



**Biodiversity
Council**

Submission to the Deer Management Policy Review Discussion Paper

9 January 2026

About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on the [Deer Management Policy Review Discussion Paper](#) (the Discussion Paper).

Our understanding

In 2022, the Tasmanian Government released the [Tasmanian Wild Fallow Deer Management Plan 2022-2027](#) (the Management Plan). The purpose of the Plan is “to set clear goals and management objectives for wild fallow deer in Tasmania over the next five years”. The goals are:

Social, Economic and Environmental Goals

- *Provide increased options to farmers and land managers to effectively control the impacts of deer on their activities.*
- *Continue to provide for responsible recreational deer hunting as a legitimate and valued activity in Tasmania.*
- *Reduce public safety risks from deer.*
- *Reduce the risks to the natural and cultural values of Tasmania’s conservation reserve estate and other public and private lands.*
- *Protect Tasmania’s biosecurity by reducing the risks of deer as a potential disease vector.*

Deer Population Goals

- *Avoid further potential spread of deer.*
- *Reduce the abundance and geographic range of deer with a particular focus on areas outside the traditional range.*
- *Support property-level management of deer to minimise economic and environmental impacts whilst providing for sustainable hunting in selected zones*

The Management Plan establishes three management zones:

- Zone 1 Traditional Range (DMZ 1) - Manage deer as a sustainable hunting resource while allowing landholders flexibility to reduce impacts.
- Zone 2 Buffer Zone (DMZ2) - Transitional area to prevent further spread and enable eradication where feasible.
- Zone 3 Eradication Zone (DMZ3) - Prioritise removal of deer from conservation areas, wilderness regions, and periurban environments where they present risks.

Since the deer management plan was developed, the deer population has been managed using a mixture of hunting, culling by the Department of Natural Resources and Environment Tasmania, and the issue of control permits to landholders.

The Tasmanian government has committed to an annual review of the effectiveness of policies and management tools under the Management Plan. The 2025 Review focuses on the Government’s commitments to streamline permits in DMZ1 and make DMZ3 a complete eradication zone, but also occurs in the context of the Tasmanian Government’s commitment to ‘reducing red tape’.

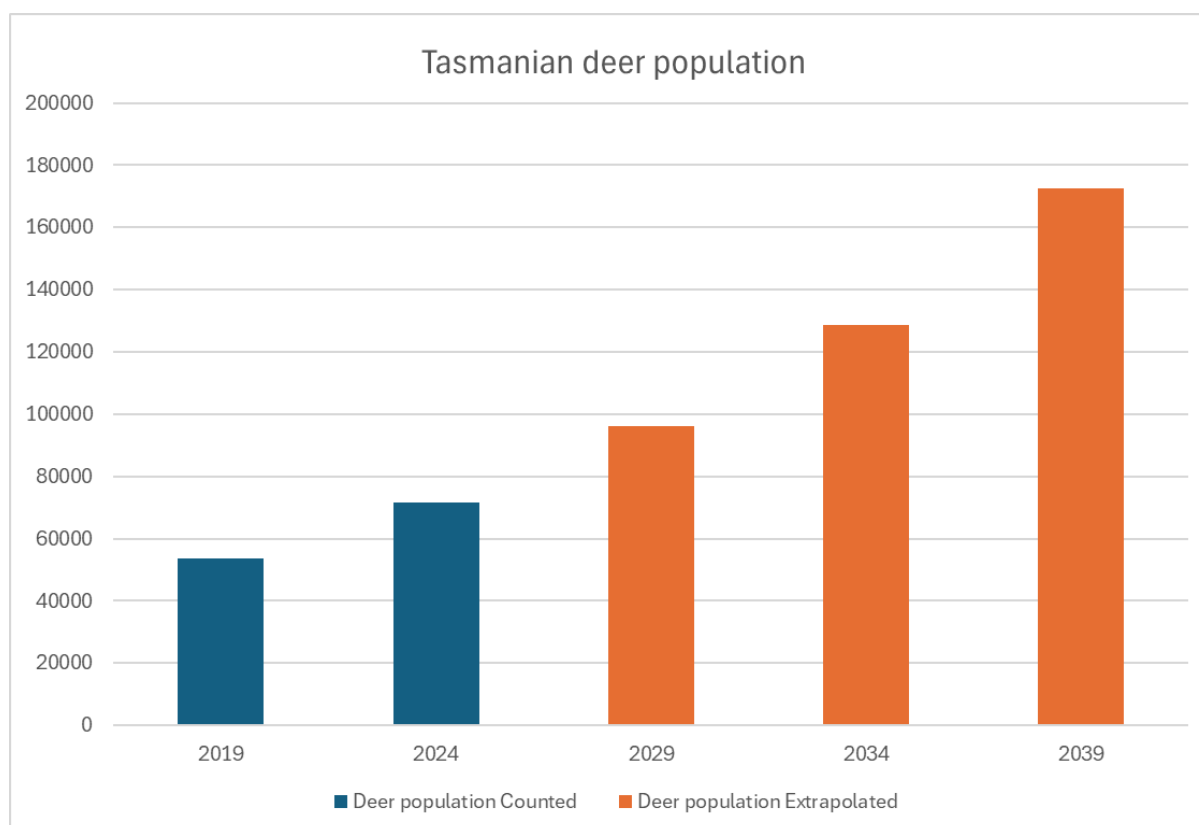
Our concerns about the plan are outlined below.

1. Current management approaches are failing to curb the deer population

The [latest aerial survey of fallow deer in Tasmania](#) indicates that there has been a marked increase in deer since the previous survey in 2019 from an estimated 53,660 to 71,655. Deer have also spread outwards with denser populations now occurring close to high-value conservation areas around the Walls of Jerusalem National Park and the Central Plateau.

Importantly, the 2019 survey informed the development of the Management Plan, but the aerial survey report notes that the degree of change in population “was not anticipated”. The report notes that “there is no evidence of a decline in the deer population in any area”.

The report notes that the population has increased between 12-55% in 5 years, an annual growth rate of 2-9%. If one assumes a 6% annual growth rate, there is potential for the population to double from the 2019 estimates by 2031.



The aerial survey findings should prompt a significant rethink of the approach to deer management, because current management approaches are failing to meet the Management Plan’s goals of ‘avoiding further potential spread of deer’ and ‘reduce the abundance and geographic range of deer’. The [National Feral Deer Action Plan](#) notes that feral deer cause significant economic, environmental and social impacts. Parks Tasmania notes that fallow deer threaten the natural values of the Tasmanian Wilderness World

Heritage Area.¹ They are estimated to cost the Tasmanian agricultural industry at least \$10 million annually,² which is likely to increase with the deer population.

All of the proposed policy measures in the Discussion Paper—with the exception of no new deer farms in DMZ2 and DMZ3—relate to enabling individuals, primarily hunters but also landowners, to kill deer.

Extensive evidence demonstrates that recreational hunting is not an effective method for managing invasive species. While hunting kills individual animals it does not occur at a scale or with sufficient coordination and strategy to produce a significant reduction in invasive animal populations and their impacts, especially for widespread species that reproduce rapidly such as deer.

To be effective, invasive species programs must reduce populations below their growth rate. For fallow deer this means removing 35% of the deer population each year to *halt population growth*.³

This is simply not achievable by recreational hunting or landowner shooting. The National Feral Deer Action Plan notes that “recreational shooting, motivated solely by obtaining meat or trophies, generally fails to sufficiently reduce feral deer numbers and meet control program goals in many parts of Australia”.⁴ This is consistent with the 2024 NSW Natural Resources Commission invasive species management review which notes that “recreational hunting by itself does not result in effective pest management.”⁵

A recent study at Silver Plains Reserve in Tasmania, found that recreational hunting rates were not substantially reducing the population and that helicopter-based shooting and professional ground-based shooting, are likely to provide faster and greater reductions in population numbers.⁶ In the Gum Lagoon Conservation Park in South Australia, 65 recreational hunters over 4 days were only able to kill 44 deer. For comparison, one professional shooter in a helicopter was able to kill 182 deer in 4 hours.⁷

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<https://parks.tas.gov.au/about-us/managing-our-parks-and-reserves/twwha-deer-control-project#:~:text=The%20Tasmanian%20Wilderness%20World%20Heritage,a%20helicopter%20using%20thermal%20technology>.

² <https://feraldeerplan.org.au/the-challenge/>

³ Hone, J, Duncan, R and Forsyth, D (2010) Estimates of maximum annual population growth rates of mammals and their application in wildlife management. *Journal of Applied Ecology*, **47**, 507-514

⁴ <https://feraldeerplan.org.au/info-resources/>

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<https://www.nrc.nsw.gov.au/Final%20report%20-%20NSW%20invasive%20species%20management%20review%20-%20November%202024.PDF?downloadable=1>

⁶ Comte, X., Bengsen, A. J., Botterill-James, T., Braush, C., Bryant, S. L., Dickson, C. R., Hamer, R., Hamilton, D. G., Seaman, J., Taylor, P. and Forsyth, D. M. (2025) Impacts of recreational hunting on an introduced population of Fallow Deer (*Dama dama*) in Tasmania, Australia *Ecological Management & Restoration* **26**:e70001
<https://onlinelibrary.wiley.com/doi/epdf/10.1111/emr.70001>

⁷ RSPCA. 2018. Australia submission to Senate inquiry into the impact of feral deer, pigs and goats in Australia.
<https://kb.rspca.org.au/downloads/submissions/2018-submissions>

Recommendation 1: *The Biodiversity Council recommends that the results of the aerial survey should prompt an urgent revision of the Management Plan. This should include removing the sub-goal of ‘Continue to provide for responsible recreational deer hunting as a legitimate and valued activity in Tasmania’ in favour of Statewide eradication.*

Recommendation 2: *The Biodiversity Council recommends that the Tasmanian Government fund a strategic feral deer control with at least \$8 million over 4 years focussed on aerial culling, coordinated ground shooting and trapping with clear success measures, monitoring and reporting.*

2. There should be no new deer farms

The Biodiversity Council supports the commitment to no new deer farms.

Recommendation 3: *The Biodiversity Council recommends that the commitment to no new deer farms in DMZ 2 and DMZ 3 be retained.*