



22 August 2022

The Hon Gayle Tierney MP
Minister for Agriculture
Level 1, 2 Treasury Place
East Melbourne Victoria 3002

Cc: Melina Bath MP, Member for Eastern Victoria

Foot & Mouth Disease and Wild Deer

Dear Minister,

I write in regards to a question you were asked in Parliament on Wednesday, 17 August, by the member for Eastern Victoria, Melina Bath (copied on this correspondence).

The substantive question related to the management of feral pigs and was relatively broad. The supplementary question made assertions and suppositions about wild hog deer and called for a very specific action that, in the view of the Sporting Shooters Association of Australia (Victoria), would be both unwarranted and futile.

SSAA Victoria

SSAA Victoria is the state's largest body representing the interests of recreational hunters and shooters.

The Association was established nationally in 1948 and in Victoria in 1951. SSAA has a membership of over 209,000 nationally and over 42,000 in Victoria.

The question without notice

The supplementary question of concern, as quoted in Hansard, is:

"I thank the Minister for her response. Speaking about other feral animals, I will go to my supplementary. Indeed I heard an interjection from the former Minister about landowners' responsibilities, and that relates to this question. With increased risks of FMD and the ability of the disease to be carried by feral animals, a number of farmers are wanting to take preventative action by having authority to control wildlife permits approved for species like, but not confined to, hog deer (sic). They are being told by the government that permits will not be preapproved and to wait until FMD arrives on our shores, which will be far too late if permits then need to be approved. Minister, given the seriousness of this situation and the need for preventative measures, will the government facilitate the preapproval of authority to control wildlife permits so farmers can be best prepared for this situation?"

"Feral" deer

It is an exercise in semantics but an important one from the perspective of being interested in sound, evidence-based management. Wild deer are not, by definition, "feral".

The World Organisation of Animal Health (WOAH) offers clear and widely accepted definitions for "wild", "captive wild", and "feral" animals. Wild animals are those animals that do not live under human supervision or control and do not have their phenotype selected by humans. Captive wild animals are those animals that live under human supervision or control, but their phenotype is not



selected by humans. Feral animals are those animals that do not live under human supervision or control, but their phenotype is (or has been) selected by humans.

By the above definition, most of Australia's free-ranging deer populations but particularly our sambar, rusa, chital and hog deer, are "wild", not "feral". Possible exceptions are some of the recently established fallow and red deer populations that have origins on deer farms where their genetic makeup was manipulated to achieve such things as greater docility, faster growth, bigger bodies or larger antlers.

Wild hog deer and Authority to Control Wildlife Permits

In Victoria, all deer are declared 'wildlife' for the purposes of the *Wildlife Act 1975*, with six established species further listed as game. All game deer species in Victoria (except hog deer) can be harvested all year round with no bag limits. Game licencing enables the government to ensure that hunting is conducted in a safe, sustainable and humane manner. Game licencing also provides a sound, tested mechanism to licence, regulate and communicate with Victoria's 42,000+ recreational deer hunters.

Deer species residing in Victoria are not classified as pests as this will achieve no real on-ground benefit and would leave harvesting un-regulated. A change in management arrangements could result in unsafe hunting practices, such as shooting deer under spotlight at night on public land. In addition, there would be a legal obligation for landowners to control deer on their property – this would impose a significant burden on landowners and divert money and resources away from their core objective of primary production.

Under a Governor in Council Order made in 2013, wild deer in Victoria, except for hog deer, are "unprotected" on private property. This means that subject only to some animal welfare considerations, most Victorian farmers are empowered to manage wild deer on their property as they see fit. The hunting community worked productively and co-operatively with the Agriculture Minister at the time and the farming community to strike a balance that addressed genuine concerns without diminishing animal welfare outcomes or sacrificing the interests of the hunting community.

Hog deer are not included in the Order as they are particularly vulnerable to hunting given their relatively small population and restricted range in parts of Gippsland. There is no evidence to suggest that the hog deer range is expanding. Landowners with hog deer causing detrimental impacts will still need to apply for an Authority to Control Wildlife (ATCW) permit to destroy them or act under the Wildlife (Game) Regulations 2012. This species is not known to cause widespread damage. SSAA Victoria monitors the management of hog deer closely. The Association is consistently and reliably informed that, when justified, ATCWs for hog deer are granted to landholders promptly and efficiently.

Wild deer and Foot and Mouth Disease (FMD)

There has not been a confirmed case of FMD in wild deer anywhere in the world. This is despite FMD being endemic to many countries with large, free-ranging, wild deer populations, including Sri Lanka, where Victoria's wild hog deer originated.

Deer have been shown to catch and carry FMD in experimental situations. However, this has never manifested in wild populations. Carrier status does not equal source of infection, and carrier animals



are shown to have five hundred times lower virus levels than clinically ill animals. Except for the African Buffalo, carrier status wildlife has never been documented to have infected a susceptible animal.

Similarly, native Australian wildlife is susceptible to FMD in experimental situations. Red kangaroos, Tree kangaroos, Echidnas and Water rats were all exposed to clinical infection with FMD in experiments in the 1960s. In the 1990s, an Eastern Grey Kangaroo in a Zoo in India became clinically ill with FMD and died. The Zoo was adjacent to a cattle market.

In reality, the likelihood of either native wildlife or wild deer spreading FMD if an outbreak occurs in Australia is remarkably low. FMD most commonly spreads during the movement of animals, for example, between farms or from farms to sale yards and processing facilities. The international experience in managing FMD has been that it is most effectively addressed by vaccinating and controlling the movement of livestock.

Conclusion

SSAA Victoria is committed to working productively and collaboratively with the government and other stakeholders to ensure that recreational hunting continues to be conducted in a safe, sustainable, humane manner and in line with community expectations. For game wildlife, in particular, the Association is concerned that any management decisions be based on clear and verifiable facts, data and evidence.

The Association respectfully submits that the concerns of the farmers seeking to take "preventative action" to address FMD concerns with wild hog deer are unfounded and would be more appropriately addressed with education than with acquiescence.

If you need any further information, please do not hesitate to ask.

Yours Sincerely

David Laird
Hunting Development Manager
Sporting Shooters Association of Australia (Victoria)