

# National Feral Deer Action Plan

## Submission Guide

### Introduction

There is a public consultation regarding the future management plans for 'feral' deer nationally. Unsurprisingly, the current plan focuses on all the different ways that deer can be killed and makes no mention of exploring other non-lethal alternatives that may achieve superior and longer-lasting results.

The Animal Justice Party (AJP) acknowledges that introduced species are having negative impacts on our wildlife and ecosystems and that these do need to be discussed and managed, however we do not accept that lethal approaches are the only way. Lethal control (killing/culling) is currently favoured by Government agencies such as Parks Vic, DEECA, DJPTR etc. who are responsible for the 'management' of introduced species. The greatest issue is that non-lethal approaches are not even being considered. The current arguments against them are 'too expensive', 'too difficult', 'not enough evidence', yet if no resources are diverted to further research, then we'll never know if these measures could work practically. Additionally, the plan doesn't recognise that killing of deer has been used for years and yet populations continue to increase. A major hurdle to finding a lasting solution is that decision-makers appear to be caught in a 'cognitive rut' of their own making. The adage referring to "doing the same thing over and over and expecting a different result" seems relevant here.

This consultation presents an opportunity to present an alternative view and potentially change the narrative. Given that existing strategies have only had short term and localised impacts while being the default solutions over many years, the impact of non-lethal strategies is likely to take more time to become effective. Consequently, it is important that we adopt a longer-term view toward population control of introduced species.

### Consultation Details

For more information, and to download the Draft National Feral Deer Action Plan, go to the [National Feral Deer Action Plan](#) website.

Consultation closes on **Monday, 20 March 2023** with feedback to be provided either via email to [coordinator@feraldeerplan.org.au](mailto:coordinator@feraldeerplan.org.au) or via [www.feraldeerplan.org.au](http://www.feraldeerplan.org.au)

## Ideas on How to Respond

Whilst many people may want to focus on simply not killing deer, we need to recognise this will have little sway as the current plan is all about how to kill them. We need to focus on 3 angles:

1. Killing deer, even through many methods, is not working as a method of population control (hence other methods should be considered).
2. Current approaches may have other negative unintended consequences for wildlife and the environment.
3. Money and resources should be allocated towards exploring alternative strategies such as immunocontraception, apex predator control, guard animals, genetic tools and organic communication.

**Below are some points you may like to focus on in your submission:**

### 1. Shooting

- Deer kills do not keep deer numbers down. Populations tend to 'bounce back'.
- Lower numbers mean increased access to resources. They may produce twins or triplets, and these offspring will reach earlier sexual maturity.<sup>1</sup>

### 2. Baiting

There are a number of priority actions in the plan to control deer numbers, one of which is "Develop lethal baits and other tools".

- The usual chemical used for baits is 1080 poison.
- 1080 is a cruel and inhumane poison which kills non-target species by both primary and secondary poisoning.
- 1080 is non selective and cannot discriminate between species.
- This can alter ecosystem balance.
- Baited areas cannot be controlled or guaranteed.
- Baits may be cached or moved several kilometres by animals. The baited area cannot be controlled or guaranteed.
- PAPP is regarded as a slightly more human alternative to 1080 poison, as it causes a quicker death.

**Australia has vowed to halt the loss of any more species and end its status as "the mammal extinction capital of the world".<sup>2</sup> Poisons are not congruent with this goal.**

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<sup>1</sup> <https://www.humanesociety.org/resources/why-deer-killing-programs-dont-solve-conflicts-deer>

<sup>2</sup> <https://www.bloomberg.com/news/articles/2022-10-04/australia-to-stop-being-a-world-leader-for-mammal-extinction>

### **3. Alternative strategies**

#### **3a. Immunocontraception**

- Immunocontraception stops more young being born.<sup>3</sup>
- More funding is needed for research to investigate immunocontraception as a viable alternative to lethal measures.

#### **3b. Apex Predator Control**

- The dingo is Australia's apex predator. Dingoes control the weak and sick animals through predation.<sup>4</sup>
- Dingoes control other species just by their presence.

#### **3c. Guard Animals**

- Australian farmers are getting good results with guardian dogs.<sup>5</sup>
- They repel kangaroos, feral deer and other animals.
- They lessen the need for lethal controls.

#### **3d. Genetic Tools**

- CRISPR-Cas9 is a genetic technology capable of affecting fertility in a population-wide target species. It exists now and is expanding in its applications; through stringent regulations, we can direct it to beneficial use.

#### **3e. Organic Communication**

- This technology has emerged from the Waite Institute of the University of Adelaide.<sup>6</sup>
- It uses a species-specific communication to direct that species to move away from sensitive areas.
- Further research is required into applying the technology to other species.

#### **3f. Using a variety of non-lethal methods**

- The negative impact of introduced species (in this case, deer) is a hard problem to solve.
- There is no 'one size fits all' solution.
- A combination will work best, so long as population control methods are non-lethal.

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<sup>3</sup> [https://bds.org.uk/wp-content/uploads/2021/01/Bullet-or-Needle\\_Deer-AUTUMN\\_2019.pdf](https://bds.org.uk/wp-content/uploads/2021/01/Bullet-or-Needle_Deer-AUTUMN_2019.pdf)

<sup>4</sup> <https://adrf.com.au/content/view/35/79>

<sup>5</sup> <https://landholdersfordingoes.org/livestock-guardian-animals>

<sup>6</sup> <https://cherrp.eco>

## **Conclusion**

Humans are responsible for the impact of introduced species, through poor decision-making. We must not vilify 'pest' species.

Please use this consultation to send a strong message that we need to consider all possible alternatives in managing the populations of introduced species – and that non-lethal measures can be effective, and should be considered as part of this and any future management plans.

**Please reach out to Nat Kopas if you have any questions or would like to discuss further: [advocacy@ajpvic.org.au](mailto:advocacy@ajpvic.org.au)**

**Thank you for being a voice for animals.**