation to that population.
- Fallow deer should be regarded as established in Tasmania. As such, the options for future management are limited. Whilst there may be some opportunities to undertake specific eradication activities, e.g. on King Island, the focus should be on managing the negative impacts of deer whilst, where possible, catering to the interests of the hunting sector under an asset based protection strategy. This duality of purpose can be achieved and is stated in the current management strategy although, as noted above, these dual purposes do not appear to gain an equal weighting and agricultural and conservation interests lose to those of the hunting sector.
- The legislative status of fallow deer should be reconsidered. The current management regime includes fallow deer under the *Nature Conservation Act* and subordinate legislation as a 'partly protected' species with restrictions on their control. An alternative statute is not readily identified. The Tasmanian *Vermin Control Act* is recognised as a relatively weak statute and the IACRC understands that work is underway to develop a single 'Biosecurity Act' in Tasmania that provides a stronger and more contemporary framework to manage invasive species and animal disease issues, amongst other biosecurity issues, in a single Act. As such, it is difficult to identify if the current approach of using native wildlife legislation is the most effective approach or if the expected Biosecurity Act will provide a better fit to manage this issue. The negative impacts posed by fallow deer indicate that there is a strong

environmental and livestock biosecurity element to the issue and it should be questioned as to the appropriateness to continue to treat fallow deer as wildlife.

- The interests of the hunting community should be acknowledged in the management regime but not at the expense of the rights of land owners and managers attempting to protect their farming enterprises and environmental assets. The expected tendency of hunters seeking 'trophy' deer, and alignment of the management strategy to this purpose, does not present a viable population control measure and should not be expected to contribute significantly to managing the negative impacts of the deer population nor the expected increases in population size over time. Whilst the conservation hunting approach could present a solution in part to this issue, it must be coordinated and managed effectively to ensure the effort targets the population in a manner that contributes to either minimising the negative impacts of deer (i.e. Asset based protection) or reduces the reproductive potential of the population (e.g. targeting a specific age cohort within the population).

Recommendations

The IACRC recommends that the:

- Objectives of the current management strategy, and in particular 'Quality Deer Management' and 'Property-based Game Management' be reviewed to determine if:
    - the negative impacts of fallow deer are being adequately considered in management decision making,
    - the agricultural and conservation sector are being adequately consulted in management decision making to ensure all interests and issues are being considered adequately, and
    - A move to asset based protection provides the opportunity for better outcomes for the wider community
- Population modelling, as developed by UTAS, be accepted as a fundamental base for decision making to determine an appropriate management regime for fallow deer in Tasmania
- Perceived weaknesses in the current population surveillance effort are noted and options to improve that effort, and subsequent inputs into the UTAS modelling and management decision making, are considered and implemented as a priority. Decisions on the management regime should not be delayed however whilst this is achieved as anecdotal and empirical evidence is indicating a worsening problem for Tasmania with regard to managing the impacts of the fallow deer population
- Need to better manage the negative impacts of deer on agriculture and the natural environment is acknowledged and given a higher priority in determining the appropriate management strategy
- Conservation status, and appropriateness of managing, fallow deer as a game resource under the *Nature Conservation Act* and the *Wildlife Regulations*, as opposed to within a biosecurity framework, be considered further with a view of enabling land owners and managers to better manage the impacts of fallow deer
- Regulatory approach restricting land owner and manager control efforts be re-assessed and the management strategy be realigned to permit simpler asset based protection
- Interests of the hunting sector are acknowledged and, if considered necessary to maintain a stock of 'trophy deer', that either:
    - a geographic 'home range' is identified within Tasmania whereby deer located within that area maintain the 'partly protected' status and land owners and managers outside of this home range are given the rights to prevent damage from deer through localised and coordinated control efforts, or
    - The partly protected status of deer is completely removed but property owners, who wish to maintain a stock of trophy or game meat deer to derive an income from hunting interests or game meat supply, are permitted to

contain deer to their property and be required to manage that population within their property and prevent its spread, and subsequent impacts, to adjoining properties. Under this approach, it may be feasible for a group of land owners to manage a population across multiple properties if that was a mutual interest. It must be noted that if this approach is adopted, it is critical that land owners wishing to maintain a deer herd on a property are required to contain that herd to within their property boundaries to prevent impacts on adjoining neighbours

- Reliance on ad hoc hunting activities will not adequately address the negative imacts of deer and a more effective and coordinated approach is needed. This would involve coordination between land owners and managers at a scale greater than the individual property level, i.e. regional level.

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Allison Waddington

From: Andreas Glanznig <Andreas.Glanznig@invasiveanimals.com>
Sent: Tuesday, 28 June 2016 6:04 PM
To: DEER
Subject: IA CRC submission to Tas deer inquiry
Attachments: IA CRC Tas deer submission 28062016.pdf

Dear Jenny

Attached pls find the submission of the Invasive Animals CRC to the Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania. Pls direct any enquiries to me.

Yours sincerely
Andreas Glanznig

Andreas Glanznig | Chief Executive

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