



THE AUSTRALIAN DEER ASSOCIATION'S

Submission to Tasmania's Deer Management Policy Review

January 2026





ADA MISSION

We advocate for the sound management of wild deer and ensure recreational hunting is sustainable, respected, and valued by the wider community and future generations.

We do this via our commitment to the sustainability of wild deer through habitat management, education, political advocacy, and community engagement.



Australian
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Introduction

The Australian Deer Association (ADA) welcomes the opportunity to provide input into Tasmania's proposed changes to Tasmania's Deer Management Policy Review.

The ADA is a non-profit association established in 1969 that represents the interests of Australia's recreational deer hunters. The ADA advocates for the sound management of wild deer and public land access for recreational deer hunting. The ADA continues this work today, having contributed to unlocking public land access for recreational deer hunting in New South Wales, Tasmania, and Victoria and developing a rich catalogue of scientific deer research.

Recently, following the ADA's advocacy, the Victorian government legislated that two new national parks will be open to recreational deer hunting in 2026: the Errinundra and Snowy River National Parks.

Public land access is cherished, and the ADA appreciates receiving the Tasmanian government's election commitment to opening up more public land for recreational deer hunting as part of a mature approach to managing Tasmania's wild deer population.

Foreword:

As we understand from the reported increase in deer numbers across the State via the 2024 wild deer aerial survey, we all need to take positive steps to ethically reduce the current population of wild fallow deer in Tasmania. With recreational hunting being the primary method of facilitating this, this can only be done if the hunter is given the opportunity to do so, via access to land, be that either public or private land, on which deer numbers are held.

With the majority of the wild deer population on private land, we need to facilitate hunter access to these lands across all DMZs. The hardest part of deer hunting in Tasmania has always been accessing hunting areas. Landowners need to be encouraged to engage with hunters, and hunters need to be educated in their responsibility as ethical hunters. All parties involved need to show mutual respect and work toward the common goal of returning our wild deer herd to a high-quality, sustainable herd.

When discussing deer management plans, a female-biased approach in recreational hunting is widely recognised as one of the most essential tools for influencing population outcomes.

Female deer are the primary driver of population growth. Each breeding female represents not just a single animal but also future recruitment through fawns across multiple seasons. By directing harvest pressure toward females, managers can more effectively moderate population growth, stabilise numbers, or reduce densities where impacts on habitat, agriculture, or biodiversity are a concern.

In contrast, harvesting males has little effect on population size. A relatively small number of males can service many females, meaning reproduction continues essentially unchanged even where male numbers are reduced. Focusing harvest on females, therefore, delivers a more predictable and measurable management outcome.

A female bias in recreational hunting also supports longer-term sustainability. Keeping populations closer to ecological and social carrying capacity reduces boom-and-bust cycles, limits damage to vegetation, and lowers the risk of sudden population crashes caused by drought, fire, or food shortages. This approach allows populations to remain healthier and more resilient over time.

Importantly, recreational hunters play a central role in achieving these outcomes. Encouraging and supporting the ethical harvest of female deer integrates population management into routine hunting, reducing reliance on more costly or controversial control methods. When clearly explained within management plans, a female-biased harvest helps align recreational hunting with broader conservation and land management objectives, strengthening its legitimacy and value as a management tool.

When balancing population-level effectiveness with animal welfare considerations, the ideal timing for harvesting fallow does falls within a relatively narrow window between fawn independence and the next breeding cycle.

With fallow deer, the rut typically occurs in April, and fawns are born in November. This means that through summer and early autumn, fawns are progressively moving from full dependency to nutritional independence.

From an animal welfare perspective, the highest risk period is from birth in November through to around February or early March. During this time, fawns are heavily dependent on their mothers for milk, protection, and survival skills. Harvesting does in this period carries a significant risk of orphaning fawns with a low probability of survival.

By late March, most fawns are four to five months old and are either fully weaned or very close to it. At this stage, the welfare risk associated with orphaning is substantially reduced. Fawns are feeding independently, more mobile, and better able to cope without maternal care.

From a population management standpoint, harvesting does just before the rut, typically in late March and early April, is highly effective. Removing females at this time directly reduces the number of breeders entering the rut, which has an immediate effect on fawning rates in the following season. This timing also avoids the welfare issues associated with dependent young.

There is also a secondary, though generally less preferred, window in late autumn to early winter after the rut. At this point, fawns are fully independent, so welfare concerns are minimal. However, removing does after the rut has already occurred does not reduce conception rates for that year, so population impacts are delayed by a full reproductive cycle.

In practice, many management programs identify late summer through early autumn, roughly February through early April, as the best compromise period. Within that range, late March to early April offers the strongest alignment between effective population control and reduced animal-welfare risk, provided local variation in fawning timing is accounted for.

In summary, the ideal time to harvest fallow does is after fawns are weaned but before the rut, as this timing maximises population-level impact while minimising the risk of welfare issues for dependent young.

The Department, Landowners, and Hunters need to work together toward the common goal of restoring our deer herd to a quality, sustainable level.

Once again, the key here is access to target the correct gender of deer at the right places at the right times.

The Department, through Game Services Tasmania, needs to take a proactive approach to educate all levels involved in proper Quality Game (Deer) Management to achieve a positive, ethical reduction in our wild fallow deer herd. This Education package could then be disseminated to hunting Associations across the State to educate hunters and others through a consistent messaging format.

Measure 1:

In DMZ3 remove hunting seasons and bag limits (and associated tagging) for hunting licence holders. While permits in DMZ3 allow unrestricted, 365-day take of deer, hunting licence holders (who do not have access to hunt on a property under a PPP or a SPWP) are restricted to taking only one male deer during the open season. Removal of these limits could further contribute to the DMZ3 objective of 'complete eradication'.

We would support this change if we received satisfactory clarification on the following points.

- How will the serious animal welfare concerns of starving fawns be adequately addressed to prevent fawns from suffering an inhumane death? Until later in summer, fawns will remain dependent on their mother for milk and are unable to fend for themselves, often taking shelter while their mother is feeding before returning to provide sustenance.
- Complete eradication needs to be defined. It is agreed that the goal of DMZ3 should remain to have as few deer in it as possible; however, given that eradication is not feasible, an appropriate definition is needed.

Measure 2:

In DMZ1, introduce a new condition that clarifies that female deer can be taken during the fawning period of mid-November to end February provided every reasonable effort is made to locate and humanely kill any dependent young of antlerless deer taken. Taking female deer is seen as critical to reduce the effective breeding population and to reduce deer numbers. The condition would also balance with any potential animal welfare concerns about lactating does and fawns. Relevant Animal Welfare Guidelines would be updated in consultation with the Tasmanian Game Council and the Animal Welfare Advisory Committee.

This IS NOT supported.

Similar animal welfare concerns are raised in measure 2 as are in measure 1 regarding the consequences of harvesting does during the summer period when they would have dependent fawns at foot. A consequence of shooting these does will result in the inhumane and unnecessary suffering of fawns during the fawning period.

We strongly support increased efforts to harvest females, as this will have the desired population impact; however, animal welfare cannot be disregarded.

Greater awareness and an education campaign need to be launched to educate hunters and landholders about the fawning period so that they can better time their management programs.

Measure 3:

In all zones, extend the male season from five weeks to seven weeks (or longer) with timing determined in consultation with deer hunting representatives.

This IS NOT supported.

We need to focus our efforts on reducing the Female deer / Doe population, not the Male Deer population. Adding time to the Buck season is counterproductive. We have not yet been convinced that extending the Buck season will increase the take of Female Deer; we believe it may have the opposite effect.

There may be a time when an extension of the buck season is appropriate, but we do not believe this is the time, as we need to take more female deer.

Measure 4:

In relation to the requirement in DMZ1 to tag all mature male 'stags' shot under licence remains but increase the number of tags from one to two per hunting licence holder (which can be used in any zone).

This IS NOT supported.

We do not consider additional Tags during the Buck season warranted, as our focus should be on reducing female deer numbers.

We would support that the one buck season tag could be used for any male deer, e.g., spiker or mature buck. So, it would become a buck or male deer tag.

There may be a time when an extra tag for the buck season is appropriate, but we do not believe this is the time, given that we need to take more female deer.

Measure 5:

In all three zones consider legalising recreational hunter take of deer at night, with the assistance of a detection device (artificial light or thermal), and from a conveyance, under a hunting licence, provided it would not unduly increase the risk of antisocial behaviour or policing concerns.

This IS NOT supported.

This measure is inappropriate and raises significant public safety concerns for hunters and other forest users, so much so that its tabled status is concerning.

Hunting and culling are materially different activities undertaken under different circumstances. While both involve harvesting an animal, recreational hunting during the day is complementary to other land users, whereas culling at night often requires closing public land to other users to ensure the activity is conducted appropriately.

Any culling activities undertaken out of normal prescribed hunting hours should be done under a Property Protection Permit (PPP).

Measure 6:

Remove the requirement to label deer parts when removing deer from a property, taken under permit. Currently, the Regulations require that a person taking deer under a Permit must not remove the head, or sever the body, of a deer at a location other than the usual residence of the holder of the licence under which the deer was taken, unless all products of wildlife relating to the deer have been labelled. Changes over time mean this requirement is redundant. Removal of this condition would reduce red tape for hunters and could provide flexibility for hunters with what parts they take home, and address difficulties in disposing of a full carcass off-site.

We support this change.

PPP and SPWP streamlining.

We support streamlining and reducing the number of permits. However, alongside these changes, additional education and supporting materials are required on harvesting females during the fawning period, including the significant animal welfare implications.

Additional Measures Proposed by the Australian Deer Association

Addition Measure 1:

Calibre Reduction for Antlerless Deer only.

This proposal would reduce calibre requirements for the taking of antlerless deer only. Under this approach, antlerless or female fallow deer could be taken using a projectile diameter of .224 or greater, provided the ammunition is capable of delivering a minimum kinetic energy of 1220 joules at 100 metres, equivalent to 900 foot pounds.

Addition Measure 2:

Introduction of Bow Hunting.

This proposal supports the introduction of traditional and compound bows for the taking of fallow deer in Tasmania, subject to appropriate conditions. These tools are particularly suitable for peri-urban settings and smaller parcels of public and private land, making them valuable for managing deer populations in these environments. A working paper has been developed by a stakeholder working group and can be provided upon request.

Addition Measure 3:

New Class and cost reduction of Hunting License

This proposal introduces a new hunting licence class for female deer only, priced at a reduced fee. The lower cost is intended to encourage a greater harvest of does by attracting new hunters and engaging those who may not be interested in buck hunting.



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