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Dr John Virtue  
General Manager – Strategy, Policy & Invasive Species  
Biosecurity SA  
CSIRO Building 1  
Entry 4, Waite Road  
Urrbrae SA 5064

Wednesday 17 January 2018

**Re: Feedback on the feral deer and feral pig draft policies under the South Australian *Natural Resources Management Act 2004 (NRM Act)***

Dear Dr Virtue,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the revised draft feral deer policy and the new draft feral pig policy developed under the NRM Act. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

The Society views feral pig and feral and farmed deer management as important biosecurity and conservation management issues and we would like to take this opportunity to applaud and wholly support the Government's objectives and proposed policy changes as outlined in these policy documents. Our primary concern is how compliance with these policies will be monitored, and suggest that each be amended to include this information. Please refer to the following pages for our further specific comments. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [julia.peacock@ncssa.asn.au](mailto:julia.peacock@ncssa.asn.au).

Yours sincerely,

Julia Peacock  
Nature Advocate

## **NCSSA comments on the feral deer draft policies under the South Australian *Natural Resources Management Act 2004* (NRM Act)**

NCSSA welcomes the opportunity to provide feedback on the *Declared Animal Policy - Feral deer*. The Society views feral and farmed deer management as an important biosecurity and conservation management issue. We applaud and wholly support the Government's objectives and proposed policy changes in relation to deer as outlined in the policy document.

We note that the previous policy was not successful in reducing the number of feral deer (as indicated by the sentence 'Numbers of feral deer across South Australia have increased since the first policy on feral deer was released in 2006'). We suggest that a brief analysis of why this was the case and therefore how this current policy will be more effective than the previous policy be included.

A key mechanism of this draft policy is the requirement for landowners (public and private) to remove at least 40 percent of female feral deer from all subpopulations each year. However, from the documentation provided, the definition of a subpopulation remains unclear so we suggest this be better defined. We also suggest that an explanation of how the Government will ensure compliance with this requirement be included within the policy.

The population offtake figures provided by Hone *et al.* (2010) are convenient and credible; however as the authors admit, the estimates have a high degree of uncertainty. As opportunities present themselves (e.g. Fleurieu control program), we would encourage efforts to further refine these figures for local conditions through adaptive management.

The Society was supportive of the *2017 Fleurieu feral deer aerial control program* and would like to see this program continued and expanded. We hope that this policy update will encourage the Government to redouble control efforts; as a demonstration of good faith to those managing private land. The cooperation and involvement of other public land managers (e.g. Forestry SA) will be important.

On a side-note, and taking into account the theme of public comments submitted on the yourSAy online discussion forum, NCSSA does not support recreational deer hunting on public land. We do however support the appropriate use of volunteer shooters (e.g. Sporting Shooters Association of South Australia) in coordinated pest control projects. Recent government reports have found their involvement in coordinated pest control programs to be beneficial (Lethbridge *et al.* 2014; Parks Victoria 2017); the latter study predicted that the involvement of volunteer shooters could conservatively save Parks Victoria \$0.5 million.

### References

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*, vol. 47, pp. 507-14.

Lethbridge, M., Harper, M., Strauss, J. and Andrews, L. (2014). *Goat Aerial Control Program Assessment Part I: Population modelling and simulation of scenarios related to control frequency, effort and location*. EcoKnowledge report to Department of Environment, Water and Natural Resources.

Parks Victoria 2017. *Strategic Action Plan for Feral Goats on Public Land in North-West Victoria*. Parks Victoria: Melbourne, Australia.

## **NCSSA comments on the feral pig draft policies under the South Australian *Natural Resources Management Act 2004* (NRM Act)**

NCSSA welcomes the opportunity to provide feedback on the *Declared Animal Policy - Feral pigs*. The Society views feral pig management as an important biosecurity and conservation management issue. We applaud and wholly support the Government's objectives and proposed policy changes in relation to feral pigs as outlined in the policy document.

One aspect of the policy that we suggest could be made more explicit is the requirement for tattooing domestic pigs. We found the following contained in an *Australian Pork* factsheet "All pigs 20 kg and over must be tattooed with your registered swine brand issued by [...] PIRSA. The person who bred the pig should brand the left shoulder and any subsequent owners should brand the right shoulder of the pig".

The draft policy also states that the number of pigs that escape from captivity is unknown because many domestic pigs are not tattooed. However, the draft policy does not specify how mandatory tattooing will be ensured so we suggest the policy be amended to include this information.

An important component of this draft policy is the requirement for landowners (public and private) to remove at least 60 percent of female feral pigs from all subpopulations each year. From the documentation provided the definition of a subpopulation remains unclear so we suggest this be better defined. We also suggest that an explanation of how the Government will ensure compliance with this requirement be included within the policy.

The offtake figures provided by Gentle & Pople (2013) are consistent with previously published estimates; however we would encourage any efforts to further refine these figures for local conditions through adaptive management.

### References

Australian Pork, Unknown, *Fact Sheet: Do I have to tattoo or tag my pigs?* (online), Available: <http://australianpork.com.au/wp-content/uploads/2013/10/FACTSHEET-Pig-Identification.pdf> (18 December 2017).

Gentle, M. & Pople, A. 2013, 'Effectiveness of commercial harvesting in controlling feral-pig populations', *Wildlife Research*, 40, pp. 459-69.