

Submission to Senate Inquiry into Feral Deer, Feral Pigs and Feral Goats.

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1. Who we are

A group supported by twenty plus landholders, with representatives from the Tallangatta Valley Landcare Group and Tallangatta Victorian Farmers Federation asks that the following points be recorded, embraced and actioned following the Senate Inquiry into Feral deer, Feral pigs and Feral goats. The members of this Group are able to comment on feral deer, as we have all had problems on our land regarding the escalating numbers of feral deer;-

2. General suggestions for a National approach to feral deer

Deer must be declared a feral pest species, across all of Australia.

- a. The declaration of feral deer, a NON-NATIVE, INTRODUCED, population out of control, invasive species being formally declared a pest species, need not preclude recreational hunters from the pursuit of the species.
- b. Feral deer DO NOT NEED MANAGING FOR SUSTAINABLE HUNTING THEY NEED EXTERMINATION, as far as is practically possible.
- c. With adequate legislative changes, both professional/commercial hunters and recreational hunters need MOINTORED, REGULATED and CONTROLLED access to State and National Parks, for feral deer (+ other feral species) culling and control.
- d. The classification of destructive feral deer as a 'game species' and the protection thus afforded them from elimination, needs the strong arm of the Commonwealth to overrule and help these recalcitrant States accept their responsibility for extermination, not just of feral deer, but for more rigorous efforts to exterminate all feral animals from the Australian bush. It is pure political hyperbole and spin, for State Governments to abdicate their responsibility in dealing with feral pests and invasive species. No one would agree to rabbits and/or foxes be taken off the pest

species lists just because they cannot be totally eliminated. Just because a pest species cannot be totally eliminated does not mean that their destruction should not be taken less seriously or ignored!!

- e. To call deer a 'game' species is a misnomer, they are a destructive, invasive feral pest species that are multiplying out of control. The States are not meeting their legislative requirements in National Parks, nor their own State Legislation. For example, in Victoria the Flora and Fauna Guarantee Act of 1988, has sambar deer listed as a 'potentially threatening process'. The State is doing little to control any deer across most of its jurisdiction.
- f. Feral deer are a significant threat to the Australian environment and for us, the Victorian bushland environment, in particular. As noted in the Victorian Draft **(Feral)** Deer Management Strategy (*sic*) over 1000 species are potentially threatened. A significant decline in over 1000 species of flora and fauna¹ from the overall Australian bushland and Victorian, in particular, environmental food webs will have severe and long-lasting effects on not just the Victorian environment, it's biodiversity and it's hydrological patterns, but ALL, as all environmental communities are linked. As these, 1000+, species are removed and the food chains they are part of, broken, ecosystem collapse ensues. Feral deer will move to other species (they are known to be adaptive herbivores²) and species loss will spiral out of control. Should bushland species continue to remain totally unpalatable, then the deer will further move out into farmland, and increase the myriad of problems farmers face with feral deer and the host of other feral, non-native, introduced pest species.
- g. Feral deer are leading to losses in agriculture that amount to millions and millions and millions of dollars, as the number of ALL species of feral deer continue to grow. In Victoria the State is proposing 'Management Zones. Most of the Victorian bush will likely be classified in the, 'low priority zone', as will most of the production agricultural land and extensive grazing lands. The losses in agriculture, particularly for those whose properties adjoin bush, will continue to mount exponentially. Not just loss of production, but losses due to the host of problems associated with legal and illegal hunters³, social and personal stresses etc..
- h. Some years ago, grazing of cattle in the high country was stopped and cattle moved out, on a basis of environmental and conservation concerns. A small number of

¹ There are still hundreds of species of native bees, wasps and moths of which little is known. The variety of creatures in these faunal groups reflects the huge variety of vegetation communities and habitats across the variety of climate zones, soil types, geographical features etc in Australia. The destruction of various specific plant communities, means the loss of the very specific niche fauna which rely on that group. Vegetation loss, for any reason, across Australia, risks loss of both flora and faunal species of which NOTHING is known!!!

² Greg Baxter personal communication. Greg Baxter was previously associated with the School of Agriculture and Food Sciences, The University of Queensland and authored, 'Deer in Australia'. A Presentation to the Victorian Blackberry Taskforce, Whittlesea, May 18th, 2018

³ One local land holder describes illegal hunters as akin to 'armed home invaders'. A farm is a farmer's home. Yea, for passionate farmer's, their land is akin to their soul, and what affects their land, affects them! Hence the very deep concerns this group of farmers have, not just for their agricultural losses, but for the greater environment, which they are seeing being destroyed by feral animals. They care about leaving a legacy for future generations that they can be proud of, but are very disheartened to see their efforts hijacked by the political process that should be seeking to save the land not destroy it.

cattle have now been replaced by ever growing, never to plateau⁴, numbers of feral deer who are having a greater and ever increasing catastrophic environmental effect!!

As farmers and land managers we find this somewhat strange and incomprehensible.

3. Professional/Commercial hunting suggestions

We believe that, in the first instance, the expansion of the commercial and professional hunting sector, with strictly regulated and monitored access to hunting in State and National Parks, may be a partial answer and, go some way in helping, at best to contain or limit the growth of, the feral deer population. Feral pigs, goats, horses, camels, donkeys and buffalo could also be targeted, as appropriate.

- a. Additionally, professional and commercially hunted feral animal carcasses need to be sold and traded within both the pet food and as deemed acceptable, human consumption food chains. Putting serious commercial value on feral animals, in the human food chain, is part of the answer to reducing losses in agriculture and saving the environment.

4. Scientific research suggestions

Governments across Australia and the CSIRO need to work together, on serious scientific research into how best cull and eliminate feral species, deer, pigs, and goats (+ horses!!) from the environment. Research foci on interrupting mating (eg venereal disease perhaps), targeted baiting or poisoning, highly organized snaring and trapping etc may be options. We all agree that we don't want a wholesale poisoning program like NZ implemented and its lasting ramifications.

5. Recreational hunting suggestions

We believe that the safety of the general public from hunters must be improved. This is imperative as recreational hunters access PUBLIC land. Allowing both recreational and professional/commercial hunters to access MORE PUBLIC LAND cannot and should not occur without monitoring, control, regulation and location tracking.

- a. All hunting regulatory experiences and requirements need to be the same, across ALL States. No more of this 'easier to go to Victoria and hunt because the NSW requirements are more stringent' quote, end quote, from hunters who live in NSW and come to Victoria!!
- b. ALL hunters must be required to log their hunts, their personal firearms, vehicle registrations and other details, to gain access to specified areas for specified time periods and be required to be under GPS surveillance at all times.
- c. Any system that is set up needs to be transparent and give access to various hunting 'parties' in different places, to avoid and limit the current corruption of the NSW system that sees, particular groups access the best areas all of the time!!
- d. The general public could be made aware of hunter locations through GPS and mobile apps, with various State and National Parks open to hunters for parts of the

⁴ Greg Baxter personal communication

year and the general public accessing different parks for parts of the year. The two user groups are largely mutually exclusive, but with modern technology these difficulties may be overcome.

6. Some negative impacts regarding agriculture

This group of farmers and land managers is extremely affronted and disappointed at the almost total lack of acknowledgement and the vast underplay of the losses in agriculture and the other identified negative impacts of feral deer (and other feral pests)

- a. The Victorian Draft (**Feral**) Deer Strategy acknowledges that there is no hard evidence but only 'anecdotal' evidence of feral deer competing with stock. How then may any Government or Government agency, advocate for the interests of recreational hunting over the unknown losses in all the other sectors of the community, including losses related to disease vectorship, peri-urban inconveniences, cultural heritage destruction and the plethora of issues surrounding illegal hunting?? The States and the Commonwealth needs to get some real, unbiased science happening if they want to make sensible (not political!!) decisions about feral deer management (sic).
- b. As Victorians we are seriously annoyed that there was no attempt to estimate the costs of the potential initial loss of over 1000 species of flora and fauna (and thus possible virtual demise of the bush under-storey and then loss of bushland), the losses in agriculture, the potential for disease spread, peri-urban safety and cultural heritage, by the Victorian Government. It seems by implication that, in Victoria, the spurious \$142 million allegedly spent by 37,000 hunters is accounted as of more value than the losses due to negative impacts of feral deer, because the Victorian Draft Management Strategy does not seriously aim to significantly reduce feral deer populations across ALL of the State. The unmeasured potential losses of habitats, flora and faunal species across the whole of Australia must be at least 4-5 times the Victorian average. This is truly disgusting!!! How can Governments allow this to happen?? Stand up and be proud political system, Australia is noted amongst developed countries for its rate of species loss!!! [this is sarcasm, in case you missed the point]

7. Comment on negative impacts

a. BIODIVERSITY

Australia is one of the world's leaders of species loss. The loss of under-storey from browsing⁵ feral deer, the ringbarking of large stands of existing eucalyptus that are

⁵ Browsing means that the bushland species have reduced flowering and thus seed set and thus regeneration. The continued nibbling of the green growing tips, which are often the sweetest, means that the plant cannot replace lost tips/branches and slowly becomes smaller, as the root mass reduces too, and eventually dies. Any new plants are browsed as tender young plants and so the plant cannot reproduce either. Loss of plant means loss of insects, birds, small mammals, reptiles etc.. that utilize that plant as part of their feeding/habitat niche ['As above, so below' – a big plant has a big root system, a small plant has a small root system]

already now dying⁶, destruction and loss of bush under-storey, over grazing of native grasses and forbs, the wallowing in bogs and subsequent loss of alpine, aquatic and wetland species, and loss/demise/partial destruction of at least 11 ecological communities, cannot be redressed, in Victoria, by recreational hunters shooting 100,000 or even 200,000⁷ deer per year. Assuming that Victoria is typical of the rest of Australia, environmental loss and degradation due to destructive feral animals across the whole continent (combined with land clearing, urban growth and climate change), must be astronomical!! Our natural environment is the, 'lungs' of the Country, producing oxygen and sinking carbon, and we continue to abuse it at an unprecedented rate, on unprecedented scale, at our peril!!

Consider for a moment, the last European movie that you viewed. Think about the forest scenes. What did you notice? What do you remember? Where there lots of bird and mammal species? European bush is largely open, with little under-storey. The annuals of history in these countries tell of long-gone species and acknowledge that the forests have changed!!Deer, the insatiable, herbivic, grazer and bowser!! Australia is headed down the same path!!! And interestingly many European countries employ 'game wardens' to keep dear populations under control (in conjunction with hunters) TO PRESERVE THE CURRENT INTERGRITY OF THEIR FORESTS!!!

b. AGRICULTURE

As a group of mature and experienced land managers we are going to make some CONSERVATIVE estimates of our losses:-

ASSUMPTIONS:-	
1.	Potential profit/DSE from cattle or sheep =\$80/year
2.	1 mature breeding Samba deer/stag = 5 DSE/year
3.	50 feral deer per km of bush/pasture transition zone
4.	Average Tallangatta Valley farmer has greater than 2 km of private pasture that is adjoined to public bush

Calculation:-

\$80 / DSE ⁸	80	
x		
5 DSE / feral deer	5	\$400 ⁹ per feral deer

⁶ This is particularly obvious with soft barked trees such as Manna Gum. One farmer reported that there is an area of youngish to a foot in circumference, trees, trashed by deer and now dying.

⁷ We, as land managers, do not want twice as many incursions onto our private property, that we are running our business on, by recreational hunters, (illegal armed entry!!) trying to double the numbers they shoot!!! We already have enough problems thank you very much!!!

⁸ 1 DSE is the amount of grass that 1 adult wether (castrated male sheep/non-lactating sheep) needs to eat in one year to maintain its weight. So we estimate that 1 mature deer eats as much as 5 sheep! [The Sheep Farmer believed 7!! But we went with 5 to keep the estimation conservative]

⁹ One wether sheep sells for around \$100, allowing for cost of production at \$20 = \$80 profit/wether So if 1 deer = 5 wethers of grass eaten and 1 wether makes \$80, 1 deer = 5 x \$80 = \$400 worth of grass eaten by 1 deer.

x		
50 feral deer / km ¹⁰	50	\$20,000 / km
x		
2 km (min) average farm	2	\$40,000 minimum loss of profit for average farm

Tallangatta Valley¹¹, is over 35 km long with an estimated pasture/bush transition zone of WELL in excess of 100¹² km and approximately 50 farms. The MINIMUM, the CONSERVATIVE loss due to feral deer predation of pastures experienced by this community exceeds \$2,000,000 every year at the current feral deer population of 1,000,000!!

- And Tallangatta Valley is just one small valley, amongst many, that comprise the foothills, all along the Great Dividing Range, in North East Victoria. Locally, consider Bullioh, Corryong, Bigga, Lucyvale, Cudgewa, Bethanga, Talgarno, Granya, Sandy Creek, Mitta Valley, further a field; Kiewa Valley, the Wangaratta areas, King Valley, the Bright, Myrtleford and Mansfield areas, Yea, the Yarra Ranges etc.. and then all of Gippsland; west, east and south. The grass losses ALONE soon amount to much, much more than \$142million of DISCRETIONAL spending by Victorian, recreational hunters, who would most likely spend their money on other hobbies, sports or pursuits.
- Consider now the above scenario, repeated throughout this vast Country, in the mountains, hills and on the plains the losses defy calculation!! And our estimations were just for the feral pest of which we are familiar; feral deer.....
- And remember, our calculation was just the loss for grass growing and takes no account of the many other losses that occur in dealing with the problems and issues associated with trespassers, illegal hunters, stock shot, gates ripped off, lost production (weight gain in cattle/stock) due to hunters, their dogs and firearms, time spent attending to wounded and dead stock and abandoned deer carcasses, fixing fences and farm access tracks, the expenses of additional fencing, stock replacement, stress and fear from unknown trespassers who with night vision technology cannot be seen trespassing, costs of additional

¹⁰ One farmer reported over 180 shot this year by professional and recreational hunters on their property. Another reported more than 40 shot by professional hunters in less than 3 months, another over 80 viewed with night vision technology in 150acres. Another farmer reported that one of his back paddocks, close to the bush was 'covered' in feral deer faeces.

¹¹ Tallangatta Valley is surrounded on three sides, on the hill tops/ high ridges, by public/State forest. The farming land is largely in the bottom of the valley. Many farmers have some private bush which adjoins public bush. A typical land use profile/transect would be:- Tallangatta Creek (in the bottom of the "V"), private pasture land, private bush (generally more open/less understory than public bush due to cattle grazing), public bush. Deer tend to 'bed down' in bush during the day and come out and graze on pasture land at night. The public bush acts as a nursery/breeding ground for feral deer. As professional shooters are shooting on private pasture land, the numbers they are seeing has not substantially declined, as the feral deer keep flowing from the bush to the pasture land. This will be more pronounced as the feral deer numbers increase. During the dry summer, the bush will not be able to sustain, the existing populations and the deer will move out onto farms in search of both feed and water.

¹² In reality, the pasture/bush transition zone is more likely to be 150km if whole of the Valley with its Tallangatta Creek tributaries forms the base of the calculation, however we have taken a very conservative figure. As feral deer populations continue to grow, and feral deer move out to graze more pasture, as they kill off the bush understorey, agricultural losses will continue to increase. If 150km of bush line is used to calculate loss due to pasture predation, by feral deer the loss is \$3,000,000/year.

fodder to replace pasture eaten by feral deer¹³, threats to personal property¹⁴ and theft!!
etc... etc...

OUR QUESTION IS:- How is the Commonwealth Government going to deal with the national problem that poses the potential of total ecological Australian bushland collapse, in the long term, and that is contributing to ever increasing, significant to losses in agriculture??? **A problem that States are not really addressing seriously and that some are ignorantly cossetting along!!**

It has been estimated that the feral deer population doubles every 3-4 years. Removal of around 40-50% of the population would likely maintain the population at current levels the growth. Removal of greater than 50% may slowly reduce the numbers.¹⁵ In 2017 Recreational hunters 'harvested' 106,000¹⁶ feral deer, in Victoria, last year, that is not enough to have any (**ANY, ANY**) impact on the feral deer population. The feral deer population will continue to increase and problems multiply profoundly while States favor 'sustainable hunting' and/or serious control occurs only in a few small priority areas with the rest of State's jurisdictions, left for unilateral feral deer population explosion!!

c. DISEASE VECTORS

Feral Deer carry a number of diseases, and in conjunction with foxes and feral dogs are disease vectors. A number of farmers, in our area, have had cows aborting and sustained substantial losses due to the *neo spora konidia virus*, which is carried and spread by feral deer. The potential for feral deer to carry pesti virus, foot and mouth etc.. is also very real. While we appreciate the sensitivity of the biosecurity issues regarding feral species and their role as disease vectors to the export market arena, to fail to mention this delicate subject, would reflect poorly on the serious issues surrounding feral animals in the environment and their relationships to export earnings. Not speaking of a problem or ignoring it, tends to make a problem worse, not better!

d. PERI-URBAN

The Victorian Draft (**Feral**) Deer Management (*sic*) Strategy, commented on the issue of road safety in the peri-urban area only. Accidents involving feral deer are common in

¹³ One local farmer testified that he now spent \$10,000/year buying in fodder to replace SOME of the pasture reduced by deer. He has still reduced his numbers by around 20. He has a small farm, and this is a significant loss. In fact to assist in overcoming these economic losses, he is now renting some additional land! Another farmer is considering moving from 'best practice' 'rotational grazing' (this maximises grass production and minimizes soil compaction) to 'set stocking', so that his cattle will 'compete' more directly with the feral deer. Feral deer tend not to come out to graze as much on pasture that is already short!! A number of farmers are reporting that they get very little pasture production off the back paddocks that are largely surrounded by bush, particularly over winter, when grass growth is slow and the feral deer eat it as fast as it grows.

¹⁴ A landholder in the Corryong area who challenged illegal hunters was threatened with return in summer with the 'red steer' – a euphemism for fire, the hunters threatened to return in summer and burn his property!!! They also threatened to shoot his stock if he prevented their access.

¹⁵ Information from Wild Game Resources Australia (WGRA), the major private company that harvests, amongst other animals' feral deer and has been doing so for in excess of 20 years in Qld and NSW. These figures were stated at a Public Landcare meeting, Corryong, August, 2018. WGRA hunters have considerable on the ground intelligence and experience and their estimations should be respected. [WGRA has hunters on the ground observing and experiencing [at night!!], when the feral deer are out and grazing!!] what is really happening!!

¹⁶ It would be interesting to know what proportion of the 106,000 'harvested' were 'harvested' on private land.

rural areas too and the Victorian Draft Management Strategy does not acknowledge this. One local community member has hit 2 feral deer in the last 18 months!

Why is peri-urban small acreage/hobby farming considered more important than production agriculture in rural and regional Victoria? Are other States guilty of promulgating the great metropolitan rural divide, where responsibilities halt at city boundaries??

Why is peri-urban infrastructure and why are peri-urban back yards considered more important than infrastructure in regional and rural Australia and regional/rural back yards.?? Why are some Australians considered more worthy than others?? In fact, why are consumers considered more important than producers???? Surely the ones who produce the food and fiber, **the ones who earn the export dollars** are as equally important as the ones who consume???

e. ILLEGAL HUNTING

Without any intention to underrate the myriad of issues associated with illegal hunting, for the sake of brevity, we will not restate them. Notwithstanding, some of the main ones are mentioned in bullet point 2 in 5 b. Agriculture.

While we support initiatives to clamp down on illegal hunting, two vital comments need to be made:-

Policing is woefully inadequate and needs much greater resources allocated to combat illegal hunting and illegal hunting practices. Additionally, fines for trespassing, illegal hunting, hunting and fire-arm infringements etc. need to be increased and the number of successful prosecutions, with loss of licenses, fire arms and vehicles within in the judicial system, needs to increase and receive adequate publicity. The fines and penalties need to be consistent across the States.

Additionally, there should be co-operation between the States, so that those who do the wrong thing in one State, and are prosecuted, don't just move to another and re- gain access to hunting licenses and firearms!!

The admission, on radio, of former Victorian Game Management Authority Compliance Officer, that resourcing for compliance and prosecutions was inadequate and virtually totally lacking, raises the concerns regarding the potential success of any efforts to curtail illegal hunting, in Victoria, in particular. It is expected that this lack of compliance policing by the State's hunting authority/departments would be similar across other States as well, certainly, at least amongst those who list feral deer as a 'game' species.

The Victorian draft strategy does not outline how issues of lack of responsibility, trespassing, and law breaking amongst recreational hunters will be addressed, resourced and implemented. Educating recreational hunters to the rules, no more ensures they will abide by them than dressing-up mutton as lamb, makes it lamb!!! The same must be said of a National approach. Educating hunters dose not ensure compliance or responsible hunting. Any National approach to reigning in illegal hunting, will need to be very specific on how it will address the issues, whether by inducements or punishment!

8. Implementation

How the Commonwealth will move past recommendations to the States, to actually get them to act is unknown to us, but it will be vital, if the environment is to be saved and losses in agriculture reduced. In Victoria, it seems that agricultural and environmental voices have been drowned out at all levels of policy making to date. The implementation of the Victorian Draft (**FERAL**) Deer Management (*sic*) Strategy, includes four pro-deer (five, counting the Game Management Authority) groups and a number of Government Departments¹⁷. There no private environmental or agricultural groups included in the list, except for the word 'community'. How can the silent voices of agriculture and the environment ever be heard against these seemingly political interests??? While a 'a partnership approach' is championed in Victoria, it appears that only some partners welcome. In Victoria, to date the Department which contains Agriculture, does not seem to have represented land manager/farmer interests very well. We can only hope that at a Commonwealth level this will not be the case!!

9. Concluding statement

Australia faces a 'silent spring', not just from pollution, climate change, land clearing, urban encroachment and overpopulation, but from the combined ravages of out of control feral deer, feral pigs, feral goats and feral horses, feral cats, feral dogs, feral camels, feral donkeys, feral buffalo, rabbits, foxes, minors, mosquito fish, carp, cane toads, fire ants etc etc.... We ignore the demise of our environment at our peril!!

Thanking you

A consortium of Concerned Tallangatta Valley residents, land managers, landcarers and farmers

¹⁷ Government Departments are required to reflect the voice of the Parliament of the day and are under its directives and funding. When political expediency, as dictated by votes on the 'cross-benches' dominates decision making, and maintaining power takes precedence over sensible, environmentally based, long term decision making, sensible sustainable outcomes for future generations are unlikely!!