



Sporting Shooters Association of Australia (Tasmania) Inc

INCORPORATED IN TASMANIA

PO BOX 516, Glenorchy, Tasmania 7010

Mob: 0439949158

Email: - Secretary@ssaatas.com.au

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

Re; **Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania.**

Dear Ms Mannering,

The Sporting Shooters Association of Australia Tasmania Incorporated, (SSAA (Tas)) wishes to make a submission to the **Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania.** Our members, Council and executive have broad and long experience in this subject area, and believe we can contribute substantially to this process.

SSAA (Tas) has over 4300 members. As the State body, it is a key role is to provide policy advice and advocacy on matters of State and National significance. Our members have a deep interest in outdoor recreational pursuits, including hunting, fishing and access to public land for 4WD driving. Many of the hunters are also deer hunters, both in Tasmania and further afield. The Executive of our Association has had long involvement with Fallow deer, both in the field and in policy forums.

The Terms of Reference (TOR's) are noted. For ease of reference, we have set out the submission under sub headings relating to the TOR's. We have taken the liberty of including a preamble to give our views regarding the population of Fallow deer more broadly.

Preamble - Deer Population and Dynamics

Fallow deer have been in Tasmania for around 180 years. Fallow deer are a typical herbivore, with an annual breeding cycle and an ability to breed from a relatively young age. They have the capacity to multiply at a very high rate, perhaps 20% - 60% of the total population per annum. In herbivore populations, young and sub adults are especially susceptible to predation and adverse environmental conditions. Herbivore populations typically show capacity to boom, balancing the busts that come with changing environmental conditions.

Given this potential in the context of the favourable available habitats, the current population of Fallow deer is quite low. It would have to be concluded that this is a consequence of management, intended or otherwise by humans. However a recent paper by Potts et al, *Predicting the future range and abundance of fallow deer in Tasmania, Australia*, suggested that the current population would

by 2050 (in uncontrolled circumstances) increase to a large number of deer. This seems to ignore the past evidence of control.

This modelled prediction is based on assumptions made on some apparent recent increases in numbers, rather than looking at the longer term evidence. It should also be noted that one assumption in this paper suggested the population could reduce or disappear. Thus the model can produce significantly different outcomes, based on the assumptions. Any model needs to be viewed as indicative, rather than a reflection of reality.

So why is the current population so low in relation to its potential and the period of acclimatisation in Tasmania? Fallow deer are a grazing species that favour dryer rangelands with open forest patches. These landscapes are also favoured by European agriculture. They are not a species of closed wet forests, or high altitude moorland.

Thus they are in our favoured economic landscapes and as numbers grow and potentially come into conflict with agriculture etc. they almost invariably become subject to control pressure and closer management. It is unlikely that they will be ever be left "uncontrolled".

In the last decade numbers of deer have apparently increased above the longer term trends, but SSAA (Tas) suggests this increase is more apparent than real, due to;

- Drought (Concentrating animals where there is forage)
- Intensive agriculture (Providing increased and high nutrient forage, particularly when combined with drought)
- Escapes or releases from captivity (increasing the range)

This apparent increase has resulted in a significant ramp up of control pressure, which is being managed proactively by the Department of Primary Industries Parks Water and the Environment (DPIPWE). SSAA (Tas) contends that this will result in a fairly rapid stabilisation of numbers and probably a population decline in the next few years if these measures are allowed to run their course. SSAA (Tas) also commends DPIPWE on its approach to balancing the various interests and required outcomes.

Environmental Impacts

There are of course some who would like to see no Fallow Deer in the landscape on the basis that they are "feral"? What does feral mean? Probably nothing. Feral is a fashionable word, used to demonise species, especially introduced ones, as a means of getting licence to eradicate them or the like, regardless of their pest status. Labelling animals feral is not necessarily helpful; the discussion is more usefully had around whether animals are pests or not, regardless of their origin.

One environmental concern can be observed in the statement by Potts et al; *"Our results identify areas at high risk of impact from fallow deer in the near future, including ecologically sensitive areas of Tasmania (e.g. the Tasmanian Wilderness World Heritage Area)."* In our view, ecologically sensitive places like the high altitude parts of the Tasmanian Wilderness World Heritage Area (TWWHA) are not favoured Fallow deer habitat and it seems difficult to think that they ever will be?

However, through the Tasmanian Forest Agreement process, areas set aside for conservation have expanded the boundaries of the TWWHA, and replaced production forests on the borders of agricultural lands. Most of these new reserves are hardly ecologically sensitive and now represent a broad pest management issue for the agricultural community. They contain Fallow deer but they

are unlikely to be degraded by them. The Inquiry should be wary of broad generalisations which imply fallow deer are a greater problem than they are.

Returning to a broader ecological view, in Tasmania the key pests are not "feral" but are "native". Tasmania's greatest pest problems are native animals, Wallabies (Bennett's and Rufus) and Brushtail Possums.

The environmental impact of a pest will be a function of the density, habitats and the habits of the particular species, and this is worthy of some comment in this context.

Spotlight Surveys (DPIPWE - *Annual State-wide Spotlight Surveys Tasmania 2015*) of the three native pest species show a general increasing trend in density of these animals. Forester Kangaroo and Wombat sightings in these surveyed areas also show fluctuations but recent significant increases.

Surveys of deer densities in specific localities over a period of 35 years by DPIPWE show there has been a gradual trend increase over time. These figures however also show wide fluctuation in densities on a year to year basis.

None the less, given the huge number of native herbivores in the landscape, coupled with stock, particularly sheep in rough grazing lands, it is virtually impossible to ascribe any significant general damage to deer. In some specific localities where densities may be high and stock excluded, some damage may be apparent and assessable, but it is argued that these occurrences are only going to be relatively isolated under current numbers and should not be accepted as the norm.

Given we consider that numbers will not reach the levels, or into the habitats some have hypothesised, it is our conclusion, particularly in light of our own anecdotal experience, that deer present a minor and controllable environmental nuisance.

Impacts on Commercial Activities on Private Land

The focus of this TOR has taken to be the impact on agriculture activity. The discussion on densities of the various herbivores animals in the section above is also relevant to this TOR.

As discussed in the preamble, drought and intensification of agriculture have raised the profile of Fallow deer as an agricultural pest. They can be particularly noticeable when standing around in irrigated crops and they are also highly mobile, which can confound the numbers that are in the landscape, seeming to be more than there are. On the other hand, wallabies and possums which have disappeared before or just after daylight will not be obvious, but probably be having a far greater impact on crops and forage.

Thus in relation to the pest native species discussed above, which have increased in numbers in the last 20 or 30 yrs at a much greater rate and to a higher grazing load than deer, it is considered that the impact by deer is probably generally overstated, though in obvious cases the local impact will be high and control will be required.

The great conundrum for the agricultural community is that the opportunity to hunt Fallow deer attracts hunters to properties with a general pest problem. Hunters in turn are generally required by the landowners to undertake crop protection activities on the native pest species, either in exchange for deer hunting rights or as an adjunct to paying hunting or trophy fees.

The DPIPWE Spotlight Survey paper previously referenced reports results by regions. Interestingly the Central region, which roughly aligns with a significant part of the Midlands, and is also referred

in deer management lexicon as the “traditional deer range”, shows that the density index of the three pest species is defying the upward trend in the other regions, either being stable or in decline?

Why is this so? Perhaps it is due to the pressure that is being exerted by the more effective landscape level control that is occurring on deer carrying properties. Certainly away from the Midlands, organised game management is far more ad hoc and less effective.

Whether this is paying back the agricultural community in increased yields would be hard to directly quantify, however our experience suggests the balance would be favourable, although there are always some who will not be content until all extraneous grazing pressure is eliminated.

Deer do also present the issue of being susceptible to some stock diseases and can thus be a source of infection. Of course the irony is that the diseases have often gone from the stock to deer in the first place. Many of these diseases are now endemic to the environment and will persist with or without deer. It would seem that deer control, rather than elimination of all deer, is the most effective way to minimize this cross infection whilst maintaining other benefits.

Partly Protected Status

From past experience, it would seem that the section of the community that like to label things (i.e. deer) as feral, are also offended by the notion that Fallow deer are “Partly Protected” under Tasmanian legislation.

Looking beyond the simple optics, it is more sensible to consider what this status means and what other animals are Partly Protected.

Partial protection is used as a mechanism to allow hunting of species as game, during specified game seasons. Wallabies, duck, pheasants and mutton birds are some of the other Partly Protected species. Some are native, some are not.

SSAA (Tas) is highly supportive of this approach; it recognises the long standing traditions of hunting in this State and allows hunters to access a range of abundant resources without having to resort to excessive levels of red tape. It also provides an income for the management of these species, for example 5,050 deer licences sold in 2016 probably contributes over \$300,000 to the State Government.

The partial protection status doesn't stop control measures outside or during the game seasons. Crop protection permits are available for control of excessive numbers.

There are some who would like to see the partial protection status removed from Fallow deer so that they could become subject to unrestricted control. This would probably have a raft of negative impacts;

- Animal welfare issues during the fawning period over summer;
- Loss of income for the Government;
- Loss of income for properties charging hunting fees;
- Loss of income for regional businesses;
- Reduction in the number of hunters in the landscape to undertake browsing animal control;
- Overall increase in the browsing pressure on the environment and agriculture; and
- Significant increase in poaching and unlawful entry on public and private land.

It is considered that the number of perverse outcomes that would flow from such a decision would be quite alarming. The partial protection status of Fallow deer is a sensible pragmatic management position and should be maintained.

Commercialisation Opportunities

Game Meat

There a small number of individuals who have been lobbying hard over the last decade for access to the wild Fallow deer population for the supply of game meat. SSAA (Tas) has had some exposure to this debate and although we can't say we have studied the business model of these proponents, it would seem that commercialisation has some fundamental difficulties that would also probably result in more perverse outcomes for the broader hunting and agriculture communities than in the other benefits.

Some key elements impediments to commercialisation would be;

- Profitable harvesting requires large populations – the patchiness, mobility and avoidance capability of deer make it hard to believe that the numbers required will be available to sustain a consistent supply
- It is clear from both the Tasmanian (e.g. *Final Report – April 2011 Alternatives to 1080 Program Australian and Tasmanian Governments*) and mainland experience that commercial wallaby and kangaroo harvesting does little to control destructive populations. It is not profitable once numbers drop to levels which are still well above the reductions needed to effect real population control.
- The product is likely to be highly variable. Product consistency is a key commercial requirement in this day and age.
- Giving the animal a monetary value will increase the level of poaching with all the farm management and safety issues that go with it.
- Meat hygiene rules and requirements make entry to the industry expensive and given the other impediments addressed above, would mean that very few operators would be able to be part of the supply chain.

There has been long running tension between the costs of deer farming and the returns that can be made. Deer farming is a specialised industry and although it continues to exist in Tasmania it is not a mainstream pursuit, having contracted from its previous levels. Thus the question must be asked if the animals can't easily be profitably grown in large number behind the wire in Tasmania, will the access to field shot wild deer undercut the returns to this industry? Additionally, how is it possible to harvest sufficient animals of suitable quality with a reasonable return to the harvester to make a viable industry for all those concerned?

SSAA (Tas) is unconvinced that a Fallow deer game meat industry is of broad economic benefit to the Tasmanian community.

Value of Hunting to Regional Tasmania

The proponents of commercial use of deer tend to focus on the game meat potential and ignore the current value of hunting to regional Tasmania. This value is realised in a number of ways;

- Trophy fees to landowners
- Taxidermy fees
- Payment for fuel, food, ammunition, camping equipment, etc.
- Specialised hunting properties and guiding activities

No data is available for Tasmania, but it is pretty clear the value of the economic activities is likely to be quite substantial. The loss of a large portion of stable economic activity in regional Tasmania with

the contraction of the forest industry in the period 2009 – 2012 makes it clear that single purpose outcomes can often have broad negative consequences for a substantial number of people.

Therefore this value should not be underestimated; The Department of Environment and Primary Industry (DEPI) in Victoria published a study, *Estimating the economic impact of hunting in Victoria in 2013*. The study was based on hunter returns and the key points section on page 24 makes particularly interesting reading, starting with the following paragraph;

"The total expenditure for hunting game animals was estimated to be \$282 million. When pest hunting by game licence holders is included the estimate is \$417 million. 42% was on off-trip expenditure items and 58% on on-trip expenditure items. 40% of expenditure occurred in metropolitan local government areas (LGAs) and 60% in regional Victoria."

It is not the intention in this submission to make a report on this study, however it cannot be stressed too highly that we need to be cognisant of the economic benefits we already have under current arrangements.

It is also worth noting that although the DEPI report did not specifically address the residency of hunters, it is clear that many Tasmanians are make the journey to Victoria to hunt, especially the deer species and thus some economic activity is both being exported and foregone in this State.

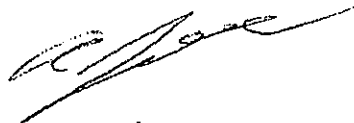
Summary

The SSAA (Tas) welcomes the opportunity to make this submission to the *Legislative Council Inquiry into the Wild Fallow Deer Population in Tasmania*.

It is the view of this organisation that the current population of deer is relatively low, and the reason for this is due to past management. We also consider that the measures that are currently in place to manage it for a variety of outcomes are quite adequate. This management has adapted over time and this organisation has been a party to this adaptation.

The recommendation of wholesale changes to the current situation would be seen as detrimental, especially if based on the views of interest groups without the long term commitment and input that ours has made to deer management. We believe that Fallow deer have a legitimate place in the Tasmanian landscape and that hunters offer the best medium for control of Fallow deer, both in agricultural and environmental situations, as well as providing a significant amount of economic benefit to regional communities.

SSAA (Tas) would welcome the opportunity to further discuss these or other issues with the Inquiry. However please note we will be constrained in this capacity by the upcoming school holidays.



Yours Sincerely
Andrew Judd
President
SSAA Tasmania Inc
28/6/16

Allison Waddington

From: donald R <riddell_dl@internode.on.net>
Sent: Wednesday, 29 June 2016 1:55 PM
To: DEER
Cc: 'Secretary'
Subject: Inquiry into Fallow Deer by Legislative Council
Attachments: Leg_Co_Deer_Inquiry_Submission_SSAA(Tas).pdf

Dear Ms Mannering,

Please find attached submission to above the Inquiry by the Sporting Shooters Association of Australia Tasmania Incorporated.

I would be obliged if you acknowledge receipt.

Your sincerely

Donald Riddell
Senior Vice President
SSAA Tas