



Australian  
**Deer**  
Association

**Australian Deer Association response  
to the Queensland Government's  
Feral Deer Management Strategy 2010-2015  
(Consultation Draft)**

**31<sup>st</sup> December 2010**

**TO:** Feral Deer Management Strategy  
Biosecurity Queensland  
Department of Employment, Economic Development and Innovation  
GPO Box 46  
BRISBANE QLD 4001

In response to the Queensland Government's **Feral Deer Management Strategy 2010-2015** (*Consultation Draft*) the **Australian Deer Association** provides the following submission:

## Summary

The Australian Deer Association (ADA) is committed to maintaining the status of wild deer in Australia and will continue to participate in any process towards better management of the historical deer herds and control of new populations in Queensland.

Even though wild deer in Queensland are now declared pest species, ADA will engage with the Queensland Government to ensure optimal outcomes are achieved that provide mutual benefits to all interested parties while addressing the environmental, social and economic issues.

However, it is difficult for ADA to collaborate in a meaningful way under the current attitude and bias of the proposed Management Strategy 2010-2015. The strategy has a preconceived position that wild deer are having a significant impact, but there is no substantiation of these claims. Such lack of objectivity brings no credit at all to the strategy and severely reduces the chances of either stakeholders or the community in general accepting the validity of the strategy.

ADA recommends, that because of unsubstantiated claims of negative impact by wild deer and the subsequent unlikelihood of achieving stakeholder and community acceptance, Biosecurity Queensland declare a 5 year moratorium before finalizing a wild deer strategy. This would enable Biosecurity Queensland to scientifically monitor and measure the impacts of Queensland's wild deer herds through comprehensive research programs.

Furthermore, ADA recommends the establishment of a 'Steering Committee' to facilitate the development of a revised strategy that will enable the implementation of effective deer management on both private and public land

throughout Queensland. Formation of such a committee and the inclusion of those groups and individuals who have significant knowledge of Queensland's wild deer herds and considerable experience in cooperative wild deer management will allow valuable input from all stakeholders resulting in a balanced and positive strategy for management of wild deer in Queensland.

## **General Response**

ADA supports effective management of the wild deer resource. However, effective management will only come with support from the community, including landowners and hunters. A large proportion of landowners do not consider deer pests. (Finch and Baxter 2007). The Queensland Government Feral Deer Management Strategy 2010-2015 (Consultation Draft) exposes a plethora of unsubstantiated biases towards wild deer that will fail to win the community support required to achieve effective management.

The draft strategy has a heavy bias towards negative and outdated concepts such as eradication. This concept has been a failure world-wide unless there is a considerable economic incentive involved. Even with this incentive, most efforts have failed. ADA feels disenfranchised by the strategy as currently written. ADA believes the strategy is unbalanced and will be purely decorative - a loose collection of often irrelevant and misquoted information from other policy documents masquerading as a stand-alone policy. Its' one important feature is that it will not achieve its objective.

Elsewhere in Australia, hunters and landowners have supported deer management programs when equity in the program is balanced and stakeholders are treated as genuine partners in wildlife management, such as the 2009 Victorian Government Hog Deer Management Strategy. Effective management includes the control of new populations and management of historical herds by employing, for example, Ecological Deer Management (EDM) principles, where landholders and managers set deer harvest levels according to population numbers and the impact of deer on environmental, agricultural and community values and demands. Such management recognises environmental carrying capacity and cultural carrying capacity, and provides ownership by utilising local solutions to local issues.

ADA is disappointed at the poorly researched history, the selective and misleading quotations of research papers and the taxonomic errors, for example the current recognised nomenclature for the taxon known as rusa deer is *Cervus timorensis* rather than *Rusa timorensis* and the accepted nomenclature for the taxon as sambar deer is *Cervus unicolor* rather than *Rusa unicolor*. All of which undermine the credibility of the document. The document is lacking the requisite information on 'how', 'how much', 'when', and 'who will be responsible', and this lack of detail makes the document purely speculative and of little practical value.

ADA is disappointed that the strategy:

- Is promulgating a view for the community to accept that wild deer are an 'issue' where there is no substantiated documentation to support this view.
- Is based on unfunded and unachievable goals and relies on failed and implausible responses to management such as eradication, which have failed globally and are not recommended by the Federal Government's Invasive Species CRC.
- Will be implemented ahead of the findings of the current research by the University of Queensland into red deer management, and of cultural and economic values of wild deer in Australia.
- Ignores the considerable effort and financial contribution of hunting organisations in Queensland and nationally into the study of deer and how they can be better managed, including ADA's ongoing commitment to deer research by the University of Queensland at Cressbrook Dam. Biosecurity Queensland is also a collaborative partner to this project.
- Fails to genuinely engage and meaningfully collaborate with stakeholders, and chooses not to recognise the cultural and historical value of deer. The Queensland Government needs to embrace stakeholders, not alienate them.
- Erroneously claims that deer will spread endemic and exotic diseases, when there is no documented instance where wild deer have caused loss or threat to Australian livestock industries.
- Fails to quantify the impact of deer in Queensland, and relies on an introduced species bias and the preconceived notion that wild deer are having a negative impact simply because they are not native animals. This lack of objectivity discredits the Queensland Government.
- Fails to provide a believable argument that there is a deer 'issue', apart from a very few isolated and specific locations where these populations could be managed.
- Will, in its current form, fail to ensure stakeholders are committed to wild deer management because of the current intent of the Strategy.
- Makes a deliberate reference to the differing objectives of existing 'recreational' hunting groups and further suggests varying ways these groups may contribute to long-term management. This serves no other purpose other than alienating the hunter groups from each other, rather than encouraging a cooperative approach. (Refer to 2.2 Effective Management – Background – Paragraph 3 Page 15 and Paragraph 4 Page 16).

## Response to Questions Posed

**Question 1: Will the proposed strategic actions adequately address the challenges to feral deer management in Queensland? If not, what further actions are required?**

- Unfortunately, the draft strategy provides insufficient direction on the challenges to wild deer management to answer this question. The Australian Deer Association (ADA) believes that regardless of legislated pest status, the on-ground status and impacts of deer in Queensland are yet to be scientifically quantified. Until more definitive study and research, such as the current University of Queensland project at Cressbrook Dam, has determined the actual impact of wild deer in Queensland, any deer management strategy is premature and not likely to be supported by the Queensland community.

**Question 2: What obstacles can you identify that will limit the effectiveness of the strategy? Can you suggest ways the strategy could address these obstacles?**

- The current strategy and the prevailing bias behind it are barriers to success. The strategy as currently written will have limited effect because it fails to adequately recognise the variety of views and affinity that stakeholders have of deer. Certainly, there will be localised overabundance issues, but these can and are currently being resolved locally under current legislation and with stakeholder engagement. The strategy will only engage stakeholders when the strategy is able to demonstrate any significant impact of wild deer on Queensland's communities, environment, and livestock.
- The ADA suggests a five year moratorium on developing a wild deer strategy. During the moratorium period, ADA strongly suggests that Biosecurity Queensland collaborates with landholders, hunting organisations and other stakeholders to undertake a well-resourced, comprehensive and inclusive research and monitoring program to measure the impacts and values of wild deer in Queensland. Certainly, deal with localised issues as they arise in the interim, but do not rush into overall ill-conceived policies.

**Question 3: What are the strengths of the strategy? Are these strengths fully utilised in the strategy?**

- The strategy has few strengths, it argues from an introduced species bias, is poorly researched, poorly written and premature. If the Queensland

Government wants to develop an inclusive strategy it must use science to prove negative impacts and should clearly outline:

- 'how' the strategy will measure and manage impacts,
- 'how much' and 'when' funding and resources will be allocated over a ten or twenty year period, and
- 'who will be responsible' at landholder, local and state government level.

**Question 4: What other matters need to be addressed to ensure effective feral deer management in Queensland?**

- To win community and stakeholder endorsement and support for the management of any wildlife species, effective policy must provide credible evidence, and genuinely collaborate with stakeholders and engage the public. Independent research into the impacts of deer such as will be provided by the University of Queensland research at Cressbrook Dam will provide evidence of the level of management required, and may influence the public of the need to undertake effective wild deer management in Queensland.
- ADA recommends the establishment of a 'Steering Committee' to facilitate the development of a revised strategy that will enable the implementation of effective deer management on both private and public land throughout Queensland.

## **Conclusion**

On the basis of the content of the *Consultant Draft*, ADA does not support the proposed strategy however we are prepared to assist the Queensland Government to develop and implement a revised strategy that is generally accepted by all stakeholders.

---

**AUSTRALIAN DEER ASSOCIATION**  
**Queensland State Executive**  
**PO Box 778**  
**North Lakes Qld 4509**