

SUBMISSION TO THE LEGISLATIVE COULCIL INQUIRY INTO THE WILD FALLOW DEER POPULATION IN TASMANIA

To whom it may concern

Executive Summary

My submission is to deregulate Fallow Deer *Dama dama* to the status of Brown Hare *Lepus lepus* allowing landowners/managers to manage deer numbers on their land in accordance with their preferences but with due respect to animal welfare and firearms legislation.

Background and Submission

I offer comment from the point of view of a wildlife biologist who has worked widely across Tasmania for 40 years, mostly employed by DPIPW or its name equivalent, including a 5 month stint in 2009 as acting manager of the department's Game Management Unit.

By DPIPW's own records wild Fallow Deer are increasing in numbers and distribution (Table 1.) and damage they cause and disease risks they present increasing along with those changes. DPIPW's records that I am using are based on annual spotlight transects, a very valid way of gaining abundance indices and place records for a variety of mammals, deer included.

Data I use here are post 1985, a year in which numbers of transects changed, which means there are the same number of transects each year in my comparison so there are no significant variation issues on sample size/location.

Table 1: Transect clusters where fallow deer have been recorded during the spotlight surveys. Results are shown in (approximately) decade time spans to highlight the change in distribution of fallow deer, as recorded by the statewide spotlight surveys 1975-2015. Grey highlight indicates a transect group where deer had not previously been recorded during spotlight surveys.

1975-1984		1985-1991		1992-2001		2002-2011		2012-2015	
Transect area	Year First recorded	Transect area	Year First recorded in this period	Transect area	Year First recorded in this period	Transect area	Year First recorded in this period	Transect area	Year First recorded in this period
Deddington	1975	Deddington	1986	Deddington	1992	Deddington	2002	Deddington	2012
Epping	1976	Epping	1986	Epping	1992	Epping	2002	Epping	2012
Lake Leake	1976	Lake Leake	1987	Lake Sorell	1992	Lake Sorell	2002	Lake Sorell	2012
Lake Sorell	1975	Lake Sorell	1985	Lake Leake	1993	Lake Leake	2003	Lake Leake	2012

Lemont	1975	Lemont	1987	Lemont	1992	Lemont	2002	Lemont	2012
		Waddam ana	1988	Waddam ana	1992	Waddam ana	2002	Waddam ana	2012
				Beaconsf ield	1993	Beaconsf ield	2002	Beaconsf ield	2012
				Lake Echo	1997	Lake Echo	2002	Lake Echo	2014
				Delorain e	1997	Buckland	2004	Buckland	2012
						Fingal	2002	Fingal	2014
						Judbury	2005	Judbury	2012
						Kempton	2005	Kempton	2013
						Pipers River	2004		
						Swansea	2008		

Note the increasing rate of 'new' areas in each time period above. New records (on transects) can represent and new occurrence (expanding distribution) and/or increasing abundance (to the point they are seen in surveys). A simple look at the numbers of standard transects per year recording deer also demonstrates these changes (Fig 1).

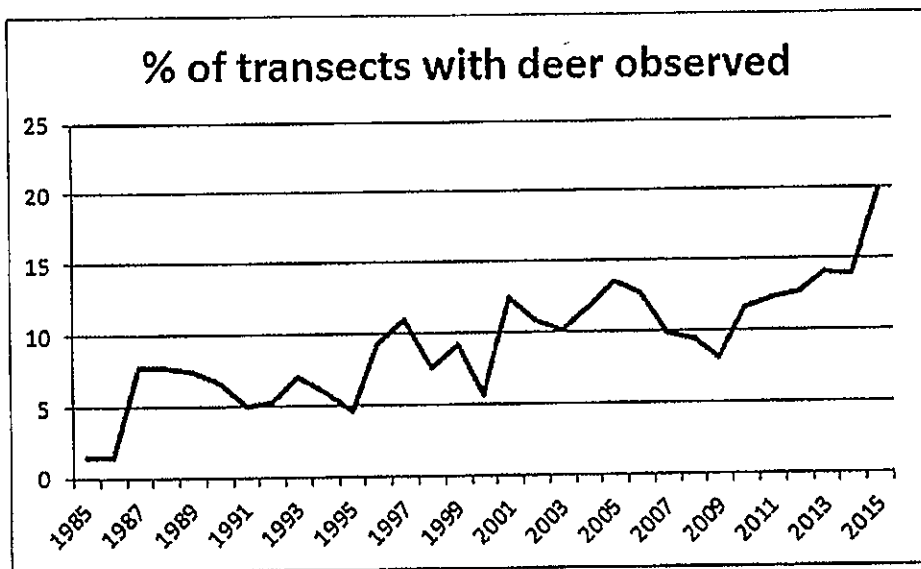


Figure 1. Proportion of transects recording deer over time.

Range expansion is obvious with deer being recorded in the wild near Nelson Bay and Temma for some years (eg Fig 2).

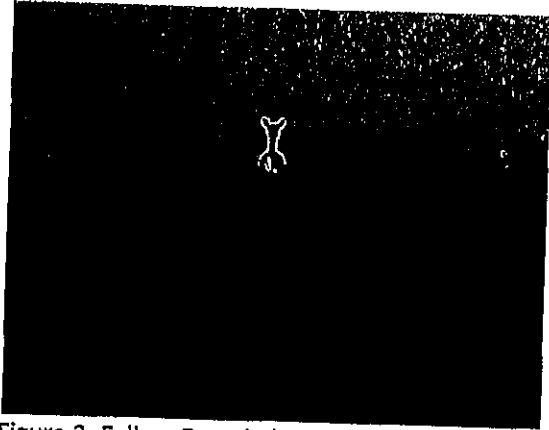


Figure 2. Fallow Deer in buttongrass near Temma 2013.

Locals were refused permission to rid the area of this feral species, compliments of its legal status. Deer are also now feral on Bruny Is as a consequence of escape from a barge taking them to Satellite Island. Again locals were refused permission to eliminate them because they are protected. Deer are common now at Southport and in Freycinet National Park, well across the central plateau, at Marion Bay and now are near Richmond and at Orielson. The concept of a core area is now a nonsense.

Equally obvious as arrange change is an increase in abundance. is the increase in numbers per transect (Fig 2). Occasional large year to year variation (blips in the graph) can be because of real abundance changes increases and/or artifacts on surveys such as vegetation length and density. However, the trend is clear, abundance is increases at an increasing rate and current management is inadequate to contain either their numbers or wild distribution.

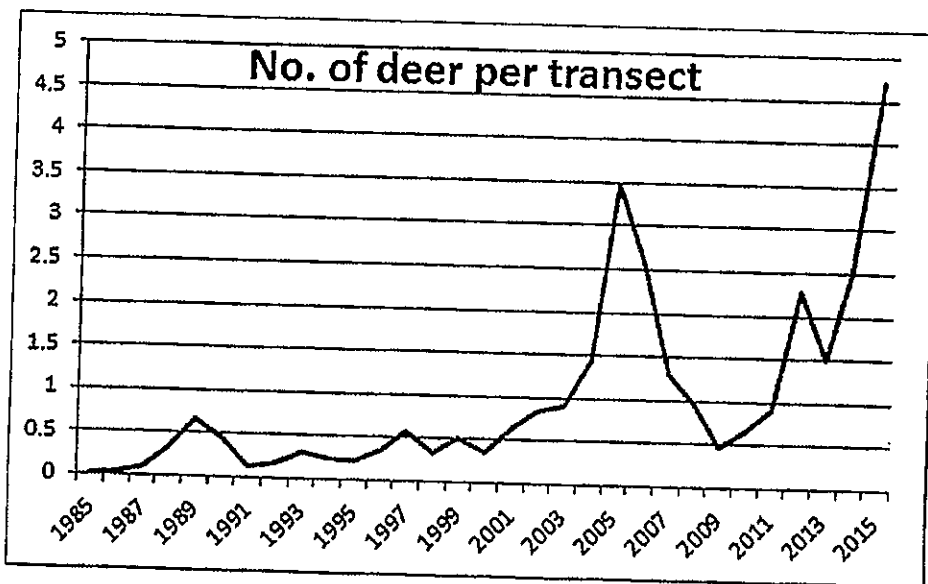


Figure 2. Numbers of deer per transect.

Considering the very high profile deer have had for many decades it seems truly bizarre that DPIPW or its predecessors have no reliable estimate of population size not damage the species does. Indeed, it seems to me that those in DPIPW managing deer have very much deliberately avoided such using instead very conservative underestimates of both numbers and damage to 'protect' deer.

Benefits of Deregulation

Deregulation to the status of hare would achieve many positive outcomes; it would

1. *Remove tension many landowners/managers have with restrictions they suffer on numbers and demographics (age/sex) of deer culled*
2. *Remove tension many landowners/managers have with being obliged to have hunters on their land (this is odious to many landowners/managers I have spoken to)*
3. *Save public funds by removing obligations/excuses wildlife officers and police feel they have to patrol for deer poaching.* During my 32 years as a wildlife officer in DPIPWE or its equivalent, the overwhelming priority protecting deer had amongst game management and policing (compliance) staff was an open joke but it compromised serious nature conservation. In effect, time and money spent protecting deer (an unnatural value in the context of Tasmania) came from protecting natural values. Such staff were so mobilised around deer season opening dates that there was no hope of assistance for any other issue such as reports of Tasmanian devils or Wedge-tailed Eagles being deliberately and illegally poisoned (an actual example). Deer trumped all.
4. *Remove the requests from landowners/managers for wildlife officers and police to attend instances of deer poaching and trespass (since those landowners not wanting deer can drastically reduce their numbers and their properties attractiveness to trespassing hunters)*
5. *Enable the rapid response of landowners/managers and their agents to incursions/sudden appearances of this feral species (eg Southport, Temma, Bruny)*
6. *Enable the reduction of range of this feral species*
7. *More easily enable the commercial harvesting of wild deer.*
8. *Save public funds by removing the need for inspections by public servants of damage claimed to deer.* For 6 months during 2009 I was the acting manager of DPIPWE's Game Management Unit. During that time I made efforts to measure what effort went into managing (essentially protecting) deer and witnessed bizarre efforts go into protecting feral deer (ie preventing or severely restricting landowners/managers culling) while little or no effort went into conserving wallabies of the same status permits for unlimited numbers of the latter to be culled being issued commonly and glibly with little or no challenge. On one occasion a Game Management Officer drove on their own initiative, from Hobart to the Ben Lomand foothills and back (at a cost of about \$600.00 considering wages, allowances and vehicle costs) simply to inspect claimed damage of deer to a crop as a basis of a request to cull several deer. Such effort would not be even considered for a request to cull thousands of wallaby.
9. *Enable the hypocrisy born of the 'Bambie Syndrome', much played by some hunters and some public servant managers, to be discarded.* For some time there have been restrictions on culling antlerless deer to supposedly protect heavily pregnant does and dependent fawns although no equivalent restriction applies to any other mammals equally sentient as deer (notably Bennetts wallaby and Tasmanian pademelon) hunted in vastly more numbers by a wider variety of methods

including flushing with dogs (which inevitably leads to coursing, itself illegal under the Animal Welfare Act 1993).

Although obligations (drafted by the RSPCA) exist for humanely destroying pouch young of shot wallaby some such young are stashed by panicking wallabies and are never found and humanely destroyed. Equally, newly emerged pouch young (ie those close at foot) are behaviourally dependent and partly nutritionally dependent on their mothers and no concessions are made to their welfare in wallaby hunting. The same lack of concession to welfare applies to Eastern Grey (aka Forester) Kangaroo, Brushtail Possum, Common Wombat, Tasmanian Native-hen, various waterfowl and gulls during culling under crop protection permits. This hypocrisy has to be addressed and the way to do it would be either through deregulation of that restriction on deer culling or narrowing crop protection to avoid breeding of those other species.

Costs of Deregulation

- About 4,800 licences for hunting deer are now sold annually. Even disregarding concessions, the revenue raised would be about a maximum of \$326,160 or the equivalent to about 2.5 full time positions with support (vehicle, allowances etc) in the government.
- Much will be offered the Legislative Council review in terms of supposed lost revenue from hunters should deregulation occur. However, it is possible the hunting experience will improve since I am suggesting restrictions be imposed by landowner/managers so a greater variety of opportunities may exist. There would still remain 'blocks' of landowners/managers responsible for very significant areas of land within the core range wanting to manage deer much as per the recent past and deregulation may not impact them at all. Indeed their 'herds' may become relatively outstanding in terms of hunter values and therefore more valuable in terms of the fees and services they can demand from hunters. Moreover, they may have greater choice of hunters.
- Much will be also be offered the Legislative Council review in terms of the difficulties of deregulation but it is merely fear of paperwork and abuse from some hunters averse to change. In discussions with senior management and a stream of ministers (In my 32 years employed in the department) on the subject it was plain the main reason deer retained a practical status above and beyond their legal status and common sense was the 'fear' of the lobbying power of hunters (hundreds if not thousands of letters scare ministers). Indeed these same hunters were sometimes encouraged by scare mongering and tip-offs from game management staff, a somewhat self-serving, perverse system. Part of the reason deer are afforded such extravagant protection is because some DPIPW staff hold the kudos they receive from hunters for such protection in very high regard.
- The situation with captive deer and the potential they represent for even further range expansion remains problematic and should deregulation of wild deer occur, the management of captives still needs to be addressed. Deer farms only exist because wild commercial harvesting is not allowed (compliments of hunters' lobbying) so allowing wild

commercial harvesting may partly (mostly) solve the captive situation. However, there certainly exists the potential for mischievous translocations by hunters disgruntled with deregulation. Should the department do the obvious and deregulate wild deer, I imagine all the effort and intellect that has so far gone into protecting such could produce a strategy to counter those risks captive deer present; indeed many DPIPWE staff are champing at the bit for exactly this change.

In summary, I consider the obvious benefits of deregulating wild deer to the status (or more precisely, lack of it status) of Brown Hare to overwhelm the largely presumed costs. In recent years I have noted vastly increasing damage of natural bush (including in World Heritage areas) and farm assets by deer and feel that damage and the clear inevitability of more damage should nothing substantial change, and the continued distraction protection of deer is to nature conservation means fundamental measures should be taken, deregulation being the obvious.

19/6/16

Yours Sincerely



Nick Mooney

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