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Red Deer at Dutson Downs near Longford. ROHAN BILNEY

SUBMISSION TO

Draft National Feral Deer Action Plan 2022-27

Victorian National Parks Association

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Victorian National Parks Association Submission to the Draft National Feral Deer Action Plan 2022-27

Thank you for the opportunity to provide feedback Draft National Feral Deer Action Plan 2022-27.

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. The VNPA has been actively working to protect Victoria's biodiversity for over 70 years.

Submission

Deer are an immediate and growing threat to Victoria's National Parks and natural areas. Deer are now found in most natural areas across the state, with some small exceptions in the north-west areas (anecdotal evidence exists of deer pushing into these areas so far without success).

It is estimated that 1 million deer cover Victoria, impacting private and public land. VNPA has long advocated for effective and science-based control and, where possible, eradication of deer populations, including a 2019 letter from science, conservation, land management and industry leaders. The letter can be read [here](#).

As one of Victoria's leading conservation organisations, VNPA works with landcare and Friends groups across the state and has seen a drastic increase in the damage caused by feral deer across Victoria's national parks and protected areas, as well as private land conservation sites.

The Department of Energy, Environment and Climate Action (DEECA, formerly DELWP) suggests that the population of deer could be between "several hundred thousand up to one million wild animals or more". The dramatic increase is partially a result of the current legal status of deer, which makes it difficult undertake strategic, large-scale management.

According to economic analysis by the Invasive Species Council, feral deer will cost Victoria more than \$2 billion over the next 30 years. The report found the cost of not controlling the feral deer population in Victoria is estimated to be \$1.5 to \$2.2 billion over the next 30 years, based on just four sectors:

- Agriculture: \$351m to \$350m due to lost grazing and resources spent managing feral deer.
- Forestry: \$269m to \$365m from lost forestry production.
- Public safety: \$576m to \$825m from deer-related vehicle accidents.
- Social: \$308m to \$474m in social costs from reduced recreation use values.

This does not include the cost to the environment or public health should disease be spread from feral deer to livestock or water supplies. <https://invasives.org.au/publications/an-analysis-of-the-economic-social-environmental-cost-of-feral-deer-in-victoria/>

The challenge in managing feral deer is likely to be exacerbated in future, with populations expected to increase significantly over the next 30 years, driven by a combination of climate change, natural dispersal, deliberate releases and farm escapes. Analysis estimates that even under conservative assumptions, if no significant management action is taken, by 2050 there could be 1.7 to 4.6 million feral deer in Victoria.

Victoria is in many ways the centre of the national infestation of deer and will act as a key reservoir for national expansion if there is not significant action. Victoria remains the only mainland state to continue to protect deer as game species.



Picture 1. Cool Temperate Rainforest, Dandenong Ranges National Park. Photo. Meghan Lindsey

Goals and Vision

VNPA supports the goals presented in the Draft document, and the following principles being adopted in the final National Feral Deer Action Plan:

- Feral deer are a pest and should be treated as such on all tenures, except on approved deer farms.
- Federal, state and territory governments have a responsibility to fund the outcomes under this plan.
- All land managers in areas where feral deer are present have a responsibility to be involved in feral deer control programs.
- The focus of management efforts should be on eradication of isolated, satellite populations, protection of key environmental assets currently impacted and stopping the spread to new regions.

We have outlined some additional suggestions below.

1. Stop the spread of large feral deer populations and reduce their impact.

The creation of a national feral deer containment buffer zone is a sound idea. However, in the case of Victoria it would see deer spread further and could work against many regional and state plans to eradicate outlying deer populations.

We believe that *Zone 2: National containment buffer zone* should be smaller, as in the draft document almost half of Victoria is within the containment area. The on-ground reality is that the deer populations in the north & west of the state are small and should be targeted for eradication due to the populations' small sizes, lack of native vegetation, high levels of significant vegetation communities and species including many endemic species only found in Victoria but not listed federally. (see figure below extracted from the national action plan)

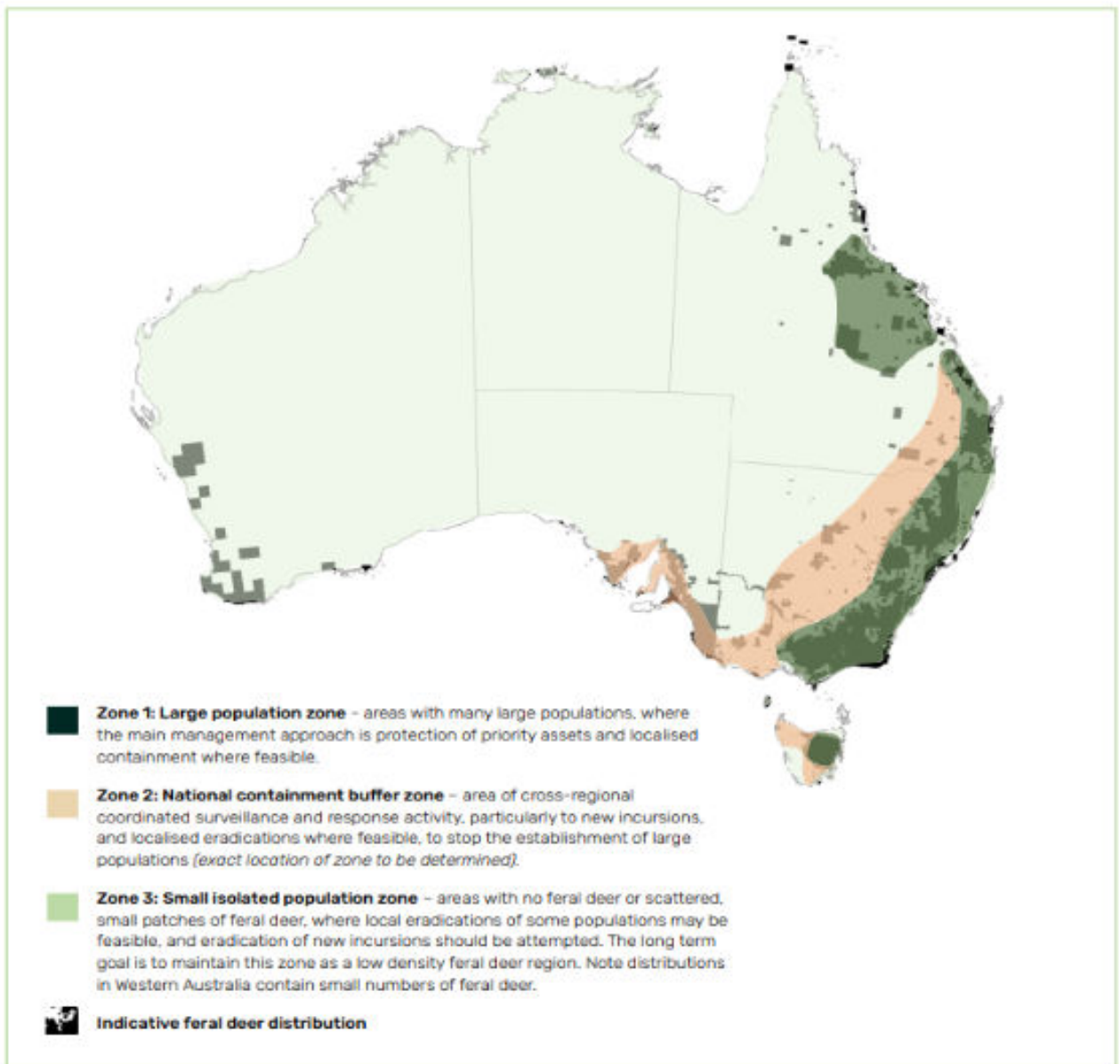


Figure 5. Distributions of feral deer are concentrated to different degrees in 3 zones across Australia

2. Control (drive down densities as far as possible) or eradicate small, isolated populations before they spread.

Victoria is the most cleared state in Australia, with many areas of bush disconnected from each other. We support the goal of eradicating small populations within and beyond the containment zone and reducing the impacts of feral deer on peri-urban areas. Eradication must include populations outside and within the draft containment zone, which are island or disconnected for larger landscapes.

3. Protect significant sites from impacts from feral deer (threatened species, ecological communities and places of national and international cultural or environmental significance).

There seem to be disconnect in some of the priority mapping used in the national plan. While six Victorian RAMSAR sites are listed as overlapping with deer distribution, a number have been missed including:

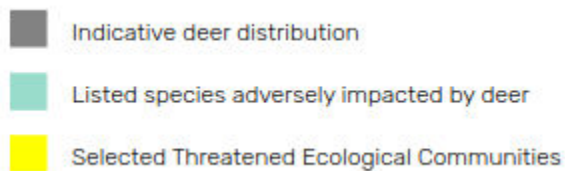
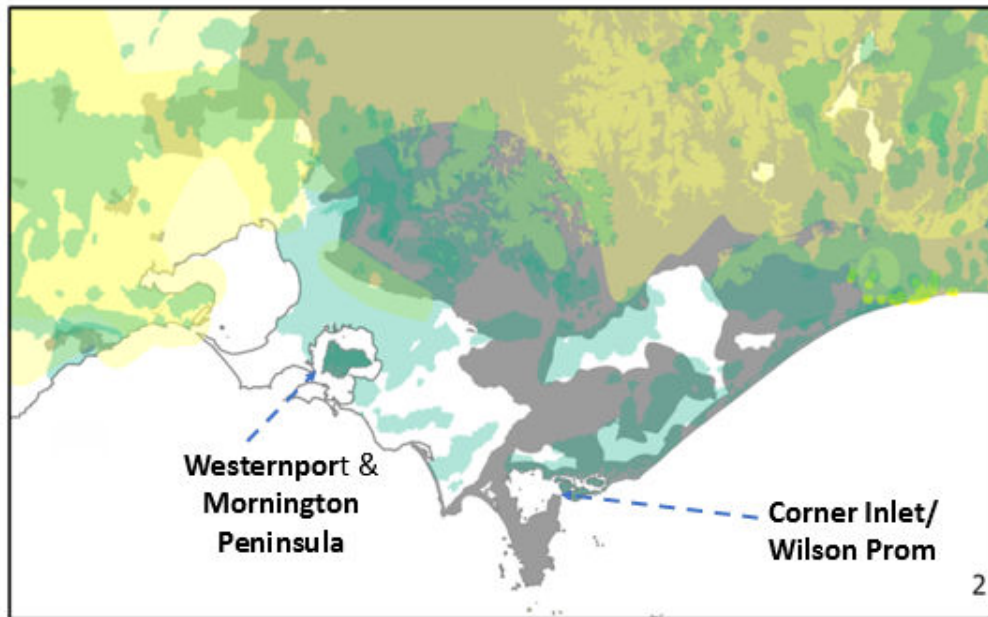
- Corner Inlet
- Port Phillip Bay and Bellarine Peninsula
- Western Port Bay
- Glenelg Estuary and Discovery Bay Ramsar Site
- Hattah-Kulkyne Lakes
- Lake Albacutya

Areas such as around Corner Inlet, Port Phillip Bay, Bellarine Peninsula, Western Port Bay, Glenelg Estuary and Discovery Bay Ramsar Site are clearly within deer distribution areas, and are also in areas identified as impacting on either nationally threatened species or ecological communities. Areas around Corner Inlet, such as Wilson Promontory National Park, Corner Inlet Marine National Park and Nooramunga Marine & Coastal Park, are well know for infestation of Hog deer, in particular.

Hattah-Kulkyne Lakes and Lake Albacutya are further north and would be considered in containment zone 3, but should be prioritised for elimination. Deer have been reported as far north as the Sunset Country.

In eastern Victoria areas such as Wilsons Promontory, Corner Inlet, Nooramunga Marine & Coastal Park, Western Port Bay islands and the Mornington Peninsula should be in the eradication and prevention zone (see below, map from page 17, figure 7 from National Action Plan). Deer and deer damage have been documented in the Western Port Woodlands adjacent to Western Port Bay.

While some of these RAMSAR sites appear on the map on page 15, Figure 6, it is unclear why certain RAMSAR areas have been selected or listed over others in Appendix 5 of the plan.



A finer scale analysis of some ecosystems should also be considered. For example, as discussed in detail in our 2018 Submission to the Draft Victorian Deer Strategy:

- Rainforests (including littoral rainforests, dry rainforests, and a range of cool temperate and warm temperate rainforests) scattered in hundreds of highly vulnerable sites throughout eastern and south-western Victoria, cannot be adequately protected unless deer population numbers are greatly reduced throughout the state. Many of these vegetation communities were also impacted by 2019 landscape scale fires.
- Specific Areas which require dedicated action include Cool Temperate Rainforest in the Dandenong Ranges, a Flora and Fauna Guarantee-listed community heavily impacted by deer. <https://vnpa.org.au/deer-in-the-suburbs/>
- Pressure on highly vulnerable areas such as the alpine/sub-alpine regions will remain expensive to manage in the long-term while they are surrounded by high deer populations at lower elevations.
- Many other Ecological Vegetation Classes (EVCs) are threatened by deer.

We would like to see goal 3 expanded to include species and ecosystems of state significance those listed under the state's threatened species legislation (for example, here in Victoria the *Flora and Fauna Guarantee Act 1988*). There are around 2000 threatened species and communities in Victoria, 556 (29%) of these are considered critically endangered. We believe the expansion of goal 3 will help those seeking to plan a deer control operations across the country and make sure the plans include state specific species and ecosystems of significance.



Picture 2. Deer road kill in the Dandenong Ranges. Photo: Jordan Crook

Approach to achieve goals

VNPA supports most of the approaches to archiving the goals that are outlined in the draft document, but holds some concerns about the *national coordination and collaboration* approach that may see local areas for eradication overlooked, as well as impact on state listed ecosystems and species not used within priotisation frameworks for works.

We would also like to see support for research and development into deer aggregators, trapping and possible biocontrol as means of control of feral deer population shown in the report.

We thoroughly support state reporting on performance under the National Feral Deer Action Plan to the National Feral Deer Action Plan Implementation Committee (NFDAPIC), a region by region approach would be advantageous, including, if possible, a summary on the amount of deer removed through each deer culling programs on annual basis.

Importantly, the expected outcomes for the plan need to be more ambitious, with clear interim targets including:

- Within one year, all States and Territories should have in place arrangements to implement the National Feral Deer Action Plan, including allocating dedicated funding for implementation.
- Within one year, feral deer management plans should be developed for key environmental assets of national significance the Australian Alps and relevant RAMSAR sites.
- Within five years coordinated landscape scale management should be in place where land owners, land managers, government and community are demonstrably working together.

There should be consistent laws and regulations across all states and territories that:

- Recognise feral deer as a pest animal and treat them as such.

- Establish a clear responsibility for all landholders and managers to be involved in feral deer control programs.
- Set clear penalties to stop the wilful or negligent release of feral deer.
- Prevent new deer farms in areas where no feral deer are present and phase out all deer farms in the eradication and prevention zone.
- Enable enforcement of compliance, including on government land.

For more information about this submission please contact
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