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Draft Hog Deer Management Strategy

Response by the Victorian National Parks Association (VNPA).

Thanks for the opportunity to respond to this draft strategy.

The VNPA is Victoria's leading member-based NGO dedicated to the protection of Victoria's natural areas. We are concerned with biodiversity protection on both public and private land and, for some time now, have been calling for increased management efforts in our natural areas, to give them resilience in the face of climate change impacts.

Many of our comments are difficult to accommodate on the supplied form, but we have followed the same headings in our response below.

We also refer you to the recent study on deer, *A Deer Mistake* by Carol Booth of the Invasive Species Council, which we understand has been sent to you. We thoroughly support the conclusions in that study.

General comments

The strategy reads as being more concerned with hunting opportunities than biodiversity protection, and is not at all convincing in its claim that increasing hunting opportunities for Hog Deer, including opportunities on private land, will result in good biodiversity outcomes. Essentially, management support for environmentally damaging species will increase their impacts on natural systems.

In this respect, the credibility and usefulness of the strategy would be greatly increased if it included one more category of objectives. *Monitoring* does get a mention in some parts of the strategy, but it is often ignored in practice. Monitoring is critical for success of any management program, and any claims for native habitat protection through deer management will remain contentious if they are not assessed by a rigorous and credible monitoring program. Such a program warrants "objective" status, and should appear as:

6. Monitoring

- ***Objective: Monitor the impacts of Hog Deer on the condition and extent of native ecological communities.***
- ***Objective: Monitor the population and range of Hog Deer.***

It should be noted that monitoring is now widely accepted as essential for natural resource management (as it is indeed for any effective management strategy). The Victorian

Government's *Land and Biodiversity at a time of Climate Change Green Paper*, for example, says that we should "develop a consistent and coordinated monitoring and reporting framework that enables reporting on ecosystem condition and threats...". And the Consultation Draft for *Australia's Strategy for the National Reserve System* similarly calls for the establishment of "scientifically credible and cost-effective monitoring and reporting systems to assess management effectiveness [and to] align those with other environmental reporting arrangements wherever possible".

Also, the draft generally comes across as a bit confused over the issue of habitat protection. The strategy sometimes refers to "Hog Deer habitat" or "suitable habitat" (eg p. 7, 3rd para, and p. 13, strategic action 3), which implies a place suitable for the maintenance of deer, while at other times the word "habitat" appears (though it is sometimes unclear) to refer simply to native ecosystems. These are not necessarily the same thing, and should not be confused in the strategy. Essentially, a native ecosystem with relatively poor ecological integrity might be good habitat for deer, but it is likely to provide greatly compromised habitat for a range of native species. The word habitat should not be used loosely.

Specific comments

A: Ecology and Conservation of Hog Deer

I think it should be pointed out that it is universally understood that protection of threatened species (or any species) is best undertaken by protecting their native habitat. And given that in many cases Hog Deer are now doing well in protected areas in their native range, and that the deer are no longer listed as threatened, there is currently no demonstrated need for their protected status in Victoria. They are a pest animal in native ecological communities here.

The statement on p. 7 that "The environmental impacts of Hog Deer have not been studied in Victoria" is inaccurate. Though they have not been adequately studied, many impacts are well known. Nevertheless, the statement calls into question the capacity of the strategy to manage the animal "sustainably". Again, monitoring and research into the impacts of Hog Deer is the most important single thing the strategy should be proposing.

The last sentence on p. 7, that "alteration to the landscape as a result of the deer is hard to quantify" is gratuitous nonsense, and implies that it is not worth investing in research and monitoring. The sentence should be deleted, and replaced with a call for systematic research.

B: The Strategy

The vision is flawed. There is absolutely no reason to sustain the Hog Deer population "within its current range" if any part of that range cannot be sustained without causing damage to ecological systems and communities. And managing the Hog Deer population to "**minimise impacts** on biodiversity" is vague, and unlikely to lead to good biodiversity outcomes.

1. Management of ecologically sustainable Hog Deer Populations.

Para 4: the dot point issues should not just be "considered", they must be identified and form the basis of effective management action.

There should be two more Strategic Actions here

- Ecological condition assessments should be made of deer habitat, and ongoing ecological condition monitoring should take place.
- Information on the ecological impacts of deer populations should be available through a public information/education program.

2. Sustainable, quality hunting programs.

Strategic action 2 is incomprehensible (what does “collate... management plans mean?”), and PV should also be responsible for monitoring on any land managed by PV.

Strategic action 3 should include public education on the ecological impacts of deer.

3. Minimise impacts and enhance biodiversity values

First, the above heading should not end with the words “where Hog Deer occur” as that implies an acceptance of existing ranges.

Given that it is “recognised that Hog Deer may have a negative impact on significant native vegetation” (p. 13, para. 1), it surely follows that it would be sensible to reduce the range of Hog Deer. The suggestion that we simply don’t extend the range is weak, a cop-out, and has little to do with professional management of a threat to biodiversity. And acceptance of the current range, even in those places where deer have been illegally introduced, gives the wrong message entirely to people with a vested interest in extending the range.

Populations of deer that are demonstrably damaging natural systems should be removed!

Also, in the first strategic action here, the word “artificial” should be removed. There should be no extension of the range of deer, whether that extension is artificial or otherwise, and the current range should be actively reduced wherever environmental damage is identified.

Partners in Strategic Actions 3 & 4 should include conservation NGOs, universities and other and scientific research bodies.

Finally, any assessment of the impacts of deer should be assessed in line with the need to maximise the resilience of natural systems to climate change impacts. This is particularly important in the case of rainforests and wetland systems, both of which are identified as highly vulnerable to climate change.

4. Private Land

In para 3, p. 14, it is claimed that “the realization that managing Hog Deer can result in benefits to biodiversity conservation and provide a supplementary source of income to landowners was first recognised in 1965 by game biologist... Max Downes... on the 85 ha Serendip farm property”. This is somewhat misleading, as:

- Serendip is not a “farm property”, but a wildlife research station.
- As far as we can ascertain, the Hog Deer program at Serendip was a breeding program, not an ecological impact monitoring program. (Ecological impacts of many feral animals were poorly understood in 1965, anyway.)
- All Hog Deer were removed from Serendip in 1985 or thereabouts, and, as far as we know, there is no information from Serendip that would give any indication that Hog Deer programs can contribute to “biodiversity conservation”.

Indeed no evidence that Hog Deer programs on private land can contribute to biodiversity protection is given in the draft report. This apparent lack of rigour in development of this strategy is further evident in the Strategic Actions on p. 18, which include no native habitat improvement, protection or monitoring measures. And the performance indicators include no indicators of ecological condition, or extent, of native vegetation.

5. Partnerships

The inclusion of scientific research bodies as strategic partners is essential if any effective monitoring is to take place.

Also, in this section, the “performance indicator” is actually a series of strategic actions.

6. Performance indicators

The “uptake of private landowners of the property-based management program” (PBGGM) is only an indicator of performance if PBGM is ecologically sound. Given that there is no evidence of this at present, it is not a valid indicator of success.

Conclusion

Hog Deer are introduced pest animals, and their protection under the Wildlife Act is now anachronistic. They would not be given that level of protection if they were introduced now, and until the Wildlife Act is suitably amended, due observance should be given to the range of other Acts, planning laws and biodiversity protection strategies that give land managers the capacity to reduce the population and range of Hog Deer, and manage surviving deer populations to avoid ongoing damage to ecological systems.

Further information

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