

The promotion of markets for wild boar and venison and the minimisation of barriers to potential market development is a vital element in realising the economic value of these animals as a natural resource and part of our primary industries (7.5).

It is laudable to “promote an integrated approach” (3.5) to pest animal management, but it is absurd to exclude native animals, notably kangaroos, from this approach. Kangaroo numbers in NSW have been estimated at 16 million this year, deer at 200,000. Similarly, that the regulation of non-indigenous species should be “commensurate with the risks they pose” (5) would suggest that deer, with their low overall numbers, would not require a change in management, and that their adverse impact must be localised. This impact should be well managed with existing provisions: local suspension of regulations and a deer control order through the DPI, not with a change in the status of all species of deer to pest animal.

The pronouncement that “management of deer in NSW must change” (6.2) sets an agenda and denies the validity of opposing viewpoints. Claims that deer “are recognised as the most important merging pest animal threat,” are not based on sound research. The “latent capacity for growth” of deer is cited as the reason for this threat, however the fact that deer have only one offspring per year, which contradicts this assertion, is not mentioned. The evidence offered for population increase in deer is that 7 Rusa “escapees” in the Royal National Park in 1906 expanded to 3,000 in 2004, nearly 100 years. This is hardly exponential growth. This slow population increase occurred in an environment protected from hunting.

Deer are a game animal, naturally wild. They are not “feral”, that is, they are not domestic animals that have become wild, like pigs and goats. Deer were first imported to Australia in the early nineteenth century and released as a game animal, some herds survived, many didn’t. They have long been prized as a game animal and were imported to maintain the cultural tradition of hunting. Their “heritage value” (20.3) has as strong a basis in history as that of horses.

There is no evidence of an assessment of the mechanisms within the Game and Feral Animals Control Act to locally suspend regulations in order to control deer. The previous suspensions of the Control Act need to be considered for effectiveness before there is such a significant change to the Act. If there is evidence that this is a good model, this recommendation to change the Act is unnecessary.

The recommendation (22) to “engage recreational hunting groups in pest animal management is good” and has been successfully trialled. But, to remove requirements (23.1) for hunters to be licenced to target non-indigenous species on private land would be counter-productive. What better way is there to address landholder concerns surrounding “recreational hunting”, including “illegal hunting practises, trespassing and anti-social behaviour” (p.95) than maintaining the existing game licences. This would promote ethical, safe hunting through Approved Hunting Organisations.