



STOP PROTECTING FERAL DEER

An open letter to

The Hon. Steve Dimopoulos
Minister for Environment
Minister for Outdoor Recreation
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The Hon. Ros Spence
Minister for Agriculture
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Dear Ministers Dimopoulos and Spence,

We are writing to you in your roles as key Ministers in the Victorian Government responsible for managing our precious natural resources and biodiversity.

STOP PROTECTING FERAL DEER

A few deer released 150 years ago for game have now become a large uncontained and uncontrolled feral population. Feral deer must be removed from the *Wildlife Act 1975* to enable them to be dealt with as an established pest animal, no longer a game animal.

We strongly urge you to take the opportunity to amend both the *Wildlife Act 1975* while it is under statutory review, and subsequently recognise all feral deer as established pest species under the *Catchment and Land Protection Act 1994*. This would align these Acts with the purposes of Victoria's *National Parks Act 1975* and *Flora and Fauna Guarantee Act 1998*, the federal *Environment Protection and Biodiversity Conservation Act 1999*, and Victoria's biodiversity strategy: *Protecting Victoria's Environment – Biodiversity 2037*.

FERAL DEER ARE A SERIOUS THREAT TO NATURE, THE ECONOMY AND PUBLIC SAFETY

Hundreds of thousands of feral deer now occupy nearly 40% of the state of Victoria. The alarming spread of feral deer across Victoria over the last 40 years can be seen here: [Feral deer spread](#). As well as having a serious impact on biodiversity, two recent economic impact studies show that if action is not taken the cost of the impact of feral deer to biodiversity, agriculture, forestry, public safety and the enjoyment of nature will be up to \$1.1 billion over the next 20 years¹ and up to \$2.2 billion over the next 30 years².

1. An economic analysis of the impacts of deer in Victoria. Terry Walshe, Casey Visintin, Dave Ramsey, Tom Kompas and Brendan Wintle. School of Biosciences, University of Melbourne and Arthur Rylah Institute

2. Counting the Doe: An analysis of the economic, social & environmental cost of feral deer in Victoria. Frontier Economics.

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According to Melbourne University¹, the greatest losses will be impacts on biodiversity with 469 species exposed to additional extinction risk as a consequence of deer in the landscape.

Sadly, feral deer have now invaded our most important natural areas, trashing and trampling almost all of Victoria's natural areas and parks from the coast to the high country; Wilsons Promontory to Victoria's highest peak, Mount Bogong. The impacts of feral deer disrupt the overall viability and function of fragile ecosystems such as Alpine Wetlands, Littoral Rainforest and Coastal Vine Thickets and Cool Temperate Rainforest, listed as threatened under State and Commonwealth law. The ecosystems of Australia have evolved in the absence of any heavy hard-hoofed animals and the consequences are catastrophic for most native ecosystems.

Farmers are losing productivity and forced to build expensive fences; plantation forestry vital now to timber supplies is losing production; gardens are being trashed and worryingly, road accidents involving feral deer are becoming more common. Ecological restoration projects are being damaged and threatened by deer browsing.

Nationally, a recent study³ found that the cost of feral deer to agriculture is \$69 million annually. Frontier Economics⁴ found that over the next 30 years the losses in agriculture in Victoria due to feral deer impacts will be up to \$500 million. Declaring deer a pest would hardly be a burden for farmers any more than for declared pests such as feral pigs, foxes or rabbits. Should landowners and managers invest collaboratively in deer control, controlling deer will bring a significant return on investment. It is in everyone's interest to learn from each other and work together to control pests.

PROTECTING FERAL DEER IS A LEGACY OF OUTDATED GAME MANAGEMENT PRACTICES

While the feral deer population has grown and spread rapidly, they remain protected under Victoria's *Wildlife Act 1975*. This hangover from the past, when small numbers of deer were being protected for the game hunter, is no longer justifiable. The vast number and spread of feral deer have now gone well beyond what might have once been thought of as wild game for hunters and hardly need protecting for that purpose. Protecting feral deer in Victoria is in contrast to every other mainland state where they are recognised as a pest species and managed as such.

WHAT ABOUT DEER HUNTING?

Removing the protected status of deer is unlikely to have any impact on deer hunting opportunities, community safety or animal welfare in Victoria, as has clearly shown to be the case in other mainland states where they are not protected.

Current regulation of deer hunting in Victoria's *Wildlife (Game) Regulations 2012* is largely related to game management and protecting the 'fair chase and challenge of the hunt'. There is currently no test or accreditation needed to obtain a game licence endorsed to hunt deer, other than for hunting with hounds. Deer hunting can be managed in the same way hunting is now regulated for other vertebrate pest animals with existing controls including the *Firearms Act 1996* and Regulations, the *Protection of Cruelty to Animals Act 1986* and Regulations and the Code of Practice for the Welfare of Animals in Hunting. There is no need to protect deer simply to control hunter behaviour.

Deer hunters will continue to help to reduce the numbers of feral deer as part of properly planned activities but, importantly, along with professional pest control programs.

NOW IS THE TIME TO ACT

The statutory review of Victoria's *Wildlife Act 1975* commenced in 2021 with extensive community consultation undertaken by an expert advisory panel. It is now over two years since the panel's consultation summary was published and the panel's final report and recommendations were provided to the government.

3. McLeod, R. (2023). Annual Costs of Feral Deer in Australia. Report prepared by eSYS Development Pty Ltd, Centre for Invasive Species Solutions, Canberra.

4. Counting the Doe: An analysis of the economic, social & environmental cost of feral deer in Victoria. Frontier Economics.

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Many members of the general public, conservation and Landcare groups, farmers and agricultural representatives and Traditional Owners groups made meaningful and important submissions to the process.

The Victorian Government has still yet to publish the recommendations from the panel or its response to those recommendations.

We believe strongly that the protected status of feral deer creates both social licence and public policy confusion and uncertainty for control, irrespective of bureaucratic work-arounds put in place, such as limited and short term unprotection orders for private property owners.

On one hand, the Victorian Government is investing in the control of feral deer to protect biodiversity (which we welcome), while on the other the government is protecting feral deer to please a small group of people that consider deer to be intrinsic to the natural landscape.

Being declared an established pest animal will make the position on feral deer in Victoria much clearer for the community and land managers and reflect reality as we move to seriously control the impact of what has become a serious pest.

SIGNED

NATIONAL ORGANISATIONS

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ACADEMICS

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<p>Patrick O'Connor Associate Professor Economics and Public Policy University of Adelaide</p>	<p>Professor Gretta Pecl AM Biodiversity Councillor and Professor University of Tasmania</p>	<p>Professor Emerita Lesley Hughes (Hon FRSB) Pro-Chancellor Macquarie University</p>

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LAND HOLDERS AND MANAGERS

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Tahlia Cruise

Committee member
Main Creek Landcare
& a Ranger at Capel Sound Foreshores

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Bronwyn and Peter Lowe

Land owners
Jamieson

Doug Osborn

Conservation volunteer

Adam Dumicich

Impacted Land Holder

Sally Sheppard

Land owner and timber plantation owner

Eric Smith

Land owner and timber plantation owner

Alexandra Larkey & Daniel Larkey

Rural land owners, farmers & concerned citizen
Taggerty

Stuart Inchley & Victoria Johnson

Trust for Nature covenant land owners
Turtons Creek

Tom Guthrie

Land owner (sheep and grapes) bordering Grampians (Gariwerd) NP
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Metung

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Concerned citizen
Bollarto

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Land owner

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Concerned citizen and land owner

Bruce Boxshall

Land owner

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Concerned citizen

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Concerned Landcarer

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