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## Sporting Shooters' Association of Australia (Inc.)

PO Box 2520, Unley, South Australia 5061

Phone: (08) 8272 7100 Fax: (08) 8272 2945

Email: [spoh@ssaa.org.au](mailto:spoh@ssaa.org.au) Internet: [www.ssaa.org.au](http://www.ssaa.org.au) ABN 95 050 209 688

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The Project Team  
Feral Deer Management Strategy  
Biosecurity Queensland  
Department of Employment, Economic Development and Innovation  
GPO Box 46  
BRISBANE Qld 4001

Dear Sir/Madam

### **Response to *Feral Deer Management Strategy 2010-2015* by the Department of Employment, Economic Development and Innovation, Biosecurity Queensland**

The Sporting Shooters' Association of Australia (SSAA National), Australia's largest sport shooting and hunting organisation, would like to provide feedback on the above Strategy. SSAA National represents more than 130,000 individuals nationally, with many of these individuals having a keen interest in the management of wild deer, not just in Queensland, but across the whole country.

Our response will be presented to two sections: responding to the four questions outlined in the beginning of the Strategy; and then making comment on specific sections of the Strategy document.

#### **Response to the questions posed in the Strategy**

**Question 1 Will the proposed strategic actions adequately address the challenges to feral deer management in Queensland? If not, what further actions are required?**

The Draft Strategy, as presented, fails to detail the specific challenges to wild deer management in Queensland. The strategies or strategic actions discussed in the document are almost identical to other pest animal strategies that have been produced in the past. It could be said that this document is nothing new, but is simply a 'cut and paste' job from one species to another that has failed to bring about or propose new or innovative ways of managing wild deer in Queensland.

It is widely accepted that there is limited scientific knowledge in regards to the impacts of wild deer in Queensland, or indeed to the whole of Australia. It is premature to develop a

management strategy until more is known about the ‘actual’ impacts of wild deer. This is a very important concern because any strategy developed otherwise would create division within the broader Queensland community, where wild deer is valued differently by many different people. Such division within the community would be counterproductive and simply a recipe for disaster (or failure) for any proposed management strategy.

As a stakeholder in a collaborative research project run by The University of Queensland, SSAA National is looking forward to quantifying the actual impacts of wild deer. Any attempt to implement a strategy based solely on a species legislated status and its perceived on-ground pest status would simply not be supported by those who value wild deer. It would also be likely that the greater Queensland community would not support such a document.

**Question 2 What obstacles can you identify that will limit the effectiveness of the Strategy? Can you suggest ways the Strategy could address these obstacles?**

The Draft Strategy, as it stands, based on preconceived views that deer is nothing more than an exotic pest to most people, will have limited acceptance and therefore limited effectiveness. Without a clear demonstration of actual impacts, which can only be sourced through credible, unbiased scientific research and monitoring programs, the Strategy will not be accepted by the broader community.

The best way forward would be to introduce a five-year moratorium on the development of the Wild Deer Strategy. During this five-year period, the Queensland Government should fund and undertake additional research and monitoring programs to ensure that the impacts of wild deer in Queensland are scientifically measured and understood. The results obtained from such programs will enable the Queensland Government to work towards managing wild deer in their state.

**Question 3 What are the strengths of the Strategy? Are these strengths fully utilised in the Strategy?**

From SSAA National’s perspective, the strengths of the Draft Strategy are limited. As discussed above, the preconceived views regarding wild deer as nothing more than an exotic pest that impacts the environment will force many people to not endorse the document. The lack of real scientific quantification to support the perceived views held in the Strategy (ie, that wild deer have negative impacts in Queensland) is a key issue. Such an issue will be very hard to resolve until more effort and funding is put into unbiased scientific research and monitoring of wild deer in Queensland.

One of the Strategy’s strengths can be found in the need for effective collaboration and coordination between stakeholders. It is here where more can be done to promote hunters and hunting organisations as key players in coordinated management planning. This promotion should be across all levels of the stakeholder group - property, local, regional and state level. The promotion of innovative ways to manage wildlife issues such as the use of Property Based Wildlife Management Plans should be endorsed. Property Based Wildlife Management Plans is an additional tool to manage wildlife across private landholdings, catchments and local government areas. These plans will enhance effective collaboration and coordination between stakeholders involved in managing wild deer (and other species).

#### **Question 4 What other matters need to be addressed to ensure effective feral deer management in Queensland?**

SSAA National understands that the Queensland community has a diverse range of views on many different topics. The management of wild deer is one such topic. It is very important that when a government seeks the community to endorse a policy or management strategy (such as this case), it provides the best possible evidence to validate any views expressed within the consultation document.

The Wild Deer Strategy, in our opinion, lacks valid evidence and overstates the impact of wild deer on the environment and their potential disease risk. To gather support and prepare an effective wild deer management strategy in Queensland, the Queensland Government must seek greater consultation with the community in regards to the social values and impacts of wild deer. This must be done on the back of credible independent research across the whole spectrum of deer species found throughout Queensland to gain a better and valid understanding of their impacts.

The Queensland Government also needs to consider allowing recreational hunters better access to public lands, so hunters can assist in managing wildlife, as they do across private lands. Many areas of public land are seen by private landholders as 'reserves', where species that cause conflict can breed and disperse.

Once the above has been done, it will be easier to roll out a strategy that will get wide community support for the effective management of wild deer in Queensland.

#### **Comment regarding specific parts of the Draft Strategy**

##### **About this Strategy**

From the start of the document, unproven claims are made in regards to the impacts of wild deer. The author/s of this Strategy would benefit from reviewing studies from New Zealand that found that wild deer are not responsible for erosion and siltation (Caughley, 1983).

It is also misleading to say that 'four species [of wild deer] are already established pests...' Although it is true that wild deer have been able to establish populations across Australia, including Queensland, their 'pest status' is usually only a result of legislation. Queensland is one such case where they are a pest by legislation - they are declared Class 1, 2 or 3 Pests under the *Land Protection Act 2002*. The actual on-ground pest status of wild deer is yet to be proven or quantified by scientific study anywhere in Australia.

It will be impossible for the Strategy to provide a successful framework to 'coordinate control measures and reduce impacts' because there are too many unknowns in relation to wild deer. The overall lack of scientific knowledge regarding the actual impacts of wild deer also extends to control measures that also need to be proven to be effective.

## Summary

The general statements that appear to demonise wild deer could be used for any species, native or introduced. It would be appropriate to state that any species that is overabundant may cause some degree of financial loss on primary producers, damage to the environment and possible danger to humans. Overabundance is indeed an outcome that can be measured through research and monitoring.

The statement depicting wild deer as a ‘serious disease threat’ to our livestock industries and human health certainly warrants comment. Such a statement is simply unproven. There is no documented case where wild deer have caused loss or have threatened overseas or Australian livestock industries. During the Foot and Mouth Disease (FMD) outbreak in the United Kingdom in the early 2000s, authorities found no evidence to support the notion that wild deer were an amplifier of the disease. Wild deer were not culled as a result and they appeared only to be an end-host for the disease.

While it is known that wild deer in Australia can carry certain disease antibodies, there is no evidence to support an argument that they would infect livestock found within their home ranges. There is, in fact, anecdotal evidence to suggest that domestic stock could be responsible for transmitting diseases to deer.

## Vision

SSAA National believes that a vision to ‘manage impacts’ instead of ‘minimise impacts’ is a more sensible and practical approach.

But first, the issue about quantifying the real impacts of wild deer through scientific research needs to be addressed. Without this, the whole document is tainted by the unproven perception of the author/s that wild deer has negative impacts on Queensland.

## Desired outcomes

**Strategy 2:** By attempting to mandate ‘eradication’, the Queensland Government is setting itself up for failure. There have been many attempts worldwide to ‘eradicate’ well-established populations of mammals with very limited success. It begs the question whether the Queensland Government prefers to learn by others mistakes or go down the same path and waste resources.

**Strategy 3:** Any attempt to develop a training and accreditation process needs to be done in consultation with both commercial and recreational hunters. What are the ‘best practice management techniques’ and what information was used or who was consulted to decide this. In this case, a range of techniques which are proven to have positive effects need to be used.

**Strategy 6-7:** These strategies should be the foundation in which this document is created and then developed. The results from ongoing research and monitoring will enable our understanding of wild deer to increase and quantify their actual impacts. This will assist in accurately defining wild deer problems and drive effective management solutions across the landscape.

**Strategy 8-11:** These strategies will be hard to fulfil without the cooperation of the whole community. The demonising of wild deer throughout the Draft Strategy will hinder cooperation from many stakeholders.

## **Background**

### **1.1.1 Definitions**

#### *Best practice*

This should incorporate the humaneness of control methods. A model for assessing the relative humaneness of pest animal control methods indicates shooting as having the lowest overall welfare impact when compared to other pest animal management tools (Sharp & Saunders, 2008).

### **1.1.2 Feral deer in Queensland**

Not all deer have been imported from Europe. Indeed, some species that have been introduced into Queensland originally came from Asia. A statement suggesting that wild deer require a diet with twice as much protein than cattle needs qualification. To our knowledge, this certainly has not been proven to be the case.

### **1.1.5 Impacts**

The first two paragraphs of this section ultimately display the main problem of the Draft Strategy. It implies that wild deer cause impacts, but then states that little direct local research has been done. This implies that deer is a problem, but has no scientific evidence to prove it. Such implications will raise serious questions about the credibility of the document and will result in many stakeholders not supporting it.

#### *Impact on primary production*

It is acknowledged that wild deer may financially impact primary production when they, like many other species, become overabundant on occasions and need direct management.

Statements regarding wild deer competition with cattle and the composition of their diet are unproven. This is another area requiring further scientific research to expand our knowledge of wild deer and to assist management.

#### *Impact on social amenity*

It is acknowledged that wild deer may impact social amenity when they, like many other species, become overabundant on occasions and need direct management.

The risk of disease being passed on to humans is certainly overstated, without qualification to demonstrate that they pose a higher risk than other species.

### *Impact on environment*

The qualification of dietary overlap used in this section is misleading. The study by Hamilton indicates that dietary overlap between wild deer and macropods is only approximately 5%. When compared to species such as sheep (>20%) and macropods, the wild deer's dietary overlap is quite insignificant.

### *Disease risk*

The risk of disease is overstated. There is no proper scientific qualification to demonstrate that wild deer pose a higher risk than other species found in Australia.

The statements regarding Foot and Mouth Disease (FMD) warrants comment. United Kingdom authorities concluded that wild deer were in fact an end-host for that disease and as a consequence, did not attempt to control wild deer during a FMD outbreak in the early 2000s. Why would a similar situation in Australia be any different? United Kingdom authorities controlled the outbreak by focusing on and culling domestic stock only.

Table 1 continues to present information that overstates wild deer as a serious threat to domestic stock. For instance, the CSIRO has concluded that feral pigs pose the biggest threat in terms of screw-worm fly infestation and establishment within Australia. The reference to Chronic Wasting Disease (CWD) indicating that it is endemic in deer populations in North America is simply incorrect. CWD is said to be present only in some deer species and it is only found in some populations. This is hardly an 'endemic' problem.

## **1.1.6 Control issues**

### *Managing deer as a resource*

It is important to realise that wild deer hunters and game meat industries will continue to view wild deer as a resource. This is a fact. Although wild deer are viewed as a resource, hunters understand the need to manage them in a way to prevent problems that can be associated with any species becoming overabundant. That is why there is a need to continue research into wild deer and quantify actual impacts so management objectives can be established and agreed to by stakeholders based on up-to-date scientific knowledge.

## **1.2 Purpose of the Strategy**

Without ensuring that the set of 'strategic directions' are based on a strong foundation of scientific knowledge, it will be difficult to imagine that any management effort will achieve its desired goal.

## **1.3 Scope**

If the Strategy has been established to 'address all wild deer impacts within Queensland', why isn't the primary focus to improve the knowledge of wild deer? Logically, this should be a prerequisite to developing a successful management strategy.

### **1.3.1 Implementing the Strategy**

It has been suggested that differences in management priorities, based on the conflict between the benefits arising from wild deer and their perceived negative impacts, is a significant challenge. This situation will continue until the lack of quantification regarding wild deer impacts has been addressed.

### **1.3.2 Principles of pest management**

It would be better if this Strategy was based on Game Management principles and not so-called Pest Management principles. The difference is that Game Management uses scientific research and monitoring as a foundation to build an overall management strategy for a particular species. The Strategy, as it stands, fails to address gaps in knowledge to successfully manage wild deer populations.

## **2.1 Community awareness**

The desired outcome, that ‘the community accepts that feral deer are an issue for the community as a whole’, will not be achieved until the community is provided credible evidence to quantify actual impacts of wild deer. This can only be done through robust scientific investigation. Unfortunately, this is currently not listed as a main priority item within the strategic plan.

The suggested ‘reluctance’ of some landholders to exercise control is a result of people not taking unproven statements regarding the wild deer’s negative impacts and costs as fact.

To achieve community awareness about the wild deer issue, Strategy 1 should incorporate the need to quantify and understand the actual impacts of wild deer.

## **2.2 Effective management**

SSAA National agrees that wild deer management should be ‘tailored to suit the particular needs and requirements of individual regions’. ‘Eradication’ is a goal that will never be achievable across the board and is one that is unlikely to be endorsed by all stakeholders. A case can be made for the removal of wild deer from areas deemed to be environmentally sensitive, where credible research proves any population of wild deer will cause negative impacts.

Viewing wild deer management in the above way will ensure that research and monitoring of wild deer populations is the foundation on which effective management decisions are made. Recreational hunting groups are placed to be a key stakeholder in such regimes because their expertise and interest can be utilised in management operations. As stated in the Draft Strategy, recreational hunting groups can be used to ensure that populations do not expand their ranges or exceed acceptable levels.

We agree that community support will be a critical component of a successful strategy. It would be important to include strategies that incorporate and promote research and monitoring of wild deer to gain broader community support. By introducing innovative concepts, such as Property Based Wildlife Management Plans, the Queensland Government could introduce a mechanism to get more people involved in wild deer management.

Recreational hunters operating under these types of plans in Tasmania have provided a valuable wildlife management tool for landowners for many years. These plans should be widely promoted across the community and stakeholder groups.

Hunting organisations would be highly supportive of a strategy that included the promotion and use of Property Based Wildlife Management Plans. They would assist in the recruitment of hunters and the roll-out of such plans across areas needing wild deer management.

### **2.3 Effective collaboration**

Strategy 5 should incorporate an action focusing on the development and roll-out of Property Based Wildlife Management Plans.

### **2.4 Informed management**

Strategy 6 discusses the need to ‘improve wild deer management practices through ongoing research and regular review and adjustment of activities’. Strategy 7 discusses the need to ‘increase understanding of ecology, biology, populations and impacts of wild deer’.

The question must be asked ‘Why is the Queensland Government ‘jumping the gun’ and preparing a Draft Management Strategy before wild deer impacts have been quantified?’ The University of Queensland’s Wild Deer Research Project (referred to in the Draft Strategy) has not yet been completed and this project has the potential to identify the actual impacts of wild deer.

As highlighted many times previously in this submission, the stated impacts of wild deer are unproven and at times, simply incorrect. It would make sense that The University of Queensland’s Research Project be allowed to run its course and allow it to provide valuable information to assist the development of a Queensland wild deer management strategy.

### **2.5 Resourcing**

SSAA National supports the need for wild deer management to be adequately resourced.

Strategy 9 will benefit by including the promotion and roll-out of Property Based Wildlife Management Plans as a management tool. The Queensland Government should provide resources to help coordinate the introduction and establishment of these plans.

Strategy 11 should include liaising with hunting organisations on topics such as the effective and humane management of wild deer.

## **3. Implementation**

SSAA National supports the need for coordinated management programs that allow landowners and managers access to innovative tools such as Property Based Wildlife Management Plans. Such plans provide an ‘adaptive management’ framework that can be changed or refined over time depending on on-ground conditions and circumstances.



#### **4. Monitoring and evaluation**

Unless the Queensland Government adequately resources and views a monitoring and evaluation program as an essential component of its overall wild deer management plan, little monitoring will occur. This, unfortunately, has been a common issue affecting many past and present wildlife management programs, not just in Queensland, but across the whole of Australia.

To fulfil the ambitious list of indicators set out in the Draft Strategy, the Queensland Government must ensure broader community acceptance. That can only be done by ensuring that the Strategy is not seen to demonise wild deer and that it must balance the community's values. We continue to insist that without scientifically quantifying wild deer impacts first, the Strategy will fail to achieve its goals. Landholders and hunters will only be involved in and be supportive of a management strategy that balances their needs with others. These two groups have a financial and cultural interest in wild deer, which needs to be recognised and supported.

#### **5. Stakeholder responsibilities**

The key responsibility for the Queensland Government will be to ensure management planning is based on clear, up-to-date scientific knowledge. This knowledge must be passed down to all stakeholders to ensure that the unsubstantiated claims and beliefs found littered throughout the Draft Strategy are no longer used to form or manipulate opinion. Once there is enough quantified knowledge regarding wild deer in Queensland, all stakeholders with an interest in deer management will come together to help develop and support the best possible wild deer management strategy for Queensland.

#### **References:**

Caughley, G 1983, *The deer wars: the story of deer in New Zealand*, Heinemann Publishers, Auckland.

Sharp, T & Saunders G 2008, *A model for assessing the relative humaneness of pest animal control methods*, Australian Government, Department of Agriculture, Fisheries and Forestry, Canberra, ACT.