



Submission: Proposed Amendments to the Nature Conservation (Deer Farming) Regulations 2021

September 2021

1. Overview

Tasmania's Wildlife (Deer Farming) Regulations 2010 are due for statutory review. As part of this process, the Tasmanian government has released Draft Nature Conservation (Deer Farming) Regulations for public comment.

RSPCA Tasmania welcomes the opportunity to make this submission to the process.

The draft regulations indicate that the Tasmanian Government is planning on continuing its policy to partly protect feral deer for hunting purposes.

The RSPCA acknowledges that, in certain circumstances, it is necessary to manage populations of wild and pest animals in order to reduce adverse impacts on human activities, health and wellbeing; impacts on other animals and the environment; and also to protect the welfare of individual animals.

When undertaken, the RSPCA believes management activities must use methods that are humane, target-specific and effective.

On that basis, the RSPCA opposes recreational hunting in any circumstances due to the inherent and inevitable pain and suffering caused.

The Tasmanian Government must bring its feral deer management strategy into line with contemporary expectations by removing the partly protected 'wildlife' status deer currently have under wildlife regulations.

The RSPCA believes that it is time now to challenge that outdated thinking.

The Invasive Species Council recently released a community and science-driven strategy to control feral deer in Tasmania.

The recommendations of this report include that:

- deer be managed as a pest animal, in line with the rest of Australia;
- deer no longer be accorded special protection under the Tasmanian Wildlife Regulations;
- comprehensive surveys of deer encroachment on the Tasmanian Wilderness World Heritage Area (TWWHA) be completed;
- deer containment lines be drawn at the edge of the TWWHA and other suitable boundaries and resources secured to ensure all deer beyond containment lines are eradicate; and
- deer be eradicated from Bruny Island within two years.

We urge the state government to adopt these recommendations in their entirety.

Removing the partly protected status of feral deer will bring Tasmania's management of these animals into line with both contemporary expectations and best practice biosecurity across Australia. It will also provide the groundwork for development of a wide-ranging feral deer management strategy, which should involve input from a wide range of stakeholders.

2. Managing feral deer

Pest management vs hunting

Hunting is not the same as pest animal management, although both sometimes involves the ground shooting of animals as a control method, they are different in a number of ways.

Pest animal management programs are carried out with the aim of reducing the negative impacts on agricultural production and natural resource systems, using the most humane, target specific, cost effective and efficacious techniques available. In contrast, most hunting is primarily done as a desire to kill pest or game animals as a recreational activity.

Pest animal management programs must be carefully planned and coordinated to have a desired and lasting effect. Most recreational hunting is done on an ad-hoc basis. There is no defined objective, no planning, monitoring or assessment of effectiveness. The methods used by hunters are labour intensive, expensive and not effective in reducing populations of pest animals over large areas for the long term.

The RSPCA opposes recreational hunting, or the act of stalking or pursuing an animal and then killing it for sport due to the inherent and inevitable pain and suffering caused. Hunting has the potential to result in significant animal suffering: animals are sometimes chased to the point of exhaustion and then killed with methods that do not cause a quick and painless death.

This is especially so for a species like deer, as they are highly sensitive and will panic easily if disturbed

Hunters are not required to undergo competency assessment for shooting accuracy before obtaining a licence or permit. Although some hunters may have the skills, knowledge and motivation to minimise the suffering of their prey, many do not. So it is inevitable that some animals will endure pain and distress.

With some hunting activities and practices the potential for significant suffering is extremely high. This includes where animals are injured but are not retrieved, where dogs are used and are not controlled properly, where hunters lack technical skill, where killing methods do not cause rapid death, or where dependent young are left abandoned.

Current regulations and enforcement regimes do not prevent these things from occurring: they are an inevitable consequence of recreational hunting activities.

Codes of practice and standard procedures

The RSPCA advocates the adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities.

The 'humaneness' of a control method refers to the overall welfare impact that the method has on an individual animal. A relatively more humane method will have less impact than a relatively less humane method. A model code of practice for the humane control of wild deer has not yet been prepared but the standard operating procedure can be found at the PestSmart website: DEE001: Ground shooting of feral deer.

- Shooting should only be used in a strategic manner as part of a coordinated program designed to achieve sustained effective control.
- Although time consuming and labour intensive, ground shooting is considered to be the most effective technique currently available for reducing deer populations.
- Shooting of feral deer should only be performed by skilled operators who have the necessary experience with firearms and who hold the appropriate licences and accreditation.

3. About RSPCA Tasmania

Who we are

The Royal Society for the Prevention of Cruelty to Animals Tasmania (RSPCA) is a not-for-profit non-government organisation. We've been working to improve the lives of animals in this state since 1878.

The RSPCA is the only Tasmanian organisation named in animal welfare legislation and we enjoy the continued support of all levels of government.

The community respects our knowledge of animal welfare, which is grounded in science and based on experience. In the 143 years since the RSPCA was established in the state, we have helped hundreds of thousands of animals in need in all kinds of situations: in homes, backyards, on farms, in the wild, and at sporting arenas.

As a charity, we strive to maintain an open-door policy, so no abandoned, neglected, injured or surrendered animal is turned away or forgotten. Along with cats and dogs, the RSPCA provides assistance to a wide range of other animals, including horses, rabbits, guinea pigs, birds, goats and sheep.

During the past three years, RSPCA Tasmania has:

- Investigated over 25,000 reports of animal cruelty;
- Provided care for more than 6,670 animals; and
- Delivered information to thousands of people on animal welfare, responsible animal care and pet ownership through school, community and online education.

Our role is to act as a conduit for the community's concerns about animal welfare, to ensure those concerns are heard by our state's decision makers. So our advocacy activities are a vitally important part of our work.

Animals play a central role in the lives of many people. Most Tasmanians, whether they live in suburbia, rural properties, or in regional towns, say animal welfare is important or extremely important to them.

Clearly, the majority of Tasmanians expect improved animal welfare outcomes should be a high priority for the state government.

With an ultimate goal of improving animal welfare outcomes, we acknowledge the crucial role of humans in keeping our animals safe.

So we not only serve animals in need, but also owners and carers who require guidance and support through education and assistance in relation to domestic violence, aged care, homelessness, mental health, and more.

What we do

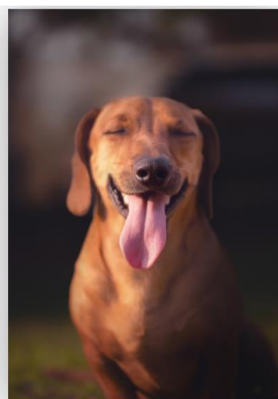
To prevent cruelty to animals by ensuring the enforcement of animal welfare laws.



Through advocacy, to promote the amendment or creation of new animal welfare legislation as necessary.



To develop and promote modern policies using scientific knowledge.



To educate the community with regard to the humane caring for animals humanely.



To engage with relevant stakeholders that enable the improvement of animal welfare.



To sustain an intelligent public opinion in regards to animal welfare.

Where we are

- Our Animal Care Centre (ACC) at Devonport is dedicated to caring for, rehabilitating and rehoming animals.
- Our Animal Retail Centres (ARCs) in Latrobe, Launceston and Hobart are our bases in the community. Animals are surrendered and rehomed through these centres; owners can access advice and supplies for their companion animals; and our ARC teams assist with local microchipping and education activities in their communities.
- Our Inspectorate operates under delegated powers from the state government to investigate and prosecute instances of alleged animal cruelty. Inspectors are co-located with DPIPW in Hobart, Launceston, and Devonport, and operate across the state. This team is supported by a call centre equipped to handle reports.
- Our team of dedicated volunteers assists across all our activities. They serve on our board; they care for animals in our ACC and ARCs; they organise fundraising events; and they support us in many other activities. We could not do what we do without these wonderful people.
- Our corporate office is located in Launceston. Supporting our frontline teams, a group of dedicated professionals work across many areas – including fundraising and marketing, policy and advocacy, volunteer organisation, project delivery and – last but not least – our administration team who answer the phones and keep the lights on.



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Corporate Office: Level 4, Queen Victoria Tower, 7 High Street, East Launceston 7250

Devonport Animal Care Centre: 108 Tarleton Road, Spreyton, 7310

Latrobe Adoption & Retail Centre: 3/135 Gilbert Street, Latrobe 7307

Launceston Adoption & Retail Centre: 3/207 Invermay Road, 7248

Hobart Adoption & Retail Centre: 55-57 Albert Road, Moonah, 7009

Animal Cruelty Hotline: 1300 139 947

