

Game Services Tasmania  
DPIPWE  
GPO Box 44 HOBART TAS 7001

By email: [gamemanagementplan@dpipwe.tas.gov.au](mailto:gamemanagementplan@dpipwe.tas.gov.au)

Dear Sir or Madam

**Re: Draft Tasmanian Wild Fallow Deer Management Plan**

The RSPCA appreciates the opportunity to make comment on the proposed plan. We understand the policy challenge the current situation poses and difficulty in balancing diverse and often opposing stakeholder views and expectations. On that basis, we recognise that this plan will provide an important tool for the government in facilitating an improved outcome moving forward.

In formulating this response, we have drawn on the submission we made earlier this year to the proposed Amendments to the Nature Conservation (Deer Farming) Regulations 2021.

This submission was underpinned by recognition that, in certain circumstances, it is necessary to manage populations of wild animals in order to reduce adverse impacts on human activities, health and wellbeing or 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. The RSPCA also advocates the adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities.

On that basis, we endorse the four management objectives outlined in the plan, namely to:

- effectively manage the impacts of wild fallow deer throughout the state
- empower farmers, foresters, and other land managers to work collaboratively with hunters to achieve tailored deer management objectives
- continue to provide evidence-based deer management
- improve community involvement, education, and awareness of deer management.

We would however make these points:

- It is clear from the data in the plan that previous approaches to managing this feral population have not worked, and that different strategies need to be considered.
- 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. On that basis, we do not support inclusion of recreational hunting as a management strategy for this feral population.
- The RSPCA recognises that feral deer are causing losses in production (pastures, crops, forestry), damaging fences and other infrastructure; and, as a result, farmers are spending significant amounts of time and money on trying to manage the current deer problem. This can result in less than desirable animal welfare outcomes.

- The RSPCA supports the adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities.
- A standard property-based wildlife management plan (PBWMP) fits within this framework and would form part of the toolbox for on-farm management of feral deer. The template should be accessible from the Game Service Tasmania website, and form part of a licencing approval process.
- 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.
- Recreational hunting can involve more than just 'shooting'. Hunted animals are often chased long distances, sometimes by dogs as well as people; other parts of the body are aimed at rather than the head; wounded animals escape without being followed up and dependent young are often left to fend for themselves. The skill level of hunters is highly variable, and some are not motivated or required to follow standard procedures or best practice. The consequences of these practices are that many animals will endure significant suffering and a protracted death
- The RSPCA therefore believes 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.
- In our view, then, the requirement for recreational hunters to be involved in management planning is, at best, superfluous and, at worst, entrenches adverse animal welfare outcomes.
- The RSPCA believes that the current exclusion on taking antlerless deer between 16 November and 14 March should be maintained to minimise the risk of killing lactating females and thus harming any dependant fawn.
- Whilst in principle the three zones approach proposed for managing wild fallow deer may seem useful, in practice this is neither desirable nor manageable. It has been clearly established that wild fallow deer are an invasive pest species. Thus, provisions should be made to eradicate them wherever they occur, as would be the case for any other invasive pest animal.
- Having said that, if one were to accept the zoning approach, the zones as outlined do not appear to have clearly delineated boundaries even on paper, let alone on ground where there is no way of stopping animals moving across notional boundaries. Inevitably, decisions as to zones (and therefore management) will become subjective and open to interpretation. This will not address the current ambiguities in management practice and could result in even more cost and bureaucratic red tape. We also question the need for Zone 1, as this only complicates the plan unnecessarily.

We would of course be pleased to provide further comment should that be required.

Yours sincerely



**Jan Davis**

**CEO**

*3 December 2021*