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Project Manager  
Wild Fallow Deer Management Plan Project

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## DRAFT TASMANIAN WILD FALLOW DEER MANAGEMENT PLAN

Thank you for the opportunity to provide comment on the draft Wild Fallow Deer Management Plan.

Private Forests Tasmania (PFT) is an independent statutory authority established under the *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. Under our [Corporate Plan 2021-24](#) one of our goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

Fallow deer continue to be a significant challenge for private forest growers. Deer browsing damages both newly established tree plantations and natural forest regeneration adding considerable costs to private forest growers. These costs are incurred in controlling deer populations and in responding to the damage they cause to young trees and other forest assets. The draft Management Plan highlights the alarming growth in the deer population over the last 35 years (6.2% per annum from 1985-2020) so clearly the problem is getting worse not better.

The impact of deer on private forest growers and other primary producers can potentially put at risk the Government supported [Strategic Growth Plan for the Tasmanian forests, fine timber and wood fibre industry](#) and also the Governments own Agrivision 2050 targets. PFT is also heavily investing in its [Tree Alliance](#) campaign which aims to raise awareness of farm forestry and the benefits of trees on farms, and to encourage and facilitate farmers to plant and integrate commercially viable trees in the agricultural landscape. These aims are also made more challenging by the increasing numbers of deer. It is difficult to understand how the benefits of deer for recreational hunting outweigh the negative impacts on the State's food and fibre growth targets.

The zoning proposed by the Plan is perplexing. Firstly, there does not appear to be any hard boundaries between zones so it may be difficult to know which zone you are operating in. Secondly, the zone 2 goal is to manage overall deer populations down while for zone 3 the goal is to manage toward 'no deer'. Yet the Plan does not define what success will look like for achieving these goals. There are no population estimates provided in the Plan for each of the zones and there are no performance measures or targets set to assess whether these goals are being achieved. With the current growth trajectory of the deer population, it will take a considerable effort to achieve these goals. It is important that the Plan clearly articulates how the Tasmanian public will be able to gauge the success of this Plan in 5 years' time.

The zone 1 goal is to manage for sustainable hunting, however there are significant private forest assets within this zone and therefore forest managers and landowners should have the freedom to control deer impacting on their assets in this zone. Whether this is through a Property Based Wildlife Management Plan or a permit, the conditions imposed should not be an unnecessary administration or compliance burden for forest managers and landowners.

In regard to the costs of deer control to landowners, this could be offset by the sale of deer meat otherwise left to decompose in the landscape as a wasted resource. PFT understands there are regulatory barriers to the recovery and use of this meat however we urge DPIPW to continue to work toward a sensible outcome where this valuable resource is not wasted, and it contributes to control costs.

Yours sincerely,



Penny Wells  
CEO Private Forests Tasmania