

## **RSPCA Tasmania — Submission on 2025 Deer Management Policy Review**

### **1. General Position**

RSPCA Tasmania recognises the challenges posed by populations of wild deer in Tasmania — including impacts on agriculture, forestry, biodiversity, native habitat, and public safety — as outlined in the 2025 Review Discussion Paper. [nre.tas.gov.au](https://nre.tas.gov.au)

At the same time, consistent with the welfare-centred approach of RSPCA Australia, we emphasise that any deer management must prioritise minimising pain, suffering, distress or unnecessary harm to animals — including dependent young — and that lethal control should only be considered where non-lethal, humane, and effective alternatives are not feasible. [RSPCA Knowledgebase+2](#)[RSPCA Knowledgebase+2](#)

### **2. Comments on Key Proposed Measures**

#### **Permit streamlining & simplification**

- We support efforts to simplify the permit framework (i.e. reduce DMZ1 permit types to two: Property Protection Permit (PPP) and Special Purposes Wildlife Permit (SPWP)), provided this does not erode animal welfare protections. [nre.tas.gov.au](https://nre.tas.gov.au)
- We encourage that any administrative reform retains mandatory welfare safeguards, including robust reporting on all deer taken, and clear conditions around humane methods and the handling of dependent young.

#### **Taking female deer during fawning period & dependent young**

- The proposal to allow female deer to be taken during the fawning period (mid-November to end-February) — provided “reasonable efforts are made to locate and humanely kill any dependent young” — raises serious welfare concerns. [nre.tas.gov.au](https://nre.tas.gov.au)
- RSPCA Australia policy dictates that where killing of wild animals occurs, it must be carried out in a manner that causes instantaneous death or renders the animal insensible until death, without pain, suffering, or distress. [RSPCA Knowledgebase+1](#)
- We consider that removal of female deer with dependent young inherently heightens risk of suffering for the fawns (e.g., orphaning, starvation, predation, injury), even when follow-up euthanasia is attempted. Given the high probability that dependent young may be hidden or missed, it is unlikely that “reasonable efforts” will suffice to ensure welfare standards.
- On welfare grounds, we urge that fawning-period protections remain. If females must be taken, it should only occur outside the fawning period, or under strict, enforceable conditions — including veterinary involvement (where possible), appropriate fallback for orphaned young, and prohibition on removal of does with dependent fawns.

#### **Humane control, compliance with Codes/SOPs**

- We support the requirement that any lethal control be conducted only by skilled, accredited operators who hold appropriate licences — as endorsed by RSPCA Australia’s position on wild-animal management. [RSPCA Knowledgebase+2](#)[RSPCA Knowledgebase+2](#)

- If deer control proceeds, it must comply with the relevant national (or state-adopted) codes of practice and standard operating procedures for humane killing — for example the NATSOPDEER002: National Standard Operating Procedure: Ground Shooting for Feral and Wild Deer. [pestsmart.org.au+1](https://pestsmart.org.au+1)
- We urge that updated Animal Welfare Guidelines referenced in the Review be developed in close consultation with the Tasmanian Game Council and the Animal Welfare Advisory Committee — with transparent public reporting of welfare outcomes, compliance rates, and non-lethal alternatives trialled. [nre.tas.gov.au+1](https://nre.tas.gov.au+1)

### **Opposition to recreational hunting as a principal management tool**

- Consistent with RSPCA Australia policy, RSPCA Tasmania remains opposed to the use of hunting for sport or recreational purposes as a wildlife-management tool. The act of stalking or pursuing animals for recreation inevitably causes suffering, injury, distress or death. [RSPCA Knowledgebase+1](#)
- Therefore, while we recognise that some deer management may require removal of animals, we strongly oppose any proposals that treat recreational hunting as equivalent to, or substitute for, evidence-based, welfare-focused population control strategies.

### **3. Recommendations**

On the basis of the above:

1. Maintain a strong fawning-period protection for does and dependent young; do **not** allow unrestrained removal of female deer during fawning season.
2. Ensure that any lethal control is strictly limited to cases where non-lethal alternatives have been considered and deemed ineffective; and that it is carried out humanely, by licensed and trained operators, under codes/SOPs that guarantee instantaneous death or loss of consciousness with minimal distress.
3. Require mandatory reporting of all culls (numbers, sex, age, location), including dependent-young outcomes, and make this data publicly available to enable community and scientific oversight.
4. Prioritise non-lethal management strategies (e.g., exclusion fencing, habitat modification, fertility control if viable, property-based wildlife management plans, community education) — wherever feasible.
5. Exclude recreational hunting from the core deer-management strategy; where hunting is permitted, ensure it is tightly regulated, not promoted as de-facto population control, and does not compromise welfare standards.
6. Ensure that any updated Animal Welfare Guidelines are prepared in consultation with RSPCA Tasmania (or relevant state RSPCA), and include clear, enforceable welfare standards, as well as monitoring and review mechanisms.

### **4. Conclusion**

RSPCA Tasmania recognises the serious environmental, agricultural and social challenges posed by wild deer in Tasmania, and supports a balanced, evidence-based approach to deer management. However, we believe that animal welfare must remain central to any management regime. We urge that the 2025 Review outcomes reflect a welfare-first approach — favouring non-lethal methods where possible, protecting dependent wildlife, and ensuring humane, transparent, tightly regulated control only as a last resort.

If desired, RSPCA Tasmania would be pleased to provide more detailed drafting input for the updated Animal Welfare Guidelines for deer control, or to participate in any working groups that consider non-lethal management strategies or welfare oversight.