



11/04/2019

The Hon Jaclyn Symes MP
The Hon Lilian D'Ambrosio MP
Cc:



Dear Ministers,

We have been forwarded a letter (attached FYI) from the Victorian National Parks Association (VNPA) which seeks to undermine the finalisation of the Draft Victorian Deer Management Strategy.

We advocated for this strategy for a number of years and were delighted when it was funded under the Sustainable Hunting Action Plan.

The VNPA have forwarded their letter to a number of other environment groups, academics and “notable people” asking for their support.

It was passed on to us by an academic who will not be supporting the letter and who is concerned at the numerous inaccuracies, emotive statements and exaggerations in the letter and at its focus on demonising the animals rather than driving workable solutions.

Beyond the hyped rhetoric of the letters introduction, of particular concern are the following specific recommendations in the letter:

“Amend both the Wildlife Act (1975) and the Catchment and Land Protection Act (1994) to recognise all deer as pest species. This would align these Acts with 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.”

The draft strategy explores the question of the status of deer in some detail:

“This matter was investigated by the Environment, Natural Resources and Regional Development Committee of Parliament in 2017. The Committee found the game classification, and the exemption that allows the destruction of deer on private land, does not restrict the ability of landowners and land managers from controlling deer. Indeed, a wider range of management outcomes can be achieved by managing the established species as game, than can be achieved under a pest status.



The classification of game deer as a pest would place a legal requirement on land owners to take all reasonable steps to prevent the spread of, and as far as possible eradicate deer from their properties. This will create a financial burden on land owners not already undertaking control. Also, declaration as a pest animal would mean that recreational hunting of deer would no longer be permitted in areas managed under the National Parks Act 1975 where hunting is currently permitted.

It would also remove the recreational hunting and private land laws which help ensure destruction is humane and safe.

Consistent with this, the draft strategy does not propose classifying the established deer species (Hog, Red, Sambar and Fallow Deer) as pest species. However, an action of the strategy is to review the classification of deer species not present or established (Chital, Rusa, Wapiti, Sika) and investigate their transition to prohibited pest animals.”

The VNPA has a long held ideological opposition to public land hunting and it is difficult to view this recommendation as anything other than an underhanded attempt to prosecute that aim.

“Establish a state-wide zoning system for deer control that prioritises management for, at least, national parks and other protected areas, and threatened species and communities currently identified in legislation. Remove the draft’s ‘resource zone’, as harmful invasive species should not be protected as a resource.”

This recommendation seemingly deliberately confuses management with protection. Managing wildlife in zones is considered best practice wildlife management internationally.

The reality is that there are a number of areas of the State where the impacts of wild deer on the environment are relatively benign and where deer can feasibly be managed by recreational hunting.

Deer are here to stay and ideologically driven rhetoric will not change that fact. They are a valuable resource to many and should be managed as such where appropriate.

The economic benefits of hunting generally, and deer hunting specifically, are well documented in Victoria.

While there are certainly threats arising from deer, there are also significant opportunities. They provide a valued food source and encourage a healthy outdoor lifestyle and exercise for those who choose to pursue them.



The division of the State into five different zones mirrors the framework of the generalised invasion curve and is consistent with best practice for wildlife management internationally.

Again, it is difficult to view this recommendation in isolation to the VNPA's ideological opposition to recreational hunting.

“Set evidence-based targets for effective control of deer.”

This vague recommendation ignores the fundamentals of wildlife management. It is the impacts, not the population numbers that matter.

Setting of simplistic targets would not only set government agencies up for expensive failure, it would perpetuate the pointless focus on raw numbers over preserving and restoring biodiversity in Victoria.

“Resource a deer-specific targeted baiting strategy for the state.”

There are no deer-specific baits or baiting mechanisms which are dispatchable on a landscape scale.

Most people would hold significant concerns regarding the humaneness of widespread poisoning of large herbivores and the potential environmental impacts such baiting would have.

The Deer Management Strategy should focus on realistic, achievable actions.

In conclusion, the Draft Victorian Deer Management Strategy has been developed following exhaustive consultation with experts in wildlife and land management and with a broad range of stakeholders.

It does not deliver everything that hunters would want in a strategy, however, it is logical, realistic, evidence based and aligns closely with the generalised invasion curve. In our view it strikes a sensible balance.

There are a number of areas in which we are in agreement with the VNPA, it is disappointing that they continue to focus their efforts on division.

We urge the State Government to ignore this ill-conceived campaign from the VNPA and re-assert that Government policy with regards to wildlife will be made based on facts, data and evidence.

Regards

Barry Howlett
Executive Officer
Australian Deer Association
eo@austdeer.asn.au

David Laird
Hunting Manager
Sporting Shooters Association of Australia (Vic)
david.laird@ssaavic.com.au