

Department of Natural Resources and Environment  
Game Services Tasmania  
Hobart, TAS 7001

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5 January 2026

Dear Game Services Tasmania,

### **RE: Submission to the Tasmanian Deer Management 2025 Policy Review**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Tasmania Government on its 2025 Deer Management Policy Review.

ALCA is Australia's peak body representing organisations that work to conserve, manage, and restore nature on privately managed land. The conservation efforts of our 21 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat. We work closely with farmers and other landholders to help protect biodiversity and support livelihoods.

ALCA's two key recommendations are as follows:

- 1. Except where it is purely for recreational hunting purposes, all agricultural landowners and conservation covenant landholders across Tasmania – regardless of the zone they happen to reside within – should not be required to possess a permit or licence to destroy deer on their own land.**

Removing this unnecessary 'brown tape' would align Tasmania's approach to feral deer management with most other Australian jurisdictions<sup>1</sup> which do not require such permits or licences for this type of destruction.

- 2. A significant scale-up – and frontloading – of dedicated eradication funding and effort will be required to mitigate the serious impacts from feral deer upon Tasmania's agriculture and nature-based economies.**

**The proposals in the Discussion Paper** – whilst small steps in the right direction – **will not achieve a reduction in feral deer numbers in Tasmania.** An increase in ad hoc shooting by landowners and recreational hunters will not be sufficient to deliver a decline in Tasmania's rapidly increasing feral deer numbers.

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<sup>1</sup> For example, see: 'Managing feral deer in NSW', NSW Government;  
<https://www.dpi.nsw.gov.au/hunting/game-and-pests/managing-feral-deer-in-nsw>

## Feral deer – an economy and nature buster

ALCA strongly supports the eradication of feral deer in Tasmania.

Feral deer is devastating Tasmania's agriculture and its natural environment – both of which are key to Tasmania's ongoing economic and social prosperity. Other than Victoria, all other Australian jurisdictions have recognised the overwhelming damage done by feral deer to their landscapes and have chosen to prioritise the significant economic and environmental benefits from reducing and ultimately eradicating feral deer.

And they are very significant economic benefits. Analysis commissioned by the South Australian Government estimated the Internal Rate of Return (IRR) on implementing a feral deer eradication program in that State to be a whopping 505 per cent:

*“The internal rate of return (IRR) provides a measure for the rate of return to capital invested, here estimated to be 505 per cent for the eradication program. The decision rule for the project to be viable is that the internal rate of return (IRR) be greater than the discount rate which, for this project and projects of this kind is 7 per cent.”<sup>2</sup>*

Further, the Benefit Cost Ratio was estimated to be 2.7; i.e.:

*“...in a broad sense, for every dollar of investment under the [feral deer] eradication program, \$2.70 is returned to the SA community”.*

The sheer extent of damage to the natural environment from feral deer is well-documented and does not need to be re-prosecuted here; the Invasive Species Council provides a concise summary online<sup>3</sup>. The economic value of nature-based tourism and recreation to Tasmania is also well-understood<sup>4</sup>, and forms a key pillar of Tasmania's tourism strategy, where the top identified element “*that make[s] Tasmania such a special place to live are the very same things that make the state a compelling brand proposition to visitors*” is “*nature and wildlife like nowhere else*”<sup>5</sup>. Further:

*“The tourism visitor economy contributes a 6.7% share of Gross State Product - the highest in the country – and provides 12.2% of total Tasmanian jobs, more than agriculture, fishing, forestry and paper production sectors combined.”*

By comparison, feral deer hunting contributes an estimated 20,000 times less than the value of the Tasmanian agriculture<sup>6</sup>, and is a mere fraction of a fraction of the value to the State of nature-based tourism.

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<sup>2</sup> *Feral Deer Control Economic Analysis: A Report for Primary Industries and Regions SA*, BDO EconSearch, April 2022; [https://pir.sa.gov.au/data/assets/pdf\\_file/0003/422175/feral-deer-control-economic-analysis.pdf](https://pir.sa.gov.au/data/assets/pdf_file/0003/422175/feral-deer-control-economic-analysis.pdf)

<sup>3</sup> <https://invasives.org.au/our-work/feral-animals/feral-deer/feral-deer-in-tasmania/>

<sup>4</sup> For example, see:

[https://www.skillsiq.com.au/site/DefaultSite/filesystem/documents/Nationwide\\_Impacts\\_of\\_Outdoor\\_Recreation.pdf](https://www.skillsiq.com.au/site/DefaultSite/filesystem/documents/Nationwide_Impacts_of_Outdoor_Recreation.pdf)

<sup>5</sup> Page 11, *2030 Visitor Economy Strategy Tasmania*, Government of Tasmania and Tourism Industry Council Tasmania; <https://www.tourismtasmania.com.au/siteassets/documents/2030-visitor-economy-strategy/2030-Visitor-Economy-Strategy.pdf>

<sup>6</sup> See: <https://invasives.org.au/media-releases/huge-costs-limited-benefit-tasmanian-government-report-exposes-tiny-economic-value-of-feral-deer-hunting/>

The accelerating destruction of Tasmania's natural environment and agriculture from an explosion in feral deer numbers is putting a significant proportion of the Tasmanian economy at risk.

And yet, **whilst some tentative positive measures are proposed in the Discussion Paper, they do not seriously deliver on the Government's election commitments**, nor on the Premier's instructions in Minister Pearce's Ministerial Charter letter:

*"[to] Intensify efforts to eradicate deer, recognising their significant threat to agricultural productivity and environmental health."*<sup>7</sup>

**ALCA strongly urges Tasmania to follow suit and reprioritise safeguarding its economy and nature of the many over the recreational interests of the few.**

Please note that ALCA is happy for this submission to be published in full.

## Recommendations

Again, ALCA's two key recommendations are as follows:

1. Except where it is for recreational hunting purposes, all agricultural landowners and conservation covenant landholders across Tasmania – regardless of the zone they happen to reside within – should not be required to have a permit or licence to destroy deer on their own land. Removing this unnecessary 'brown tape' would align Tasmania's approach to feral deer management with most other Australian jurisdictions<sup>8</sup> which do not require such permits or licences for this type of destruction.
2. A significant scale-up – and frontloading – of dedicated eradication funding and effort will be required to mitigate the serious impacts from feral deer upon Tasmania's agriculture and nature-based economies.

The proposals in the Discussion Paper – whilst small steps in the right direction – will not achieve a reduction in feral deer numbers in Tasmania. An increase in ad hoc shooting by landowners and recreational hunters will not be sufficient to deliver a decline in Tasmania's rapidly increasing feral deer numbers.

Other recommendations:

3. All protected areas for conservation (e.g. conservation covenants and public protected areas) should be designated as DMZ 3 (Eradication zones) as a matter of urgent priority, including Ben Lomond and Douglas Apsley National Parks.
4. That the entirety of the Tasmanian Wilderness World Heritage Area be designated as DMZ3 – the current area of exemption from eradication should be removed.
5. No DMZ1 Zones should directly abut either the Tasmanian Wilderness World Heritage Area or protected areas for conservation; there should be DMZ2 Zones (Buffer zones) in between all DMZ1 (Sustainable hunting zones) and DMZ3 Zones.

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<sup>7</sup> September 2025; [https://www.premier.tas.gov.au/\\_data/assets/pdf\\_file/0032/458384/PREMIER-OUTGOING-Minister-Pearce-letter-of-expectation.pdf](https://www.premier.tas.gov.au/_data/assets/pdf_file/0032/458384/PREMIER-OUTGOING-Minister-Pearce-letter-of-expectation.pdf)

<sup>8</sup> As above, n1.

6. Eradication efforts should have a particular focus on the Tasmanian Wilderness World Heritage Area, and protected areas for conservation (e.g. conservation covenants and public protected areas).
7. Year-round take should be allowed for all deer in all zones – there should be no restriction via ‘hunting seasons’ or bag limits.

ALCA particularly supports the following measures as proposed in the Discussion Paper:

8. That Female deer can be taken year-round. [Statewide Permit Streamlining, and Recreational Hunting Complementary Measure 2]
9. Remove DMZ1 conditions that restrict take of adult male deer to “inferior” heads only. [Statewide Permit Streamlining]
10. That take returns be required annually for all deer taken to assist with population Monitoring (whilst noting Recommendation 1, as above). [Statewide Permit Streamlining]
11. That in all zones recreational hunters can take of deer at night, subject to the caveats to ensure public safety. [Recreational Hunting Complementary Measure 5]
12. That there be no new deer farms approved in DMZ2 and DMZ3. [Further Deer Management Measures]

We look forward to working with the State Government to protect Tasmanian landscapes for current and future generations of Tasmanians.

**Australian Land Conservation Alliance**

## About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our twenty-one members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Biodiversity Legacy
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- National Landcare Network
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$400 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spillover effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.