

# **Australian Deer Association NSW**

**Response to the draft report: Shared  
Problems – Shared Solutions**

**25 May 2016**

“The Australian Deer Association (ADA NSW) remain strongly supportive of the Natural Resources Commission and the Baird Government throughout the review process. We appreciate the opportunity to be involved in such an important initiative and hope to work together with government to achieve shared access to private and public lands which in turn delivers better solutions.

NSW executive, Australian Deer Association

The following paper outlines the Australian Deer Associations (ADA. NSW) point of view on the issues, current status and draft recommendations outlined in the Deer management – Pest animal management review draft reports.

Most critically the ADA NSW opposes the listing of deer as a pest animal.

We feel a better solution will be generated through shared access to public and private land and retaining the current DPI system to enforce compliance and control of deer numbers.

## **Shared problems – shared access – better solutions**

### **Overstating the problem**

It is the opinion of ADA NSW that the Natural Resources Commission (NRC) has clouded some issues in the Pest Animal management review and that specific evidence to support key findings is missing.

One example is the risk assessments undertaken of non-native species and assessments by the Invasive Plants and Animal Committee 2015 with reference to deer. Where is the evidence that Deer pose an extreme risk to biosecurity?

As well, the report states, “deer numbers have increased by 30%”. Where is the evidence to substantiate these figures and what are the densities/KM2 in NSW?

Further to this we see some of the NRC data on deer as not being NSW specific. The use of overseas statistics are not relevant in NSW especially with regards to local biosecurity and biodiversity.

We do not agree with reports by West & Saunders 2007, Strahan & Van Dyck 2008, that support that “deer are the most important emerging pest animal”.

We argue against this and feel that to date deer have been a very low risk to biosecurity/Biodiversity and continue to be so.

## **Listing deer as pest animals is not the right answer**

Throughout this review process we have argued that listing of deer as pest animals is not the right answer. We still feel this.

As pests deer's will be killed using poisons such as 1080 sodium fluoroacetate which is both insidious and inhumane.

We acknowledge the need of farmers to control deer populations and recognise that one of the main drivers for the review was the request from the farmer's federation to make the control of deer on their properties less regulated.

However the current 'G' licence system ensures that deer are shot in a humane manner. This compliance component will not exist under a deer as pest regime and the humane killing of deer may not be able to be policed adequately. That is – people will be able to gut shoot an animal and let it die a slow and painful death which is not only is inhumane but also will be done out of sight and regulation.

In fact, we argue that the current DPI system has a means of enforcing compliance and control of deer numbers.

## **Enforcing compliance and control of deer numbers under the current DPI system**

To develop an economic and sustainable control plan that favours, landholders/managers, hunters and government departments we believe that the retention of the current DPI system with the addition of shared access to problem areas is the only answer.

Deer numbers are only high in areas where they are protected by either the land owner who has a vested economic interest or public land managers that are reluctant to allow hunters to control them. The adoption of the DPI model would see the end of high numbers of deer on public lands at very little if any cost to government.

This compared to the Supplementary Pest Control (SPC) program that cost in excess of \$11 million dollars and achieved virtually no benefit in animal reduction and no enhancement of biodiversity.

Under the current system all hunters have to be licensed firearms owners and meet strict requirements in order to get a firearm licence. As such, we argue that all hunters are competent and compliant.

Therefore by using the DPI risk assessments and given access to problem areas, hunters can control deer in areas where overabundant numbers exist by ground shooting alone.

**The NSW "Game and Feral Animal Act 2002" regulates the hunting and control of deer in an orderly manner. This system should be extended into National parks and the deer problem will be a "shared problem with a better solution".**

## Our response to the issues outlined in the draft report

The below two tables outline our response to the draft reports. We have aligned our response with each of the relevant bullet points listed in your tables.

### Document 1

The issue	Current status	Draft report recommendations
<ul style="list-style-type: none"> <li>▶ Recreational hunting is a legitimate and valuable activity.               <ul style="list-style-type: none"> <li>▶ <i>Agree. It has cultural and historic roots and generates economic benefits for local businesses</i></li> </ul> </li> <li>▶ Recreational hunting alone is not effective in controlling pest animal numbers, however it can play an important role in an integrated pest management program.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. Recreational hunting can keep deer numbers under control if hunters have access to the land they reside on. With an intergrated plan by land managers the DPI model and "R" licensed hunters deer could be managed sufficiently to keep the numbers under control. This has proven to be the case in State Forests throughout NSW</i></li> </ul> </li> <li>▶ The contribution of recreational hunting in controlling pest populations is constrained by over regulation.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. Regulation is necessary to make compliance possible and to reassure land managers and non-hunters there is control over hunters</i></li> </ul> </li> <li>▶ Recreational hunters face different rules for deer than for other pest animals. This causes unnecessary cost and red tape.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. Recreational hunters accept this cost and rules so as to undertake their chosen activity in a manor acceptable to the</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ Recreational hunters require a licence to target deer on private property, however this is not required for other pest animal species such as foxes or pigs.               <ul style="list-style-type: none"> <li>▶ <i>The current deer hunting system is excellent. It has a Firearms licencing component that requires a hunter to be of good character and also includes the following components:</i> <ul style="list-style-type: none"> <li>▶ <i>Education</i></li> <li>▶ <i>Humane killing</i></li> <li>▶ <i>Ethics</i></li> <li>▶ <i>Awareness of legislation</i></li> </ul> </li> <li>▶ <i>This could be expanded to a marksman component</i></li> <li>▶ <i>The current system allows enforcement of compliance to regulations</i></li> <li>▶ <i>Furthermore all the above should be expanded to areas where there are problems by unlicensed uneducated and non-compliant pig doggers and non-compliant bow hunters</i></li> </ul> </li> <li>▶ 'Fair chase' restrictions for hunting deer restrict effective population control. The process for suspending the restrictions creates an unnecessary burden for both the community and government.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. (See above) There is no evidence to back up the above statement! Both the community and the government should be accountable for the humane destruction of both</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ Feral deer should be no longer listed as game.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. Deer have a much higher cultural and human value than other species now listed as pests. The continued increase of the economic value both through local spending and the utilisation of venison for human consumption and the cultural use of this resource by Hunters and non-hunters gives the deer a game status</i></li> <li>▶ <i>The wholesale slaughter of deer by control methods that include poison, are very unpalatably for deer hunters</i></li> <li>▶ <i>The purposes of this suggestion are to make control/eradication of deer more achievable. It is our opinion this is just so that they may be poisoned like all other pests</i></li> <li>▶ <i>Deer have a much greater status than pests throughout Australia</i></li> <li>▶ <i>Densities are high in four recognised area due to the inability of recreational hunters to enter these areas and control them because the land managers will not grant access</i></li> </ul> </li> <li>▶ 'Fair chase' restrictions, including a ban on night shooting should be removed.               <ul style="list-style-type: none"> <li>▶ <i>Disagree. This is not necessary as a removal of the regulations by DPI already allows for night shooting</i></li> </ul> </li> <li>▶ There should be no loss of access for recreational hunters. Access to target pest animals on private land should be further improved.               <ul style="list-style-type: none"> <li>▶ <i>Agree. By educating land owners about the safety of using "R" licence hunters to help control numbers under compliance controlled system such as the DPI model.</i></li> </ul> </li> </ul>

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<p><i>public. Under the current DPI model the control of deer and pest species is undertaken in an orderly and safe manor with compliance under the watch of DPI compliance officers</i></p> <ul style="list-style-type: none"> <li>▶ Deer have increased 30 percent across NSW over a five year period to 2010. Without a change in management approach, feral deer populations have the potential to occupy almost the entire NSW.</li> <li>▶ <i>Disagreed. The increase in deer population has resulted from recreational hunters having been denied access to the land occupied by these deer, be it public land under the management of public land management or private land where access is closed to recreational hunters.</i></li> <li>▶ <i>This could easily be rectified by controls and education of hunters to meet the requirements of land owners and managers. It may even be expanded to give private land owners some financial benefit and public land management savings on their cost of deer reduction The DPI model in forests has been a financial success with forestry now not expending any money to control pests. WE FEEL THAT THIS IS WHAT , "SHARED PROBLEM SHARED SOLUTIONS" is all about.</i></li> <li>▶ <i>ADA would welcome involvement in population studies and environmental impact assessments</i></li> </ul>	<p><i>pest and game animals</i></p> <ul style="list-style-type: none"> <li>▶ <i>The suspension of the regulations is a simple and easy process. Both private land owners and public land managers may apply for the regulations to be lifted for the purpose of animal number reductions. This reduction should be under taken by suitably qualified recreational hunters.</i></li> <li>▶ <i>Poisons are not the answer for deer</i></li> <li>▶ <i>Recreational hunters are not involved in regional pest animal management planning. Opportunities for more effective pest animal control and enhanced recreational hunting opportunities are being missed.</i></li> <li>▶ <i>Agree. This could easily be corrected by involving "R" hunters in the planning of local control operations</i></li> <li>▶ <i>ADA NSW includes over 1000 members, we would be more than happy to be involved and engaged in future planning and deer reduction opportunities</i></li> <li>▶ <i>Programs like Farmer Assist that link recreational hunters with farmers are effective but require greater support</i></li> <li>▶ <i>Agree. The farmer assist program should be expanded to include all AHO and their qualified recreational hunters. Currently this is a SSAA monopoly that needs to be expanded to all "R" licenced recreation hunters</i></li> </ul>	<ul style="list-style-type: none"> <li>▶ <i>Recreational hunters will no longer require a general licence to target deer on private land, reducing cost and red tape.</i></li> <li>▶ <i>This will allow non- qualified, inhumane. Non- ethical practices to be used. These people will not be registered with the compliance officers at the DPI and will lead to a breakdown of the structure now in place</i></li> <li>▶ <i>The management of feral deer should be included with other pest animals into regional pest animal management plans.</i></li> <li>▶ <i>While deer are an emerging species they are still quiet controllable with the use of "R" licence hunters if there is access</i></li> <li>▶ <i>This will also see a significant revenue stream lost</i></li> <li>▶ <i>Recreational hunters should be invited to be involved in regional pest animal planning and in delivering regional pest animal control programs.</i></li> <li>▶ <i>Agree. Recreational hunters should be included as part of the initial planning, not just some small mopping up operation at the end of a poisoning or helicopter program.</i></li> <li>▶ <i>Increased support for programs that link landholders with recreational hunters.</i></li> <li>▶ <i>Agree. There should be benefit for the landholders and for the recreational hunters</i></li> <li>▶ <i>The expansion of the DPI model on to private lands would give private land owners the security of compliance control if required</i></li> <li>▶ <i>Continued access for recreational hunters to selected state forests.</i></li> <li>▶ <i>Agree. "R" license holders have been instrumental in controlling deer and pests in forests. At the present time there are no forests that are infested with high numbers of pests or deer. This has been achieved at no expense</i></li> </ul>

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		<p><i>to Forests NSW</i></p> <ul style="list-style-type: none"> <li>▶ Continued access for volunteer shooters to national parks through the Supplementary Pest Control trial. <ul style="list-style-type: none"> <li>▶ <i>Disagree. This program has been a monumental financial failure. The outcomes are pathetic. It is an-conceived monopoly with SSAA to the detriment of all others was a political convenience of previous Liberal politicians. Let us now break up what has transpired during the three year trial and the little it has achieved</i></li> <li>▶ <i>This will be addressed by others, but our comments above are sufficient to convey our thoughts</i></li> </ul> </li> <li>▶ Recreational hunters of game birds will require a restricted licence, rather than the current general licence. <ul style="list-style-type: none"> <li>▶ <i>Agreed. "R" hunters will be happy with these requirements</i></li> </ul> </li> </ul>

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<ul style="list-style-type: none"> <li>▶ Feral deer have been identified as one of the most important emerging pest animal threats in NSW. <ul style="list-style-type: none"> <li>▶ <i>Disagree. Deer are not pests at the moment; they are “Game” and should stay as such for the cultural and economic benefit of genuine “R” licensed hunters</i></li> <li>▶ <i>A broad statement where are the studies and statistics to support this statement. Deer are not out of control in any area that is accessible to “R” license hunters</i></li> </ul> </li> <li>▶ Feral deer impact negatively on agricultural productivity through grazing pressure and destroying property such as fences and gardens. <ul style="list-style-type: none"> <li>▶ <i>Disagree. Destruction of fencing by deer is far, far less prevalent than by kangaroos, wombats and pigs who go under/ through fences. Gardens are a non-issue as these could be electric fenced and many other deterrents like a house dog would be sufficient to alarm deer</i></li> <li>▶ <i>The issue is that farmers and their friends should be able to control deer as per the regulations governing pests. The lifting of the regulations by the DPI would go far enough to allow qualified hunters, (including friends of farmers) to undertake this</i> <ul style="list-style-type: none"> <li>▶ <i>This would include compliance with the DPI model</i></li> </ul> </li> </ul> </li> <li>▶ They impact heavily on ecosystems that are not adapted to their presence. They are also a transport hazard involved in many collisions with trains and vehicles, at times with fatalities. <ul style="list-style-type: none"> <li>▶ <i>Disagree. Let us address the heavy impact on eco systems first. Where are these systems, are they locked up in National parks; they certainly are not many on any private lands used for intensive production. If that is the case only ground shooters could reduce the numbers in a humane way.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ In NSW deer are classified as a game animal. As a game animal there are restrictions placed on their control, such as requiring shooters to be licensed under the Game and Feral Animal Control Act 2002, shooting only in daylight hours, in certain seasons and not from vehicles. <ul style="list-style-type: none"> <li>▶ <i>If deer become over populated then the regulations as endorsed by DPI can be lifted and there is provision for the deer to be controlled using vehicles, spotlights</i></li> <li>▶ <i>ADA does not agree with the use of poisons to control deer for many reasons. This would be a waste of a resource that is underutilised because of the lack of access to the resource by public land managers!</i></li> </ul> </li> <li>▶ Although these restrictions support deer as a recreational hunting resource, they restrict the management of them as a pest. <ul style="list-style-type: none"> <li>▶ <i>Disagree. Under the DPI model the deer can be controlled if there is access to the land they reside on</i></li> </ul> </li> <li>▶ Recreational hunting is generally only effective as a pest management technique when part of an integrated pest control program. <ul style="list-style-type: none"> <li>▶ <i>Disagree. By granting hunters access to the areas where the deer may become a potential pest the hunters address this problem</i></li> </ul> </li> <li>▶ As a game animal deer is generally not a focus of integrated pest animal control programs run by the Local Land Services. Pest animal resources are directed to declared pests such as wild dogs, rabbits, foxes and pigs. <ul style="list-style-type: none"> <li>▶ <i>Agree. LLS are far too busy attempting to</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ The status of all species of feral deer should be changed from game to pest animal, by removing them from the Game and Feral Animal Control Act 2002. <ul style="list-style-type: none"> <li>▶ <i>Disagree. From a “R” licensed point of view this would be very detrimental to our cultural affinity with deer. As well, it would disable the wellbeing that is driven from hunting and bonding with nature to collect for the table from the wild</i></li> <li>▶ <i>Deer have been a part of the hunters and gathers repast since time immemorial. In Australia we have been denied the use of native species to full fill this inner urge. With the appearance of deer on the scene due to the failed farmer fuelled deer industry we the hunters of Australia would like to be part of the solution and control program to make deer a valuable part of the hunting scene, not just another pest</i></li> </ul> </li> <li>▶ All species of deer should be included in a regulation addressing pest animals under the Biosecurity Act 2015, and managed using a variety of control techniques. <ul style="list-style-type: none"> <li>▶ <i>Disagree. This statement is very shallow and the documentation supporting this has not been challenged sufficiently. We would like to see the statistics that back up this statement.</i></li> </ul> </li> </ul>

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<ul style="list-style-type: none"> <li>▶ <i>The transport hazard is no different than the Kangaroo/wombat problem and statistics say that cows and horses are of much more concern. The train impacts are addressed in the document and since controls of deer this number has been eliminated with no train collisions recorded?</i></li> <li>▶ <i>Better access for trained competent hunters to areas of high collision numbers, would minimise the number of collisions</i></li> <li>▶ There are four main feral deer hotspots in NSW requiring urgent attention - Illawarra and the South Coast, Mid-north Coast, parts of the Upper Hunter and Northern Tablelands, and the Snowy Mountains region. <ul style="list-style-type: none"> <li>▶ <i>Illawarra and south coast: Refer to previous DPI controls</i></li> <li>▶ <i>Mid north coast: Hunters need access to small rural land holders under a DPI controlled scheme. NPWS have acres that are closed to "R" hunters</i></li> <li>▶ <i>Upper hunter and norther tablelands: Private land managers need education on the use of "R" hunters to manage deer numbers on the properties. This could include some financial gain to them from the hunters</i></li> <li>▶ <i>Snowy Mountains region: Locked out by NPWS. There are many areas of low public users at various times of the year,(Seasons). This should allow for an integrated control plan using some of the 20,000 "R" hunters in NSW</i></li> <li>▶ <i>NOTE: ADA NSW has over 1000 members who are both competent and willing to assist in deer control under a risk management program modelled of the DPI model. This would be a low cost management solution with current insurance and professional leadership and co-ordination</i></li> </ul> </li> <li>▶ Deer have increased 30 percent across NSW from 2005 to 2009. Without a change in management approach, feral deer</li> </ul>	<p><i>control the endemic pests such as dogs, foxes, rabbits, pigs. They do absolutely nothing to control feral cats which are the biggest predators of our native biodiversity species. How are a very small group with a very large budget, which is being increased by a levy on small acreages going to achieve what they have not achieved in the last 50 years</i></p> <ul style="list-style-type: none"> <li>▶ <i>The use of poison on deer should not be an option until The "R" licensed hunters have failed to reduce deer numbers to a manageable numbers.</i></li> <li>▶ As a game animal there are also no mechanisms available to compel landholders to control deer on their land where this may be required to meet control objectives.</li> <li>▶ <i>Agree. However this does not require complex legislation. An amendment of the regulations to make landowners comply will have the desired effect.</i></li> </ul>	

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<p>populations have the potential to occupy almost the entire NSW.</p> <ul style="list-style-type: none"> <li>▶ <i>Disagree. We think that the problem is overstated. Where are the evidence points? What are the numbers? What are the facts? The only places where deer numbers are on the increase are where they are locked up with no access by "R" hunters to control them, both on public land and private land</i></li> <li>▶ <i>The benefits of the shared problem shared solution management plan is that these areas can be identified and an plan agreed on to solve the problem</i></li> </ul>		

## Future consultation

We appreciate the opportunity to be involved in such an important initiative for the people and wildlife of NSW.

Should you have any questions about our submission document or seek further information please contact:

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