



SUBMISSION

20 March 2023

Dr. Annelise Wiebkin
National Deer Management Coordinator
Invasive Species Unit - Biosecurity SA
Department for Primary Industries and Regions South Australia
GPO Box 1671
ADELAIDE SA 5001
By email: coordinator@feraldeerplan.org.au

Dear Dr. Wiebkin

Re: Draft National Feral Deer Action Plan 2022–27

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. There are over 5,200 sheep producers and more than 2,700 beef cattle producers in the state. With a membership of over 3,500 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia.

The red meat and wool industries are the backbone of South Australia's livestock and meat processing sectors, which contribute \$5.4 billion annually to the state.

Livestock SA is a member of Primary Producers SA (PPSA) and is the South Australian representative member of four national peak industry councils: Sheep Producers Australia, WoolProducers Australia, Cattle Australia and Goat Industry Council of Australia. Through PPSA and the Peak Councils, Livestock SA is also a member of the National Farmers' Federation.

The SA Beef & Sheep Industry Blueprints 2030 identify carbon neutrality, drought resilience, optimal animal health and enhanced custodianship of the land we farm, as key priorities to ensure South Australian red meat and wool producers continue to access premium global markets. Careful and appropriate management of invasive species, such as feral deer, is an integral component of our success. Consequently, Livestock SA welcomes the development of a National Feral Deer Action Plan and the opportunity to provide comment on the draft document.

Status of feral deer infestation and eradication initiatives in South Australia

There are an estimated 40,000 feral deer in South Australia, centred around the Limestone Coast, Adelaide Hills and Fleurieu Peninsula regions¹. Feral deer populations in South Australia are also

¹ South Australian Feral Deer Eradication Program (PIRSA) https://pir.sa.gov.au/biosecurity/introduced-pest-feral-animals/find_a_pest_animal/deer/south_australia_feral_deer_eradication_program

expanding, with increases in Fallow Deer by 30% and Red Deer by 16% in the Limestone Coast region each year².

If deer population control in South Australia continued at its current rate of approximately 27% of the population removed each year, numbers are estimated to increase to 280,000 in 11 years (500% of the current population).³ If this eventuated, the associated financial losses experienced by livestock producers are estimated to increase from \$36 million p.a. (2020/21) to \$242 million p.a. by 2032³. Livestock SA considers this must be avoided.

Livestock SA proactively supported the Department of Primary Industries and Regions SA (PIRSA) and Landscape SA (previously known as the South Australian Landscape Boards) in their pursuit to better understand the impact of feral deer on South Australia. This included financial support for an economic analysis of the impacts of feral deer and a cost/benefit analysis of deer eradication in South Australia, *Feral Deer Control Economic Analysis: A Report for Primary Industries and Regions SA* (BDO EconSearch).

This report found effective deer control over 11 years, beginning with 2021-22 in South Australia is not only feasible but a worthwhile investment with a calculated net value of \$517.8 million over 11 years if deer numbers are more aggressively reduced, compared with a business-as-usual approach³. The report also found that an effective management program would also improve the South Australian Gross State Product by \$126.9 million after 11 years.

Significant investment has been made into the management of feral deer populations in South Australia, with \$1.5 million spent each year on culling activities. This program has resulted in an estimated reduction in the population of 10-12% each year and with culling through landholders and hunters there is an estimated overall reduction in the population of 20% each year. However, evaluations indicate that to achieve effective control by 2032, a reduction of a minimum of 34% of the population is needed every year⁴.

Livestock SA supports the feral deer eradication program delivered by PIRSA and the legislative requirement for landholders to cull feral deer on their properties under the *Landscape South Australia Act 2019*⁵. However, it is evident the current program is not at the required level to achieve the goal of effectively managing feral deer populations by 2032 and a greater and cross-border investment is essential.

Livestock SA supports the development of the National Draft Action Plan and its explicit collaborative approach to address current shortfalls and maintain the momentum of the work completed to date by state-based agencies and land managers.

² Lethbridge MR and Andrews LM, 2016, Feral Deer Aerial Survey of Gum Lagoon Conservation Park and surrounds, 2016 EcoKnowledge report to Natural Resources South-East, Department of Environment, Water and Natural Resources, South Australia

³ Feral Deer Control Economic Analysis: A Report for Primary Industries and Regions SA (BDO EconSearch)

https://pir.sa.gov.au/_data/assets/pdf_file/0003/422175/feral-deer-control-economic-analysis.pdf

⁴ South Australian Feral Deer Eradication Program (PIRSA) https://pir.sa.gov.au/biosecurity/introduced-pest-feral-animals/find_a_pest_animal/deer/south_australia_feral_deer_eradication_program

⁵ PIRSA Declared Animal Policy (Feral Deer) https://pir.sa.gov.au/_data/assets/pdf_file/0011/232040/declared-animal-policy-feral-deer.pdf

Response to draft Action Plan

Goal 1 – Stop the spread of large feral deer populations and reduce their impact.

Livestock SA supports this goal and the underpinning strategies to create a deer containment zone, and to control priority feral deer populations in the current distribution range.

However, it is imperative that the national custodians of the plan follow through on its explicit intention to collaborate and align with existing state-led initiatives and consult with those with local knowledge of feral deer populations and their behaviour (such as PIRSA, Landscape SA and landholders) when deciding on feasible buffer zones, control priorities and methods.

Goal 2 – Control (drive down densities as far as possible) or eradicate small, isolated populations before they spread.

Livestock SA supports this goal and its underpinning strategies to (i) eradicate small populations beyond the containment zone, and (ii) reduce the impacts of feral deer in peri-urban areas.

However, the process of prioritising populations for eradication and minimisation needs to be fair and transparent, to ensure those states or regions which have already invested heavily in feral deer control are appropriately supported to maintain momentum, and progress is not impaired by conflicting policies in bordering jurisdictions.

Goal 3 – Protect significant sites from impacts from feral deer (Threatened species, etc.)

Livestock SA supports this goal and its underpinning strategies to (i) develop management plans to protect national significant areas, and (ii) protect habitats recovering from bushfires.

However, the Plan should be expanded to include the need to recover from natural disasters other than bushfires, such as floods. They can potentially have equally devastating impact on available fodder, and flush deer out for easier eradication. Care should also be taken to consult widely with land managers and existing state agencies to ensure past and current initiatives to protect significant sites are recognised and respected, with activities under the Plan aligning with and actively supporting investment to date.

Furthermore, the process for prioritising which feral deer population should be managed first (when deciding between ‘significant sites’ and productive agricultural land) should be transparent, equitable and evidence-based.

Summary

In South Australia, proactive and effective collaboration between national, state, inter-state agencies and land-managers has led to significant progress towards the SA Sheep Industry Blueprint’s target to eradicate wild dogs inside the Dog Fence. Livestock SA believes the National Feral Deer Action Plan has the same potential, so long as the intended collaboration is proactively implemented. Excellent communication between the National Co-ordinator with state and regional agency staff and other stakeholders (including land managers) already working in this area is essential. As is the prioritisation of activities which effectively build on the momentum achieved to date at a local level. Furthermore, it is critical that the program secures sufficient funding for a long and concerted effort.

Livestock SA looks forward to ongoing involvement with the National Action Plan for Feral Deer and the opportunity to provide input to feral deer management programs in South Australia.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.org.au if you would like to discuss this submission further.

Yours sincerely

Travis Tobin
Chief Executive Officer